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PUBLIC SERVICE COMMISSION

June 7, 2012

Mr. Darrell Nitschke
Executive Director
North Dakota Public Service Commission
600 East Boulevard Avenue
Bismarck, ND 58505

**RE: MIDCONTINENT COMMUNICATIONS V. MISSOURI VALLEY
COMMUNICATIONS, INC. PU-11-697**

Dear Mr. Nitschke:

Midstate Telephone Company provides telecommunications service to rural customers in Northwest North Dakota. Midstate is experiencing significant demand on its resources as a result of the oil boom in the Bakken Formation, similar to Missouri Valley.

I am familiar with Missouri Valley, and I know they face difficult challenges serving the Williston exchange. I am writing to recommend that the Commission reject the Interconnection Agreement that has been proposed to the Commission through the arbitration process.

Midcontinent bases its request on a purported reading of a recent FCC Declaratory Ruling intended to clarify the interconnection obligations of rural telephone companies. But nothing in that declaratory ruling changes the fact that Federal statute sets forth a stair step system of interconnection obligations for incumbent LECs. Only the highest of those steps includes an obligation to exchange local telecommunications traffic. As a rural telephone company, MVC is exempt from that highest step.

In fact, the FCC clearly states that it is NOT eliminating the protections of the exemption for rural telephone companies. MVC is already providing the level of interconnection required under the Telecom Act and the FCC Declaratory Ruling. A contrary decision by the ND PSC would create dangerous precedent for all rural telephone companies operating in North Dakota.



In short, Midcontinent, in its attempt to bind MVC to an unlawful interconnection agreement, aims to engage in the kind of "cherry picking" that has been contrary to the policies of the ND PSC for many years now.

Please reject this Interconnection Agreement.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Wilhelmi". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark Wilhelmi, General Manager
Midstate Telephone Company