

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

MPUC P-6995/M-21-133
MPUC P-588, P-6995/M-22-221

OAH Case No. 60-2500-38516
Administrative Law Judge:
James E. LaFave

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

MOTION TO INTERVENE

In the Matter of a Petition to Initiate a
Proceeding to Revoke the Expanded
Eligible Telecommunications Carrier
Designation of LTD Broadband LLC and
Deny LTD's Funding Certification for 2023

Institute for Local Self-Reliance,
Proposed Intervenor

1. The applicant, Institute for Local Self-Reliance (ILSR) is a research and advocacy nonprofit organization with offices in Minnesota, focused on building an American economy driven by local priorities. ILSR works with a diverse group of allies, partners, and local communities on policies to improve local Internet access. ILSR represents the interests of local communities that are not necessarily represented by any other part in the proceeding and has a statutory right to intervene pursuant to Minn. R. 1400.6200 (2021).

2. ILSR can provide facts and insight as well as extensive contextual information related to broadband access, funding, and deployment in Minnesota.

3. We recognize the petition against LTD Broadband's expansion in Minnesota as an opportunity to advocate for the public interest and ensure that valuable public dollars are spent in a way that will bring quality, affordable connectivity to communities as soon as possible.

The applicant hereby requests it be allowed to intervene as a party in the above-captioned proceeding.

Dated: September 16, 2022



/s/ Ry Marcattilio-McCracken
Institute for Local Self Reliance
2720 East 22nd Street
Minneapolis, MN 55406

Tel: 320-309-2799
Email: ry@ilsr.org

On September 16, 2022, a true and correct copy of the MOTION TO INTERVENE was served by eService to the following individuals:

First Name	Last Name	Email	Company Name
Kristin	Berkland	kristin.berkland@ag.state.mn.us	Office of the Attorney General-RUD
Andrew	Carlson	acarlson@taftlaw.com	Taft Stettinius & Hollister LLP
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce
Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC
Stephen E	Coran	scoran@lermansenter.com	Lerman Senter
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband
Brett	Heather Freedson	bfreedson@lermansenter.com	Lerman Senter
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett
James	LaFave	james.lafave@state.mn.us	Office of Administrative Hearings
Dan	Lipschultz	Dan.lipschultz@lawmoss.com	Moss & Barnett
Peter E.	Madsen	pmadsen@taftlaw.com	Taft Stettinius & Hollister LLP
Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett

Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.
Gregory	Whiteaker	greg@hermanwhiteaker.com	Herman & Whiteaker, LLC
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA