

Docket Number: TC21-115  
Subject Matter: First Data Request  
Request to: Fiber Ring Revenue-Pooling Association (FRRPA)  
Request from: South Dakota Public Utilities Commission Staff  
Date of Request: October 15, 2021  
Responses Due: October 29, 2021

PUBLIC REDACTED

- 1-1. Refer to Confidential Exhibit 7 – Revised Exhibit C to RUL Agreements. Explain the basis for and provide supporting workpapers for the new 100 GigE Port Charge.

**Response:** The 100 GigE port charge is the next step in the evolution of rates for the FRRPA backbone. RUL interfaces have grown from 100 Mbps (Fast E) to 1,000 Mbps (GigE) to our widely deployed 10 GigE interfaces. Numerous RULs use multiple 10 GigE interfaces to support the various traffic classes and the exchange of spare capacity traffic with SDN. There is often a cross over point (between two and four 10 GigE ports) when multiple 10 GigE ports can no longer efficiently support the traffic of an RUL. A failure of a single port can create queuing, jitter, latency and packet loss eroding the performance of network and impact the transfers of critical data streams. 2020 and 2021 saw the introduction of 100 GigE transport links across the FRRPA network, 2021 has brought the need to terminate such capacity into RULs thus facilitating the need for this new element.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- 1-2. Confirm there is a separate RUL Agreement for each individual LEC and provide any items that differ from Confidential Exhibit 5 other than the company name. If necessary, provide copies of each agreement to show the differences.

**Response:** FRRPA confirms there is a separate RUL Agreement for each FRRPA member. No items differ, other than company name.

- 1-3. Confirm there is a separate SRP Agreement for each individual LEC and provide any items that differ from Confidential Exhibit 4 other than the company name. If necessary, provide copies of each agreement to show the differences.

**Response:** FRRPA confirms there is a separate SRP Agreement for each FRRPA member. Historically and in the current Confidential Exhibit 4, Exhibits 1 and 2 to the SRP Agreements have been unique to each company, based on each company's network contributions to FRRPA. However, since the rates and the application of the rates are consistent for all SRP Agreements, FRRPA seeks to revise Exhibits 1 and 2 of the SRP Agreements to reflect applicable rates. Please see attached Confidential Exhibit 1-3 with the proposed new Exhibits 1 and 2 to the SRP Agreements. Utilization of the new Exhibits 1 and 2 will result in all Exhibits to the SRP Agreements being consistent for all companies (consistent with the Exhibits to the RUL Agreements) and will eliminate the need to revise each company's Exhibit(s) when network changes/upgrades are made in the rings.<sup>1</sup>

- 1-4. In addition to the redline versions provided, provide clean versions of each Exhibit.

**Response:** Clean versions of all red-lined documents are attached, as follows:

1. Exhibit 1-4 A Restated Articles of Incorporation
2. Confidential Exhibit 1-4 B Amended Bylaws
3. Confidential Exhibit 1-4 C SRP Agreement
4. Confidential Exhibit 1-4 D RUL Agreement
5. Confidential Exhibit 1-4 E Exhibit C to RUL

---

<sup>1</sup> The originally filed Exhibits 1 & 2 to the SRP Agreement are confidential, as are the proposed revised Exhibits 1 and 2 that are attached to Confidential Exhibit 1-3 of this Response. Red lined and clean versions are included in Confidential Exhibit 1-3.