

OFFICIAL
EXHIBITS

FILED
March 19, 2021
INDIANA UTILITY
REGULATORY COMMISSION

**BEFORE THE
INDIANA UTILITY REGULATORY COMMISSION**

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

IURC
PETITIONER'S
EXHIBIT NO. 2
5-3-21 AT
DATE REPORTER

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

March 18, 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. PLEASE DESCRIBE YOUR EDUCATION AND EMPLOYMENT**
5 **BACKGROUND.**

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

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 **A.** The purpose of my testimony is to support the Company's application (Application) for
14 designation as an Eligible Telecommunications Carrier (ETC) so that LTD Broadband
15 can receive support through the Federal Communications Rural Digital Opportunity Fund
16 (RDOF) program to build out and operate broadband networks throughout unserved and
17 underserved areas in the State of Indiana.

18 **Q. ARE YOU FAMILIAR WITH DETAILS OF THE COMPANY'S APPLICATION**
19 **AND OTHER DOCUMENTS FILED IN THIS PROCEEDING?**

20 **A.** Yes, I authored the Application, including the related attachments, and can verify the
21 accuracy of the content in these materials. I would like to incorporate those documents
22 and the information presented therein into this testimony by reference.

1 **Q. WHAT AUTHORITY DOES LTD BROADBAND SEEK IN ITS APPLICATION?**

2 **A.** LTD Broadband requests that the Indiana Utility Regulatory Commission (Commission)
3 grant it designation as an ETC in the Company's proposed Indiana service area for
4 purposes of receiving support from the federal Universal Service Fund (USF), including
5 support through the FCC's high-cost USF program. Specifically, LTD Broadband seeks
6 designation in order to receive funding awarded to the Company through the recently
7 completed RDOF Phase I Auction to deploy broadband and voice communications in
8 certain census blocks in Indiana. In order to comply with the FCC's requirements for
9 RDOF Phase I awardees, the Company respectfully requests the Commission issue an
10 Order in this proceeding on or before June 7, 2021.

11 **Q. DOES LTD BROADBAND REQUEST ETC DESIGNATION SOLELY FOR HIGH**
12 **COST PURPOSES?**

13 **A.** LTD Broadband's primary purpose in the Application is to obtain ETC designation in
14 order to receive support through the federal high-cost fund; however, the Company
15 understands that federal high-cost ETCs are required also to participate in the federal low-
16 income (Lifeline) program and to offer qualifying Lifeline service plans to eligible
17 consumers. Consequently, LTD Broadband seeks designation as an ETC to operate
18 within, and receive funding from, both the RDOF and Lifeline federal USF programs.

19 **Q. PLEASE DESCRIBE LTD BROADBAND AND ITS OPERATIONS.**

20 **A.** LTD Broadband is a privately-held limited liability company formed in the State of
21 Nevada in October 2010. The Company's principal place of business is 69 Teahouse St,
22 Las Vegas NV 89138. I hold a 100% controlling interest (100%) in the Company.

1 LTD Broadband has grown from a single water tower site in Rose Creek, Minnesota in
2 2011 to a network of over 2150 broadcast sites covering over 50,000 square miles
3 servicing 16,000 customers. Currently LTD Broadband offers service in Iowa, Kansas,
4 Minnesota, Nebraska, South Dakota and Wisconsin. We are continuing rapid expansion
5 of our footprint averaging 30 new broadcast sites each month. LTD Broadband is also
6 overbuilding much of our existing fixed wireless footprint with 5G millimeter wave fixed
7 wireless equipment to enable gigabit speeds. We operate an extensive fiber network with
8 geographically dispersed redundant paths to insure maximum reliability and throughput to
9 our tower network. We believe we are one of the fastest if not the fastest growing and
10 largest providers (by coverage area) of fixed-wireless broadband in the US. For our
11 RDOF areas we intend to deploy FTTH in the last mile using GPON and XGPON
12 technology to offer speeds up to 10 Gbps. Middle mile connections may utilize multi-
13 gigabit fixed-wireless in certain instances.

14 **Q. PLEASE DESCRIBE THE COMPANY'S CURRENT CUSTOMER BASE.**

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

19 **Q. IS LTD BROADBAND CURRENTLY DESIGNATED AS AN ETC IN ANY**
20 **OTHER JURISDICTION?**

21 **A.** LTD Broadband is designated as an ETC in Illinois, Iowa and Minnesota. In addition to
22 Indiana, the Company is currently seeking ETC designation in 11 other jurisdictions
23 where it has been awarded RDOF funding: California, Colorado, Kansas, Missouri,

1 Nebraska, North Dakota, Ohio, Oklahoma, South Dakota, Texas and Wisconsin. The
2 Company's applications for ETC designation are currently pending before the relevant
3 regulatory commissions in those states.

4 **Q. DOES LTD BROADBAND CURRENTLY PROVIDE SERVICE IN INDIANA?**

5 **A.** LTD Broadband does not currently provide any services in the State of Indiana and its
6 Application for a Certificate of Territorial Authority is currently pending before this
7 Commission. To date, the Company's operations have focused on Iowa, Kansas,
8 Minnesota, Nebraska, South Dakota and Wisconsin.

9 **Q. PLEASE DESCRIBE THE RDOF AUCTION AND THE COMPANY'S WINNING**
10 **BID.**

11 **A.** The FCC established the RDOF as a continuation of its efforts through the Connect
12 America Fund to accelerate deployment of high-speed fixed broadband service to
13 unserved and underserved Americans in rural areas. Following the RDOF competitive
14 bidding process, the FCC issued its Public Notice on December 7, 2020, the FCC issued a
15 Public Notice announcing the results. LTD Broadband was awarded \$132,092,071.86 in
16 funding over ten years to serve a total of 528,088 locations in 15 states. In Indiana, the
17 Company was awarded \$5,445,691.79 over ten years to build out and operate a network
18 for advanced communications serving 31,330 locations in 756 census blocks, which are
19 described in Attachment 2 to the Company's Verified Application.

20 **II. COMPLIANCE WITH INDIANA REQUIREMENTS FOR ETC DESIGNATION**

21 **Q. PLEASE DESCRIBE LTD BROADBAND'S PROPOSED ETC SERVICE AREA.**

22 **A.** RDOF Phase I support is being awarded based on census blocks. As noted, LTD
23 Broadband was awarded support for 756 census blocks in Indiana. The Company

1 therefore requests that its ETC designation encompass a service area consisting of those
2 census blocks in Indiana where it has been awarded support by the FCC. LTD Broadband
3 provided a list of these census blocks and a map of Indiana identifying where the census
4 blocks are located within the state as Attachment 2 to its Application.

5 **Q. DOES LTD BROADBAND HAVE THE FINANCIAL AND TECHNICAL**
6 **CAPACITY TO PROVIDE THE LIFELINE SUPPORTED SERVICES?**

7 **A.** Yes. The Company has been operating as a successful provider of ETC
8 telecommunications and internet service for 1 year in three states. The biographies of the
9 Company's key management and the Company's financial information are included as an
10 attachment to the Company's CTA Petition in Cause No. 45519. The Company's
11 management team has sufficient administrative and technical expertise to effectively
12 manage its operations.

13 **Q. ARE YOU FAMILIAR WITH THE STATUTORY AND REGULATORY**
14 **REQUIREMENTS FOR DESIGNATION AS AN ETC?**

15 **A.** Yes. Section 214(e)(2) of the Communications Act of 1934, as amended, Act (the Act)
16 authorizes a state commission upon its own motion, or upon request, to designate a
17 common carrier to be an ETC for purposes of receiving universal service support under
18 the Act. My understanding is that a carrier thus designated must satisfy the requirements
19 of Section 214(e)(1). Basically, in order to qualify for designation, an applicant must be a
20 common carrier, must offer the services that are supported by the federal USF and must
21 advertise the availability of its supported services and the associated rates using media of
22 general distribution that are calculated to reach eligible consumers. I also understand that
23 the FCC's rules affirm and restate the requirements found in section 214(e)(1) of the Act.

1 I understand that both the Act and the FCC's rules further state that outside those areas
2 served by a rural telephone company, the Commission shall designate any common
3 carrier that satisfies the preceding requirements for a service area determined by the
4 Commission. In areas served by a rural telephone company, the Commission may
5 designate more than one common carrier as an ETC for a service area the Commission
6 designates, provided that the Commission shall find that such designation is in the public
7 interest.

8 **Q. DOES LTD BROADBAND MEET THE REQUIREMENTS OF THESE**
9 **STATUTORY AND ADMINISTRATIVE PROVISIONS?**

10 **A.** Yes it does. LTD Broadband holds common carrier wireless licenses from the FCC and
11 will provide service pursuant to its ETC designation on a common carrier basis. As
12 discussed below, the Company will provide supported services, as defined by the federal
13 USF program rules, using a combination of its own facilities and network assets leased
14 from third parties. LTD Broadband will advertise the availability of its supported services
15 using media of general distribution calculated to reach eligible consumers.

16 **Q. PLEASE DISCUSS THE TYPES OF SERVICES LTD BROADBAND INTENDS**
17 **TO OFFER IN INDIANA.**

18 **A.** Consistent with the requirements of the federal USF program rules, LTD Broadband
19 commits to provide (i) voice grade access to the public switched telephone network
20 (PSTN) or its functional equivalent; (ii) minutes of use for local service provided at no
21 additional charge to end users; (iii) access to emergency services; and (iv) toll limitation
22 services to qualifying low-income consumers as provided in accordance with 47 C.F.R.
23 §§54.400 *et seq.*

1 i. *Voice grade access to PSTN*

2 LTD Broadband will provide voice-grade access to the PSTN by providing
3 interconnected VoIP service throughout its designated service area. This plan complies
4 fully with the FCC's universal service rules and orders. In the 2011 USF Transformation
5 Order, the FCC established the CAF and found that its authority to promote universal
6 service did not depend on the classification of interconnected VoIP as a
7 telecommunications service or an information service and that "ETCs may use any
8 technology in the provision of voice telephony service." Currently, the Company provides
9 an extensive range of service offerings for residential, business and government
10 customers, including broadband Internet Access and VoIP, available at several price
11 levels and upload/download speeds.

12 At this time, LTD Broadband delivers retail plans with download speeds of up to
13 50 Mbps. Supported by RDOF funding, the Company expects to build networks that will
14 enable us to develop service plans with download speeds up to 100 Mbps. A summary of
15 LTD Broadband's current service offerings has been provided as Attachment 3 to its
16 Application. LTD Broadband expects to offer a similar selection of plans (albeit
17 incorporating improved upper-end download speeds) in Indiana.

18 ii. *Local Use Minutes*

19 "Local usage" means an amount of minutes of use of exchange services, prescribed by the
20 FCC, provided free of charge to end users." The FCC has not specified a minimum
21 amount of local usage that a wireline ETC must offer. LTD Broadband will meet the local
22 usage requirement by including unlimited local calling in its rate plans. The Company

1 commits to comply with any minimum local usage requirements adopted in future by the
2 FCC or by this Commission.

3 *iii. Access to Emergency Services*

4 LTD Broadband complies fully with the FCC's requirements for 911/E911 service
5 provided in connection with VoIP services. In particular, the Company complies with the
6 requirements of Section 9.5 of the FCC's rules. At the time of service installation, LTD
7 Broadband confirms with each subscriber the correct physical address (or Registered
8 Location) for the service. In addition, the Company notifies each subscriber about the
9 need to promptly update his or her Registered Location in the event the subscriber
10 changes locations, to ensure that future emergency calls are correctly routed. Subscribers
11 are made aware that this update can be easily achieved via a telephone call to customer
12 service or through the LTD Broadband customer portal. Finally, each subscriber is
13 informed that certain circumstances may interfere with emergency calls made using the
14 VoIP service, including, e.g., unreported changes to a subscriber's Registered Location,
15 power outages and broadband network connectivity loss. The Company currently
16 provides its VoIP customers with access to 911/E911 emergency services through an
17 arrangement with Inteliquent, a certified telecommunications carrier in Indiana.
18 Emergency calls from LTD Broadband customers are connected to Inteliquent's network
19 via high speed Session Interface Protocol (SIP) trunks at LTD Broadband's datacenters.
20 The SIP trunks are configured for High Availability IP to ensure maximum call
21 processing effectiveness. As an ETC, LTD Broadband will continue to provide access to
22 these critical services to customers throughout its service territory.

1 *iv. Toll Limitation Services*

2 LTD Broadband's current voice offerings do not distinguish between local exchange and
3 long distance calls. Consequently, these service plans do not apply any additional charge
4 for interexchange calls. The FCC has stated affirmatively that toll limitation service need
5 not be offered where a company's service plans do not include the potential for toll
6 charges. If, in future, LTD Broadband offers a service plan that does distinguish between
7 toll and non-toll calls – and which makes additional charges for toll calls possible – the
8 Company will offer toll limitation service to qualifying low-income consumers at no
9 additional charge.

10 **Q. PLEASE DESCRIBE THE SPECIFIC PLANS THAT LTD BROADBAND**
11 **INTENDS TO OFFER IN INDIANA.**

12 **A.** LTD Broadband currently offers service plans ranging from \$50-\$120/mo for broadband
13 speeds from 6/1 Mbps to 100/20 Mbps. LTD Broadband will offer a standalone VOIP
14 service in our RDOF census blocks for \$24.95/mo. Lifeline eligible consumers will be
15 able to apply their Lifeline discount to any residential plan that meets the FCC's then-
16 current minimum service standards. Attachment 3 to the Company's application includes
17 its Indiana service offering description and associated pricing.
18 For RDOF locations LTD intends to offer 100 Mbps service for \$100/mo and gigabit
19 service for \$150/mo.

20 **Q. WHAT METHODS WILL LTD BROADBAND USE TO PROVIDE SERVICE IN**
21 **INDIANA?**

22 **A.** LTD Broadband will provide service using fiber to the home (FTTH).

1 **Q. PLEASE DISCUSS HOW LTD BROADBAND WILL MEET THE “OWN**
2 **FACILITIES” REQUIREMENT FOR ETC OPERATIONS.**

3 **A.** LTD Broadband commits that, throughout its service area, it will comply with Section
4 214(e)(1) of the Act and offer supported services “either using its own facilities or a
5 combination of its own facilities and resale of another carrier’s services.” The Company
6 provides service using a combination of network facilities and technologies. Its last-mile
7 voice and broadband services are provided using fiber and fixed wireless microwave
8 platforms. For its transport backbone, the Company relies upon point-to-point licensed
9 wireless connections, owned fiber, leased dark fiber and Ethernet. In Indiana, LTD
10 Broadband will deploy similar network arrangements to provide supported voice services
11 and meet broadband requirements for RDOF support.

12 **Q. HOW WILL LTD BROADBAND ADVERTISE ITS SERVICES TO**
13 **CUSTOMERS?**

14 **A.** LTD Broadband will advertise the availability of the supported services throughout its
15 designated service areas using direct mail. LTD Broadband agrees to comply with all
16 form and content requirements for advertising that are adopted by the FCC or this
17 Commission and that are required of all similarly designated ETCs. As discussed in its
18 Application, LTD Broadband commits to direct advertising specifically towards Lifeline-
19 eligible customers in the awarded census locations. This Lifeline services advertising will
20 comply with the content requirements of FCC rule section 54.405(c), stating in “easily
21 understood language, that it is a Lifeline service, that Lifeline is a government assistance
22 program, the service is non-transferable, only eligible consumers may enroll in the
23 program, and the program is limited to one discount per household.” These content points

1 will be included in all Lifeline service- related materials issued by the Company,
2 including print, broadcast and web-posted marketing materials as well as the materials
3 used for customer enrollment and recertification. Attachment 4 to the Company's
4 Application includes a working sample draft of the Company's advertising.

5 **Q. DOES THE COMPANY MAINTAIN ANY ADMINISTRATIVE OR CUSTOMER**
6 **SERVICE OFFICES IN INDIANA?**

7 **A.** No.

8 **Q. HOW WILL CUSTOMERS COMMUNICATE WITH THE COMPANY WITH**
9 **QUESTIONS, CONCERNS OR COMPLAINTS?**

10 **A.** Customers can contact the Company via a toll-free number for any phone or by dialing
11 611 from their home phone. They will also be able to contact a customer service
12 representative by email or U.S. mail.

13 **Q. DOES LTD BROADBAND EMPLOY THIRD-PARTY AGENTS OR**
14 **INDEPENDENT CONTRACTORS TO CONDUCT ENROLLMENTS OR**
15 **OTHERWISE MARKET THE COMPANY'S SERVICES TO LOW-INCOME**
16 **CONSUMERS THAT QUALIFY FOR LIFELINE DISCOUNTS?**

17 **A.** No. All marketing to, and enrollment of, subscribers will be conducted by employees of
18 the Company. This enables LTD Broadband to maintain effective control over how these
19 processes are managed.

20 **Q. DOES LTD BROADBAND CONDUCT "MOBILE MARKETING" OUTREACH**
21 **TO LOW-INCOME CONSUMERS THAT QUALIFY FOR LIFELINE**
22 **DISCOUNTS VIA POP-UP LOCATIONS IN PUBLIC AREAS, TENT EVENTS**
23 **OR OTHER FORMS OF MARKETING/ENROLLMENT IN PUBLIC PLACES?**

1 **A.** No, it does not. As discussed, LTD Broadband advertises its services through social
2 media, word-of-mouth referrals and some strategic use of more traditional marketing
3 channels. The Company does not conduct on-the-road enrollment events. LTD
4 Broadband's advertising will be focused on all potential customers of its broadband
5 Internet and VoIP services and not in particular on Lifeline eligible consumers. LTD
6 Broadband will include information about available Lifeline discounts as required, but in
7 the context of retail services generally available to all consumers in the service area.

8 **Q. HOW WILL LTD BROADBAND SATISFY ALL CONSUMER PROTECTION**
9 **AND SERVICE QUALITY STANDARDS APPLICABLE TO ITS PROPOSED**
10 **ETC OPERATIONS?**

11 **A.** LTD Broadband considers service quality and compliance with consumer protection
12 standards to be integral to its operations. Consequently, throughout its more than eleven
13 year history of providing communications services, the Company has consistently
14 prioritized customer service and dedicated the necessary resources to ensure customer
15 satisfaction. The Company has not been the subject of any serious consumer complaints
16 or investigations. At this time, LTD Broadband complies with all state and federal
17 consumer protection requirements applicable to its operations. Upon designation as an
18 ETC in Indiana, LTD Broadband will comply with applicable consumer protection and
19 service quality standards, as set forth by the FCC, this Commission and the State of
20 Indiana. This will include compliance with all state and federal privacy standards,
21 including the FCC's Customer Proprietary Network Information (CPNI) rules and the
22 network performance disclosure requirements of 47 C.F.R. § 8.

1 **Q. WILL CUSTOMERS HAVE ACCESS TO INTRAC SERVICES FOR SPEECH**
2 **AND HEARING IMPAIRED INDIVIDUALS PURSUANT TO INDIANA CODE §**
3 **8-1-2.8 ET SEQ?**

4 **A. Yes.**

5 **Q. PLEASE DISCUSS HOW LTD BROADBAND WILL MAINTAIN**
6 **FUNCTIONALITY DURING EMERGENCY SITUATIONS.**

7 **A. The Company's network is designed to remain operational in emergency situations and to**
8 ensure uninterrupted service to customers. First, the network was developed, and
9 continues to be expanded, utilizing state-of-the-art industry standard equipment and
10 software. This ensures infrastructure durability to continue operations even under major
11 stress events. Moreover, recognizing that no network is absolutely protected against
12 adverse events, LTD Broadband has designed its network to provide for continued
13 services even if one or more elements within the network temporarily fail. Throughout the
14 layers of the Company's network, connections and transport resources are designed with
15 redundancy to provide immediately available back-ups in the event of power cuts or other
16 events. LTD Broadband employs a distributed data center model with duplication and
17 load sharing as well as uninterrupted power supply (UPS) and generator backups. All
18 point-of-presence (POP) locations will have failover power ability along with wireless re-
19 route backhaul ability and multiple routing options within each WAN/fiber POP tower
20 location. Within the data center are multiple network-to-network interfaces (NNIs) with
21 Tier 1 Internet Service Providers (ISPs) and public internet exchanges including MICE,
22 SiX, KCIX, QCIX, and DenverIX supporting full border gateway protocol (BGP) routing
23 to each transit carrier to ensure uninterrupted uptime for subscribers. In addition, the

1 Company's subscribers are provided with a UPS that is intended to provide backup power
2 for up to twenty four (24) hours in the event of outages.

3 **Q. HOW QUICKLY WILL THE COMPANY BEGIN OFFERING LIFELINE**
4 **SERVICES IN INDIANA?**

5 **A.** The precise date for commencement of service is uncertain, but we plan on commencing
6 construction within 3 months of the FCC issuing it's ready to fund notice for LTD
7 Broadband's award.

8 **Q. WILL THE COMPANY COMPLY WITH THE LIFELINE CERTIFICATION**
9 **AND VERIFICATION REQUIREMENTS?**

10 **A.** Yes, the Company will certify and verify consumer eligibility to participate in the Lifeline
11 program in accordance with FCC rules.

12 **Q. WILL THE COMPANY VERIFY A CUSTOMER'S CONTINUED ELIGIBILITY**
13 **FOR THE FEDERAL LIFELINE DISCOUNT?**

14 **A.** Yes. The Company will comply with applicable federal rules to require every consumer
15 enrolled in the Lifeline program to verify on an annual basis that he or she is the head of
16 his or her household, receives Lifeline-supported service only from the Company and, to
17 the best of his or her knowledge, no one else in the subscriber's household is receiving a
18 Lifeline-supported service. Customers will also be required to notify the Company in the
19 event that they no longer participate in the qualifying program. The company will verify
20 continued eligibility annually in accordance with state-specific procedures. The Company
21 will also monitor and take appropriate action when accounts are non-active.

22 **Q. WILL THE COMPANY PREVENT RECOVERY OF LIFELINE FUNDS FOR**
23 **CUSTOMERS WHO CEASE USING THE COMPANY'S LIFELINE SERVICE?**

1 **A.** Yes. The Company will implement a non-usage policy to de-enroll Lifeline customers that
2 have not used the Company's Lifeline service for 60 consecutive days.

3 **Q.** **DOES THE COMPANY INTEND TO REMIT ENHANCED 911 FEES IN**
4 **INDIANA?**

5 **A.** The Company will collect and remit any fees required by law.

6 **Q.** **DOES THE COMPANY CONTRIBUTE TO THE FUNDING FOR UNIVERSAL**
7 **SERVICE?**

8 **A.** The Company will contribute to federal and state universal service funds as required by
9 law.

10 **Q.** **DOES THE COMPANY'S DESIGNATION AS AN ETC IN INDIANA SERVE THE**
11 **PUBLIC INTEREST?**

12 **A.** Designation of LTD Broadband as an ETC in Indiana will serve the public interest by
13 facilitating the goal of deploying voice and high-speed broadband networks in unserved
14 and underserved rural, high-cost areas. The Company will deploy advanced
15 communications to unserved and underserved areas in Indiana in accordance with the
16 goals of the RDOF program. Expedited designation of LTD Broadband will serve the
17 public interest by ensuring that the Company is eligible to receive federal high cost USF
18 support and deploy critical communications facilities as soon as possible. The services to
19 be provided by the Company will provide important connectivity to consumers,
20 businesses, and community anchor institutions, including rural schools, libraries, and
21 medical facilities.

22 **Q.** **WHAT ARE THE UNIQUE ADVANTAGES OF THE COMPANY'S SERVICE**
23 **OFFERING?**

1 A. The Company's offerings are unique in that they will, in certain instances, be the first and
2 only opportunity for certain rural Indiana areas to receive high speed broadband services.

3 Q. **HOW WILL THE COMPANY USE THE FUNDS FROM THE FEDERAL**
4 **LIFELINE PROGRAM?**

5 A. The Company will use funds from the federal Lifeline program to provide supported
6 services to Lifeline customers.

7 Q. **IF THE COMPANY'S APPLICATION IS GRANTED, WILL THERE BE ANY**
8 **IMPACT ON THE UNIVERSAL SERVICE FUND?**

9 A. RDOF funding has been approved by the FCC and any impact on the Universal Service
10 Fund by virtue of the RDOF funding has already been deemed acceptable. Designation of
11 the Company as a Lifeline ETC will not unduly burden the USF or otherwise reduce the
12 amount of funding available to other ETCs.

13 Q. **WILL THE COMPANY COMPLY WITH ALL APPLICABLE COMMISSION**
14 **RULES AND REGULATIONS REGARDING ETCs?**

15 A. Yes. The Company affirms its commitment to comply with all rules and regulations that
16 the Commission may lawfully impose upon the Company's provision of service
17 contemplated by its application for ETC designation. We commit to comply with annual
18 reporting obligations the Commission has imposed on other similarly situated ETC
19 designees and to provide the Commission with a copy of our annual Lifeline Verification
20 survey results, which the Company files with USAC. The Company will also file with the
21 Commission on a quarterly basis a report detailing the number of Lifeline customers
22 enrolled each month, the number of deactivated Lifeline customers each month, and the
23 reasons for deactivation. If required by the Commission, the Company will also annually

1 report the number of complaints per 1,000 lines as well as the number of requests for service
2 from potential customers within the Company's designated area that were unfulfilled
3 during the prior year, including detail of the Company's attempt to provide service to each
4 potential customer.

5 **Q. IS THERE ANYTHING ELSE YOU WOULD LIKE TO PROVIDE IN YOUR**
6 **TESTIMONY?**


7 **A.** Yes. For all of the reasons I have discussed in this testimony, I reiterate LTD
8 Broadband's respectful request that the Commission (i) expeditiously review and approve
9 this Application by June 7, 2021; (ii) issue an Order designating the Company as an ETC
10 in Indiana for the specific purpose of receiving federal high-cost and low-income funding;
11 and (iii) grant such other relief as the Commission deems to be appropriate.

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

13 **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

4028196_1

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been served upon the following
counsel of record electronically this 18th day of March, 2021:

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