

August 30, 2023

Via E-Filing

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

**Re: Reply Comments of LTD Broadband, LLC
Docket No. P999/PR-23-8**

Dear Mr. Seuffert:

LTD Broadband, LLC (“LTD”), by counsel, hereby replies to the Comments of the Minnesota Department of Commerce (“DoC”) submitted on August 23, 2023 in the above-referenced docket with respect to the annual compliance affidavits filed by Eligible Telecommunications Carriers (“ETCs” or, singularly, an “ETC”) concerning use of Federal Universal Service Fund (“USF”) support administered by the Federal Communications Commission (“FCC”).¹ LTD disagrees with the DoC Comments to the extent that they urge both that (1) LTD not be certified for 2023 for existing ETC locations, where it is authorized for support under the Connect America Fund Phase II (“CAF II”) USF program (Study Area Code 369047), and (2) the matter of LTD’s ETC certification instead be deferred to an unrelated docket involving LTD’s eligibility for possible authorization for federal funding in the separate Rural Digital Opportunity Fund Phase I (“RDOF”) program.² As detailed below, the DoC has provided no credible basis for the Commission to merge the issue of LTD’s CAF ETC with the proceeding regarding LTD’s RDOF ETC, and withholding re-certification of LTD’s CAF ETC certification would be improper and prejudicial to LTD.

Under Section 54.314(a) of the FCC’s Rules, the Commission must certify that ETCs receiving high-cost funds are using the funds received in the preceding calendar year, and in the coming calendar year, “only for the provision, maintenance, and upgrading of facilities and

¹ See PUBLIC Comments of the Minnesota Department of Commerce, Docket No. P999/PR-23-8 (filed Aug. 23, 2023) (“DoC Comments”).

² See Docket Nos. P-6995/M-21-133 and P-558, P-6995/ M-22-221 (“LTD RDOF Docket”).

services for which the support is intended.”³ In order to make this certification, the Commission has established certain compliance requirements to be attested to by Minnesota ETC’s on an annual basis.⁴

As LTD has neither received nor been approved to receive RDOF support at this time, the affidavit it filed in July is unrelated to the LTD RDOF Docket and DoC is mistaken in seeking to tie these proceedings together.⁵ DoC apparently understands this, as Attachment A (Table 3) to the DoC Comments correctly states the Study Area Code (“SAC”) assigned to LTD’s CAF II authorization. (The FCC has not assigned a SAC to LTD’s RDOF area because it has not been authorized to receive RDOF support.) To the extent that questions have been raised regarding LTD’s potential authorization for RDOF funding, they relate to the scope of deployment proposed under that program specifically and have no impact on the CAF II program. CAF II and RDOF are distinct USF support programs, and LTD is designated as an ETC in Minnesota at different locations with respect to each program. LTD is performing as required in meeting its CAF II performance obligations and deployment milestones and continues to construct new infrastructure to meet the needs of unserved and underserved populations, including those in Minnesota. LTD’s affidavit presents no basis for a finding that the Commission should refuse to re-certify LTD.

The LTD RDOF Docket does not in any way involve LTD’s CAF ETC designation. Indeed, DoC readily admits that “certification in this docket and the outcome of the [LTD RDOF Docket] are separate, independent, and rely on different depth of analyses.”⁶ The only justification that it offers as a countervailing basis for nonetheless treating these two distinct proceedings as connected is its contention that federal law encourages it “to look deeper into *potential* ETCs when considering ETC designation.”⁷ But LTD is already an established ETC and has submitted its affidavit in performance of its existing ETC obligations relating to CAF II support. Looking deeper does not mean that DoC can simply intertwine LTD’s separate ETC designations into an ongoing proceeding involving only the RDOF ETC designation, particularly when there is no depth of analysis provided (indeed, no analysis at all) establishing any basis to connect the two matters.

³ 47 C.F.R. § 54.314(a). *See also* DoC Comments at 1.

⁴ *See Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of the Federal Universal Service Support Required Pursuant to § C.F.R 54.313*, Docket No. P-999/PR-18-8, Order, at 3-4 (issued Oct. 24, 2018) (“2018 ETC Certification Order”).

⁵ *See* DoC Comments at 16-17.

⁶ *Id.* at 16.

⁷ *Id.* at 17 (emphasis added).

DoC cites no defect in LTD's July affidavit that could justify withholding ETC certification, but instead opines that "USAC does not require an LTD certification this year" because it "did not receive high-cost funding for calendar year 2022."⁸ But this bare statement ignores the scope of the Commission's 2018 ETC Certification Order, which provides that the required affidavit must cover much more than just use of funds during the prior calendar year, including certifications with respect to potential use of funds in *the coming year*, compliance with applicable rules on service quality and consumer protection, and capabilities with respect to backup power and traffic management.⁹ Arbitrarily withholding certification for LTD, and LTD alone, would call into question without basis the entirety of LTD's ETC compliance certification for 2023.

In short, the vaguely articulated position that DoC has taken in its Comments is prejudicial to LTD's continued status as an ETC for purposes of the CAF II program. DoC's opaque assertion that an "explanatory statement consistent with the situation in the LTD Docket will prevent confusion"¹⁰ is unsupported by any substantive discussion or evidence and indeed would create significant confusion where there currently is none. Both the suggested conflation of this docket with the separate LTD RDOF Docket and the proposed withholding of ETC certification for 2023 would be improper and prejudicial. Accordingly, the Commission should re-certify LTD's ETC designation with respect to SAC 369047.

Please contact the undersigned if there are any questions concerning this matter.

Respectfully submitted,

/s/ Stephen E. Coran

/s/ David S. Keir

Stephen E. Coran

David S. Keir

Counsel to LTD Broadband, LLC

cc: Attached Service List

⁸ *Id.*

⁹ See 2018 ETC Certification Order at 3.

¹⁰ DoC Comments at 17.

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East Suite 350
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CERTIFICATE OF SERVICE

Annual Certifications Related to Eligible
Telecommunications Carriers' (ETCs)
Use of Federal Universal Service Support.

MPUC Docket No. P999/PR-23-8

On August 30, 2023, a true and correct copy of LTD's foregoing Reply Comments in MPUC Docket. No. P999/PR-23-8 was served on the persons on the attached service list by eService or by United States Mail, postage prepaid.

/s/ Stephen E. Coran
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On behalf of LTD Broadband LLC

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Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_23-8_PR-23-8
Kevin	Beyer	mpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_23-8_PR-23-8
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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_23-8_PR-23-8
Teresa	Crews	tcrews@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	Suite 100 1831 Anne Street Bemidji, MN 56601	Electronic Service	No	OFF_SL_23-8_PR-23-8
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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_23-8_PR-23-8
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Amy	Vick	amy.vick@itccoop.com	Interstate Telecommunications Coop., Inc.	312 4th St. W. PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_23-8_PR-23-8
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_23-8_PR-23-8
Lyle	Waughtal	lyle.waughtal@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_23-8_PR-23-8
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Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_23-8_PR-23-8
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Shane	Young	office@northern.tel	Northern Telephone Company	13448 County Road 25 Wawina, MN 55736	Electronic Service	No	OFF_SL_23-8_PR-23-8