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7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.isitel.com, e-mail: isi@isitel.com

April 16, 2021

VIA ELECTRONIC FILING

Minnesota Public Utilities Commission
121 7th Place E
Suite 350
St. Paul, MN 55101

Re: Interstate Telecommunications Cooperative, Inc. Petition for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act of 1934 Request for Additional Information from ETC Petitioners.

Docket No. P515/AM-21-180

Dear Sir/Madam:

Please find enclosed on behalf of Interstate Telecommunications Cooperative, Inc. ("Interstate") the addition information request from ETC petitioners' questionnaire and supporting documents/exhibits.

Should you have any questions, please do not hesitate to call me at 301-459-7590.

Sincerely,

/s/ John Kuykendall

John Kuykendall
JSI Vice President

*Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822*

*Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909*

*3440 Blue Springs Rd. NW, Suite 503
Kennesaw, GA 30144
phone: 770-569-2105*

*547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576*

Additional Information Requested from ETC Petitioners

ETC Applicant Name: Interstate Telecommunications		
MPUC Docket Number: P515/AM-21-180		
	Yes (Certify)/No	Additional Information (Attach additional pages as necessary)
1. Please certify the applicant's commitment to meeting the service and performance quality requirements applicable to its support type. See 47 C.F.R. § 54.202(a)(1).	Yes.	Interstate Telecommunications ("Interstate" or "Company") certifies its commitment to meeting the service and performance quality requirements applicable to its support type. See Exhibit 1-1 for additional information.
2. Will the applicant offer standalone voice telephony service? See 47 CFR 54.101(b). Applicants holding an ETC designation in MN should describe, in sufficient detail to understand the offering, their existing voice telephony service offered to customers, including tariff sheets and contracts, proof of making offerings for this service to consumers in their existing census blocks covered by their present ETC designation, and the number of customers using the applicant's offered voice telephony service in both total numbers and as a percent of customers served in the state. Indicate whether the offering for the RDOF census blocks covered by this application will be the same standalone service and if not, describe how it will differ. See 47 CFR 54.101(b).	Yes	Interstate will offer standalone voice telephony service, as required by 47 CFR § 54.101(b). See Exhibit 1-2 for additional information.

<p>3.If so, will the applicant do so through its own facilities, meaning “any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support” or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier)? See 47 CFR 54.201(d)(1).</p>	<p>Yes</p>	<p>Interstate will offer standalone voice telephony service through its own facilities. Voice grade access to the Public Switched Network or its functional equivalent is provided by Interstate using its facilities-based network. Interstate’s use of Calix E7 last mile platform equipment allows IP delivery of voice, gigabit broadband Internet access between its Central Offices in Hendricks and Lake Benton and the customer premise</p>
<p>4.For the voice telephony service, identify the customer point of contact (name, address, contact information), and confirm this contact person is legally authorized to represent the applicant in communications with customers.</p>	<p>Yes - Interstate confirms that the listed contact person is legally authorized to represent Interstate in communications with customers.</p>	<p>James Canaan Support Services Manager Interstate Telecommunications 312 4th St W, Clear Lake, SD 57226 1-800-417-8667 jim.canaan@itccoop.com</p>
<p>5.Does the voice telephony service have "access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems"? See 47 CFR § 54.101(a).</p>	<p>Yes</p>	<p>Interstate will provide access to emergency services through 911 access to the Lincoln County Sheriff’s communications center which serves as the PSAP for all rate centers, as provided in Interstate’s existing operations today. Interstate will provide access to 911 or enhanced 911 to the extent the local government in its service area has implemented 911 or enhanced 911 systems.</p>
<p>7.Please describe the extent to which the offered voice telephony services will be offered at “rates that are equal or lower to the Commission’s reasonable comparability benchmarks for fixed wireline services offered in urban areas.” 47 CFR 54.804(b)(2)(iii).</p>	<p>Yes</p>	<p>Interstate certifies that it will offer voice telephony services at "rates that are equal or lower to the Commission's reasonable comparability benchmarks for fixed wireline services offered in urban areas." See attached Exhibit 1-7 for additional information.</p>
<p>8.Will the applicant satisfy additional requirements applicable to all high-cost ETCs, such as Lifeline obligations? 47 CFR § 54.405</p>	<p>Yes</p>	<p>Interstate certifies that it will satisfy the additional requirements applicable to all high-cost ETCs, such as the Lifeline obligations outlined in 47 CFR § 54.405.</p>

<p>9.If so, will the applicant commit to e-file documentation evidencing the offering of Lifeline service in the required census blocks as required by 47 CFR § 54.405(b).</p> <ul style="list-style-type: none"> a. Current Lifeline providers should provide evidence of prior and current communications, including advertisements and website communications as described in 47 CFR § 54.405(c) for census blocks for which it currently receives support and the number of Lifeline customers being served. b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c). 	<p>Yes</p>	<p>Interstate commits to e-file documentation evidencing its offering of Lifeline service in the required census blocks as required by 47 CFR § 54.405(b). See attached Exhibit 1-9 for additional information.</p>
<p>10.If the answer to question 3 above is through an affiliate or by offering a managed voice solution (including VoIP) through resale of another carrier’s services, identify the other carrier, describe the legal relationship between the applicant and the other carrier, and describe how the other carrier will comply with the requirements listed above.</p>		<p>See Exhibit 1-10 for additional information in response to question.</p>
<p>11.Will the applicant commit to notifying the Minnesota Public Utilities Commission, Minnesota Department of Commerce and the Minnesota Office of the Attorney General if it has failed to meet its milestones for the identified census blocks under the FCC RDOF grant obligations? 47 CFR 54.320(d).</p>	<p>Yes.</p>	<p>Company commits to notifying the Minnesota Public Utilities Commission, Minnesota Department of Commerce and the Minnesota Office of the Attorney General if it has failed to meet its milestones for the identified census blocks under the FCC RDOF grant obligations.</p>