

April 19th, 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 Wikstrom Telephone Company's response to the Minnesota Public Utilities
Commission information request filed in Docket No. P432/M-21-57.

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

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley
Consultant Wikstrom Telephone Company

Additional Information Requested from ETC Petitioners

ETC Applicant Name: Wikstrom Telephone Cooperative		
MPUC Docket Number: P432/M-21-57		
	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	Wikstrom 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.	<p>Please see the Wikstrom RDOF ETC application, specifically Exhibit 2 page 15. This page is a copy of the current Wikstrom MN Intrastate Tariff and it lists the stand alone residential local service rates.</p> <p>Wikstrom has 6,573 number of voice customers as of April 1st, 2021. This number of voice customers is 81 % of Wikstrom's total customers.</p> <p>Customers in the RDOF area will be offered the same rates for local service that are listed in its MN Intrastate tariff.</p>

<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>Wikstrom will offer voice services in its RDOF Census blocks using its own facilities.</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>The Customer Point of Contact is Carrie Kern-Taggart. Her address is: Wikstrom Telephone Company, 212 Main St. S, Karlstad, MN 56732. Her phone number is: 218-436-5231. Her email address is cak@wiktel.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>Wikstrom's voice service includes access to E911 dialing.</p>
<p>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)?</p>	<p>Yes</p>	<p>See Attachment 1.</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>The local exchange rates offered by Wikstrom are in the range of the announced FCC 2021 Annual Urban Rate Survey Rates. 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>Wikstrom is an authorized ETC by the MN PUC and will meet all the requirements such as lifeline obligations under 47 CFR §54.0405</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>Wikstrom provided samples of its existing Lifeline advertising in MN PUC Docket No. 20-747. Wikstrom advertises lifeline on its website and sends out a yearly customer notice.</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>NA</p>	<p>NA</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>Wikstrom 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>

Attachment 1

Wikstrom Response to Information Request Section 6
From Wikstrom's 481 Filing in 2020

Page 1 of 1

SAC: 961505

State: MN

Wikstrom Tel Co, Inc

Form 481 Line No. 610 Description of Functionality in Emergency Situations

Wikstrom Tel Co, Inc pursuant to MN Rule "7810.390 Emergency Operations" has:

- Established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide:
 - A minimum of four hours of battery service in each central office.
 - A permanently installed power unit in exchanges exceeding 5000 lines.
 - Mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.

- Has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.