

**Valley Telephone Company Revised Response 5/31/2019**

Docket Number: TC19-011  
Subject Matter: **REVISED First Data Request – *Additional information provided is in bold and italic font***  
Request to: Valley Telephone Company  
Request from: South Dakota Public Utilities Commission Staff  
Date of Request: May 16, 2019  
Responses Due: May 23, 2019

1- 320-594

1-1. Refer to DR 1-5 in TC18-047. Provide updated numbers for the end of 2018.  
*(DR -1-5 in TC18-047 asked: what percentage of ACAM areas did Valley Telephone Company complete by end of 2017?)*

**Response:**

**Percentage of ACAM areas in SD complete by end of 2018 = 100%**

**Progress compared to FCC ACAM requirements: 100%**

1-2. Refer to DR 1-6 in TC18-047. Provide updated numbers for the end of 2018.  
*(DR-1-6 in TC18-047 asked: How many of Valley Telephone Company's locations in South Dakota are eligible for ACAM funding? How many locations have been deployed?)*

**Response:**

**Number of locations eligible for ACAM in SD as of 2018: 230**

**Number of locations in SD considered served via ACAM definition for 2018: 174**

**Additional deployed in SD not receiving ACAM funding for 2018: 56**

**Additional Information provided:**

***As documented in FCC DA-16-869A1, the FCC combined all study area codes of rate-of-return ILEC's and its affiliates and established holding company codes. Park Region Mutual Telephone Company "PRKR" combines Study Area Codes 361450 and 361495 for the purpose of CAF A-CAM support and broadband location obligations. PRKR provided a location count for those Census Blocks that are within the South Dakota portion of their Study Area. The FCC gave CAF A-CAM awarded companies four years to upload all of their locations into the HUBB reporting system, in 2017 and 2018 PRKR uploaded 174 locations of active subscribers within the SD study area into the portal. Valley will be reporting more locations that refused a drop but can be deployed with the ACAM 10 business day window in the 2020 HUB report. By definition, they are complete but not yet reported to the HUBB, reconciling our response as haven completed 100% of the A-CAM commitment. All SD current and potential customers have or would be served by FTTH.***

***In additional to those census blocks that receive CAF A-CAM funding there are additional census blocks within the SD study area that were not eligible for CAF A-CAM funding. It is a coincidence that the # of locations eligible for ACAM in SD in 2018 less the number of locations in SD served via ACAM definition equals 56 and the fact that the addition deployed in SD not receiving ACAM funding in 2018 is 56.***

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***Valley built FTTH to these additional 56 locations where it did not receive ACAM funding and has not reported these into the HUBB.***

1-3. Does Valley Telephone Company notify new and existing customers of the availability of federal lifeline assistance? If so, what type of media does Valley Telephone Company use to provide Lifeline information to customers? Provide examples where applicable.

**Response: Yes. See attached.**

1-4. If the waivers are granted would Valley Telephone Company be willing to submit verification from the Minnesota Public Utilities Commission as soon as a decision is made on certification of Valley Telephone Company in Minnesota?

**Response: Yes, please see the attached Minnesota Public Utilities Commission Order Certifying Eligible Telecommunications Carriers' Use of Federal High Cost Subsidy and Requiring Comment Period in Docket No. P-999/PR-18-8 issued October 24, 2018. The Order includes an Attachment 1 which is a list of approved ETCs. On page 3 of the Attachment please note that Valley Telephone Company is listed as an approved ETC. The Minnesota Public Utilities Commission 2019 Docket for ETC Certification is pending. If necessary, the Company can provide the Commission's Order when it becomes available.**

1-5. Were there any voice service outages of 30 minutes or more, unfulfilled service requests for voice or broadband service, or complaints received from customers related to voice or broadband in 2018 for Valley Telephone Company's South Dakota customers? If so, explain.

**Response: No**

1-6. What percentage of Valley Telephone Company's customers fall under South Dakota jurisdiction?

**RESPONSE:**

**Response: 37% of Valley's customers that fall under South Dakota jurisdiction.**

***Additional Information Provided:***

***Legally, Valley Telephone Company is a separate legal entity from Park Region Mutual. Valley Telephone Company has its own study area.***

***Park Region Mutual is the Parent Company that owns 100% of Valley Telephone Company.***

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***Valley Telephone Company serves customers located in Minnesota and South Dakota. Valley Telephone serves a total of 463 customers located in these two States. Valley Telephone Company has 292 Customers in Minnesota and 171 customers in South Dakota. Therefore, the % of Valley Customers in Minnesota is 63% (under the jurisdiction of the Minnesota Public Utilities Commission) and the % of Valley customers under South Dakota jurisdiction is 37%.***

***As documented in FCC DA-16-869A1, the FCC combined all study area codes of rate-of-return ILEC's and its affiliates and established holding company codes. Park Region Mutual Telephone Company "PRKR" combines Study Area Codes 361450 and 361495 for the purpose of CAF-A-CAM support and broadband location obligations. For other regulated and support programs Valley Telephone Company (SAC 361495) is reported as a separate legal entity.***

- 1-7. Please file an affidavit executed by a corporate officer attesting that the carrier only used support during the preceding calendar year and will only use support in the coming calendar year for the provision, maintenance, and upgrading of facilities and services for which support is intended.

**Response: See attached affidavit from Valley Telephone Company's General Manager, Dave Bickett.**