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March 14, 2018

North Dakota Public Service Commission  
Attn: Executive Secretary  
Capital Building-12<sup>th</sup> Floor  
600 East Boulevard, Dept. 408  
Bismarck ND 58505-0480



Re: Request for Potential Boundary Change to Serve Individuals Requesting Service from West River Telephone Cooperative

West River Telecommunications Cooperative (WRT) has received requests for broadband service from eight individuals (ten locations) residing close, but just outside of our exchange boundaries in North Dakota. These individuals are currently in areas served by CenturyLink but do not receive broadband access from CenturyLink. WRT is ready to proceed with constructing facilities and provide service to these individuals conditioned upon approval by both the North Dakota Commission and the FCC, and adequate cost recovery for those facilities.

Given the high cost to serve these locations, a business case to do so cannot be made without federal high cost universal service support. In order to receive federal high cost universal service support, WRT must file and the FCC must grant a petition for a study area waiver.

One of the FCC standards for evaluating petitions for a study area waiver is that the state commission having regulatory authority over the transferred exchanges does not object to the transfer. WRT provides the information on the attached for the Commission's consideration.

Sincerely,

Troy Schilling  
CEO/GM  
West River Telecommunication Cooperative

1 **PU-18-90** Filed: 3/19/2018 Pages: 5  
**Application to change exchange boundaries**

West River Telecommunications Cooperative  
Troy Schilling, CEO / GM

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web: www.westriv.com • social: www.facebook.com/myWRT  
mail: PO Box 467 (101 Main St W), Hazen, ND 58545

Offices: Hazen & Beulah, ND • Mobridge, SD

## Attachment

West River Telecommunication Cooperative (WRT) has received requests for service at the locations identified on the attached maps. CenturyLink has agreed to release these areas to WRT if an exchange boundary change is approved by the Commission and by the FCC. The exchange boundaries that would be modified are Mandan (CenturyLink)/St. Anthony (WRT) and Morristown (CenturyLink)/Elgin (WRT) as set forth on the attached map.

The following individuals have requested services from WRT at the locations identified on the map: Clair Hauge, Jamie Hauge, Blue Hill Ranch, Blue Hill Ranch Shop, Danny Hauge, Vern Gores, John Gores, Scott Worseka, Steven Barnhardt, and Jason Thomas.

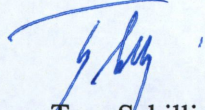
A major consideration for WRT is whether we will receive adequate cost recovery for the transferred lines. It is also important to note there could likely be two separate paths at the FCC in determining whether an exchange area boundary is granted. There is likely to be a separate process for those locations in CAF II auction census blocks and one for those locations outside of CAF II census blocks.

In order to serve locations within the CAF Phase II census blocks, the FCC could require WRT to participate in the CAF Phase II auction. If WRT participates in the CAF Phase II auction and wins, WRT would be required to serve additional locations beyond those identified above. The cost of participating in the auction and serving additional locations may cause WRT to reconsider serving those locations. The locations not in the CAF Phase II census blocks will be subject to the FCC's study area waiver process.

WRT requests conditional approval to serve the locations identified above.

Please call me to discuss any questions you may have.

Sincerely,



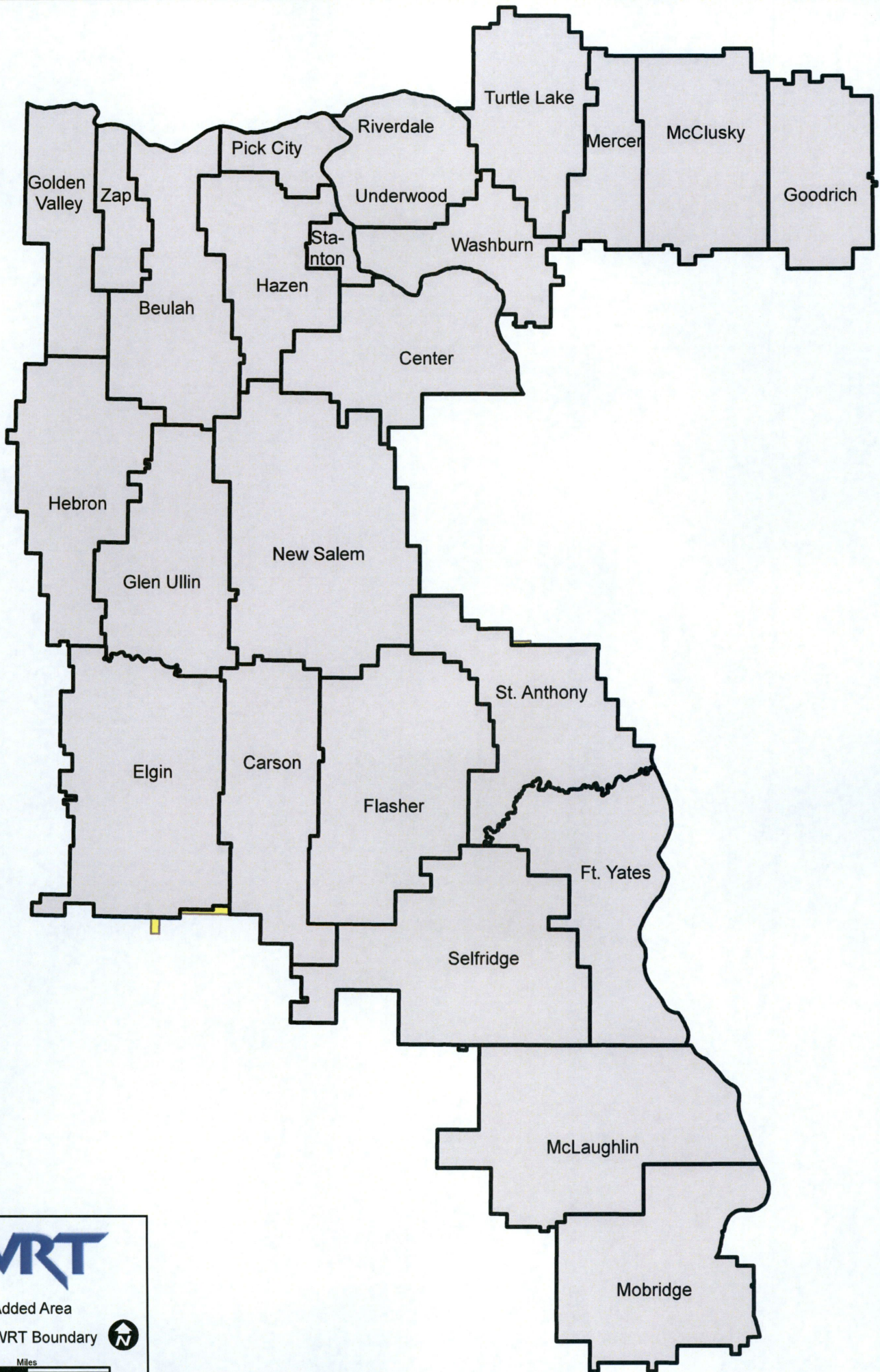
Troy Schilling CEO/GM  
West River Telecommunications Cooperative

CenturyLink hereby concurs with the boundary change as indicated above.

Sincerely,



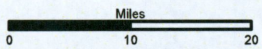
Kent Blickensderfer, Director  
CenturyLink-Legislative & Regulatory Affairs  
North Dakota/South Dakota  
220 N 5<sup>th</sup> Street  
Bismarck, ND 58501



**WRT**

Added Area

WRT Boundary



St. Anthony

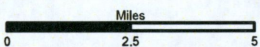
Ft. Yates

ner

**WRT**

Added Area

WRT Boundary



Elgin

Carso

**WRT**

Added Area

WRT Boundary



Miles

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