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June 17, 2003

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**Ex Parte**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, DC 20002

**Re: Notice of Ex Parte Presentation:  
CC Docket Nos. 95-116, 96-98, 99-68, 96-45, 00-256, 98-77, 98-166**

Dear Ms. Dortch:

On June 16, 2003, the South Dakota Telecommunications Association, Inc., (SDTA) met with Commissioner Adelstein, Lisa Zaina and Scott Bergmann. On behalf of SDTA, Rich Coit, Executive Director and George Strandell, Manager for Golden West Telecommunications Cooperative, Inc., and its counsel, Benjamin Dickens and Mary Sisak were in attendance.

SDTA discussed its comments filed in the universal service proceeding and the CTIA Petition for Declaratory Ruling on local number portability, as reflected in the attachment to this notice. In addition, SDTA discussed its pending request that USAC audit the universal service line counts and support received by Western Wireless Corporation in South Dakota. SDTA also discussed its pending Petitions for Reconsideration of Commission actions on intercarrier compensation for ISP-bound traffic (CC Docket Nos. 96-98 and 99-68), the Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission (CC Docket No. 96-45), and the MAG Plan (CC Docket Nos. 00-256, 96-45, 98-77 and 98-166).

Consistent with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we are filing one electronic copy of this notice in each of the above-captioned proceedings and request that you place it in the appropriate record of those proceedings.

Sincerely,

/s/  
Mary J. Sisak

cc: Lisa Zaina  
Scott Bergmann

Attachment

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**SDTA POSITION ON UNIVERSAL SERVICE**

- I. Support to rural ILECs should be provided based on the actual cost of total facilities.
- II. All lines must be supported.
- III. The identical support rule does not comply with the universal service principles.
  - a. It is not competitively neutral.
  - b. It results in excessive support.
- IV. High cost support should not be based on auctions.
- V. The public interest determination should include a cost/benefit analysis of supporting multiple carriers in rural areas.
  - a. This should include an analysis of whether quality services at affordable rates can continue to be provided by all ETCs if an additional ETC is designated, without relying on an increasing level of support.
  - b. The FCC and states should examine whether support will be used for supported services.
  - c. ETC status should be granted to competitors in rural areas only if they offer service throughout the ILEC's study area.

**SDTA POSITION ON CTIA LNP PETITIONS  
CC DOCKET NO. 95-116**

- I. Grant of CTIA's Petitions would have consequences beyond LNP
  - a. CTIA's petition could force changes in ILEC local calling areas and/or rating of calls, which could impact ILEC revenues.
  - b. CTIA's petition would create an unlawful disparity in numbering portability and give a significant competitive advantage to wireless carriers.
  - c. Interconnection agreements are necessary before number porting to ensure appropriate cost recovery.
  - d. The FCC should retain the bona fide request requirement.
  - e. A short porting interval as requested by CTIA is not possible today and would require significant and costly network modifications
- II. The FCC should implement a rulemaking proceeding to ensure a full analysis of the issues.