

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

APPLICATION OF LTD BROADBAND, LLC)
FOR A CERTIFICATE OF TERRITORIAL) CAUSE NO. 45519
AUTHORITY FOR COMMUNICATIONS)
SERVICE PROVIDERS)

VERIFIED PRE-FILED REBUTTAL TESTIMONY
OF COREY HAUER
CHIEF OPERATING OFFICER
LTD BROADBAND LLC

May 12, 2021

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

2 **A.** My name is Corey Hauer. I am CEO of LTD Broadband, LLC (“LTD” or the “Company”).
3 My business address is 69 Teahouse St., Las Vegas, NV 89138.

4 **Q. ARE YOU THE SAME COREY HAUER THAT SIGNED THE AFFIDAVIT**
5 **SUPPORTING LTD’S APPLICATION FOR A COMMUNICATIONS SERVICE**
6 **PROVIDER (“CSP”) CERTIFICATE OF TERRITORIAL AUTHORITY (“CTA”)**
7 **FILED IN THIS PROCEEDING ON MARCH 15, 2021?**

8 **A.** Yes.

9 **Q. PLEASE DESCRIBE YOUR EDUCATION AND EMPLOYMENT**
10 **BACKGROUND.**

11 **A.** I founded LTD Broadband in 2010. Prior to this position, I founded Desktop Media, a
12 dialup ISP that eventually became a CLEC and was an early provider of fixed wireless
13 broadband. This CLEC/ISP was sold to Jaguar Communications in 2008. I studied
14 Computer and Electrical Engineering at Purdue University. Over the past 27 years I have
15 provided telecommunications and internet engineering consulting to a number of school
16 districts, ILECs, WISPs, airlines and private equity firms.

17 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

18 **A.** The purpose of my rebuttal testimony is to address and refute several assertions in the pre-
19 filed testimony of John E. Greene, a witness for New Lisbon Telephone Company, Inc. and
20 New Lisbon Broadband and Communications, LLC (together, “New Lisbon”). Mr.
21 Greene’s objections to LTD’s application for a communications service provider CTA are
22 motivated by competitive considerations and based purely on speculation, innuendo and

1 the perspective of a subsidized local rural exchange carrier (“RLEC”) that knows nothing
2 about LTD’s proven entrepreneurial business model. Ultimately, I respectfully request that
3 the Commission grant LTD’s request for a CTA because LTD has demonstrated that it
4 satisfies the requirements set forth in Indiana law.

5
6 **II. BACKGROUND**

7 **Q. PLEASE EXPLAIN LTD’S EFFORTS TO DATE TO OBTAIN A CTA.**

8 **A.** LTD filed its CTA Application with the Indiana Utility Regulatory Commission the
9 (“Commission”) on March 15, 2021 using the Commission’s standard CTA Application
10 form. LTD included the information required by the form, which included among other
11 things, the services and area for which its CTA is requested, biographic information for
12 LTD’s key management and technical staff, LTD’s confidential financial data and the
13 required affirmations. On April 1, 2021, New Lisbon submitted its request for a hearing
14 on LTD’s CTA application and in his May 3, 2021 testimony, Mr. Greene recommends
15 that the Commission deny LTD’s request for a CTA because he alleges LTD has not
16 provided “any evidence to show that it has the financial, technical and managerial ability
17 to construct the network nor provide the services it has committed to provide.”¹

18 **Q. TO BE ELIGIBLE TO RECEIVE A CTA, MUST LTD DEMONSTRATE THAT IT**
19 **HAS THE FINANCIAL, MANAGERIAL AND TECHNICAL ABILITY TO**
20 **“CONSTRUCT THE NETWORK IT HAS COMMITTED TO PROVIDE?”**

21 **A.** No. If a hearing is requested, the Commission must evaluate whether the applicant has the
22 technical, financial and managerial ability to “provide the communications services for

¹ Testimony of J. Greene at 12.

1 which it seeks certification.”² The Commission does not evaluate an applicant’s ability to
2 construct a network.

3 **Q. IN LIGHT OF NEW LISBON’S OBJECTION TO LTD’S CTA REQUEST, PLEASE**
4 **PROVIDE A MORE COMPLETE DESCRIPTION OF LTD AND ITS**
5 **OPERATIONS.**

6 **A.** LTD is a privately-held limited liability company formed in the State of Nevada in October
7 2010. The Company’s principal place of business is 69 Teahouse St, Las Vegas NV 89138.
8 I hold a 100% controlling interest (100%) in the Company. LTD has grown from a single
9 water tower site in Rose Creek, Minnesota in 2011 to a network of over 2200 tower sites
10 covering over 50,000 square miles servicing 16,500 customers. Currently LTD offers
11 service in Iowa, Kansas, Minnesota, Nebraska, South Dakota and Wisconsin. We are
12 continuing rapid expansion of our footprint averaging 30 new tower sites each month in
13 states including Indiana. LTD is also overbuilding much of our existing fixed wireless
14 footprint with 5G millimeter wave fixed wireless equipment to enable gigabit speeds. We
15 operate an extensive fiber network with geographically dispersed redundant paths to insure
16 maximum reliability and throughput to our tower network. We believe we are one of the
17 fastest if not the fastest growing and largest providers (by coverage area) of fixed-wireless
18 broadband in the US. For our RDOF areas we intend to deploy FTTH in the last mile using
19 GPON and XGPON technology to offer speeds up to 10 Gbps. Middle mile connections
20 may utilize multi-gigabit fixed-wireless in certain instances.

21 **Q. PLEASE DESCRIBE THE COMPANY’S CURRENT CUSTOMER BASE.**

² Indiana Code § 8-1-32.5-9.

1 **A.** LTD has historically focused our coverage on unserved and underserved rural areas and
2 small towns. While rural locations are our primary focus, we are also starting to leverage
3 5G millimeter wave technologies in some larger communities to offer a competitive choice
4 to customers receiving broadband via cable or fiber connections.

5 **Q. PLEASE DESCRIBE LTD’S TRACK RECORD OF PROVIDING SERVICE IN**
6 **OTHER JURISDICTIONS AS A RECIPIENT OF AN AWARD FROM THE**
7 **CONNECT AMERICA FUND PHASE II (“CAF PHASE II”).**

8 **A.** LTD has nearly completed its CAF Phase II buildout and is on track to deploy service on
9 time and potentially ahead of schedule. In fact, LTD is far ahead of many CAF Phase II
10 winners in completing its obligations. LTD completed its 5th year obligation of 80%
11 buildout in both Iowa and Minnesota by the end of year 1. That is four years ahead of the
12 CAF Phase II requirement, which was to complete 80% by the end of year 5. LTD also
13 expects to finish 100% of its CAF Phase II obligation for Illinois later this year - also four
14 years ahead of schedule.

15 **Q. IN WHAT JURISDICTIONS IS LTD CURRENTLY AUTHORIZED TO PROVIDE**
16 **COMMUNICATIONS SERVICES?**

17 **A.** LTD is authorized to provide communications service in Iowa, Kansas, Minnesota,
18 Nebraska, South Dakota and Wisconsin and is designated as an Eligible
19 Telecommunications Carrier (“ETC”) in Illinois, Iowa and Minnesota. In addition to
20 Indiana, the Company is currently seeking authorization as an ETC in 11 other jurisdictions
21 where it has been awarded RDOF funding: California, Colorado, Kansas, Missouri,
22 Nebraska, North Dakota, Ohio, Oklahoma, South Dakota, Texas and Wisconsin. The
23 Company’s applications for ETC designation are currently pending before the relevant

1 regulatory commissions in those states. LTD also has filed to expand its ETC designation
2 in Illinois, Iowa and Minnesota to include the additional Rural Digital Opportunity Fund
3 (“RDOF”) census blocks where it was the auction winner.

4 **Q. FOR WHAT COMMUNICATIONS SERVICES IS LTD REQUESTING A CTA?**

5 **A.** LTD’s CTA application requests authority to provide the following telecommunications
6 services: interconnected VoIP service; dedicated transport telecommunications services;
7 and facilities based local exchange service, which LTD clarified in its Response to the
8 Presiding Officers’ May 7, 2021 Docket Entry Question. LTD’s CTA application also
9 requests authority to provide the following information services: internet access service and
10 broadband service.

11 **Q. PLEASE DESCRIBE LTD’S FINANCIAL ABILITY TO PROVIDE THE**
12 **COMMUNICATIONS SERVICES FOR WHICH IT SEEKS A CTA.**

13 **A.** LTD has submitted to the Commission its confidential financial data in support of its CTA
14 application. As noted above, LTD operates in six states and is poised to expand service
15 into several other states as part of its award from the RDOF. For the last seven years, LTD
16 has been growing 40% annually. LTD has completed 70% of its CAF Phase II buildout
17 obligation and will finish years ahead of schedule. LTD has built one of the largest fixed
18 wireless coverage areas in rural areas in the United States. Our financial data combined
19 with our track record demonstrate that LTD has the experience and ability to manage its
20 financial resources to provide the communications services for which it seeks certification
21 from this Commission.

22 **Q. PLEASE DESCRIBE LTD’S MANAGERIAL ABILITY TO PROVIDE THE**
23 **COMMUNICATIONS SERVICES FOR WHICH IT SEEKS A CTA.**

1 **A.** I have 27 years of experience in the telecommunications and internet engineering
2 consulting industries. My role with LTD is to oversee all aspects of LTD's business
3 including but not limited to network construction, day-to-day operations, customer service
4 and regulatory compliance. The other key managerial staff for LTD are the five individuals
5 identified in the updated attachment to our CTA application. Together, these professionals
6 have a combined 67 years of experience in the fields of telecommunications, customer care
7 and marketing. As I discuss in greater detail below, our fiber engineering team is led by
8 LTD's Fiber Engineering Lead, Jim O'Regan and LTD's Tower Tech Manager, Justin
9 Hansen. Mr. O'Regan has 27 years of experience designing and building fiber networks.
10 Mr. Hansen oversees tower buildout, installation and repairs and brings 8 years of
11 experience. With combined experience of 32 years, our customer service, marketing and
12 installation and repair activities are managed by Rebecca Severtson, Haley Tollefson and
13 Chad Peterson, respectively. Our managerial staff is currently supported by approximately
14 154 full-time employees and this number will grow as our network expands. Together,
15 LTD's managerial team has the ability to ensure that LTD continues to deploy networks
16 and offer quality customer service while remaining in compliance with regulatory
17 requirements.

18 **Q. PLEASE DESCRIBE LTD'S TECHNICAL ABILITY TO PROVIDE THE**
19 **COMMUNICATION SERVICES FOR WHICH IT SEEKS A CTA.**

20 **A.** LTD has built one of the largest fixed wireless coverage areas in rural areas in the United
21 States in a very short time. Led by Mr. O'Regan, our Indiana network will be designed and
22 overseen by experienced professionals. Our expertise is in creating teams to execute on
23 repeatable construction processes. LTD has installed thousands of trenched and aerial fiber

1 and Ethernet drops with its current personnel. Where necessary and appropriate, LTD hires
2 contractors and a construction workforce to deploy its facilities. LTD will employ its
3 expertise and experience to deploy service in Indiana. LTD has engaged with outside
4 engineering and construction companies and is positioning resources to begin construction.
5 In addition to partnering with contractors, LTD is preparing to hire and train over 500
6 construction staff including many local workers in Indiana. LTD is recruiting seasoned
7 outside plant professionals that agree with LTD's vision of an entrepreneurial approach to
8 fiber deployment. LTD also has scaled its staffing to meet its CAF performance obligations
9 and there is no reason to believe LTD will not do the same with respect to RDOF. LTD is
10 currently involved in strategic transactions that will bring additional resources to our teams
11 in multiple states where we do not yet serve. At the conclusion of these transactions, LTD
12 expects to have boots on the ground in 12 of the 15 states (including Indiana) that comprise
13 our RDOF award area. LTD will manage the timing of its hiring and contractual activities
14 to align with the FCC's approvals so that LTD is positioned to comply with the applicable
15 buildout milestones.

16 **Q. WHAT ARE THE TIMING CONSIDERATIONS GUIDING LTD'S FINANCIAL,**
17 **MANAGERIAL AND TECHNICAL DECISIONS FOR PROVIDING SERVICE**
18 **RELATED TO THE RDOF AWARD?**

19 A. Following the FCC's December 2020 notification that LTD was the successful bidder for
20 certain RDOF funds in Indiana, the FCC is presently engaged in an intensive review of
21 LTD's long-form application, which includes an in-depth examination of LTD's financial
22 and technical qualifications and abilities to meet the FCC's RDOF requirements. The
23 precise duration of this process is unknown and it could take the FCC several months to

1 complete its review and authorize RDOF support to LTD. LTD's financial, managerial and
2 technical decisions will be timed appropriately to align with the FCC's approval so that
3 LTD's financial, technical and hiring commitments are consistent with the FCC's
4 directives.

5
6 **III. RESPONSE TO MR. GREENE'S TESTIMONY**

7 **Q. DO YOU KNOW OR HAVE YOU OR LTD HAD ANY BUSINESS**
8 **RELATIONSHIP WITH MR. GREENE OR THE NEW LISBON**
9 **COMMUNICATIONS ENTITIES HE REPRESENTS?**

10 **A.** No.

11 **Q. PLEASE COMMENT ON MR. GREENE'S TESTIMONY AT PAGE 3 WHERE HE**
12 **QUESTIONS WHETHER LTD HAS THE FINANCIAL, MANAGERIAL AND**
13 **TECHNICAL ABILITY TO PROVIDE THE SERVICES FOR WHICH IT SEEKS**
14 **A CTA.**

15 **A.** As an initial matter, I note that Mr. Greene has no personal knowledge of LTD's
16 confidential finances, business model or strategy for extending service to Indiana.
17 Traditionally, RLECs like New Lisbon have relied on federal Universal Service Fund
18 support as a key subsidy for its business operations. For decades, RLECs have built their
19 business model around these subsidies. Unlike entrepreneurial companies like LTD,
20 RLECs have little experience with a business model where such subsidies do not exist.

21 **Q. IS IT COMMON FOR A CTA APPLICATION TO BE OPPOSED?**

22 **A.** No, my understanding is that New Lisbon is the first and only communications service
23 provider to object to a CTA application since the Commission began using the streamlined

CTA form application process approximately 14 years ago. What Mr. Greene does not reveal is that New Lisbon's motivation is purely competitive. Mr. Greene's testimony is strikingly similar to the positions of other RLECs objecting to LTD's RDOF awards in other states, which raises the specter of a coordinated, nationwide RLEC effort to eliminate LTD as a competitor based on speculation and hearsay, either by attempting to strip LTD's RDOF award, prevent LTD from obtaining certification as a communications service provider, or convince state commissions to deny LTD's designation as an ETC. This all-out blitz by RLECs is not supported by any evidence, but rather is motivated by fear that LTD will create competition in the RLECs' traditionally subsidized rural footprints.

Q. PLEASE RESPOND TO MR. GREENE'S TESTIMONY SUGGESTING THAT LTD FAILED TO PROVIDE SUFFICIENT INFORMATION REGARDING ITS MANAGERIAL ABILITY.

A. Question 6 on page 3 of Mr. Greene's testimony erroneously suggests that Indiana Code § 8-1-32.5-6(B)(2) requires LTD to "[p]rovide biographies of its corporate officers." Although the Commission's CTA form instructs CTA applicants to provide biographies of an applicant's corporate officers responsible for Indiana indicating managerial and technical qualifications, the Indiana Code does not require a CSP CTA applicant to demonstrate managerial ability by providing evidence confined solely to "corporate officers." This is likely the case because all business organizations are not corporations with "corporate officers." Since LTD is a limited liability company, it does not have corporate officers. As such, LTD provided biographies of its key management team who will have responsibility for the main aspects of providing the service for which a CTA is

1 requested. As discussed previously, my experience along with that of LTD's key
2 management staff brings over 82 years of managerial experience to LTD.

3 Here again, Mr. Greene is attempting to impart the RLEC business model on an
4 entrepreneurial company. Mr. Greene's allegations that LTD has a small staff and limited
5 resources is false. LTD has more than 150 employees in 23 states.

6 **Q. PLEASE RESPOND TO MR. GREENE'S ALLEGATION AT PAGE 4 THAT**
7 **"THERE IS NO EVIDENCE THAT LTD HAS ANY EXPERIENCE**
8 **ENGINEERING, DESIGNING, CONSTRUCTING, INSTALLING AND**
9 **OPERATING A FTTH NETWORK THAT WILL DELIVER 1 Gbps SERVICE."**

10 **A.** As a subsidy-based legacy rural exchange competitor with a business model that is very
11 different from LTDs, Mr. Greene has no personal knowledge of the facts supporting LTD's
12 experience – nor should he. Mr. Greene's testimony is nothing more than unbridled and
13 unsupported speculation by a disappointed, unsuccessful RDOF bidder. I also note that
14 when New Lisbon began offering fixed-wireless internet service, it had not previously done
15 so. New Lisbon did not equip and train its staff to climb and erect towers until it did so.
16 Similarly, LTD will equip and train our staff to deploy fiber networks once its RDOF long
17 form is approved.

18 **Q. DO YOU AGREE WITH MR. GREENE'S STATEMENT AT PAGE 4 THAT THE**
19 **DIFFERENCE BETWEEN ENGINEERING, DESIGNING, CONSTRUCTING,**
20 **INSTALLING AND OPERATING A FIXED WIRELESS NETWORK VERSUS A**
21 **FTTH NETWORK IS ANALOGOUS TO THE DIFFERENCE BETWEEN**
22 **DESIGNING, ENGINEERING, AND CONSTRUCTING COMMERCIAL HIGH**
23 **RISE BUILDINGS VERSUS INTERSTATE HIGHWAYS?**

1 **A.** No. A better analogy would be constructing a cable television network versus constructing
2 an electrical distribution grid. There are significant overlaps, but some key differences in
3 equipment.

4 **Q. PLEASE RESPOND TO MR. GREENE’S STATEMENT AT PAGES 5 AND 9**
5 **THAT LTD “IS A CLASSIC WISP” THAT HAS NOT DEMONSTRATED IT HAS**
6 **THE MANAGERIAL AND TECHNICAL ABILITY TO CONSTRUCT AND**
7 **OPERATE A LARGE FIBER NETWORK IN INDIANA.**

8 **A.** Again, Mr. Greene misunderstands the requirement for an Indiana CTA applicant is to
9 demonstrate the requisite ability to provide the communications services for which
10 authority is requested, and not to demonstrate the applicant’s ability to construct a network.
11 Mr. Greene also apparently does not appreciate that many aspects of operating a WISP,
12 such as customer service, are identical to operating a fiber-based network. He also does
13 not appreciate that LTD currently provides service via fiber to customers in other states,
14 and we are scaling to deploy more fiber going forward. LTD has installed thousands of
15 underground drop facilities and has 8 years experiencing installing and splicing
16 underground and aerial fiber as part of our WISP builds.

17 Mr. Greene seems to want to denigrate WISPs as second-class broadband providers
18 (even though New Lisbon operates a WISP itself). As someone that is very familiar with
19 largest WISP operators in the US and Canada, I can confidently say that large WISPs offer
20 high quality service and are well respected in the broadband industry. New Lisbon’s RLEC
21 network is extremely small relative to the network built and operated by LTD, which
22 presently has 1.4 million households passed.

1 Ultimately, Mr. Greene's testimony must be taken in context. While his company's
2 bidding strategy was unsuccessful in the RDOF auction, it has no bearing on LTD's ability
3 to provide the communications services for which LTD seeks certification in Indiana.

4 **Q. HOW DO YOU RESPOND TO MR. GREENE'S "BELIEF" AT PAGE 5 THAT "IT**
5 **IS UNLIKELY THAT LTD HAS RELATIONSHIPS WITH QUALIFIED**
6 **CONTRACTORS IN INDIANA BECAUSE LTD HAS NEVER CONDUCTED**
7 **BUSINESS IN INDIANA NOR DOES IT HAVE EXPERIENCE CONSTRUCTING**
8 **AND OPERATING A FTTH NETWORK"?**

9 **A.** First, I note that Mr. Greene has no personal knowledge of LTD's existing or potential
10 relationships with contractors – nor should he, as a potential competitor. LTD has been
11 meeting with counties in Indiana to pave the way for a smooth deployment of FTTH in
12 their areas. LTD has years of experience in growing both its workforce and network at a
13 rapid pace. As an example, in 2020, LTD constructed 395 new tower sites and increased
14 its workforce by over 30%. Second, Mr. Greene apparently believes that the State of
15 Indiana should not open its doors to businesses from other states, which is especially
16 troubling when LTD is poised to extend broadband service to Hoosiers who for years have
17 remain unserved.

18 **Q. MR. GREENE SPENDS 3 PAGES (6 -9) CLAIMING THAT LTD'S BUSINESS**
19 **OPERATION LOCATIONS ARE "SPURIOUS," "IMPERMANENT," "SPARSE,"**
20 **AND "BARREN" WHICH HE CLAIMS SHOWS THAT LTD LACKS (1) THE**
21 **TECHNICAL ABILITY TO CONSTRUCT OR OPERATE A FIBER NETWORK;**
22 **AND (2) THE FINANCIAL ABILITY TO FINANCE A LARGE FTTH PROJECT.**
23 **PLEASE RESPOND.**

1 **A.** The claim is preposterous. First, Mr. Greene obviously misunderstands that a Google Maps
2 image will quite likely capture a picture of a premises at a point in time that could well be
3 outdated by years or decades. Second, Mr. Greene has no personal knowledge of what
4 exists at each physical address but apparently, and without any basis, believes LTD has lied
5 about its operations in its data responses. While it is irrelevant to a showing that LTD has
6 either the managerial or technical ability to provide communications services in Indiana, I
7 assure the Commission that LTD conducts business operations in some form at each of the
8 locations listed in Mr. Greene's Answer #12. The relevant consideration for the
9 Commission is whether LTD has the financial, technical and managerial ability to provide
10 the communications services for which it seeks authority. The number of operations
11 locations and the nature of work performed inside has no tendency to prove or disprove
12 those considerations. What is relevant is that LTD has demonstrated that using its current
13 entrepreneurial business model, LTD is already providing communications service in six
14 states and it has the technical, managerial and financial ability to do the same in Indiana.
15 The reality is that LTD will install fiber with its own construction teams using modern
16 equipment at likely one-half to one-third of the cost of the dated infrastructure deployed by
17 RLECs.

18 **Q. PLEASE RESPOND TO MR. GREENE'S TESTIMONY AT PAGE 10-12**
19 **REGARDING LTD'S FINANCIAL ABILITY.**

20 **A.** First, Mr. Greene clearly misunderstands the applicable requirement, which is whether
21 LTD has the financial ability to *provide the communication service for which authority is*
22 *requested* and not whether LTD can "finance the infrastructure it plans to deploy in
23 Indiana" as Mr. Greene repeatedly misstates on pages 10, 11 and 12. Second, Mr. Greene

1 has no personal knowledge of LTD's confidential financial data (and if he has reviewed
2 LTD's confidential financial data provided to New Lisbon's counsel as Highly Confidential
3 Information, Mr. Greene has violated the parties' Non-Disclosure Agreement). Third, Mr.
4 Greene's pontification on what "conventional lenders typically consider" is irrelevant
5 because Mr. Greene has no personal knowledge of whether and to what extent LTD will
6 even solicit funding from "conventional lenders." nor has he explained the basis for his
7 statement of what they "typically consider." Ultimately, Mr. Greene's statements are
8 unsupported by facts. It is confounding that Mr. Greene presumes to know the economic
9 considerations of LTD when he has no personal knowledge of or access to LTD's financial
10 data, engineering plans or business model. Mr. Greene has offered nothing more than
11 innuendo and unsupported speculation for this specious claim. Mr. Greene's suggestion
12 that LTD is inept, inexperienced and cannot provide communications services in Indiana is
13 pure fantasy. Mr. Greene's abject speculation should not be mistaken for the fact that LTD
14 has satisfied every element of the requirements for a communications service provider CTA
15 applicant. LTD has presented financial data to demonstrate its ability to offer the
16 communications services for which it seeks authority to provide in Indiana. Just as it did
17 when managing its financial needs to meet its CAF Phase II obligations, LTD has taken
18 prudent steps to identify and meet any future financing needs to align with the FCC's
19 approvals so that LTD is positioned to comply with the applicable RDOF buildout
20 milestones.

21 **Q. ARE THERE OTHER CONSIDERATIONS RELEVANT TO THIS**
22 **COMMISSION'S DETERMINATION OF WHETHER LTD HAS THE**

**FINANCIAL, MANAGERIAL AND TECHNICAL ABILITY TO OFFER
COMMUNICATIONS SERVICES IN INDIANA?**

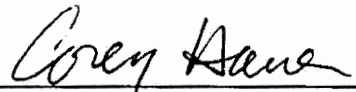
A. Mr. Greene has focused on LTD because New Lisbon was an unsuccessful bidder in areas where LTD was successful – in specific geographies that he must have deemed important for New Lisbon to win. Mr. Greene’s unhappiness about the outcome of the RDOF auction has no bearing on LTD’s CTA application. LTD has the financial, technical and managerial abilities required to provide the communications services for which it seeks a CTA. As such, the Commission should grant LTD’s CTA and reject a disappointed bidder’s improper attempts to second-guess the FCC’s auction rules.

Q. DOES THAT CONCLUDE YOUR TESTIMONY?

A. Yes.

VERIFICATION

I hereby swear or affirm that the foregoing testimony is true and accurate to the best of my knowledge and belief.



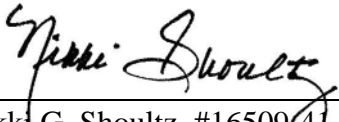
Corey Hauer

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been served upon the following counsel of record electronically this 12TH day of May, 2021:

Karol Krohn
Indiana Office of Utility Consumer Counselor
PNC Center, Suite 1500 South
115 West Washington Street
Indianapolis, IN 46204
infomgt@oucc.in.gov
kkrohn@oucc.in.gov

Jeremy L. Fetty
Erin C. Borissov
Aleasha J. Boling
PARR RICHEY FRANSEN
PATTERSON KRUSE LLP
251 N. Illinois Street, Suite 1800
Indianapolis, Indiana 46204
jfetty@parrlaw.com
eborissov@parrlaw.com
aboling@parrlaw.com



Nikki G. Shoultz, #1650941