

April 19, 2021

Mr. Will Seuffert  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

Re: Notice to Rural Digital Opportunity Fund Grant Winners  
(Docket No. P999/CI-21-86)

Petition of LTD Broadband LLC to Expand its Designation as an Eligible Telecommunications Carrier  
(Docket No. P6995/M-21-133)

Dear Mr. Seuffert:

Please find attached the responses of LTD Broadband LLC to the Commission's Notice of Request for Additional Information, issued April 5, 2021. Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

*/s/ Brett Heather Freedson*

Brett Heather Freedson  
Counsel to LTD Broadband LLC

cc: Service List



**ADDITIONAL INFORMATION REQUESTED FROM ETC PETITIONERS**

ETC Applicant Name: LTD Broadband LLC

MPUC Docket Number: P6995/M-21-133

	<b>Information Request</b>	<b>Yes (certify)/No</b>	<b>Additional Information</b>
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.	
2	Will the applicant offer standalone voice telephony service? See 47 C.F.R § 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 stand-alone service and if not, describe how it will differ. See 47 C.F.R § 54.101(b).	Yes.	At the present time, LTD Broadband provides interconnected VoIP service with the use of analog telephone adapters. LTD Broadband’s tariff specifies a rate of \$24.95/month for standalone voice telephony service, which includes domestic long distance service. LTD Broadband plans to market its standalone voice telephony service on its website, and by direct mail. LTD Broadband’s standalone voice telephony service is not available to all households within the census blocks subject to its current ETC designation. However, LTD Broadband anticipates that will be able to provide stand-alone voice telephony service to 100% of all locations within those census blocks before the end of 2022.
3	If so, will the applicant do so through its own facilities, meaning “any physical components of the telecommunications network that are used in	Yes.	LTD Broadband will provide stand-alone voice telephony service over its own facilities.

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	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 C.F.R § 54.201(d)(1).		
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.	N/A	LTD Broadband Customer Service P.O Box 3064 Blooming Prairie, MN 55917 (507) 369-6669 helpdesk@ltdbroadband.com  All individual available at this location are legally authorized to represent LTD Broadband in communications with customers.
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 C.F.R § 54.101(a).	Yes.	
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,	N/A	To remain functional in emergency situations, LTD Broadband will (i) have available a reasonable amount of back-up power to ensure functionality without an external power source; (ii) maintain the capability to reroute traffic around damaged facilities; and (iii) maintain the capability to manage traffic spikes that may result from an emergency situation.

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	and is capable of managing traffic spikes resulting from emergency situations.” 47 CFR § 4.202(a)(2)?		
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 C.F.R §54.804(b)(2)(iii).	N/A	The stand-alone voice telephony service offered (or to be offered) by LTD Broadband will be at a rate equal to or lower than the FCC’s reasonable comparability benchmark for fixed voice service. Currently, the rate for stand-alone voice telephony service provided by LTD Broadband is \$24.95/month – which is lower than the FCC’s reasonable comparability benchmark for urban areas.
8	Will the applicant satisfy additional requirements applicable to all high-cost ETCs, such as Lifeline obligations? 47 C.F.R § 54.405	Yes.	
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 C.F.R § 54.405(b).  (a) Current Lifeline providers should provide evidence of prior and current communications, including advertisements and website communications, as described in 47 C.F.R § 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 C.F.R § 54.405(c).	Yes.	LTD Broadband will start to advertise for its Lifeline service by direct mail postcards in May 2021. At the present time, LTC Broadband does not provide Lifeline service to any customer in Minnesota.

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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.	N/A	LTD Broadband will use Inteliquent to enable SIP trunking and 911/e-911 functions.
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 C.F.R § 54.320(d).	Yes.	

## VERIFICATION

I, Corey Hauer, CEO of LTD Broadband, LLC (the "Company"), state that I am authorized to make this Verification on behalf of the Company; that the prior responses to of the Company to the Minnesota PUC's Notice of Request for Additional Information was prepared under my direction and supervision; and that the contents therein are true and correct, to he best of my knowledge, information, and belief.

Executed this 16th day of April, 2021.

A handwritten signature in cursive script that reads "Corey Hauer". The signature is written in black ink and is positioned above a solid horizontal line.

Corey Hauer  
CEO, LTD Broadband, LLC

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuenger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

**In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant  
Winners  
Docket Number: P999/CI-21-86**

**In the Matter of the Petition of LTD Broadband LLC to Expand its Designation  
as an Eligible Telecommunications Carrier  
Docket Number: P6995/M-21-133**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19<sup>th</sup> day of April, 2021, I served the attached responses of LTD Broadband LLC to the Commission's April 5, 2021 Notice of Request for Additional Information electronically, to all persons indicated on the attached service list, via the Minnesota Public Utilities Commission's eFiling System.

Respectfully submitted,

*/s/ Brett Heather Freedson*

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