

September 3, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. P999/PR-19-8

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

Annual Certifications Related to Eligible Telecommunications Carriers' (ETCs) Use of Federal Universal Service Support.

Sincerely,

/s/ JOY GULLIKSON
Telecommunications Analyst

/s/ DIANE DIETZ
Telecommunications Analyst

JG/DD/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. P999/PR-19-8

I. INTRODUCTION

Each year, the Minnesota Public Utilities Commission (Commission) must certify that Eligible Telecommunications Carriers (ETCs) receiving high cost funds are using the funds received in the previous year, and will use the funds in the coming year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.¹

In 2018, the Universal Service Administrative Company (USAC) distributed \$215,340,382 to Minnesota ETCs to mitigate high costs in the provision of voice and broadband services. Many companies, in accordance with the specifics of the plan that disburses funds, must meet location requirements.² Each year, through the required filing of FCC Form 481, companies receiving high cost funds³ report certain information, including an affidavit that the company meets certain FCC requirements. The Minnesota Commission requires each company seeking certification to include a separate affidavit from a company officer confirming that funds are used appropriately.

II. STATEMENT OF ISSUES

1. Whether companies listed in Attachment 1 complied with the Minnesota Commission order and provided certification from a company officer that the company has used that support only for the provision, maintenance and upgrading of facilities and services, for which the support is intended, consistent with section 254(e) of the Act and 47 C. F. R. § 54.313 and will appropriately use the support in the coming year.
2. Whether the Commission has sufficient documentation through the filed FCC form 481 to be assured that the funds received by each ETCs have been, and will be, used for their intended purpose.

¹ 47 CFR § 54.314 (a).

² Several of the funds pay out over a period of years, and require that the carrier provision service to a percentage of the eligible locations for each of the years that the fund pays out.

³ Companies certified as ETCs providing Lifeline only are required to file abbreviated versions of FCC Form 481, however, states do not annually recertify these Lifeline only providers.

III. RELEVANT HISTORICAL BACKGROUND

Section 254(e) of the Telecommunications Act of 1996 provides that a carrier that receives universal service support must use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. This requirement is also contained in 47 C.F.R § 54.314.

On November 18, 2011, the FCC released its Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Connect America, et al. in WC Dockets No. 10-90, 07-135, 03-109, and 10-208, GN Docket No. 09-51, CC Dockets 09-92 and 96-45, and WT Docket No 10-208 which comprehensively reformed universal service and intercarrier compensation mechanisms. (Connect America Fund – Intercarrier Compensation Order or CAF-ICC Order). Among other things, the CAF-ICC Order addressed annual Section 254(e) certification by states (with respect to the ETCs they have designated). The FCC extended its current reporting requirements (previously codified in 47 C.F.R. §54.209) to all ETCs, and codified the reporting requirements in new section 54.313 of its rules.

On April 11, 2014, in Docket No. P999/PR-14-08, the Commission issued an Order modifying the schedule for future annual certifications as follows:

July 1	Deadline for ETCs to file petitions and supporting documentation, including the information required by FCC Form 481.
September 1	Deadline for comments by the Department, OAG, and other interested persons.
September 8	Deadline for replies.

On July 7, 2017, for implementation in the July 1, 2018, 481 filings, the FCC released an Order simplifying future annual reporting requirements for ETCs receiving high-cost support. These changes eliminated the following information that was being collected: 1) network outage information; 2) unfulfilled service requests; 3) number of complaints per 1,000 subscribers for voice and broadband services; 4) voice and broadband service rates; and 5) the requirement for ETCs to certify compliance with service quality standards.⁴ The FCC also ordered that ETCs did not have to file directly with the state commissions, but the reports are available for states to download from the USAC website.

⁴ *Report and Order*. In the Matter of Connect America Fund ETC Annual Reports and Certifications. WC Docket No. 10-90, WC Docket No. 14-58. Released July 7, 2017.

On October 24, 2018, the Commission issued its Order in Docket P999/PR-18-8 requiring that, in future filings starting with this 19-8 docket, that an officer of each company subject to state certification file an affidavit with the Commission concurrently with the FCC Form 481 filing. The affidavit must include:

- a. The position of the affiant.
- b. That the affiant understands and is familiar with the requirements of the FCC concerning universal service funding.
- c. That the funds are and will be used appropriately.
- d. That the company is compliant with applicable rules on service quality and consumer protection.
- e. That there is sufficient backup power to ensure functionality without an external power source, and the company is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergencies.

On March 13, 2019, U.S. Senators Tina Smith and Amy Klobuchar sent a letter to FCC Chairman Pai, requesting that the FCC launch a probe into the business practices of Frontier Communications, and its subsidiaries, to determine whether the company is in compliance with the CAF funding requirements of the FCC. The request by Senator's Smith and Klobuchar was prompted by the January 4, 2019 Department report of investigation into the service quality, customer service, and billing practices in Docket P407, 405/CI-18-122.⁵

On April 26, 2019, Chairman Pai replied stating that he has conveyed the information regarding the State Commission's investigation to the FCC staff and has asked them to carefully monitor this development. Chairman Pai also stated, in part, that in 2015 Frontier was authorized to receive CAF Phase II model-based support for nearly 47,000 locations in Minnesota, that Frontier has reported to the FCC that it has met or exceeded each of its deployment milestones in CAF-eligible areas, and "Moreover, the Minnesota Public Utility Commission has annually certified to the Commission that Frontier used the high-cost funds appropriately."⁶

⁵ Letter to Chairman Pai, March 13, 2019. <https://www.smith.senate.gov/us-senators-tina-smith-amy-klobuchar-call-fcc-chair-launch-probe-frontier-communications-business>.

⁶ Response of Chairman Pai, April 26, 2019. <https://docs.fcc.gov/public/attachments/DOC-357331A1.pdf>

IV. DISCUSSION OF LAW AND POLICY

FEDERAL LAW

Section 254(e) of the Telecommunications Act states:

After the date on which Commission regulations implementing this section take effect, only an eligible telecommunications carrier designated under Section 214(e) shall be eligible to receive specific Federal universal support. A carrier that receives such support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Any such support should be explicit and sufficient to achieve the purposes of this section.

47 C.F.R. §54.313 outlines the annual reporting requirements for high-cost funding recipients. Each company or holding company shall certify:

- The carrier is able to function in emergency situations, per §54.202(a)(2).
- The carrier's voice service is no more than two standard deviations above the applicable national average urban rate for voice service (\$51.61).
- Pricing of broadband service that meets the FCC's public interest obligations is no more than the applicable benchmark, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states where the ETC receives support.
- Holding company and operating company identification.
- To the extent the recipient serves Tribal lands, documents or information demonstrating that the ETC had discussions with Tribal governments that, at a minimum, included:
 - A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
 - Feasibility and sustainability planning;
 - Marketing in a culturally sensitive manner;
 - Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
 - Compliance with Tribal business and licensing requirements.
- The results of network performance tests pursuant to the methodology and in the format determined by the Wireline Competition Bureau.⁷

⁷ The network performance test methodology is behind schedule, and the FCC delayed this requirement until 2020.

47 C.F.R §54.314, titled “Certification of Support for Eligible Telecommunications Carriers,” provides:

- (a) Certification. States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to this section.

V. SUMMARY OF HIGH COST SUPPORT FUNDS

The FCC, through the Universal Access Corporation (USAC)⁸, disburses money to companies through 20 different funds. In Minnesota in 2018, USAC disbursed \$215,340,382 from nine different funds. These funds were distributed through the following programs, ranked from most dollars distributed to least (plans with \$0 distributed in Minnesota are excluded from this list).

Plan		Amount Disbursed in MN in 2018
Connect America Cost Model	CACM	\$ 86,332,736
Alternative Connect America Model	ACAM	63,530,798
Connect America Fund Broadband Loop Support	BLS	26,145,636
Connect America Fund Intercarrier Compensation	ICC	19,818,264
High Cost Loop	HCL	17,509,486
Frozen High Cost Support	FHCS	1,353,132
Rural Broadband Experiment	RBE	581,587
Safety Net Additive Support	SNA	52,164
Interstate Common Line Support	ICLS	16,579

An explanation of these funds is included in Appendix A

⁸ USAC distributes and manages all the universal service funds mandated by the FCC.

VI. DISCUSSION OF ISSUES

Issue 1:

Whether companies listed in Attachment 1 complied with the Minnesota Commission order and provided certification from a company officer that the company has used that support only for the provision, maintenance and upgrading of facilities and services, for which the support is intended, consistent with section 254(e) of the Act and 47 C. F. R. § 54.313 and will appropriately use the support in the coming year.

All the companies, for the study area codes (SACs) listed in Part A of Attachment 1, filed 481 forms, and filed affidavits stating that support received last year and used in the preceding calendar year and funds in the coming calendar year, will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.⁹

The companies, for the study area codes listed in Part B of Attachment 1, were not certified in 2018 because they did not receive funds in 2017. All companies in this Part B have filed an affidavit confirming that the companies first received funds in 2019 and will conform to the requirements associated with receiving high cost funds in the coming year. These companies and study area codes are listed on the USAC web site for 54.314 Certifications.

The companies listed in Part C of Attachment 1 did not file complete forms 481, but they did file affidavits. However, these companies are asking the Commission to acknowledge that they have been granted ETC status. These companies were winning bidders in the CAF II reverse auction, but have either not received funds, or received them just recently in 2019, and do not otherwise receive high cost support.¹⁰¹¹

Issue 2:

Whether the Commission has sufficient documentation through the filed FCC form 481 to be assured that the funds received by each ETCs have been, and will be, used for their intended purpose.

Beginning with the July 1, 2018 Form 481 filings, the carriers were no longer required to report on many customer protection concerns. Carriers no longer provide: 1) network outage

⁹ Lake County recently petitioned the Commission to relinquish its ETC status, and did not file a form 481.

Although it is included in the USAC check list for certifying companies, the company did not request and is not eligible to be certified. It therefore does not appear on Attachment 1.

¹⁰ In 2018, the FCC awarded high cost funds to winners of a reverse auction for census blocks that had previously been offered to price cap companies. While many winners were incumbent telephone companies receiving other high cost support from other funds, a few companies were new to the process, and filed for ETC status in 2018, but received no funds for 2018.

¹¹ LTD Broadband and Broadband Corporation did not file 481 reports. There is no requirement that they do so.

information; 2) unfulfilled service requests; 3) number of complaints per 1,000 subscribers for voice and broadband services; 4) voice and broadband service rates; and 5) the requirement for ETCs to certify compliance with service quality standards. Reporting on these consumer protection issues have been replaced by certifications either by the company or the company's appointed agents that:

- The carrier is able to function in emergency situations, per §54.202(a)(2).
- The carrier's voice service is no more than two standard deviations above the applicable national average urban rate for voice service (\$51.61).
- Pricing of broadband service that meets the FCC's public interest obligations is no more than the applicable benchmark, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states where the ETC receives support.

The Department reviewed each company's 481 filing. No one issue appears to arise, at this point, to the level that the Department would recommend the Commission not certify the company, and thus deny Minnesotans the benefits that are to accrue from funds that aid investment in quality broadband and telecommunications services.

AREAS WHERE COMMISSION ACTION IS RECOMMENDED:

Issue 2a. The Carriers' Certifications With Respect To Tribal Engagement (54.313(A)(9))

Section 54.313(a)(9) requires ETCs, to the extent that they serve Tribal lands, to provide information with respect to their tribal engagement obligations. All petitioning ETCs serving Tribal lands have reported, using FCC Form 481, the extent to which they have engaged tribal governments in their plans to deploy broadband and voice service in tribal areas.

Qwest Corporation (dba CenturyLink) serves the following tribal entities in its service area: Lower Sioux Indian Community; Minnesota Chippewa Tribe: Boise Forte Band, Leech Lake Band, Mille Lacs Band, and White Earth Band; Prairie Island Indian Community (also served in part by Embarq Minnesota, Inc. dba CenturyLink); Red Lake Band of Chippewa Indians; and Shakopee Mdewakanton Sioux Community of Minnesota. Qwest sent each entity an outreach letter in 2018, offering to meet. Qwest's Form 481 indicates that the tribal entities did not respond to its offer to meet.

Citizens Telecommunications Company of MN, LLC and Frontier Communications of Minnesota, Inc. (collectively, Frontier) sent a letter on July 9, 2018, to the Mille Lacs Band of Ojibwe offering to meet, also without response.

Paul Bunyan Cooperative, appeared to have had some engagement with the Tribal governments in their service area in 2017, but received no response in 2018.

The Department's Tribal liaison has indicated that a lack of response by the Tribes does not fulfill the company obligation for engagement. The Department intends to work with each of the companies that serve Tribal lands to attempt to create a better method of Tribal engagement than currently exists. The Department recommends that the Commission formalize in its order that the companies serving Tribal lands need to fully cooperate with both the Department and the Tribes to comply with Section 54.313(a)(9), using FCC Form 481 to ensure Tribal engagement occurs in the future.

Issue 2b. Companies Serving Primarily in Another State

The following companies serve primarily in the state indicated:

	<u>Service Area Code</u>	<u>State</u>
CenturyTel NW WI	330950	WI
CenturyTel Chester	351126	IA
Polar Telecom	381614	ND
Polar Comm. Mut Aid	381630	ND
Red River Rural Tel	381631	ND
Hills Tel Co. SD	391405	SD
SplitRock Telecom	391657	SD

Because the companies file their 481 forms in the States indicated, the funding goes to the companies in those States. If the Minnesota Commission also certifies these companies, there would be a double certification. Attachment 2, primarily concerning CenturyTel NW WI, indicates that the USAC staff recommends that the Commission not certify CenturyTel NW WI. Department staff have confirmed all the above companies are being certified by the Commissions in the States in which they serve. As USAC has indicated there is no need for the Commission to certify the companies that primarily operate in other States, there appears to be no action needed by the Commission with respect to these companies. Attachment 1 does not include the companies listed above. If companies have any concerns with the Commission taking no action, comments should be filed by those companies to address this matter.

Issue 2c. Filing Form 481 with the Minnesota Commission in future years

Prior to the Form 481 filings due in July of 2018, all companies filed their 481 forms with the Commission, as well as with USAC. Last year the FCC ordered that companies were not required to file with the separate State Commissions. Instead, the forms are filed with USAC and available to approved individuals at the State through a secure web portal.

There are two concerns with not having the Form 481 filings efiled with the Commission for the certification process. First, the Commission is being asked to certify that the high cost funds that the ETC has received in the previous year, and in the coming year, will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”¹² In the absence of the Form 481 filings being efiled with the Commission, the Form 481 filings are not part of the record, as is necessary for the Commission to make its determination.

Second, the Form 481 filings from the previous year are no longer available via the USAC secure portal. Thus, the Form 481 filings submitted in July of 2018 are unavailable to review, and no analysis of what has changed for the ETC from the previous to the current year is possible. 2018 was the first year that the 481 forms were stored on the USAC website. USAC provided no indication that the forms would not be available once the next year’s forms were filed.

Other States (e.g. Mississippi and Ohio) have ordered companies to file their 481s with the Commission when they file with USAC. If filing the Form 481s in Minnesota is required, the ETCs will be responsible for redacting trade secret information by filing a public copy of any document determined to contain trade secret information.

ADDITIONAL AREAS WHERE THE DEPARTMENT INTENDS TO FOLLOW UP:

Issue 2d. Results Of Network Performance Testing [54.313(A)(11)]

Section 54.313(A)(11) states that carriers should provide “The results of network performance tests pursuant to the methodology and in the format determined by the Wireline Competition Bureau, Wireless Telecommunications Bureau, and Office of Engineering and Technology.” The format of these performance tests is still pending and the FCC is not requiring a report on these tests until next year. Many companies report that they test network speed upon installation, and again if a problem is reported. The Department will be closely monitoring this activity of the companies as soon as the standards are released from the FCC.

Issue 2e. Percentage of high cost funds used for capital expenditures.

Price cap companies (CenturyLink, Frontier, Windstream, Consolidated) are required to report the total amount of Phase II support, if any, the carrier used for capital expenditures in 2018. It is interesting to note that CenturyLink spent more in 2018 than it received for that year, while the other three price cap companies spent less than 40 percent of what they received on capital expenditures. While there is no action that the Commission can take to require price cap companies to expend more on capital, the Department will be monitoring these amounts over

¹² 47 CFR § 54.314 (a).

the years that the price cap companies receive high cost support in return for an obligation to serve a certain number of locations.

Issue 2f. Terms and conditions of voice telephony and the offering of standalone voice service and Lifeline terms and conditions.

The companies receiving CAF and ACAM money are required to offer standalone voice service. Most companies complied with this standard, although for several companies, the websites require the inputting of an address, so review was not possible. In addition, there are currently 9362 customers who currently receive Lifeline service. Department staff checked each filer's website to see if the website showed the Lifeline terms and conditions. Of the 109 481 filings, about 10 percent did not have the Lifeline terms and conditions on their website, or in a manner that was reasonably accessible. The Department is working with the companies to ensure the websites offer clear information about stand alone service, Lifeline and TAP, through its own investigation and through Docket No. P999/CI-18-112.

Issue 2 g. Are the locations listed as being served legitimate?

In October of 2018, USAC released its interactive online map displaying the locations deployed. Locations for the 2018 reporting period were not available until the spring of 2019. This map provides another tool to investigate whether high cost Universal Service funds are being used appropriately. The Department has recently been looking at the locations deployed and has some concerns that it intends to further investigate.¹³

While the current investigation is too preliminary to put the CAF money at risk for the 2018 reporting period, the Department intends to continue its investigation and bring its findings to the Commission if warranted.

Issue 2 h. Do the filed financial statements reflect appropriate use of high cost funds?

47 C.F.R. 54.314(f)(2) requires that privately held rate of return carriers submit a full and complete report of the company's financial condition and operations as of the previous year. Recipients of loans from the Rural Utilities Service (RUS) must submit copies of their RUS Operating Report for Telecommunications Borrowers (RUS Report) as filed with the RUS. Carriers that are not recipients of loans from the RUS, and whose financial statements are audited in the ordinary course of business, must submit a copy of their *audited* financial statements.

¹³ Broadband service is considered "deployed" if the "... carrier provides it to the location or could provide it within ten (10) business days upon request. FCC Public Notice: *Wireline Competition Bureau Provides Guidance to Carriers Receiving Connect America Fund Support Regarding Their Broadband Location Reporting Obligations*. WC Docket No. 10-90, DA 16-1363. Released December 8, 2016.

All carriers subject to this requirement filed copies of their audited or reviewed financial statements as required. Publicly traded companies are not required to file financial statements because their financial statements are available on the Securities Exchange Commission's website. The Department will consider whether it is appropriate to look at financial information as a means to ensure that funds are being appropriately used.

COMMISSION INVESTIGATION OF FRONTIER

On February 12, 2018, the Commission initiated an Inquiry into the Service Quality, Customer Service, and Billing Practices of Frontier Communications, Docket Number P407, 405/CI-18-122. That investigation is ongoing, and Minnesota consumers have alleged that Frontier insufficiently invests in, and maintains, its network in Minnesota. In the 2018 ETC certification proceeding, the Department recommended that Frontier be certified, along with the rest of the ETCs, as there was an inadequate record to determine whether Frontier has or has not used the federal funds it has received in a manner that complies with FCC requirements, and denying Frontier the federal funds it is scheduled to receive could have adverse consequences for Minnesota consumers.

In response to the Department's January 4, 2019 report on Frontier in Docket Number P407, 405/CI-18-122, Senators Smith and Klobuchar sought action from the FCC to address whether CAF funds are being used appropriately, as stated earlier in these comments. As the response by FCC Chairman Pai makes clear, the certification process by the Minnesota Commission is viewed as a safeguard to ensure Universal Service funds are used for their intended purpose. The response by Chairman Pai is helpful in clarifying the significance of the Minnesota Commission's role with ETC certifications.

Unfortunately, the Department is in a similar position to where it was a year ago on whether Frontier has used CAF funds appropriately. On August 2, 2019, Frontier and Commerce filed a settlement agreement for the Commission's consideration to resolve many of the issues raised in the 18-122 investigation. The use of CAF funds was explicitly excluded from that settlement and the Department has stated that the investigation on the appropriate use of CAF funds should continue. As there is an inadequate record at this time to determine whether Frontier has or has not used the federal funds it has received in a manner that complies with FCC requirements, and denying Frontier the federal funds it is scheduled to receive could have adverse consequences for Minnesota consumers, the Department recommends that Frontier be certified in the current process.

VII. COMMISSION OPTIONS

- A. Certify that all of the petitioning ETCs listed in Parts A and B of Attachment 1 have used Federal High Cost Universal Service Support received in 2018, and will use Federal High Cost Universal Service Support received in the coming year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Certify that the companies listed in Part C keep their ETC status through the 481 filings required in 2020.
- B. Require companies serving Tribal lands to fully cooperate with both the Department and the Tribes to comply with Section 54.313(a)(9), using FCC Form 481 to ensure Tribal engagement occurs in the future.
- C. Require Form 481 filings to be efiled with the Minnesota Public Utilities Commission beginning in 2020, in addition to the affidavit required by Commission Order in Docket 18-8.
- D. Find that some or all of the petitioning ETCs have failed to provide sufficient information to certify that the high cost support provided to the petitioning ETC(s) in 2018, will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Deny some or all of the ETCs' petitions for certification.

VIII. RECOMMENDATION

The Department recommends Alternative A, B, and C.

- A. Certify that all of the petitioning ETCs listed in Parts A and B of Attachment 1 have used Federal High Cost Universal Service Support received in 2018, and will use Federal High Cost Universal Service Support received in the coming year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Certify that the companies listed in Part C keep their ETC status through the 481 filings required in 2020.
- B. Require companies serving Tribal lands need to fully cooperate with both the Department and the Tribes to comply with Section 54.313(a)(9), using FCC Form 481 to ensure Tribal engagement occurs in the future.
- C. Require Form 481 filings to be efiled with the Minnesota Public Utilities Commission beginning in 2020, in addition to the affidavit required by Commission Order in Docket 18-8.

APPENDIX A

EXPLANATION OF HIGH COST FUNDS RECEIVED IN MINNESOTA 2018

Connect America Cost Model (CACM). The Connect America Cost Model, CACM/CAM adopted by the Wireline Competition Bureau on April 22, 2014, for determining the offer of support to **Price Cap**¹⁴ carriers. This is also known as CAF II. CACM is a model that estimates the cost to provide voice and broadband-capable network connections to all locations in the country. CACM provides specific details at the Census Block level, for the forward-looking cost to deploy and operate carrier grade VOIP service and a broadband-capable network and universal service support levels for that voice and broadband-capable network.¹⁵

The CACM fund is a six-year fund that began in 2015 with the award of \$1.5 billion to 10 telecommunications carriers.

In order to receive CAF II funding, carriers must offer at least one voice and one broadband service commercially. These services must meet the relevant service requirements and go to the required number of locations.

Carriers must complete:

- 40 % of deployments by the end of year 3
- 20 % more deployments by the end of year 4
- 20 % more deployments by the end of year 5
- 100 % of deployments by the end of year 6.

Alternative Connect America Model (ACAM). The Alternative Connect America Cost Model (ACAM) provides support to **Rate of Return** carriers that voluntarily elected to transition to a new cost model for calculating High Cost funding. ACAM models forward-looking economic costs of deploying and operating a fiber-to-the-premise (FTTP) network. Carriers must offer at least one voice and one broadband service commercially. These services must meet the relevant service requirements and go to the required number of locations.

Carriers must complete:

- 40% of deployments by the end of year 4
- 50% of deployments by the end of year 5

¹⁴ Minnesota has four price cap companies: CenturyLink, Consolidated, Windstream, and Frontier.

¹⁵ Connect America Cost Model, Document 3.1.4 Revised 6/21/2013.

- 60% of deployments by the end of year 6
- 70% of deployments by the end of year 7
- 80% of deployments by the end of year 8
- 90% of deployments by the end of year 9
- 100% of deployments by the end of year 10

Connect America Fund Broadband Loop Support (BLS) Connect America Fund Broadband Loop Support (CAF BLS) provides support for broadband-only lines, as well as voice lines and voice/broadband lines. It helps carriers recover the difference between loop costs associated with providing broadband-only service and consumer broadband-only loop revenues. CAF BLS was formerly Interstate Common Line Support or ICLS.

Connect America Fund Intercarrier Compensation (ICC). The Intercarrier Compensation (ICC) Recovery is the component of the Connect America Fund that introduces reforms to the intercarrier compensation system. ICC Recovery support went into effect in July 2012, and allows incumbent local exchange carriers (ILECs) to charge residential customers an Access Recovery Charge (ARC) on a limited basis. It also allows ILECS to recover charges from certain multiline business customers. If eligible, ILECs may receive additional recovery funds, provided they meet certain broadband service obligations.

High Cost Loop Support (HCL). High Cost Loop (HCL) support is available to rural price-cap and rate-of-return incumbent carriers and competitive carriers providing service in the areas of these rural companies, which must be designated as ETCs. HCL support provides support for the last mile of connection for rural companies in service areas where the cost to provide this service exceeds 115 percent of the national average cost per line. ROR carriers have updated limits on capital and operating costs for HCL support and updated corporate operating expense limits for HCL support as well as ICLS.

Frozen High Cost Support (FHCS) With the advent of the Connect American Fund, existing High Cost Program support was [frozen at December 2011 levels](#) and additional changes were made to existing programs to transition universal service from focusing on voice networks to supporting and expanding broadband availability

Rural Broadband Experiment (RBE). The Rural Broadband Experiments (RBE) provides funding for experiments in price-cap areas to bring robust, scalable broadband networks to residential and small business locations in rural communities.

Safety Net Additive Support (SNA). Safety Net Additive Support provides a boost to rate of return carriers whose Telephone Plant in Service on a per loop basis is at least 14 percent more than the study area's TPIS per loop investment, based on 2011 or prior year costs.

Interstate Common Line Support (ICLS). Interstate Common Line Support (ICLS) is available only to rate-of-return incumbent carriers (mostly rural and some non-rural carriers) and competitive carriers providing service in the areas of these companies, which must be designated as ETCs. ICLS helps to offset interstate access charges and is designed to permit each rate-of-return carrier to recover its common line revenue requirement, while ensuring that its subscriber line charges (SLCs) remain affordable to its customers. ICLS is based on annual projected data submitted by incumbent carriers each March 31 and is subject to an annual true-up process based on actual data submitted by incumbent carriers each December 31 for the previous calendar year. Because competitive carriers receive ICLS based on the incumbent carriers' data filings, which are used to calculate per-line rates, competitive carriers do not need to file projected or true-up data for ICLS.

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PART A

Company	SAC
CITIZENS-FRONTIER-MN	361123
WINNEBAGO COOP ASSN	361337
ACE TEL ASSN-MN	361346
ALBANY MUTUAL ASSN	361347
WILDERNESS VALLEY	361348
ARVIG TEL CO	361350
CITY OF BARNESVILLE	361353
BENTON COOP TEL CO	361356
BLUE EARTH VALLEY	361358
BRIDGEWATER TEL CO	361362
CALLAWAY TEL CO	361365
CLARA CITY TEL EXCH	361370
CLEMENTS TEL CO	361372
CONSOLIDATED TEL CO	361373
ARROWHEAD COMM CORP	361374
MID-COMM-HICKORYTECH	361375
DUNNELL TEL CO	361381
EAGLE VALLEY TEL CO	361383
EASTON TEL CO	361384
EAST OTTER TAIL TEL	361385
ECKLES TEL CO	361386
EMILY COOP TEL CO	361387
FARMERS MUTUAL TEL	361389
FEDERATED TEL COOP	361390
FELTON TEL CO. INC.	361391
GARDEN VALLEY TEL CO	361395
GARDONVILLE COOP TEL	361396
GRANADA TEL CO	361399
HALSTAD TEL CO	361401
FEDERATED UTILITIES	361403
HARMONY TEL. CO.	361404
HILLS TEL CO, INC	361405
HOME TEL CO - MN	361408
HUTCHINSON TEL CO	361409
JOHNSON TEL CO	361410
KASSON & MANTORVILLE	361412
MID STATE DBA KMP	361413
Windstream Communications, Inc.	361414
LISMORE COOP TEL CO	361419
LONSDALE TEL CO	361422
Runestone Telephone Association	361423
MABEL COOP TEL - MN	361424
CHRISTENSEN COMM CO	361425
MANCHESTER-HARTLAND	361426
MANKATO-HICKORYTECH	361427
MELROSE TEL CO	361430
MIDWEST TEL CO	361431
MID STATE TEL CO	361433
MINNESOTA VALLEY TEL	361439
CANNON VLY TELECOM	361440
NEW ULM TELECOM, INC	361442
LORETEL SYSTEMS, INC	361443
CENTURYTEL-MINNESOTA	361445
OSAKIS TEL CO	361448
PARK REGION MUTUAL	361450
PAUL BUNYAN RURAL	361451
PEOPLES TEL CO - MN	361453
PINE ISLAND TEL CO	361454
EMBARQ MINNESOTA	361456
REDWOOD COUNTY TEL	361472
ROTHSAY TEL CO, INC	361474
RUNESTONE TEL ASSN	361475
SACRED HEART TEL CO	361476
SCOTT RICE -INTEGRA	361479
Windstream Communications, Inc.	361482
SLEEPY EYE TEL CO	361483
SPRING GROVE COOP	361485
STARBUCK TEL CO	361487
TWIN VALLEY-ULEN TEL	361491
UPSALA COOP TEL ASSN	361494
VALLEY TEL CO - MN	361495
CROSSLAKE TEL CO	361499
NORTHERN TEL CO - MN	361500
WEST CENTRAL TEL	361501
WESTERN TEL CO	361502
WIKSTROM TEL CO, INC	361505
WINSTED TEL CO	361507
WINTHROP TEL CO	361508
WOODSTOCK TEL CO	361510
WOLVERTON TEL CO	361512
ZUMBROTA TEL CO	361515
INTERSTATE TELECOMM.	361654
QWEST CORP-MN	365142
Federated Telephone Cooperative	366130
Paul Bunyan Rural Telephone Cooperative	366132
Paul Bunyan Rural Telephone Cooperative	366133
CITIZENS-FRONTIER-MN	367123
T-Mobile Central LLC	369014
FRONTIER-MINNESOTA	361367

PART B

Company	SAC
CONSOLIDATED TEL CO	369044
CONSOLIDATED TEL CO	369914
FEDERATED TELEPHONE COOPERATIVE	369021
GARDEN VALLEY TELEPHONE CO	369039
HALSTAD TEL CO	369040
TEKSTAR COMMUNICATIONS, INC.	369007
WEST CENTRAL TELEPHONE ASSN	369042

PART C

Company	SAC
INTERSTATE TELECOM COOP, INC.	369041
ROSEAU ELECTRIC COOPERATIVE, INC.	369045
WIKSTROM TEL CO, INC.	369046
MID CONTINENT COMMUNICATIONS	369015

From: [Elizabeth Pertsevoi](#)
To: [Gullikson, Joy \(COMM\)](#)
Cc: [Peter.Jahn@wi.gov](#); [Doyle, Greg \(COMM\)](#); [McCarthy, Mike \(PUC\)](#); [Dietz, Diane \(COMM\)](#)
Subject: RE: Certification of companies that are substantially in another state
Date: Tuesday, August 13, 2019 8:29:40 AM
Attachments: [image001.png](#)

Wisconsin will certify this carrier. You can just ignore it; we're looking into why it is appearing in your list. Thanks.

Elizabeth Pertsevoi
(202)263-1643
epertsevoi@usac.org

From: Gullikson, Joy (COMM) [mailto:joy.gullikson@state.mn.us]
Sent: Thursday, August 08, 2019 10:52 AM
To: Elizabeth Pertsevoi <Elizabeth.Pertsevoi@usac.org>
Cc: Peter.Jahn@wi.gov; Doyle, Greg (COMM) <greg.doyle@state.mn.us>; McCarthy, Mike (PUC) <michael.mccarthy@state.mn.us>; Dietz, Diane (COMM) <diane.dietz@state.mn.us>
Subject: Certification of companies that are substantially in another state

Dear Elizabeth,

Can you please help us with a question regarding certification of border companies? In particular, I am looking at CenturyTel-NWWI, SAC 330950. This company is listed in the companies to be certified, yet, they do not show up in the USAC Disbursements report, except under WI. There are a few MN customers, but the majority are WI customers.

If WI certifies this company, through this SAC, why would MN also certify them? No high cost funds were distributed to this SAC, per the USAC Disbursement report.

We would be grateful for some insight into this situation. The same set of circumstances applies to other companies.

Thank you

Joy Gullikson

Joy Gullikson
Public Utilities Rates Analyst
651-539-1877
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101



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CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. P999/PR-19-8

Dated this **3rd** day of **September 2019**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	OFF_SL_19-8_PR-19-8
Scott	Anderson	scott_anderson@Midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_19-8_PR-19-8
Issa	Asad	reg@qlinkwireless.com	Q Link Wireless LLC	499 E Sheridan St Ste 400 Dania Beach, FL 33004	Electronic Service	No	OFF_SL_19-8_PR-19-8
Sam	Bailey	Sam.Bailey@iwirelesshome.com	i-Wireless	1 Levee Way Ste 3116 Newport, KY 41071	Electronic Service	No	OFF_SL_19-8_PR-19-8
Tracy	Bandemer	Tracy.Bandemer@itctel.com	Interstate Telecommunications Cooperative, Inc..	312 4th St W PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_19-8_PR-19-8
Dianne	Barthel	Dianne.barthel@centurylink.com	Centurylink Communications, LLC	200 South Fifth Street Room 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-8_PR-19-8
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kevin	Becker	kmbeck@wiktel.com	Wikstrom Telephone Company	21307 220th St Greenbush, MN 56726	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56221	Electronic Service	No	OFF_SL_19-8_PR-19-8
David	Bickett	dave.bickett@parkregion.com	Otter Tail Telcom	PO Box 277 100 Main St Underwood, MN 56586	Electronic Service	No	OFF_SL_19-8_PR-19-8
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_19-8_PR-19-8
Karl	Blake	kblake@polartel.com	Polar Communications Mutual Aid Corp.	PO Box 270 110 Fourth Street East Park River, ND 58270	Electronic Service	No	OFF_SL_19-8_PR-19-8
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_19-8_PR-19-8
Jack	Briggs	jbriggs@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Owatonna, MN 55060-2926	Electronic Service	No	OFF_SL_19-8_PR-19-8
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	201 Ross Avenue PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_19-8_PR-19-8
Chad	Bullock	chadb@wcta.net	West Central Telephone Association	308 Frontage Road PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_19-8_PR-19-8
Thomas	Burns	tgburns@otcpas.com	OLSEN THIELEN & CO. LTD	2675 Long Lake Rd Saint Paul, MN 55113	Electronic Service	No	OFF_SL_19-8_PR-19-8
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Campbell	tcampbell@otcpas.com	Olsen Thielen	2675 Long Lake Road St. Paul, MN 55309	Electronic Service	No	OFF_SL_19-8_PR-19-8
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.	P.O. Box 920 312 Fourth Street Clear Lake, SD 57226	Electronic Service	No	OFF_SL_19-8_PR-19-8
Andrew	Carlson	acarlson@briggs.com	Briggs And Morgan	2200 IDS Center80 South Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-8_PR-19-8
Jim	Carpenter	jim.carpenter@telrite.com	Telrite Corporation	1110 Alcovy Rd Covington, GA 30014	Electronic Service	No	OFF_SL_19-8_PR-19-8
Danyell	Carroll	danyell.carroll@windstream.com	Talk America, LLC	4001 N Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_19-8_PR-19-8
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-8_PR-19-8
Teresa	Crews	tcrews@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	Suite 100 1831 Anne Street Bemidji, MN 56601	Electronic Service	No	OFF_SL_19-8_PR-19-8
Donna	Eul	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212	Electronic Service	No	OFF_SL_19-8_PR-19-8
Donna	Eul	donnaeul@fedtel.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_19-8_PR-19-8
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd Columbus, OH 43231-5931	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	OFF_SL_19-8_PR-19-8
Shari	Flanders	sflanders@polartel.com	Polar Communications	PO Box 270 Park River, ND 58270	Electronic Service	No	OFF_SL_19-8_PR-19-8
Travis	Floyd	travisf@wcta.net	West Central Telephone Assoc	308 Frontage Rd PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_19-8_PR-19-8
Mark	Forseth	markforseth@rrv.net	Halstad Telephone Company	Box 55 345 2nd Ave West Halstad, MN 56548	Electronic Service	No	OFF_SL_19-8_PR-19-8
Julie	Geerdes	jgeerdes@paulbunyan.net	Paul Bunyan Rural Telephone Coop	1831 Anne St. NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_19-8_PR-19-8
Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Assoc	PO Box 304 308 Frontage Rd Sebeka, MN 56477	Electronic Service	No	OFF_SL_19-8_PR-19-8
Roxi	Hacker	roxih@interstatetelcom.com	Interstate Telcom Consulting	130 Birch Avenue West Hector, Minnesota 55342	Electronic Service	No	OFF_SL_19-8_PR-19-8
Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1104 19th Ave SW Ste B Willmar, MN 56201	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Corey	Hauer	coreyhauer@gmail.com	LTD Broadband LLC	69 Teahouse St Las Vegas, NV 89138	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kim	Haugen	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd AvePO Box 127 Lismore, MN 56155	Electronic Service	No	OFF_SL_19-8_PR-19-8
Donna	Heaston	Donna.Heaston@Allstream.com	Electric Lightwave, LLC (New)	6160 Golden Hills Dr Golden Valley, MN 55416	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kent	Hedstrom	kent@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	OFF_SL_19-8_PR-19-8
Bruce	Hegge	manager@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	OFF_SL_19-8_PR-19-8
Pauleen	Hinkley	phinkley@rrv.net	Halstad Telephone Company	345 2nd Ave W PO Box 55 Halstad, MN 56548	Electronic Service	No	OFF_SL_19-8_PR-19-8
Cory	Hoerler	choerler@mhtele.com	Manchester Heartland	204 Railroad St Manchester, MN 56007-5012	Electronic Service	No	OFF_SL_19-8_PR-19-8
Dwayne	Johnson	jtcbusiness@jtc-co.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_19-8_PR-19-8
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_19-8_PR-19-8
Conrad	Johnson	jtconrad@jtc-co.net	Johnson Telephone Company	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-8_PR-19-8
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	OFF_SL_19-8_PR-19-8
Carrie	Kern Taggart	cak@wiktel.com	Wikstrom Telephone Company Inc	212 South Main PO Box 217 Karlstad, MN 56732	Electronic Service	No	OFF_SL_19-8_PR-19-8
Mark	Klinkhammer	klinkham@gvtel.com	Garden Valley Telephone Company	201 Ross Avenue PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	OFF_SL_19-8_PR-19-8
Pat	Knutson	pat.knutson@aciracoop.net	Farmers Mutual Telephone Company	PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_19-8_PR-19-8
Patricia	Knutson	patk@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_19-8_PR-19-8
Julie	Kolka	juliekolka@mabeltel.coop	Mabel Cooperative Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	OFF_SL_19-8_PR-19-8
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	OFF_SL_19-8_PR-19-8
Tom	Lorenz	tommytt@fedtel.net	Federated Telephone Cooperative	405 2nd St. E. PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Electronic Service	No	OFF_SL_19-8_PR-19-8
Al	Lundeen	alundeen@wiktel.com	Wikstrom Telephone Company	212 S Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_19-8_PR-19-8
Danna	MacKenzie	danna.mackenzie@state.mn.us	MN Office of Broadband Development	332 Minnesota Street, #E200 1st National Bank Building St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-8_PR-19-8
Patrick J	Mastel	pat_mastel@mimi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_19-8_PR-19-8
Cassandra	Milligan	cassandra.milligan@tagmobile.com	TAG Mobile, LLC	701 E Plano Pkwy Ste 408 Plano, TX 75074	Electronic Service	No	OFF_SL_19-8_PR-19-8
Todd	Morris	todd.morris@itctel.com	Interstate Telecommunications Coop	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_19-8_PR-19-8
Ann	Morrison	amorrison@fairpoint.com	Consolidated Communications Enterprise Services, Inc./Fairpoint	221 E Hickory St Mankato, MN 56001-3610	Electronic Service	No	OFF_SL_19-8_PR-19-8
Monty	Morrow	montymorrow@nuvera.net	Nuvera	235 Franklin St Hutchinson, MN 55350	Electronic Service	No	OFF_SL_19-8_PR-19-8
Melanie	Nelson	mdnelson@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	OFF_SL_19-8_PR-19-8
Josh	Netland	jnetland@emily.net	Emily Cooperative Telephone Company	PO Box 100 40040 State Hwy 6 Emily, MN 564470100	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Chris	Olson	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	OFF_SL_19-8_PR-19-8
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	OFF_SL_19-8_PR-19-8
Paul	Paco Erickson	paco_erickson@mml.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_19-8_PR-19-8
Michelle	Painter	michelle.painter@sprint.com	Virgin Mobile USA, L.P.	12502 Sunrise Valley Dr Reston, VA 20196	Electronic Service	No	OFF_SL_19-8_PR-19-8
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_19-8_PR-19-8
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kristi	Putnam	kristi.putnam@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kris	Rademacher	krisr@farmerstel.net	Farmers Mutual Telephone Co.	301 2nd St S Bellingham, MN 562120369	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kris	Radermacher	kris.radermacher@aciracoop.net	Federated Telephone Cooperative	405 2nd St E PO Box 156 Chokio, MN 56212	Electronic Service	No	OFF_SL_19-8_PR-19-8
Brian	Rathman	brian.rathman@telrite.com	Telrite Corporation	2300 Windy Ridge Pkwy Ste 350S Atlanta, GA 30339	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
M.	Ray	cecilia.ray@lawmoss.com	Moss & Barnett	Suite 1200 150 S. 5th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-8_PR-19-8
Julia	Redman Carter	jrcarter@readywireless.com	Boomerang Wireless LLC	955 Kacena Rd Ste A Hiawatha, IA 52233	Electronic Service	No	OFF_SL_19-8_PR-19-8
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-8_PR-19-8
Mark	Roach	mark.roach@ctctelcom.net	Consolidated Telephone Company	1102 Madison Street PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_19-8_PR-19-8
Bryan	Roth	Bryan.roth@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_19-8_PR-19-8
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_19-8_PR-19-8
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_19-8_PR-19-8
Julie	Serbus	jserbus@mnval.net	Minnesota Valley Telephone Company	PO Box 310 340 2nd Ave E Franklin, MN 55333	Electronic Service	No	OFF_SL_19-8_PR-19-8
Ryan	Severson	rseverson@roseauelectric.com	Roseau Electric Coop., Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_19-8_PR-19-8
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 Lonsdale, MN 55046-0358	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Springer	greg@gocctc.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kimberly	Starr	kim@kclenterprises.net	Dunnell Telephone Company	PO Box 728 Judson, Texas 75660	Electronic Service	No	OFF_SL_19-8_PR-19-8
Tracey	Stoll	tstoll@roseauelectric.com	Roseau Electric Cooperative, Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_19-8_PR-19-8
Cynthia	Sweet	csweet@acentek.net	Ace Telephone Association	PO Box 360 207 East Cedar Houston, MN 559430360	Electronic Service	No	OFF_SL_19-8_PR-19-8
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	OFF_SL_19-8_PR-19-8
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_19-8_PR-19-8
Mark	Thompson	MarkT@gvtel.com	Garden Valley Telephone Company - Coop	201 Ross Ave PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_19-8_PR-19-8
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	OFF_SL_19-8_PR-19-8
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-8_PR-19-8
Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277 Upsala, MN 56384	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kalsie	Vanasse	kalsiev@paulbunyan.net	Paul Bunyan Rural Telephone Coop	1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_19-8_PR-19-8
Amy	Vick	amyb@itctel.com	Interstate Telecommunications Coop.,	312 4th St. W. PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_19-8_PR-19-8
Nancy A.	Vogel	nancy_vogel@mml.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_19-8_PR-19-8
Lyle	Waughtal	lyle.waughtal@gvtel.net	Garden Valley Telephone Company - Coop	201 Ross Ave PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_19-8_PR-19-8
Mark	Wegscheid	markw@broadband-mn.com	Broadband Corp.	1772 Steiger Lake Ln Victoria, MN 55386	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kathy	Weitala	kathy.weitala@itctel.com	Interstate Telecommunications Cooperative, Inc..	312 4th Street West Clear Lake, South Dakota 57226	Electronic Service	No	OFF_SL_19-8_PR-19-8
Diane	Wells	diane.wells@state.mn.us	Department of Commerce	Suite 500 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_19-8_PR-19-8
Kristi	Westbrock	Kristi@goctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401-0972	Electronic Service	No	OFF_SL_19-8_PR-19-8
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_19-8_PR-19-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mike	Wilker	Mwilker@jagcom.net	Jaguar Communicatoins, Inc.	213 S Oak Ave Owatonna, MN 55060	Electronic Service	No	OFF_SL_19-8_PR-19-8
Anthony	Will	anthonyw@broadband-mn.com	Broadband Corp	585 Hwy 7 W Hutchinson, MN 55350	Electronic Service	No	OFF_SL_19-8_PR-19-8
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-8_PR-19-8
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_19-8_PR-19-8
Shane	Young	office@northern.tel	Northern Telephone Company	13448 County Road 25 Wawina, MN 55736	Electronic Service	No	OFF_SL_19-8_PR-19-8
william	haas	william.haas@t-mobile.com	T-Mobile Central LLC	2001 Butterfield Rd Suite 1900 Downers Grove, IL 60515	Electronic Service	No	OFF_SL_19-8_PR-19-8