

**MATTER OF APPLICATION LTD BROADBAND LLC
DOCKET NO. TC-001**

**Responses of LTD Broadband LLC to
Second Discovery Requests of South Dakota Telecommunications Association (SDTA)**

Request 1: Describe what due diligence/investigation/research was done by LTD prior to bidding on the South Dakota RDOF areas to learn about the geography and the potential customers. Provide any documents LTD generated during such activities.

(a) How the due diligence/investigation/research impact the price LTD bid for South Dakota areas in the RDOF auction and the technical means by which it intends to offer service in South Dakota?

Response: Prior to the submission of its bid in the RDOF auction, LTD Broadband carefully examined the unique characteristics of South Dakota's unserved areas, which examination included, but was not limited to the physical aspects of South Dakota's landscape, and the statistical characteristics of South Dakota's population, and LTD Broadband's prospective customer base within the state. The extensive research conducted by LTD Broadband was used as a basis for its technical plans and RDOF bid.

Date: May 13, 2021

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Request 2: Is it correct that a phone subscriber must have internet access? Therefore, the \$25/\$30 phone service explained on page 4 of LTD's application is a charge in addition to internet cost.

Response: No. An internet subscription is not required to receive voice service.

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Request 3: See LTD response to SDTA first discovery request #15. Specifically describe the service plans (speeds) and prices that LTD plans to offer consumers in its South Dakota RDOF area.

(a) Will the plans and prices offered be identical in all SD RDOF areas?

Response: As provided in response to SDTA's First Discovery Requests, #15, LTD Broadband currently intends to offer to South Dakota consumers a service plan of 1 Gbps/500 Mbps speeds, at a cost that does not exceed the maximum monthly rate prescribed by the FCC. LTD Broadband will add RDOF service plans to its website when such plans become available to consumers, but at the present time, such information about LTD Broadband's service plans remains confidential and proprietary, is commercially sensitive, and constitutes trade secret. LTD Broadband has not yet determined whether the identical service plans and prices will be available in all service areas for which it has obtained RDOF funds.

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Request 4: If LTD receives RDOF funds from the FCC, will its service offerings in its South Dakota non-RDOF footprint change? If so, explain how?

Response: LTD Broadband is unable to predict whether, or how the services that it provides within its non-RDOF footprint will be impacted by an award of RDOF funds.

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Request 5: See LTD response to SDTA first discovery request #5(f).

- (a) When did LTD become capable of providing gigabyte capacity?
- (b) Describe the “newly deployed” equipment that made the new service offering possible.
- (c) When did the single South Dakota 1 Gbps commercial customer enter into a contract to receive said service?

Response:

- (a) LTD Broadband has been able to provide symmetrical 1 Gbps service since 2019.
- (b) LTD Broadband objects to this request because (i) the information requested is not relevant to the Commission’s review of LTD Broadband’s Application, pursuant to 47 U.S.C. § 214(e) and SD Codified L § 49-31-78; (ii) the information requested by SDTA has been filed with the FCC as part of LTD Broadband’s RDOF application, and will be reviewed extensively by the FCC, and evaluated in connection with LTD Broadband’s bid for RDOF funds; and (iii) the information requested by SDTA is confidential and proprietary, is commercially sensitive, and constitutes trade secret.
- (c) LTD Broadband started to provide symmetrical 1 Gbps service to one commercial customer in 2019.

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Request 6: Questions related to ARSD 20:10:32:43.01.

- (a) What is LTD's timeline to provide service to a requesting customer within LTD's designated service area after RDOF facilities are constructed?
- (b) How will LTD handle a request for service from an individual within LTD's RDOF service area, but outside of the completed RDOF constructed area? Specify what information will be provided to an individual regarding the time it will take LTD to provider service pursuant to the request.
- (c) Provide any company documents, policies or customer information that supports answers given to the above questions.

Response:

- (a) After LTD Broadband's network within its RDOF service areas is fully deployed, LTD Broadband will provide service to a customer within ten (10) days of the customer's request.
- (b) LTD Broadband is required to complete construction of its network within the RDOF service areas no more than six (6) years after its RDOF funds are awarded. While LTD Broadband is not required to provide service to *any* customer, it plans to provide reasonable updates to prospective customers about the availability of service, upon request.
- (c) LTD Broadband has no responsive documents, policies, or customer information that it is able to supply at this time.

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Request 7: Question related to ARSD 20:10:32:43.02.

- a. Specify what construction progress or activity LTD intends to engage in within 2 years if the FCC approves LTD's long form.
- b. Provide a detailed timeline beyond the 2-year plan regarding each buildout phase through RDOF construction completion in South Dakota.

Response: As indicated in response to Request #6 above, LTD Broadband is required to complete the construction of its network within the RDOF service areas no more than six (6) years after its RDOF funds are awarded. The information requested by SDTA, as it relates to the timeline for construction of LTD Broadband's network within the RDOF service areas, has been filed with the FCC as part of LTD Broadband's RDOF application, and will be reviewed extensively by the FCC, and evaluated in connection with LTD Broadband's bid for RDOF funds. Additionally, LTD Broadband objects to this request because the information requested by SDTA is confidential and proprietary, is commercially sensitive, and constitutes trade secret.

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Request 8: Questions related to ARSD 20:10:23:43.03.

- (a) Describe what “back-up power” LTD intends to use and explain why that plan is reasonable.
- (b) Provide a copy of the instructions LTD will provide customers on the use of emergency services. (See reference to instructions on page 11 of Application.)
- (c) What third party 911 provider will LTD use for South Dakota. (See reference to third party 911 provider on page 12 of the Application.)

Response:

- (a) As required by the Commission’s rules, LTD Broadband will maintain a reasonable amount of back-up power to ensure that its network remains functional without the need for any external power source. To that end, LTD Broadband will size its battery arrays at customer premises and at network distribution points, to comply with the requirements of the FCC’s RDOF rules. The details of LTD Broadband’s back-up power capabilities are included in its RDOF application, as filed with the FCC.
- (b) As required by the Commission’s rules, LTD Broadband will be able to reroute traffic around damaged transport facilities, and to manage traffic spikes in emergency situations. While it is unclear what “instructions” are referred to in SDTA’s Request, calls placed by a customer to 911 will be routed by LTD Broadband to emergency services.
- (c) LTD Broadband’s E911 services will be provided by Inteliquent.

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Request 9: Question regarding ARSD 20:10:23:43.04 - Planning for adequate personnel to respond to network and customer service problems.

- (a) How many individuals were employed by LTD to serve its customer base prior to LTD's participation in the RDOF auction? Provide the total numbers of employees by department and/or job duties (For example: customer service, billing, technicians, etc.).
- (b) Prior to LTD's participation in the RDOF auction, did it have a physical office location? If so, provide the address.
- (c) If applicable: Did any of the listed employees in (a) work out of the office names in (b)?
- (d) If RDOF funds are received, will LTD have physical office locations? If so:
 - (i) Specify where, with as much detail as available, where the office facilities are (or will be) located?
 - (ii) Will the office locations be open to the public with customer service representatives available to interface with customers?
- (e) If RDOF funds are received in all areas nationwide that LTD intends to serve: what are LTD's employee/staffing plans? Specifically, include the following:
 - (i) Will LTD have employees dedicated to the South Dakota customer base? If so, provide the number of South Dakota dedicated employees you intend to hire and describe their role (technical/customer service). Include information regarding where the above employees will be located.
 - (ii) If LTD does not intend to have employees dedicated to the South Dakota customer base: describe the total number of employees LTD plans to hire, the employee role and where they will be located. Specify where technicians will be located, how many technicians will be employed and generally how long a customer can expect to wait for help from an onsite technician if needed.

Response:

- (a) At the present time, LTD maintains approximately 147 employees, all of whom are cross-trained to perform multiple functions within the company.
- (b) LTD Broadband's physical office address is 310 West 7th Street, St. Albert Lea, MN 56007.
- (c) At the present time, the employees indicated in response to Request #9(a) do not work in LTD Broadband's physical office.

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Response (cont.):

- (d) LTD Broadband currently maintains an operations facility in Watertown. If LTD Broadband is awarded RDOF funds for South Dakota, it plans to maintain operations facilities in McLaughlin, Rapid City, and Rosebud, in addition to Watertown. LTD Broadband does not plan to interface with customers at its South Dakota operations facilities.
- (e) If LTD Broadband is awarded RDOF funds for South Dakota, it will maintain employees dedicated to its South Dakota customer base.

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Request 10: Has notice been provided as is required by ARSD 20:10:32:46?

Response: LTD Broadband has complied with ARSD 20:10:32:46. Out of an abundance of caution, service was made to all ILECs and CLECs identified on the Commission's website on May 12, 2021.

Date: May 13, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

In the Matter of)	
)	
Application of LTD Broadband LLC for)	
Designation as an Eligible)	Docket No. TC21-001
Telecommunications Carrier (ETC) for)	
Purposes of Receiving Federal Universal)	
Service Support.)	

CERTIFICATE OF SERVICE

I, Brett Heather Freedson, hereby certify that true and correct copies of LTD Broadband’s responses to the Second Discovery requests of the South Dakota Telecommunications Association (SDTA) were served electronically to the Parties listed below, on this 13th day of May, 2021:

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/s/ Brett Heather Freedson

Brett Heather Freedson