

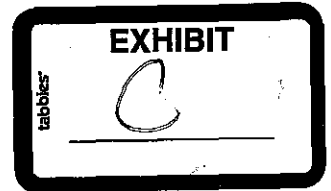
Jason R. Sutton

From: karasemmler@sdaonline.com
Sent: Wednesday, May 5, 2021 4:47 PM
To: 'Brett Heather Freedson'; Jason R. Sutton; 'Reiss, Amanda'
Cc: 'Mehlhoff, Brittany'
Subject: LTD pending dockets with the SD PUC

All,

Thank you for your patience in allowing me the time to discuss the two pending LTD dockets with the SDTA Board. SDTA's position is as follows:

Settlement Discussions
Redacted



- 2) 21-014 COA Docket.
 - a. SDTA's interest is resolved by the stipulation language that pertains to this docket. (If language is added to identify LTD will not serve in rate of return rural area absent additional PUC action).
 - b. SDTA is willing to sign a stipulation in the COA docket to fully resolve SDTA's interest in this docket.

After receipt of LTD's second discovery production, I agree to revisit the position I took in response to LTD's first discovery objections.

For example:

SDTA's first discovery, Requests #10 – 13 were an attempt to understand whether LTD considered all the variables in SD that create a high cost, low rate of return environment. I intended the second discovery, Request # 1 to target the same type of information in a more "generic" or "narrative" way. Brett, as I expressed on the phone last week, SDTA is simply concerned that LTD does not have experience in providing service in the types of areas that it committed to build in SD. As a result, SDTA questions whether LTD is fully informed regarding the cost to serve. I think the issue can be resolved (without getting into the confidential RDOF bidding process and decisions LTD made) if you are able to explain the research and development process LTD engaged. Can LTD explain what it did to fully understand what the heck it is getting into? We are not able to rely on LTD's past performance....there is nothing in Minnesota like the Black Hills of western SD!

Reliability is the other area of particular concern. Is LTD able to diagram or otherwise describe how it provides service in a way that its telecom service is reliable? How does LTD prevent interruption to phone service every time we experience a blizzard?

Thank you for engaging in the conversation. What clarity can I provide regarding SDTA's position? I think the moral of the story is: if SDTA believes LTD is in compliance with the SD ETC rules and regulations, that LTD it will offer reliable

telecommunications service and that it fully studied and accounted for the unique high-cost characteristics of rural SD service then SDTA does not intend to object to LTD's ETC designation or ask for an evidentiary hearing.

Kara



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