

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

IN THE MATTER OF THE APPLICATION OF)
MIDCONTINENT COMMUNICATIONS FOR)
AN AMENDED CERTIFICATE OF) DOCKET NO. TC15-063
AUTHORITY AND FOR A WAIVER OF)
ARSD 20:10:32:15)

Venture Communications Cooperative’s Petition to Intervene

Venture Communications Cooperative (“Venture”), by and through its undersigned counsel, and pursuant to SDCL 1-26-17.1 and ARSD 20:10:01:15.02 and 20:10:32:04, petitions this Commission for leave to intervene in the above entitled proceeding.

IN SUPPORT THEREOF, Petitioners do state and declare as follows:

1. Venture is a South Dakota cooperative corporation headquartered in Highmore, South Dakota. Venture presently operates twenty-nine (29) local telephone exchanges serving approximately 12,744 access lines in the State of South Dakota. Venture is also a “rural telephone company” as defined in 47 U.S.C. 153(37) and SDCL 49-31-1(22).
2. On August 18, 2015, Midcontinent Communications (“Midcontinent”) filed a Petition with this Commission to amend its certificate of authority to provide local exchange service in the rural exchange areas of Bowdle and Roslyn, South Dakota (the “Petition”)
3. The Petition was received by Venture on or about August 19, 2015. Venture is the incumbent local exchange carrier in both Bowdle and Roslyn rural exchange areas. Pursuant to the provisions of each of SDCL 1-26-17.1 and A.R.S.D. 20:L10:01:15.02 and 20:10:32:04, Venture is entitled to “Intervener Status” in the above entitled proceeding.

4. In its Petition, Midcontinent alleges that it is able to satisfy the local exchange service obligations of an eligible telecommunications carrier under 47 U.S.C. 214(e)(1) as required by A.R.S.D. 20:10:32:10, and should therefore be granted authorization to provide service in the rural areas specified in its Petition. See Petition at page 4.¹ However, Venture does not currently have sufficient information to conclude that all of these requirements are satisfied.

5. Pursuant to 47 C.F.R. 54.101(a) and (b), SDCL 49-31-73, SDCL 49-31-75, and A.R.S.D. 20:10:32:15 this Commission is vested with the authority to grant or deny Midcontinent's Petition.

6. Venture has a direct and substantial interest in these proceeding as this Commission's decision may, directly or indirectly, affect the quality or cost of telecommunications services proved by Venture to its customers.

7. Venture desires to intervene in order that it may fully review the application, receive documents, comment, present testimony, cross-examine witnesses and produce evidence either seeking to clarify or oppose Midcontinent's Petition, to the extent that such actions are required in the above entitled proceeding. Venture seeks to make certain that Midcontinent's Petition fully complies with all legal requirements and Commission orders.

WHEREFORE, Venture respectfully requests that the Commission grant as follows:

A. Venture's Petition to Intervene in the above entitled proceeding with full rights to participate as a formal party; and

B. Such other relief as the Commission may deem proper.

¹ The pages of the Petition are not numbered, but Midcontinent's allegations with regard to 47 U.S.C 214(e)(1) as required by ARSD 20:10:32:15 are contained in Paragraph 8 of the Petition, which is on pages 3-5.

Dated this 14th day of September, 2015.



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