

**Docket Number:** TC17-009  
**Subject Matter:** First Data Request  
**Request to:** ExteNet Systems  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** 4/6/17  
**Responses Due:** 4/20/17

1-1. Has the company provided notice pursuant to ARSD 20:10:32:04?

Response: ExteNet is providing notice contemporaneous with this response.

1-2. Refer to Exhibit F. Provide when the company was granted authorization to do business in each state it does business in.

Response: An updated Exhibit F-1 is submitted with this response.

1-3. Refer to section 8 on page 3. The company says it will provide service “on a fiber optic cable through a combination of deploying its own network and facilities, and services leased from a variety of existing carriers and other suppliers.” Will the combination of using the company’s own facilities and leases not require any interconnection agreements? If not explain in more detail how this system will work where it will not require any interconnection.

Response: ExteNet will not require an interconnection agreement because it acts as an intermediate carrier providing service to other carriers. ExteNet’s point-to-point fiber optic transport service accepts traffic handed off from another carrier and transports the traffic to a different location designated by the customer.

ExteNet intends to lease third party owned facilities such as dark fiber. The leasing of those facilities does not require an interconnection agreement with the facility owner. However, to the extent that ExteNet’s services and ownership of network facilities obligate ExteNet to enter into interconnection agreements with other carriers, ExteNet will do so. Further, ExteNet’s carrier customer typically maintains its own interconnection agreements in place for routing the traffic over the carrier’s network and to the PSTN.

1-4. Refer to section 8 on page 2 and 3, and section 9 on page 4. Section 8 states the applicant seeks authority to provide local exchange telecommunications services throughout the State of South Dakota. Section 9 states that the applicant does not seek to operate in areas of the state designated as rural service areas. Confirm if the ExteNet is looking for designation statewide or just in the non-rural, CenturyLink, territories.

Response: ExteNet is seeking authority to provide service in all areas of South Dakota where competition is authorized, including rural areas.

To clarify in response to SDTA’s petition to intervene, ExteNet does not provide, nor does it intend to provide, exchange access or local exchange end user services in rural areas. ExteNet does not have an access tariff, nor does it handle the termination of switched calls incoming from an interexchange carrier's network.

- 1-5. Refer to section 20 on page 8. Has ExteNet ever had any issues related to this rule since the start of the company?

Response: The applicant is not currently, nor has ever been, the subject of an investigation by a state or federal regulatory authority related to its provision of telecommunications services.

- 1-6. Explain why the company is showing an \$11 million loss for the successor on the Consolidated Statements of Operations and Comprehensive Loss sheet.

Response: Please see the response attached as Confidential Attachment 1.