

December 20, 2021

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

RE: Reply Comments of the MN Department of Employment and Economic Development, in Response to the PUC Notice of Comment Period in In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners, Docket No. P-999/CI-21-86

Dear Mr. Seuffert,

The Department of Employment and Economic Development (DEED) appreciates the opportunity to provide these brief reply comments in response to the Commission's Notice of Comment Period issued on June 30, 2021 and the initial comments received. In that Notice, the Commission requested comments on the roles of various state agencies, including the Department of Employment and Economic Development, in the Commission's process for designating and regulating Eligible Telecommunications Carriers (ETCs).

It is clear that broadband providers receiving federal funding under the FCC RDOF program are required to be ETCs. Other federal broadband funding programs each have their own methods to ensure accountability: the American Rescue Plan Act (either from State and Local Fiscal Recovery Funds or Capital Projects Funding); the U.S. Department of Agriculture's ReConnect and Community Connect programs; the National Telecommunications and Information Administration's Broadband Infrastructure Program and Tribal Connectivity Program; Housing and Urban Development's Community Development Block Grant funding for broadband; CARES Act funding used for broadband and the recently enacted Broadband Equity, Access and Deployment (BEAD) Program.

The state's Border-to Border-Broadband Infrastructure grant program, administered by DEED, also has its own process to ensure accountability. With significant federal funding already or becoming available, including the funding that DEED will be administering to ensure border-to-border broadband access across the state, DEED will use its limited resources to focus on awards and administer funding, as necessary. While the RDOF funding scheduled to be awarded to bring broadband services to locations in Minnesota is important, it is only a small piece of the funding puzzle and those entities with a direct stake in that funding can best respond to the issues raised in the Notice.

We appreciate the opportunity to provide these comments and would be happy to provide clarification to any of our comments if that would be helpful.

Sincerely,



Commissioner