

April 12<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 Reply Comments of Winnebago Cooperative Telecom Association  
RDOF ETC application MPUC Docket No. 21-86 and Docket No. 21-92

Dear Mr. Seuffert:

Attached please find the Reply Comments of Winnebago Cooperative Telecom Association.

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

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley  
Consultant for Winnebago Cooperative Telecom Association



# Winnebago Cooperative Telecom Association

704 E Main St · Lake Mills, IA 50450 | 641.592.6105 | [www.wctatel.net](http://www.wctatel.net)

April 12<sup>th</sup>, 2021

Dear Mr. Seuffert,

These Reply Comments are provided on behalf of Winnebago Cooperative Telecom Association (the "Company") in response to the March 26, 2021 Initial Comments of the Department of Commerce ("Department Comments") and the March 26, 2021 Initial Comments of the Attorney General ("OAG Comments") pertaining to designation eligibility for Rural Digital Opportunity Fund Phase I ("RDOF Phase I").

The Company is an Incumbent Local Exchange Carrier ("ILEC") and a Competitive Local Exchange ("CLEC") previously authorized by the Commission to provide LEC service in Minnesota and an Eligible Communications Carrier ("ETC") previously certified by the Commission.

As an ILEC and a CLEC, the Company is already subject to Minnesota statutes and to the Commission's rules and requirements relating to provision of telephone service in Minnesota. These obligations include rules and requirements relating to: (1) consumer protections; (2) provision of stand-alone voice service; and (3) service area expansions. As an ETC, the Company is also already subject to all federal requirements pertaining to Tribal Engagement and Lifeline.

The Company also has an established record of meeting all LEC service obligations and all obligations of an ETC.

In light of these facts, the Company does not object to recommendations in the Department Comments and the OAG Comments to impose obligations to meet existing Commission rules and requirements and federal requirements on entities that receive designation from the Commission as an ETC for RDOF Phase I support.

The Company does oppose recommendations in the OAG Comments that would impose additional obligations on entities with an established track records of meeting LEC service and ETC obligations. The recommendations that the Company opposes for established providers are the OAG recommendations that ETCs:

- Develop a consumer service inquiry process;
- Provide network buildout updates for the first two years of RDOF Phase I support; and
- Monitor open Commission ETC-related proceedings for additional obligations that may arise after the receipt of an RDOF Phase I ETC designation.

There is no need to impose any of these additional obligations at this time since none would become applicable at this early phase of the RDOF Phase I process. Further, the cost and feasibility of adopting these additional obligations, and the need for such processes with established LECs, are far from clear. As such, consideration of these obligations should not be part of this initial designation process.

The Company appreciates the opportunity to provide these Reply Comments.

Respectfully submitted

Winnebago Cooperative Telecom Association  
Mark Thoma - CEO