

**NOTICE OF REQUEST FOR ADDITIONAL INFORMATION**

Issued: April 5, 2021

**In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners**

**PUC Docket Number(s):** P999/CI-21-86

**Filing Period:** Filing period closes April 19, 2021 at 4:30pm

*Filings received after the close of this period may or may not*

*be considered by the Commission.*

**Information Requested:** Please see and respond using the attached document and filing in the petitioner specific docket.

**Background**

In Minnesota, 24 companies, either singly, or in consortium with other providers, were winning bidders of \$408,150,745.60, to be distributed over ten years. These funds are in support of 142,852 locations that were previously unserved at 25/3 Mbps or greater. Most of the winning bidders committed to providing one gigabit per second of service.

By June 7, 2021, each winning bidder must demonstrate that it has high-cost eligible telecommunications carrier (ETC) status in all areas where the winning bidder will receive support. The winning bidder along with the associated ETC petition docket number are provided below:

**Petitioning Company**

Arrowhead Electric Cooperative  
Cable One VoIP  
CenturyLink, Inc.  
Consolidated Telephone Co dba CTC  
Farmers Mutual Telephone Company  
Federated Telephone Cooperative  
Garden Valley Telephone Coop  
Gardonville Cooperative Telephone Assn  
Halstad Telephone Company  
Interstate Telecommunications  
LTD Broadband LLC  
Midcontinent Communications  
Next Link Internet  
Paul Bunyan Rural Telephone Coop

**Docket No.**

P6888/M-21-52  
P7055/M-21-161  
P5096/M-21-158  
P406/AM-21-62  
P522/AM-21-77  
P523/AM-21-81  
P409/AM-21-84  
P527/M-21-73  
P530/M-21-83  
P515/AM-21-180  
P6995/M-21-133  
P6186/SA-21-124  
P7049/M-21-31  
P423/AM-21-56

Red River Rural Telephone Assn dba Red River Comm	P558/M-21-132
Roseau Electric Cooperative, Inc.	P6996/M-21-67
Savage Communications	P7051/M-21-53
Starlink Services, LLC	P7047/M-21-26
Wikstrom Telephone Company	P432/M-21-57
Winnebago Cooperative Telecom	P571/AM-21-92

**Filing Requirements:** Utilities, telecommunications carriers, official parties, and state agencies are **required** to file documents using the Commission’s electronic filing system (eFiling). All parties, participants and interested persons are encouraged to use eFiling: [mn.gov/puc](http://mn.gov/puc), select *eFiling*, and follow the prompts.

**Full Case Record:** See all documents filed in this docket via the Commission’s website at [mn.gov/puc](http://mn.gov/puc), select *Search eDockets*, enter the year (2021) and the docket number (86) and relevant company specific docket, select *Search*.

**Subscribe** to receive email notification when new documents are filed in this docket at [mn.gov/puc](http://mn.gov/puc), select *Subscribe*, or click [HERE](#) and follow the prompts.

**Questions about this docket or Commission process and procedure?** Contact Commission staff, Marc Fournier, at [marc.fournier@state.mn.us](mailto:marc.fournier@state.mn.us) or 651-201-2214 (voicemail; calls will be returned).

**Change your mailing preferences:** Email [docketing.puc@state.mn.us](mailto:docketing.puc@state.mn.us) or call Leesa Norton at 651-201-2246.

To request this document in another format such as large print or audio, call 651-296-0406 (voice). Consumers with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.

**Additional Information Requested from ETC Petitioners**

ETC Applicant Name:	Yes (Certify)/No	Additional Information (Attach additional pages as necessary)
MPUC Docket Number:	P7047/M-21-26	
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	
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 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).	Yes	The applicant does not yet offer voice services in Minnesota. Service will be rolled out in accordance with the RDOF milestones.
3. If so, will the applicant do so through its own facilities, meaning “any physical components of the telecommunications network that	Yes	The applicant has not yet determined whether it will provide voice services itself or

<p>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>in conjunction with a managed service provider or another carrier.</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>Matthew Johnson Senior Manager, Customer Success 1 Rocket Road Hawthorne, CA 90250 starlinkresolutions@spacex.com</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>Starlink Services’ voice telephony will have the required capabilities when service commences in accordance with the RDOF milestones.</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 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>Starlink Services will offer a 24-hour battery back-up option for user equipment that will provide the ability to make phone calls in the event of a power outage. At the system level, Starlink has designed redundancy into the network. For example, every user will have multiple satellites in view with which it can communicate. Additionally, every satellite will have multiple gateway sites in view with which it can communicate. In the event that a gateway site loses power from the electric grid, traffic will be automatically rerouted to an operating gateway site to ensure that service to each customer is not interrupted. Starlink Services will monitor its network 24x7x365 through its Network Operations Center located in Redmond, Washington. At</p>

		<p>scale, each satellite should have three or more potential gateway sites in view at all times to ensure that all of the satellite’s antennas are in use, and the system is fully redundant against a single gateway site going offline for any reason. SpaceX typically equips gateway sites with nine steerable antennas for diverse network redundancy. The system is designed to detect failure of any individual gateway antenna and remove it from service. Because end-users will be able to obtain service through multiple satellites and gateways, automatic traffic rerouting is essentially built into the system.</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>The applicant will ensure that its services are offered at rates that comply with 47 C.F.R. § 54.804(b)(2)(iii).</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>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).  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</p>	<p>Yes</p>	

<p>currently receives support and the number of Lifeline customers being served.</p> <p>b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c).</p>		
<p>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.</p>		<p>The applicant has not yet determined the vendor it will use, if any, for voice services.</p>
<p>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).</p>	<p>Yes</p>	