



South Dakota Telecommunications Association

Advocating for South Dakota's Rural Broadband Providers

August 18, 2021

Brett Heather Freedson, [BFreedson@lermansenter.com](mailto:BFreedson@lermansenter.com)  
Jason Sutton, [jrsutton@boycelaw.com](mailto:jrsutton@boycelaw.com)

Re: Docket TC21-001 - 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

Dear Brett and Jason,

Thank you for providing a portion of LTD's RDOF application. After expert review, SDTA determined it must pursue the following previously requested discovery:

- 1) SDTA Request 1, #1: LTD asserted in discovery answers to Staff, that it provided a link to the entire RDOF application. SDTA requested a copy. LTD objected. The information included in the RDOF application is relevant and SDTA requests the entire RDOF application and updates as filed with the FCC.

The financial analysis required in the RDOF application is relevant to this proceeding. SDTA questions whether LTD properly and completely assessed the cost to build the infrastructure it proposes. The credibility of LTD's financial plan impacts whether it is in the public interest for LTD to receive ETC certification in South Dakota.

- 2) SDTA Request 1, #10 - 13: In addition to construction costs, operational costs must be properly assessed. If costs are not properly determined, the provider cannot find success. A failed attempt at serving SD consumers is not in the public interest. To the extent information responsive to SDTA Request 1, #10 - 13 is not included in the RDOF application, SDTA requests LTD respond.

I am available to meet and discuss the above requests on the following days:

- August 25 - after noon
- August 26 - any time
- August 27 - after noon
- August 30, 31 - any time

Sincerely,

Kara Semmler

SDTA Executive Director and General Counsel

cc. Amanda Reiss, Brittany Mehlhaff - via email.

