

April 15<sup>th</sup>, 2021

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place, Suite 350  
St. Paul, MN 55101-2147

Re: In the Matter of the Minnesota Public Utilities Information Request sent to all Rural  
Digital Opportunity Fund (RDOF) Grant Winners

Dear Mr. Seuffert:

Attached please find the Arrowhead Electric Cooperative response to the Minnesota Public Utilities  
Commission information request which has been filed in Docket No. P6888/AM-21-52.

Please contact the undersigned if further information is needed at 651-621-8306.

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley  
Consultant for Arrowhead Electric Cooperative

**Additional Information Requested from ETC Petitioners**

ETC Applicant Name: Arrowhead Electric Cooperative		
MPUC Docket Number: P6888/M-21-52		
	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	Arrowhead Electric certifies that it will comply with the service requirements applicable to the support that it receives.
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	Arrowhead will offer standalone voice service. Please see the Arrowhead RDOF ETC application, specifically Exhibit 2 page 11. This page is a copy of the current Arrowhead Electric Cooperative MN Intrastate Tariff and it lists the standalone residential local service rates. The total number of voice customers as of March 1, 2021 was 1,486. This number of voice customers represents 30% of Arrowhead's total customers.  The standalone voice offering for RDOF Customers is the same local service offering in Arrowhead's MN Tariff. Arrowhead Electric's website for internet and voice is: <a href="https://truenorthbroadband.com/">https://truenorthbroadband.com/</a>

<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)(l) .</p>	<p>YES</p>	<p>Arrowhead Electric uses part of its network and resales Consolidated Telephone Company's service to provide local 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>YES</p>	<p>Sara McManus, Member Services Manager, address: Arrowhead Electric Cooperative, 5401 West Highway 61, PO Box 39, Lutsen, MN 55612 . Phone number 218-663-9030. Email: <a href="mailto:smcmanus@arrowhead.coop">smcmanus@arrowhead.coop</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>Arrowhead Electric's standalone voice service includes access to E911 dialing.</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>The local exchange rates offered by Arrowhead Electric are in the range of the announced FCC 2021 Annual Urban Rate Survey Rates. Arrowhead's local service monthly rates are \$15.99 for residential and \$29.99 for business.</p> <p>The 2021 Annual urban rate survey for an unlimited or flat rate local service average rate is \$33.73. The reasonable comparability benchmark for voice services , two standard deviations above the urban average, is \$54.75</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>Arrowhead Electric will make available Lifeline Service to qualifying customers.</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> <p>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.</p> <p>b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c).</p>	<p>YES</p>	<p>Arrowhead Electric is requesting ETC authority in this proceeding. It has stated in its application that it would advertise Lifeline through several channels of distribution including its website, newspaper ads, direct mail and through its member newsletter "The Highline by Line". It will advertise its universal service offering throughout the service area and posted in Lifeline information in its office.</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>YES</p>	<p>Arrowhead Electric is using part of its network and reselling voice services from Consolidated Telephone Company. Arrowhead Electric Cooperative and Consolidated Telephone Company are separate legal entities and not related. Arrowhead purchases services to resell from Consolidated Telephone Company via a contract.</p> <p>Consolidated Telephone Company is an existing ETC in Minnesota and is familiar with all ETC requirements.</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 ROOF grant obligations? 47 CFR 54.320(d).</p>	<p>YES</p>	<p>Arrowhead Electric will notify the Minnesota Public Utilities Commission, Minnesota Department of Commerce, Minnesota Attorney General Office, USAC and the FCC within 10 business days after the applicable deadline if it has failed to meet a build-out milestone.</p>