

April 19<sup>th</sup>, 2021

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

Re: In the Matter of the Minnesota Public Utilities Information Request sent to all Rural  
Digital Opportunity Fund (RDOF) Grant Winners

Dear Mr. Seuffert:

Attached please find Savage Communications response to the Minnesota Public Utilities Commission  
Information Request filed in Docket No. P7051/M-21-53.

Please contact the undersigned if further information is needed at 651-621-8306.

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley  
Consultant for Savage Communications

**Additional Information Requested from ETC Petitioners**

ETC Applicant Name: Savage Communications		
MPUC Docket Number: P7051/M-21-53		
	Yes (Certify)/ No	Additional Information (Attach additional pages as necessary)
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	Savage Communications certifies that it will comply with the service requirements applicable to the support that it receives.
2. Will the applicant offer standalone voice telephony service? See 47 CFR 54.101(b). 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.	Applicant is applying for ETC designation. Savage Communications provides a standalone interconnected VoIP offering for customers priced at \$34.95 and it includes local service, unlimited long distance and E911. Savage Communications web site is at: <a href="https://www.scibroadband.com/">https://www.scibroadband.com/</a>  Savage Communications has as of 1,405 voice customers. This figure is 19 % of its total customers.

<p>3. If so, will the applicant do so through its own facilities, meaning "any physical components of the telecommunications network that 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)(l) .</p>	<p>YES</p>	<p>Savage Communications will provide voices services in conjunction with its own facilities and reselling a VoIP provider's service. The VoIP provider is Momentum Telecom.</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>YES</p>	<p>The Customer Contact for Savage Communications is Patrick Hilke, Customer Experience Manager with an address of: Savage Communications, PO Box 810, 115 Tobies Mill Place, Hinkley, MN 55037. Telephone number of 320-384-7442, extension 701 and email address of patrick@scicable.net</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>Savage Communications' interconnected VoIP offering includes E911 service.</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>YES</p>	<p>Please see Attachment 1 which is Savage Communications Disaster and Recovery Plan.</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>YES</p>	<p>Savage Communications interconnected VoIP offering is priced at \$34.95.  The 2021 Annual urban rate survey for an unlimited or flat rate local service average rate is \$33.73. The reasonable comparability benchmark for voice services , two standard deviations above the urban average, is \$54.75.</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>Savage Communications will make available Lifeline Service to qualifying customers.</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).</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>	<p>YES</p>	<p>Savage Communications has provided proposed web pages covering Lifeline advertising to the Minnesota Department of Commerce staff. Savage Communications out of an abundance of caution has not made these lifeline web pages live. Once approval of its RDOF Long form is approved, Savage Communications will make those lifeline pages live. Savage Communications will also send out a yearly notice to customers reminding them about the lifeline program. Here is the link to mockup of its lifeline advertising:  <a href="https://www.scibroadband.com/lifeline-assistance/">https://www.scibroadband.com/lifeline-assistance/</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>YES</p>	<p>Savage Communications, Inc and Momentum Telecom are separate companies and not related in any way. Savage Communications has a contract with Momentum to resell VoIP 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 ROOF grant obligations? 47 CFR 54.320(d).</p>	<p>YES</p>	<p>Savage Communications will notify the Minnesota Public Utilities Commission, Minnesota Department of Commerce, Minnesota Attorney General Office, USAC and the FCC within 10 business days after the applicable deadline if it has failed to meet a build-out milestone.</p>



## **Disaster Prevention and Recovery**

3/11/2013

As a provider of critical communications services, whether commercial or life-line residential, Savage Communications, Inc. ("SCI") has an obligation to minimize the impact of adverse events up to and including disasters.

### **SCI Network**

The SCI fiber optic network provides private business data circuits, voice, Internet and video services across east central Minnesota. The SCI Network is our primary asset for providing service to customers.

#### Path Diversity and Owned Fiber

Core network paths are arranged as a ring or mesh architecture using diverse paths. This means that key network locations have two routes in and out. The switching equipment that makes up the network is capable of choosing either path within 60 seconds.

In the event of a fiber cut or facility event, the network is routed to an alternate path without impacting service. Upon subsequent repair, traffic is re-routed automatically and path redundancy restored. Fiber repair time is usually less than 6 hours in such cases.

Whenever possible, SCI owns, installs and maintains the fiber optic cable of the SCI Network. In some situations it may be necessary to lease fiber to complete redundancy. In the case of recent acquisitions or smaller, remote locations the SCI Network may contain non-diverse and or leased data circuits until expanding the redundant core is warranted.

#### Standby Power

Fiber optic networks require sites for periodic amplification or regeneration. These sites can be primary facilities where service is dropped off or OTNs (optical termination nodes). OTNs can be small buildings, huts, pedestals or even pole mounted enclosures. SCI Network contains several OTN locations.

Short duration commercial power failures are common on a widely distributed network. All components of our fiber optic network are deployed with standby power in the form of battery backup. Longer duration power failures such as those resulting from adverse weather conditions or disasters are less common but tend to occur somewhere on a yearly basis. Because of this, key locations on the core network also have LP generators in addition to batteries for sustainable power backup. Core locations that are small and remote are equipped with extended battery banks for continuity.

Standby power sites in rural edge locations such as those in residential neighborhoods are numerous. Covering each location with continuous power backup beyond batteries is not practical. For edge locations, portable generators are maintained to provide continuous coverage. For community-wide outages lasting several days, portable generators are pulled in from other communities as every community maintains a portable generator, trucks and qualified technicians. In addition, all standby power; small or large, is monitored by the NOC.

## Network Operations Center

The SCI Network Operations Center (NOC) is staffed by trained professionals 24 hours per day, 365 days per year. The NOC is tasked with monitoring all network components, basic troubleshooting, escalation, dispatch and ticket tracking, and serving as a central communications and command center.

All network components are deployed with status monitoring that reports back to the NOC. The NOC monitors several management consoles and acts upon events or critical trends as appropriate. The NOC also schedules and coordinates planned maintenance and service advisories.

The NOC has access to dynamic on-call scheduling as well as static escalation lists for various critical events and disasters. In the event of a disaster the NOC executes an established escalation and communication plan to ensure that the right resources are notified and dispatched to problem locations.

## Internet Service Provider ("ISP") Connection

The SCI Network includes a connection with ISP providers for business, Internet, and voice traffic. These providers are considered critical points and receive special consideration for recoverability.

First, SCI maintains connections with two Internet service providers providing redundancy should one provider fail. Should we lose an entire Internet provider for instance, we have the ability to maintain operations with the remaining provider. In addition, provider networks are always reviewed when selecting new circuits to ensure that provider paths don't overlap geographically.

Second, all equipment serving these local interconnections have redundant power, and spare equipment.

Lastly, all interconnection points are monitored by the NOC. We also monitor these points in the long term for capacity prediction since the turn up of additional service can have a long lead time.

## Geographically Diverse and Redundant Equipment

The most important characteristic of our facilities from a disaster prevention and recovery aspect is that they are geographically diverse. Since the upper Midwest is not prone to hurricanes or earthquakes it's very unlikely that a disaster-level event will affect multiple locations. The loss of one site will have a less than catastrophic impact on the network as a whole.

All critical equipment is deployed with spares available. On a temporary and emergency basis, the spares or redundancy of one site can be moved to recover a damaged site. In effect, each of our technical facilities has a backup depot nearby, but not close enough to be affected by the same disaster.

## Physical Security

Each of our primary facilities is considered a secure location. Doors are locked at all times and entry controlled by an ID system. All door entry is logged with records stored with the security provider.