

**Docket Number:** TC24-041  
**Subject Matter:** First Data Request  
**Request to:** Gallatin Wireless Internet LLC (Gallatin or Company)  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** November 18, 2024  
**Responses Due:** December 4, 2024

1-1. Has Gallatin been serving Celerity's customers since its purchase on May 9, 2022? Explain.

**Response: Yes, Gallatin has been serving Celerity's customers since the Company purchased substantially all of Celerity's assets on May 9, 2022. To date, Gallatin has been providing only broadband services to Celerity's former customers.**

1-2. Is Gallatin not requesting a long distance Certificate of Authority in South Dakota due to the fact the Commission doesn't require them for VoIP service? If so, has Gallatin (or does Gallatin plan to) complete(d) the VoIP registration form for its long distance service on the Commission website?

**Response: Gallatin is not requesting a long distance Certificate of Authority in South Dakota because the Commission does not require a Certificate Authority for VoIP services. Gallatin is not currently providing VoIP services. At such time as Gallatin intends to begin providing VoIP services, it will submit the VoIP registration form.**

1-3. Refer to Gallatin's response to ARSD 20:10:03(18). Why doesn't Gallatin consider billing monthly recurring service charges in the month prior to service an advanced payment? Would Gallatin be willing to not have any prepaid charges?

**Response: Billing monthly recurring charges in the month prior to service is a standard billing practice in the industry. For example, Qwest Corporation d/b/a CenturyLink QC's Tariff No. 1 states:**

**2.3.2 PAYMENT OF BILLS A. Charges Due Charges for exchange service and facilities are due in advance. Charges for toll and long distance service are due when the bill for such service is rendered. All bills are payable by any means mutually acceptable to the customer and the Company. Failure to receive a bill does not exempt the customer from prompt payment of their account. The customer is held responsible for all charges for exchange service and facilities furnished at the customer's request and for all toll and long distance service furnished at the customer's station or stations, including charges for toll messages received at the customer's station or stations on which the charges have been reversed.**

**Gallatin should not be subject to different requirements than its competitors. Gallatin can agree not to provide pre-paid calling cards or similar pre-paid services and not require deposits or advance payments.**

- 1-4. Refer to ARSD 20:10:32:03(19). Provide a description of the efforts Gallatin shall use to prevent the unauthorized switching of local service customers.

**Response: As noted in the Application, Gallatin will not be providing traditional local exchange services. In general, Gallatin will only offer VoIP or exchange services in conjunction with its broadband services. Gallatin will also comply with the Commission's and the Federal Communications Commission's regulations governing how carriers may change a customer's primary local exchange provider.**

**Responses provided by: Jesse DuPont**