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April 16, 2021

Diane Dietz
Public Utilities Analyst
Minnesota Department of Commerce, Telecommunications
85 - 7th Place East, Suite 280
St. Paul, MN 55101-2198

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 Ms. Dietz:

AMG Technology Investment Group, LLC dba NextLink Internet (NextLink Internet or the Company), by its counsel, respectfully submits its response to Minnesota Department of Commerce Staff's information request, which was served on the Company via email on March 10, 2021, and provides supplemental information for the NextLink Internet's application for designation as an eligible telecommunications carrier (ETC) in Minnesota (the Application).

Information Requests and Responses

Request No. 1: The Federal Rules (i.e., 47 CFR 54.101(b)) require applicants for RDOF designation to show that they will provide stand-alone voice telephony service to customers. What is the monthly rate for stand-alone voice service that your carrier intends to apply to Minnesota customers?

Response: NextLink Internet will offer standalone Voice over Internet Protocol ("VoIP") voice offerings at two rate plans: one for \$19.99 and one for \$24.99. Both plans will include unlimited minutes and the \$24.99 plan also will include other additional features.

Request No. 2: Federal law (i.e., 47 USC 214E(1)(B)) requires applicants for RDOF designation to file a formal plan for advertising the offering and availability of Lifeline. Provide the link and reference to the Lifeline program on your website.

Response: In accordance with the requirement in 47 U.S.C. 214(e)(1)(B) that ETCs advertise the availability of such services and the charges therefor using media of general distribution throughout the service area for which the designation is received, NextLink Internet described on pages 12-13 of its Application the media of general distribution that it intends to use in

April 16, 2021

Minnesota to advertise the services supported by the federal Universal Service Fund, including Lifeline. Additionally, the Company maintains a description of its Lifeline program on its website (nextlinkinternet.com/lp/lifeline), and has placed links to this program description on its residential voice service plan page (nextlinkinternet.com/voice-home-office) and at the bottom of its broadband service plan page (nextlinkinternet.com/internet-plans-residential).

Service Tier at 1000/500 Mbps

NextLink Internet clarifies that it will offer service plans with speeds up to 1000/500 Mbps. In Section IV.B.i of its Application, NextLink Internet specified that it currently “offers retail plans with download speeds of up to 100 Mbps in areas where the Company is offering (or will offer) service supported by [Connect America Fund (CAF) Phase II] support.”¹ It further stated that, “[i]n areas supported by [Rural Digital Opportunity Fund (RDOF)] funding, the Company expects to offer plans with download speeds up to 100 Mbps.”² In **Exhibit 5** to the Application, which describes NextLink Internet’s current service plan offerings, the Company stated the following:

The Company offers a compelling selection of Internet access service plans, with a range of upload/download speeds tailored to accommodate the needs of a diverse customer base. Retail plans currently offer speeds ranging from 5/1 Mbps to 100/20 Mbps. In select locations, the Company offers tailored commercial arrangements for Internet services at speeds up to 1000/1000 Mbps and greater, depending on need and application. The Company’s VoIP service plans are available on a standalone basis or as bundled with Internet services, starting at \$19.95 per month.

NextLink Internet has not finalized its service plans for the areas in Minnesota where it is seeking ETC designation. However, the Company plans to offer the same residential and business plans it currently offers in existing states where the Company operates. These service plans include speeds that are equal to or greater than its commitments under the RDOF funding and a standalone voice offering. The appended materials describe the Company’s current service plans.

As noted in **Exhibit 5**, NextLink Internet currently offers business service plans with speeds up to 1000/1000 Mbps, and it intends to offer residential service plans with speeds that are equal to or greater than its commitments under the RDOF funding. Accordingly, Section IV.B.i of the Application should be modified to reflect that NextLink Internet will offer residential subscribers service speeds up to 1000/500 Mbps. Additionally, the table in the next section below describes the residential broadband service plans that NextLink Internet anticipates offering to Minnesota subscribers in the

¹ Application at 9.

² *Id.* at 9.

April 16, 2021

Company's RDOF service territory, including a service plan with speeds up to 1000/500 Mbps. The standalone voice service offerings will be those included in **Exhibit 5**.

Offerings Consistent with the Broadband Benchmarks

NextLink Internet clarifies that it will offer service plans with the required benchmark rates for broadband in the FCC's urban rate survey.³ **Exhibit 5** reflects the standard retail rates that NextLink Internet currently offers for services that are unsupported by federal high-cost funds in states where the Company currently operates and are not consistent with the benchmark rates. Upon initiating service in Minnesota supported by the RDOF, the Company will offer service plans with rates that are consistent with the broadband benchmarks. While NextLink Internet has not finalized its service offerings for Minnesota, it anticipates that it will offer the following plans that are subject to the benchmarks:

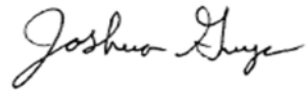
Service Plan	Description	Retail Rate
Standalone VoIP Service Offerings		
Residential Standard	Unlimited minutes	\$19.95
Residential Select	Unlimited minutes with additional features	\$24.95
Standalone Internet Services		
25/5 Mbps	Unlimited data	\$89.95
35/7 Mbps	Unlimited data	\$98.00
50/10 Mbps	Unlimited data	\$105.00
100/20 Mbps	Unlimited data	\$108.00
300/60 Mbps	Unlimited data	\$123.00
500/100 Mbps	Unlimited data	\$127.00
1000/500 Mbps	Unlimited data	\$134.00
Bundled VoIP and Internet Service Offerings		
VoIP + 25/5 Mbps Internet	Unlimited minutes and data	\$109.95
VoIP + 35/7 Mbps Internet	Unlimited minutes and data	\$118.00
VoIP + 50/10 Mbps Internet	Unlimited minutes and data	\$125.00
VoIP + 100/20 Mbps Internet	Unlimited minutes and data	\$128.00
VoIP + 300/60 Mbps Internet	Unlimited minutes and data	\$143.00
VoIP + 500/100 Mbps Internet	Unlimited minutes and data	\$147.00
VoIP + 1000/500 Mbps Internet	Unlimited minutes and data	\$154.00

³ See Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers, WC Docket No. 10-90, Public Notice, DA 20-1409 (Nov. 30, 2020).

April 16, 2021

Additionally, **Exhibit 6** to the Application contains the Company's sample marketing materials, but the actual marketing materials that the Company will use when it begins offering service in RDOF territories will reflect the service plans and rates NextLink Internet anticipates providing, as detailed in the table above.

Respectfully submitted,



Joshua T. Guyan

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LLC d/b/a NextLink Internet*