Submitted via email to SDPUC staff
March 12, 2021

Docket Number:	**TC21-003**
Subject Matter:	First Data Request
Request to:	**Valley Communications, Inc. d/b/a Valley FiberCom** (Valley or Company)
Request from:	South Dakota Public Utilities Commission Staff
Date of Request:	March 1, 2021
Responses Due:	March 15, 2021

Valley received the SDPUC Staff data request in the above docket and hereby provides the following responses. Please note, this SDPUC ETC Application will be amended and updated from Valley Communications, Inc dba Valley FiberCom to Valley Telecommunications Cooperative Association Inc. **The Valley representative responsible for each response below is:**

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1-1. Please identify each census block located in a rural service area, if any.

Response:

As a part of its filing, Valley provided Exhibit A which indicates the census blocks Valley is seeking ETC designation in as well as a visual depiction of these locations on a map. These census blocks are all located in CenturyLink service areas and not any RLEC areas.

1-2. Valley states in its application that customers will have access of up to 1 GB speeds and its existing FTTP technology is capable of delivering up to 1 GB symmetrical service. What speeds do existing customers currently have? If every customer wanted to receive 1 GB service, would they be eligible?

Response:

Valley currently provides service packages ranging from symmetrical 50 Mbps download and upload speeds to 1 Gbps. In all its current service areas, customers can receive any of these packages including up to 1 Gbps. FCC RDOF buildout rules require the speed tier bid to be available to 70% of all customers at any one time. Valley's network will be designed to meet this requirement.

1-3. Is Valley limited to running fiber to locations currently unserved within the RDOF-awarded census blocks? Or, can Valley provide service to any location within each RDOF-awarded census block?

Response:

Pursuant to RDOF requirements, upon full buildout Valley will be able to provide service of 1 Gbps speed within 10 business days of any current or future location customer request within the RDOF-awarded census blocks.

1-4. Provide a plan to provide the proposed service in South Dakota, including a timeline.

Response:

Attached as Exhibit B is the network design plan for Valley. Valley will meet all FCC buildout deadlines in 47 CFR 54.802(c). The industry is currently experiencing unprecedented challenges in FTTP network construction, including COVID-19 related supply chain shortages that cause increased delivery times for materials and some labor shortages due to the strong and growing demand for contractors given the increased state and FCC funding for broadband during the pandemic. Therefore, Valley's established project schedule may need to be adjusted to accommodate any challenges that arise; however, Valley's intended schedule is attached as Exhibit C and it identifies the anticipated project phases to complete the buildout within 6 years.

Valley will deploy a fiber to the premises (FTTP) network architecture. The fiber optic cable infrastructure will be designed in a manner that permits Valley to implement a Gigabit Passive Optical Network (GPON) or various other next-generation technologies. For its initial implementation, Valley intends to deploy GPON technology over a Calix E7 platform.

The proposed FTTP network architecture allows for the delivery of voice and data services across the broadband access platform. Valley will utilize redundant Ethernet uplinks from the proposed FTTP electronics to its existing Ribbon C15 softswitch to facilitate voice services. While the existing softswitch has the necessary connections to the public switched telephone network (PSTN) for the voice services implementation, Valley will complete any interconnection work and associated call translations to ensure proper availability of voice services. In addition, Valley will utilize redundant Ethernet uplinks to its existing core data network to provide high availability of Internet services. The existing redundant connections to upstream Internet service providers will ensure that Valley's broadband service will provide the highest quality experience to its customers.

The FTTP technology utilized by Valley enables the service provider to provision broadband data speeds to individual users in increments of 1 Mbps. This functionality allows Valley to provide a wide variety of data rates up to 1 Gbps to each location within the eligible census blocks. Based on the speed at which light travels through fiber optic cable, the latency introduced by the last-mile fiber optic cable plant is calculated to be less than 0.1 milliseconds assuming a 20-kilometer fiber distance from the customer to the central office FTTP electronics. In addition, the FTTP electronics vendor selected by Valley has indicated the latency through its GPON solution is less than 1 millisecond in both the upstream and downstream directions.

1-5. Provide all RDOF applications Valley made to the FCC regarding the census blocks identified in Exhibit A.

Response:

Valley made only one RDOF application, as a part of the Rural American Broadband Consortium. Valley's RDOF Long Form is attached as Exhibit C. Valley has not made any additional applications to the FCC regarding the census blocks in Exhibit A.