

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE PETITION)
OF ASSURANCE WIRELESS USA, L.P.,)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER)
FOR THE PURPOSE OF OFFERING)
LIFELINE SERVICE TO QUALIFYING)
CUSTOMERS)**

Docket No. TC24-002

JOINT MOTION TO DEFER CONSIDERATION

Applicant Assurance Wireless USA, L.P. (“Assurance”), Commission Staff, and Intervenor South Dakota Telecommunications Association (“SDTA”) hereby move the South Dakota Public Utilities Commission (“Commission”) to defer consideration of Assurance’s Petition in this docket, pursuant to A.R.S.D. 20:10:01:22.04.

In this proceeding, Assurance seeks designation as a Lifeline-only eligible telecommunications carrier (“ETC”) in South Dakota. Assurance originally requested that its ETC designation become effective no later than May 1, 2024. On February 22, 2024, the Commission issued an Order Granting Motion for Procedural Schedule establishing certain deadlines, including that the Commission would consider Assurance’s Petition at the Commission meeting scheduled for April 23, 2024.

Since then, it has come to Assurance’s attention, in the course of responding to discovery from Staff, that there is a technical problem with Assurance’s identification of the areas within South Dakota that Assurance seeks to define as its “service area” for purposes of the requested Lifeline-ETC designation. Specifically, the data provided by the mapping vendor used by Assurance does not track with the wire centers shown on the Commission’s website. Assurance seeks to provide a clear description of its intended service area in South Dakota so that the Commission, consumers, and other stakeholders can identify where Assurance will be providing

Lifeline-only ETC service. Assurance wants to present this information far enough in advance before the Commission's consideration of its Petition so that Staff, the SDTA, and other stakeholders have time to review the proposed service area information. Although Assurance wants to get the ETC designation in place as soon as possible, Assurance would rather endure a slight delay than present information that other parties will not have adequate time to consider or that the Commission will find inadequate. Assurance, Staff, and the SDTA agree that the circumstances described herein constitute good cause.

For these reasons, Assurance proposes, and Staff and the SDTA agree, that the consideration of this matter should be deferred from the April 23, 2024 meeting until the Commission's May 8, 2024 meeting.

Dated this 15th day of April, 2024



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Dated this _15th_ day of April, 2024

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Dated this _15th_ day of April, 2024

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