



September 6, 2017

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

RE: TC17-050 Kennebec Telephone Company, Inc. 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 the FCC Form 477 broadband data, filed in June 2017, in comparison to broadband deployment progress noted by Kennebec in its current ETC Certification filing.

Based on further conversation with PUC Staff it is our understanding the data shown on the PUC maps associated with fiber deployment was summarized by capturing all census blocks with fiber deployed in the block. At this time we would like to clarify we have several blocks with dual technology in them today, both fiber and DSL. We are in the process of retiring the copper facilities but some locations within several blocks continue to utilize the copper to deliver service requested by the customer. As our customers ask for broadband for the first time or increase to a speed that would be better provisioned over fiber we work to install the fiber loop to the customer from our fiber route already in the block.

Some customer locations will not likely ever require fiber technology so in order to maintain our expenses at manageable levels we continue deployment as requested and/or as essential. So for an interim time period we will not have fiber to every customer location but would be able to extend fiber to a customer requesting the service that required fiber "within a service interval that is typical for that type of connection – that is, without extraordinary commitment of resources"¹.

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

Sincerely,

A handwritten signature in black ink that reads 'Marlene Bennett'. The signature is written in a cursive, flowing style.

Marlene Bennett
Consortia Consulting, Inc.

CC: Kennebec Telephone Company, Inc.

¹ FCC Form 477 Instructions section 5.3 Fixed Broadband Deployment, Available: For purposes of this form, fixed broadband connections are available in a census block if the provider does, or could,.....- provision two-way data transmission to and from the Internet with advertised speeds exceeding 200 kbps in at least one direction to end-user premises in the census block.