

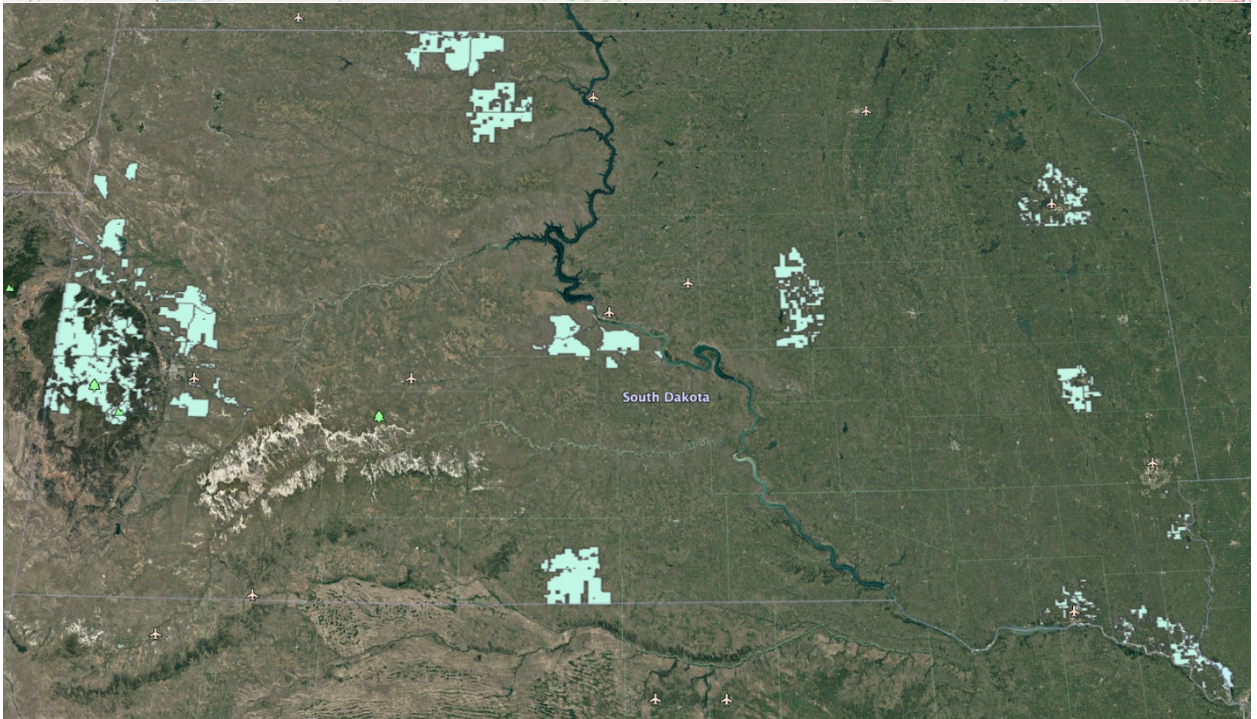
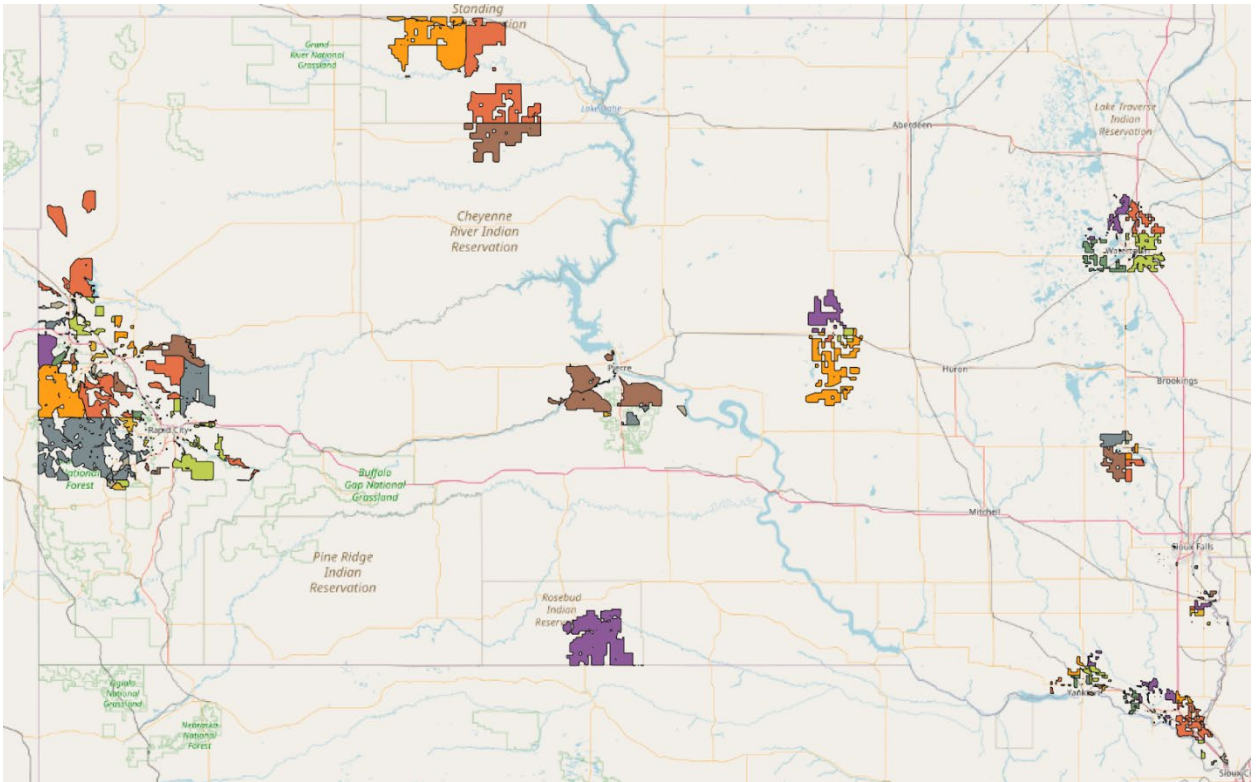
EXHIBIT LT-D4
PUBLIC

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
 - 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
 - ▼ 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
 - 460599757001.kmz
 - 460599757001.kmz
 - 460599757002.kmz
 - 460599757002.kmz
- ▼ Jones
 - 460750916001.kmz
 - 460750916001.kmz
- ▼ Lake
 - 460799601001.kmz
 - 460799601001.kmz
 - 460799601002.kmz
 - 460799601002.kmz
 - 460799601003.kmz
 - 460799601003.kmz
 - 460799602002.kmz
 - 460799602002.kmz
 - 460799602003.kmz
 - 460799602003.kmz
 - 460799603001.kmz
 - 460799603001.kmz
 - 460799603002.kmz
 - 460799603002.kmz

- ▼  Lawrence
 -  460819661001.kmz
 -  460819661001.kmz
 -  460819661002.kmz
 -  460819661002.kmz
 -  460819661003.kmz
 -  460819661003.kmz
 -  460819663011.kmz
 -  460819663011.kmz
 -  460819663021.kmz
 -  460819663021.kmz
 -  460819663022.kmz
 -  460819663022.kmz
 -  460819663023.kmz
 -  460819663023.kmz
 -  460819666001.kmz
 -  460819666001.kmz
 -  460819666002.kmz
 -  460819666002.kmz
- ▼  Lincoln
 -  460830101011.kmz
 -  460830101011.kmz
 -  460830101051.kmz
 -  460830101051.kmz
 -  460830101072.kmz
 -  460830101072.kmz
 -  460830101073.kmz
 -  460830101073.kmz
 -  460830102001.kmz
 -  460830102001.kmz
 -  460830102002.kmz
 -  460830102002.kmz
 -  460830102003.kmz
 -  460830102003.kmz
 -  460830103001.kmz
 -  460830103001.kmz
 -  460830103004.kmz
 -  460830103004.kmz
 -  460830104001.kmz
 -  460830104001.kmz
 -  460830104002.kmz
 -  460830104002.kmz
- ▼  Lyman
 -  460859401001.kmz
 -  460859401001.kmz
 -  460859726001.kmz
 -  460859726001.kmz

- ▼  Meade
 -  460930203011.kmz
 -  460930203011.kmz
 -  460930203012.kmz
 -  460930203012.kmz
 -  460930203013.kmz
 -  460930203013.kmz
 -  460930203021.kmz
 -  460930203021.kmz
 -  460930203022.kmz
 -  460930203022.kmz
 -  460930203023.kmz
 -  460930203023.kmz
 -  460930204001.kmz
 -  460930204001.kmz
 -  460930204004.kmz
 -  460930204004.kmz
 -  460930205001.kmz
 -  460930205001.kmz
 -  460930205002.kmz
 -  460930205002.kmz
- ▼  Minnehaha
 -  460990010013.kmz
 -  460990010013.kmz
 -  460990103002.kmz
 -  460990103002.kmz

- ▼ Pennington
 - 461030109033.kmz
 - 461030109033.kmz
 - 461030109051.kmz
 - 461030109051.kmz
 - 461030109071.kmz
 - 461030109071.kmz
 - 461030110041.kmz
 - 461030110041.kmz
 - 461030110042.kmz
 - 461030110042.kmz
 - 461030110051.kmz
 - 461030110051.kmz
 - 461030110052.kmz
 - 461030110052.kmz
 - 461030113003.kmz
 - 461030113003.kmz
 - 461030114003.kmz
 - 461030114003.kmz
 - 461030115001.kmz
 - 461030115001.kmz
 - 461030116003.kmz
 - 461030116003.kmz
 - 461030116005.kmz
 - 461030116005.kmz
 - 461030117001.kmz
 - 461030117001.kmz
 - 461030117002.kmz
 - 461030117002.kmz
 - 461030117003.kmz
 - 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

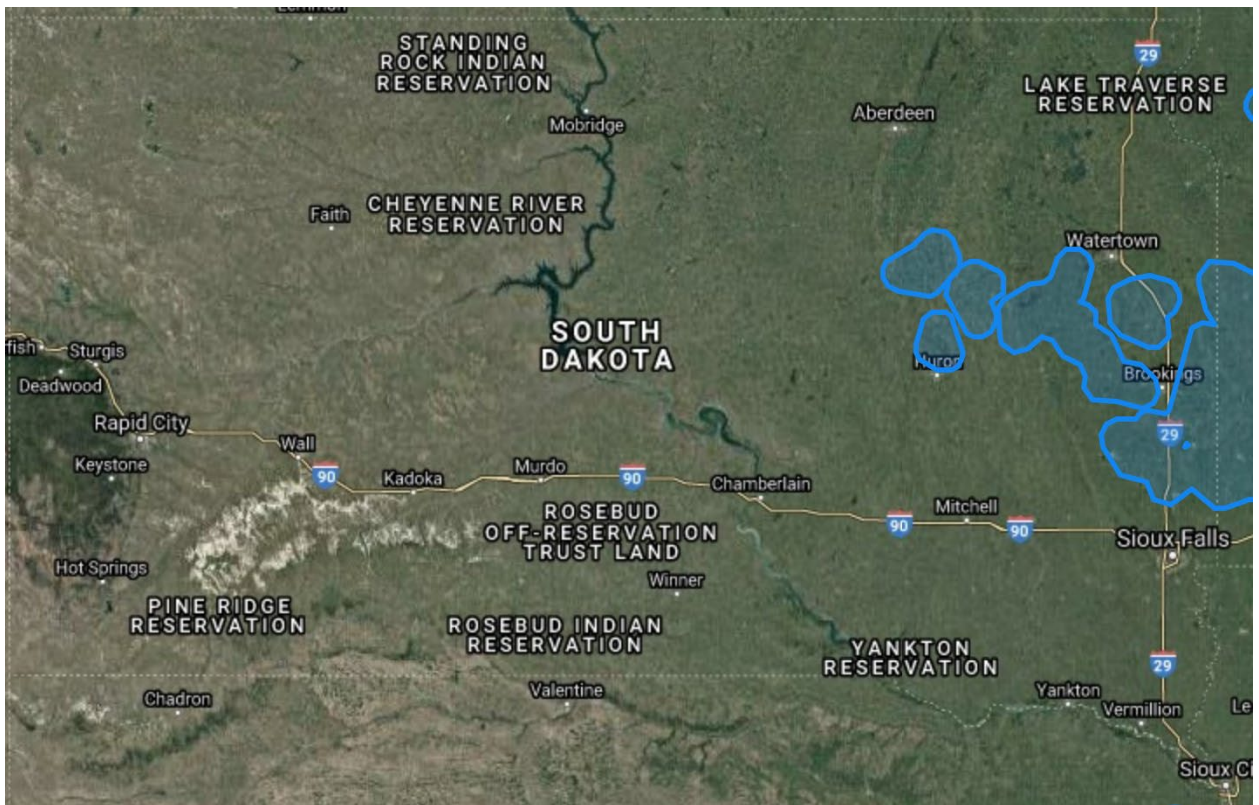
- ▼ Yankton
 - 461359662001.kmz
 - 461359662001.kmz
 - 461359662004.kmz
 - 461359662004.kmz
 - 461359663012.kmz
 - 461359663012.kmz
 - 461359664001.kmz
 - 461359664001.kmz
 - 461359664002.kmz
 - 461359664002.kmz
 - 461359664003.kmz
 - 461359664003.kmz
 - 461359664004.kmz
 - 461359664004.kmz
 - 461359664005.kmz
 - 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.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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.



Kristopher E. Twomey
Counsel to LTD Broadband
Law Office of Kristopher E. Twomey, P.C.
1725 I Street, NW, Suite 300
Washington, DC 20006

Exhibit DR1-2
Spreadsheet of Census Blocks

Matter of Application of LTD Broadband LLC
Docket No. TC21-001
Responses of LTD Broadband LLC to
First Data Request of Commission Staff

Request 1-11: Provide all RDOF applications LTD Broadband made to the FCC regarding the census blocks identified in Exhibit A.

Supplemental Response: LTD Broadband filed a single RDOF long form application with the FCC, which application covered all states for which LTD Broadband was presumptively awarded RDOF support. LTD Broadband's publicly available applicant information may be accessed on the FCC's website (<https://auctionfiling.fcc.gov/form175/search175/index.htm>). Copies of the attachments that, with the publicly available information accessible at the link above, comprise LTD Broadband's long form RDOF application are appended hereto. Other than the Construction Funding Detail (pp. 2-6), which LTD Broadband provided to Staff and SDTA on August 30, 2021, all of the documents included in the attached were provided to Staff and SDTA previously.

Date: September 3, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff**

Request 2-1: Refer to LTD Broadband’s response to Staff Data Request 1-2. Staff requested LTD Broadband provide the 15-digit individual census blocks for which LTD Broadband was awarded RDOF funding. The Company provided the 12-digit census block groups which were already provided in Exhibit A of the application.

- a) Please provide the more granular 15-digit census blocks.
- b) Confirm LTD Broadband is seeking ETC certification at the census block level, not the census block group level.

Response:

- a) A complete list of the 15-digit individual census blocks for which LTD Broadband is seeking ETC designation is attached hereto as **Exhibit 2.1**.
- b) Confirmed.

Date: June 18, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

Matter of Application of LTD Broadband LLC
Docket No. TC21-001

CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff

Request 2-2: Refer to LTD Broadband's Confidential Response to Staff Data Request 1-11, provided April 9, 2021. ****BEGIN CONFIDENTIAL****

a) [Redacted]

[Redacted]

c) [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

****BEGIN CONFIDENTIAL****

a) [Redacted]

Matter of Application of LTD Broadband LLC
Docket No. TC21-001

CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff

b) [Redacted]

[Redacted]

[Redacted]

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff**

Date: June 18, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff**

Request 2-3: Provide a list of all states where LTD Broadband has been granted ETC status, to-date. Provide the state, docket or case number, and decision date for each.

Response: A complete list of states where LTD Broadband’s application for certification as an ETC to receive RDOF support has been approved, to date, to is provided below:

<u>State</u>	<u>Docket No.</u>	<u>Status</u>
Colorado	C21-0330 21A-0176T	Granted, 06/02/2021
Illinois	21-0373	Granted, 05/27/21
Indiana	41052 ETC 96	Granted, 06/02/2021
Minnesota	P-6995/M-21-133, P-999/CI-21-86	Granted, 06/03/2021
Missouri	DA-2021-0205	Granted, 06/02/2021
Ohio	21-30-TP-UNC	Granted, 06/02/2021
Wisconsin	11127-TI-100	Granted, 06/03/2021

Date: June 18, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff**

Request 2-4: Provide a list of all states where LTD Broadband has been denied ETC status, to-date. Provide the state, docket or case number, and decision date for each.

Response: To date, LTD Broadband has not been denied ETC status in any state.

Date: June 18, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff**

Request 2-5: Refer to LTD Broadband's responses to Staff DR 1-6a and SDTA's Second Discovery Request Item 2, regarding standalone voice service. Please confirm the Company plans to offer VOIP voice service. If so, explain how a customer will utilize VOIP if it does not have an internet subscription. If not, explain the type of standalone voice service LTD Broadband plans to offer.

Response: LTD Broadband plans to provide VoIP service. If a customer subscribes to receive voice service but not internet service, LTD Broadband will deliver internet service that powers only the VoIP ATA, and prevents the provision of non-VoIP internet service by a firewall filter.

Date: June 18, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff**

Request 2-6: Refer to LTD Broadband’s response to SDTA Second Discovery Request Item 6. LTD Broadband states: “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.”

- a) Specify the criteria that determines whether a customer in the awarded RDOF census blocks will or will not receive service.
- b) Confirm LTD Broadband is committed to serving potential customers in its award RDOF area consistent with the commitment pursuant to ARSD 20:10:32:43.01.

Response:

- a) LTD Broadband must deploy its network in a manner that ensures that a potential customer who requests service can be served within ten (10) days of the date on which the customer’s request is made. To do so, the network will be constructed such that a drop may be installed to provide service to a new customer within a ten (10) day time period. However, a drop to a residence on private property may be placed only if the potential customer provides LTD Broadband an easement to enter the property and install the drop. If the easement is denied, LTD Broadband will likely be unable to serve the customer. LTD Broadband may also use its facilities in combination with facilities provided by third parties to provide service.
- b) Confirmed.

Date: June 18, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff**

Request 2-7: Has the FCC approved LTD Broadband's long-form? If not, what is the status of the application?

Response: No, the FCC has not yet approved LTD Broadband's long-form application for RDOF support, and it is not permitted to do so before LTD Broadband becomes certified as an ETC.

Date: June 18, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**CONFIDENTIAL Responses of LTD Broadband LLC to
Second Data Request of Commission Staff**

Request 2-8: Did LTD Broadband request and receive a waiver of the June 7th deadline to be certified as an ETC in South Dakota from the FCC?

Response: LTD Broadband filed its Petition for Limited Waiver with the FCC on June 7, 2021, but the Petition has not yet been approved. If the FCC follows the same process that it did with respect to CAF Phase II applications, LTD Broadband expects that the waiver will be granted concurrent with the FCC's authorization of RDOF support to LTD Broadband.

Date: June 18, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**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 Commission Staff’s Second Data Request were served electronically to the Parties listed below, on this 18th day of June, 2021:

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/s/ Brett Heather Freedson

Brett Heather Freedson

Matter of Application of LTD Broadband LLC
Docket No. TC21-001

Responses of LTD Broadband LLC to
Third Data Request of Commission Staff

Request 3-1: Refer to the Company’s application, page 10 where it states: “LTD Broadband will advertise the availability of the Supported Services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services.”

- a) Explain what is meant by “in a manner that is designed to reach those likely to qualify for such services.”
- b) Does this statement refer to all services or only Lifeline services?
- c) What types of media will LTD Broadband utilize for advertising the availability of services (newspaper, bill inserts, websites, etc.)? Will type of media differ for general services vs. Lifeline?

Response:

- a) To advertise the availability of Supported Services within the areas for which LTD Broadband is awarded RDOF funds, the company will direct mail postcards to prospective customers, which will include information about LTD’s Lifeline services. LTD Broadband also will advertise the availability of Lifeline services on its website.
- b) The statement made in response to (a) above refers only to Lifeline services.
- c) LTD Broadband will use the same types of media to advertise its general services, as it will its Lifeline services. As indicated in response to (a) above, this will include advertisement by direct mail, and on LTD Broadband’s website.

Date: August 25, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Data Request of Commission Staff**

Request 3-2: Refer to the Company’s application, page 11. The Company states it “will satisfy all consumer protection and service quality standards as provided in 47 CFR §54.202(a)(3), as well as all applicable state specific consumer protection and service quality standards.” In particular, does LTD Broadband commit to applicable requirements in ARSD 20:10:33?

Response: Yes. LTD Broadband commits to abide by the applicable requirements of ARSD 20:10:33.

Date: August 25, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Data Request of Commission Staff**

Request 3-3: Regarding ARSD 20:10:32:43.05, provide documentation demonstrating LTD Broadband will offer a local usage plan comparable to the one offered by the incumbent local exchange carrier in the service areas for which the Company seeks designation.

Response: LTD Broadband commits to offer a local usage plan comparable to the plan offered by the ILEC within each service area subject to its Application, which plan will include unlimited local calls. Documentation of LTD Broadband's local usage plan is not available at this time, but the plan will be in place at the time that LTD Broadband commences service.

Date: August 25, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Data Request of Commission Staff**

Request 3-4: Refer to LTD Broadband's response to Staff Data Request 1-6.

- a) What services (upload/download speeds) will be available to customers at the \$30 price point?
- b) In response to SDTA's Data Request 1, Item 5, LTD Broadband states that symmetrical 1 Gbps service will be made available at a cost of \$140.00 per month and in Item 15 states that a service plan will offer 1 Gbps/500 Mbps speeds at a cost that does not exceed the maximum monthly rate prescribed by the FCC. Provide a complete listing of all planned internet and voice service offerings, including upload/download speeds and prices, that will be available to South Dakota customers in the census blocks to be served with RDOF funding.
- c) Will prices be the same across LTD Broadband's footprint, or will they differ by location? Please explain.

Response:

- a) The service available at the price point of \$30.00 per month is a standalone voice service.
- b) In the areas for which LTD Broadband is awarded RDOF funds, the FCC's rules require only that LTD Broadband offer service at a speed of 1 Gbps/500 Mbps, at a rate that does not exceed the maximum monthly rate prescribed by the FCC's Urban Rate Survey. LTD Broadband commits to do so. LTD Broadband anticipates that other internet access service plans will be available in South Dakota. However, such plans are not known at this time, and are not relevant to LTD Broadband's ETC Application.
- c) LTD Broadband anticipates that prices will vary within its service footprint, based on location, but in all cases, the requirements of the FCC's Urban Rate Survey will be met.

Date: August 25, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Data Request of Commission Staff**

Request 3-5: Refer to LTD Broadband's response to Staff Data Request 1-12. Regarding ARSD 20:10:32:43.06, please point to the location in the Company's application which addresses this rule. If it is not addressed in the application, please certify the Company will comply or explain if the rule is not applicable.

Response: LTD Broadband hereby certifies that it will comply with ARSD 20:10:32:43.06.

Date: August 25, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Data Request of Commission Staff**

Request 3-6: Explain the process and implications for LTD's census blocks in the following hypothetical situations:

- a) If LTD Broadband does not meet FCC buildout requirements or is unable to get necessary permits or approvals to build in certain areas.
- b) If LTD Broadband is denied ETC certification in any state.

Response:

- a) If LTD Broadband does not meet buildout requirements, it could suffer a suspension or reduction in support consistent with the FCC's rules. If LTD Broadband is unable to obtain necessary local permits or approval to build in certain areas, it may or may not have a consequential effect on LTD Broadband's ability to meet its buildout obligations. This is because the FCC determines performance at the state level, so that a deficit in locations in one area could possibly be offset by increases in locations in other areas of the state.
- b) If LTD Broadband is denied ETC certification in a state, it will be ineligible to receive RDOF support in that state.

Date: August 25, 2021

By: Corey Hauer, Chief Executive Officer, LTD Broadband LLC

VERIFICATION

I, Corey Hauer, am the CEO for LTD Broadband LLC, and I hereby state that the facts set forth in the foregoing responses of LTD Broadband LLC to the Third Data Request of Commission Staff 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

**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 the Third Data Request of Commission Staff were served electronically on the Parties listed below, on this 25th day of August, 2021:

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/s/ Brett Heather Freedson

Brett Heather Freedson

**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

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 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

Date: April 9, 2021

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

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

Date: April 9, 2021

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 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.

Date: April 9, 2021

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 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.

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 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.

Date: April 9, 2021

**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 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.

Date: April 9, 2021

**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 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.

Date: April 9, 2021

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 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.

Date: April 9, 2021

**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 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.

Date: April 9, 2021

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

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 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.

Date: April 9, 2021

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 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.

Date: April 9, 2021

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 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.

Date: April 9, 2021

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 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.

Date: April 9, 2021

**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 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.

Date: April 9, 2021

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

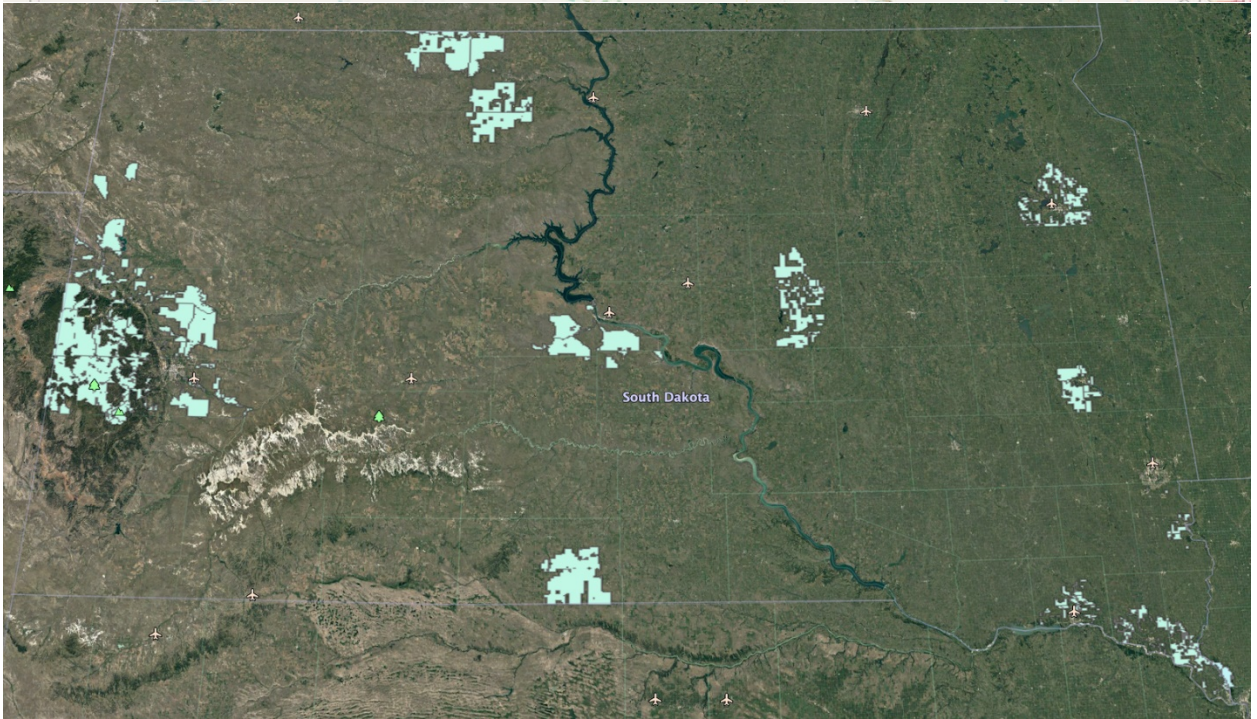
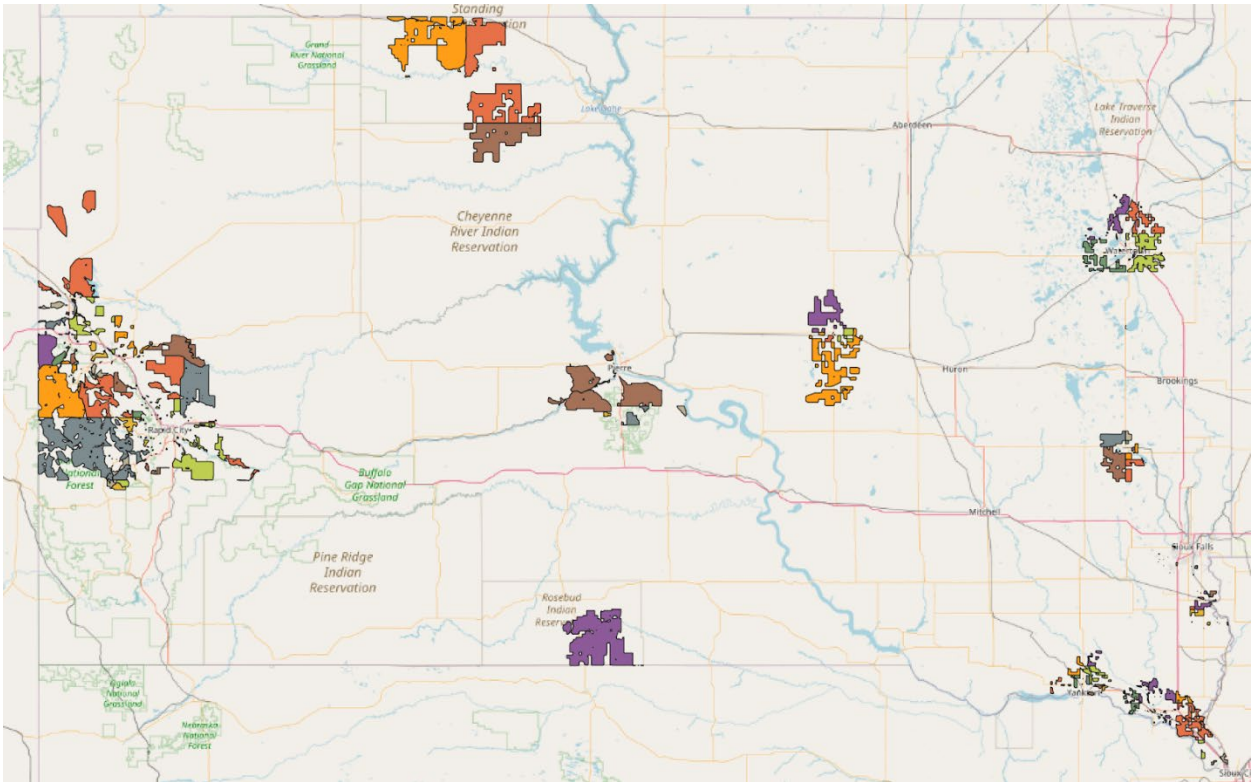
Date: April 9, 2021

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
 - 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
 - ▼ 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
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 - 460599756002.kmz
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- ▼ Jones
 - 460750916001.kmz
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- ▼ Lake
 - 460799601001.kmz
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 - 460799601002.kmz
 - 460799601002.kmz
 - 460799601003.kmz
 - 460799601003.kmz
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 - 460799602002.kmz
 - 460799602003.kmz
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 - 460799603001.kmz
 - 460799603001.kmz
 - 460799603002.kmz
 - 460799603002.kmz

- ▼  Lawrence
 -  460819661001.kmz
 -  460819661001.kmz
 -  460819661002.kmz
 -  460819661002.kmz
 -  460819661003.kmz
 -  460819661003.kmz
 -  460819663011.kmz
 -  460819663011.kmz
 -  460819663021.kmz
 -  460819663021.kmz
 -  460819663022.kmz
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- ▼  Meade
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 -  460930203013.kmz
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 -  460930203021.kmz
 -  460930203022.kmz
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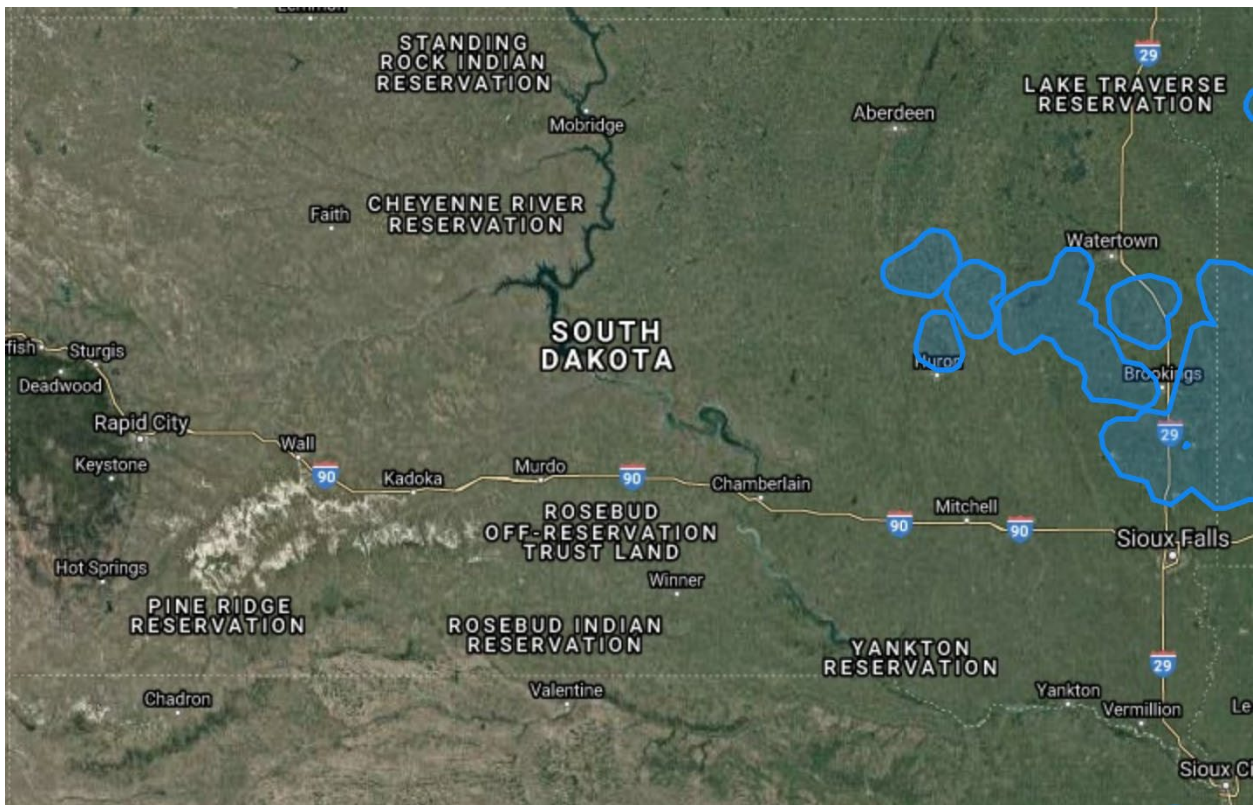
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3. Refer to LTD Broadband’s application, page 3. LTD Broadband indicates its currently has a 50,000 square mile fixed wireless coverage area with 2144 tower sites in Iowa, Minnesota, Nebraska, South Dakota, and Wisconsin. What is the Company’s current 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.



Kristopher E. Twomey
Counsel to LTD Broadband
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Washington, DC 20006

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

**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

**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 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.

Date: May 13, 2021

**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 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.

Date: May 13, 2021

**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 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.

Date: May 13, 2021

**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 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.

Date: May 13, 2021

**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 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.

Date: May 13, 2021

**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 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.

Date: May 13, 2021

**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 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.

Date: May 13, 2021

**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 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.

**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)**

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.

Date: May 13, 2021

**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 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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Brett Heather Freedson

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 1: In SDTA Discovery Request 2, Item 6, LTD wrote: “While LTD 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.”

LTD’s responses raises a question whether LTD is committed to provide service throughout its proposed designated service area to all customer making a reasonable request for service. Please clarify what LTD meant by its response to SDTA’s discovery.

Does LTD commit to providing service to all customers throughout the ETC designated areas in South Dakota?

Response: LTD Broadband will endeavor to provide service to all prospective customers within the service areas identified in its Application, upon request. Under the RDOF’s requirements, LTD Broadband must deploy its network in a manner that ensures that a potential customer who requests service can be served within ten (10) days of the date on which the customer’s request is made. To do so, LTD Broadband’s network will be constructed such that a drop may be installed to provide service to a new customer within a ten (10) day time period. However, a service drop to a residence on private property may be placed only if the prospective customer provides LTD Broadband with permission to enter the property and install the drop. If permission is denied, LTD Broadband will likely be unable to serve the customer. LTD Broadband may also use its facilities in combination with facilities provided by third parties to provide service.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 2: Is it necessary for LTD to obtain any National Forest Service permits or easements in SD? If so, specify:

- a) What LTD must receive from the National Forest Service.
- b) Where National Forest service permits or easements are necessary.
- c) Whether LTD has initiated any communication with the National Forest Service and if so, who is LTD's point of contact.
- d) What is the status of the National Forest Service proceeding?

Response: To the extent that LTD Broadband must obtain any permits or easements from the National Forest Service ("NFS"), it will do so. Because LTD Broadband has not yet determined whether it will traverse lands owned by the NFS with aerial or buried cable, a determination has not yet been made as to where, or what types of permits and/or easements will be needed to deploy its network. At this time, LTD Broadband has not initiated contact with the NFS.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 3: Does the RDOF area that LTD intends to serve in western South Dakota include areas within Custer State Park? If so, specify:

- a) What permits or easements the State of South Dakota requires prior to construction?
- b) Whether LTD has initiated any communication with the State of South Dakota regarding construction in Custer State Park, and if so, who is LTD's point of contact.

Response: No. The RDOF area that LTD Broadband plans to serve does not include areas within Custer State Park.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 4: Is it necessary for LTD to conduct any cultural resource or environmental studies in South Dakota prior to construction? If so, specify:

- a) What studies must be done?
- b) What government agency or tribal entity requires a study and provide the point of contact at said agencies?

Response: At this time, it is unknown whether it will be necessary for LTD Broadband to conduct any cultural resource or environmental studies in South Dakota prior construction of its network.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5: As a result of the planned construction on the Rosebud Sioux Tribe Reservation, has LTD engaged in consultation with the Tribe? If so, describe what has been done and provide LTD's point of contact with the Tribe.

Response: LTD Broadband's tribal liaison has initiated contact with the Rosebud Sioux Tribe Reservation for purposes of consultation. However, LTD Broadband does not yet have a point of contact at the Reservation.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 6: Provide a map demonstrating the location of towers and the fiber backhaul planned for construction in SD.

Response: LTD Broadband objects to SDTA's Request 6 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 specific locations of LTD Broadband's towers and fiber backhaul planned for construction in South Dakota does not bear on LTD Broadband's status as a common carrier, nor is such information needed to identify the services LTD Broadband will provide in South Dakota, or the manner in which those services will be advertised. Additionally, the technical capabilities of LTD Broadband's proposed network in South Dakota will be extensively reviewed by the FCC as part of the RDOF application process. Should the Commission determine that such information is relevant to its review of LTD Broadband's request for an ETC designation in this docket, a complete copy of LTD Broadband's long-form RDOF application was submitted to Staff, subject to a request for confidential treatment.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 7: Did tree cover in the Black Hills area impact planned tower placement? If so, describe how.

Response: LTD Broadband objects to SDTA's Request 7 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 specific locations of LTD Broadband's towers and fiber backhaul planned for construction in South Dakota does not bear on LTD Broadband's status as a common carrier, nor is such information needed to identify the services LTD Broadband will provide in South Dakota, or the manner in which those services will be advertised. Additionally, the technical capabilities of LTD Broadband's proposed network in South Dakota will be extensively reviewed by the FCC as part of the RDOF application process. Should the Commission determine that such information is relevant to its review of LTD Broadband's request for an ETC designation in this docket, a complete copy of LTD Broadband's long-form RDOF application was submitted to Staff, subject to a request for confidential treatment.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 8: In discovery answers provided to PUC Staff, LTD wrote: “Fiber will be utilized to deliver all last mile connections...”

- a) Based upon this statement, it is true that all South Dakota, LTD consumers in RDOF areas will be served by fiber run directly to the consumer’s premises?

- b) If not, specify what was intended by the answer LTD provided the PUC Staff.

Response: All customers of LTD Broadband within the service area for which LTD Broadband obtains RDOF support will be served by fiber run directly to the customer’s premises.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 9: In discovery answers provided to PUC Staff, LTD wrote: “Fiber will be utilized to deliver over 99% of all long-haul network miles.”

- a) Was the 99% figure intended to describe the LTD infrastructure planed in SD, or was the figure intended to describe LTD’s nationwide infrastructure plan?
- b) How many miles of long-haul fiber network will be constructed in South Dakota?
- c) If LTD plans to use wireless technology for its long-haul network in South Dakota, indicate where and why wireless technology will be used versus fiber.

Response: The above-referenced statement made by LTD Broadband to Commission Staff describes LTD Broadband’s nationwide infrastructure plan. It is unknown, at this time, how many miles of fiber will be constructed by LTD Broadband in South Dakota, or whether, where, and to what extent LTD Broadband will use wireless technology (in lieu of fiber), in its network.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 10: In discovery answers provided to PUC Staff, LTD wrote: “Any and all wireless transport links will be engineered to provide 99.999% reliability.” What does that figure mean to the consumer? Quantify the outages that consumers can expect.

Response: The above-referenced statement made by LTD Broadband to Commission Staff means that a customer of LTD Broadband can expect no more than 5.26 minutes of down time per year, and no more than 864.00 milliseconds of down time per day.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 11: When does LTD intend to staff its McLaughlin, Rapid City and Rosebud locations?

- a) Will the Rosebud location be situated within Indian Country?
- b) How many staff people will work at the listed locations?
- c) Based upon LTD's response to Discovery Request 2, Item 9(e) it appears staffing/employee plans regarding how to serve South Dakota RDOF customers has not been developed and LTD has nothing to produce at this time. Is this correct? If so, when will plans be available?
- d) If LTD has developed staffing plans, demonstrate how LTD will meet the requirements in ARSD 20:10:33:08.

Response: As required by ARSD 20:10:33:08, LTD Broadband will employ prudent management and engineering practices so that sufficient equipment and adequate personnel are available at all times, including busy hours, to respond to network and customer service problems. All information available, to date, with respect LTD Broadband's customer service plans was provided to SDTA in response to SDTA's Second Discovery Requests (No. 9). Because superior customer service can be provided remotely, as effectively as in person, the precise number of individuals staffed at each of LTD Broadband's customer service locations in South Dakota is not relevant to LTD Broadband's readiness or ability to comply with ARSD 20-10:33:08.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 12: Provide the “reasonable provisions” that LTD has in place pursuant to ARSD 29:10:33:17.

Response: LTD will maintain generators and portable solar arrays to extend battery performance in the event of any power service failure or other emergency. Because LTD Broadband plans to construct 3-10x standard capacity usage, sudden and prolonged increases in traffic are not likely to occur.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 13: On page 11 of its ETC application, LTD wrote: “Upon activation of a customer, LTD Broadband will provide the customer with a notification containing clear instructions on the use of emergency services.”

Provide a copy of the “notification containing clear instructions” that LTD will provide to its customers.

Response: To access emergency services, customers of LTD Broadband will be instructed to dial the numbers “9-1-1” on any in-service telephone, and to remain on the line to speak with a dispatcher.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 14: Has LTD relinquished any of its RDOF areas, in any state? If so, specify where and why.

Response: No. LTD Broadband has not relinquished any RDOF service area.

Date: June 30, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Third Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 15: Does LTD plan to relinquish any of its RDOF areas, in any state? If so, please specify where and why.

Response: No. LTD Broadband does not plan to relinquish any RDOF service area.

Dated: June 30, 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 Third Discovery Request were served electronically to the Parties listed below, on this 30th day of June, 2021:

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/s/ Brett Heather Freedson

Brett Heather Freedson

**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.

Date: August 6, 2021

**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 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.

Date: August 6, 2021

**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 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.

Date: August 6, 2021

**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 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

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-1: Regarding LTD's experience with Fiber to the Premises (FTTP) networks:

- (a) What is the largest Fiber to the Premises (FTTP) network that LTD has deployed in terms of numbers of customers currently being served by fiber?
- (b) What technology does this FTTP network use? (GPON, EPON, etc.)
- (c) Where is this FTTP network located?

Response:

- (a) The largest FTTP network currently operated by LTD Broadband serves 448 customers.
- (b) The FTTP network referenced in response to (a) above uses GPON.
- (c) The FTTP network referenced in response to (a) is located in Tennessee.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-2: How many locations is LTD currently able to serve with its deployed FTTP systems (mainline fiber within 500 feet of location)?

Response: LTD Broadband currently is able to serve over 2,500 with its deployed FTTP systems.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-3: Describe the experience LTD has in obtaining federal and tribal permits as part of a fiber installation project.

Response: LTD Broadband does not have relevant experience to describe in response to this Request.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-4: How many miles of fiber construction planned by LTD in South Dakota will be aerial?
Buried?

Response: LTD Broadband has not yet determined which portions of its fiber network in South Dakota will be aerial, and which portions will be buried. Therefore, the information requested is not available at this time. Such determinations will be made after LTD Broadband's application for RDOF support is approved by the FCC.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-5: How many bucket trucks does LTD currently have for maintenance of aerial fiber cable?
Or how does LTD intend to maintain aerial fiber?

Response: LTD Broadband owns 7 bucket trucks.

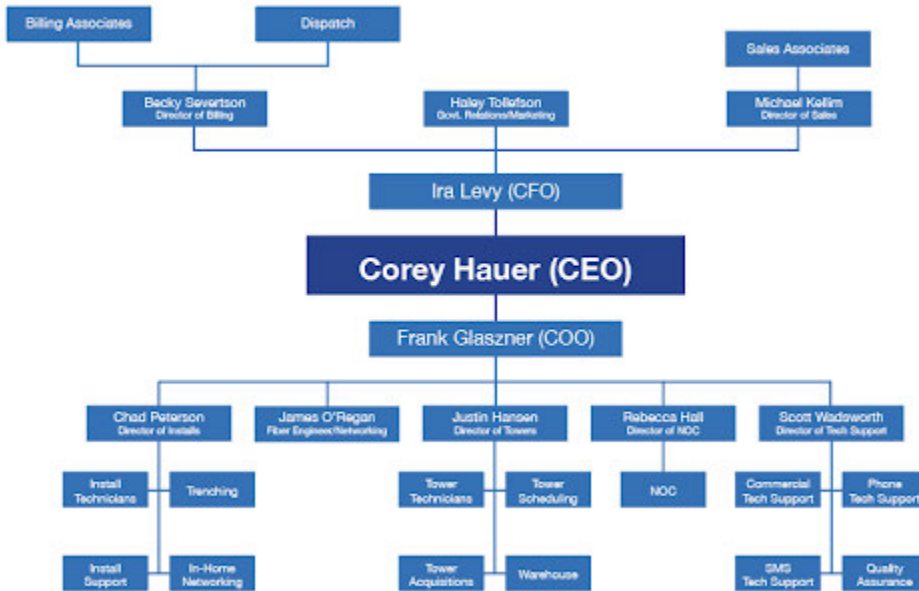
Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-6: Provide an Organizational Chart of LTD’s Management Team.

Response: An organizational chart of LTD Broadband’s management team is provided below.



Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-7: Provide the resume of the licensed professional engineer (Roy Glenn) showing his experience engineering broadband networks similar to what is planned for South Dakota.

Response: The current resume of P.E. Roy Glenn is provided below:

Roy Glenn P.E.-Senior Engineer

Roy has been with Fail Engineering since December of 2017 and has taken the place of Senior Engineer for Randall Bowman who retired after 30 years with the company. Roy brings a multitude of different experiences and disciplines from the various projects he has worked on. He has successfully completed as project manager over 75 million dollars' worth of Fiber to the Premise projects in the last three plus years. He graduated from the Aerospace Engineering College at Mississippi State University. His first job upon graduating was with Boeing Aircraft Company, where he worked on testing and design for the Saturn Missile Booster. After this project was successfully completed he went to work for the Lockheed Aircraft in Marietta, Georgia. After completion of these projects he returned to Mississippi and work for several companies as an electrical engineering, including some time working at Dixie Electric on electrical transfer power systems. After this Roy worked for a number of years with MDOT as a civil engineer. His work included state highways and bridges for computing load limits, design including I-10 interstate. After this Roy set up his own engineering business specializing in potable water systems, sewage systems, and storm water control systems. From this time Roy acquire a wealth of experience working with underground systems involving, trenching and directional boring construction methods in right-of way and private easements. He has designed and inspected many of underground systems.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-8: Provide Roy Glenn's professional engineering license number for the state of South Dakota.

Response: As indicated in the P.E. Certification provided to SDTA as part of LTD Broadband's RDOF materials, Mr. Glenn is a licensed P.E. in the State of Wisconsin. Additionally, Mr. Glenn is a member of the NCEES, and is currently licensed in 16 states.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-9: Provide all quality-of-service filings against LTD to any state utility commission in last 5 years.

Response: No quality of service filing against LTD Broadband has been made with any state utility commission within the last 5 years.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-10: Provide outage reports for the last 5 years.

Response: LTD Broadband currently is not required to produce or maintain outage reports in any state in which it operates. Therefore, the information requested by SDTA is not available. If, and to the extent that such reports are required under the FCC's rules for RDOF fund recipients, or in connection with LTD Broadband's ETC status and/or COA for South Dakota, LTD Broadband will comply with the requirements of applicable law.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-11: Provide a list of customer complaints for the last 2 years.

Response: SDTA’s Request for a list of “customer complaints” is overly broad. It would be unduly burdensome for LTD Broadband to produce a complete list of customer complaints that it received within the last 2 years, as customers may deliver complaints to LTD Broadband by informal means, such as telephone, text, or email. LTD Broadband does not track each and every complaint that it receives – particularly to the extent that a complaint is immediately resolved to the satisfaction of the customer by LTD Broadband’s customer service representative. LTD Broadband has not been the subject of any customer complaint filed with a state commission within the past two (2) years.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-12: How many total mainline miles of fiber cable does LTD plan to install in South Dakota?

Response: LTD Broadband has not yet determined how many miles of fiber cable it will deploy in South Dakota. Therefore, the information requested is not available at this time. Such determinations will be made after LTD Broadband's application for RDOF support is approved by the FCC.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-13: How many FTTP subscribers will be supported over each fixed microwave middle-mile link?

Response: LTD Broadband currently does not plan to use fixed microwave links in its middle-mile network.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-14: With regard to any wireless links planned for the middle mile network:

- a. What is the maximum distance LTD is proposing for these links?
- b. What frequency band will be used?
- c. What channel bandwidths will be used?
- d. What are the planned oversubscription ratios for these links?
- e. Does LTD plan to construct new towers? If so, how many?
- f. Will outdoor units or split systems be utilized?

Response: LTD Broadband currently does not plan to use fixed microwave links in its middle-mile network.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-15: Describe the diverse routing and redundancy of the middle mile network (wireless and fiber).

Response: LTD Broadband will use resilient Ethernet rings feeding GPON nodes to provide diverse routing an redundancy to its middle-mile network.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-16: Describe the redundancy planned for the Core network and Internet Connection Point.

Response: LTD Broadband will use resilient Ethernet rings feeding GPON nodes to provide redundancy within its Core network, and at its Internet Connection Point.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-17: How will the broadband traffic be backhauled from the various RDOF areas to the Internet Connection Point in Sioux Falls.

Response: LTD Broadband has not yet determined how broadband traffic will be backhauled from its RDOF service areas to its Internet Connection Point in Sioux Falls. Therefore, the information requested is not available at this time. LTD Broadband will make specific determinations about its backhaul plans after its application for RDOF support is approved by the FCC.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-18: How many customers does LTD anticipate in South Dakota 3 years after FCC award?

Response: LTD Broadband approximates that it will serve 500 customers in South Dakota within 3 years of its RDOF award.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-19: How much investment will LTD have made in South Dakota 3 years after FCC award?

Response: At a minimum, LTD Broadband's investment in South Dakota within the 3 years that follow its RDOF award will be sufficient to meet its obligations under the FCC's RDOF rules.

Date: September 27, 2021

**Matter of Application of LTD Broadband LLC
Docket No. TC21-001**

**Responses of LTD Broadband LLC to
Fifth Discovery Request of South Dakota Telecommunications Association (SDTA)**

Request 5-20: Describe how the broadband investments in South Dakota be financed.

Response: While LTD Broadband has considered both loans and private equity options, it has not made any final determinations with respect to how it will finance its broadband investments in South Dakota.

Date: September 27, 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 Fifth Discovery Request were served electronically to the Parties listed below, on this 27th day of September, 2021:

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