

**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

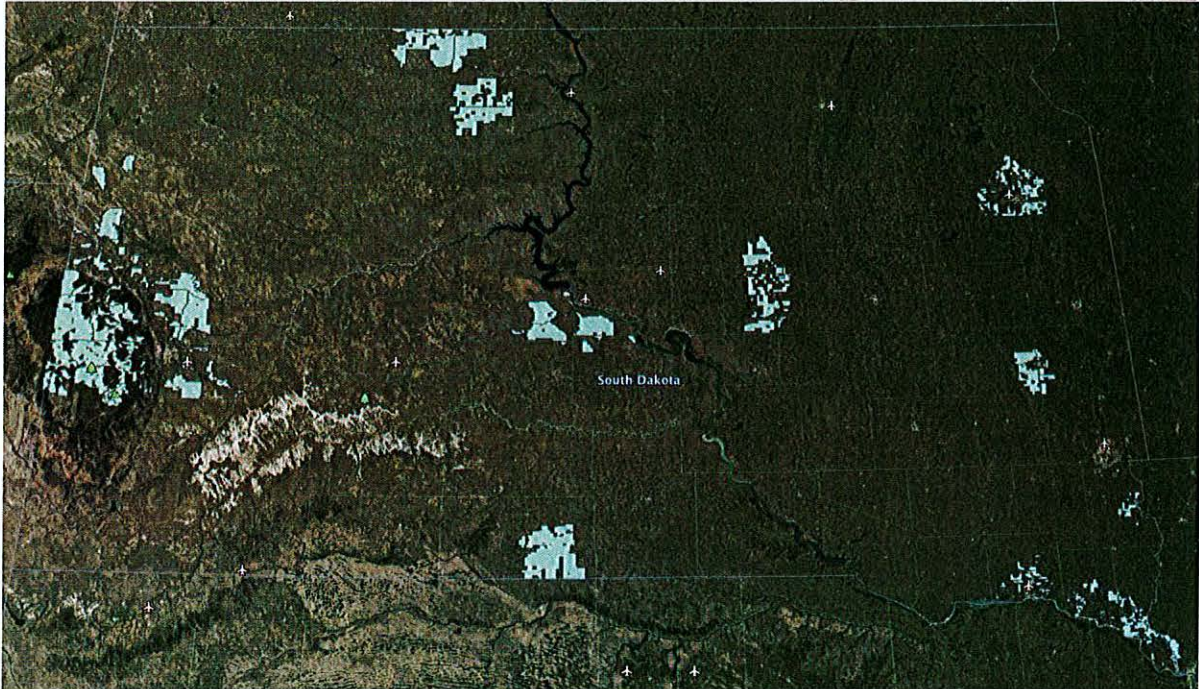
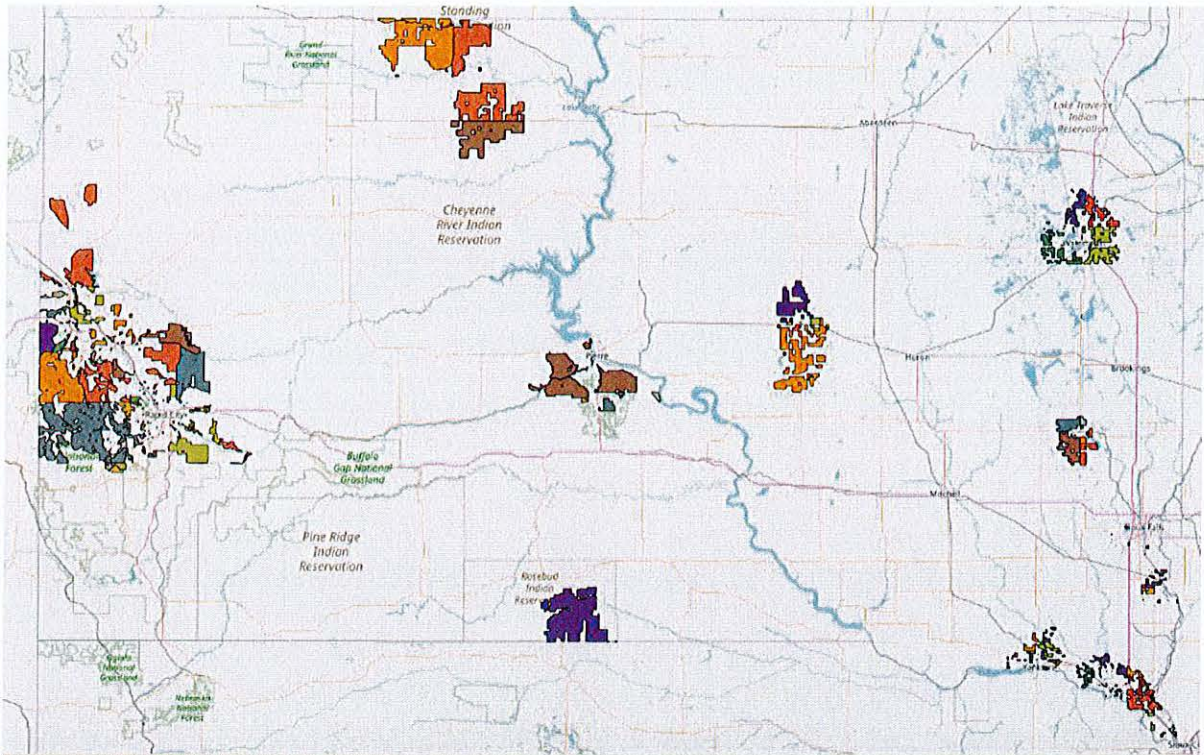
**Please indicate the LTD Broadband representative, including contact info, responsible for each response.**

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.



Applicant000040



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
    - 460279657003.kmz
    - 460279658003.kmz
    - 460279658003.kmz
    - 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
    - 460299545011.kmz
    - 460299545023.kmz
    - 460299545023.kmz
    - 460299546001.kmz
    - 460299546001.kmz
    - 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
  - 460579551002.kmz
- ▼ Hand
  - 460599756001.kmz
  - 460599756001.kmz
  - 460599756002.kmz
  - 460599756002.kmz
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  - 460599757001.kmz
  - 460599757002.kmz
  - 460599757002.kmz
- ▼ Jones
  - 460750916001.kmz
  - 460750916001.kmz
- ▼ Lake
  - 460799601001.kmz
  - 460799601001.kmz
  - 460799601002.kmz
  - 460799601002.kmz
  - 460799601003.kmz
  - 460799601003.kmz
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  - 460799602002.kmz
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  - 460799602003.kmz
  - 460799603001.kmz
  - 460799603001.kmz
  - 460799603002.kmz
  - 460799603002.kmz

- 460819661001.kmz
    - 460819661001.kmz
    - 460819661002.kmz
    - 460819661002.kmz
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    - 460830104002.kmz
    - 460830104002.kmz
- 460859401001.kmz
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  - 460859726001.kmz
  - 460859726001.kmz

- 460930203011.kmz
  - 460930203011.kmz
  - 460930203012.kmz
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  - 460930205002.kmz
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  - 460990010013.kmz
  - 460990103002.kmz
  - 460990103002.kmz

- ▼ Pennington
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  - 461030109051.kmz
  - 461030109071.kmz
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  - 461030117001.kmz
  - 461030117002.kmz
  - 461030117002.kmz
  - 461030117003.kmz
  - 461030117003.kmz
- ▼ Stanley
  - 461179601001.kmz
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- ▼ Todd
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- ▼ Union
  - 461270201001.kmz
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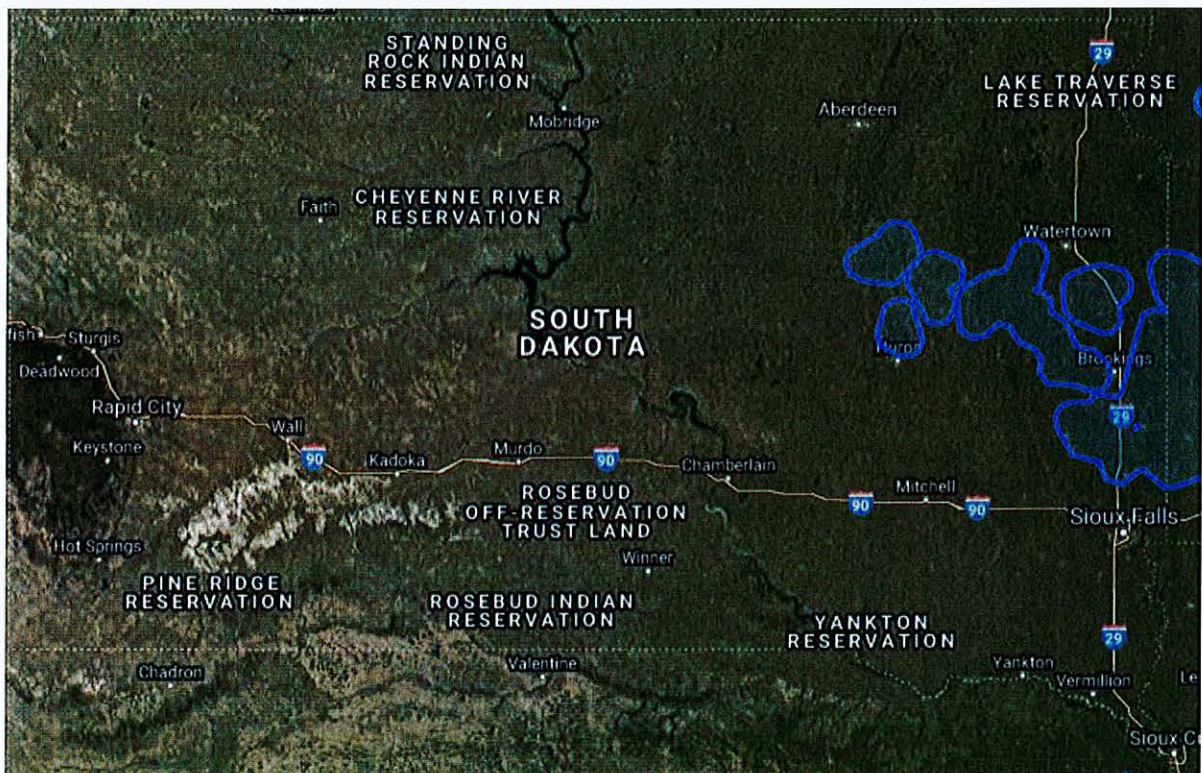
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  - 461359664003.kmz
  - 461359664004.kmz
  - 461359664004.kmz
  - 461359664005.kmz
  - 461359664005.kmz

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?

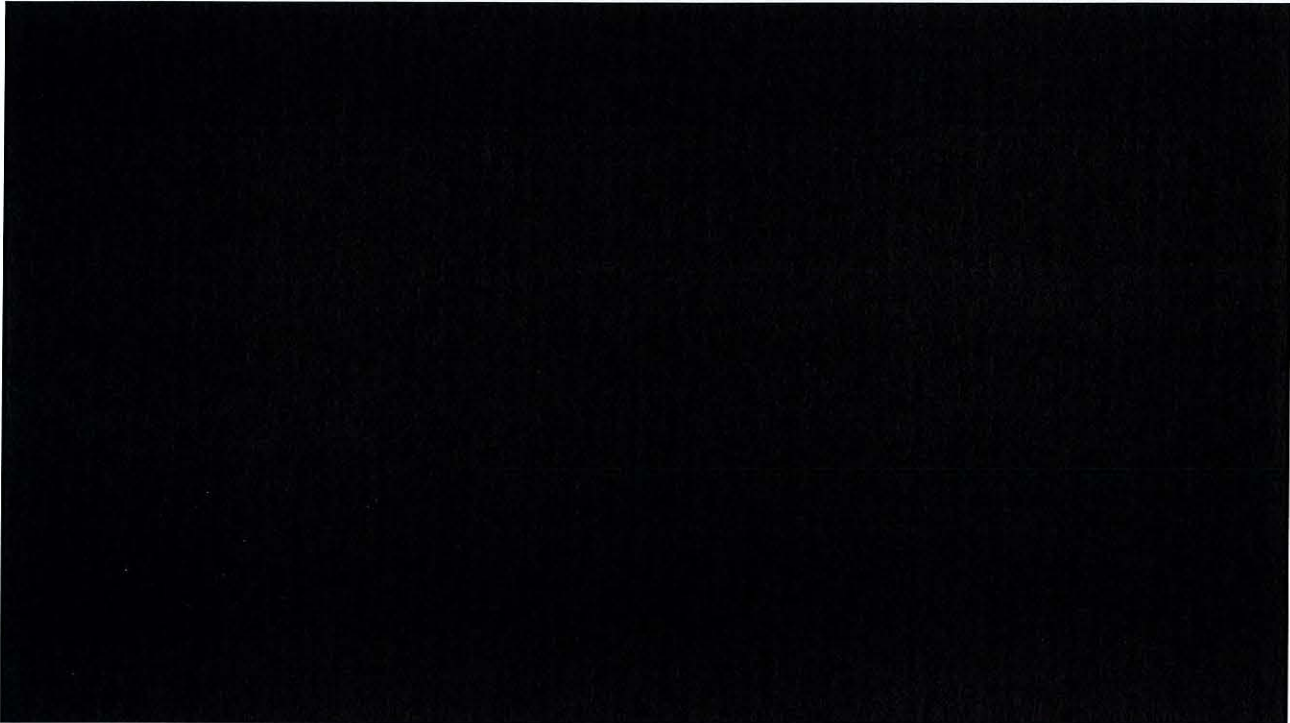
Response: To accommodate a variety of customers and budgets, LTD Broadband offers broadband speeds at a variety of speeds and price points. More information can be found here: <https://ltdbroadband.com/plans>

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.



4. Refer to LTD Broadband's application, page 3. The Company states it has begun deploying fiber optic networks in select areas.





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.

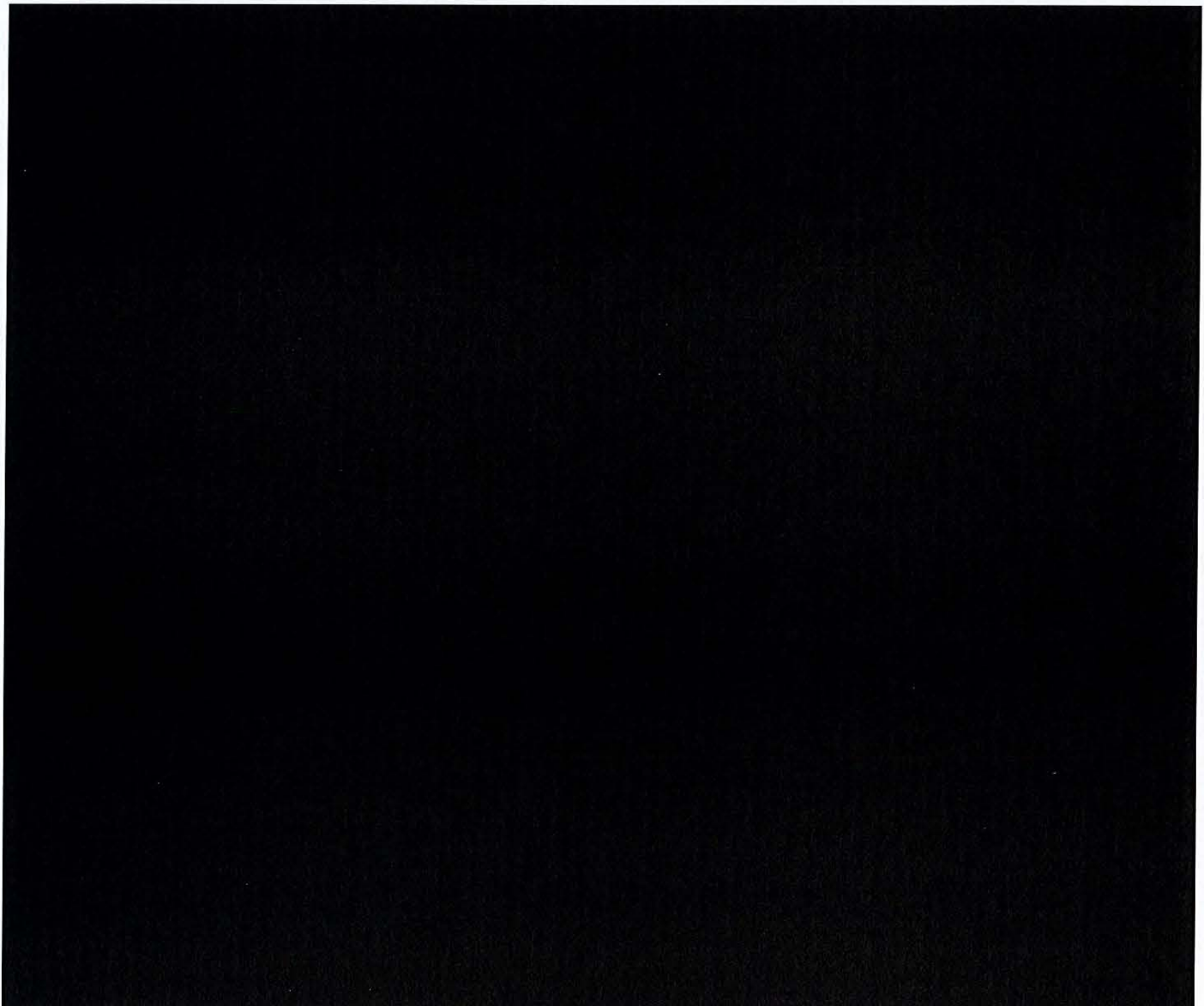
ii. If LTD Broadband is able to offer 1 GB download/ 1 GB upload service for \$30/month, will the prices for lower speed service be reduced? Please explain.

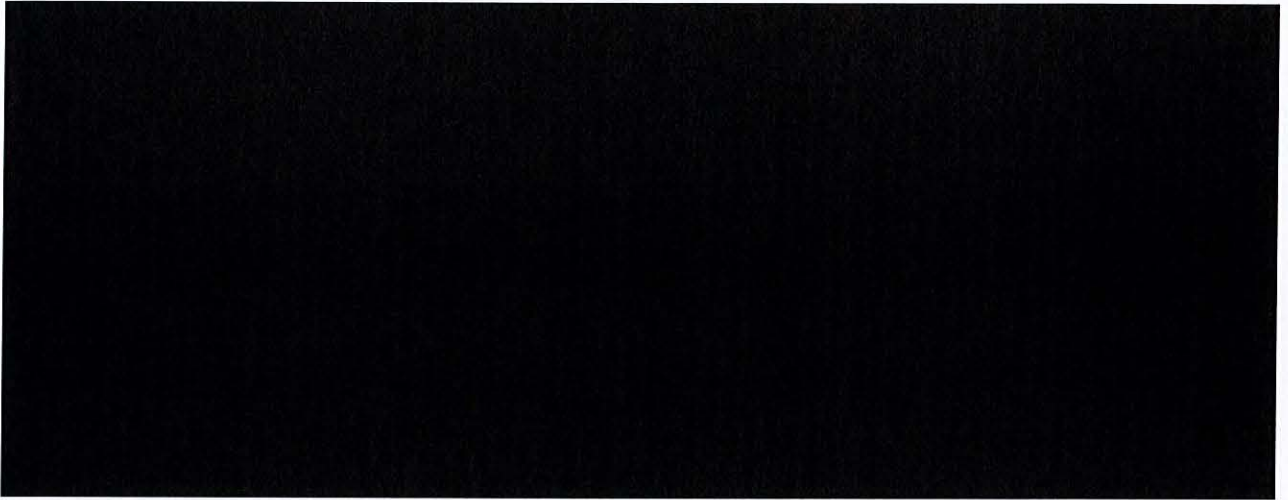
Response: See answer above.

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.

7. LTD Broadband makes the following statements in its application:
- Page 9: "LTD Broadband will provide broadband services with the capability to transmit data to and receive data by wire or radio" and "Customers will be provided last mile access by a fiber optic connection."
  - Page 10: "LTD Broadband provides high-speed broadband and digital telephone services...utilizing a combination of fiber optic, and unlicensed and licensed wireless frequencies (for backhaul). LTD Broadband will provide supported services using its network infrastructure, consisting of last mile connections and network equipment and components consistent with the RDOF award criteria. It will also utilize its own facilities to provide backhaul for interconnection via a combination of fiber and wireless microwave technologies."





Applicant000051

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 11<sup>th</sup> of February 2021.



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Applicant000057

Exhibit DR1-2  
Spreadsheet of Census Blocks

Applicant000058