

BEFORE THE  
INDIANA UTILITY REGULATORY COMMISSION

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Application of LTD Broadband, LLC	)	
for Designation as an Eligible	)	
Telecommunications Carrier for the	)	
Purpose of Providing Services	)	<b>Docket No. 41052 ETC 96</b>
Supported by the FCC's Rural	)	
Digital Opportunity Fund	)	

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

April 16, 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 Broadband). My  
3       business address is 69 Teahouse St., Las Vegas, NV 89138.

4   **Q.   ARE YOU THE SAME COREY HAUER THAT PRE-FILED DIRECT**  
5       **TESTIMONY IN THIS PROCEEDING?**

6   **A.**   Yes.

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

8   **A.**   The purpose of my rebuttal testimony is to address and refute several assertions in the pre-  
9       filed testimony of John E. Greene, a witness for the Indiana Rural Broadband Association  
10      ("IRBA"). Mr. Greene's objections to LTD's designation as an Indiana ETC are motivated  
11      by competitive considerations and based purely on speculation, innuendo and the  
12      perspective of a subsidized local rural exchange carrier ("RLEC") that knows nothing about  
13      LTD's proven entrepreneurial business model. Ultimately, I respectfully request that the  
14      Commission grant LTD's request for ETC designation because LTD has demonstrated that  
15      it satisfies the requirements set forth in federal and Indiana law.

16   **Q.   DO YOU KNOW OR HAVE YOU OR LTD HAD ANY INTERACTION OR**  
17       **BUSINESS RELATIONSHIP WITH MR. GREENE OR THE NEW LISBON**  
18       **COMMUNICATIONS ENTITIES HE REPRESENTS?**

19   **A.**   No.

20   **Q.   PLEASE COMMENT ON MR. GREENE'S TESTIMONY AT PAGE 4 WHERE HE**  
21       **STATES THAT IRBA SERVES PRIMARILY IN RURAL INDIANA AREAS AND**

**UNIVERSAL SERVICE FUNDING HAS BEEN A KEY SOURCE OF SUPPORT IN  
THESE HIGH COST AREAS.**

**A.** Traditionally, RLECs have relied on federal Universal Service Fund support as a key subsidy for its business operations. For decades, RLECs have built their business model around these subsidies. Unlike entrepreneurial companies like LTD, RLECs have little experience with a business model where such subsidies do not exist.

**Q. PLEASE COMMENT ON MR. GREENE’S STATEMENT THAT IRBA OPPOSES LTD’S REQUEST BECAUSE IRBA DOES NOT BELIEVE THAT LTD MEETS THE REQUIREMENTS FOR ETC DESIGNATION AND THAT IRBA’S MEMBERS HAVE A STRONG INTEREST IN ENSURING HIGH COST SUPPORT GOES TO RECIPIENTS WHO WILL DELIVER THE NETWORKS, INFRASTRUCTURE, AND SERVICE TO RURAL HOOSIERS THEY HAVE PROMISED.**

**A.** What Mr. Greene does not reveal is that IRBA’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. Most of the arguments Mr. Greene raises appear to be taken directly from a Petition filed by the Minnesota Telecommunications Alliance and the Iowa

1 Communications Alliance (the “MTA/ICA Petition”) asking the Federal Communications  
2 Commission (“FCC”) to deny LTD’s Auction 904 long-form application for the awarded  
3 census blocks in Minnesota and Iowa despite the fact that the FCC’s rules do not provide  
4 for such challenges. The MTA/ICA Petition is based on rampant speculation from  
5 disappointed bidders, filed in hopes that if LTD’s Application is denied, their members will  
6 get a second opportunity in RDOF Phase II to bid on the census blocks that LTD won. LTD  
7 filed its response with the FCC on April 1, 2021, which is included as **Attachment CH-R1**  
8 to this testimony.

9 **Q. DO YOU AGREE WITH MR. GREENE’S STATEMENT THAT “LTD’S**  
10 **PETITION AND TESTIMONY IN THIS CAUSE STATE THAT LTD WAS**  
11 **AWARDED A TOTAL OF ONLY \$5,445,691.79 OVER A PERIOD OF 10 YEARS;**  
12 **HOWEVER, THIS AMOUNT IS ACTUALLY WHAT LTD WILL RECEIVE**  
13 **ANNUALLY OVER THE 10-YEAR PERIOD AND IS ONLY A TENTH OF ITS**  
14 **TOTAL AWARD?”**

15 **A.** The RDOF award to LTD for Indiana is \$5,445,691.79 annually over a period of ten years.  
16 LTD’s total award amount is plainly stated in the FCC bid award notice, to which LTD  
17 cited at page 4, footnotes 4 and 5 of its Verified Application. The omission of the word  
18 “annually” was not intended to be misleading and to the extent that my pre-filed direct  
19 testimony or the LTD application do not make this clear, I am providing that clarification  
20 here.

21 **Q. MR. GREENE CONTENDS LTD HAS NOT MADE CLEAR THE AREAS FOR**  
22 **WHICH IT SEEKS ETC DESIGNATION IN INDIANA OR ITS INTENT TO**

**PROVIDE REQUIRED SERVICES IN AREAS WHERE LTD IS GRANTED ETC  
DESIGNATION BUT IS NOT RECEIVING RDOF FUNDNG. PLEASE RESPOND.**

**A.** As indicated in my pre-filed direct testimony and LTD's Application, LTD was awarded support for 756 census blocks in Indiana. The Company therefore requests that its ETC designation encompass a service area consisting of those census blocks in Indiana where it has been awarded support by the FCC. LTD Broadband provided a list of these census blocks and a map of Indiana identifying where the census blocks are located within the state as Attachment 2 to its Application. LTD is seeking ETC designation on a census block level.

**Q. PLEASE FURTHER CLARIFY LTD'S REQUESTED INDIANA ETC SERVICE  
AREA.**

**A.** On April 14, 2021, the Presiding Officers issued several Docket Entry questions directed to LTD. Relevant to LTD's requested ETC service territory, the Commission states that the list referenced in Attachment 2 of Petitioner's Verified Application filed in this Cause shows a list of census block groups and that the FCC's Long-Form Applicant spreadsheet shows Petitioner was assigned 5,458 census blocks. The Presiding Officers asked LTD to clarify whether Petitioner intends to serve the entire list of census block groups as an ETC if the RDOF Auction only supports broadband in a smaller service area defined by approved census blocks. LTD intends to serve as an ETC only in the smaller service area defined by approved census blocks.

**Q. PLEASE RESPOND TO MR. GREENE'S ASSERTION THAT LTD HAS NOT  
DEMONSTRATED THAT IT WILL MEET THE RDOF'S BUILD OUT  
REQUIREMENTS IN THE REQUIRED TIMEFRAME.**

1    **A.**     The claim is preposterous. Mr. Greene asserts that LTD must deploy facilities and offer  
2           gigabit, low-latency service to all Indiana census blocks for which it received RDOF  
3           funding within six years of receiving FCC approval for the RDOF funding. He claims that  
4           “[n]owhere in LTD’s petition or testimony does it indicate that it will comply with this  
5           RDOF buildout timeline.” At page 14 of my pre-filed direct testimony I confirmed that the  
6           precise date for commencement of LTD’s Indiana Lifeline service is uncertain, but we plan  
7           on commencing construction within 3 months of the FCC issuing the ready to fund notice  
8           for LTD’s award. Assuming the FCC follows similar procedures for the approval and  
9           disbursement of funds that were used for FCC Auction 903: Connect America Fund Phase  
10          II (CAF II), LTD has developed an aggressive construction timeline and plans to meet or  
11          exceed RDOF milestone requirements by completing construction of 20 percent of  
12          locations by the end of year 2 (estimated 2023, optional milestone), 40 percent of locations  
13          by the end of year 3 (estimated 2024), 60 percent of locations by the end of year 4 (estimated  
14          2025), 80 percent of locations by year 5 (estimated 2026), and 100% of locations by year  
15          6 (estimated 2027).” To be clear, LTD intends to comply with *all* RDOF and IURC  
16          requirements. By indicating that LTD will provide service as soon as possible, LTD  
17          emphasizes that it takes the RDOF timelines seriously and intends to comply with them.

18    **Q.     PLEASE CLARIFY LTD’S USAGE POLICY FOR LIFELINE SERVICE.**

19    **A.**     In their April 14, 2021 Docket Entry, the Presiding Officers asked whether LTD will offer  
20          Lifeline plans that are subject to the FCC’s “usage” requirements in 47 CFR 54.407;  
21          whether services to Lifeline customers are billed to the customer on a monthly billing cycle  
22          or whether the customer will prepay for the phone service; and whether Petitioner will offer  
23          any Lifeline voice telephony or broadband packages to eligible Lifeline customers that

1 appear to be free to the end user customer because the federal Lifeline subsidy covers the  
2 monthly recurring cost of the service. LTD's Lifeline customers will prepay for phone  
3 service and none of the plans offered by LTD will be free or appear to be free to the end  
4 user customer. I note this is not a requirement for RDOF recipients.

5 **Q. HOW DO YOU RESPOND TO MR. GREENE'S ASSERTION THAT LTD**  
6 **SUBMITTED BIDS FOR MANY INDIANA CENSUS BLOCKS THAT WERE NOT**  
7 **ECONOMICALLY SUSTAINABLE?**

8 **A.** Mr. Greene's statement is untrue and unsupported by facts. It is confounding that Mr.  
9 Greene presumes to know the economic considerations of LTD when he has no personal  
10 knowledge of or access to, LTD's financial data, engineering plans or business model. Mr.  
11 Greene has offered nothing more than innuendo and unsupported speculation for this  
12 specious claim. LTD is the auction winner for census blocks that are economically  
13 sustainable and that LTD is committed to honor. Mr. Greene's suggestion that LTD is  
14 inept, inexperienced and cannot execute its RDOF obligations is pure fantasy. The reality  
15 is that LTD will install fiber with its own construction teams using modern equipment at  
16 likely one-half to one-third of the cost of the dated infrastructure deployed by RLECs. LTD  
17 has the technical, managerial and financial ability to provide service as an Indiana ETC and  
18 to fulfill its RDOF obligations. Mr. Greene's abject speculation should not be mistaken for  
19 the fact that LTD has satisfied every element of the requirements for ETC designation.

20 Mr. Greene's claim that LTD does not currently offer residential broadband service  
21 that even approaches the RDOF gigabit service tier (1 Gbps downstream/500 Mbps  
22 upstream) that LTD bid in the Indiana census blocks is irrelevant. It is no wonder that Mr.  
23 Greene concludes that, "It strikes me as very odd that such an entity would commit to a

1 very large fiber buildout and gigabyte *[sic]* service for 20-30 percent funding level.” As a  
2 subsidy-based legacy rural exchange competitor with a business model that is very different  
3 from LTDs, Mr. Greene has no personal knowledge of the facts or economic considerations  
4 supporting LTD’s business decisions – nor should he. Moreover, he ignores that fact that  
5 consumers have not demanded Gigabit service, which is why LTD does not currently offer  
6 it. Mr. Greene’s testimony is nothing more than unbridled and unsupported speculation by  
7 a dissatisfied, unsuccessful RDOF bidder.

8 **Q. PLEASE RESPOND TO MR. GREENE’S STATEMENT THAT “ACCORDING TO**  
9 **LTD’S WEBSITE, LTD DOES NOT CURRENTLY OFFER ANY FIBER**  
10 **SERVICES IN ITS SERVICE TERRITORY, YET LTD HOLDS ITSELF OUT AS**  
11 **THOUGH ITS ADVERTISING AS A WIRELESS AND FIBER COMPANY.**

12 **A.** Mr. Greene’s statement is false. LTD has installed fiber both with its own workforce and  
13 contracted workforce.

14 **Q. PLEASE ADDRESS MR. GREENE’S CLAIMS THAT LTD’S TESTIMONY DOES**  
15 **NOT ALIGN WITH THE INFORMATION ON LTD’S WEBSITE.**

16 **A.** Mr. Greene claims that LTD’s website does not support the statement at page 7 of my pre-  
17 filed direct testimony that: "At this time, LTD Broadband delivers retail plans with  
18 download speeds of up to 60 Mbps." As with many large ISPs LTD offers different plans  
19 in different areas including plans up to 300/300 Mbps service. As the 300/300 plan is not  
20 yet available across LTD’s 50,000 square mile footprint, the plan is not listed on the website  
21 but is rather advertised in the local communities where it is available.

22 **Q. PLEASE RESPOND TO MR. GREENE’S TESTIMONY REGARDING LTD’S**  
23 **SERVICE QUALITY AND CUSTOMER SATISFACTION TRACK RECORD.**



1 A. Mr. Greene's testimony is further evidence that IRBA is coordinating with other  
2 disgruntled RLECs and their state associations, like MTA/ICA, who also cite a *Minnesota*  
3 Better Business Bureau review. Mr. Greene obtusely suggests that the mere existence of 14  
4 customer complaints in Minnesota, by itself and without any elaboration as to the substance  
5 of the complaints, is somehow excessive. Mr. Greene fails to explain how a small sample of  
6 unverified and hearsay reviews in Minnesota is significant enough to raise questions that  
7 should result in denial of LTD's Application in Indiana. Mr. Greene also ignores other  
8 sources of customer reviews such as Google, where LTD has a 4.44-star rating based on 81  
9 customer reviews. Notably, on Google, New Lisbon Telephone Company has a 3.4-star  
10 rating based on 23 reviews with multiple 1-star reviews highlighting New Lisbon's dismal  
11 service and exorbitant prices, yet New Lisbon professes to satisfy the customer service  
12 requirements for expansion of its own ETC designated area. See **Attachment CH-R2**.

13 All that said, LTD takes its customer service obligations seriously. If actual, verified  
14 concerns arise based on evidence in Indiana, this Commission has authority to investigate  
15 and remedy them – but it should not deny LTD's ETC designation on the speculation that  
16 LTD will not render satisfactory service quality and customer service.

17 Q. PLEASE COMMENT ON MR. GREENE'S SUGGESTION THAT THE  
18 COMMISSION SHOULD DENY LTD'S ETC DESIGNATION REQUEST  
19 BECAUSE LTD DOES NOT HAVE THE TECHNICAL AND FINANCIAL  
20 ABILITY TO MEET ITS OBLIGATIONS TO DEPLOY SERVICE SUPPORTED  
21 BY RDOF FUNDS.

22 A. Mr. Greene has already admitted that, by awarding RDOF funding to winning bidders, the  
23 FCC has determined that the winning bidders have the legal, financial and technical ability

1 to build the projects for which RDOF funding was awarded. New Lisbon has a pending  
2 IURC petition in Cause No. 41052 ETC 75S1 for expansion of its ETC area (the  
3 “Expansion Petition”) in connection with the successful RDOF Phase I bid of a Consortium  
4 to which New Lisbon belonged. In the Expansion Petition, New Lisbon states “...the  
5 Consortium allocated the RDOF Phase I support winning census block groups to multiple  
6 members of the Consortium, including the assignment of a census block group to New  
7 Lisbon for a total of \$393,412 in RDOF Phase I funding over 10 years.” Cause No. 41052  
8 ETC 75S1 Petition at 4. Notably, Mr. Greene’s testimony in that proceeding states: “Based  
9 upon its Form 183 short-form application, the FCC determined that the Consortium  
10 members, including New Lisbon, met the legal, technical and financial qualifications to  
11 participate in Auction 904 and to meet the service requirements associated with the  
12 performance tier and latency combination(s) on which the Consortium bid during Auction  
13 904.” Cause No. 41052 ETC 75S1, John Greene Testimony at 6. Mr. Greene further  
14 observed that, as evidenced by the FCC’s selection of the Consortium as a winning bidder  
15 in Auction 904, the FCC is satisfied, based upon the financial information provided, that  
16 the Consortium, including New Lisbon, is financially capable of providing the required  
17 services. Cause No. 41052 ETC 75S1, John Greene Testimony at 8.

18 The same is true for LTD. The FCC has already determined that LTD meets the  
19 legal, technical and financial qualifications to participate in the RDOF auction and to meet  
20 the service requirements associated with the performance tier and latency combination(s)  
21 on which LTD bid.

22 **Q. MR. GREENE CONTENDS THAT LTD HAS NOT DEMONSTRATED IT HAS**  
23 **THE TECHNICAL CAPABILITY TO DELIVER THE GIGABYTE SERVICE TIER**

**IT BID FOR NOR THE MANAGERIAL CAPABILITY TO PROVIDE PROMPT  
AND THOROUGH CUSTOMER SERVICE. PLEASE RESPOND.**

A. Mr. Greene speculates that LTD “appears to be a very small company owned by a single individual. LTD's corporate office address appears to be a residential home in a suburban neighborhood in Las Vegas, NV.” He states that “[a]s recently as February 25, 2019, LTD requested (and was later granted) a waiver of the CAF Phase II Auction deadline for filing audited financial statements on the grounds that it was a small business with a limited number of employees and administrative resources, that it was not audited in the ordinary course of business, and that its efforts to retain and engage accountants within the required time frame were unsuccessful. He claims LTD has not provided evidence in this proceeding or in its CTA application pending in Cause No. 45519 that LTD has sufficient human capital to engineer, construct and operate FTTH to serve all of the census blocks for which it has won RDOF funding in Indiana.

Here again, Mr. Greene is attempting to impart the RLEC business model on an entrepreneurial company. Mr. Greene’s allegations that LTD has a small staff and limited resources is false. LTD has employees in 23 states. LTD has engaged with outside engineering and construction companies and is positioning resources to begin construction. In addition to partnering with contractors, LTD is preparing to hire and train over 500 construction staff including many local workers in Indiana. LTD is recruiting seasoned outside plant professionals that agree with LTD’s vision of an entrepreneurial approach to fiber deployment. LTD also has scaled its staffing to meet its CAF performance obligations and there is no reason to believe LTD will not do the same with respect to RDOF. But to be fully staffed at this time would be a waste of resources.

1           Mr. Greene is similarly misguided regarding LTD's audited financial statements.  
2           LTD has audited financial statements dating back nine years. LTD paid to generate audited  
3           financials for 2012-2014 when LTD was a provisional awardee in the FCC Rural  
4           Broadband Experiments reverse auction. LTD's FCC waiver request cited by Mr. Greene  
5           was a request for a short delay to accommodate the time required by our auditing firm to  
6           complete the audited financial statements for the relevant time period. The FCC granted  
7           LTD's waiver request and LTD completed the audit within the revised timeframe. LTD's  
8           business processes are established to generate annual audited financials to meet the  
9           requirements for the next 8 years as part of CAF Phase II 2, over the 10 year horizon to  
10          comply with RDOF requirements, and beyond as we grow to serve over 1 million  
11          subscribers. In LTD's Indiana CTA proceeding, LTD has supplied the Commission with  
12          its confidential financial information that shows LTD has the financial capability to operate  
13          as an Indiana communications service provider and, should the Commission request them,  
14          LTD stands ready to supplement its filing with its most current available audited financials.

15          Mr. Greene neglects to mention that LTD has nearly completed its CAF Phase II  
16          buildout and is on track to provision service on time and potentially ahead of schedule. In  
17          fact, LTD is far ahead of most CAF Phase II winners in completing its obligations. LTD  
18          completed its 5th year obligation of 80% buildout in both Iowa and Minnesota by the end  
19          of year 1. That is four years ahead of the CAF Phase II requirement, which was to complete  
20          80% by the end of year 5. LTD will also finish 100% of its CAF Phase II obligation for  
21          Illinois later this year - also 4 years ahead of schedule.

22   **Q. PLEASE RESPOND TO MR. GREENE'S CLAIMS THAT LTD DOES NOT OWN**  
23   **ANY INFRASTRUCTURE IN INDIANA OR ILLINOIS, SUGGESTING THAT**

**LTD DOES NOT HAVE SUFFICIENT INFRASTRUCTURE AND STAFFING TO  
UNDERTAKE THIS LARGE FIBER DEPLOYMENT PROJECT INDIANA.**

**A.** Without any personal knowledge of LTD's capabilities, Mr. Greene sounds the alarm that LTD will be unable to fulfill its fiber deployment in Indiana. He questions LTD's ability to: procure construction services in Indiana; source fiber materials; establish middle mile connections; secure adequate skilled staffing to oversee construction, connections and maintenance; and negotiate fiber lease agreements. LTD has years of experience in growing both its workforce and network at a rapid pace. As an example, in 2020, LTD constructed 395 new tower sites and increased its workforce by over 30%. LTD has no affiliates and will partner with appropriate engineering, construction and fiber companies to construct the network necessary to satisfy its RDOF obligations in Indiana. LTD has sufficient experience, resources and relationships to provision service and will not rely on partners to provide service to customers once its network is constructed.

**Q. DO YOU AGREE WITH MR. GREENE'S SUGGESTION THAT LTD HAS  
FAILED TO PROVIDE DETAIL ON HOW IT WILL DEPLOY GIGABIT  
SERVICE IN INDIANA?**

**A.** No. Mr. Greene implies that the Commission should deny LTD's ETC designation request because LTD has not provided project plans or a feasibility study for its project buildout. But that is not required by law, and it has not been required for other Indiana ETC applicants that won RDOF bids. The broadband speeds LTD currently makes available to customers has nothing to do with its commitment to offer Gigabit speeds over fiber under its RDOF commitment. LTD has no current legal requirement to offer Gigabit speeds; rather, it offers service tiers that are suitable to meet consumer demand in the communities it serves. That

1 it does not currently offer Gigabit service does not mean that it is not “reasonably capable”  
2 of doing so as its RDOF authorization will require. Further, there is nothing in the FCC’s  
3 rules or auction procedures that require LTD to have offered Gigabit speeds to be eligible  
4 to apply for and obtain RDOF support to provide Gigabit fiber service. Unlike Gigabit  
5 fixed wireless, where Commission staff considered eligibility on a case-by-case basis, the  
6 auction procedures do not require any applicant to have deployed fiber to be eligible to bid  
7 for the Gigabit fiber tier. Mr. Greene’s examination of LTD’s current service plans has no  
8 bearing on the Commission’s consideration of the technical aspects of LTD’s ETC Petition.

9 **Q. PLEASE PROVIDE ADDITIONAL INFORMATION ABOUT THE TIER AND**  
10 **LATENCY ASSOCIATED WITH LTD’S INDIANA SERVICE.**

11 **A.** In their April 14, 2021 Docket Entry questions, the Presiding Officers asked LTD to  
12 confirm the tier and latency of broadband service that Petitioner committed to provide in  
13 all areas in which it was awarded RDOF funding. LTD will provide 1000/500 Mbps low  
14 latency service in all areas where it has been awarded RDOF funding.

15 **Q. PLEASE ADDRESS MR. GREENE’S TESTIMONY REGARDING LTD’S**  
16 **DEFAULT FOLLOWING THE CAF PHASE II AUCTION.**

17 **A.** Following the CAF Phase II Auction, LTD decided not to accept an award for one single,  
18 small census block in each of Nebraska and Nevada where LTD decided that the  
19 compliance costs would be largely disproportionate to the small area to be served. Rather  
20 than accepting the award and defaulting later, LTD chose to pay the FCC a total of \$3,563  
21 rather than spend tens of thousands of dollars on compliance and construction servicing  
22 two small areas. Many other CAF Phase II applicants chose to do the same for very small

1 areas. This is in fact the opposite of LTD not knowing what it is doing - it  
2 exemplifies prudent business practice.

3 **Q. WAS LTD THE ONLY CARRIER TO DECLINE AN AWARD BASED ON THE**  
4 **COMPLIANCE COSTS RELATIVE TO THE AWARD AMOUNT OR**  
5 **FOOTPRINT?**

6 **A.** No. The table below lists the CAF defaults from decisions the FCC released in October  
7 2019. A number of other bidders, including at least one RLEC, made the same choice as  
8 LTD to voluntarily default on bids they believed were not viable. Unlike some winning  
9 bidders, LTD accepted its CAF obligations in other states and is meeting its deployment  
10 obligations.

CAF II Winner	Proposed Forfeiture	Default Reason
Hanson Communications	\$6,000	Due to misunderstanding of post-auction requirements, was not able to timely obtain and submit all documentation required by long form
Total Highspeed, LLC	\$30,000	Did not file long form after winning bids; decided it did not plan to proceed with CAF II
NE Colorado Cellular, Inc.	\$4,383	Inability to build out because it could not timely obtain ETC designation in Kansas
Crocker Communications	\$6,000	Voluntary withdrew because project no longer economically feasible.
MGW Networks, LLC	\$6,000	Voluntarily withdrew because not in best economic interest to move forward
Fidelity Communications Company	\$3,641	Voluntarily withdrew because could not find unserved locations in the CBG and did not make economic sense to proceed
LTD Broadband, LLC	\$3,563	Did not obtain ETC Designation for two CBGs
Workable Programs & Systems, Inc.	\$16,200	Unable to obtain the Letter of Credit Commitment Letter
Pine Cellular Phones, Inc.	\$16,750	Voluntarily withdrew for "economic reasons"
Farmers Mutual Telephone Company	\$3,000	Voluntarily withdrew because 95 of 98 winning areas were already in ILEC service territory and default was most cost-effective resolution
Townes Wireless, Inc.	\$9,504	Financial difficulties supporting the winning areas
Johnson Telephone Company	\$3,000	No explanation given
Syncwave, LLC	\$1,242	Did not file its long form

**Q. DOES LTD's CAF PHASE II DEFAULT SUGGEST THAT LTD WILL DEFAULT ON ITS RDOF OBLIGATIONS IN INDIANA?**

**A.** Absolutely not. LTD acted responsibly in CAF Phase II by notifying the FCC early that LTD would not proceed with the projects based on the cost to benefit analysis. As I discussed above, LTD has met the remainder of its CAF Phase II obligations and is ahead of schedule in many areas. Due to the nature of the auction, a bidder does not know during various bidding rounds whether it will win a particular census block group. As a result, winners may not find out until the final round of bidding whether and where they will win. This can create anomalies where bidders end up winning areas that were geographically



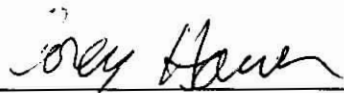
1 attractive clusters during the auction but which are separated by other bidders. Also, in the  
2 final round, where multiple bidders are tied, the FCC's bidding system randomly selects  
3 the winner, another feature that may lead to unusual results. Like other CAF applicants that  
4 defaulted, LTD reasonably determined that defaulting prior to receiving support was  
5 preferred over accepting support and facing challenges disproportionate to the buildout  
6 obligations. In Indiana, LTD has no intention of defaulting. LTD has already performed  
7 its cost benefit analysis and I affirm that LTD is ready, willing and able to build out service  
8 in the Indiana RDOF award areas. Since LTD has demonstrated that it meets all of the  
9 criteria for ETC designation in Indiana, I respectfully request that the Commission grant  
10 LTD's request.

11 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

12 **A.** Yes.

**VERIFICATION**

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

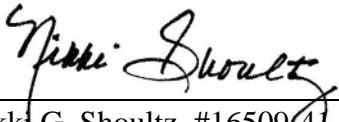
  
\_\_\_\_\_  
Corey Hauer

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing has been served upon the following counsel of record electronically this 16<sup>th</sup> day of April, 2021:

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Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of	)	
	)	
<b>LTD Broadband, LLC</b>	)	AU Docket No. 20-34
	)	WC Docket No. 19-126
Petition to Deny Long Form Applications	)	WC Docket No. 10-90
(FCC Forms 683) for Rural Digital Opportunity	)	
Fund (“RDOF”) Phase I Auction Support in the	)	
States of Minnesota and Iowa	)	
To: The Commission		

**OPPOSITION TO PETITION TO DENY**

**LTD BROADBAND, LLC**

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April 1, 2021

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**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
<b>LTD Broadband, LLC</b>	)	AU Docket No. 20-34
	)	WC Docket No. 19-126
Petition to Deny Long Form Applications	)	WC Docket No. 10-90
(FCC Forms 683) for Rural Digital Opportunity	)	
Fund (“RDOF”) Phase I Auction Support in the	)	
States of Minnesota and Iowa	)	
To: The Commission		

**OPPOSITION TO PETITION TO DENY**

LTD Broadband, LLC (“LTD”), by counsel and pursuant to Section 1.45(b) of the Commission’s Rules, hereby opposes the unauthorized Petition to Deny (“Petition”) filed on March 22, 2021 by the Minnesota Telecom Alliance and the Iowa Communications Alliance (“MTA/ICA”) in the above-referenced dockets. The Petition seeks denial of LTD’s Auction 904 long-form application (“Application”) seeking Rural Digital Opportunity Fund (“RDOF”) Phase I support for designated census blocks in Minnesota and Iowa. The Commission should dismiss the Petition and, consistent with established procedures approved by a unanimous Commission, continue to thoroughly vet LTD’s Application to determine whether it is qualified to receive RDOF support.

**Introduction and Summary**

MTA/ICA join an off-key chorus of unsuccessful bidders disappointed in the outcome of the RDOF auction. Instead of re-examining their members’ bidding strategies, MTA/ICA pick out the winner of the largest amount of RDOF support and, relying on speculation, innuendo and surmise, call into question its financial and technical qualifications. They do so without any knowledge of LTD’s financial or technical qualifications or the contents of its Application, and,

tellingly, fail to include an affidavit or declaration under penalty of perjury to support their hollow claims; rather, they seem content to fling disparaging allegations against LTD that have no basis in fact and – to cover up the obvious flaws in their arguments – seek to shift the burden to LTD to try to prove what they cannot. The Commission should see past this gambit and dismiss the Petition.

## **Discussion**

### **I. THE PETITION IS PROCEDURALLY DEFECTIVE**

As MCA/ITA concede, there are no rules or procedures that authorize the filing of petitions to deny RDOF long-form applications.<sup>1</sup> Under the Communications Act, a petition to deny serves a specific purpose with respect to the Commission’s consideration whether an application for license to operate a transmitting station would serve the public interest.<sup>2</sup> Under Section 310(b)(2)(F), the Commission has also extended such procedures to applications to operate as a common carrier under Section 214 of the Act.<sup>3</sup> But it has made no such provision for applications filed under Sections 1.21004 or 54.804 seeking to finalize support provisionally obtained under competitive bidding procedures for the Connect America Fund (“CAF”) and RDOF.<sup>4</sup>

Indeed, in crafting its RDOF rules and procedures, the Commission clearly intended to preclude competing and unsuccessful bidders from seeking denial of a successful bidder’s

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<sup>1</sup> See Petition at 1.

<sup>2</sup> See 47 U.S.C. § 309(b) & (d) (“Any party in interest may file with the Commission a petition to deny any application (whether as originally filed or as amended) to which subsection (b) of this section applies,” where Section 309(b) applies to any “instrument of authorization” to operate certain types of transmission facilities, including those in the broadcasting and common carrier services as well as specifically enumerated types of aeronautical licenses).

<sup>3</sup> See 47 C.F.R. § 63.20.

<sup>4</sup> See 47 C.F.R. §§ 1.21004 and 54.804 (no provision for petitions to deny); *compare* 47 C.F.R. § 1.2108 (establishing specific petition to deny procedures for long-form applications filed following spectrum license auctions).

application. For example, in its *Report & Order* adopting these rules, it specifically rejected a proposal advanced by several commenters to “adopt a protective order to allow for access to long-form applications” stating that it was “not persuaded” that it “should allow outside parties to review confidential information in the winning bidders’ applications.”<sup>5</sup> Such a process would lead to a Gordian Knot of litigation, with no barriers on the filing of petitions like the one MTA/ICA have filed. The Commission observed that “very few commenters addressed the Commission's proposed post-auction long-form application processes and none of those commenters raised significant concerns,” including with respect to the absence of provisions for petitions to deny.<sup>6</sup> The Commission expressed its view that these rules facilitated “the Commission's ability to determine whether the applicants are ultimately eligible for Rural Digital Opportunity Fund Support authorization funding, providing a fair and efficient review process.”<sup>7</sup> As it made plain in the subsequent Public Notice in which the winning bidders in Auction 904 were announced:

If the application and the information with respect to each winning bid in a particular state is complete and the long-form applicant has demonstrated that it is technically and financially qualified, WCB will release a public notice identifying the applicant and the winning bids for which the Commission is ready to authorize Rural Digital Opportunity Fund support.<sup>8</sup>

This simple process, relying on the Commission’s extensive staff experience and expertise, is all that is required, and avoids a lengthy, litigious process driven by the asserted grievances of unsuccessful bidders.

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<sup>5</sup> *Rural Digital Opportunity Fund; Connect America Fund*, 35 FCC Rcd 686, 725 (¶ 86) & n.248 (2020) (“*Report and Order*”).

<sup>6</sup> *Id.* at 725 (¶ 86).

<sup>7</sup> *Id.*

<sup>8</sup> *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021*, Public Notice, 35 FCC Rcd 13888 (¶ 35) (WCB/OEA 2020).



While the Commission can entertain informal objections under Section 1.41 of its rules,<sup>9</sup> it is under no obligation to do so,<sup>10</sup> particularly given the prudential concerns outlined above. Using an informal objection to achieve what the rules do not otherwise permit, and indeed implicitly reject, would nullify the Commission's procedural rules. Moreover, the Commission cannot shift the burden of proof to LTD as part of this proceeding, as MTA/ICA argue.<sup>11</sup> It is a threshold requirement for petitions to deny and informal objections alike that the petitioner/objector make a showing that "grant of the application would be *prima facie* inconsistent with" the public interest and that these "allegations of fact shall, except for those of which official notice may be taken, be supported by affidavit of a person or persons with personal knowledge thereof."<sup>12</sup> MTA/ICA meet neither of these criteria; indeed, they've not even attempted to satisfy these requirements. As further detailed below, its pleading consists of nothing more than conjecture, surmise and innuendo. The Petition should be dismissed on this basis alone.

## **II. THE PETITION PRESENTS NO EVIDENCE WARRANTING DENIAL OF LTD'S APPLICATION**

Assuming *arguendo* the Petition survives its serious procedural defects, its substantive claims fare no better. Reduced to its essence, the Petition resorts to rampant speculation in a transparent and anticompetitive effort to oust LTD from the long-form review process and deny

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<sup>9</sup> 47 C.F.R. § 1.41.

<sup>10</sup> See, e.g., *Touchtel Corporation*, 29 FCC Rcd 16249, 16251 (¶ 7) (Broad. Div. 2014) ("the Commission has discretion whether or not to consider an informal objection").

<sup>11</sup> Petition at 3.

<sup>12</sup> 47 U.S.C. §309(d)(1) & (a); *KHNL/KGMB License Subsidiary, LLC and HITV License Subsidiary, Inc.*, 33 FCC Rcd 12785, 12795 (¶ 21) n.77 (2018) ("The Commission applies a two-step analysis to a petition to deny (or informal objection) under the public interest standard. First, it must determine whether the petition contains specific allegations of fact sufficient to show that granting the application would be *prima facie* inconsistent with the public interest"), citing *Astroline Communications Co., Ltd. Partnership v. FCC*, 857 F.2d 1556 (D.C. Cir. 1988).

consumers in Minnesota and Iowa the benefits of Gigabit broadband service. Though unstated, MCA/ITA must be motivated by the chance that, if LTD's Application is denied, their members will get a second opportunity in RDOF Phase II to bid on the census blocks that LTD won. That is contrary to the policies underpinning RDOF – to support future-proofed networks to unserved rural Americans.<sup>13</sup>

Much of what MCA/ITA argues can be dismissed as irrelevant to the Commission's consideration of LTD's Application. The broadband speeds LTD currently makes available to customers has nothing to do with its commitment to offer Gigabit speeds over fiber under its RDOF commitment.<sup>14</sup> LTD has no current legal requirement to offer Gigabit speeds; rather, it offers service tiers that are suitable to meet consumer demand in the communities it serves. That it does not currently offer gigabit service also does not mean that it is not "reasonably capable" of doing so as its RDOF authorization will require.<sup>15</sup> Further, there is no requirement in the Commission's rules or auction procedures that require LTD to have offered Gigabit speeds to be eligible to apply for and obtain support to provide Gigabit fiber service. Unlike Gigabit fixed wireless, where Commission staff considered eligibility on a case-by-case basis,<sup>16</sup> the auction procedures do not require any applicant to have deployed fiber to be eligible to bid for the Gigabit fiber tier. MTA/ICA's examination of LTD's current service plans has no bearing on the Commission's consideration of the technical aspects of its Application.

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<sup>13</sup> *See Report and Order.*

<sup>14</sup> *See* Petition at 3 ("LTD does not presently offer residential broadband speeds anywhere close to the RDOF Gigabit service tier").

<sup>15</sup> *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirement and Other Procedures for Auction 904*, Public Notice, 35 FCC Rcd 6077, 6099 (¶ 64) (2020) ("*RDOF Auction Procedures Public Notice*") ("Reasonably capable" refers to the Commission staff's reasonable expectation that the applicant can meet those obligations.").

<sup>16</sup> *Id.* at 6113 (¶ 100).

Also irrelevant is MTA/ICA's speculation that, as a small company, LTD Broadband may not be equipped to handle the obligations attendant to RDOF support authorization.<sup>17</sup> Whether there is any "indication" that LTD is "now able to engineer, construct and operate FTTH or other predominantly fiber optic networks"<sup>18</sup> assumes that LTD would have revealed its capabilities to MTA/ICA or that a backward-looking analysis of its size is somehow relevant to its future plans to deploy Gigabit tier service. Did MTA/ICA ever bother to ask LTD about its capabilities or plans? Of course not – it instead decided to remain uninformed and rely on innuendo so it could more easily cast aspersions on LTD.

MTA/ICA also point to LTD's default in two states following the Connect America Fund ("CAF") Phase II auction and its unsuccessful bid for Rural Broadband Experiment ("RBE") support.<sup>19</sup> As MTA/ICA point out, LTD won only a single census block group in each of Nebraska and Nevada and determined that it would not be economically prudent to accept support in those two states for such small areas given the costs of compliance. Like other CAF applicants that defaulted, LTD reasonably determined that defaulting prior to receiving support was preferred over accepting support and facing challenges disproportionate to the buildout obligations. That LTD was unsuccessful in its RBE bid seven years ago also has no adverse impact on its qualifications here. However, LTD notes that, in contrast to MTA/ICA, LTD did not, as an unsuccessful applicant in that process, challenge the authorization of support to RBE recipients without having any knowledge of the contents of their winning bids.

Interestingly, MTA/ICA state that "LTD has been criticized by the Minnesota Department of Commerce" ("DOC") for allegedly failing to advertise Lifeline service.<sup>20</sup> This is

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<sup>17</sup> See Petition at 4.

<sup>18</sup> *Id.*

<sup>19</sup> See *id.* at 4-5.

<sup>20</sup> *Id.* at 5.

the same state agency that, on March 26, 2021, “recommends approval of the carrier’s petition for designation as an ETC in locations designated for the receipt of its RDOF award.”<sup>21</sup> Like other ETC applicants discussed in the Comments, DOC stated that “LTD should be subject to the conditions established by the Commission for all petitioners.”<sup>22</sup> DOC did not recommend additional conditions, as it did with certain of the other Minnesota ETC applicants. Plainly, DOC does not view any purported non-compliance with Lifeline obligations to be an impediment to grant of LTD’s ETC application, and neither should the Commission, to the extent it even has authority to do so.

Digging deeper into the depths of disparagement, MTA/ICA attack LTD’s purported service record, citing a Better Business Bureau review.<sup>23</sup> It apparently believes that the mere existence of 14 customer complaints, by itself and without any elaboration as to the substance of the complaints, is somehow excessive. But MTA/ICA fail to compare LTD’s customer service reputation with their own members’ or to explain that a small sample of nine reviews is significant enough to raise questions that should result in denial of LTD’s Application. MTA/ICA also ignore other sources of customer reviews such as Google, where LTD has a 4.44-star rating based on 81 customer reviews.<sup>24</sup> All that said, however, the Commission’s long-form review procedures do not consider customer reviews – there are post-authorization requirements regarding specific program requirements that the states and the Commission can enforce.

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<sup>21</sup> Comments of the Minnesota Department of Commerce on the petitions filed by Rural Digital Opportunity Fund Grant Winners, Docket No: P999/C1-21-86 (filed March 26, 2021) at 19.

<sup>22</sup> *Id.*

<sup>23</sup> See Petition at 6.

<sup>24</sup> See <https://broadbandnow.com/LTD-Broadband> (last visited March 28, 2021). A sample of customer reviews: “We have had excellent service;” “I would recommend this service to those outside the conventional internet providers;” “Overall, it’s been the best Internet service for rural areas that we’ve ever had;” “I recommend LTD Broadband to anyone! I love the hometown feeling of a local company. For the price and the product that you get, it’s an amazing deal.”

Notably, MTA/ICA cite no instances where the state of Minnesota has acted on any complaints it may have received concerning LTD's compliance with state ETC requirements and consumer protection laws.

Perhaps the nadir of MTA/ICA's Petition is its reliance on entirely anonymous hearsay in its assertion that "MTA has heard reliable reports that LTD has approached at least one engineering firm to develop its Minnesota RDOF fiber network, and been told that the engineering firm had nowhere the available capacity to handle the LTD project on top of its existing clients and commitments."<sup>25</sup> MTA/ICA do not identify the source of its admitted "hearsay,"<sup>26</sup> the name of MTA's member who apparently "heard" it, when the report was allegedly "heard," the circumstances giving rise to this "report" (i.e., whether it was solicited by MTA), or the name of the "engineering firm" that is referenced. Nor did MTA/ICA submit an affidavit or declaration under penalty of perjury to support this rumor, as is required to document such allegations. Moreover, it is irrelevant that "MTA is aware of no evidence whatsoever that LTD possesses the technical, operational or administrative staff resources to build and run"<sup>27</sup> its RDOF network in Minnesota – MTA is not supposed to know, just as LTD is not entitled to see "evidence" of any other auction winners' resources, including those of MTA/ICA members. It is the Commission's job, consistent with the *RDOF Auction Procedures Public Notice*, to undertake a comprehensive review of the Application, and LTD stands ready to engage with Commission staff over the next several months to demonstrate its qualifications, including its staffing plans.

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<sup>25</sup> Petition at 6.

<sup>26</sup> *Id.* ("MTA is not asserting that LTD's Long Form application(s) should be denied on the basis of assumptions or industry hearsay.").

<sup>27</sup> *Id.*

Admitting that they “do not have access to LTD’s financial statements,”<sup>28</sup> MTA/ICA nevertheless contend that LTD “appears to face a very substantial financial hurdle to build its Minnesota and Iowa RDOF broadband networks.”<sup>29</sup> It then offers construction cost estimates, claiming without citing any source that they are “reasonable,”<sup>30</sup> and states that “it is a relatively safe bet that LTD does not have liquid assets anywhere near the size of the amount needed.”<sup>31</sup> Taking another step into fantasyland, MTA/ICA suggest that is “unlikely” that LTD will be able to sell a non-controlling interest because its support level is “so low that most potential minority investors will not be able to expect sufficient returns to make the investment attractive.”<sup>32</sup> One cannot avoid noticing the circumspection in words like “appears,” “relatively safe bet,” “unlikely” and “most.” Nor can one escape the obvious lack of any factual support for these statements and – once again – the absence of any sources or declaration under penalty of perjury.

LTD notes an inherent hypocrisy in the Petition. On one hand, MTA/ICA ask the Commission to:

place a substantial and stringent burden of proof on LTD to demonstrate reasonable, workable and detailed technical plans for constructing and operating its RDOF broadband networks (including existing or substantially negotiated arrangements with vendors, lessors and transport providers), and to show that it has clear and certain access to the financial resources necessary to meet the realistic and detailed costs of such technical plans.<sup>33</sup>

In making this request, albeit with no factual basis, MTA/ICA ask the Commission to impose on LTD (but not other applicants) and on its own staff more stringent long-form review obligations

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<sup>28</sup> *Id.* at 7.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

<sup>32</sup> *Id.* MTA/ICA present no information that they have contact “potential minority investors” to determine that “most” would not find the investment attractive. In the absence of any evidence, statements such as this can be given no credibility whatsoever.

<sup>33</sup> *Id.* at 8.

that are not part of the auction procedures the Commission unanimously approved before the auction. The notion of having “substantially negotiated arrangements” is not required.<sup>34</sup> As for “clear and certain access to financial resources,”<sup>35</sup> the auction procedures impose a different standard, requiring an applicant to “certify in its long-form application that it is financially and technically capable of meeting the relevant public interest obligations for each performance tier and latency combination in the geographic areas in which it seeks support.”<sup>36</sup> Commission staff, relying on its experience and expertise, will then determine if the applicant is “reasonably capable” of meeting its performance obligations. Applicants also must submit a letter of credit commitment letter, an irrevocable standby letter of credit and a bankruptcy opinion letter before RDOF support can flow, requirements that ensure the applicant has formed an independent relationship with a qualified banking institution and that the Commission can recover funds under the letter of credit if the applicant becomes bankrupt.

But in the next breath, MTA/ICA cite “rumors in the trade press” – not attributed to LTD or, for that matter, any other RDOF applicant – that “some” auction winners “may be asking or planning to ask the Commission to change the RDOF auction rules retroactively to allow them to receive support for broadband speeds less than the Gigabit services that they bid upon and ‘won.’”<sup>37</sup> Such uncited “rumors” about “plans” of “some” RDOF auction winners cannot be the basis to deny LTD’s Application. At best, MTA/ICA’s prediction about what may happen in the future is entirely speculative. At worst, its proposal to impose unauthorized obligations on LTD but oppose possible, future efforts to change or waive the rules is hypocritical.

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<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> *RDOF Auction Procedures Public Notice* at 6166 (¶ 298).

<sup>37</sup> *Petition* at 8-9.

It may be true that “[i]n Minnesota and Iowa, MTA and ICA members were ready, willing and able to provide the Gigabit service tiers that they proposed.”<sup>38</sup> So was LTD, and it was willing to bid in a manner that enabled it to succeed in the auction while certain unnamed members of MTA and ICA fell short of their own aspirations. That is the nature of auctions – some win and others lose. But that is not an open invitation for unsuccessful applicants to try to spin gold from the brittle straws of speculation, innuendo, and rumor to openly attack a successful party that will be subject to thorough and rigorous Commission staff review. The Commission should not allow the MTA/ICA smear campaign to distract its staff from the work it has ahead to review all RDOF applicants’ long-forms consistent with the procedures the Commission unanimously adopted and upon which all applicants relied.

### **Conclusion**

The Petition is a blatant attempt by disappointed auction participants to tarnish LTD’s Application amid ongoing staff review. It is rare to see a petition to deny have no basis in fact and rely solely on conjecture, innuendo, and rumor, with no supporting documentation and no declaration under penalty of perjury. The Petition should be dismissed or denied.

Respectfully submitted,

**LTD BROADBAND, LLC**

April 1, 2021

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<sup>38</sup> *Id.* at 9.



**CERTIFICATE OF SERVICE**

I, Stephen E. Coran, hereby certify that on this 1<sup>st</sup> day of April, 2021, a true and correct copy of the foregoing Opposition to Petition to Deny was sent by electronic mail to the following:

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<b>Confirmation #:</b>	20210401974028886
<b>Submitted:</b>	Apr 1, 2021 9:42:42 AM
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<b>Name(s) of Filer(s)</b>	LTD Broadband, LLC
<b>Law Firm(s)</b>	Lerman Senter PLLC
<b>Attorney/Author Name(s)</b>	Stephen E. Coran, David S. Keir
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<b>Type of Filing</b>	OPPOSITION
<b>File Number</b>	
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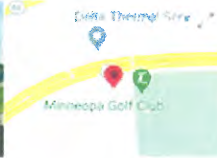

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**Attachment CH-R1**  
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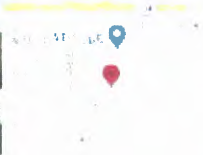

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★★★★★



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★★★★★

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6 months ago

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1



**Brittany Watkins**

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1 review

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Terrible service the internet always slow and the haven't tried fixing anything



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great service for our area!



Like



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★★★★★ 5 years ago

Very friendly staff. Whenever you call you can expect to get the best and friendliest service around. Reliable service and if you ever have a problem they address it as soon as possible! Great people!



Like



**K Jackson**

2 reviews

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1





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the worst



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Nice



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Great place



**Witty Heathen**

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29 reviews



5 years ago



**Debbie Bell**

2 reviews



3 years ago

