

HERMAN & WHITEAKER, LLC

DONALD L. HERMAN, JR  
GREGORY W. WHITEAKER  
CLARE L. ANDONOV  
ROBIN E. TUTTLE<sup>†</sup>  
CARRIE L. DEVIER<sup>††</sup>  
HILARY F. ROSENTHAL  
<sup>†</sup> Admitted in DC, SC and FL only  
<sup>††</sup> Admitted in SC only  
  
TEL 202-600-7272  
FAX 202-706-6056  
6720 B Rockledge Drive, Suite 150  
Bethesda, MD 20817

**Via eFiling**

March 26, 2021

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place E. Suite 350  
St. Paul, MN 55101-2147

**RE: Notice to Rural Digital Opportunity Fund (RDOF) 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:

Attached are the Comments of Paul Bunyan Rural Telephone Cooperative (“PBRTC”) on the Petition for Expansion as an Eligible Telecommunications Carrier, filed by LTD Broadband LLC (“LTD”) on February 17, 2021, for expansion of LTD’s Eligible Telecommunications Carrier (“ETC”) designation in connection with LTD’s winning bids in the Federal Communications Commission (“FCC”) Rural Digital Opportunity Fund (“RDOF”) Auction 904.

Respectfully submitted,



Gregory W. Whiteaker  
*Counsel for Paul Bunyan  
Rural Telephone Cooperative*

Attachment

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION  
SUITE 350  
121 SEVENTH PLACE EAST  
SAINT PAUL, MINNESOTA 55101-2147**

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

In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners      Docket No: P999/CI-21-86

In the Matter of Petition of LTD Broadband LLC to Expand its Designation as an Eligible Telecommunications Carrier      Docket No: P6995/M-21-133

**COMMENTS OF PAUL BUNYAN RURAL TELEPHONE COOPERATIVE  
REGARDING**

**LTD BROADBAND LLC PETITION FOR EXPANSION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER**

Paul Bunyan Rural Telephone Cooperative (“PBRTC”), by its counsel and pursuant to the Notice of Filing Requirement and Comment Deadlines for RDOF Grant Winners issued February 2, 2021 (“Notice”), hereby comments on the request of LTD Broadband LLC (“LTD”) for expansion of its Eligible Telecommunications Carrier (“ETC”) designation for nine hundred fifty (950) census block groups (“CBGs”) in Minnesota awarded to LTD in the Federal Communications Commission (“FCC”) Rural Digital Opportunity Fund (“RDOF”) Auction 904.<sup>1</sup> In the Notice, the Minnesota Public Utilities Commission (the “Commission”) seeks comment on whether the Commission should approve the ETC designations or expansions of the

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<sup>1</sup> See Petition for Expansion as an Eligible Telecommunications Carrier, filed February 17, 2021 (“Petition”).

filing carriers for the purpose of applying RDOF in Minnesota, and whether the Commission should take any other actions.<sup>2</sup>

For the reasons set-forth herein, the Commission should deny expansion of LTD's designation. The Petition fails to demonstrate that LTD satisfies the requirements for expansion of its ETC designation, and LTD's track record raises serious concerns about LTD's ability and commitment to provide the required services in Minnesota. If the Commission determines otherwise, however, then at a minimum, the Commission should impose conditions on LTD to ensure the protection of consumers in Minnesota, including low-income consumers, and the integrity of the Universal Service Fund ("USF") High Cost and Low-Income Programs.

## **I. BACKGROUND AND LEGAL STANDARD**

### **A. FCC RDOF Auction 904**

Despite being a very small company, with a single owner, and with no (or very limited) experience in deploying fiber, LTD was the low bidder and largest winning bidder in Auction 904 for approximately \$1.32 billion in RDOF support, including \$311.9 million for the state of Minnesota.<sup>3</sup> The Auction 904 results require LTD to provide voice and broadband services at 1Gbps/500Mbps speeds with 2 TB monthly usage and roundtrip latency at or below 100 milliseconds to 528,088 locations in fifteen (15) states, including over 100,000 rural locations in Minnesota, all within six (6) years.<sup>4</sup> In Minnesota, LTD states that it "will provide broadband and voice over IP services over RDOF funded and installed fiber-optic facilities to customer

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<sup>2</sup> By a Notice of Extended Comment Period issued March 2, 2021, the Commission extended the deadline for filing initial comments to March 26, 2021.

<sup>3</sup> See *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced*, Public Notice DA 20-1422 (2020) ("*Winning Bidder PN*").

<sup>4</sup> See *id.* See also, *417 Long-Form Applicants in the Rural Digital Opportunity Fund Phase I Auction (Auction 904)*, Public Notice DA 21-170 (rel. Feb. 18, 2021). Recipients of RDOF support must deploy the required service to 40% of the unserved locations by year three of the program, 60% by year four, 80% by year five, and 100% by year six. See 47 C.F.R. § 54.802.

premises.”<sup>5</sup> LTD currently claims to offer Internet access service using fixed wireless technology in five states: Iowa, Minnesota, Nebraska, South Dakota, and Wisconsin. LTD’s service area is limited, however, and the speeds which LTD currently claims to offer fall well below the speeds that LTD will be required to provide in order to satisfy its RDOF obligations.<sup>6</sup>

LTD also was a winning bidder in the CAF II Auction (Auction 903) for 840 CBGs in Minnesota.<sup>7</sup> In connection with that auction, the Commission designated LTD as an ETC in certain areas in order to receive CAF II support.<sup>8</sup> With the Petition, LTD seeks expansion of its ETC designation in Minnesota in order to be eligible to receive RDOF support in Minnesota.

PBRTC also participated in, and was the winning bidder for certain CBGs in Auction 904,<sup>9</sup> and also has sought expansion of its ETC designation in Minnesota. PBRTC has extensive experience in deploying fiber and providing broadband services to rural areas. PBRTC bid against LTD in Auction 904, but PBRTC’s interest in filing these comments is in trying to ensure that rural communities are adequately served and to prevent the harm that will result to rural areas in Minnesota if LTD defaults.

## **B. ETC Requirements**

Pursuant to Section 214(e) of the Communications Act of 1934, as amended (the “Act”), the Commission may designate a *common carrier* as an ETC for a service area designated by the Commission where the carrier: (1) offers the services that are supported by federal USF mechanisms, and (2) advertises the availability of such services and the charges for such services

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<sup>5</sup> *Petition* at p. 4.

<sup>6</sup> See <https://ltdbroadband.com/plans>, visited March 24, 2021.

<sup>7</sup> See *Connect America Fund Phase II Auction (Auction 903) Closes, Winning Bidders Announced*, Public Notice DA 18-887 (rel. Aug. 28, 2018).

<sup>8</sup> See *Order Approving Request for ETC Status for High Cost Support in Certain Census Blocks* in Dockets P-6995/M-18-653 and P-999/CI-18-634, issued Feb. 8, 2019, *subsequent history omitted* (“LTD CAF II ETC Order”).

<sup>9</sup> See *Winning Bidder PN*.

using media of general distribution.<sup>10</sup> As the Commission recently summarized, in seeking ETC designation or modification, an applicant also must:

- Certify that it will comply with the service requirements applicable to the support it receives;
- Demonstrate its ability to remain functional in emergency situations;
- Demonstrate that it will satisfy applicable consumer-protection and service-quality standards;
- Demonstrate financial and technical ability to provide Lifeline service;
- Provide a description of its Lifeline service offering; and
- Demonstrate that its ETC designation is in the public interest.<sup>11</sup>

Moreover, as continuing oversight of carriers that the Commission designates as ETCs, the Commission also must find that such carriers demonstrate that the carriers have used, and will continue to use, federal high-cost subsidies only to provide, maintain, and upgrade the facilities and services for which the support is intended.<sup>12</sup>

## II. ARGUMENT

### A. LTD Fails to Demonstrate that It Will Satisfy the Obligations of an ETC in Minnesota and that Expansion of LTD's Designation is in the Public Interest.

LTD fails to demonstrate that it will satisfy the obligations of an ETC in Minnesota and that expansion of LTD's designation is in the public interest.<sup>13</sup> It is highly questionable that

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<sup>10</sup> See 47 U.S.C. § 214(e)(1) & (2). LTD is neither a common carrier nor a certificated carrier in Minnesota and therefore lacks the basic qualification to be an ETC for federal USF support. Although the FCC has determined that a managed VoIP platform may be used to provide voice grade access to the public switched telephone network, the FCC has not eliminated the requirement that an ETC hold itself out as a common carrier to the public. The Commission appears to have disagreed with this position in its *LTD CAF II ETC Order*, see p. 4. PBRTC respectfully requests that the Commission revisit this question in connection with the RDOF ETC expansion request.

<sup>11</sup> See in the *Matter of a Notice to Connect America Fund II Grant Winners, et al., Order Approving Requests for ETC Status for High Cost Support in Certain Census Blocks* in Docket No. P-999/CI-18-634, et al., at pp.7-8 (Feb. 14, 2019), citing 47 C.F.R. § 54.202 (a), (b). See also, 47 C.F.R. § 54.201(d) and Minn. Admn. Rule 7811.1400 subpart 2 (“before designating an additional eligible telecommunications carrier, the commission shall find the designation is in the public interest.”).

<sup>12</sup> See 47 C.F.R. § 54.314.

<sup>13</sup> See Minn. Admn. Rule 7811.1400.

LTD has the capability to provide the supported services at the speeds and latency required within the time required. This likely will result in years of delay in the deployment of broadband services to these areas and misuse of funds that could have gone to another provider. Even assuming that LTD does provide some services, LTD fails to demonstrate that it will comply with consumer protection requirements or offer service to low-income consumers consistent with the Lifeline program requirements.

**B. LTD Fails to Demonstrate that It Possesses the Necessary Skills, Capabilities, and Resources to Timely Provide the Services in Minnesota.**

As a threshold matter, there is no credible basis for determining that LTD possesses the technical, financial, managerial, operational skills, capabilities, and resources to deliver the gigabit fiber services in Minnesota, much less in the fourteen (14) other states, ten (10) of which LTD currently has no current operations or facilities. LTD faces a herculean task of deploying fiber to 528,088 locations in 92,092 eligible census blocks in the fifteen (15) states in a compressed time period in order to satisfy its RDOF performance requirements, on top of its CAF II performance obligations.

LTD is a very small provider with limited resources. As recently as February 25, 2019, LTC sought a waiver and extension of time to submit basic financial information to the FCC in connection with Auction 903 because LTD argued, and the FCC found:

[LTD] is a small business with a limited number of employees and administrative resources. LTD Broadband argues that, although it has done everything under its control to submit timely information to demonstrate its technical and financial capabilities, its attempts to retain and engage accountants within the required time frame were unsuccessful.<sup>14</sup>

If LTD cannot timely hire an accountant to prepare financial statements (when LTD knew for over two years that it would be required to produce such statements), how can the Commission

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<sup>14</sup> See *Connect America Fund et al.* Order DA 19-763 (rel. Aug. 9, 2019) at ¶ 6 (“*LTD CAF II Waiver Order*”).

hope that LTD will timely deploy fiber in rural Minnesota and provide critical services such as providing service to low-income consumers. PBRTC has seen no indication that LTD is attempting to hire and increase staff in anticipation of actually meeting its RDOF obligations.

Indeed, LTD's history with federal USF programs is one of defaults, missed deadlines, and compliance issues. For example, the CAF II auction assigned LTD support for 108 CBGs in Nebraska and Nevada.<sup>15</sup> In February 2019, however, LTD notified the FCC that LTD did not intend to pursue certain winning bids in Nebraska and Nevada, defaulting on \$71,254 of the CAF II support.<sup>16</sup> In response, the FCC issued the *LTD CAF II NAL* with a monetary penalty and found that LTD had "hindered the disbursement of funds that could have otherwise been productively used to increase broadband access to unserved or underserved areas."<sup>17</sup> The FCC stated:

By becoming a successful bidder and later choosing not to proceed with its service plans and the obligations it undertook for Auction 903, the Company hindered the disbursement of funds that could have gone to another provider, and thereby further delayed the advancements in broadband offerings in the CBGs where it defaulted on its winning bids. Furthermore, defaulting on bids imposes a cost to the CAF-II in administrative time spent on reviewing the bids and awarding the support. Likewise, default negatively impacts the residents of the corresponding CBGs in lost opportunities and delays in launching affordable services.<sup>18</sup>

Similarly, in 2014, LTD was a provisional winner of Rural Broadband Experiment ("RBE") support for \$20,000,000 in Iowa and Minnesota.<sup>19</sup> LTD requested a thirty-day extension of time to file its letter of credit commitment letter for the RBE funding, noting that it

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<sup>15</sup> See *LTD Broadband LLC Applicant for Phase II Connect America Fund*, Notice of Apparent Liability for Forfeiture, DA 19-950, 34 FCC Rcd. 9973, 9975 ¶ 7 (2019) ("*LTD CAF II NAL*").

<sup>16</sup> See *id.*

<sup>17</sup> See *id.* at ¶ 12.

<sup>18</sup> *Id.*

<sup>19</sup> See *Wireline Competition Bureau Announces Entities Provisionally Selected for Rural Broadband Experiments; Sets Deadlines for Submission of Additional Information*, WC Docket No. 10-90, 29 FCC Rcd. 14684 (2014).

needed the additional time because two banks thus far would not issue it the requisite letter of credit.<sup>20</sup> The FCC denied LTD's request for an extension of time, and LTD apparently did not receive the RBE support.<sup>21</sup> As noted above, LTD also failed to timely submit audited financial statements with its CAF II long-form application and sought a waiver and extension of time.<sup>22</sup> LTD has shown time and time again that it is unreliable, unaccountable, and financially questionable.

LTD has been accepting CAF II support, and certifying that it has used the support to provide the supported services,<sup>23</sup> but it is not clear that LTD offers *any* voice services at all at this time, much less Lifeline service. There is no information regarding LTD's voice plans on its Website, and yet in the Petition, LTD states, "LTD's voice telephony plans include local, intrastate interexchange, and interstate long distance all inclusive."<sup>24</sup> Prior to expanding LTD's ETC designation, the Commission should carefully investigate LTD's candor and progress toward, and compliance with its CAF II deployment and service obligations in Minnesota thus far. The Commission also may want to evaluate whether LTD continues to qualify as an ETC in the CAF II-supported areas.

In addition, based on PBRTC's extensive experience in deploying fiber in rural northern Minnesota, the RDOF support that LTD will receive is a small fraction of the money that will be required to deploy a fiber network in LTD's RDOF support area. LTD claims that it "is

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<sup>20</sup> See Request for Extension of Time to File LOC Commitment Letter of LTD Broadband LLC, WC Docket Nos. 10-90, 14-259, 14-58 (filed Feb. 3, 2015) ("LTD Petition") at p. 3.

<sup>21</sup> See *Connect America Fund; Rural Broadband Experiments*, Order, DA 15-698, 30 FCC Rcd. 6257 (rel. June 15, 2015) (refusal of financial institution to issue letter of credit was not "unique and unavoidable").

<sup>22</sup> See *LTD CAF II Waiver Order*, DA 19-763 (this despite knowing for at least two years that LTD would be required to submit audited financial statements).

<sup>23</sup> See, e.g., *Annual Certification Related to Eligible Telecommunications Carriers' Use of the Federal Universal Service Support Reporting Requirements – Form 481*, Affidavit of Corey Hauer (Filed July 1, 2020).

<sup>24</sup> Petition at p. 7.



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.*”<sup>25</sup> The FCC, however, requires “support recipients to offer the required voice and broadband service to all eligible homes and small businesses within the awarded areas...”<sup>26</sup> This is the entire point of awarding support in a reverse auction at the census block level, the recipient must serve *all locations*. Bidders should have calculated the cost of providing service to *all locations* within the bid area, not just those to which service could be provided “at a reasonable cost.”

Moreover, LTD has sought ETC designation for its winning CBGs and if designated as an ETC in those areas, must offer the services throughout the entirety of the designated CBG service area. Not all census blocks within the winning CBGs are eligible for RDOF support, however. The RDOF support may only be used to provide service in the *eligible* census blocks within the CBGs. PBRTC suggests that LTD has *vastly underestimated* the cost of deploying the network and satisfying LTD’s RDOF performance obligations, and that LTD is exceeding likely to default on such obligations.

LTD will no doubt respond that it is the FCC’s job (not the Commission’s) to review LTD’s qualifications for RDOF support and to determine whether or not LTD possesses the technical and financial ability to satisfy LTD’s performance obligations. It is true that the FCC is reviewing LTD’s long-form application for this purpose. But the Commission should not abdicate its authority and responsibility to ensure that LTD has demonstrated that it qualifies as an ETC in the RDOF areas and that expanding LTD’s ETC designation is in the public interest. This is especially critical with respect to consumer protection and the support of communications

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<sup>25</sup> Petition at p. 7 (emphasis added).

<sup>26</sup> *Rural Digital Opportunity Fund*, Report and Order, FCC 20-5, at ¶ 6 (rel. Feb. 7, 2020).

services to low-income consumers, areas clearly within the Commission’s authority and expertise.

**C. LTD Fails to Demonstrate that it Will Protect Consumers.**

The Petition fails to demonstrate that LTD will protect consumers and meet service quality standards. In the Petition, LTD asserts that it will “satisfy all consumer protection and service quality standards as provided in 47 C.F.R. § 54.202(a)(3).”<sup>27</sup> That section of the FCC’s rules, however, contains no consumer protection or service-quality standards (other than a reference to commercial mobile wireless standards). As the Minnesota Department of Commerce (“DOC”) previously warned, as a non-certificated, information service provider, LTD apparently *is not subject to any* Minnesota consumer protection provisions intended to protect consumers of communications services.<sup>28</sup> The DOC explained,

Because LTD and Broadband have not sought or received certificates of authority in Minnesota, there is no existing set of state rules applicable to their services that the Commission can enforce. That is, LTD and Broadband at present need offer none of the consumer protections of Minnesota statutes or the Commission’s rules, except to the extent compliance with a set of rules is required in this proceeding.<sup>29</sup>

LTD’s statements in the Petition regarding consumer protection are hollow and unenforceable.

Indeed, the DOC’s concerns are materializing with LTD’s track record. The Better Business Bureau (“BBB”) gives LTD’s Minnesota operations a failing “F” rating, and indicates

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<sup>27</sup> Petition at p.9.

<sup>28</sup> *See in the Matter of LTD Broadband LLC’s Petition for Eligible Telecommunications Carrier Designation in Minnesota*, Docket No: P-6995/M-18-653, *et al.*, Comments of the Minnesota Department of Commerce at p. 7 (filed Dec. 12, 2018) (“To the extent that LTD does not offer a telecommunications service, there is no service for which a certificate of authority is required; and the consumer protections provided for in the statutes and Commission’s rules will not apply.”), and Minnesota Department of Commerce Request for Reconsideration (filed Feb. 19, 2019) (“DOC Request for Reconsideration”).

<sup>29</sup> DOC Request for Reconsideration at p. 5.

that LTD is “not BBB accredited.”<sup>30</sup> The reasons for LTD’s “F” rating are: (1) Failure to respond to 1 complaint filed against business; (2) 14 complaints filed against business; and (3) Length of time business has been operating. BBB customer ratings give LTD a 1.11-star rating on a 5-star scale. The BBB has received fourteen (14) customer complaints against LTD during the last three years, and nine (9) customer complaints against it during the last twelve months. In considering LTD’s expansion request, the Commission also should take notice of its own records regarding consumer complaints against LTD.

LTD’s Website does not contain even the most basic required consumer information such as the FCC-mandated Internet Transparency Statement regarding LTD’s “network management practices, performance characteristics, and commercial terms of its broadband internet access services.”<sup>31</sup> With such lack of information and apparent non-compliance, there is no indication that LTD will protect consumers or meet service level commitments.

Accordingly, the Commission should deny expansion of LTD’s ETC designation. If the Commission determines otherwise, however, then the Commission should at a minimum, condition any expansion of LTD’s ETC designation on LTD’s commitment to specific and enforceable consumer protection and service-level standards.

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<sup>30</sup> See <https://www.bbb.org/us/mn/albert-lea/profile/internet-service/ltd-broadband-0704-1000030372/details> (visited March 25, 2021).

<sup>31</sup> 47 C.F.R. § 8.1(a), which provides:

Any person providing broadband internet access service shall publicly disclose accurate information regarding the network management practices, performance characteristics, and commercial terms of its broadband internet access services sufficient to enable consumers to make informed choices regarding the purchase and use of such services and entrepreneurs and other small businesses to develop, market, and maintain internet offerings.

#### **D. LTD Fails to Demonstrate that it Will Comply with Lifeline Program Requirements.**

LTD also fails to demonstrate that it will comply with applicable Lifeline requirements for the provision of telecommunications services to low-income consumers. Notably, the Petition fails to demonstrate that LTD has the financial and technical ability to provide Lifeline service and provides no description of LTD's Lifeline service offering. The Petition summarily states: "LTD Lifeline terms and conditions address customer eligibility provisions and the availability of subsidies under the Lifeline program and the Minnesota Telephone Assistance Plan."<sup>32</sup> PBRTC, however, has been unable to locate any information regarding LTD's Lifeline offering, terms or conditions, or any information regarding TAP on LTD's Website or any readily available public information. It appears that LTD has no Lifeline offering.

During an investigation regarding compliance with Lifeline obligations, the DOC found:

LTD Broadband [and two other providers], all winners of the 903 auctions of 2017, have no information on their websites concerning Lifeline services. Each of these companies, as recipients of federal funds has an obligation to provide information on Lifeline services. In addition to being awarded over \$1 million in the 903 auction, LTD Broadband was the largest recipient of Rural Digital Opportunity Fund (RDOF) funds in the recent Auction 904. For Minnesota alone, LTD Broadband received over \$300 million to serve more than 100,000 locations. The Department urges the Commission to take note of the large number of customers that will be in LTD Broadband's service area and require that LTD Broadband ensure that low income residents are aware of the opportunity to receive a discount on their service through information on the company's website, at minimum.<sup>33</sup>

LTD did not even trouble itself to respond to the Commission's Notice in this docket, and apparently has taken no action to comply, evidencing an apparent disregard for the Lifeline and low-income program requirements.<sup>34</sup> PBRTC urges the Commission not to further expand

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<sup>32</sup> Petition at p. 7.

<sup>33</sup> *In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High Cost ETCs*, Docket No. P999/CI-20-747, Comments of the Minnesota Department of Commerce at p. 9 (footnotes omitted) ("DOC Lifeline Advertising Comments").

<sup>34</sup> See DOC Lifeline Advertising Comments at note 10.

LTD's designation to the detriment of low-income consumers, and to re-evaluate LTD's eligibility for its existing ETC designation.

### III. CONCLUSION

As explained above, LTD lacks the technical, financial, managerial, operational skills, capabilities, and resources to deliver the required gigabit fiber services in Minnesota. LTD has a history of default, delay and non-compliance with USF programs, and likely will default on its RDOF performance obligations as well. It is particularly problematic that LTD has failed to demonstrate that it will protect consumers or that it will offer services to low-income consumers consistent with the Lifeline program requirements. In general, LTD has failed to demonstrate that expansion of its ETC designation in Minnesota will serve the public interest. Accordingly, the Commission should deny the request. If the Commission, however, decides to expand LTD's designation, such expansion should be conditioned on LTD's compliance with specific and enforceable consumer protection and service quality standards, and the provision of service to low-income consumers.

Respectfully submitted,



Gregory W. Whiteaker  
Robin E. Tuttle  
Herman & Whiteaker, LLC  
6720-B Rockledge Drive, Suite 150  
Bethesda, MD 20817  
*Counsel for Paul Bunyan Rural Telephone  
Cooperative*

March 26, 2021

**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

The undersigned, Hilary Hoyle, hereby certifies that she is employed by the law firm of Herman & Whiteaker, LLC as attorneys for Paul Bunyan Rural Telephone Cooperative and that she has served the attached filing electronically on the attached service lists via the Minnesota Public Utilities Commission's eFiling System on March 26, 2021.



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Hilary Hoyle

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd  Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-86_Official
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.	P.O. Box 920 312 Fourth Street Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-86_Official
Patrick	Caron	Patrick.Caron@cableone.biz	Cable One, Inc.	210 E Earll Dr  Phoenix, AZ 85012	Electronic Service	No	OFF_SL_21-86_Official
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-86_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-86_Official
Joshua	Guyan	jguyan@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400  Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
Kara	Hartman	kara.hartman@aspirenetworks.com	Aspire Networks 2, LLC	PO Box 349  Buford, GA 30515	Electronic Service	No	OFF_SL_21-86_Official
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064  Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-86_Official
Chris M.	Laughlin	claughlin@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400  Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
Phillip R.	Marchesiello	pmarchesiello@wbklaw.com	Wilkinson Barker Knauer, LLP	1800 M Street NW Suite 800N Washington, D.C. 20036	Electronic Service	No	OFF_SL_21-86_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
R. Edward	Price	Ted.Price@spacex.com	Space Exploration Technologies Corp.	1155 F Street NW Ste 475 Washington, DC 20004	Electronic Service	No	OFF_SL_21-86_Official
Eric	Pyland	epyland@team.nxlink.com	AMG Technology Investment Group, LLC	d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087	Electronic Service	No	OFF_SL_21-86_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-86_Official
Jennifer	Richter	jr Richter@akingump.com	Akin Gump Strauss Hauer & Feld LLP	2001 K St. NW Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-86_Official
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-86_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-133_M-21-133
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064  Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-133_M-21-133
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300  Washington, DC 20006	Electronic Service	No	OFF_SL_21-133_M-21-133
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-133_M-21-133