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March 12, 2021

VIA ELECTRONIC FILING

Minnesota Public Utilities Commission
121 7th Place E
Suite 350
St. Paul, MN 55101

Re: Interstate Telecommunications Cooperative, Inc. Petition for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act of 1934

Dear Sir/Madam:

Interstate Telecommunications Cooperative, Inc. ("Interstate") participated in the Federal Communications Commission's ("FCC") Rural Digital Opportunity Fund ("RDOF") Auction ("Auction 904") and was deemed a winning bidder for 391 locations in Minnesota in supported census blocks ("Funded Areas"). The census blocks are located outside of both its incumbent local exchange area and its CAF Phase II auction area and will be served by the Company's competitive local exchange ("CLEC") operations. In the attached petition, Interstate requests a new ETC designation for these Funded Areas, which will be given a Study Area Code upon final FCC authorization of RDOF funding.

Please find enclosed the application, and supporting documents, for approval from the Minnesota Public Utilities Commission which designates Interstate's Non-ILEC Operations as an ETC in the Funded Areas, pursuant to § 214(e) of the Communications Act of 1934.

Should you have any questions, please do not hesitate to call me at 301-459-7590.

Sincerely,

/s/ John Kuykendall

John Kuykendall
JSI Vice President

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

* * * *

**INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC. APPLICATION FOR
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

Interstate Telecommunications Cooperative, Inc. (“Interstate” or the “Company”) has been designated as an Eligible Telecommunications Carrier (“ETC”) in its incumbent local exchange (“ILEC”) service area to receive universal service support under Sections 214 and 254 of the Federal Telecommunications Act of 1996 and receives such support in the Minnesota exchanges identified in Exhibit A.I. In addition, Interstate was designated as an ETC in eligible census blocks in its competitive local exchange (“CLEC”) service area for Connect America Fund Phase II funded areas, identified in Exhibit A.II. Interstate participated in the Federal Communications Commission’s (“FCC”) Rural Digital Opportunity Fund (“RDOF”) Auction (“Auction 904”) and was deemed a winning bidder for 391 locations in the eligible census blocks in Minnesota in the census blocks identified in Exhibit B (hereinafter referred to as “Funded Areas”) which are located outside of its incumbent local exchange area and will be served by the Company’s competitive local exchange (“CLEC”) operations. In this petition, Interstate requests a new ETC designation for these Funded Areas, which will be given a Study Area Code upon final FCC authorization of RDOF funding. With this Application, and supporting documents, Interstate seeks an Order from the Minnesota Public Utilities Commission (“MPUC” or “Commission”) which designates Interstate’s Non-ILEC Operations as an ETC in the Funded Areas in the census blocks listed in Exhibit B, pursuant to § 214(e) of the Communications Act of 1934.

I. Background

On December 7, 2020, the Federal Communications Commission (“FCC”) released a Public Notice¹ announcing the conclusion of Auction 904. Areas that will receive support through this auction are locations in census blocks in rural areas served by price cap carriers that do not have access to broadband at speeds of at least 25 Mbps downstream and 3 Mbps upstream (“25/3”). The FCC has determined that these areas are rural, sparsely populated, and historically, there has not been a viable business case that makes financial and operational sense for investing in state-of-the-art broadband infrastructure in the absence of sufficient and predictable universal service support. The RDOF, grant funding, loans and other financial tools, provide sufficient incentives for entities, such as Interstate, to expand their existing footprints and serve the rural areas identified for support in Auction 904.

Carriers awarded support in this auction must deploy broadband to the specified number of locations in eligible census blocks in the census block groups in which they bid within a six-year period at the speed tier specified in their bid. Funding in the form of RDOF support will be provided monthly over a ten-year period based upon the amount of their winning bid.

Interstate participated in this auction and was among the 180 providers listed as provisional winners. Interstate will receive \$51,748.60 over a ten-year period to build a network capable of delivering 1 Gbps, low latency broadband to the 391 locations in the Funded Areas upon completion of certain post-auction requirements. One of these requirements is for Interstate to be designated an ETC in the Funded Areas by June 7, 2021.² Accordingly, grant of this application is vital for consumers in rural Minnesota to be able to receive high speed broadband. The services offered to these subscribers will be the same as Interstate provides other customers in its ILEC and CLEC service areas in Minnesota and

¹ Rural Digital Opportunity Fund Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021, Public Notice, AU Docket No. 19-126, WC Docket No. 10-90, DA 20-1422 (rel. Dec. 7, 2020) (“Provisional Winners PN”)

² *Id.* at p. 6.

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South Dakota. These services consist of both traditional TDM and IP-Voice Services, 1 Gbps Broadband service and a variety of managed support services.

II. Authority to Designate the Funded Census Blocks

Pursuant to 47 USC § 214(e)(2), a State commission may designate a common carrier that meets the requirements of 47 USC § 214(e)(1) as an ETC for a service area designated by the State commission. Further, the Commission has authority to designate telecommunications companies as ETCs to receive universal service support under sections 214 and 254 of the Communications Act of 1934, as amended by the Federal Telecommunications Act of 1996 (“the Act”) and has authority to designate geographic service areas for ETCs to receive the support.

47 USC § 153(11) defines a common carrier as "any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy, except where reference is made to common carriers not subject to this Act; but a person engaged in radio broadcasting shall not, insofar as such person is so engaged, be deemed a common carrier."³ Interstate provides telecommunications service as a common carrier and will continue doing so in the Funded Areas in which it seeks designation. Additionally, as demonstrated below, Interstate satisfies the requirements of Section 214(e)(1) for designation as an ETC in the Funded Areas. Accordingly, the Commission has the authority to designate Interstate as an ETC in the Funded Areas.

III. Interstate Satisfies All the Requirements for Designation as an ETC

Section 214(e)(1) of the Communications Act of 1934, as amended and Section 54.201(d) of the rules of the FCC require ETCs to, throughout their service areas for which designation is received, (1) offer the services supported by federal universal service support mechanisms, (2) either using its own

³ 47 USC § 153(11).

facilities or a combination of its own facilities and resale of another carrier's services, and to (3) advertise the availability of such services and the charges using media of general distribution.⁴

A. ETCs Must Offer Supported Services Through its Own Facilities or Through a Combination of its Own Facilities and Resale

In order to be designated as an ETC, a carrier must offer the services that are supported by universal support mechanisms, which are voice telephony services and broadband service as defined in Section 54.101 of the Commission's Rules⁵ either through its own facilities or a combination of its own facilities and resale of another carrier's facilities. Section 54.101(a)(1) defines voice telephony services eligible for universal service support as:

“services [that] must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; 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; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.⁶”

Section 54.101(a)(2) defines broadband Internet access services eligible for universal service support as:

“services [that] must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.⁷”

⁴ 47 U.S.C. §214(e)(1); 47 C.F.R § 54.201(d)(1). 47 C.F.R § 54.201(d)(1) defines the term “facilities” as meaning “any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support”

⁵ 47 C.F.R. §54.101.

⁶ 47 C.F.R. §54.101(a)(1).

⁷ 47 C.F.R. §54.101(a)(2). Section 54.101(c) requires ETCs “subject to a high-cost public interest obligation to offer broadband Internet access services” to offer broadband services “within the areas where it receives high-cost support.”

The FCC has additional buildout requirements for carriers that are awarded RDOF Auction support. Pursuant to these requirements, Interstate must deploy 1 Gbps broadband to the 391 locations in the Funded Areas within a six-year period.⁸

B. Interstate Hereby Demonstrates That it will Offer and Provide Each of the Above-listed Services Through its Own Facilities

1. Voice Grade Access to the Public Switched Network or its Functional Equivalent

Voice grade access to the Public Switched Network or its functional equivalent is provided by Interstate using its facilities-based network. Our use of Calix E7 last mile platform equipment allows IP delivery of voice, gigabit broadband Internet access between our Central Office in Hendricks and Lake Benton and the customer premise.

Both SIP and VoIP voice services will be offered to customers, with TDM services also available as needed. Equipment termination for voice services will be made via either our traditional IP voice switch at the Hendricks and Lake Benton Central Offices or our hosted VoIP platform as needed. Both are readily scalable far beyond current usage levels to easily accommodate increasing customer demand. Voice switching, gigabit broadband backhaul, customer care, network operations and administration will be shared with our current operations. Interstate already has data connection to the Internet and voice interconnection to the LATA tandem for the exchange of traffic.

2. Interstate Offers Minutes of Use for Local Service Provided at No Additional Charge to End Users

⁸ See *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, Public Notice, FCC 20-77, 35 FCC Rcd 686 (2020) ("*Auction 904 Procedures Public Notice*").

Interstate will offer voice products in the rate centers of the RDOF census blocks provisionally awarded to the Company. The local service includes free local call to the rate centers included with the line for a fixed price.

3. Interstate Will Satisfy the Requirement for Access to Emergency Services

Interstate will provide access to emergency services through 911 access to the Lincoln County Sheriff's communications center which serves as the PSAP for all rate centers, as provided in Interstate's existing operations today. The requirement that ETCs offer access to 911 or enhanced 911 ("E911") applies only "to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems."⁹

4. Interstate Will Offer Toll Limitation Services

As part of the requirement that ETCs offer Lifeline discounts to qualifying customers, FCC rules generally require ETCs to offer toll limitation services. Section 54.401(a)(2) of the FCC's rules states that toll limitation service "does not need to be offered for any Lifeline service that does not distinguish between toll and non-toll calls in the pricing of the service."¹⁰ Since Interstate distinguishes between local and toll calls, Interstate will provide optional toll limitation service at no additional charge.

5. Interstate Will Advertise its Universal Service Offerings

Interstate commits to advertise the availability of, and charges for, the supported services using media of general distribution, consistent with its existing advertising practices. The advertising will occur through a combination of media channels, such as the local newspapers in each community, website, TV ads and social media.

C. Interstate Meets the Additional Eligibility Criteria Adopted by the FCC

⁹ 47 C.F.R. § 54.101(a)(5).

¹⁰ 47 C.F.R. § 54.401(a)(2).

In its *2005 ETC Order*,¹¹ the FCC adopted additional criteria that all ETC applicants must satisfy in order to be granted ETC status. The criteria, as set forth in Section 54.202 of the FCC's Rules, require that an ETC applicant must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area; (3) demonstrate its ability to remain functional in emergency situations; (4) demonstrate that it will satisfy consumer protection and service quality standards.¹² To the extent applicable, Interstate will meet each of these additional criteria.

1. Interstate Certifies that it Will Comply with Service Requirements Applicable to the Support that it Receives

In its *2005 ETC Order*, the FCC required that an ETC applicant "make specific commitments to provide service to requesting customers in the service areas for which it is designated as an ETC."

Specifically, the FCC found that

"if the ETC's network already passes or covers the potential customer's premises, the ETC should provide service immediately. In those instances where a request comes from a potential customer within the applicant's licensed service area but outside its existing network coverage, the ETC applicant should provide service within a reasonable period of time if service can be provided at reasonable cost by: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other equipment; (3) adjusting the nearest cell tower; (4) adjusting network or customer facilities; (5) reselling services from another carrier's facilities to provide service;⁵³ or (6) employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment."

The FCC stated that if an ETC applicant determines that it cannot serve the customer using one or more of these methods, "then the ETC must report the unfulfilled request to the Commission within 30 days after making such determination."

¹¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

¹² *See*, 47 C.F.R § 54.202.

Interstate hereby certifies that it will comply with the service requirements applicable to the supported voice and broadband services that it will be offering in the Funded Areas, including the requirements for the RDOF auction program. Interstate submitted a certification by a professional engineer as part of its RDOF long form application, which stated that the Company's network is providing voice and data services to customers in the Funded Areas and the network capacity can handle the anticipated peak service loads.

2. Five-Year Plan for Proposed Improvements or Upgrades

Interstate will provide service to the locations for which it has been awarded support, consistent with the deployment obligations associated with the RDOF Auction program.¹³ All Interstate service areas are constructed with a 100% fiber optic network, with the ability to deliver gigabit services to every Interstate customer. The proposed buildout plan for the RDOF Funded Area is to extend the existing fiber network to those census blocks listed in Exhibit B.

3. Interstate Will Remain Functional in Emergency Situations

Interstate hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).¹⁴ Interstate's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Interstate to manage traffic spikes throughout its network, as emergency situations require.

¹³ See Exhibit C, map of proposed service area and list of Census Blocks and total number of units in Census Block, in awarded in the RDOF Auction.

¹⁴ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration 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 maintaining traffic spikes resulting from emergency situations."

Specifically, pursuant to Minnesota Administrative Rule 7810.3900, “Emergency Operations,” Interstate has established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide a minimum of four hours of battery service in each central office, and mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.

Interstate has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service. The Company also complies with the FCC’s backup power requirements that became effective in 2015.

4. Interstate Will Satisfy Consumer Protection and Service Quality Standards

In establishing this certification in its *2005 ETC Order*,¹⁵ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”¹⁶ The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement, and that the sufficiency of other commitments would be considered on a case-by-case basis.¹⁷ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”¹⁸

¹⁵ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

¹⁶ *Id.* at ¶ 28.

¹⁷ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new services; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

¹⁸ *Id.* at n. 72.

Interstate hereby certifies that it is complying with applicable service quality standards and consumer protection rules. Interstate is subject to service quality standards and consumer protection obligations under both federal and, to a limited extent under Minnesota State law as a telecommunications carrier subject to Minnesota Public Utility Commission regulation. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the MPUC which discloses rates, terms and conditions of service to customers; (2) adherence to state consumer protection and service quality requirements governing telephone providers which requires compliance with the Minnesota Administrative Rules;¹⁹ (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In addition, Interstate certifies compliance with broadband specific consumer protection obligations under both state and federal law. The federal law obligations include, but are not limited to the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in FCC 47 CFR Part 8 §8.3.

IV. Grant of This Application Will Serve the Public Interest

¹⁹ Applicable Minnesota Administrative Rules include: Records and Reports; Customer Relations; Customer Billing, Deposit and Guarantee Requirements; Disconnection of Service, Service Delay; Directories; Engineering; and Inspections, Tests, Service Requirements.

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Interstate is a member-owned rural local exchange carrier (“LEC”) headquartered in Clear Lake, South Dakota. Interstate was founded in 1954 and currently provides voice, broadband and IP-video services to more than 10,000 customers throughout Eastern South Dakota and portions of Western Minnesota. Interstate serves as a traditional LEC, and as a Competitive Local Exchange Carrier (CLEC). Interstate has been declared a winner for the FCC’s CAF Phase II auction and a provisional winner for the FCC’s RDOF Auction, and it continues to push its service area boundaries further and further into extremely rural areas that have been left behind in the digital divide.

Interstate’s focus is to provide quality communications services to its customers at a reasonable price, and Interstate is particularly in tune with the communications needs of Americans in extremely rural areas. Interstate’s service area has an average population density of 1.64 subscribers per route mile throughout the entire company. With this insight, Interstate plans to utilize the RDOF support in the Funded Areas as a particularly important source of funding, because it focuses on areas that are fundamentally similar to Interstate’s incumbent service territory. The individuals who benefit from RDOF support will now be able to stay connected to the world as well as access critical public safety, health, educational, and economically advantageous Internet-enabled services and applications.

Accordingly, it is in the public interest to expand designate Interstate as an ETC in the RDOF Funded Areas. Once the Commission grants Interstate’s ETC application and the FCC approves Interstate for funding, the Company will receive \$51,748.60 over a ten-year period which it will use “as intended” to deploy 1 Gbps broadband to those residing and working in the Funded Areas.

V. Conclusion

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Interstate requests that the Commission grant this application expeditiously without a hearing if no interested party has requested a hearing on this application after receiving at least twenty (20) days' notice of opportunity to request such a hearing.

Dated this 11th day of March, 2021.

Interstate Telecommunications Cooperative, Inc.



By: Tracy Bandemer, CPA, CEO/General Manager
312 4th Street West
PO Box 920
Clear Lake, SD 57226

Attachments

Exhibit A.1

Interstate Telecommunications Cooperative, Inc.

CURRENT ETC DESIGNATED AREAS

I. ILEC Service Territory

<u>Exchange</u>	<u>Town</u>	<u>State</u>
507-548	EAST ELKTON	MN
507-277	EAST GARY	MN
507-275	HENDRICKS	MN
507-368	LAKE BENTON	MN

Exhibit A.2

CURRENT ETC DESIGNATED AREAS

II. CLEC Service Territory – CAF II Funded Census Blocks

Winning Bidder	Census Block	State	County	Census Block Group
Interstate Telecommunications Company, Inc.	270812010011009	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011010	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011018	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011019	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011022	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011023	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011027	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011041	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011042	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011052	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011054	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011061	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011063	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011064	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011065	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011067	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011068	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011070	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011073	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011074	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011076	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011078	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011079	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011082	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011083	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011088	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011098	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011100	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011101	MN	Lincoln	270812010011
Interstate Telecommunications Company, Inc.	270812010011105	MN	Lincoln	270812010011

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Interstate Telecommunications Company, Inc.	270812010022142	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022149	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022155	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022160	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022161	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022163	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022165	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022171	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022172	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022180	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022182	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022183	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022187	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022192	MN	Lincoln	270812010022
Interstate Telecommunications Company, Inc.	270812010022206	MN	Lincoln	270812010022

Exhibit B

PROPOSED ETC DESIGNATED AREAS

III. RDOF Awarded Funded Census Blocks

Winning Bidder	Census Block	State	County	Census Block Group
Interstate Telecommunications Cooperative, Inc	270812010011003	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011004	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011011	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011012	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011015	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011017	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011024	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011028	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011035	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011038	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011043	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011047	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011048	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011050	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011051	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011053	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011055	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011059	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011060	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011075	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011090	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011092	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011093	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011095	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011099	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011102	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011103	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011104	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011106	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011107	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011108	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011109	MN	Lincoln	27081201001
Interstate Telecommunications Cooperative, Inc	270812010011112	MN	Lincoln	27081201001

Exhibit C

