

Docket Number: TC18-057  
Subject Matter: Staff's Data Request 1  
Request to: Crown Castle Fiber LLC  
Request from: South Dakota Public Utilities Commission Staff  
Date of Request: 9/28/18  
Responses Due: 10/12/18

**1.1. If Crown Castle Fiber LLC will not provide traditional switched local exchange, interexchange, voice or switched access services, what is the reason why Crown Castle Fiber seeks a Certificate of Authority to provide facilities-based and resold local exchange and interexchange telecommunications services throughout the State of South Dakota?**

**RESPONSE:** Crown Castle Fiber LLC ("Crown Castle Fiber") intends to provide telecommunications services. Crown Castle Fiber plans to provide Private Line services, including Ethernet and Wavelength services, dark fiber, dedicated Internet access and collocation services to wholesale (e.g., other carriers) customers and customers in government, health care, education, financial services, and other enterprises. Upon completion of the *Pro Forma* Consolidation (as described in the Application), Crown Castle Fiber also will provide the fiber connectivity and related small cell or distributed antenna system (DAS) of its affiliate Crown Castle NG Central LLC ("CCNG-Central"), who currently holds a Certificate of Authority ("Certificate") to offer non-switched local transport services in South Dakota pursuant to an Order adopted in Docket No. TC14-081.

In addition to authorization to provide telecommunications services, Crown Castle Fiber seeks a Certificate in order to facilitate access to the rights to occupy state, municipal and local rights-of-way as a certificated telecommunications carrier. Crown Castle Fiber will design the service for its customers and, where using its facilities, will construct and install the fiber and equipment. Typically, Crown Castle Fiber's facilities are customer/carrier-neutral. Crown Castle Fiber's fiber will be available to all wholesale and enterprise customers to the extent capacity is available.

**1.2. What elements of the Crown Castle Fiber LLC's business necessitates a certificate of authority from this Commission?**

**RESPONSE:** Crown Castle Fiber's private line and CCNG access services necessitate a Certificate of Authority from the Commission. Under S.D. Code § 49-31-3, each telecommunications company that plans to offer or provide interexchange telecommunications service or any local exchange service must obtain a certificate of authority from the Commission. Section 49-31-1 defines local exchange service as "the access to and transmission of two-way switched telecommunications service within a local exchange area." Switched is defined as "providing circuit, packet, or channel type switching, each suited to specific application requirements." The Code defines telecommunications service as "the transmission of signs, signals, writings, images, sounds, messages, data or other information of any nature by wire, radio, lightwaves, electromagnetic means, or other similar means." Interexchange telecommunications service is "telecommunications service between points in two or more exchanges." Furthermore, Section 20:10:24:01 of the Administrative Rules defines intrastate telecommunications services as "telecommunications service that are functionally intrastate, with points of origination and termination within South Dakota, regardless of the specific routing of the affected traffic." Accordingly, to the extent that the end points for Crown Castle Fiber's private lines are within South Dakota (such as connecting two or more locations via fiber-based point-to-point circuits or multipoint circuits), these products may be considered intrastate telecommunications services, which would require a Certificate in South Dakota. CCNG-Central's fiber connectivity and

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DAS business lines also provide access to a local exchange for its carrier customers' switched voice and data services. For the Commission's reference, Exhibit A contains a graphic illustration of Crown Castle Fiber's proposed Ethernet (E-LINE and E-LAN) and Wavelength Products including their network architecture.

**1.3. What specific types of telecommunications services does Crown Castle Fiber LLC wish to provide in South Dakota and will it take place in the areas of rural local exchange carriers?**

**RESPONSE:** Crown Castle Fiber's proposed products include private line services, which are point-to-point transport services. While in some cases customers may use Crown Castle Fiber's private line products to connect to the Internet, customers may also use them for other purposes such as connecting two or more locations. For example, the Company's proposed private line products may enable the transmission of data between an enterprise headquarters and its satellite offices or between a hospital and its affiliated health care provider. Such products will be offered to the public on both a wholesale (to other carriers) and retail basis. Wholesale carriers may use Crown Fiber's private lines as underlying circuits for the provision of telecommunications services to their end-users.

Crown Castle Fiber seeks to provide these services throughout the state of South Dakota, including in the areas of rural local exchange carriers. Crown Castle Fiber proposes to provide services which do not require interconnection with incumbent local exchange carriers. See Application at ¶13, pp. 9-10. In addition, Crown Castle Fiber does not seek to provide telephone exchange services or switched access services within rural telephone company service areas. See Application at ¶15, pp. 10-11.

**1.4. Provide a list of all affiliates associated with Crown Castle Fiber LLC. Including those not authorized to provide telecommunications services.**

**RESPONSE:** A list of all subsidiaries of Crown Castle International Corp. ("CCIC"), Crown Castle Fiber's ultimate parent, from its most recent SEC 10K is attached as Exhibit B. Crown Castle Fiber was formerly known as Lightower Fiber Networks II, LLC as shown in Exhibit B. Evidence of the change in name to Crown Castle Fiber was provided as Exhibit A to the Application.

**1.5. Will Crown Castle NG Central LLC request cancelation of its Certificate of Authority after completion of the Pro Forma Consolidation as it will be consolidated into Crown Castle Fiber LLC and no longer be a surviving entity after the transaction?**

**RESPONSE:** Crown Castle NG Central LLC and Crown Castle Fiber LLC intend to file a notice of the *Pro Forma* Consolidation (as described in the Application) prior to completion of the consolidation pursuant to S.D. Code § 49-31-20. A request to cancel the Certificate of Crown Castle NG Central LLC will be filed promptly following completion of the *Pro Forma* Consolidation.