



Gerri D. Huser, Chair  
Richard W. Lozier, Jr., Board Member  
Joshua J. Byrnes, Board Member

May 13, 2021

Bret Dublinske  
Fredrikson & Byron, P.A.  
111 East Grand Avenue  
Suite 301  
Des Moines, IA 50309

RE: Docket No. ETA-2019-0001  
Application to Amend Eligible Telecommunications Carrier Designation

Dear Mr. Dublinske:

On May 7, 2021, LTD Broadband, LLC (LTD) filed an application requesting to amend Eligible Telecommunications Carrier (ETC) designation to include new locations in the state of Iowa where LTD was a winning bidder in the Federal Communications Commission's (FCC) Rural Digital Opportunity Fund (RDOF) auction.

Board staff is reviewing the filing and requests additional information on the following:

1. The RDOF Auction awarded locations for installation of broadband service is based on census blocks, however, Exhibit 1 in LTD's application describes the area to be designated in terms of census block groups. Staff requests that LTD file a revised Exhibit 1 to reflect all census blocks assigned as in the FCC's Public Reporting System<sup>1</sup>.
2. Staff notes that LTD was presumptively awarded support for gigabit service in the census blocks assigned. Staff requests that LTD certify that it will offer gigabit service in the census blocks assigned.
3. LTD states that its RDOF territory includes overlap with Tribal Areas as noted in Exhibit 4. Staff requests a copy of the application filed with the tribal authority as required at the time of filing of the application, pursuant to Board rule 199 IAC 39.3(2)(n).
4. Staff notes that LTD does not appear to have filed an annual report with the Board for reporting years 2019 and 2020. Additionally, LTD does not have a registration on file in Docket No. REG-4612 as required by the Board's February 22, 2019 order granting LTD's original designation in Docket No. ETA-2019-0001, and has not created a company profile on IUB 24/7 to submit an annual

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<sup>1</sup> FCC Public Reporting System Report for Assigned Census Blocks of Auction 904 Phase 1:  
[https://auctiondata.fcc.gov/public/projects/auction904/reports/assigned\\_census\\_blocks](https://auctiondata.fcc.gov/public/projects/auction904/reports/assigned_census_blocks)

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update. Staff requests an explanation regarding these general regulatory requirements for service in Iowa.

Board staff requests that LTD file a response addressing the issues stated above at its earliest convenience and no later than five days within receipt of this letter.

Sincerely,

*/s/ Matthew Alvarado*

Matthew Alvarado, Utility Analyst 2  
Regulatory Analysis

cc: Corey Hauer, LTD Broadband, LLC, 69 Teahouse Street, Las Vegas, NV 89138; Kristopher Twomey, Law Office of Kristopher E. Twomey, P.C., 1725 I Street, NW, Suite 300, Washington, DC 20006