

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 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.

Date: April 9, 2021