

**MATTER OF APPLICATION OF LTD BROADBAND LLC
Docket No. TC21-001**

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

Request 1: Provide a copy to SDTA of all discovery responses and documents LTD provided to Commission Staff in response to Commission Staff's First Data Request or any follow up thereafter.

Response: A copy of LTD Broadband's response to Commission Staff's First Data Request is appended hereto as Exhibit 1. LTD Broadband's specific responses to Commission Staff's Requests 1-4, 1-7, and 1-11 have been provided to the Commission subject a request for confidential treatment, pursuant to S.D. Admin. R. 20:10:1:41, and therefore, are omitted from the materials included in Exhibit 1.

Date: April 9, 2021

EXHIBIT L-9

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Request 2: Other than the RDOF auction, has LTD received any federal funds, from any federal grant or finance program for infrastructure construction or to offer services in any state? If so, specify:

- (a) The state in which the funds were used.
- (b) The program name.
- (c) Funds received and whether a grant or loan.

Response:

- (a) LTD Broadband was awarded federal funds to provide fixed broadband and voice services within Illinois, Iowa, and Minnesota.
- (b) Connect America Fund (CAF) Phase II
- (c) The funds received by LTD Broadband were provided as a subsidy, as follows:

STATE	FUNDS AWARDED
Illinois	\$ 19,462.20
Iowa	\$ 69,516.40
Minnesota	\$ 1,104,440.80

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Request 3: Currently, how many residential customers does LTD have in South Dakota?

Response: Currently, LTD Broadband serves 259 residential customers in South Dakota.

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Request 4: LTD's FCC Form 477 indicates that it provides 250 Mbps per second upload and 250 Mbps download speeds throughout 100% of its current South Dakota service area.

- (a) Can all customers, throughout LTD's entire South Dakota service area receive 250/250 Mbps service? If not, what percentage of the service area can receive 250/250 Mbps service?
- (b) How many LTD residential customers currently receive 250/250 Mbps service?
- (c) How many commercial customers in South Dakota currently receive 250/250 Mbps service?
- (d) What is the monthly cost to the customer to receive 250/250 Mbps service?
- (e) Why isn't this speed listed on LTD's website as an available package?
- (f) Is the customer, who desires 250/250 Mbps service, required to purchase any additional equipment? If so, what is the cost of the equipment.

Response:

- (a) Yes.
- (b) No residential customers currently subscribe to LTD Broadband's 250/250 Mbps service plan.
- (c) One commercial customer currently subscribes to a service plan that provides equal to, or greater than 250 Mbps upload and 250 Mbps download speeds.
- (d) LTD Broadband offers 250/250 Mbps service on an individual contract basis ("ICB"). Each customer's monthly cost is specified in a written contract for services, and may vary based on the totality of the services and amenities to which the customer subscribes.
- (e) As of March 30, 2021, all service plans that exceed 35/35 Mbps are provided ICB.
- (f) No.

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Request 5: LTD alleges it currently offers symmetrical 1 Gbps service to "most of its service area." (See response to Staff Data Request 4). Can LTD currently provide this speed of service in in South Dakota? If so:

- (a) Does LTD offer 1 Gbps service to South Dakota consumers?
- (b) Is this speed available throughout LTD's entire South Dakota service area?
- (c) If not, what percentage of LTD' s South Dakota service area can receive this speed?
- (d) How many South Dakota residential customers currently receive this service?
- (e) How many South Dakota commercial customers currently receive this service?
- (f) Why didn't LTD reflect its symmetrical 1 Gbps capabilities on its FCC Form 477 filing?
- (g) What is the monthly cost to the consumer to receive symmetrical 1 Gbps service?
- (h) Is the consumer required to purchase any equipment to receive this service? If so, specify the equipment and cost.

Response:

- (a) While LTD Broadband current does not provide symmetrical 1 Gbps service to any consumer in South Dakota, it is able to deploy such service within 60 days, upon request, to all areas within its service footprint.
- (b) Yes.
- (c) LTD Broadband currently is able to provide symmetrical 1 Gbps service to customers within 100% of its service footprint, upon request.
- (d) LTD Broadband currently does not provide symmetrical 1 Gbps service to any residential customer in South Dakota.
- (e) LTD Broadband currently provides symmetrical 1 Gbps service to one commercial customer in South Dakota.
- (f) LTD Broadband's FCC Form 477, filed March 1, 2021, provides information current as of December 31, 2020. Information about LTD's Broadband's newly deployed equipment, and associated gigabit capability, will be included in LTD Broadband's FCC Form 477 to be filed by September 1, 2021.

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Request 5: LTD alleges it currently offers symmetrical 1 Gbps service to "most of its service area." (See response to Staff Data Request 4). Can LTD currently provide this speed of service in in South Dakota? If so:

- (a) Does LTD offer 1 Gbps service to South Dakota consumers?
- (b) Is this speed available throughout LTD's entire South Dakota service area?
- (c) If not, what percentage of LTD' s South Dakota service area can receive this speed?
- (d) How many South Dakota residential customers currently receive this service?
- (e) How many South Dakota commercial customers currently receive this service?
- (f) Why didn't LTD reflect its symmetrical 1 Gbps capabilities on its FCC Form 477 filing?
- (g) What is the monthly cost to the consumer to receive symmetrical 1 Gbps service?
- (h) Is the consumer required to purchase any equipment to receive this service? If so, specify the equipment and cost.

Response (continued):

- (g) Within the areas of LTD Broadband's service footprint for which RDOF funds were awarded, symmetrical 1 Gbps service will be made available at a cost of \$140.00 per month.
- (h) No.

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Request 6: Does the consumer's proximity to the LTD tower impact the product LTD can provide the consumer? Explain how.

Response: No. LTD Broadband's GPON deployment will be engineered to support at least 1 Gbps/500 Mbps service to all locations within each census block group for which RDOF funds were awarded.

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Request 7: When LTD's network is built pursuant to its RDOF bid, will all customers throughout the entire service area have access to the same service offerings? If not, explain.

Response: Yes.

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Request 8: How many commercial customers does LTD have in South Dakota?

- (a) How many LTD commercial customers in South Dakota currently receive 10 Gbps service?
- (b) How many LTD commercial customers in any state receive 10 Gbps service?

Response: LTD Broadband currently provides service to 19 commercial customers within South Dakota.

- (a) At the present time, LTD Broadband does not provide 10 Gbps service to any customer in South Dakota.
- (b) LTD Broadband currently provides 10 Gbps service to two commercial customers.

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Request 9: Has LTD filed its letter of credit commitment letter with the FCC? At this time, what is the value of the letter of credit that LTD must obtain for the South Dakota portion of its RDOF bid?

Response: Yes. At this time, the value of the letter of credit that LTD Broadband must obtain for the South Dakota portion of its RDOF bid is \$4,658,845.38.

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Request 10: What is the expected cost to build the network, in South Dakota, that will perform according to LTD's RDOF bid?

Response: LTD Broadband objects to SDTA's Request 10 because the information requested by SDTA 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. The Communications Act provides that a state commission *shall* designate an entity as an ETC for a requested service area if, with respect to that service area, the entity (i) is a common carrier; (ii) offers the services that are supported by Federal universal service support mechanisms under 47 U.S.C. § 254; and (iii) advertise the availability of such services. While the Commission may be permitted to impose further requirements where the public interest so demands, no such requirements exist under the Commission's rules. The cost of LTD Broadband's network construction in South Dakota does not bear on LTD Broadband's status as a common carrier, and is not needed to identify the services LTD will provide in South Dakota, or the manner in which those services will be advertised.

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Responses of LTD Broadband, LLC to
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Request 11: What is the expected cost per location to build the network, in South Dakota, that will perform according to LTD's RDOF bid?

Response: LTD Broadband objects to SDTA's Request 11 because the information requested by SDTA 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. The Communications Act provides that a state commission *shall* designate an entity as an ETC for a requested service area if, with respect to that service area, the entity (i) is a common carrier; (ii) offers the services that are supported by Federal universal service support mechanisms under 47 U.S.C. § 254; and (iii) advertise the availability of such services. While the Commission may be permitted to impose further requirements where the public interest so demands, no such requirements exist under the Commission's rules. The cost of LTD Broadband's network construction in South Dakota does not bear on LTD Broadband's status as a common carrier, and is not needed to identify the services LTD will provide in South Dakota, or the manner in which those services will be advertised.

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Request 12: What is the expected cost to maintain the network, in South Dakota, that will perform according to LTD's RDOF bid?

Response: LTD Broadband objects to SDTA's Request 12 because the information requested by SDTA 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. The Communications Act provides that a state commission *shall* designate an entity as an ETC for a requested service area if, with respect to that service area, the entity (i) is a common carrier; (ii) offers the services that are supported by Federal universal service support mechanisms under 47 U.S.C. § 254; and (iii) advertise the availability of such services. While the Commission may be permitted to impose further requirements where the public interest so demands, no such requirements exist under the Commission's rules. The cost of LTD Broadband's network maintenance in South Dakota does not bear on LTD Broadband's status as a common carrier, and is not needed to identify the services LTD will provide in South Dakota, or the manner in which those services will be advertised.

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Request 13: What is the expected cost per location to maintain the network, in South Dakota, that will perform according to LTD's RDOF bid?

Response: LTD Broadband objects to SDTA's Request 13 because the information requested by SDTA 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. The Communications Act provides that a state commission *shall* designate an entity as an ETC for a requested service area if, with respect to that service area, the entity (i) is a common carrier; (ii) offers the services that are supported by Federal universal service support mechanisms under 47 U.S.C. § 254; and (iii) advertise the availability of such services. While the Commission may be permitted to impose further requirements where the public interest so demands, no such requirements exist under the Commission's rules. The cost of LTD Broadband's network maintenance in South Dakota does not bear on LTD Broadband's status as a common carrier, and is not needed to identify the services LTD will provide in South Dakota, or the manner in which those services will be advertised.

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Request 14: When the RDOF network is built, what will the monthly cost to the South Dakota consumer be, to receive symmetrical 1 gigabyte service?

(a) What will the initial costs to the consumer be, including equipment purchases?

Response: Within the areas of LTD Broadband's service footprint for which RDOF funds were awarded, symmetrical 1 Gbps service will be made available at a cost of \$140.00 per month.

(a) No initial costs will be imposed on consumers that subscribe to LTD Broadband's symmetrical 1 Gbps service.

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Request 15: When RDOF services are available to South Dakota customers, will LTD add to the service plans currently advertised on its website? If so, specify the plan speed, monthly consumer cost and installation cost.

Response: 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.

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VERIFICATION

I, Corey Hauer, am the CEO for LTD Broadband LLC (“LTD Broadband”), and I hereby state that the facts set forth in the foregoing responses of LTD Broadband to the discovery requests of SDTA are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made under oath, and subject to the penalty of perjury.



Corey Hauer
CEO, LTD Broadband LLC

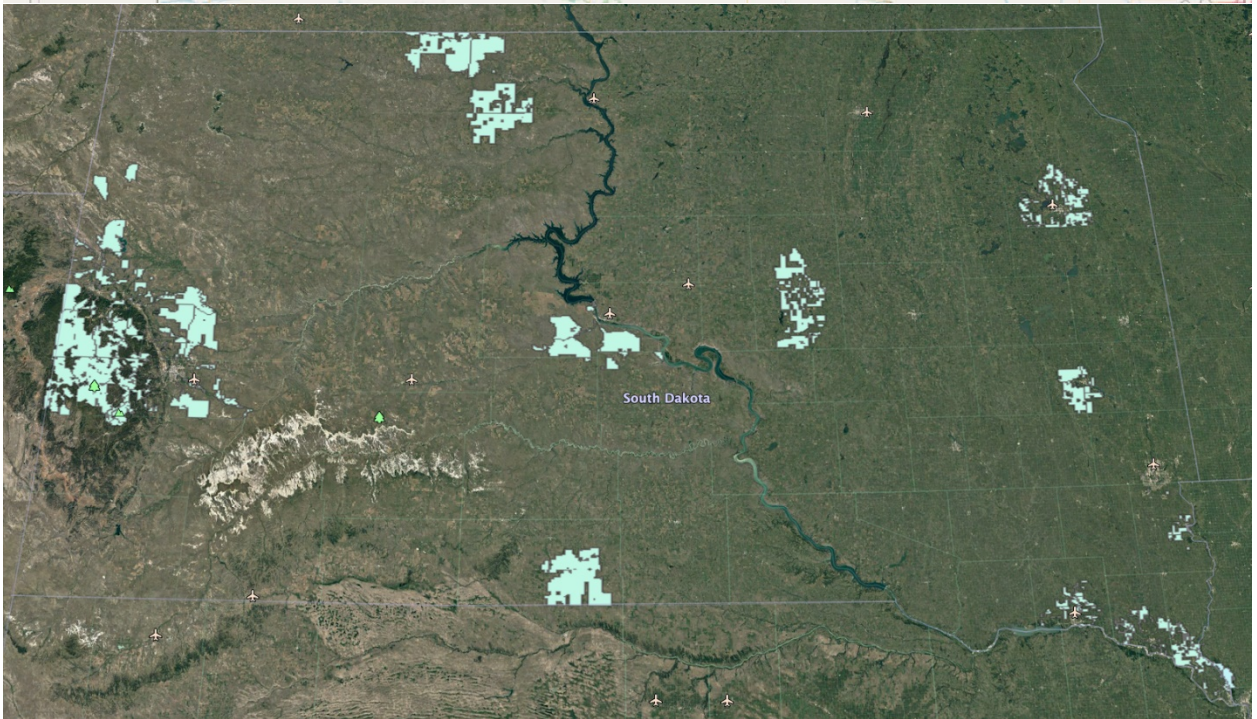
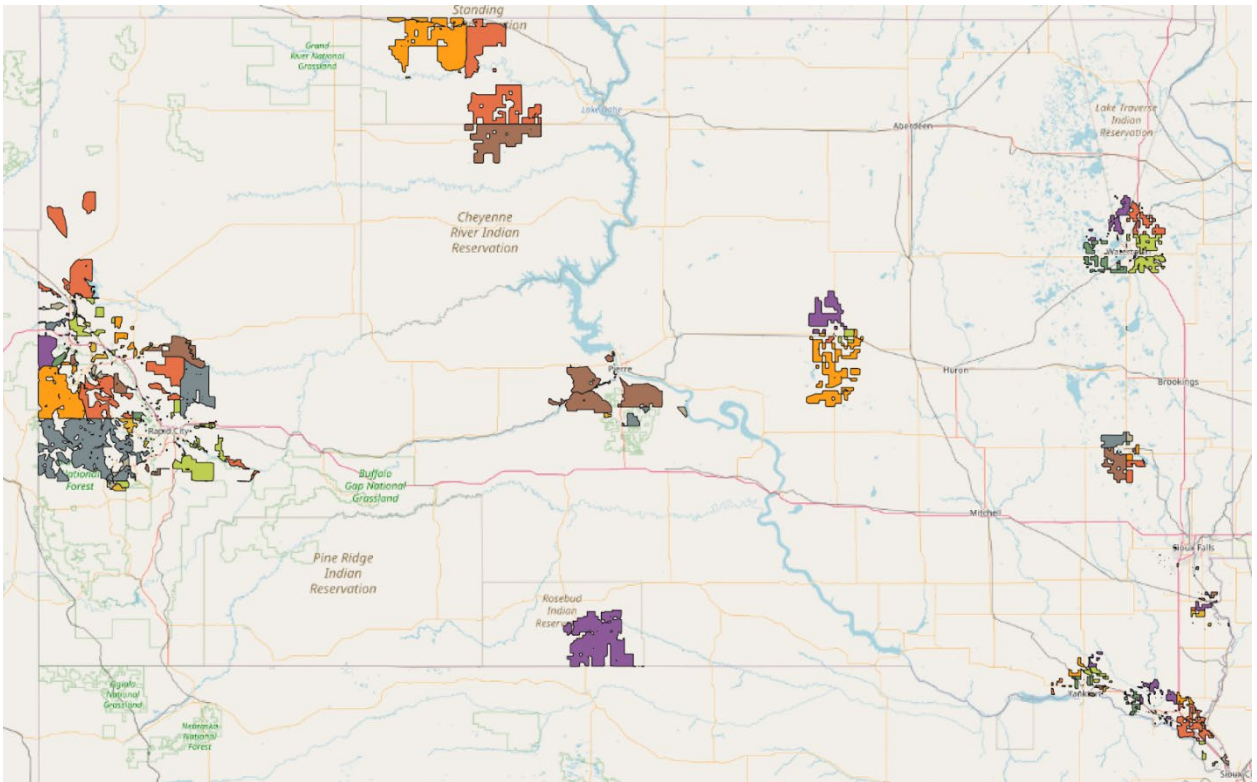
Date: April 9, 2021

Docket Number: TC21-001
Subject Matter: First Data Request
Request to: LTD Broadband (LTD Broadband or Company)
Request from: South Dakota Public Utilities Commission Staff
Date of Request: January 28, 2021
Responses Due: February 11, 2021

Please indicate the LTD Broadband representative, including contact info, responsible for each response.

All responses below may be attributed to Corey Hauer, President of LTD Broadband, coreyhauer@ltdbroadband.com, 507 369-6669.

1. Pursuant to ARSD 20:10:32:43(3), provide a detailed map identifying the service area for which ETC designation is sought. Such map should identify the census blocks awarded. Please identify each census block located in a rural service area.
Response: All of LTD Broadband's awarded census blocks are located in rural areas. See map below.



2. Exhibit A attached to the Company's application provides the census block groups awarded to LTD Broadband for RDOF funding. Provide a listing of the 15-digit individual census blocks for which LTD Broadband was awarded RDOF funding. Provide the listing in Excel spreadsheet format.

Response: Please see Exhibit DR1-2. A list by county is provided below as well.

- SD
 - Brookings
 - 460119587003.kmz
 - 460119587003.kmz
 - Butte
 - 460199676001.kmz
 - 460199676001.kmz
 - 460199676002.kmz
 - 460199676002.kmz
 - 460199677001.kmz
 - 460199677001.kmz
 - 460199677002.kmz
 - 460199677002.kmz
 - Clay
 - 460279657002.kmz
 - 460279657002.kmz
 - 460279657003.kmz
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 - 460279658004.kmz
 - 460279658004.kmz
 - 460279659003.kmz
 - 460279659003.kmz
 - Codington
 - 460299541001.kmz
 - 460299541001.kmz
 - 460299541002.kmz
 - 460299541002.kmz
 - 460299543011.kmz
 - 460299543011.kmz
 - 460299543021.kmz
 - 460299543021.kmz
 - 460299545011.kmz
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 - 460299545023.kmz
 - 460299546001.kmz
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 - 460299546002.kmz**
 - 460299546002.kmz
 - Corson
 - 460319410001.kmz
 - 460319410001.kmz
 - 460319410002.kmz
 - 460319410002.kmz
 - Custer
 - 460339651001.kmz
 - 460339651001.kmz
 - 460339651003.kmz
 - 460339651003.kmz
 - 460339652001.kmz
 - 460339652001.kmz

- Deuel
 - 460399536002.kmz
 - 460399536002.kmz
- Dewey
 - 460419417002.kmz
 - 460419417002.kmz
- Hamlin
 - 460579551002.kmz
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- Hand
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 - 460819663011.kmz
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- ▼ Pennington
 - 461030109033.kmz
 - 461030109033.kmz
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 - 461030110041.kmz
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 - 461030117003.kmz
- ▼ Stanley
 - 461179601001.kmz
 - 461179601001.kmz
 - 461179601002.kmz
 - 461179601002.kmz
- ▼ Todd
 - 461219402001.kmz
 - 461219402001.kmz
- ▼ Union
 - 461270201001.kmz
 - 461270201001.kmz
 - 461270202001.kmz
 - 461270202001.kmz
 - 461270203001.kmz
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 - 461270203002.kmz
 - 461270203003.kmz
 - 461270203003.kmz

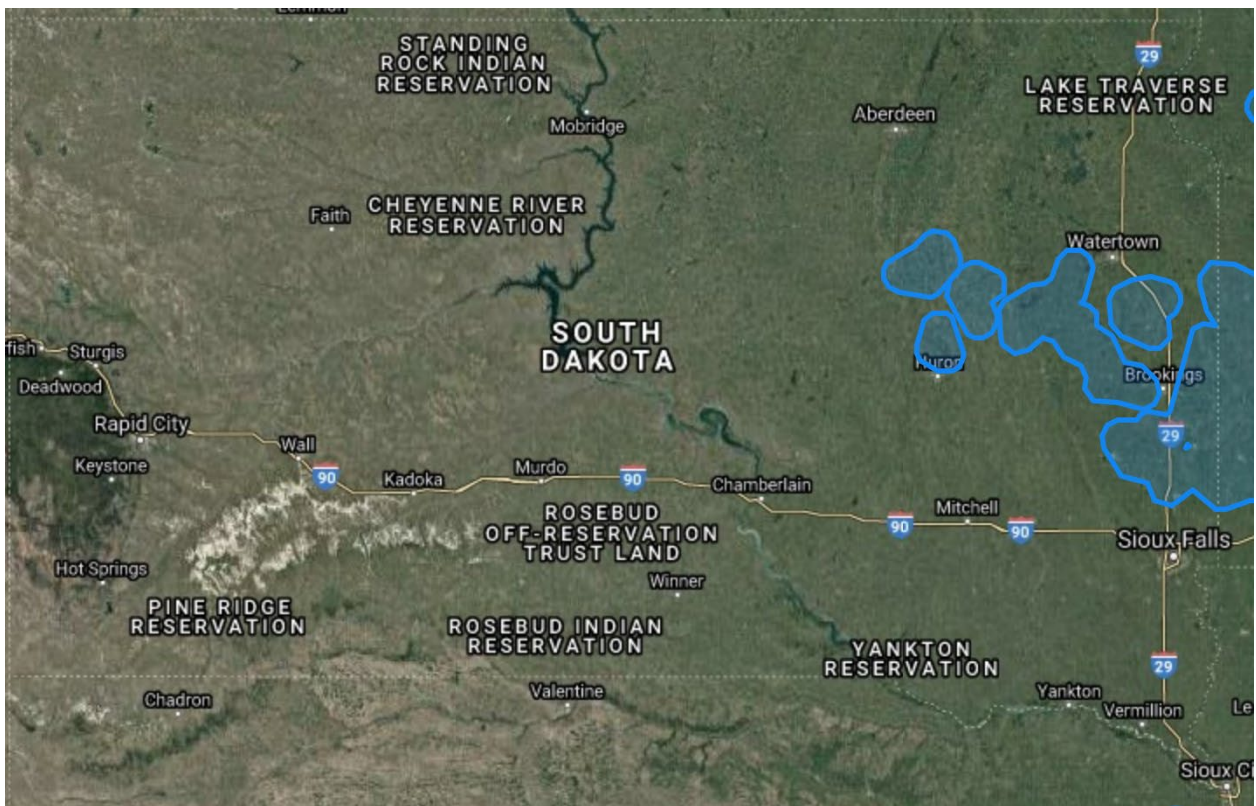
- ▼ Yankton
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3. Refer to LTD Broadband's application, page 3. LTD Broadband indicates its currently has a 50,000 square mile fixed wireless coverage area with 2144 tower sites in Iowa, Minnesota, Nebraska, South Dakota, and Wisconsin. What is the Company's current coverage area in South Dakota and what types of services are currently provided in this area? How long has LTD Broadband been providing service in South Dakota?

Response: To accommodate a variety of customers and budgets, LTD Broadband offers broadband speeds at a variety of speeds and price points. More information can be found here: <https://ltdbroadband.com/plans>

Speeds of up to 1 Gbps over a hybrid network of fixed wireless and fiber are available.

LTD Broadband began offering internet service in South Dakota in 2018.



5. Refer to LTD Broadband's application, page 1. The Company indicates it will simultaneously be filing an application to become a telecommunications carrier with the Commission. Such application has not yet been received. When does the Company plan to file its application for a Certificate of Authority?

Response: Company intends to file its application for a Certificate of Authority by the end of February.

6. Regarding LTD Broadband's voice and broadband plans discussed on page 4 of its application:

a. Explain why the voice plan without internet is \$5 more than the voice plan with internet.

Response: Offering standalone voice is an obligation for areas where LTD is an ETC. Given that LTD Broadband doesn't charge any hidden fees like EAS, Federal Access Fees, LNP fees, we feel that \$24.95 is a competitive price for standalone voice including unlimited lower-48 long distance calling. We will charge mandated recovery charges like 911 and remit them as required in South Dakota. The \$5 discount for voice combined with broadband is an industry standard form of a bundled service offering and often expected by consumers.

b. LTD Broadband's website currently lists the following available plans:

- 6 mbps download/1 mbps upload from \$50/month
- 10 mbps download/2 mbps upload from \$70/month
- 25 mbps download/3 mbps upload from \$80/month
- 35 mbps download/7 mbps upload from \$110/month

i. Assuming the \$30 broadband service discussed in the application is for the 1 GB services the Company plans to provide, explain how LTD Broadband proposes to provide 1 GB upload and download service for \$30/month given the current services offered for much lower speeds at higher prices, as shown above.

Response: The RDOF award requires Company to make 1 GB speeds available in its service area, but not at the \$30 price point. Gigabit service plans will vary depending on the market and the underlying economics to profitably serve the area including towers and equipment to be deployed as well as backhaul transport costs.

ii. If LTD Broadband is able to offer 1 GB download/ 1 GB upload service for \$30/month, will the prices for lower speed service be reduced? Please explain.

Response: See answer above.

iii. If the \$30/month service discussed is not for 1 GB download/ 1 GB upload, provide the price LTD Broadband will charge for the 1 GB service.

Response: See answer above.

8. Is LTD Broadband limited to running fiber to locations currently unserved within the RDOF-awarded census blocks? Or, can LTD Broadband provide service to any location within each RDOF-awarded census block?

Response: Each awarded census block has a listed number of locations. LTD can service more locations than are enumerated in the FCC's count by reporting the gain of locations to the FCC. Similarly, if there are fewer locations than the FCC believes exist, we will report that to the FCC. Our subsidy amount will be adjusted to match the number of locations we serve in each CBG.

9. Provide a plan to provide the proposed service in South Dakota, including a timeline.

Response: Those engineering plans are still in development and will be provided as soon as they are available. The timelines for construction will be consistent with FCC RDOF rules and reimbursement targets.

10. Refer to LTD Broadband's application, pages 13-14. The Company states: "...are a unique alternative to services provided by traditional wireline carriers within the Company's designated service area." Explain in detail the similarities and differences between LTD Broadband's services compared to services provided by other carriers in the Company's designated service area. Is LTD Broadband able to provide the same quality of service as the traditional wireline carriers? Please explain.

Response: This question implies that traditional wireline carriers provide a superior level of service. LTD believes that being "traditional" has no correlation with service quality. By definition, the areas that Company will be building service to are in unserved areas. Wireline local exchange carriers in rural areas offer broadband in many areas using old copper plant and DSL. The inherent distance limitations of DSL and decaying physical plant results in poor quality service offerings. Rural providers of all kinds recognize this and have developed fixed wireless and fiber networks (many with state and federal government funding) to overcome the limitations of traditional wireline infrastructure by using modern methods.

11. Provide all RDOF applications LTD Broadband made to the FCC regarding the census blocks identified in Exhibit A.

Response: As these applications are very large files, a link will be provided in a supplemental data request response to access them.

12. Provide all other information as required in ARSD 20:10:32:42 through 20:10:32:46.

Response: ARSD 20:10:32:42- Company notes that the areas awarded via RDOF are by definition “unserved.” To the extent these areas are in a service territory of a rural ILEC, the public interest is served by allowing Company to use RDOF funding to provide service to customers that their local rural ILEC has failed to provide broadband to.

ARSD 20:10:32:43- Please see Company’s ETC application.

ARSD 20:10:32:43.01- Please see Company’s ETC application.

ARSD 20:10:32:43.02- Please see the Company’s ETC application. Company will follow FCC RDOF timelines. Some portions of the network will be completed within two years, but not all. A supplemental response will be provided with more granular technological detail as soon as it is available.

ARSD 20:10:32:43.03- A supplemental response will be provided with more granular technological detail as soon as it is available.

ARSD 20:10:32:43.04- Please see Company’s ETC application.

ARSD 20:10:32:43.05- Please see Company’s ETC application.

ARSD 20:10:32:43.06- Please see Company’s ETC application.

ARSD 20:10:32:43.07- Please see Company’s ETC application. Also, Company notes that it will not be drawing funds from the South Dakota universal service funding mechanism, and as such, also serves the public interest

ARSD 20:10:32:44- Not applicable.

ARSD 20:10:32:45- Please see Company’s ETC application.

ARSD 20:10:32:46- Company will provide copies of its ETC application to other ETCs in South Dakota as soon as possible. Company has not been able to locate a list of ETCs in South Dakota on the Commission’s website or via any other source.

Dated this 11th of February 2021.



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Exhibit DR1-2
Spreadsheet of Census Blocks

**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 discovery request of the South Dakota Telecommunications Association (SDTA) were served electronically to the Parties listed below, on this 9th day of April, 2021:

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/s/ Brett Heather Freedson

Brett Heather Freedson