

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)

South Dakota Network, LLC Centralized) Transmittal No. 9
Equal Access Service Revised Access Tariff)
Filing)

**COMMENTS OF AT&T CORP.
ON SOUTH DAKOTA NETWORK TARIFF NO. 9**

Pursuant to Section 204(a)(1) of the Communications Act, 47 U.S.C. § 204(a)(1), AT&T Corp. (“AT&T”) respectfully submits these comments in support of the South Dakota Network, LLC (“SDN”) Tariff Transmittal No. 9 filed on March 5, 2014, to be effective March 20, 2014.¹

AT&T commends SDN’s development of Tariff Transmittal Number 9 addressing high volume access traffic. SDN’s proposed tariff reflects an innovative approach for addressing the transport costs that are incurred by interexchange carrier customers of companies engaged in access stimulation in South Dakota. Specifically, the new tariff permits a limited exception to SDN’s provision of tandem switched transport by permitting direct trunk transport for a customer that is terminating high volumes of access minutes to a Routing Exchange Carrier or other entity engaged in Access Stimulation, as defined by the FCC.²

The limited exception for direct transport provided in SDN’s proposed tariff is an attempt to address some of the challenges resulting from Access Stimulation that were not envisioned when centralized equal access networks were originally created to facilitate long distance equal

¹ See South Dakota Network, LLC Transmittal No. 9, F.C.C. Tariff No. 1 (filed Mar. 5, 2014).

² See *Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, paras. 667-78 (2011) (*USF/ICC Transformation Order*), *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011).

access in rural states. In addition, the exception also provides SDN with the ability to continue to serve, as originally intended, its subtending local exchange carriers that are not engaged in Access Stimulation.

Accordingly, AT&T supports SDN's Tariff Transmittal No. 9 and urges the Commission to allow it to go into effect.

Respectfully Submitted,

/s/ Christi Shewman

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Dated: March 12, 2014

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of March, 2014, I caused true and correct copies of the foregoing Comments of AT&T Corp. on SDN Tariff No. 1, Transmittal No. 9, to be served on all parties as shown on the attached Service List.

Dated: March 12, 2014
Washington, D.C.

/s/ Loretta Hill

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