



Office of the Le Sueur County Administrator

88 SOUTH PARK AVENUE • LE CENTER, MINNESOTA 56057
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Joe Martin, County Administrator

May 18, 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

Le Sueur County appreciates the Minnesota Public Utilities Commission (PUC) willingness to consider initiating a proceeding to develop a record to determine whether LTD Broadband's expanded ETC designation should be revoked.

Official Comments

- **Le Sueur County supports the PUC initiating a proceeding to consider revoking LTD Broadband LLC expanded ETC designation.**

Le Sueur County is particularly impacted as it relates to RDOF and related LTD census tracts bid awards within our County. To the best of our knowledge, LTD has been potentially awarded 415 census tracts in our County. The entire RDOF award for LTD amounts to around \$1 million in Le Sueur County, an average of \$2,410 per census tract.

Within our internal planning processes, and working with existing providers, we estimate a cost of at least \$12 million to build fiber-to-the-door, even with extensive middle mile fiber already in place.

We are not aware of any significant work conducted, underway or planned within our County by LTD to install fiber networks in our communities. We have reached out to LTD several times and invited them to meetings to discuss their plans for investments within our County, however, we have not been able to secure such a meeting, nor has LTD communicated with us any plans for work within our County.

We have been working with existing internet service providers in our community who are willing and ready to conduct work, but have been hesitant to do so, as RDOF creates a barrier for them to access State and Federal grant dollars. In fact, we had a State Border to Border grant rejected in January 2021



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by the Minnesota Department of Employment and Economic Development on the grounds of RDOF and LTD commitments. As a result, we have lost two years of potential construction work.

- **Le Sueur County supports the PUC conducting an expedited proceeding.**

We would ask that you consider expediting the proceeding, as the County and providers are seeking regulatory certainty as it relates to accessing State and Federal grant programs to improve critical access to improved internet service within our County. The longer this issue remains unresolved, the less funds will likely be available for our local internet service providers to access and our citizens go without improved internet access which they all deserve.

- **Le Sueur County supports the Commission ordering LTD to submit its FCC RDOF long form application to the Commission.**

It would seem reasonable that the PUC request and receive the long form application to determine if LTD is a viable internet service provider to provide fiber networks within our County and other communities across Minnesota.

Sincerely,

Joe Martin, County Administrator

Le Sueur County