

April 19<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 Roseau Electric Cooperative's response to the Minnesota Public Utilities  
Commission information request filed in Docket No. P6996/M-21-67.

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

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley  
Consultant Roseau Electric Cooperative

**Additional Information Requested from ETC Petitioners**

ETC Applicant Name: Roseau Electric Cooperative		
MPUC Docket Number: P6996/M-21-67		
	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	Roseau Electric certifies that it will comply with the service requirements applicable to the support 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 Roseau Electric response in its RDOF ETC Petition, Exhibit 2 page 11. This page is a copy from Roseau Electric's MN Tariff and it lists the monthly rates for local phone service.</p> <p>Roseau's Total Voice customers as of 4/1/2021 is 30. This figure represents 33% of total customers served.</p> <p>Roseau voice offerings in the RDOF areas will be charge the same rates for voice services as listed in the 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)(I ).</p>	<p>YES</p>	<p>In the RDOF Census blocks, Roseau will build and maintain the last mile fiber and customer electronics while Wikstrom Telephone Company will be the underlying provider of Voice Services via resale.</p> <p>Wikstrom Telephone Company has been granted ETC authority and is familiar with the requirements of ETC.</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 contact person is Stacy Rose, Fiber Services Director, <a href="mailto:rose@roseauelectric.co">rose@roseauelectric.co</a>, with an address of Roseau Electric Cooperative, 1107 3<sup>rd</sup> St. N.E. Roseau, MN 56751</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>Roseau Electric provides E911 today and will do so for all voice services offered in the Proposed RDOF Census Blocks. Roseau Electric has an approved 911 from the Minnesota Public Utilities Commission.</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 Roseau Electric are in the range of the announced FCC 2021 Annual Urban Rate Survey Rates.</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>Roseau Electric is an approved ETC for CAF II and will continue to satisfy the Lifeline requirements in its RDOF awarded Census Blocks.</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>Roseau received ETC authority from the Minnesota Public Utilities Commission because it participated in the CAF II auction. Roseau has lifeline information on its website at:  <a href="https://www.northstreamfiber.com/lifeline-telephone-assistance-plan">https://www.northstreamfiber.com/lifeline-telephone-assistance-plan</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>YES</p>	<p>Roseau operates in areas adjacent to Wikstrom Telephone Company. Roseau purchases voice services from Wikstrom. Wikstrom is an authorized ILEC in Minnesota and ETC.</p> <p>Roseau Electric and Wikstrom Telephone Company are two separate companies and are not related. Roseau Electric purchases services by contract from Wikstrom Telephone Company.</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>Roseau 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>

Attachment 1 Response to Section 6 of MN PUC Information Request  
For Roseau Electric Cooperative

From Wikstrom's 481 Filing in 2020

Page 1 of 1

SAC: 361505

State: MN

Wikstrom Tel Co, Inc

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

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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.