
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE
APPLICATION OF LTD BROADBAND
LLC FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER FOR PURPOSES OF
RECEIVING FEDERAL UNIVERSAL
SERVICE SUPPORT

Discovery Request #5

Docket No. TC21-001

**DISCOVERY REQUEST #5 OF SOUTH DAKOTA TELECOMMUNICATIONS
ASSOCIATION (SDTA) TO LTD BROADBAND, LLC**

The South Dakota Telecommunications Association (“SDTA”) hereby serves its Discovery Requests on LTD Broadband, LLC. Unless otherwise noted in a specific request, the Discovery Requests are directed to LTD Broadband, LLC specifically, and its responses should be provided, as appropriate.

You are requested and required to answer fully and under oath, pursuant to S.D. Admin. R. 20:10:01:22.01, each of the following Discovery Requests and serve a copy of your answers and responses thereto upon Kara Semmler, General Counsel for SDTA, on or before September 27, 2021. Please be advised that your answers must include all information available not only to you, but to your agents, officers, representatives, employees, attorneys, insurers, or others who have information available to you upon inquiry to them.

DEFINITIONS

As used herein, the following terms have the meaning as set forth below:

1. The term “you” refers to “LTD Broadband, LLC” or “LTD” (as the company may be referenced in abbreviated fashion).
2. The term “the Act” shall refer to the Communications Act of 1934, as amended by the Telecommunications Act of 1996, codified at 47 U.S.C. §§ 151 *et seq.*
3. The terms “document” or “documents” as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and

concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received, and other written or electronic records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that: (a) are now or were formerly in your possession, custody or control; or (b) are known or believed to be responsive to these interrogatories, regardless of who has or formerly had custody, possession or control.

4. The term “including” means “including, but not limited to.”
5. “Affiliate” means a person or entity that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this definition, “own” means to own an equity interest (or the equivalent thereof) of more than five (5) percent.

INSTRUCTIONS

1. If you maintain that any document or record that would be responsive to any of the data requests has been destroyed, set forth the content of said document, the location of any copies of said document, the date and circumstances of said destruction, and the name of the person who ordered or authorized such destruction.
2. In answering these data requests, furnish all responsive documents in your possession or in the possession of any of your directors, officers, employees, agents, representatives, or attorneys.
3. If you cannot answer a data request in full after exercising due diligence to secure all the information requested or does not have precise information with regard to any part of a data request, so state in the response, describing in full the efforts to obtain the information requested, and then proceed to respond to the fullest extent possible. If an objection is made to any part of a data request, answer all parts of the data request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

4. If a responsive document is considered to contain confidential, proprietary, or otherwise protected information, please furnish this document subject to a protective agreement.
5. If any information is withheld under a claim of privilege, please describe the information without revealing the asserted privileged information, and provide a statement of the basis upon which the claim of privilege is based.
6. If any of the information requested by a data request varies over time, state the response for each period of time as to which the response differs, and identify the time periods.
7. These interrogatories and requests are considered continuing and should be supplemented as additional information becomes available.

INTERROGATORIES AND REQUESTS FOR PRODUCTION

REQUEST 5-1: Regarding LTD's experience with Fiber to the Premises (FTTP) networks:

- a. What is the largest Fiber to the Premises (FTTP) network that LTD has deployed in terms of numbers of customers currently being served by fiber?
- b. What technology does this FTTP network use? (GPON, EPON, etc.)
- c. Where is this FTTP network located?

REQUEST 5-2: How many locations is LTD currently able to serve with its deployed FTTP systems (mainline fiber within 500 feet of location)?

REQUEST 5-3: Describe the experience LTD has in obtaining federal and tribal permits as part of a fiber installation project.

REQUEST 5-4: How many miles of fiber construction planned by LTD in South Dakota will be aerial? Buried?

REQUEST 5-5: How many bucket trucks does LTD currently have for maintenance of aerial fiber cable? Or how does LTD intend to maintain aerial fiber?

REQUEST 5-6: Provide an Organizational Chart of LTD's Management Team.

REQUEST 5-7: Provide the resume of the licensed professional engineer (Roy Glenn) showing his experience engineering broadband networks similar to what is planned for South Dakota.

REQUEST 5-8: Provide Roy Glenn's professional engineering license number for the state of South Dakota.

REQUEST 5-9: Provide all quality-of-service filings against LTD to any state utility commission in last 5 years.

REQUEST 5-10: Provide outage reports for the last 5 years.

REQUEST 5-11: Provide a list of customer complaints for the last 2 years.

REQUEST 5-12: How many total mainline miles of fiber cable does LTD plan to install in South Dakota?

REQUEST 5-13: How many FTTP subscribers will be supported over each fixed microwave middle-mile link?

REQUEST 5-14: With regard to any wireless links planned for the middle mile network:

- a. What is the maximum distance LTD is proposing for these links?
- b. What frequency band will be used?
- c. What channel bandwidths will be used?
- d. What are the planned oversubscription ratios for these links?
- e. Does LTD plan to construct new towers? If so, how many?
- f. Will outdoor units or split systems be utilized?

REQUEST 5-15: Describe the diverse routing and redundancy of the middle mile network (wireless and fiber).

REQUEST 5-16: Describe the redundancy planned for the Core network and Internet Connection Point.

REQUEST 5-17: How will the broadband traffic be backhauled from the various RDOF areas to the Internet Connection Point in Sioux Falls.

REQUEST 5-18: How many customers does LTD anticipate in South Dakota 3 years after FCC award?

REQUEST 5-19: How much investment will LTD have made in South Dakota 3 years after FCC award?

REQUEST 5-20: Describe how the broadband investments in South Dakota be financed.

DATED this 27 day of August, 2021.

A handwritten signature in black ink that reads "Kara Semmler". The signature is fluid and cursive, with the first name "Kara" and last name "Semmler" clearly distinguishable.

Kara Semmler
General Counsel
South Dakota Telecommunications Assn.
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