

LAW OFFICES  
**BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP**

BENJAMIN H. DICKENS, JR.  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO  
MARY J. SISAK  
D. CARY MITCHELL  
SALVATORE TAILLEFER, JR.

2120 L STREET, NW  
WASHINGTON, DC 20037  
  
(202) 659-0830  
FACSIMILE: (202) 828-5568

November 26, 2018

ARTHUR BLOOSTON  
1914 – 1999

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES  
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFKY  
OF COUNSEL

EUGENE MALISZEWSKYJ  
ENGINEERING CONSULTANT

WRITER'S CONTACT INFORMATION

[sta@bloostonlaw.com](mailto:sta@bloostonlaw.com)

202-828-5562

**REDACTED – FOR PUBLIC INSPECTION**

**VIA HAND DELIVERY**

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

Re: Notice of *Ex Parte* Presentation, WC Docket No. 18-100; Transmittal No. 13  
South Dakota Network, LLC Tariff F.C.C. No. 1

Dear Ms. Dortch:

On November 21, South Dakota Network, LLC (“SDN”) provided confidential information in response to requests by Commission staff. Pursuant to the Protective Order adopted by the Commission in this proceeding,<sup>1</sup> SDN requests confidential treatment for this information, which is commercially sensitive information that is not normally released to the public. Specifically, SDN provided the attached spreadsheet regarding its total known and measurable investments projected between December 31, 2017 and June 30, 2019.

---

<sup>1</sup> *In the Matter of South Dakota Network, LLC Tariff F.C.C. No. 1*, PROTECTIVE ORDER, WC Docket No. 18-100, et al., DA 18-1158, released November 14, 2018.

In accordance with the Protective Order and the Commission's rules, one redacted copy has been filed via ECFS; one confidential, non-redacted copy has been submitted on paper via hand delivery to the Secretary's Office; and two confidential, non-redacted copies have been submitted on paper via hand delivery to Mr. Christopher Koves.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Sal", with a stylized flourish at the end.

Salvatore Taillefer, Jr.  
Counsel to South Dakota Network, LLC

# REDACTED - FOR PUBLIC INSPECTION

## SOUTH DAKOTA NETWORK NONREGULATED ALLOCATION WORKSHEET INTERSTATE STUDY - KNOWN & MEASURABLE

Line No.	Description	Known & Measurable	Reclass	Common & Power	TPUC (Note 3)	Net	Allocation Basis	Nonregulated Operations	Regulated Operations					
ALLOCATION FACTORS							DIRECT							
1	OFFICE WAGES						DIRECT							
2	PLANT SPEC FIC WAGES													
3	TOTAL WAGES													
3A	RELATIVE USE (MOU)													
PLANT IN SERVICE		(For the period of Jan 1, 2018 to June 30, 2019) - Source see note 1					LINE 3							
4	LAND						LINE 3							
5	MOTOR VEHICLES						LINE 3							
6	OTHER WORK EQUIPMENT						DIRECT							
7	BUILDINGS						LINE 3							
8	FURNITURE						LINE 3							
9	OFFICE SUPPORT EQUIPMENT						LINE 1							
10	COMPANY COMMUNICATIONS EQUIPMENT						LINE 3							
11	GENERAL PURPOSE COMPUTERS						LINE 3							
12	DIGITAL SWITCHING EQUIPMENT						LINE 3A							
13	DIGITAL SWITCHING COMPUTER						DIRECT							
14	CIRCUIT EQUIPMENT						DIRECT							
15	BURIED CABLE						DIRECT							
16	INTANGIBLES						LINE 2							
17	ORGANIZATIONAL COSTS						LINE 3							
18	TOTAL													
DEPRECIATION & AMORTIZATION RESERVES							(For the period of Jan 1, 2018 to June 30, 2019) - Source see note 1					LINE 5		
19	MOTOR VEHICLES											LINE 6		
20	OTHER WORK EQUIPMENT	LINE 7												
21	BUILDINGS	LINE 8												
22	FURNITURE	LINE 9												
23	OFFICE SUPPORT EQUIPMENT	LINE 10												
24	COMPANY COMMUNICATIONS EQUIPMENT	LINE 11												
25	GENERAL PURPOSE COMPUTERS	LINE 12												
26	DIGITAL SWITCHING EQUIPMENT	LINE 13												
27	DIGITAL SWITCHING COMPUTER	LINE 14												
28	CIRCUIT EQUIPMENT	LINE 15												
29	BURIED CABLE	LINE 16												
30	DEPR. INTANGIBLES	LINE 16												
31	AMORT. INTANGIBLES	LINE 16												
32	TOTAL													
Support Assets (Lines 19 through 25)														

# REDACTED - FOR PUBLIC INSPECTION

## SOUTH DAKOTA NETWORK NONREGULATED ALLOCATION WORKSHEET INTERSTATE STUDY - KNOWN & MEASURABLE

Line No.	Description	Known & Measurable	Reclass	Common & Power	TPUC (Note 3)	Net	Allocation Basis	Nonregulated Operations	Regulated Operations
<b>DEPRECIATION &amp; AMORTIZATION EXPENSES</b>		(For the period of Jan 1, 2018 to June 30, 2019) - Source: see note 1							
33	MOTOR VEHICLES						LINE 5		
34	OTHER WORK EQUIPMENT						LINE 6		
35	BUILDINGS						LINE 7		
36	FURNITURE						LINE 8		
37	OFFICE SUPPORT EQUIPMENT						LINE 9		
38	COMPANY COMMUNICATIONS EQUIPMENT						LINE 10		
39	GENERAL PURPOSE COMPUTERS						LINE 11		
40	DIGITAL SWITCHING EQUIPMENT						LINE 12		
41	DIGITAL SWITCHING COMPUTER						LINE 13		
42	CIRCUIT EQUIPMENT						LINE 14		
43	BURIED CABLE						LINE 15		
44	DEPR. INTANGIBLES						LINE 16		
45	AMORT. INTANGIBLES						LINE 16		
46	TOTAL								
Support Assets (Lines 33 through 39)									
<b>PLANT SPECIFIC EXPENSES</b>		(For the period of Jan 1, 2018 to June 30, 2019) - Source: see note 2							
47	LAND & BUILDING EXPENSE						LINE 4,7		
48	FURNITURE & ARTWORK						LINE 8		
49	OFFICE EQUIPMENT EXPENSE						LINE 9		
50	GENERAL PURPOSE COMPUTER EXPENSE						DIRECT		
51	GENERAL PURPOSE COMPUTER EXPENSE - OTHER						DIRECT		
52	MAINTENANCE AGREEMENTS						LINE 12		
53	DIGITAL ELECTRONIC SWITCHING EXPENSE						DIRECT		
56	CIRCUIT EQUIPMENT EXPENSE						LINE 14		
58	CIRCUIT EXPENSE - REDUNDANCY						LINE 15		
59	BURIED CABLE EXPENSE						LINE 15		
60	TOTAL								
General Support (Lines 47 through 52)									
<b>NETWORK OPERATIONS EXPENSES</b>							LINE 12		
61	POWER EXPENSE						LINE 12		
62	NETWORK ADMINISTRATION EXPENSE						LINE 12		
63	TOTAL								
<b>CUSTOMER OPERATIONS EXPENSES</b>							DIRECT		
64	CUSTOMER SERVICES								
65	TOTAL								
66	TOTAL BIG 3 EXPENSES						LINE 60+63+65		

# REDACTED - FOR PUBLIC INSPECTION

## SOUTH DAKOTA NETWORK NONREGULATED ALLOCATION WORKSHEET INTERSTATE STUDY - KNOWN & MEASURABLE

Line No.	Description	Known & Measurable	Reclass	Common & Power	TPUC (Note 3)	Net	Allocation Basis	Nonregulated Operations	Regulated Operations
CORPORATE OPERATIONS EXPENSES									
67	EXECUTIVE DEPARTMENT						LINE 66		
68	PLANNING EXPENSE						LINE 66		
69	ACCOUNT NG & F NANCE						LINE 66		
70	EXTERNAL RELATIONS						LINE 66		
71	HUMAN RESOURCES						LINE 66		
72	LEGAL						LINE 66		
73	OTHER GENERAL AND ADMINISTRATIVE						LINE 66		
74	OTHER EXPENSES						LINE 66		
75	TOTAL						LINE 66		
	Executive & Planning (Lines 67 + 68)								
	General Adm. (Lines 69 through 74)								
	Total								
INTEREST AND OTHER EXPENSE									
(For the period of Jan 1, 2018 to June 30, 2019) - Source see note 2									
76	OPERATING TAXES						LINE 79		
77	OPERATING TAXES-USF						DIRECT		
78	AFUDC (A/C 7340)						DIRECT		
79	INTEREST EXPENSE (A/C 7510)						LINE 79		
NONREGULATED REMOVAL SUMMARY									
80	NET INVESTMENT (Ln18-32)								
81	OPERATING & INTEREST EXPENSE								
82	Excluding wages (Ln46+66+75+76+77+78)								
83	Including wages (Ln3+81)								
Reclassifications									
	CABS Billing								
	Account 6728 to 6623								
	Net								
	FCC Regulatory Fee								
	Account 6728 to 7200								
	Net								

### Notes Source for K&Ms

- 1 Capital Additions for 2018 and 2019 (Known and Measureable Tab)
- 2

<u>ASSET DESCRIPTION</u>	<u>ASSET CLASSIFICATION</u>	<u>EXPECTED PURCHASE DATE</u>	<u>AMOUNT</u>	Support Assets	Circuit	Switching	Buried Cable	Non-SD Study
Corporate Expenditures								
New Vehicles	Motor Vehicles	Jul-18						
IT Hardware	General Purpose Computers	Throughout 2018						
Software	Intangibles	Throughout 2018						
SGX GEO Redundancy	Switching	Sep-18						