

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 Savage Communications RDOF ETC application  
MPUC Docket No. 21-86 and Docket No. 21-53

Dear Mr. Seuffert:

Attached please find the Reply Comments of Savage Communications.

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

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley  
Consultant for Savage Communications



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

Dear Mr. Seuffert,

These Reply Comments are provided on behalf of Savage Communications (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 a provider of broadband internet services and interconnected VoIP services. The Company is not a CLEC and does not believe it has to become a CLEC in this proceeding. The Company has met the requirements laid out in the MN Rules 7811.1400 and/or 7812.1400 for applications concerning ETCs. The Company has agreed to meet the FCC Regulations concerning ETCs.

The Company also believes the recommendations in the OAG Comments would impose additional obligations on entities in excess of the FCC RDOF program requirements. The recommendations that the Company opposes for RDOF 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 generally nonregulated broadband and VoIP providers, 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,

*/s/ Scott Savage*  
Scott Savage  
President  
Savage Communications