

WINDSTREAM SERVICES, LLC

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April 23, 2021

**Via Electronic Filing**

Will Seuffert, Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Ste. 350  
St. Paul, MN 55101-2147

**Re: Windstream Communications, LLC's Response to Additional Information  
Requested from ETC  
Docket No. P6518/M-21-248**

Dear Mr. Seuffert:

Enclosed please find Windstream Communications, LLC's Response to the Additional Information Requested from ETC Applicants issued by Commission Staff in the above referenced docket.

Thank you for your consideration of this matter. If you have any questions, please contact me free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Nicole Winters'.

Nicole Winters  
Counsel II

Enclosure

**Additional Information Requested from ETC Petitioners**

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| <p>ETC Applicant Name:<br/><b>Windstream<br/>Communications, LLC</b></p>   | <p>Yes<br/>(Certify)/No</p> | <p>Additional Information (Attach additional pages as necessary)</p>  |
| <p>MPUC Docket Number:<br/><b>P6518/M-21-248</b></p>   |                             |   |
| <p>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).</p>   | <p>Yes</p>                  | <p>WC certifies that it will comply with the service requirements applicable to the supported services that it will be offering in the Census Block Groups. Upon request, WC will provide timely service to all customers within the Census Block Groups where WC’s network will provide coverage. If a potential customer is within WC’s licensed area but outside of its existing network coverage, WC will work to provide service at a reasonable cost. WC further certifies that it will comply with any applicable requirements for service specific to the RDOF Auction.</p>   |
| <p>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).</p> | <p>Yes</p>                  | <p>WC will provide voice telephony service via a fiber-based VoIP service that is interconnected to the PSTN. WC will utilize its proven fiber-to-the-premise network architecture to deliver VoIP services. The service will include minutes of use for local service provided at no additional charge to end users (specifically, WC’s service plans will offer unlimited usage within the United States); and access to emergency services via 911 and E-911, where implemented by local government or other public safety organizations. WC will also provide toll limitation services to qualifying low-income consumers or may charge the same prices for toll and non-toll calls in accordance with the FCC’s rules. WC is not currently an ETC provider in the State and does not have any active service subscribers in the state.</p> |
| <p>3.If so, will the applicant do so through its own facilities, meaning “any physical components of the telecommunications network that</p>   |                             | <p>WC will primarily offer supported services using its own facilities and may use a combination of its own facilities</p>  |

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| <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>and resale of another carrier’s services depending on the deployment scenario.</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>Andrea Curtis<br/> Director – Customer Service<br/> 1720 Galleria Blvd.<br/> Charlotte, NC 28270<br/> 800-326-6314<br/> <a href="mailto:CustomerAssistance@windstream.com">CustomerAssistance@windstream.com</a></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>See response to #2 above.</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>WC’s voice and broadband network is designed to remain functional in emergency situations without an external power source, will remain functional using backup power, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required. WC further monitors its networks with sophisticated equipment capable of detecting disruptions caused by emergency situations that allow WC to respond quickly.</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>WC will offer at least one standalone voice plan and one service plan that provides high speed broadband. These plans will be offered at rates that are reasonably comparable to rates offered in urban areas.</p>  |
| <p>8.Will the applicant satisfy additional requirements applicable to all high-cost ETCs, such as</p>   | <p>Yes</p> | <p>WC is familiar with the requirements in 47 CFR § 54.405 and will comply with these requirements for its service offerings in Minnesota.</p>   |

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| Lifeline obligations? 47 CFR § 54.405   |     |  |
| <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).</p> <p>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 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> | Yes | <p>WC commits to provide planned communications as described in 47 CFR §54.405(c) once these communications are developed. Because WC’s ILEC affiliate is already a Lifeline provider, it currently has information available on its website regarding the Lifeline Assistance Program:</p> <p><a href="https://www.windstream.com/about/windstream-information/lifeline-assistance-program">https://www.windstream.com/about/windstream-information/lifeline-assistance-program</a></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>WC intends to utilize its own network to provide the services in the census block groups listed in its Application. It may offer voice services through a resale relationship at a later date, however, WC does not currently have any resale contracts in place in the State.</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>  | Yes | <p>WC is aware of the notification requirements in 47 CFR 54.320(d) and will comply with these requirements in the event a milestone is missed.</p>  |