BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION OF IMPACT TELECOM, LLC FOR A CERTIFICATE OF AUTHORITY FOR INTEREXCHANGE SERVICES IN SOUTH DAKOTA	)))))	**APPLICANT'S RESPONSES TO STAFF'S SECOND SET OF DATA REQUESTS** **TC26-030**

RESPONSES TO DATA REQUESTS

Impact Telecom, LLC responds to the Data Requests of Staff of the South Dakota Public Utilities Commission as follows:

1. Does Impact need a certificate of authority for interexchange service in order to provide resold, interexchange Voice-over Internet Protocol services on a wholesale basis in South Dakota? Explain.

   Impact needs a certificate of authority for its proposed services. Impact's wholesale services include switched access services with bases in Internet Protocol (IP)-enabled services, circuit-switched services, Time Division Multiplexing (TDM). Additionally, Impact's wholesale services bridges networks to the Public Switched Telephone Network (PSTN).

   a. If the answer to the above question is no, why does Impact desire a COA from the Commission?

2. Refer to Impact's response to Staff's First Set of Data Requests #1. Staff stated: "Refer to the Application, Section 16, in which the Application states that the primary marketing channel will be via agents. Are these agents employed by Impact? And, does

Impact have policies applicable to its agents? If so, provide the policies." Please explain what is meant by the response "We are not directly marketing as Impact at the moment."

Impact markets itself as a wholesaler to other telecommunications providers as an enterprise through its affiliates, including 46 Labs, Versatel, and Hypercube. All marketing and sales personnel are employed by 46 Labs.