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March 2, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

VIA ECFS

Attention: Wireless Competition Bureau

Re: Lake County Minnesota Petition for Waiver of ETC Designation Deadline for Rural
Broadband Experiments, WC Docket No. 10-90, WC Docket No. 14-259

Dear Ms. Dortch:

Lake County Minnesota (“Lake County”) respectfully submits the accompanying Affidavit of Thomas Burns in Support of Petition of Lake County Minnesota for Waiver of ETC Designation Deadline for Rural Broadband Experiments. This Affidavit is intended to supplement the Petition of Lake County Minnesota for Waiver of ETC Designation Deadline for Rural Broadband Experiments, which was filed on February 21, 2015.

Lake County filed its petition with the Minnesota Public Utilities Commission (“MPUC”), seeking designation as an Eligible Telecommunications Carrier (“ETC”) on January 29, 2015. On February 6, 2015, Citizens Telecommunications of Minnesota, LLC (“Citizens”), the incumbent local exchange carrier in the area serviced by Lake County, filed an objection to the form and completeness of Lake County’s ETC petition. On February 11, 2015, I filed, on behalf of Lake County, a response to Citizens’ objection. On that same date, mindful of the March 5, 2015, for reporting to the FCC that Lake County had received ETC status, I contacted the staff at the MPUC responsible for scheduling to attempt to determine when Lake County’s ETC petition would come before the MPUC for decision. I was told at that time that, because an objection to petition had been filed and the Department of Commerce had not yet filed comments regarding the petition, it was virtually certain that the Commission would not be able to address the matter before March 5 and that it was unlikely that the matter would be placed on the MPUC’s agenda before April. Subsequent to this conversation, the DOC twice requested, and was granted, an extension of time to file comments regarding Lake County’s ETC petition. The DOC’s comments are now due on March 15, 2015. It is reasonable to believe that, even had Lake County’s ETC petition been filed a month sooner, it would not have received a determination of its petition before the FCC’s March 5 deadline.

Accordingly, and for the reasons set forth in its Petition for Waiver, Lake County respectfully requests that the March 5, 2015, deadline for obtaining ETC status be waived.

Thank you for your consideration of this matter.

Sincerely,

Gregory Merz