

Filed and Submitted via email to SDPUC staff

April 22, 2021

**Docket Number:** TC21-010  
**Subject Matter:** Staff's Data Request 1  
**Request to:** Alliance Communications Cooperative, Inc. dba Alliance Communications  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** 4/8/21  
**Responses Due:** 4/22/21

Alliance Communications Cooperative, Inc. dba Alliance Communications (Alliance) received the SDPUC Staff data request in the above docket and hereby provides the following responses. **The Alliance representative responsible for each response below is:**

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General Manager / CEO  
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1.1. Identify any Alliance RDOF awarded census blocks that partially or completely overlap in and RLEC territories.

*Response: As a part of its filing, Alliance provided Exhibit A which indicates the census blocks Alliance is seeking ETC designation in as well as a visual depiction of these locations on a map. These census blocks are all located in Lumen (formerly known as CenturyLink), Clarity Telecom dba Vast Broadband, and Citizens/Frontier Minnesota service areas and not any RLEC areas.*

1.2. Provide Alliance's RDOF Long Form Technical Submission.

*Response: Please see attached Exhibit C.*

1.3. Provide Alliance's Long Form 683.

*Response: Please see attached Exhibit D.*

1.4. Upon completion of the RDOF buildout, what speeds will Alliance offer?

*Response: Alliance currently provides service packages ranging from symmetrical 50 Mbps speeds to 1 Gbps. In all its current service areas, customers can receive any of these packages including up to 1 Gbps. FCC RDOF buildout rules require the speed tier bid to be available to 70% of all customers at any one time. Alliance's network will be designed to meet this requirement.*

1.5. Does Alliance have or plan to utilize its own facilities in the areas in which it seeks lifeline only ETC designation?

*Response: Alliance intends to leverage its existing FTTP network in addition to adding more of its own facilities and leasing some facilities from SDN Communications for transport fiber to serve the entire requested ETC service area.*

1.6. Has Alliance provided a copy of its petition to other Telecommunications companies that currently serve as an ETC within the map on Exhibit B? If so, please provide a list of those companies notified and documentation outlining its notification.

Response: Yes, Alliance provided a copy of its petition to representatives of Lumen (formerly known as CenturyLink), Clarity Telecom dba Vast Broadband, and Citizens/Frontier Minnesota via email. These companies are the only other telecommunications companies serving within the requested service area.

1.7. Through what technology does Alliance intend to serve the areas it's seeking lifeline only ETC status?

Response: Alliance intends to utilize its current FTTP technology in addition to adding more fiber onto its network in order to serve the additional requested service area. Alliance customers have been fully served by fiber since 2013 and Alliance intends to continue this standard of fiber service going forward.

1.8. Does Alliance hold or intend to apply for a Certificate of Authority in those areas its seeking lifeline only ETC status?

Response: No, Alliance will provide interconnected VoIP voice service in those areas outside its ILEC area where it does not have a CLEC certification.

1.9. Exhibit B appears to show Alliance requesting ETC designation in just a portion of a rural telephone company. Does federal rule or statute allow for the Commission to designate Alliance as an ETC in just a portion of the company's complete service area?

Response: Exhibit B does not show or request ETC designation in any rural telephone company service area. Alliance does not seek ETC status in any rural telephone company service area.