

**Docket Number:** TC22-030  
**Subject Matter:** First Data Request  
**Request to:** RT Communications, Inc  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** 6/27/22  
**Responses Due:** 7/12/22

1-1. What percentage of RT customers in South Dakota have access to fiber?

**Response:** When construction is completed in 2022, 100% of RT's customers in South Dakota will have access to fiber to the premise (FTTP) services. Currently about 5% of customers have access to FTTP.

1-2. Explain why RT is asking for certification in South Dakota when the home state study area code is not a South Dakota study area code.

**Response:** RT has been requesting and receiving annual ETC recertifications from the SDPUC for many years. It has been our understanding that the SDPUC has desired to have state oversight of the universal service requirements for RT for the portion of its network in South Dakota. With recent changes to the certification methodology at USAC, RT contemplated not seeking ETC certification in South Dakota this year and simply relying on the application process of its home state of Wyoming. However, RT wanted the SDPUC to have an opportunity to see that RT is fulfilling its commitment to provide FTTP throughout its exchange area in South Dakota. This has been the topic of data requests and Commissioner inquiries in previous years. Given that RT's FTTP buildout in South Dakota will be completed in 2022 and that RT will be using universal service support in future years solely for the maintenance and upgrading of supported facilities and services, subject to concurrence by the SDPUC, RT proposes not seeking ETC recertification from the SDPUC in future years but instead including South Dakota customers in RT's recertification from the Wyoming PSC. If requested by the SDPUC, RT is willing to submit its Wyoming annual recertification filing to the SDPUC for informational purposes.