

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Petition of LTD  
Broadband LLC to Expand Its Designation as  
an Eligible Telecommunications Carrier

ISSUE DATE: June 3, 2021

DOCKET NO. P-6995/M-21-133

In the Matter of a Notice to Rural Digital  
Opportunity Fund Grant Winners

DOCKET NO. P-999/CI-21-86

ORDER APPROVING PETITION FOR  
ETC DESIGNATION IN CERTAIN  
CENSUS BLOCKS

**PROCEDURAL HISTORY**

In 2020, the Federal Communications Commission (FCC) established the Rural Digital Opportunity Fund (RDOF), a grant program that will provide up to \$20.4 billion over a 10-year period to bring high-speed broadband networks to unserved and underserved areas.<sup>1</sup> RDOF is part of the FCC's Universal Service Fund, a group of programs designed to advance universal access to telecommunications and information services for low-income consumers and those in rural, insular, and high-cost areas. RDOF grants will be distributed in two phases. Phase I will target census blocks that are wholly unserved by fixed voice and broadband with at least 25 megabits-per-second download speed and 3 megabits-per-second upload speed. Phase II will fund unserved locations within partially served census blocks.

To select recipients of RDOF Phase I grants, the FCC reviewed short-form applications concerning the applicants' technical and financial ability to provide the requisite services if awarded support, and conducted an auction in which applicants bid on the right to offer RDOF-supported service to designated census blocks (auction 904).<sup>2</sup>

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<sup>1</sup> See *In the Matter of Rural Digital Opportunity Fund*, WC Docket No. 19-126, Report and Order, FCC 20-5, ¶ 5 (January 30, 2020) (RDOF Order).

<sup>2</sup> *Id.*, ¶¶ 69–85; *id.*, ¶¶ 18, 31.

On December 7, 2020, the FCC announced the results of auction 904.<sup>3</sup> The winning bidders included 24 companies selected to receive \$408,150,745.60 to deploy high-speed broadband to 142,841 assigned locations in Minnesota.<sup>4</sup>

Winning bidders were required to submit long-form applications with more information on their qualifications and their plans to use awarded support to meet RDOF obligations.<sup>5</sup> Additionally, by June 7, 2021, a winning bidder must certify and provide documentation that it is an eligible telecommunications carrier (ETC) in each area for which it seeks support.<sup>6</sup> If the FCC approves the long-form application, the applicant will be authorized to begin receiving support.

On February 2, 2021, the Commission issued a notice requiring RDOF auction winners to file ETC petitions by February 19, and inviting initial comments on the petitions by March 19.

On February 17, 2021, LTD Broadband LLC (LTD) filed a petition to expand its ETC designation to include census blocks for which it was a winning bidder for RDOF support.

On March 26, 2021, the Department of Commerce (the Department) and the Office of the Attorney General—Residential Utilities Division (OAG) filed comments recommending that the Commission adopt certain additional requirements and approve LTD’s petition.

Also on March 26, 2021, Paul Bunyan Rural Telephone Cooperative (Paul Bunyan) and the Minnesota Telecom Alliance filed comments recommending denial of LTD’s petition.

On April 12, 2021, LTD, OAG, and the Department filed reply comments.

On May 13, 2021, the Commission met to consider the matter.<sup>7</sup>

## FINDINGS AND CONCLUSIONS

### I. LTD’s Petition

LTD currently operates in Minnesota as a provider of broadband internet service. It does not hold a certificate of authority to provide local exchange telephone service in Minnesota.

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<sup>3</sup> See *In the Matter of Rural Digital Opportunity Fund*, WC Docket No. 19-126., Public Notice, Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, DA 20-1422, ¶¶ 17, 36 (December 7, 2020) (Winning Bidder Announcement).

<sup>4</sup> See Winning Bidder Announcement at Attachment A: Winning Bidders Summary and Attachment B: State Results Summary.

<sup>5</sup> RDOF Order, ¶¶ 86–91.

<sup>6</sup> 47 C.F.R. §§ 54.803(a), 54.804(b)(5).

<sup>7</sup> The May 6, 2021 meeting included discussion of issues applicable to all ETCs in Docket No. P-999/CI-21-86. LTD’s individual ETC petition was considered at the May 13, 2021 meeting.

LTD was designated as an ETC in 288 Minnesota census blocks in 2019.<sup>8</sup> It was a winning bidder in the FCC's auction for Phase II of the Connect America Fund (CAF), a universal service support program similar to RDOF that funds broadband deployment in certain underserved rural areas. Federal rules required LTD to obtain ETC designation to receive CAF Phase II support.

In its current petition, LTD requests to expand its ETC-designated service area to include an additional 950 census blocks designated to receive RDOF support, listed in Exhibit 1 to LTD's petition. If it meets the applicable requirements, LTD will receive \$311,877,936.40 in RDOF support over a 10-year period to bring broadband to 102,005 Minnesota locations.

In its petition, LTD stated that it will meet the voice telephony requirements of 47 C.F.R. § 54.101(a) by offering voice over internet protocol (VoIP) services including voice grade access to the publicly switched telephone network. LTD stated its intent to comply with requirements pertaining to free local usage minutes, access to emergency services, and toll limitation for low-income customers. Additionally, LTD stated that it would advertise the availability of supported services throughout its service areas using media of general distribution in a manner designed to reach those likely to qualify for such services.

LTD's petition included a summary of its plan to remain functional in emergencies and a commitment to meet all consumer-protection and service-quality standards set forth in 47 C.F.R. § 54.202(a)(3), as well as all applicable state consumer-protection and service-quality standards.

LTD argued that its ETC designation will serve the public interest by allowing LTD to accept federal support to expand rural Minnesotans' access to innovative communications technology including interconnected VoIP and fiber-optic broadband. Further, LTD argued that its RDOF-supported offerings will provide rural Minnesotans a variety of service options at competitive rates and incentivize innovation and improvement in existing broadband and voice networks, thereby improving service quality for previously underserved communities.

## **II. Requirements for ETC Designation**

In the federal Communications Act of 1934, Congress delegated to state commissions primary authority to designate carriers subject to their jurisdiction as ETCs eligible to receive federal universal service support.<sup>9</sup> State determinations regarding eligibility for federal universal service support are governed by 47 U.S.C. §§ 214 and 254 and by the FCC's universal service rules codified at 47 C.F.R. part 54.

47 U.S.C. § 214(e)(2) directs a state commission to designate a common carrier that meets the requirements of 47 U.S.C. § 214(e)(1) as an ETC for a designated service area. To be eligible under paragraph (1), a carrier must offer the services supported by universal-service-support mechanisms under 47 U.S.C. § 254(c), either using its own facilities or a combination of its own and another carrier's resold services, and it must advertise the availability of and charges for those services. The requisite services are stated in 54 C.F.R. § 54.101 and include voice

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<sup>8</sup> *In the Matter of LTD Broadband LLC's Petition for Eligible Telecommunications Carrier Designation in Minnesota*, Docket No. P-6995/M-18-653, Order Approving Request for ETC Status for High Cost Support in Certain Census Blocks (February 8, 2019).

<sup>9</sup> 47 U.S.C. § 214(e)(2).

telephony services, which must provide voice grade access to a publicly switched network or its functional equivalent, local minutes at no additional charge, toll limitation to low-income consumers, and 911 emergency services.<sup>10</sup> VoIP services are voice telephony services eligible for federal universal service support.<sup>11</sup>

Before designating an additional ETC for an area served by a rural telephone company, the Commission must find that the designation is in the public interest.<sup>12</sup>

A state may adopt additional regulations to preserve and advance universal service within the state, but such state regulations must not be inconsistent with the FCC's rules.<sup>13</sup> If a state adopts additional definitions and standards for universal service, it must also adopt "specific, predictable, and sufficient mechanisms to support such definitions or standards that do not rely on or burden Federal universal service support mechanisms."<sup>14</sup>

### **III. Comments**

#### **A. The Department**

The Department analyzed LTD's petition, concluded that it met the criteria, and recommended that the Commission approve LTD's petition for ETC designation in the designated census blocks subject to the conditions established by the Commission for all ETCs.

Additionally, the Department recommended that the Commission adopt, and impose on all ETCs, consumer protections beyond the federal requirements to receive universal service support. The Department proposed a list of 19 consumer protections<sup>15</sup> which, through existing state statutes and rules, currently apply to Minnesota-certificated carriers in the areas where they operate as incumbent or competitive local exchange carriers.<sup>16</sup> The Department noted that LTD agreed to comply with state consumer-protection rules, and it recommended that the Commission accept that representation for purposes of the current ETC-designation petition.

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<sup>10</sup> *Id.* § 214(e)(1)(A); 47 C.F.R. §§ 54.101(a)–(b), 54.201(d)(1).

<sup>11</sup> *In the Matter of LTD Broadband LLC's Petition for Eligible Telecommunications Carrier Designation in Minnesota*, Docket No. P-6995/M-18-653, Order Approving Request for ETC Status for High Cost Support in Certain Census Blocks, at 4 (February 8, 2019); *see In the Matter of Connect America Fund et al.*, WC Docket No. 10-90., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, ¶ 64 (November 18, 2011); 47 C.F.R. § 54.101(a)(1).

<sup>12</sup> 47 U.S.C. § 214(e)(2).

<sup>13</sup> 47 U.S.C. § 254(f).

<sup>14</sup> *Id.*

<sup>15</sup> Comments of the Minnesota Department of Commerce on the Petitions filed by Rural Digital Opportunity Fund Grant Winners, Attachment 1 (March 26, 2021).

<sup>16</sup> The proposed additional requirements are addressed in separate orders in Docket No. P-999/CI-21-86: Order Approving Petitions for ETC Designation in Certain Census Blocks (May 28, 2021), and Order Approving Petitions for ETC Designation in Certain Census Blocks and Requiring Additional Filings (May 28, 2021). As discussed in those orders, the Commission will issue a notice for comment by July 1, 2021, regarding the state's present and recommended authority and role in overseeing ETCs.

## **B. OAG**

OAG recommended that the Commission approve LTD's petition for ETC designation if the Commission adopts certain additional obligations for all RDOF Phase I ETCs.<sup>17</sup>

## **C. Minnesota Telecom Alliance**

The Minnesota Telecom Alliance, a trade association of Minnesota telecommunications companies, recommended that the Commission deny LTD's petition and consider revoking its existing ETC designation.

Minnesota Telecom Alliance asserted that the Commission should evaluate LTD's ETC eligibility under Minn. R. 7811.1400 and 7812.1400 in addition to FCC rules, and that LTD bears the burden to prove its ability to meet requirements under Minn. Stat. § 237.74, subd. 4, which governs complaint proceedings against telecommunications carriers.

Minnesota Telecom Alliance argued that LTD's statements that it will comply with requirements are insufficient to overcome a negative rating and customer complaints noted on the Better Business Bureau website.

Additionally, Minnesota Telecom Alliance questioned whether LTD would meet requirements of the Lifeline program for low-income customers because LTD had no Lifeline information on its website at that time and did not respond to a notice requesting comments from all ETCs in the Commission's Lifeline inquiry docket.<sup>18</sup>

Minnesota Telecom Alliance argued that granting the petition would harm the public interest because LTD lacks the technical and financial ability to deploy the proposed RDOF-supported service. Noting that it has not been able to review LTD's financial and technical information because it is deemed confidential and proprietary, the trade association argued that there is insufficient evidence LTD has the ability to build and operate its proposed network.

The trade association specifically challenged LTD's ability to offer the proposed broadband with 1 gigabit-per-second download speed and 500 megabits-per-second upload speed (Gigabit service) on the ground that LTD's website did not list Gigabit service as a service-plan option.

Additionally, Minnesota Telecom Alliance stated that LTD had won CAF Phase II support in five states but defaulted on its winning bids in Nebraska and Nevada. The trade association characterized the defaults as a record of failure to fulfill promises and argued that this record indicates an inability to meet RDOF obligations in Minnesota.

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<sup>17</sup> The proposed additional obligations are discussed in separate orders in Docket No. P-999/CI-21-86: Order Approving Petitions for ETC Designation in Certain Census Blocks (May 28, 2021), and Order Approving Petitions for ETC Designation in Certain Census Blocks and Requiring Additional Filings (May 28, 2021). As discussed in those orders, the Commission will issue a notice for comment by July 1, 2021, regarding the state's present and recommended authority and role in overseeing ETCs.

<sup>18</sup> *In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High Cost ETCs*, Docket No. P-999/CI-20-747 (Lifeline inquiry docket), Notice of Comment Period (October 7, 2020).

#### **D. Paul Bunyan**

Paul Bunyan, a local exchange carrier and also a winning bidder of RDOF support in Minnesota, recommended that the Commission deny LTD's petition or, if it grants the petition, condition the ETC designation on LTD's compliance with consumer-protection and service-quality standards and the provision of service to low-income customers.

Paul Bunyan made arguments similar to Minnesota Telecom Alliance's arguments concerning financial and technical ability, Better Business Bureau ratings, CAF Phase II defaults, and Lifeline. Paul Bunyan specifically criticized LTD's failure to advertise Lifeline or voice services on its website despite having accepted CAF Phase II support for such services.

Paul Bunyan also argued that LTD's past requests for waivers or extensions to file certain financial statements and letters of credit in connection with other universal service support programs demonstrate that LTD is unreliable and financially questionable.

Paul Bunyan argued that LTD's promise to comply with applicable state consumer-protection and service-quality rules is ineffectual because such state rules are legally unenforceable against non-certificated providers like LTD.

Additionally, Paul Bunyan objected to a statement in LTD's petition that it "is committed to providing the supported services throughout the Service Area to all customers who make a request for such services *if service can be provided at a reasonable cost by constructing network facilities.*"<sup>19</sup> Paul Bunyan argued that this caveat violates an RDOF-Order requirement that recipients offer service to all eligible homes and small businesses in the awarded census blocks.<sup>20</sup>

#### **E. LTD's Reply**

LTD stated that it would comply with applicable federal and state consumer-protection and service-quality rules, and it did not oppose the Department's and OAG's proposals to adopt consumer protections and other ETC obligations. It argued that its certifications and statements that it will comply with obligations and standards are sufficient to support ETC designation.

LTD disputed Minnesota Telecom Alliance's and Paul Bunyan's allegations about its customer-service record as speculative and unsupported. With respect to the Better Business Bureau, LTD noted that no details were offered regarding the substance of the complaints, and there was no evidence that the number of complaints was excessive or worse than that of other providers. LTD also stated that it had a more favorable rating on another customer review platform.

In response to the assertions that LTD does not yet advertise CAF Phase II-supported voice and Lifeline services, LTD stated that it is not yet required to have deployed such services under CAF Phase II buildout rules.

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<sup>19</sup> Petition for Expansion as an Eligible Telecommunications Carrier, at 7 (February 17, 2021) (LTD's Petition) (emphasis added).

<sup>20</sup> RDOF Order, ¶ 6.

LTD argued that it reasonably decided to default on its Nebraska and Nevada CAF Phase II bids because it had won only a single census block group in each of those states and it would not have been economically prudent to accept support for such small areas given the cost of compliance.

LTD contended that the evaluation of an applicant's financial and technical ability to meet RDOF requirements is exclusively in the FCC's jurisdiction, and that any consideration of such matters for purposes of ETC designation would exceed this Commission's authority under 47 U.S.C. § 214(e)(2). Moreover, LTD argued that commenters' assertions about its size and capabilities rely on speculative, incorrect, and incomplete information, insufficient to outweigh the FCC's careful scrutiny of LTD's complete long-form application materials.

#### **F. OAG's Reply**

OAG disagreed with Minnesota Telecom Alliance's assertion that the petition should be evaluated under Minn. R. 7811.1400 and 7812.1400, stating that those rules govern certificated local exchange carriers but do not apply to LTD as a non-certificated provider of broadband and VoIP services. Additionally, OAG stated that the Minn. Stat. § 237.74 burden of proof does not apply to non-certificated companies and does not apply in this ETC-petition proceeding, or in any context other than a complaint proceeding brought under Minn. Stat. § 237.74.

OAG argued that the compliance statements in LTD's petition are sufficient to grant the requested ETC designation and that participants' claims about LTD's inability to fulfill RDOF obligations rely on speculative, incomplete information that does not warrant denial. OAG argued that the record before the Commission is insufficient to support a denial of LTD's petition for financial reasons; rather, the FCC's rigorous review process, including the long-form application with complete financial and technical information and a letter-of-credit requirement, is the proper venue to evaluate such concerns.

Further, OAG argued that there is insufficient evidence to deny LTD's ETC petition based on consumer-protection or service-quality concerns. OAG recommended requiring all RDOF Phase I ETCs to comply with certain obligations to protect consumers but noted that LTD had agreed to comply with state consumer-protection and service-quality standards in its petition.

Additionally, OAG argued that the Commission should not deny LTD's ETC petition due to the lack of Lifeline information on LTD's website because that issue is being addressed in the Commission's Lifeline inquiry docket and compliance will be revisited in the next ETC recertification docket.<sup>21</sup>

#### **G. The Department's Reply**

The Department, like OAG, asserted that Minn. R. 7811.1400, Minn. R. 7812.1400, and Minn. Stat. § 237.74 do not apply to LTD's petition. The Department stated that the allegations about LTD's financial and technical abilities are concerning but that the FCC vets those matters when it reviews RDOF applications. The Department argued that the Commission lacks sufficient

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<sup>21</sup> *In the Matter of the Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of Federal Universal Service Support Required Pursuant to 47 C.F.R. § 54.313*, Docket No. P-999/PR-21-8, Notice of Compliance Filing Period (May 25, 2021). ETCs are required to file for recertification of their eligibility each year. *See* 47 C.F.R. § 54.314(a).

information to consider financial or technical abilities because it did not require applicants to submit their RDOF long-form applications with their petitions for ETC designation.

Although it did not recommend denying the ETC petition for failure to advertise Lifeline service at this time, the Department recommended requiring all ETCs to post Lifeline information on their websites no later than the first offering of any ETC service to a consumer.

#### **IV. Commission Action**

##### **A. ETC Designation**

The Commission agrees with OAG's and the Department's analyses of LTD's eligibility to receive federal universal service support in the designated areas. The Commission finds that LTD meets the requirements for ETC designation set forth in 47 U.S.C. § 214(e)(1). LTD's petition contains the requisite commitments that it will offer and advertise the supported services required under paragraph (1) as specified in 47 C.F.R. § 54.101.

Further, the Commission finds that the requested ETC designation is in the public interest because it will allow LTD to accept \$311,877,936.40 in federal support to bring high-speed broadband and voice service to 102,005 locations, connecting previously unserved or underserved Minnesotans to fast, reliable service. These developments will advance the state's policy goals to bring high-speed broadband access to all Minnesota homes and businesses and to support universal service, encourage efficient deployment of infrastructure, and promote customer choice with respect to telecommunications services.<sup>22</sup>

47 U.S.C. § 214(e)(2) directs a state commission to designate as an ETC a provider that meets the above criteria. Accordingly, having found that the criteria are met, the Commission will approve LTD's petition for ETC designation in the census blocks listed in Exhibit 1 of its petition. The Commission will delegate authority to the Executive Secretary to issue notices or letters as necessary to communicate with the FCC or other entities regarding LTD's ETC status.

The Commission acknowledges participants' concerns about LTD's ability to deploy the proposed services and meet all RDOF requirements. However, the record currently before the Commission does not contain evidence sufficient to disprove the certifications in LTD's petition or otherwise support a finding of failure to meet any of the ETC-designation criteria. Therefore, the record does not support denying the requested ETC designation and, thus, precluding LTD from receiving RDOF support for Minnesota locations.

Nor does the record developed to date contain evidence of disputed factual or legal issues sufficient to warrant a contested case regarding the question currently before the Commission.

The FCC's RDOF application process examines applicants' ability to meet RDOF obligations, including a review of financial and technical information and other long-form application materials that are not in the record before this Commission. The present decision to expand LTD's ETC-designated service area does not affect any obligation LTD has to demonstrate its

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<sup>22</sup> Minn. Stat. §§ 237.011, 237.012.

financial and technical ability, or any requirement for RDOF support other than ETC designation, to the FCC's satisfaction.

Furthermore, LTD and its ETC status remain subject to this Commission's ongoing authority to oversee compliance pursuant to 47 U.S.C. §§ 214(e)(2) and 254(f), the FCC's universal service rules codified at 47 C.F.R. part 54, and applicable FCC orders and auction materials. To maintain eligibility in Minnesota, LTD must adhere to all federal requirements for RDOF and universal service support. As LTD proceeds with its plans to build out infrastructure and deploy services using federal support, the Commission will exercise its ongoing oversight authority to monitor LTD's compliance as appropriate.

## **B. Compliance Filings**

As a starting point to facilitate the Commission's exercise of the ongoing oversight discussed above, the Commission will require LTD to submit certain information in addition to the annual recertification filings required of all ETCs.

First, LTD asserted in its petition that it "is committed to providing the supported services throughout the Service Area to all customers who make a request for such services *if service can be provided at a reasonable cost by constructing network facilities.*"<sup>23</sup> However, the RDOF Order states that recipients will be required to offer service to all eligible homes and small businesses within the awarded areas.<sup>24</sup> The Commission will require LTD to explain this statement from its petition and how it complies with the RDOF Order. LTD shall file a written explanation in Docket No. P-6995/M-21-133 within 10 days.

Additionally, Minnesota residents and businesses located in the areas designated to receive RDOF support will likely have questions regarding when supported services will become available and what services they can expect to be offered. To enable the Commission's Consumer Affairs Office and other state agencies to answer consumer questions regarding service expectations, the Commission will require LTD to file a written statement within 10 days explaining when LTD is required to commence advertising and providing voice telephony and Lifeline services under the FCC's RDOF Order.

For the same reasons, in its next ETC recertification filing, LTD shall provide a detailed explanation of when, under FCC rules and orders pertaining to CAF Phase II, LTD is required to start offering voice telephony and Lifeline services in connection with CAF Phase II-supported broadband.

At the May 13, 2021 meeting, LTD agreed to comply with these additional filing requirements.

## **ORDER**

1. Based on the record currently before the Commission, the Commission finds that LTD Broadband LLC has met the requirements for ETC designation, and approves LTD's

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<sup>23</sup> LTD's Petition at 7 (emphasis added).

<sup>24</sup> RDOF Order, ¶ 6.

petition for ETC designation in the census blocks listed in its petition, subject to this Commission's ongoing jurisdiction to oversee ETC compliance as set forth in sections 214(e)(2) and 254(f) of the Communications Act of 1934 as amended, the FCC's universal service rules codified at 47 C.F.R. part 54, and the applicable FCC auction materials.

2. So that state agencies and the Commission's Consumer Affairs Office may explain service expectations to customers in the affected census blocks, LTD shall, within 10 days, make a compliance filing that:
  - A. Explains when LTD is legally obligated to commence advertising and providing voice telephony and Lifeline services as required under the FCC's RDOF Order; and
  - B. Explains the comments at page 7 of LTD's petition stating that LTD "is committed to providing the supported services throughout the Service Area to all customers who make a request for such *services if service can be provided at a reasonable cost by constructing network facilities,*" and how that is in compliance with the FCC's RDOF Order, particularly paragraph 6 of the order.
3. In its 2021 ETC recertification filing, LTD shall provide a detailed explanation of when it is obligated under the FCC rules and FCC CAF Phase II orders to commence offering voice telephony and Lifeline services upon deployment of CAF Phase II broadband.
4. The Commission delegates authority to the Executive Secretary to issue notices or letters to the FCC, or to any other entity, if necessary, to facilitate communication of the petitioner's ETC status as designated by this Commission.
5. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



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## **CERTIFICATE OF SERVICE**

I, Chrishna Beard, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission**  
**ORDER APPROVING PETITION FOR ETC DESIGNATION IN CERTAIN**  
**CENSUS BLOCKS**

Docket Number **P-6995/M-21-133, P-999/CI-21-86**

Dated this 3rd day of June, 2021

/s/ Chrishna Beard

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-86_Official
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Eric	Pyland	epyland@team.nxlink.com	AMG Technology Investment Group, LLC	d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087	Electronic Service	No	OFF_SL_21-86_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-86_Official
Jennifer	Richter	jrichter@akingump.com	Akin Gump Strauss Hauer & Feld LLP	2001 K St. NW  Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-86_Official
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300  Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-86_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-133_M-21-133
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300  Washington, DC 20006	Electronic Service	No	OFF_SL_21-133_M-21-133
Gregory	Whiteaker	greg@hermanwhiteaker.com	Herman & Whiteaker, LLC	6720B Rockledge Drive Suite 150 Bethesda, MD 20817	Electronic Service	No	OFF_SL_21-133_M-21-133
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-133_M-21-133