

# CHIPPEWA COUNTY AUDITOR/TREASURER

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Auditor/Treasurer

June 8, 2022

Minnesota Public Utilities Commission

PUC Docket Number(s): P-6995/M-21-133  
P-559, P6995/M-22-221

**RE: Comment in the Matter of the Petition of LTD Broadband, LLC (LTD) to Expand its Designation as an Eligible Telecommunications Carrier (ETC)**

Chippewa County requests the Minnesota Public Utilities Commission (PUC) to initiate an expedited proceeding to consider the revocation of LTD's expanded ETC designation.

The Federal Communications Commission awarded Rural Digital Opportunity Fund (RDOF) funding to LTD for new and expanded broadband service to unserved and underserved areas in Minnesota, including Chippewa County. The award allows LTD to have up to 10 years to complete the broadband project which eliminates all current and future opportunities for the County to seek other federal or state funding to install fiber for our businesses and residents.

The County conducted a broadband feasibility study in 2017 and at that time, the cost to build broadband in the County was \$15 million. Since then, the cost of broadband has substantially increased and the 10-year completion timeline for LTD will only create further disparities between funding and expenses. The lost economic value is even greater than \$15 million and may be unquantifiable.

Chippewa County representatives have attempted to contact LTD on several occasions to collaborate and request updates on their progress. Those attempts have failed and the County and its residents have lost faith that LTD can fulfill their promises to both the FCC and Chippewa County. The RDOF Award and LTD's ETC designation puts Chippewa County at a significant disadvantage for economic growth and vitality. Without improved broadband service, our schools, businesses, and residents will continue to suffer and fall further behind other communities where internet speeds meet the state minimum requirements.

We are requesting the PUC expedite the proceeding to reduce the County's uncertainty towards the development of fiber and internet infrastructure. Expediting the proceeding will assist Chippewa County to seek future opportunities to work with other developers who can fulfill the internet needs for our schools, businesses, and residents. Chippewa County requests for the PUC require submission of the long form application from LTD as part of its review and examination during the proceedings. The information contained in the long form application will prove useful in determining if LTD can deliver on its promises to Minnesota, Chippewa County, and other communities.

Sincerely,



Michelle May  
County Auditor/Treasurer/Coordinator