



Will Seuffert Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place E, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of the Petition of LTD Broadband LLC to Expand its Designation
as an Eligible Telecommunications Carrier, Docket No:___

Dear Mr. Seuffert:

Enclosed via efileing, please find the Original Filing, Summary of Filing, and
Petition for Expansion as an Eligible Telecommunications Carrier, and Affidavit of
Service in the above-entitled docket on behalf of LTD Broadband LLC.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'K. Twomey', written over a light blue horizontal line.

Kristopher E. Twomey

Counsel to LTD Broadband LLC

Law Office of Kristopher E. Twomey, P.C.
1725 I Street, NW, Suite 300
Washington, DC 20006
202.681.1850 kris@lokt.net

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

Katie Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Petition of LTD
Broadband LLC for Expansion as an
Eligible Telecommunications Carrier

MPUC Docket No.: _____

ORIGINAL FILING

LTD Broadband LLC (“LTD”) requests the Minnesota Public Utilities Commission (“Commission”) for an expansion of its designation as an Eligible Telecommunications Carrier (“ETC”) through areas awarded to LTD in the Federal Communications Commission (“FCC”) Rural Digital Opportunity Fund Auction (“RDOF”) where the Commission has not designated LTD as an Eligible Telecommunications Carrier.

The filing includes the following attachments:

- | | |
|----------------------------|--|
| Attachment 1
with Minn. | One paragraph summary of the filing in accordance

Rules part 7829.1300. |
| Attachment 2 | Petition of LTD Broadband for Expansion to its
Designation as an Eligible Telecommunications Carrier,
which contains a description of the filing, the impact on
Petitioner and affected ratepayers, and the reasons for the
filings, provided in accordance with Minn. Rules pt.
7829.1300, subp. 4(F). |

In addition, the following information is provided, in accordance with Minn. Rules pt. 7829.1300, subp. 4:

Utility:	LTD Broadband LLC PO Box 3064 Blooming Prairie, MN 55917
Date of Filing	February 17, 2021
Controlling Statute for Time Processing the Filing	Minn. Rules part 7811.1400, subp. 12

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In the Matter of the Petition of LTD
Broadband LLC for Expansion to its
Designation as an Eligible
Telecommunications Carrier

MPUC Docket No.: _____

SUMMARY OF FILING

LTD Broadband LLC (“LTD”) requests the Minnesota Public Utilities Commission grant an expansion of its designation as an Eligible Telecommunications Carrier (“ETC”) for new census blocks where the Commission has not designated LTD as an Eligible Telecommunications Carrier.

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In the Matter of the Petition of LTD
Broadband LLC for Expansion of its
Designation as an Eligible
Telecommunications Carrier

MPUC Docket No.: _____

**PETITION FOR EXPANSION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER**

LTD Broadband LLC became an ETC eligible to receive universal service support on February 8, 2019 in Docket No. P-6995/M-18-653 for census block groups that the FCC awarded Connect American Fund II grants. In this petition, LTD requests expansion of its ETC service area for nine hundred fifty (950) census block groups (“CBG”) awarded to LTD in the FCC Rural Digital Opportunity Fund Auction 904 (“RDOF”). The list of RDOF CBGs is provided in Exhibit 1. LTD was awarded 102,005 locations and awarded a total of \$31,187,793.64 in federal universal service fund high-cost support.

In support of its Petition, LTD states as follows:

- A. The legal name, address and telephone number of the Petitioner and its designated contact person are as follows:

Corey Hauer
PO Box 3064
Blooming Prairie, MN 55917
507 369-2669
coreyhauer@ltdbroadband.com

LTD is represented in connection with this petition by its counsel:
Kristopher Twomey
Law Office of Kristopher E. Twomey, P.C.
1725 I Street, NW, Suite 300
Washington, DC 20006
202 681-1850
kris@lokt.net

- B. The name and title of the officer or representative of LTD authorizing this petition is Corey Hauer, Chief Executive Officer, whose signature appears at the end of this petition.

- C. The proposed effective date of designation of eligibility to receive Universal Service Support is immediately upon the Commission's issuance of an Order approving this Petition.

- D. The service areas by county (“Proposed RDOF Census Blocks”) for which additional ETC designation is attached as Exhibit 1.

- E. LTD’s Petition for expansion of its designation as a ETC for the Proposed RDOF CensusBlocks is consistent with the public interest, convenience and necessity, and satisfies therequirements for receiving universal service support under state and federal law, for the following reasons:

LTD POSSESSES THE INTENT AND CAPABILITY OF PROVIDING SERVICE UPON REASONABLE CUSTOMER REQUEST THROUGHOUT THE SERVICE AREA

- 1. LTD’s Regulatory Authority –The Commission granted LTD’s authority for ETC status on February 8, 2019 in Docket No. P-6995/M-18-653.

- 2. LTDs Facilities and Commitment to Serve - LTD will provide broadband and voice over IP services over RDOF funded and installed fiber-optic facilities to customer premises. LTD is committed to provide service to all customers making a reasonable request for service. LTD certifies that it will: (a) provide service on a timely basis to requesting customers within the Service Area where LTD’s network already passes the potential customer’s premises and (b) provide service within a reasonable period of time, if the potential

customer is within the Service Area but not passed by LTD's current network facilities if service can be provided at reasonable cost by constructing network facilities.

3. LTD's Basic Universal Service Offering - LTD will provide voice over IP telephony in the Service Area. LTD has the ability and the intention to provide the voice telephony services required by 47 CFR §54.101(a).¹

i. Voice grade access to the public switched telephone network

In its *USF/ICC Transformation Order*, the FCC modified the definition of a supported service to a technologically-neutral approach, allowing companies to provision voice service over any platform, including the PSTN and IP networks.² Thus, the FCC amended Section 54.101 to specify that the functionalities of eligible voice telephony services include voice grade access to the public switched network or its functional equivalent.³ The FCC further explained that increasingly “consumers are obtaining voice services not through traditional means but instead through interconnected VoIP providers offering service over broadband networks.”⁴ Interconnected VoIP services “allow customers to make

¹ FCC Rule 54.101, as modified at 47 CFR 54.101 (a) (1) states that “[E]ligible voice telephone services must provide voice grade access to the public switched network or its functional equivalent.”

² *In the Matter of Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, 26 FCC Rcd 17663, 17692-93 (2011) (“*USF/ICC Transformation Order*”).

³ *Id.*; See also 47 C.F.R. §54.101(a).

⁴ *USF/ICC Transformation Order* at ¶63.

real-time voice calls to, and receive calls from, the PSTN, and increasingly appear to be viewed by consumers as substitutes for traditional voice telephone services.”⁵ Thus, the FCC concluded that its authority to promote universal services in this context “does not depend on whether interconnected VoIP services are telecommunications services or information services under the Communications Act.”⁶ LTD Broadband will therefore provide voice-grade access to the PSTN by providing interconnected VoIP service throughout the designated service area.

ii. Minutes of Use

“Local usage” means an amount of minutes of use of exchange services, prescribed by the FCC, provided free of charge to end users.”⁷ The FCC has not specified a minimum amount of local usage that an ETC must offer. LTD Broadband will meet the local usage requirement by including local usage in its rate plans. The Company will comply with any minimum local usage requirements adopted by the FCC or this Commission.

iii. Access to emergency services

ETCs are required to provide access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911 (“E911”), to the extent the local government in an ETC's service area has implemented 911 or enhanced 911 systems. LTD Broadband will provide access to emergency services by providing 911 and E911 for all of its customers

⁵ *Id.*

⁶ *Id.*

⁷ 47 C.F.R. § 54.101(a)(2).

to the extent that the local governments in its designated service areas have implemented 911 and E911.

iv. Toll limitation for Qualifying Low-Income Consumers

LTD Broadband does not distinguish between toll and non-toll for its voice offering. To the extent LTD Broadband offers a service that distinguishes between toll and non-toll calls, it will offer toll limitation to qualifying low-income consumers at no additional charge.

The universal service offering will be made available throughout the Proposed Service Area upon its designation as ETC. LTD Lifeline terms and conditions address customer eligibility provisions and the availability of subsidies under the Lifeline program and the Minnesota Telephone Assistance Plan. LTD is committed to providing the supported services throughout the Service Area to all customers who make a request for such services if service can be provided at reasonable cost by constructing network facilities. LTD's voice telephony plans include local, intrastate interexchange, and interstate long distance all inclusive.

LTD's Advertising Plan

LTD Broadband will advertise the availability of the Supported Services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services.

LTD Broadband agrees to comply with all form and content requirements, if any, promulgated by the FCC and this Commission in the future and required of all designated ETCs, including by disclosing the Applicant's name, that the

service is a Lifeline service, that it is a government assistance program, that the service is non-transferable, and that it is available only to eligible consumers and limited to one discount per economic household.

LTD's 10-Year Plan for Use of Universal Service Support

LTD will receive Federal Universal Service Fund High Cost Support and Lifeline support to the extent it serves customers eligible for the Lifeline program.

LTD's Ability to Remain Functional in Emergency Situations

LTD Broadband will provision service with sufficient back-up power to remain functional without an external power source in emergency situations. LTD Broadband is able to re-route traffic around damaged facilities and will be able to manage traffic spikes resulting from emergency situations. Applicant uses battery back-up power in the field and battery backup power at its NOC for internet service. LTD Broadband's VoIP service requires an Internet Protocol (IP) connection to the Company's network or public Internet and 120VAC power to function. In the event of a failure of the IP connection or the local AC power, the service, including the E911 feature, will not function. Upon activation of a customer, LTD Broadband will provide the customer with a notification containing clear instructions on the use of emergency services.

LTD Broadband will satisfy consumer protection and service quality standards.

Upon designation as an ETC to additional areas, LTD Broadband will satisfy all consumer protection and service quality standards as provided in 47 C.F.R § 54.202(a)(3), as well as all applicable state specific consumer protection and service quality standards.

Designation of LTD Broadband will serve the public interest

Designation of LTD Broadband as an ETC will serve the public interest by facilitating the FCC's goal of developing voice and broadband networks in rural, high-cost areas. Under the 1996 Act, "upon request and consistent with the public interest, convenience and necessity" the Commission shall "designate more than one common carrier as an eligible telecommunications carrier for a service area designated" by the Commission.⁸ Before such a designation, the Commission shall find that the designation is in the public interest.⁹ In its *2005 ETC Order*, the FCC determined that the benefits of increased consumer choice, and the unique advantages of the applicant's service offering are components of a public interest analysis.¹⁰

Expedited designation of LTD Broadband will serve the public interest by ensuring that the company is eligible to receive federal USF support, including through the FCC's high-cost programs. LTD Broadband will use this funding to directly advance the FCC's goal of deploying voice and broadband-capable networks in rural, high-cost areas while ensuring that rural consumers and anchor institutions benefit from innovations in communications technology. In particular, LTD

⁸ 47 C.F.R. 54.201(c).

⁹ Id.

¹⁰ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, FCC 05-46, 20 FCC Rcd 6371, 6389 (rel. Mar. 15, 2005) ("2005 ETC Order").

Broadband will use federal USF support to expand access to high-speed, high-quality broadband and voice provided through interconnected VoIP and fiber optic broadband for rural residents and businesses. These advanced communications services will provide important connectivity to consumers, businesses, and community anchor institutions, including rural schools, libraries and medical facilities and are a unique alternative to services provided by traditional wireline carriers within the Company's designated service area.

Designation of LTD Broadband as an ETC is also in the public interest because it will promote increased competitive choice, thereby increasing innovation and incenting other carriers to improve their existing networks in order to remain competitive. This will result in greater access to high-speed broadband and voice services, as well as improved service quality for residents of underserved communities in RDOF-eligible areas of the state. LTD Broadband's services will provide consumers with additional choices in communications service providers, as well as a variety of service offerings at competitive rates.

Relief Requested

For the reasons set forth above, LTD Broadband respectfully requests: (i) an expeditious Order designating the Company as an ETC for the purpose of being eligible to receive federal funding pursuant to the FCC's Lifeline program; and (ii) such other relief as this Commission deems to be just and equitable.

Respectfully submitted,



Kristopher E. Twomey
Counsel to LTD Broadband

February 17, 2021

VERIFICATION

The undersigned, Corey Hauer, Chief Executive Officer of LTD Broadband LLC, certifies under penalty of perjury that he has reviewed this Petition and the facts stated therein, of which he has personal knowledge, and that the same are true and correct to the best of his present knowledge and belief.

Respectfully submitted,

LTD Broadband LLC

By: /s/Corey Hauer
Corey Hauer
Chief Executive Officer

Exhibit 1

RDOF Census Block Groups by County

St. Louis	271370114002	St. Louis	271370002004
St. Louis	271370155003	St. Louis	271370136001
St. Louis	271370151001	St. Louis	271370105001
St. Louis	271370154002	St. Louis	271370104002
St. Louis	271370155001	St. Louis	271370141001
St. Louis	271370155002	St. Louis	271370128003
St. Louis	271370155004	St. Louis	271370140001
St. Louis	271370106001	St. Louis	271370121002
St. Louis	271370112004	St. Louis	271370038003
St. Louis	271370113002	St. Louis	271370003001
St. Louis	271370112001	St. Louis	271370122003
St. Louis	271370113003	St. Louis	271370103003
St. Louis	271370113001	St. Louis	271370158002
St. Louis	271370151002	St. Louis	271370103002
St. Louis	271370114003	St. Louis	271370133004
St. Louis	271370154003	St. Louis	271370132001
St. Louis	271370154001	St. Louis	271370128001
St. Louis	271370111001	St. Louis	271370132002
St. Louis	271370152004	St. Louis	271370126006
St. Louis	271370114001	St. Louis	271370153005
St. Louis	271370114004	St. Louis	271370121004
St. Louis	271370139003	St. Louis	271370130001
St. Louis	271370152003	St. Louis	271370128002
St. Louis	271370139001	St. Louis	271370141002
St. Louis	271370136002	St. Louis	271370133002
St. Louis	271370127001	St. Louis	271370103001
St. Louis	271370151003	St. Louis	271370124001
St. Louis	271370152002	St. Louis	271370132004
St. Louis	271370154004	St. Louis	271370126005
St. Louis	271370106002	St. Louis	271370134004
St. Louis	271370121005	St. Louis	271370124005
St. Louis	271370139002	St. Louis	271370126003
St. Louis	271370134001	St. Louis	271370135003
St. Louis	271370151004	St. Louis	271370140002
St. Louis	271370105002	St. Louis	271370106004
St. Louis	271370104001	St. Louis	271370101003
St. Louis	271370121001	St. Louis	271370124004
St. Louis	271370134003	St. Louis	271370153004
St. Louis	271370102001	St. Louis	271370007003
St. Louis	271370134002	St. Louis	271370123001
St. Louis	271370111004	St. Louis	271370130003
St. Louis	271370121003	St. Louis	271370138003
St. Louis	271370106003	St. Louis	271370001001

St. Louis	271370138002	Carlton	270170704001
Pine	271159501001	Carlton	270170701002
Pine	271159502001	Carlton	270170705005
Pine	271159504001	Carlton	270170702003
Pine	271159505003	Carlton	270170701005
Pine	271159506003	Le Sueur	270799503001
Pine	271159503002	Le Sueur	270799505003
Pine	271159502002	Le Sueur	270799501004
Pine	271159506001	Le Sueur	270799504003
Pine	271159503001	Le Sueur	270799504001
Pine	271159505001	Le Sueur	270799506002
Pine	271159508002	Le Sueur	270799506003
Pine	271159501002	Le Sueur	270799506004
Pine	271159507001	Le Sueur	270799502004
Pine	271159504002	Le Sueur	270799506001
Pine	271159505002	Le Sueur	270799504002
Pine	271159507002	Le Sueur	270799501003
Aitkin	270017704003	Le Sueur	270799504004
Aitkin	270017905011	Le Sueur	270799505002
Aitkin	270017701001	Le Sueur	270799505001
Aitkin	270017702001	Le Sueur	270799502001
Aitkin	270017704001	Le Sueur	270799503003
Aitkin	270017905023	Le Sueur	270799503002
Aitkin	270017703002	Morrison	270977802004
Aitkin	270017905022	Morrison	270977805003
Aitkin	270017703003	Morrison	270977805002
Aitkin	270017703001	Morrison	270977802002
Carlton	270170706001	Morrison	270977808001
Carlton	270170706004	Morrison	270977803003
Carlton	270170704004	Morrison	270977808002
Carlton	270170706002	Morrison	270977804001
Carlton	270170705003	Morrison	270977804002
Carlton	270170704003	Morrison	270977803002
Carlton	270170705001	Morrison	270977802003
Carlton	270170704002	Morrison	270977805001
Carlton	270170703003	Morrison	270977803005
Carlton	270170703002	Morrison	270977802001
Carlton	270170703001	Morrison	270977803004
Carlton	270170702002	Morrison	270977805004
Carlton	270170704005	Morrison	270977808003
Carlton	270170701004	Morrison	270977804003
Carlton	270170701001	Morrison	270977806001
Carlton	270170702001	Morrison	270977807002

Kanabec	270654801002	Goodhue	270490803001
Kanabec	270654801001	Goodhue	270490802003
Kanabec	270654802003	Goodhue	270490806001
Kanabec	270654804003	Todd	271537903003
Kanabec	270654804002	Todd	271537904003
Kanabec	270654804004	Todd	271537905003
Kanabec	270654802001	Todd	271537904001
Kanabec	270654804001	Todd	271537907004
Kanabec	270654801003	Todd	271537905001
Kanabec	270654802002	Todd	271537905002
Kanabec	270654803003	Todd	271537904002
Blue Earth	270131714002	Todd	271537907001
Blue Earth	270131714001	Todd	271537906002
Blue Earth	270131715001	Todd	271537906001
Blue Earth	270131709001	Todd	271537907002
Blue Earth	270131713002	Todd	271537901003
Blue Earth	270131701001	Todd	271537902003
Blue Earth	270131710001	Todd	271537901002
Blue Earth	270131713003	Kandiyohi	270677811001
Blue Earth	270131709002	Kandiyohi	270677811002
Blue Earth	270131713001	Kandiyohi	270677812003
Blue Earth	270131709003	Kandiyohi	270677801002
Blue Earth	270131701002	Kandiyohi	270677812001
Blue Earth	270131702001	Kandiyohi	270677812002
Blue Earth	270131702002	Kandiyohi	270677801001
Blue Earth	270131710002	Kandiyohi	270677806001
Blue Earth	270131703001	Kandiyohi	270677804001
Blue Earth	270131715002	Kandiyohi	270677804002
Blue Earth	270131715003	Kandiyohi	270677811003
Blue Earth	270131701003	Kandiyohi	270677802001
Blue Earth	270131708001	Kandiyohi	270677802003
Goodhue	270490807001	Kandiyohi	270677807001
Goodhue	270490807002	Kandiyohi	270677806003
Goodhue	270490805001	Kandiyohi	270677805001
Goodhue	270490805003	Kandiyohi	270677805002
Goodhue	270490805002	Kandiyohi	270677806002
Goodhue	270490804001	Mille Lacs	270959703001
Goodhue	270490808001	Mille Lacs	270959703002
Goodhue	270490807003	Mille Lacs	270951704002
Goodhue	270490806003	Mille Lacs	270951705001
Goodhue	270490802006	Mille Lacs	270951706002
Goodhue	270490806002	Mille Lacs	270951704001
Goodhue	270490803002	Mille Lacs	270951704003

Mille Lacs	270951706001	Dakota	270370609061
Mille Lacs	270951705003	Dakota	270370607391
Mille Lacs	270959701001	Dakota	270370607452
Mille Lacs	270959702002	Dakota	270370610011
Mille Lacs	270951707001	Dakota	270370611051
Yellow Medicine	271739701005	Dakota	270370606033
Yellow Medicine	271739703001	Dakota	270370608213
Yellow Medicine	271739702003	Dakota	270370604021
Yellow Medicine	271739702003	Dakota	270370608212
Yellow Medicine	271739703002	Dakota	270370601043
Yellow Medicine	271739703002	Dakota	270370606032
Yellow Medicine	271739701004	Dakota	270370605083
Yellow Medicine	271739704001	Dakota	270370611082
Yellow Medicine	271739704001	Dakota	270370605031
Yellow Medicine	271739704003	Dakota	270370607352
Yellow Medicine	271739703003	Dakota	270370607451
Yellow Medicine	271739703003	Dakota	270370607441
Yellow Medicine	271739702002	Dakota	270370609041
Yellow Medicine	271739702001	Dakota	270370605055
Yellow Medicine	271739702001	Dakota	270370607271
Yellow Medicine	271739701002	Dakota	270370605034
Yellow Medicine	271739701001	Dakota	270370607411
Yellow Medicine	271739701001	Dakota	270370607172
Yellow Medicine	271739701003	Dakota	270370605082
Dakota	270370615012	Dakota	270370605091
Dakota	270370614021	Dakota	270370611083
Dakota	270370615021	Dakota	270370611052
Dakota	270370610012	Dakota	270370607211
Dakota	270370615011	Dakota	270370604012
Dakota	270370614022	Dakota	270370605093
Dakota	270370610031	Dakota	270370607491
Dakota	270370609051	Dakota	270370611072
Dakota	270370607171	Dakota	270370611021
Dakota	270370607102	Dakota	270370607341
Dakota	270370606051	Dakota	270370607421
Dakota	270370609021	Dakota	270370611022
Dakota	270370605081	Dakota	270370607462
Dakota	270370608203	Dakota	270370607371
Dakota	270370607262	Dakota	270370606042
Dakota	270370607253	Dakota	270370607212
Dakota	270370603011	Isanti	270591301002
Dakota	270370607481	Isanti	270591302002
Dakota	270370607393	Isanti	270591301001

Isanti	270591306002	Martin	270917906001
Isanti	270591304002	Martin	270917903002
Isanti	270591304003	Martin	270917901002
Isanti	270591301004	Martin	270917905001
Isanti	270591305011	Martin	270917902003
Isanti	270591306003	Martin	270917906002
Isanti	270591305012	Martin	270917906003
Isanti	270591301003	Stearns	271450109002
Isanti	270591304001	Stearns	271450109003
Isanti	270591306001	Stearns	271450104032
Isanti	270591303021	Stearns	271450111004
Isanti	270591302001	Stearns	271450104031
Isanti	270591303022	Stearns	271450114001
Otter Tail	271119617001	Stearns	271450102003
Otter Tail	271119613001	Stearns	271450104011
Otter Tail	271119615001	Stearns	271450102002
Otter Tail	271119608001	Stearns	271450113041
Otter Tail	271119616001	Stearns	271450112001
Otter Tail	271119614001	Stearns	271450113042
Otter Tail	271119615002	Stearns	271450112004
Otter Tail	271119617002	Stearns	271450113021
Otter Tail	271119608002	Stearns	271450110001
Otter Tail	271119616002	Stearns	271450113012
Otter Tail	271119613004	Stearns	271450111002
Otter Tail	271119613002	Stearns	271450111001
Otter Tail	271119601031	Stearns	271450110003
Otter Tail	271119613003	Stearns	271450111003
Otter Tail	271119608003	Stearns	271450113011
Otter Tail	271119609006	Stearns	271450109001
Otter Tail	271119617003	Stearns	271450113043
Otter Tail	271119601022	Stearns	271450101023
Otter Tail	271119612002	Stearns	271450102001
Otter Tail	271119612001	Stearns	271450112002
Otter Tail	271119601033	Stearns	271450005003
Otter Tail	271119610005	Stearns	271450113014
Martin	270917901001	Stearns	271450113023
Martin	270917904001	Stearns	271450112003
Martin	270917903001	Stearns	271450110002
Martin	270917902002	Stearns	271450101011
Martin	270917902004	Stearns	271450113022
Martin	270917904002	Stearns	271450006013
Martin	270917901003	Stearns	271450101021
Martin	270917902001	Steele	271479605002

Steele	271479605001	Carver	270190907011
Steele	271479608002	Carver	270190904021
Steele	271479601001	Carver	270190912012
Steele	271479601002	Carver	270190904022
Steele	271479601003	Carver	270190910003
Steele	271479605003	Carver	270190910002
Steele	271479608003	Carver	270190907021
Steele	271479602001	Carver	270190903012
Steele	271479608001	Carver	270190906021
Steele	271479608004	Carver	270190905032
Steele	271479602002	Carver	270190908002
Steele	271479604002	Carver	270190909001
Steele	271479604003	Carver	270190907012
Steele	271479603003	Carver	270190908005
Meeker	270935606002	Carver	270190906012
Meeker	270935606001	Carver	270190905011
Meeker	270935606003	Carver	270190905021
Meeker	270935602001	Carver	270190903013
Meeker	270935605003	Carver	270190908003
Meeker	270935601001	Carver	270190905031
Meeker	270935605002	Wright	271711011003
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Meeker	270935602004	Wright	271711008012
Meeker	270935605001	Wright	271711005003
Meeker	270935602002	Wright	271711012003
Meeker	270935601004	Wright	271711013004
Carver	270190911002	Wright	271711012001
Carver	270190912021	Wright	271711007034
Carver	270190902001	Wright	271711013001
Carver	270190902002	Wright	271711007031
Carver	270190901001	Wright	271711005001
Carver	270190903011	Wright	271711011004
Carver	270190903021	Wright	271711010001
Carver	270190912022	Wright	271711002021
Carver	270190911001	Wright	271711009003
Carver	270190912011	Wright	271711011002
Carver	270190904011	Wright	271711003003
Carver	270190901004	Wright	271711007035
Carver	270190904012	Wright	271711001005
Carver	270190901002	Wright	271711008013
Carver	270190910004	Wright	271711009004
Carver	270190906011	Wright	271711004001

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Wright	271711012002	Waseca	271617902001
Wright	271711008024	Waseca	271617903002
Wright	271711002042	Waseca	271617902002
Wright	271711004002	Waseca	271617903001
Wright	271711007032	Waseca	271617903003
Wright	271711004003	Waseca	271617903004
Wright	271711008022	Waseca	271617901002
Wright	271711007033	Waseca	271617905001
Wright	271711007023	Waseca	271617905002
Wright	271711003002	Waseca	271617902003
Wright	271711011001	Waseca	271617904002
Wright	271711010003	Waseca	271617904003
Wright	271711010004	Waseca	271617904001
Wright	271711007022	Mower	270990013001
Wright	271711003001	Mower	270990012001
Wright	271711004004	Mower	270990012002
Wright	271711013003	Mower	270990010001
Wright	271711001003	Mower	270990013002
Lyon	270833601001	Mower	270990014002
Lyon	270833602003	Mower	270990010003
Lyon	270833602001	Mower	270990010002
Lyon	270833601003	Mower	270990013004
Lyon	270833606003	Mower	270990014001
Lyon	270833602002	Mower	270990013003
Lyon	270833605002	Mower	270990001001
Lyon	270833601004	Mower	270990009001
Lyon	270833603003	Mower	270990009002
Lyon	270833601002	Mower	270990004105
Renville	271297904002	Nicollet	271034802002
Renville	271297903002	Nicollet	271034802003
Renville	271297902001	Nicollet	271034802001
Renville	271297904001	Nicollet	271034804001
Renville	271297906001	Nicollet	271034801003
Renville	271297903001	Nicollet	271034801001
Renville	271297905001	Nicollet	271034801002
Renville	271297901001	Nicollet	271034803002
Renville	271297906003	Nicollet	271034804003
Renville	271297906002	Nicollet	271034804002
Renville	271297905002	Nicollet	271034805012
Renville	271297904003	Nicollet	271034803001
Renville	271297905003	Nicollet	271034803003
Renville	271297902002	Rice	271310704002

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Rice	271310702004	Dodge	270399504002
Rice	271310704004	Traverse	271554602001
Rice	271310704001	Traverse	271554601001
Rice	271310702002	Traverse	271554601003
Rice	271310702003	Traverse	271554601002
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Rice	271310702001	Watonwan	271659501001
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Rice	271310704003	Watonwan	271659503002
Rice	271310703002	Watonwan	271659503001
Rice	271310709011	Watonwan	271659501002
Rice	271310708002	Watonwan	271659502002
Rice	271310707002	Watonwan	271659502004
Rice	271310706021	Scott	271390813001
Benton	270090201005	Scott	271390808003
Benton	270090203002	Scott	271390813002
Benton	270090201002	Scott	271390810003
Benton	270090202021	Scott	271390812001
Benton	270090201001	Scott	271390811003
Benton	270090203001	Scott	271390813003
Benton	270090202032	Scott	271390803012
Benton	270090201004	Scott	271390809031
Benton	270090202062	Scott	271390809033
Benton	270090212004	Scott	271390811004
Benton	270090202052	Scott	271390811001
Chippewa	270239505001	Scott	271390808002
Chippewa	270239503001	Scott	271390807001
Chippewa	270239505002	Scott	271390809051
Chippewa	270239504003	Scott	271390803022
Chippewa	270239506003	Scott	271390813004
Chippewa	270239504001	Scott	271390802012
Chippewa	270239506002	Scott	271390803023
Chippewa	270239506001	Scott	271390805001
Dodge	270399503002	Scott	271390802033
Dodge	270399504001	Scott	271390808001
Dodge	270399501001	Scott	271390803013
Dodge	270399502001	Scott	271390807002
Dodge	270399502003	Scott	271390804003
Dodge	270399501002	Scott	271390804001
Dodge	270399503003	Scott	271390803011
Dodge	270399504003	Scott	271390802011
Dodge	270399502002	Houston	270550209003

Houston	270550202003	Cottonwood	270332703002
Houston	270550209001	Cottonwood	270332702002
Houston	270550203002	Olmsted	271090022002
Houston	270550202002	Olmsted	271090019002
Houston	270550209002	Olmsted	271090022001
Houston	270550205001	Olmsted	271090018002
Houston	270550205002	Olmsted	271090020003
Freeborn	270471810002	Olmsted	271090020001
Freeborn	270471801001	Olmsted	271090019005
Freeborn	270471810003	Olmsted	271090009031
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Freeborn	270471801003	Olmsted	271090012032
Freeborn	270471807001	Olmsted	271090016032
Freeborn	270471807002	Olmsted	271090014021
Freeborn	270471810001	Olmsted	271090020005
Freeborn	270471802001	Olmsted	271090022003
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Freeborn	270471803002	Olmsted	271090021004
Freeborn	270471803001	Olmsted	271090020002
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Fillmore	270459604004	Washington	271630702053
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Fillmore	270459604003	Washington	271630702063
Fillmore	270459601001	Washington	271630714003
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Fillmore	270459603003	Washington	271630710033
Fillmore	270459603002	Washington	271630707042
Fillmore	270459602001	Washington	271630707011
Fillmore	270459604001	Washington	271630711023
Fillmore	270459602002	Washington	271630702032
Cottonwood	270332701001	Washington	271630704031
Cottonwood	270332703001	Washington	271630712061
Cottonwood	270332704001	Washington	271630713002
Cottonwood	270332701002	Washington	271630711011
Cottonwood	270332702001	Washington	271630704041
Cottonwood	270332702003	Washington	271630712072
Cottonwood	270332703003	Washington	271630710062
Cottonwood	270332701003	Washington	271630710032

Washington	271630709072	Washington	271630707041
Washington	271630711021	Washington	271630701061
Washington	271630714002	Washington	271630704051
Washington	271630710153	Washington	271630712082
Washington	271630705012	Washington	271630707013
Washington	271630709102	Washington	271630710151
Washington	271630711022	Washington	271630705011
Washington	271630704052	Washington	271630710103
Washington	271630704033	Washington	271630703032
Washington	271630710122	Washington	271630710102
Washington	271630702041	Washington	271630704063
Washington	271630707032	Washington	271630710182
Washington	271630709062	Washington	271630712073
Washington	271630707012	Washington	271630705024
Washington	271630714004	Washington	271630712063
Washington	271630711013	Washington	271630704061
Washington	271630704042	Washington	271630709122
Washington	271630703012	Washington	271630709063
Washington	271630703043	Washington	271630709061
Washington	271630710161	Washington	271630710031
Washington	271630706023	Clay	270270301071
Washington	271630706021	Clay	270270301041
Washington	271630704034	Clay	270270301072
Washington	271630707031	Clay	270270301042
Washington	271630710012	Clay	270270301044
Washington	271630702042	Clay	270270302023
Washington	271630710132	Clay	270270302012
Washington	271630704032	Clay	270270302011
Washington	271630703033	Clay	270270301023
Washington	271630710061	McLeod	270859501004
Washington	271630710171	McLeod	270859501002
Washington	271630706022	McLeod	270859506002
Washington	271630705021	McLeod	270859506003
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Washington	271630714001	McLeod	270859507002
Washington	271630712062	McLeod	270859507003
Washington	271630703011	McLeod	270859507004
Washington	271630703041	McLeod	270859507001

Redwood	271277506001	Becker	270054502001
Redwood	271277504002	Becker	270054504001
Redwood	271277501002	Becker	270054507001
Redwood	271277505001	Becker	270059400003
Redwood	271277506002	Becker	270054507002
Redwood	271277502001	Becker	270054503002
Redwood	271277502002	Becker	270059400002
Redwood	271277503002	Becker	270054504002
Redwood	271277503001	Becker	270054508001
Pope	271219703003	Becker	270054505002
Pope	271219703002	Becker	270054506001
Pope	271219702003	Brown	270159607003
Pope	271219701003	Brown	270159606001
Pope	271219704001	Brown	270159607002
Sibley	271431701981	Brown	270159607004
Sibley	271431702003	Brown	270159607001
Sibley	271431704003	Wabasha	271574905002
Sibley	271431703001	Wabasha	271574902003
Sibley	271431702001	Wabasha	271574905003
Sibley	271431701983	Wabasha	271574905001
Sibley	271431702004	Wabasha	271574904001
Sibley	271431704002	Wabasha	271574902001
Sibley	271431701982	Wabasha	271574902002
Sibley	271431704004	Wabasha	271574904002
Sherburne	271410303004	Wabasha	271574904004
Sherburne	271410303001	Wabasha	271574901002
Sherburne	271410303002	Marshall	270890804001
Sherburne	271410301012	Marshall	270890803001
Sherburne	271410305022	Marshall	270890801002
Sherburne	271410304025	Wilkin	271679501004
Sherburne	271410304031	Wilkin	271679501003
Sherburne	271410301021	Wilkin	271679501001
Sherburne	271410315001	Winona	271696708002
Sherburne	271410304032	Winona	271696710002
Sherburne	271410301011	Winona	271696701001
Sherburne	271410315004	Winona	271696709002
Sherburne	271410305033	Winona	271696701002
Sherburne	271410305042	Winona	271696706003
Jackson	270634803001	Winona	271696708001
Jackson	270634804002	Winona	271696710001
Jackson	270634802001	Winona	271696701003
Becker	270054503001	Winona	271696708003
Becker	270054502002	Big Stone	270119502001

Big Stone	270119501001
Faribault	270434602001
Faribault	270434601002
Faribault	270434605003
Faribault	270434606001
Wadena	271594802001
Wadena	271594802003
Polk	271190202002
Polk	271190202001
Lincoln	270812010022

Exhibit 3
Consolidated Census Blocks