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VIA ECFS

October 3, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Attn: Wireline Competition Bureau

**Re: Notice of Consolidation of Commonly-Owned Study Areas
Interstate Telecommunications Cooperative, Inc.
South Dakota Study Areas 391654 and 391679
CC Docket No. 96-45**

On behalf of Interstate Telecommunications Cooperative, Inc. ("Interstate"), JSI respectfully submits the attached notice of consolidation in CC Docket No. 96-45. The attached provides the Wireline Competition Bureau notice of the consolidation effective January 1, 2020, of the Interstate South Dakota study areas.

Please direct inquiries regarding this filing to the undersigned consultant for the Company.

Sincerely,

John Kuykendall
Vice President

on behalf of

Bryan Roth, CEO
Interstate Telecommunications Cooperative, Inc.

Attachment

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

3440 Blue Springs Rd. NW, Suite 503
Kennesaw, GA 30144
phone: 770-569-2105

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



Interstate Telecommunications Cooperative, Inc.
312 4th Street West, PO Box 920, Clear Lake, SD 57226

October 2, 2019

Ryan Palmer, Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of Consolidation of Commonly-Owned Study Areas
Interstate Telecommunications Cooperative, Inc.
South Dakota Study Areas 391654 and 391679
CC Docket No. 96-45**

Dear Mr. Palmer,

Interstate Telecommunications Cooperative, Inc. ("Interstate" or "Cooperative") is an incumbent local exchange carrier which owns two study areas in the state of South Dakota – Study Area Codes 391654 and 391679. Both study areas operate under the same Cooperative entity, and are recipients of Connect America Fund Broadband Loop Support.

Interstate hereby notifies the Federal Communications Commission ("FCC" or "Commission") that effective January 1, 2020, the Company will consolidate the foregoing study areas with 391654 being the surviving study area. Pursuant to FCC precedent, no prior approval is required when commonly-owned existing study areas in the same state are consolidated.¹

Bryan Roth, CEO

cc: Alexander Minard, FCC
Suzanne Yelen, FCC
Victor Gaither, High Cost Program, Universal Service Administrative Co.
Jeff Phillips, National Exchange Carrier Association

¹ See, e.g., Request for Clarification Filed by the National Exchange Carrier Association, Inc., and Petitions for Waivers Filed by Alaska Telephone Company, Ducor Telephone Company, and Kingsgate Telephone, Inc., Concerning the Definition of "Study Area" in the Part 36 Appendix-Glossary of the Commission's Rules, AAD 95-173, AAD 96-29, AAD 96-51, Memorandum Opinion and Order. 11 FCC Red 8156, 8160 (Com. Carr. Bur. July 16, 1996).