



2378 Wilshire Blvd.  
Mound, MN 55364

Filed Electronically

June 24, 2020

Ms. Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
Capitol Building – 1<sup>st</sup> floor  
500 East Capitol Avenue  
Pierre, South Dakota 57501-5070

Dear Ms. Van Gerpen:

Citizens Telecommunications Company of Minnesota, LLC, (CTC MN) respectfully files for a waiver of the Commission's ETC filing requirements pursuant to ARSD 20:10:32:56, on the grounds that the reporting requirements in support of ETC certification are unduly burdensome and unnecessary. CTC MN also requests the Commission to certify CTC MN as an ETC in its annual ETC certification.

Under the FCC's rules at 47 CFR § 54.314, Certification of support for eligible telecommunications carriers:

(b) Carriers not subject to State jurisdiction. An eligible telecommunications carrier not subject to the jurisdiction of a State that desires to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carrier was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Support provided pursuant to the high-cost program shall only be provided to the extent that the carrier has filed the requisite certification pursuant to this section.

A portion of CTC MN's Jasper, Minnesota exchange extends into South Dakota and serves 19 access lines in South Dakota. The Jasper exchange central office switch is located in Minnesota and the study area is under Minnesota jurisdiction.

Based on the above regulation, because the study area is subject to Minnesota jurisdiction, it is at least arguable that CTC MN could self-certify to the Administrator (the Universal Service Administrative Company) and the FCC. However, out of an abundance of caution, CTC MN hereby requests certification from the South Dakota PUC for our 19 access lines in South Dakota.

Completing a full ETC certification filing for South Dakota would be unduly burdensome because less than .01% of the CTC MN customer's base is South Dakota residents. The switches and vast majority of outside plant that supports the South Dakota customers are located within Minnesota. It is burdensome to extrapolate specific costs and projects specific to South Dakota customers.

Therefore, CTC MN is requesting a permanent waiver of the ETC filing requirements, pursuant to ARSD 20:10:32:56.

CTC MN is attaching an affidavit stating that its federal high-cost support was used in 2019 and will be used in 2021 only for the provision, maintenance and upgrading of facilities and services for which such support is intended. During 2019, CTC MN did not have any construction projects in its South Dakota service territory. Currently, CTC MN has no held orders for either voice service or broadband service in South Dakota.

CTC MN has been designated as an Eligible Telecommunications Carrier ("ETC") by the Commission in the past and requests the Commission include CTC MN in its certification to the Universal Service Administrative Company and the Federal Communications Commission.

If there are any questions, please call me at (952) 491-5534 or (612) 562-7183.

Sincerely,

A handwritten signature in black ink that reads "Scott Bohler". The signature is written in a cursive, slightly stylized font.

Scott Bohler  
Manager, Government and External Affairs  
Frontier Communications

Attachment