



February 9, 2018

Minnesota Public Utilities Commission
121 Seventh Place
Suite 350
St. Paul, MN 55101

RE: Halstad Telephone Company Petition for ETC Designation in Minnesota
Docket No. P530/M-17-838

Commissioners:

I am writing to respond to comments filed by the Department of Commerce yesterday in this matter. Halstad Telephone Company disagrees with Department recommendation that reporting obligations are imposed as a condition of being designated a Lifeline Only ETC.

The Department has recommended that Halstad be granted Lifeline Only ETC designation provided it complies with 47 U.S. Code § 214(e) Provision of Universal Service (1) Eligible Telecommunications Carriers. This Code establishes that ETCs are eligible to receive universal service support, and therefore are required to: 1) offer the support services; and 2) advertise the availability of such services. Halstad, as a Lifeline Only ETC will not receive universal service support for the construction and maintenance of last-mile facilities, yet the Department proposes that Halstad be required to report each instance where special construction charges would apply and the disposition of that proposal.

Would-be customers, from outside planned project areas, approach Halstad frequently during construction season, perhaps 2-3 times per week. Special construction charges can apply when facilities do not run down a road or street, or if a new pedestal must be placed. Fiber placement costs are approximately \$15K per mile in rural areas, and higher in town. Special construction charges are rarely employed, primarily because the costs can be prohibitive.

I urge the Commission to reject the Department's proposed reporting requirements related to facilities placed without universal service support. The Commission should grant Halstad's petition for Lifeline Only ETC designation, which will promote the availability of discounted Lifeline services to qualifying customers.

If you have any questions regarding this matter please call me at 218.456.2125.

Sincerely,

s/ Mark Forseth

Mark Forseth
General Manager,