



June 17, 2019

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capitol Building – 1st Floor
500 East Capitol Avenue
Pierre, South Dakota 57501-50570

**Re: Responses to First Data Request.
Docket Number: TC19-013**

Dear Ms. Van Gerpen:

Attached are the responses of Citizens Telecommunications Company of Minnesota, LLC to the first data request of the Commission staff in Docket TC19-013.

Please contact me at (952) 491-5534 if you have questions.

Sincerely,

/s/ Scott Bohler

Scott Bohler

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Docket Number: TC19-013
Subject Matter: First Data Request
Request to: Citizens Telecommunications Company of Minnesota, LLC
Request from: South Dakota Public Utilities Commission Staff
Date of Request: June 13, 2019
Responses Due: June 27, 2019

1-1. At last year's August 22, 2018 Commission meeting, Scott Bohler indicated that Citizens' 15 CAF II eligible census blocks in the South Dakota portion of the Jasper exchange would be built out in 2019 and 2020. Provide an update on which, if any, census blocks are complete and the dates the remaining blocks are scheduled to be done.

Response) Citizens did not undertake any CAF II projects in the South Dakota census blocks during 2018. At this point, Citizens does not have any CAF II projects planned for 2019. We will review these census blocks again for 2020.

1-2. A recent investigation by the Minnesota Commerce Department alleges a wide range of issues concerning Citizens' business practices in Minnesota including:

- Frequent and lengthy service outages, including loss of customer access to 911 emergency services.
- Delays in repairing and restoring service.
- Failure to provide expedited responses to service outages affecting vulnerable customers with medical needs.
- Disconnection of service without notification.
- Failure to maintain and repair equipment, causing service outages and leading to public safety hazards such as lines and damaged equipment on the ground.
- Lack of investment in infrastructure to ensure reliable service.
- Frequent billing errors, including inaccurate and unauthorized charges.
- Failure to provide refunds or bill credits for service outages.
- Lack of timely, responsive customer service, including lengthy call wait times, inaccurate information and "lost" repair tickets.
- Discriminatory practices such as prioritizing new service installations over repairs of existing service and providing slower repair services in rural areas compared to more populated areas.

Has Citizens received any complaints, formal or informal, in 2018 or thus far in 2019 from its South Dakota customers related to any of these issues? If so, provide information explaining each complaint and how the problem was or will be resolved.

Response) Citizens has not received any complaints in 2018 or to date in 2019 related to these issues regarding its service in South Dakota.

1-3. In docket TC18-038, Citizens reported 42 access lines in South Dakota, and this year it reported 37 access lines in South Dakota. Was any of the poor business practices listed in DR 1-2 given as a reason for any of these customers leaving Citizens in the last year? Explain.

Response) None of the customers that disconnected service identified any of these matters listed in 1-2 as a reason for their disconnection.

- 1-4. Is there a service technician in the Jasper area? If not, how close is the nearest technician to the South Dakota portion of the Jasper exchange? Does Citizens feel this is close enough to reliably serve its South Dakota customers?

Response) Citizens' Ghent, Minnesota reporting location covers the South Dakota portion of the Jasper exchange. It is roughly 60 miles from Ghent to Jasper. Citizens believes that its current technician arrangements are sufficient to serve the needs of its South Dakota customers.

- 1-5. If a settlement is reached (or a resolution is ordered) in Minnesota PUC docket 18-122 that results in benefits to Citizens' Minnesota customers, does Citizens plan to provide its South Dakota customers with the same level of benefits?

Response) It is premature at this point to speculate on the particulars of any settlement that may be reached, or what any MN PUC order might include. From an operational standpoint, Citizens' Minnesota and South Dakota service areas are managed as a unit.

- 1-6. If the one-year waiver is granted, would Citizens be willing to submit a verification of the certification from the Minnesota Public Utilities Commission as soon as a decision is made on Citizens' certification in Minnesota?

Response) Citizens will provide a copy of the Minnesota Public Utilities Commission ETC designation when it is available.