



Northwest Communications Cooperative

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PUBLIC SERVICE COMMISSION

June 12, 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:

Northwest Communications Cooperative is a rural telephone company whose service area adjoins the service area of Missouri Valley Communications. Northwest Communications Cooperative has many of the same challenges that Missouri Valley experiences as a result of the oil boom in Northwest North Dakota. Northwest's trade area includes the Williston exchange, and our company is familiar with the large expansion of economic activity.

I write to recommend that the Commission **not adopt** the interconnection agreement because of the harm and degradation in the quality of service to the rural customers in the Williston Exchange.

The purported goal of Midcontinent's interconnection agreement is to promote telecommunications competition in Williston. The plain truth of the matter is that competition is not only alive but healthy in the Williston exchange today. From a landline perspective, Midco is already competing with MVC via resale. From a wireless perspective, Verizon, AT&T Wireless are battling for market share. From a television programming perspective, MidCo is battling with DirecTV and the Dish network.

As a stark example of this competition, despite the increase in oil activity and associated employment in Williston, the number of landlines in Williston has actually **DECLINED** over the past several years. People moving in from other parts of North Dakota and from across the country are, for the most part, bringing their mobile phones and keeping their existing providers – most notably Verizon and AT&T Wireless. Living in temporary housing such as man camps or in personal recreational vehicles or the like is not, after all, particularly conducive to landline service. Further, Bakken Wireless Internet is

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competing with all of the foregoing providers in the broadband services market. One of the more troubling aspects of this competition, however, is that if the interconnection agreement is approved, Midco would be the only provider capable of providing the so-called "triple play" of voice telephony, data services and television programming – but making available only the 7 square-mile center of the 393 square-mile exchange.

For these reasons, I urge the Commission to reject this interconnection agreement.

Sincerely,

A handwritten signature in blue ink that reads "Mike Steffan". The signature is written in a cursive, flowing style.

Mike Steffan, Interim General Manager/CEO
Northwest Communications Cooperative