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February 14, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East
St. Paul, MN 55101

VIA EFILE

Re: In the Matter of the Petition of Lake County for Relinquishment of Eligible
Telecommunications Carrier Designation, Docket No. P6944/RL-19-195

Dear Mr. Seuffert:

I write on behalf of my client, Lake County, to request that the Commission act on its pending petition for relinquishment of status as an Eligible Telecommunications Carrier ("ETC").

On January 29, 2015, Lake County filed a petition with this Commission to be designated as an ETC. Although not itself, authorized by this Commission to provide telecommunications services, Lake County met the requirements to be designated as an ETC by virtue of its ownership of a broadband network and contracting with a third party carrier to provide voice service using Voice Over Internet Protocol ("VOIP"), operate the network, and manage relationships with customers.

By Order dated July 27, 2015, this Commission granted Lake County's petition subject to conditions and required a compliance filing. Lake County subsequently made the required compliance filing and, by Order dated December 2, 2015, the Commission found that Lake County had satisfied the conditions set out in its July 27 Order and granted Lake County's petition without conditions. Lake County annually recertified its ETC status by filing Form 481 with the FCC and this Commission.

Lake County subsequently ran into unanticipated challenges obtaining financing necessary to complete the expansion of its network. Accordingly, Lake County embarked on a competitive bidding process to identify a purchaser for the network. Pinpoint Holdings, Inc. ("Pinpoint") was the winning bidder.

On February 28, 2019, Lake County filed a petition to relinquish its ETC status. In that petition, Lake County informed the Commission that it had entered into an agreement with Pinpoint under which Pinpoint would purchase Lake County's broadband network. Upon completion of that sale on June 3, 2019, Lake County no longer met the qualifications for designation as an ETC.

On May 17, 2019, Lake County also petitioned the Federal Communications Commission for relinquishment of its status as a Rural Broadband Experiments support

recipient and for waiver of the deployment schedule. FCC released its Order on Lake County's petition on December 18, 2019, and Lake County filed a copy of that Order with the Commission on December 27, 2019. In its Order, the FCC denied Lake County's request for a waiver and directed Lake County to return Rural Broadband Experiment funds it had received. Lake County has now repaid the funds as required by the FCC.

It is our understanding that the Commission had deferred acting on Lake County's petition until proceedings before the FCC could be completed. The FCC has now ruled and Lake County has complied with the obligations arising from that ruling. The last remaining issue is for the Commission to take action to formally grant Lake County's petition for relinquishment of its ETC status. Lake County respectfully requests that the Commission grant its petition.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gregory R. Merz', is written over the typed name.

Gregory R. Merz
Partner