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September 1, 2005

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Public Utilities Commission  
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Pierre, South Dakota 57501

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SEP 1 2005

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

RE: **MCImetro Access Transmission Services, LLC**  
Our file: 4959

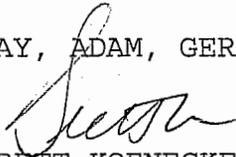
Dear Pam:

Enclosed are original and 10 copies of a Petition to Intervene in the following dockets: TC05-083, TC05-087, TC05-090, TC05-091, TC05-092, TC05-093, TC05-094, TC05-095, TC05-097, TC05-098, TC05-099 and TC05-109, which please file.

With a copy of this letter service by mailing is made upon the service list for each docket. Thank you.

Yours truly,

MAY, ADAM, GERDES & THOMPSON LLP



BRETT KOENECKE

BK:mw

Enclosures

cc/enc: Service List

Lettie S.D. Friesen  
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SEP 01 2005

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE ESTABLISHMENT ) TC05-083  
OF SWITCHED ACCESS REVENUE )  
REQUIREMENT FOR ALLIANCE ) PETITION TO INTERVENE  
COMMUNICATIONS COOPERATIVE, INC. )

Pursuant to ARSD 20:10:01:15.02 MCImetro Access Transmission Services, LLC, ("MCI") by its undersigned counsel petitions the Commission as follows:

1. MCI is a certificated communications company under the jurisdiction of the Commission.

2. Alliance Communications Cooperative, Inc., ("Alliance") has or will file with the Commission its revised switched access separations study intended to provide a foundation for the computation of its intrastate switched access revenue requirement to be incorporated into the LECA access tariff.

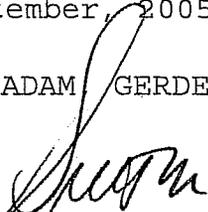
3. MCI verily believes that the Commission's switched access cost model is flawed permitting costs to be overstated, both because of the inappropriate use of known and measurable changes, as well as mistakes in the underlying cost support for the computation. MCI has employed experts to study the Commission's cost model who will examine the cost figures underlying the proposed LECA tariff, including those for petitioner, and conclude that the resulting proposed switched access rates are overstated.

4. MCI recognizes this is a late filed petition for intervention. However, nothing of substance has occurred in this docket and in the LECA switched access rate docket, TC05-096. The questions presented by this intervention and MCI's proposed intervention in the LECA docket constitute a matter of great public interest and a denial of this petition would be detrimental to the public interest and likely to result in a miscarriage of justice. Overstated switched access rates by the Association as a whole would constitute an undue burden upon Petitioner and Petitioner's customers, thus affecting a substantial segment of telephone traffic in the state.

WHEREFORE MCI prays that the Commission permit its intervention and participation in this proceeding to examine and cross-examine witnesses, conduct discovery and offer evidence on its own behalf.

Dated this 1<sup>st</sup> day of September, 2005.

MAY, ADAM GERDES & THOMPSON LLP

BY:   
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CERTIFICATE OF SERVICE

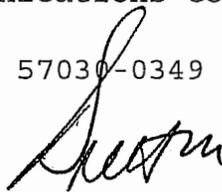
Brett Koenecke of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 1<sup>st</sup> day of September, 2005, he mailed by United States mail, first class postage thereon prepaid, a true and correct copy of the foregoing in the above-captioned action to the following at their last known addresses, to-wit:

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Brett Koenecke