

**MATTER OF APPLICATION OF LTD BROADBAND LLC
DOCKET NO. TC21-001**

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

Request 1: When it is available, provide a copy of LTD's response to the July 26, 2021, letter from the FCC directing LTD's review of identified census blocks that may already be served by one or more service providers or otherwise raise concerns about wasteful spending.

Response: LTD Broadband is not required to respond to the letter referenced in SDTA’s Request, unless it intends to relinquish census blocks for which it was presumptively awarded RDOF funds. LTD Broadband has not made a final determination with respect to whether, and to what extent it will relinquish census blocks at this time.

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Request 2: Identify (i) the number of census blocks and (ii) total RDOF funds LTD lost because of the FCC's denial of LTD's request to waive the state ETC designation deadline in California, Kansas, and Oklahoma.

Response: The information requested by SDTA is not relevant to LTD Broadband’s Application, or the ability of LTD Broadband to construct and operate its network within South Dakota, or to provide broadband internet access and voice services to South Dakota consumers. If SDTA seeks to review this information irrespective of its relevance to South Dakota, it is publicly available. Per the FCC’s December 7, 2020 auction results, LTD Broadband’s presumptive RDOF awards were as follows:

STATE	RDOF AWARD (\$)	LOCATIONS
California	\$187,506,059.70	76,856
Kansas	\$3,228,948.00	2,122
Oklahoma	\$81,098,352.90	39,889

LTD Broadband intends to seek reconsideration of the FCC’s order that denied, in part, its waiver request.

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Request 3: Does the loss of California, Kansas, Oklahoma, and any additional blocks that result from FCC's July 26 correspondence impact LTD's financial ability to build and maintain a network across very high-cost areas in South Dakota? If so, explain how. If not, explain why not.

Response: No. At this time, LTD Broadband does not anticipate that its inability to receive RDOF funds for census blocks in California, Kansas, and Oklahoma will impact its ability to construct a network across any portion of South Dakota for which it was presumptively awarded RDOF funds.

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Request 4: In Docket, TC21-014, Staff Data Request 1.4, LTD indicated it does not intend to provide any Fiber-to-the Home or Fiber-to-the-Premises to retail customers in South Dakota, except to the extent that such retail customers constitute “locations,” as defined and determined by the FCC. What is meant by “*except to the extent that such retail customers constitute locations as defined and determined by the FCC*”?

Response: The FCC defines “locations” pursuant to guidance in its Public Notice dated December 8, 2016 (link here): [DA-16-1363A1.pdf](#) The obligation to deploy facilities and services is limited to the “locations” that the FCC will recognize.

Date: August 6, 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 LLC's responses to SDTA's Fourth Discovery Requests were served electronically to the Parties listed below, on this 6th day of August, 2021:

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/s/ Brett Heather Freedson

Brett Heather Freedson