

April 12, 2021

**Via Electronic Filing**

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place E, Suite 350  
Saint Paul, MN 55101

**Re: Docket No. P-999/CI-21-86  
Docket No. P-7055/M-21-161**

Dear Mr. Seuffert:

Cable One VoIP LLC d/b/a Sparklight (the “Company”) respectfully submits this letter in response to the comments filed by the Minnesota Department of Commerce (the “Department”)<sup>1</sup> and the Minnesota Office of the Attorney General – Residential Utilities Division (“OAG”)<sup>2</sup> in the above-referenced dockets.<sup>3</sup> Both the Department and the OAG recommend the Minnesota Public Utilities Commission (“Commission”) approve the Company’s Application for Designation as an Eligible Telecommunications Carrier in Minnesota (the “Application”).<sup>4</sup> As stated in the Application, the Company seeks eligible telecommunications carrier (“ETC”) designation from the Commission to receive (1) Rural Digital Opportunity Fund (“RDOF”) support for the provision of voice and broadband services in certain Census Block Groups and (2) federal Lifeline-only support in other geographic areas of Minnesota. The Company submits this response to correct two factual errors in the record.

First, the Department indicated that it contacted each of the companies seeking ETC designation in Minnesota for purposes of the RDOF to determine whether each company would agree to abide by a list of 19 basic consumer protections that apply to competitive local exchange carriers and incumbent local exchange carriers in Minnesota,<sup>5</sup> and noted the Company did not receive the email.<sup>6</sup> The Company did receive an email from the Department, and responded on

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<sup>1</sup> Docket Nos. P-999/CI-21-86, *et al.*, Comments of the Minnesota Department of Commerce (Mar. 26, 2021) (“DOC Comments”).

<sup>2</sup> Docket Nos. P-999/CI-21-86, *et al.*, Comments of the Office of the Attorney General (Mar. 26, 2021) (“OAG Comments”).

<sup>3</sup> Docket Nos. P-999/CI-21-86, Notice of Extended Comment Period (Mar. 2, 2021) (extending the date for filing initial comments to March 26 and the date for filing reply comments to April 12).

<sup>4</sup> DOC Comments at 13-14; OAG Comments at 1, 22.

<sup>5</sup> DOC Comments at 9.

<sup>6</sup> DOC Comments at n.33.

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March 16, 2021 that the Company voluntarily agreed to comply with the 19 basic consumer protections.

Second, the Department stated that it contacted each of the companies seeking ETC designation in Minnesota for purposes of the RDOF to determine whether any of the requested ETC service territory included Tribal lands, and if so, to encourage the companies to start engaging with the Tribal governments in that service territory.<sup>7</sup> The Department indicated that the Company did not respond to the Department's request.<sup>8</sup> The Company, however, did respond to the Department on March 10, 2021, and informed the Department that the Company's requested ETC service territory did not include any Tribal lands.

With these two factual corrections to the record, the Company supports the recommendations of approval submitted by the Department and the OAG, and respectfully requests that the Commission designate the Company as an ETC for the provision of voice and broadband services on an expedited basis to occur prior to June 7, 2021.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

*/s/ Patrick N. Caron*

Patrick N. Caron (MN Bar No. 0386602)  
Assistant General Counsel  
Cable One VoIP LLC d/b/a Sparklight

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cc: Certificate of Service

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<sup>7</sup> DOC Comments at 10.

<sup>8</sup> DOC Comments at 11.

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**CERTIFICATE OF SERVICE**

I, Angela Collins, hereby certify that I have served a true and correct copy of the foregoing Reply of Cable One VoIP LLC d/b/a Sparklight to all persons on the attached list by electronic service.

Dated this 12th day of April 2021.

/s/ Angela F. Collins

Angela F. Collins

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
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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
Patrick	Caron	Patrick.Caron@cableone.biz	Cable One, Inc.	210 E Earll Dr  Phoenix, AZ 85012	Electronic Service	No	OFF_SL_21-161_M-21-161
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_21-161_M-21-161
Angela	Collins	acollins@cahill.com	Ionex Communications North, Inc. dba Birch Communications	1990 K St NW Ste 950  Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
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_21-161_M-21-161
Cherie R.	Kiser	ckiser@cgrdc.com	Cahill Gordon & Reindel LLP	1990 K St NW Ste 950  Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
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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_21-161_M-21-161