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September 6, 2017

Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
500 East Capital Avenue
Pierre, SD 57501

RE: TC17-046 West River Telecommunications Cooperative (“WRT”) Annual ETC
Certification Filing

Dear Ms. Van Gerpen

During the PUC meeting on August 15, 2017, Chairman Nelson asked certain questions regarding information captured from FCC Form 477 broadband data, filed by WRT in June of 2017, in comparison to broadband deployment progress noted by WRT in its current ETC Certification filing.

We have completed Form 477 broadband speeds available based on the speeds advertised to our entire service territory. We would like to clarify these are the maximum speeds or “up to” speeds available on our network. We currently have areas where it would be difficult to provide this speed prior to completion of our fiber deployment that was referenced in our five-year plan and in the progress report within our ETC filing.

In the FCC Form 477 Instructions, Section 5.3, entitled Fixed Broadband Deployment, references “How Should I format My Fixed Broadband Deployment Data” and further explains what should be included as the “Maximum Advertised Downstream Bandwidth, Consumer.” In this document, it indicates if the company is mass marketing its service, then the maximum advertised downstream bandwidth should be entered for the respective census block.

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If you have additional questions in reference to the information filed on the Form 477, please contact me.

Very truly yours,

RITER, ROGERS, WATTIER &
NORTHROP, LLP

By:

Darla Pollman Rogers

DPR/aev

CC: West River Telecommunications Cooperative