

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Application of LTD Broadband LLC for)
Designation as an Eligible)
Telecommunications Carrier for the Purpose) Docket No. DA-2021-0205
of Providing Services Supported by the)
FCC’s Rural Digital Opportunity Fund)
)

**AMENDED VERIFIED APPLICATION OF LTD BROADBAND LLC FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER AND
REQUEST FOR WAIVER OF 20 CSR 4240-4.017**

LTD Broadband LLC (LTD Broadband or the Company), by its counsel, respectfully submits this Application for Designation as an Eligible Telecommunications Carrier (ETC) pursuant to section 214(e)(2) of the Communications Act of 1934, as amended (the Act), and section 54.201 *et seq.* of the rules of the Federal Communications Commission (FCC) and Missouri rules 20 CSR 4240-31.015 and 21.016. LTD Broadband requests that the Missouri Public Service Commission (PSC) grant it designation as an ETC in the proposed service area for purposes of receiving support from the federal Universal Service Fund (USF), including support through the FCC’s high-cost USF program. Specifically, LTD Broadband seeks designation as an ETC on or before June 7, 2021 to receive funding awarded to the Company through the recently completed Rural Digital Opportunity Fund (RDOF) Auction so that it can deploy broadband and voice communications in certain unserved territories in Missouri.

LTD Broadband was a successful bidder in the recently completed RDOF Auction, where it will be awarded high-cost funding to extend broadband and digital voice services into four hundred seventy-one (471) census block groups (CBGs) in rural Missouri for 52,812 currently unserved locations. Because the RDOF support is essential to LTD Broadband’s ability to

extend service in rural Missouri, the Company respectfully requests that the PSC expeditiously review and approve this Application.

I. Introduction

A. The Company

1. LTD Broadband is a privately-held limited liability company formed in the State of Nevada in October 2010. The Company's principal place of business is 69 Teahouse St, Las Vegas NV 89138. Mr. Corey Hauer holds a 100% controlling interest in the Company. LTD Broadband has grown from a single water tower site in Rose Creek, Minnesota in 2011 to a network of over 2150 broadcast sites covering over 50,000 square miles servicing 16,000 customers. Currently LTD Broadband offers service in Iowa, Minnesota, South Dakota, and Wisconsin. LTD Broadband continues its rapid expansion of its footprint averaging 30 new broadcast sites each month. LTD Broadband is also overbuilding much of its existing fixed wireless footprint with 5G millimeter wave fixed wireless equipment to enable gigabit speeds. LTD Broadband operates an extensive fiber network with geographically dispersed redundant paths to insure maximum reliability and throughput its tower network. LTD Broadband believes it is one of the fastest growing and largest providers (by coverage area) of fixed-wireless broadband in the country. For the RDOF areas, LTD Broadband intends to deploy fiber to the home (FTTH) in the last mile using GPON and XGPON technology to offer speeds up to 10 Gbps. Middle mile connections may utilize multi-gigabit fixed-wireless transmission paths in certain instances.

2. LTD Broadband is registering to conduct business in Missouri, and the Company's certificate of existence from the Missouri Secretary of State will be submitted as soon as possible as Attachment 1. Additionally, LTD Broadband will file an application for certificate of

authority to serve as a telecommunications service provider in Missouri. The Company affirms that it will not partner with another entity in providing the services as an ETC.

B. Contacts

3. All correspondence, communications, pleadings, notices, orders, inquiries, and decisions relating to this Application should be addressed to:

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C. RDOF Auction

4. The FCC established the RDOF to continue its efforts to accelerate deployment of high-speed fixed broadband service capable of speeds of at least 25 Mbps download and 3 Mbps upload to unserved and underserved Americans in rural areas.¹ The Phase I auction awarded funds to serve areas that are wholly unserved by fixed broadband service at speeds of 25/3

¹ See *Rural Digital Opportunity Fund; Connect America Fund*, WC Docket Nos. 14-259 and 10-90, Report and Order, FCC 20-5, ¶ 4 (Feb. 7, 2020) (RDOF Order).

Mbps.² Phase II will award funds to serve areas that are only partially served and census blocks unawarded in the Phase I auction.³

5. On December 7, 2020, the FCC issued a Public Notice wherein LTD Broadband was awarded \$1,320,920,718.60 in funding over ten years to serve a total of 528,088 locations in fifteen states.⁴ In Missouri, the Company was awarded \$ \$15,879,368.83 over ten years to build out and operate a network for advanced communications serving 52,812 unserved locations in 471 census block groups.⁵ The FCC requires a company that is awarded support to obtain an ETC designation (encompassing receipt of high-cost support) for the areas covered by its successful bids within 180 days after being announced as a winning bidder (*i.e.*, by June 7, 2021).⁶

II. Federal Communications Act

6. A state commission may, upon its own motion, or upon request, designate a common carrier to be an ETC for purposes of receiving universal service support in accordance with section 214(e)(2) of the Act. Designated ETCs must comply with the requirements of section 214(e)(1), which states:

A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received –

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a

² *Id.*, ¶¶ 5, 9.

³ *Id.*

⁴ Rural Digital Opportunity Fund Phase I Auction (AUCTION 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021, FCC AU Docket No. 20-34, WC Docket No. 10-90 (December 7, 2020).

⁵ *See id.*

⁶ *See* RDOF Order at ¶ 81.

combination of its own facilities and resale of another carrier's services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefor using media of general distribution.

7. Section 214(e)(2) of the Act and section 54.201(c) of the FCC's rules state that the state commission may, in the case of an area served by a rural telephone company – and shall, in the case of all other areas – designate more than one common carrier as an ETC for a service area the state commission designates, provided that each additional requesting carrier satisfies section 214(e)(1) of the Act and section 54.201(d) of the FCC's rules. Before designating an additional ETC for an area served by a rural telephone company, section 214(e)(2) of the Act says that the state commission shall find that such designation is in the public interest.

III. Description of Service Area

8. LTD Broadband requests ETC designation for a service area that includes the census blocks in Missouri where it has been awarded RDOF support. A list of these census blocks is provided in Attachment 2. In the RDOF Order, the FCC granted forbearance “from the statutory requirement that the ETC service area of [an RDOF] participant conform to the service area of the rural telephone company serving the same area.”⁷

IV. LTD Broadband Satisfies the Requirements for ETC Designation

A. LTD Broadband is a Common Carrier

9. As noted above, LTD Broadband holds FCC wireless licenses, on a common carrier basis, for the provision of fixed wireless services. The Company will utilize these existing (and additional) wireless licenses, as well as owned and leased fiber and other network assets to provide services in Missouri. Moreover, LTD Broadband will provide supported services on a

⁷ RDOF Order, ¶ 93.

common carrier basis, as defined in the Act and permitted by the FCC. Consequently, LTD Broadband is a common carrier.

B. LTD Broadband Will Offer the Supported Services Throughout its ETC Designated Service Area

10. LTD Broadband commits to provide (i) voice grade access to the public switched telephone network (PSTN) or its functional equivalent; (ii) minutes of use for local service provided at no additional charge to end users; (iii) access to emergency services; and (iv) toll limitation services to qualifying low-income consumers as provided in accordance with 47 C.F.R. §§ 54.400 *et seq.* throughout the service area for which ETC designation is received.

Voice Grade Access to the Public Switched Telephone Network

11. LTD Broadband will provide voice-grade access to the PSTN by providing interconnected VoIP service throughout its designated service area. This plan complies fully with the FCC's universal service rules and orders. In the 2011 USF Transformation Order, the FCC established the Connect America Fund (CAF) and found that its authority to promote universal service did not depend on the classification of interconnected VoIP as a telecommunications service or an information service and that "ETCs may use any technology in the provision of voice telephony service." Currently, the Company provides an extensive range of service offerings for residential, business and government customers, including broadband Internet Access and VoIP, available at several price levels and upload/download speeds. At this time, LTD Broadband delivers retail plans with download speeds of up to 50 Mbps. Supported by RDOF funding, the Company expects to build networks that will enable it to develop service plans with download speeds up to 1 Gbps consistent with representations made to the FCC in its

RDOF short and long form project descriptions. LTD Broadband expects to offer a similar selection of plans (albeit incorporating improved upper-end download speeds) in Missouri.

i. Minutes of Use for Local Service

12. LTD's calling packages in Missouri will allow for unlimited local calling and unlimited domestic calling in the continental United States. Additional features include: caller ID; caller ID with name (if made available by caller); call forwarding; voicemail; enhanced 911; and local number portability. "Local usage" means an amount of minutes of use of exchange services, prescribed by the FCC, provided free of charge to end users." The FCC has not specified a minimum amount of local usage that a wireline ETC must offer. LTD Broadband will meet the local usage requirement by including unlimited local calling in its rate plans. The Company commits to comply with any minimum local usage requirements adopted in future by the FCC or by this Commission.

ii. Access to Emergency Services

13. LTD Broadband complies fully with the FCC's requirements for 911/E911 service provided in connection with VoIP services. In particular, the Company complies with the requirements of Section 9.5 of the FCC's rules. At the time of service installation, LTD Broadband confirms with each subscriber the correct physical address (or Registered Location) for the service. In addition, the Company notifies each subscriber about the need to promptly update his or her Registered Location in the event the subscriber changes locations, to ensure that future emergency calls are correctly routed. Subscribers are made aware that this update can be easily achieved via a telephone call to customer service or through the LTD Broadband customer portal. Finally, each subscriber is informed that certain circumstances may interfere with emergency calls made using the VoIP service, including, e.g., unreported changes to a subscriber's Registered Location, power outages and broadband network connectivity loss.

The Company currently provides its VoIP customers with access to 911/E911 emergency services through an arrangement with another provider. Emergency calls from LTD Broadband customers are connected to the other provider's network via high speed Session Interface Protocol (SIP) trunks at LTD Broadband's datacenters. The SIP trunks are configured for High Availability IP to ensure maximum call processing effectiveness. As an ETC, LTD Broadband will continue to provide access to these critical services to customers throughout its service territory.

iii. Toll Limitation for Qualifying Low-Income Consumers

14. At this time, LTD Broadband does not distinguish between local exchange and long distance calls in its voice offering. Consequently, those LTD Broadband plans that include voice services do not apply any additional charge for interexchange calls. If, in the future, LTD Broadband offers a service plan that does distinguish between toll and non-toll calls – and which makes additional charges for toll calls possible – the Company will offer toll limitation service to qualifying low-income consumers at no additional charge.

C. LTD Broadband Will Satisfy the “Own Facilities” Requirement for ETC Designation

15. LTD Broadband commits that, throughout its service area, it will comply with Section 214(e)(1) of the Act and offer supported services “either using its own facilities or a combination of its own facilities and resale of another carrier's services.” The Company provides service using a combination of network facilities and technologies. Its last-mile voice and broadband services are provided using fiber and fixed wireless microwave platforms. For its transport backbone, the Company relies upon point-to-point licensed wireless connections, owned fiber, leased dark fiber and ethernet. In Missouri, LTD Broadband will deploy similar network

arrangements to provide supported voice services and meet broadband requirements for RDOF support.

D. LTD Broadband Will Advertise the Availability of its Services

16. LTD Broadband will advertise the availability of the supported services throughout its designated service areas using direct mail. LTD Broadband agrees to comply with all form and content requirements for advertising that are adopted by the FCC or this Commission and that are required of all similarly designated ETCs. As discussed in its Application, LTD Broadband commits to direct advertising specifically towards Lifeline-eligible customers in the awarded census locations. This Lifeline services advertising will comply with the content requirements of FCC rule section 54.405(c), stating in “easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household.” These content points will be included in all Lifeline service-related materials issued by the Company, including print, broadcast and web-posted marketing materials as well as the materials used for customer enrollment and recertification. Provided as Attachment 3 is a draft sample draft of the Company’s advertising.

E. Consumer Protection and Service Quality Standards

17. LTD Broadband considers service quality and compliance with consumer protection standards to be integral to its operations. Consequently, throughout its more than eleven-year history of providing communications services, the Company has consistently prioritized customer service and dedicated the necessary resources to ensure customer satisfaction. The Company has not been the subject of any serious consumer complaints or investigations. At this time, LTD Broadband complies with all state and federal consumer protection requirements applicable to its operations. Upon designation as an ETC in Missouri, LTD Broadband will

comply with applicable consumer protection and service quality standards, as set forth by the FCC, this Commission and the State of Missouri. This will include compliance with all state and federal privacy standards, including the FCC's Customer Proprietary Network Information (CPNI) rules and the network performance disclosure requirements of 47 C.F.R. § 8.

F. Emergency Situation Functionality

18. The Company's network is designed to remain operational in emergency situations and to ensure uninterrupted service to customers. First, the network was developed, and continues to be expanded, utilizing state-of-the-art industry standard equipment and software. This ensures infrastructure durability to continue operations even under major stress events. Moreover, recognizing that no network is absolutely protected against adverse events, LTD Broadband has designed its network to provide for continued services even if one or more elements within the network temporarily fail. Throughout the layers of the Company's network, connections and transport resources are designed with redundancy to provide immediately available back-ups in the event of power cuts or other events. LTD Broadband employs a distributed data center model with duplication and load sharing as well as uninterrupted power supply (UPS) and generator backups. All point-of-presence (POP) locations will have failover power ability along with wireless re-route backhaul ability and multiple routing options within each WAN/fiber POP tower location. Within the data center are multiple network-to-network interfaces (NNIs) with Tier 1 Internet Service Providers (ISPs) and public internet exchanges including MICE, SiX, KCIX, QCIX, and DenverIX supporting full border gateway protocol (BGP) routing to each transit carrier to ensure uninterrupted uptime for subscribers. In addition, the Company's subscribers are provided with a UPS that is intended to provide backup power for up to twenty-four (24) hours in the event of outages.

G. LTD Broadband Will Comply With all Applicable Missouri and FCC Reporting, Remittance, and Other Regulatory Obligations

19. LTD Broadband will comply with all applicable Missouri and FCC requirements with respect to fees, charges, and reports. The Company will timely pay all applicable federal, state, and local regulatory fees, including universal service and E911 fees. Furthermore, LTD Broadband will comply with the ongoing reporting requirements for ETCs as set forth, and revised from time to time, by the PSC and the FCC. Additionally, LTD Broadband commits to respond to the PSC's requests for information, including requests regarding the Company's ability to assume responsibility to serve existing customers of another ETC that operates in the Company's designated service area that relinquishes all or part its ETC designation. LTD Broadband also will comply fully with measures adopted by the FCC and the PSC to prevent waste, fraud, and abuse within the USF. Moreover, the Company will notify the PSC in the future if any factors change that would affect its eligibility for an ETC designation. In the event that LTD Broadband determines to cease operations as an ETC, the Company will comply with the applicable relinquishment protocols of the FCC and the PSC.

V. Compliance with Commission Regulations

20. 20 CSR 4240-2.060(1)(B): A copy of documentation about the company's legal organization. The document is typically from the Missouri Secretary of State's Office depending on how the company is organized.

21. Response: Will be submitted to supplement this application.

22. 20 CSR 4240-2.060(1)(K): A statement indicating whether the applicant has any pending action or final unsatisfied judgments or decisions against it from any state or federal

agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of the application.

23. Response: The applicant has not had any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of the application.

24. 20 CSR 4240-2.060(1)(L): A statement that no annual report or assessment fees are overdue.

25. Response: No annual report or assessment fees are overdue.

26. 20 CSR 4240-31.016(2)(B)1: A statement identifying any individual or entity with ownership of 10% or more of the company. If none, provide a statement to that affect.

27. Response: The following individuals have ownership interests exceeding 10%:
Corey Hauer- 100%

28. 20 CSR 4240-31.016(2)(B)2: Identification of the company's key management.

29. Response: Key management consists of the following:

Corey Hauer- CEO

Corey is founder of LTD Broadband. He has over 25 years' experience in building companies and systems focused on broadband networks. LTD Broadband provides fixed-wireless

broadband service to thousands of residential, commercial and education sites across rural Iowa, Minnesota, Nebraska and South Dakota. Under Corey's leadership, LTD Broadband has grown to be the second largest provider (by footprint) of fixed-wireless broadband in the US in just 8 years. LTD Broadband has over 2000 towers covering over 50,000 square miles. Corey has provided IT consulting expertise to rural telecommunications firms, hospitality, wireless ISPs, a regional airline, law firms and manufacturers. He has deep knowledge of telecom and network architecture and has helped these firms deploy new technologies and network architectures. Prior to founding LTD Broadband Corey founded a wireline ISP/CLEC and had a successful exit for its LLC members.

Dallas Weitzel - Network Engineer

15 years' experience working for fixed-wireless ISPs in Minnesota and Nebraska. Deep knowledge in building scalable cookie-cutter network designs.

Rebecca Severtson - Office Manager

20 years' experience managing billing, collections, and customer care staff. Responsible for developing and documenting process and procedures.

Chad Peterson - Field Service Manager

5 years' experience doing installations and repairs. Was elevated to team lead 2 years ago and has been responsible for developing and training field service techs.

Justin Hansen - Tower Tech Manager

8 years' experience doing buildout, installations, and repairs. Was elevated to team lead 2 years ago and has been responsible for developing and training tower techs.

Haley Tollefson - Marketing Director

7 years' experience directing marketing. Skilled in measuring effectiveness of different marketing methods and tuning messaging to maximize ROI on marketing spend.

30. 20 CSR 4240-31.016(2)(B)3: If the applicant's ownership or management is shared with another company receiving universal service funding then identify the company and the arrangement. If none, provide a statement to that effect.

31. Response: Applicant's ownership or management is not shared with another company receiving universal service funding.

32. 20 CSR 4240-31.016(2)(B)4: A statement explaining any matter brought in the last 10 years by any state, federal or law enforcement agency involving fraud, deceit, perjury, stealing or omission or misstatement of fact against the applicant, any person or entity with 10% or more ownership interest in the applicant, or any affiliated company under common management or ownership. If none, provide a statement to that effect.

33. Response: There has been no matter brought in the last 10 years by any state, federal or law enforcement agency involving fraud, deceit, perjury, stealing or omission or misstatement of fact against LTD Broadband, any person or entity with 10% or more ownership interest in LTD Broadband, or any affiliated company under common management or ownership.

34. 20 CSR 4240-31.016(2)(B)5: A statement indicating the website containing information about the applicant's service and rates.

35. Response: Please see the following webpage for services and rates:

<https://ltdbroadband.com/plans>

36. 20 CSR 4240-31.016(2)(B)6A: A statement that the applicant will comply with the ETC requirements established by the MoPSC.

37. Response: Applicant will comply with the ETC requirements established by the Missouri PSC.

38. 20 CSR 4240-31.016(2)(B)6B: A statement Indicating whether the company intends to seek support from the Missouri USF or participate in the Disabled program.

39. Response: LTD Broadband does not intend to participate in the Missouri USF or Disabled programs at this time.

40. 20 CSR 4240-31.016(2)(B)6C: A commitment to notify the commission of any changes to company contact information.

41. Response: LTD Broadband shall notify the commission of any changes to company contact information.

42. 20 CSR 4240-31.016(2)(B)6D: A statement that the company is compliant with all reporting and assessment obligations with the MoPSC.

43. Response: Applicant has not yet been required to file any reports with the Commission and thus is currently compliant with all commission reporting and assessment obligations.

44. 20 CSR 4240-31.016(2)(B)6E: A statement that the applicant is compliant with contribution obligations to the Federal USF.

45. Response: LTD Broadband is compliant with contribution obligations to the federal USF.

46. 20 CSR 4240-31.016(2)(B)7: A statement Indicating if the Company has obtained any waivers of ETC-related requirements from the FCC. If any waivers have been granted, attach a copy of FCC documentation or provide a direct electronic link to this documentation.

47. Response: LTD Broadband has not sought nor received any waivers of ETC-related requirements from the FCC.

VI. Designation of LTD Broadband as an ETC is in the Public Interest

48. Designation of LTD Broadband as an ETC in Missouri will serve the public interest by facilitating the goal of deploying voice and high-speed broadband networks in unserved and underserved rural, high-cost areas. The Company will deploy advanced communications to unserved and underserved areas in Missouri in accordance with the goals of the RDOF program.

Expedited designation of LTD Broadband will serve the public interest by ensuring that the Company is eligible to receive federal high-cost USF support and deploy critical communications facilities as soon as possible. The services to be provided by the Company will provide important connectivity to rural Missouri consumers, businesses, and community anchor institutions, including rural schools, libraries, and medical facilities.

49. LTD Broadband seeks waiver of rule 20 CSR 4240-4.017 for good cause to avoid a delay of 60 days to make this filing and accelerate the introduction of its services in the expanded areas and declares that it has had no communication with the office of the Commission within the prior 150 days regarding any substantive issue likely to be germane to this proceeding.

VI. Conclusion

For the reasons set forth above, LTD Broadband respectfully requests that the PSC (i) waive 20 CSR 4240-4.017 and expeditiously review and approve this Application on or before June 7, 2021; (ii) issue an Order designating the Company as an ETC in Missouri for the specific purpose of receiving federal high cost and low-income funding; and (iii) grant such other relief as the PSC deems to be appropriate.

Respectfully submitted,

/s/ Carl J. Lumley

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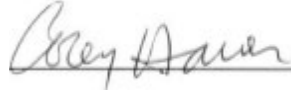
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Counsel for LTD Broadband LLC

April 28, 2021

VERIFICATION

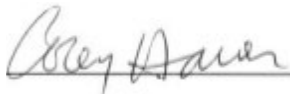
I hereby affirm that the foregoing representations are true and accurate to the best of my knowledge and belief.

A handwritten signature in cursive script, appearing to read "Corey Hauer", written over a horizontal line.

Corey Hauer, CEO
LTD Broadband LLC

Affidavit

By signing this form, I hereby certify that neither I, nor any other members of this filing party, has had communications with a Commissioner, Commissioner Advisor, Regulatory Law Judge, member of the General Counsel or any member of their support team in the sixty (60) days prior to the filing date of this application regarding any substantive issue included in this filing. If any communication of this sort has occurred in the previous sixty (60) day period, I further certify this application was held until sixty (60) days have passed from the date of the subject communication, or we have requested a waiver for good cause as allowed by Commission Rule 20 CSR 4240-4.017(1)(D).

A handwritten signature in cursive script, appearing to read "Corey Hauer", written over a horizontal line.

Corey Hauer
CEO, LTD Broadband LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail, or hand delivery, on this 28 day of April, 2021, to the following parties:

General Counsel
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Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of Public Counsel
PO Box 7800
Jefferson City, MO 65102
opcservice@opc.mo.gov

/s/ Carl J. Lumley

Attachment 1

Missouri Certificate of Good Standing

Attachment 2
Missouri Census Blocks

201030709001	201730080002	201759659003
201030709002	201730101061	201759659002
201030711022	201730009001	201759658002
201030711023	201730091004	201759658003
201039819002	201730100021	201759660001
202090438041	201730038002	201759657003
202090448041	201730100012	201759659001
202090440031	201730101072	201759658004
202090440041	201730064002	201759657002
202090448061	201730004002	200610006002
202090438022	201730055014	200610003002
202090438021	201730054004	200610006001
202090425021	201730072012	200610001003
202090448032	201730004001	200610007002
202090447023	201730095031	200610001001
202090424002	201730080001	200610003004
202090448042	201730092001	200610004001
202090400011	201730094013	200610002001
201730100042	201730081001	200150208002
201730091001	201730072042	200150203001
201730043002	201730071011	200150203002
201730057005	201730101111	200150209021
201730108011	201730101151	200150204002
201730004003	201730067001	200150202021
201730061001	201730101112	200150202022
201730091005	201730054002	200150209022
201730066001	201730102001	200150205002
201730098014	201730056003	201259511002
201730026002	201730072033	201259509001
201730078001	201730090003	201259513002
201730026001	201730076002	201259508004
201730024002	201730101114	201259512001
201730006002	201730051004	201259512002
201730095101	201730101091	201259508003
201730098013	201730073021	201259510001
201730059003	201730072041	200379573001
201730029003	201730030002	200379569002
201730043003	201730087001	200379570002
201730014004	201730031002	200379569003
201730089003	201759658001	200410844003
201730101101	201759660002	200410846001

200410846003	200790301001	201690007001
200410844002	200790304005	201690004002
201719571001	200790303003	201690008002
200910525021	200790303001	201690002002
200919800011	200790301002	200579621013
200910530061	200790304001	200579618003
200910529051	200790302001	200579620002
200910523061	200430203004	201974832003
200050817001	200099715003	200399512001
200050819001	200099713004	200739657003
200050817003	200099716005	200739657001
200050819004	200099716003	200999502002
201154896002	200530867004	200999501003
201154896003	201550011002	200999503002
201154898005	201550008004	201610002005
201154896004	201550008002	201610009005
200354937002	201550010001	201610007003
200354937001	201550002004	201610007004
200354941002	201550006002	201610010023
200354936002	201550004004	200959612001
200354935002	201690001003	200959612003
200354934001	201690003003	
200354940002	201690010003	

Attachment 3
Sample Advertisement



LIFELINE | MAKING PHONE & INTERNET MORE AFFORDABLE

LTD Broadband is a telecommunications provider who provides basic and enhanced services within its service territory, including services supported by Federal Universal Service funds and eligible for Federal Lifeline assistance.

We offer a discounted digital phone service to make calling more affordable to qualified consumers. Lifeline qualified consumers may be eligible to receive a discount on either digital phone or broadband internet service.

To qualify, a household must participate in one of the following:

- Supplemental Nutrition Assistance Program (SNAP, formerly known as Food Stamps)
- Medicaid
- Supplemental Security Income (SSI)
- Veterans and Survivors Pension Benefit
- Federal Public Housing
- Income at or below 135% of the federal poverty level

To learn more about the Lifeline program and discounts you may be eligible to receive visit the FCC's Lifeline Program page at:
<https://www.fcc.gov/consumers/guides/lifeline-support-affordable-communications>

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