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April 16, 2021

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

Re: **Docket No. P7049/M-21-31**; Application of AMG Technology Investment Group, LLC d/b/a NextLink Internet for Designation as an Eligible Telecommunications Carrier

Dear Mr. Seuffert:

AMG Technology Investment Group, LLC dba NextLink Internet (NextLink Internet or the Company), by its counsel, respectfully submits its attached response to the Minnesota Public Utilities Commission's (Commission's) Notice of Request for Additional Information (Notice). The Commission issued the Notice in PUC Docket No. P999/CI-21-86 on April 5, 2021, to all winning bidders in the Federal Communications Commission's (FCC's) Rural Digital Opportunity Fund Auction who are seeking designation as eligible telecommunications carriers in Minnesota. Additionally, on April 15, 2021, Commission staff provided Request 6 to the Notice, which the Company addresses here.

**Request 6: Please describe how the applicant will remain functional in emergency situations, namely, what is "its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations." 47 CFR § 54.202(a)(2)?**

**Response to Request 6:** As noted in section IV.F. of its Application, NextLink Internet has designed its network with redundancy and resiliency to ensure back-up power and functionality in the event of power loss or other adverse events. Through its redundant network, the NextLink Internet network itself provides its own ability to reroute traffic to other nodes in the event of a failure. NextLink Internet does not rely on another provider to provide the "backup" link as a specific service. Specifically, the company utilizes the following network components:

- **Core** – Each core site has redundant border and core routers as well as redundant Deep Packet Inspection (DPI) devices.

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- **Aggregation** – The aggregation layer is composed of leased dark fiber/Ethernet Private Line (EPL) rings from various providers, permitting rerouting traffic the other direction around the ring in the event of failure. The aggregation sites have an uninterruptible power supply (UPS) and battery backup.
- **Pre-aggregation** – Each tower site has at least two connections to other towers for redundancy, in addition to UPS power.
- **Access** – The access points at tower sites are powered from the access switch that is powered from the UPS.
- **Subscriber Backup** – The UPS provided to subscribers permits up to eight hours of backup time to the subscriber radio and router.

Respectfully submitted,



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Joshua T. Guyan

*Counsel for AMG Technology Investment Group,  
LLC d/b/a NextLink Internet*

**Additional Information Requested from ETC Petitioners**

ETC Applicant Name: AMG Technology Investment Group, LLC d/b/a NextLink Internet		
MPUC Docket Number: P7049/M-21-31		
	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	Yes, please see Section B of NextLink Internet's Application and pages 2-3 of the Company's Information Request Response and ETC Application Supplement (Response and Supplement), filed on April 16, 2021.
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	For additional information, please see footnote 25 of NextLink Internet's Application and page 1 of the Response and Supplement.

<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>N/A</p>	<p>NextLink Internet intends to offer its standalone voice service using its own facilities. It has no intention to resell the services of another carrier. NextLink Internet utilizes interconnection arrangements with Voyant for delivery of its Voice over Internet Protocol (VoIP) voice traffic, but NextLink Internet will not resell Voyant's service.</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>N/A</p>	<p>The following individual is the customer service point of contact for voice telephony service and is legally authorized to represent the applicant in communications with customers: Eric Pyland, Chief Financial Officer AMG Technology Investment Group, LLC d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087 <a href="mailto:epyland@team.nxlink.com">epyland@team.nxlink.com</a></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>For additional information, please see pages 10-11 of NextLink Internet's Application.</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>As described on page 3 of the Response and Supplement, NextLink Internet will offer its voice telephony services at rates that are equal to or less than the reasonable comparability benchmarks for services offered in urban areas, as determined by the Federal Communications Commission (FCC).</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>NextLink Internet will satisfy additional requirements applicable to all high-cost ETCs, including Lifeline obligations.</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"> <li>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.</li> <li>b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c).</li> </ul>	<p>Yes</p>	<p>NextLink Internet is a future Lifeline provider in Minnesota. The Company commits to e-file documentation evidencing the offering of Lifeline service in the required census blocks and, as discussed in Exhibit 6 to its application, all of its advertising of Lifeline services will comply with the requirements of Section 54.405(c) of the FCC’s regulations. Additionally, the Company currently advertises its Lifeline offering on its website, here: <a href="https://nextlinkinternet.com/lp/lifeline/">https://nextlinkinternet.com/lp/lifeline/</a>.</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>N/A</p>	<p>NextLink Internet has no intention to offer its services through resale of another carrier’s services.</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>NextLink Internet commits to notifying the Minnesota Public Utilities Commission, Minnesota Department of Commerce, and Minnesota Office of the Attorney General if it fails to meet its milestones for the identified census blocks under its FCC RDOF grant obligations.</p>