

**TO:** COMMISSIONERS AND ADVISORS  
**FROM:** LORENA REICHERT AND KRISTEN EDWARDS  
**SUBJECT:** TC17-044 – REQUEST OF CLARITY TELECOM, LLC DBA VAST BROADBAND STUDY AREA: ILEC-391652 AND CLEC-399006 FOR CERTIFICATION REGARDING ITS USE OF FEDERAL UNIVERSAL SERVICE SUPPORT  
**DATE:** AUGUST 25, 2017

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#### STAFF MEMORANDUM

On June 30, 2017, the Commission received Clarity Telecom, LCC dba Vast Broadband's Annual ETC Certification Filing with Confidential Exhibits A-1 and A-2, B-1 and B-2, D-1 and D-2 and Exhibits B-3 and C, and its Lifeline/Link Up Annual Report. In addition, Clarity Telecom responded to staff data requests on August 11, 2017 and August 23, 2017.

Staff has included with this memo two maps to illustrate the information provided to the FCC from the company in 2016. All speed and census block information was found in the data provided in the State Level Dataset for Fixed Broadband Deployment Data from the FCC Form 477, Data as of June 30, 2016 (version 2). These maps are provided to easily isolate company buildout for certain speeds for the ILEC Study Area and its surrounding competitive areas.

The map labeled "Vast June 2016 Deployment Data – All Speeds" shows all census blocks and speeds that were submitted by Vast to the FCC in the southeastern corner of the state. The maximum advertised download speed is light green for 8 mbps, dark blue for 50 mbps, and dark purple for 200 mbps. Vast's ILEC territory is shown in light tan, CenturyLink territory in light blue, and all other territories in light pink. This map and the FCC data do not show any speeds of [Begin Confidential] [REDACTED] [End confidential] download deployment, which staff found to be inconsistent with information provided by the company in this filing.

The map labeled "Vast June 2016 Deployment Data – Speeds above 10 mbps" shows all census blocks and speeds that were submitted by Vast to the FCC that are over 10 mbps maximum advertised download speed. When comparing the two maps, it is clear that a majority of the ILEC area is below 10 mbps. In addition, most of Vast's deployment above 10 mbps is in the surrounding competitive census blocks. Vast has other competitive areas which have over 10 mbps deployed, in the Black Hills and in Watertown, which are not shown in these maps.

As shown in responses to Staff's data requests 1-2(c) and 1-3, the company intends to provide internet service largely through [Begin Confidential] [REDACTED] [End Confidential]. As the Commission is aware, many other companies throughout South Dakota have deployed fiber, even in rural areas. [Begin Confidential] [REDACTED]

[REDACTED]

[End Confidential]

Finally, as noted in responses Staff's data request 1-10 and 2-6, the company does not currently provide a directory. [Begin Confidential]

[REDACTED]

[End Confidential]