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VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* Presentations
WC Docket No. 18-60, Iowa Network Access Division Tariff FCC No. 1;
WC Docket No. 18-155, Updating the Intercarrier Compensation Regime to Eliminate
Access Arbitrage;
WC Docket No. 13-39, Rural Call Completion

Dear Ms. Dortch:

On June 12, 2018, South Dakota Network, LLC (SDN) met with Pam Arluk, Robin Cohn, Lynn Engledow, Victoria Goldberg, Lisa Hone, Ed Krachmer, Richard Kwiatkowski, Al Lewis, and Doug Slotten of the Wireline Competition Bureau. The meeting was attended on behalf of SDN by Mark Shlanta, CEO; Nancy Johnson, VP; Mary Sisak, counsel; Sal Taillefer, counsel; and the undersigned. At the meeting, SDN discussed matters related to the three above-referenced proceedings.

First, SDN discussed its rebuttal comments filed in WC Docket No. 18-60¹ and repeated its argument that CenturyLink is not the appropriate benchmark for CEA switching service because CenturyLink's tandem switching service is not the same as CEA switching service. Specifically, CenturyLink does not provide centralized equal access functionality. SDN contended that no carrier, with respect to switching, provides the same access service as a CEA provider, other than the three carriers authorized by the Commission to provide this service.

¹ Rebuttal Comments of South Dakota Network, LLC, *In re: Matter of Iowa Network Access Division Tariff FCC No. 1*, WC Docket No. 18-60.

Second, SDN discussed the use of direct interconnection obligations to combat access stimulation. Although SDN agrees with the principle of permitting direct connection in cases where an entity is participating in access stimulation, SDN emphasized that a broader application outside of access stimulation, proposed by CenturyLink,² would undermine CEA networks and would be at cross purposes with the Commission's policy objectives in authorizing them.

Third, SDN briefly discussed the comments filed by Inteliquent on rural call completion.³ SDN relayed that it has experienced similar issues with call rejection as described in Inteliquent's comments,⁴ and is investigating the matter at this time.

Finally, SDN urged the Commission to affirm its ability to enter into contracts for the provision of access services.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Benjamin H. Dickens, Jr.

Counsel to South Dakota Network, LLC

CC: Pam Arluk
Robin Cohn
Lynn Engledow
Victoria Goldberg
Lisa Hone
Ed Krachmer
Richard Kwiatkowski
Al Lewis
Doug Slotten

² See *In re: Updating the Intercarrier Compensation Regime to Eliminate Access Arbitrage*, Notice of Proposed Rulemaking, WC Docket No. 18-155, FCC No. 18-68, released June 5, 2018.

³ Comments of Inteliquent, *In re: Rural Call Completion*, WC Docket No. 13-39, filed June 4, 2018.

⁴ *Id.* at p. 7.