



April 23, 2021  
Via Electronic Filing

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

**Re: Docket No. P558/M-21-132 Red River Rural Telephone Association dba Red River Communications  
Petition for Designation as an Eligible Telecommunications Carrier**

Dear Mr. Seuffert:

On February 17, 2021, Red River Rural Telephone Association dba Red River Communications (Red River) filed with the Minnesota Public Utilities Commission (PUC) a Petition for Expanded Designation as an Eligible Telecommunications Carrier pursuant to Red River’s participation, and subsequent award, in the FCC’s Rural Digital Opportunity Fund Auction. Red River hereby submits this response to the Notice of Request for Additional Information.

Red River provides the following responses to the Additional Information Requested from ETC Petitioners in the format requested by the PUC:

ETC Applicant Name: <b>Red River Rural Telephone Association dba Red River Communications</b>	Yes (Certify)/No	Additional Information (Attach additional pages as necessary)
MPUC Docket Number: <b>P558/M-21-132</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	Red River certifies that it will meet the service and performance requirements applicable to RDOF and Lifeline support.
2. Will the applicant offer standalone voice telephony service? 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	Yes	Red River certifies it will offer standalone voice service in the designated service area. Red River will offer voice service as interconnected Voice over Internet Protocol (“VoIP”) service. Red River currently provides VoIP service to 27 customers throughout Minnesota. Proof of this offering can be found on Red River’s website here: <a href="https://redrivercomm.com/phone/">https://redrivercomm.com/phone/</a> . Red River intends to offer the same VoIP voice service as a

<p>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).</p>		<p>standalone voice offering throughout the requested designated service area.</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)(1).</p>	<p>Yes</p>	<p>Red River will use primarily its own facilities, but at times may resell another carrier's services.</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>Red River certifies the following contact person is legally authorized to represent Red River in communications with Minnesota customers:  Tom Steinolfson  General Manager/CEO  510 Broadway  Abercrombie, ND 58001  (701) 553-8309</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>Red River certifies its VoIP voice service will provide access to 911/E-911 consistent with MN requirements.</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</p>	<p>Yes</p>	<p>Red River has a reasonable amount of back-up power to ensure functionality. Red River's specific back-up power sources are lead calcium batteries, gel cell batteries, fixed AC and DC natural/LP gas</p>

<p>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>generators, fixed AC and DC gasoline/diesel generators and portable LP/gasoline generators. Each existing node or central office has or will contain a reserve battery supply of 4 hours or more where fixed emergency power generators are not installed and at least 8 hours or more where they are in place. Red River has a fiber optic protected ring as its backbone to each exchange area served and can reroute traffic around damaged facilities. It also has extensive capacity that is capable of managing traffic spikes resulting from emergency situations. If there is a failure of Red River’s main route, voice traffic is automatically rerouted to a redundant backup route.</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>Red River certifies the pricing of its voice service will be reasonably comparable to the price of similar services in urban areas pursuant to FCC requirements. Red River offers VoIP phone service for \$30-\$35 per month.</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>Red River certifies that it will comply with the additional requirements applicable to all high-cost ETCs under FCC rules. Red River will make Lifeline service available to qualifying low-income consumers and publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.</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> <ul style="list-style-type: none"> <li>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.</li> <li>b. Future Lifeline providers should provide planned</li> </ul>	<p>Yes</p>	<p>Red River will advertise via newspapers, bill inserts, newsletter, and its website. Red River currently serves 5 Lifeline customers in Minnesota. Red River communicates its Lifeline offering on its website at <a href="https://redrivercomm.com/phone/lifeline/">https://redrivercomm.com/phone/lifeline/</a> and a copy of its newsletter notice/advertisement previously sent to all customers is attached herein as Exhibit 1.</p>

communications as described in 47 CFR §54.405(c).		
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.		Red River offers its own Interconnected VoIP service, where it has the customer relationship, bills for the services and handles all customer service issues.
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 CFR 54.320(d).	Yes	Red River certifies that it will notify the Minnesota PUC, the Minnesota Department of Commerce, and the Minnesota Office of Attorney General if it fails to meet its milestones for its buildout obligations under its RDOF grants for Minnesota.

Please contact the undersigned if any further information is needed.

Sincerely,

*Mikaela Burma*

Mikaela Burma  
Manager of Regulatory and Legal  
Vantage Point Solutions  
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Mikaela.Burma@Vantagepnt.com

Enclosure(s)

cc: Thomas Steinolfson, CEO, Red River Rural Telephone Association, dba Red River Communications

**Exhibit 1**

**Red River Rural Telephone Association, dba Red River Communications  
Lifeline Newsletter Notice/Advertisement**

# ASSISTANCE PAYING FOR YOUR PHONE AND BROADBAND INTERNET SERVICES

Lifeline is a federal assistance program funded by the Universal Service Fund which provides a discount towards telephone or broadband service for qualified low-income customers. The Lifeline program currently offers a credit of \$5.25/month for telephone service and \$9.25/month for broadband service per eligible household.

These monthly credits will change Dec. 1, 2021 to \$9.25 for broadband service and no telephone discount. Only one Lifeline discount per household is allowed nationwide. Federal eligibility is verified annually.

To qualify for Lifeline you must have a household income that is at or below 135% of the Federal Poverty Guidelines, or participate in one of the following assistance programs:

**Federal Public Housing Assistance (FPHA) / Section 8  
Supplemental Nutrition Assistance Program (SNAP)  
Veteran Pension & Survivor Pension Benefit  
Supplemental Security Income (SSI)  
Medicaid**

## TO APPLY FOR DISCOUNTS IN MN, ND & SD

The FCC National Lifeline Verifier determines an applicant's Lifeline eligibility. To apply for Lifeline, visit **[www.CheckLifeline.org](http://www.CheckLifeline.org)**, select your state in the drop down menu, enter your personal information, and after the FCC National Eligibility Verifier approves your application, contact our business office to activate your Lifeline benefits.

MN residents who qualify for the federal Lifeline for telephone service also automatically qualify for a \$7.00/month state Telephone Assistance Program (TAP) discount on landline telephone service. TAP discount will increase to \$10.00/month effective April 1, 2021.

The telephone service must be in the applicant's name in order to qualify based either on household income or the above listed assistance programs. Contact our business office for assistance with MN TAP.

**IF QUALIFYING BASED ON HOUSEHOLD INCOME,  
SEE THE FEDERAL POVERTY GUIDELINES AT  
[HTTPS://ASPE.HHS.GOV](https://aspe.hhs.gov)**

### LIFELINE PROGRAM

FCC  
445 12th ST SW  
Washington, DC 20554

1-888-225-5322 voice  
1-888-835-5322 TTY

**[www.lifelinesupport.org](http://www.lifelinesupport.org)**

### MN TELEPHONE ASSISTANCE PROGRAM

For more information, visit the MN Public Utility Commission's website at

**[https://mn.gov/puc/telecommunications/  
telephone-discounts](https://mn.gov/puc/telecommunications/telephone-discounts)**