

Staff Briefing Papers

Meeting Date September 27, 2018 Agenda Item 2*

Company Local Exchange Companies, Eligible
Telecommunications Carriers

Docket No. **P999/PR-18-8**

In the Matter of Annual Certification related to Eligible Telecommunications Carrier's (ETCs) Use of the Federal Universal Service Support required pursuant to C.F.R. 54.313

- Issues
1. Should the Commission approve all petitioning ETCs' requests for high cost support certification?
 2. Should the Commission order other action in this matter?

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Relevant Documents

Date

Filings for High-Cost Certifications	July 16, 2018
Comments by the Department of Commerce	September 10, 2018
Reply Comments of T-Mobile	September 17, 2018
Reply Comments of Virgin Mobile	September 17, 2018
Responsive Comments of the Department of Commerce	September 20, 2018

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

I. Statement of the Issues

1. Should the Commission approve all petitioning ETCs' requests for high cost support certification?
2. Should the Commission order other action in this matter?

II. Department of Commerce Comments

The Minnesota Department of Commerce (Department) filed initial Comments in this proceeding on September 10, 2018. Since 2001 States have filed annual certification of FCC Fm. 481 compliance filings by Eligible Telecommunication Carriers (ETCs) regarding high-cost program support from the Universal Service Fund (USF). The Department provides on pages 1-4 a short historical and procedural history of the oversight of ETC receipt and use of high cost funding from the Federal USF.

Noteworthy this year is the July 7, 2017, FCC Order eliminating the following information from collection: 1) network outage information; 2) unfulfilled service requests; 3) number of complaints per 1,000 subscribers; 4) voice and broadband service rates; and 5) the requirement for ETCs to certify compliance with service quality standards.

Pages 4-8 provide an overview of the law governing the annual reporting process and the Department's analysis of its application in the review process. Appendix A provides the full text of 47 C.F.R. 54.313 Annual reporting requirements for high-cost recipients. Appendix B shows Carriers High Cost Support provided in total and per line per month (including Lifeline-only wireless carriers not certified by the Commission).

The Department characterizes the principle issue pending in this proceeding as being:

- "Whether companies receiving universal service fund support provide officer-certification 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) and will appropriately use the support in the coming year. [and]
- Whether the Commission has sufficient documentation to be assured that the funds received by telecommunications companies are used for their intended purpose."

The Department notes that its analysis has not incorporated the September, 2018 ruling by the United States Court of Appeals for the Eight Circuit that Voice over Internet Protocol (VoIP) is an "information service". The Department also notes that tribal engagement are often just minimally compliant (see p. 5). With regards to the filing of financial reports, the Department describes compliance with the requirements of 47 C.F.R. 54.314(f)(2) at page 6.

With regards to additional past Minnesota filing requirements the Department notes attempts in the past two years to gather additional information from certain high cost providers or from those having corporate overhead of over 50 percent of total costs, but find those attempts ineffective in providing additional oversight. In contrast, the Department notes the usefulness of the filing format having a uniform affidavit and attached data summary such as provided by several companies this year (see p. 7 and Attachment 1). It recommended that Minnesota adopt such a uniform affidavit and data summary for every ETC filing a FCC Fm. 491 building on earlier affidavit requirements (Docket No. P999/M-02-1403).

Finally, the Department notes at p. 8 that Frontier Communications has an open investigation in which Minnesota consumers have alleged that Frontier insufficiently invests in, and maintains its network in Minnesota (Docket No. P407, P405/CI-18-122). While acknowledging a possible relationship to issues in this proceeding, the Department notes those issues can be pursued in the Commission's open investigation, and that doing so in this proceeding could have adverse funding consequences for Minnesota consumers.

III. T-Mobile Reply Comments

T-Mobile Reply Comments address the Department's proposed uniform expanded affidavit and financial summary. T-Mobile asserts the Department's proposal needs more explanation and that it should not apply to wireless companies. It is not strongly opposed to the proposed affidavit. It strongly opposes the financial summary reporting being applied to wireless ETCs.

T-Mobile is a facilities-based provider of commercial mobile radio service ("CMRS") providing service in Minnesota. On September 27, 2011, the Commission designated T-Mobile as an ETC for service in Minnesota. In Minnesota, T-Mobile receives both high-cost USF and Lifeline USF. It is a "legacy" ETC, *i.e.*, one that does not receive USF for the provision of broadband services. The company reports filing its Form 481 on July 11, 2018 and that it included all information required by FCC rules.

In background, the company notes several changes made to FCC Fm. 481 filing requirements, including the removal of the need to certify compliance with service quality and consumer protection rules. (See p. 2)

T-Mobile does not object to filing its FCC Fm. 481 with the State of Minnesota although the FCC no longer requires it to do so and state law does not require it. (See p. 5) The company suggests the Commission clarify if it wants ETCs to continue doing so, and if so, to clarify if wireless providers are included.

With regards to the Department's proposed uniform expanded affidavit and financial summary, T-Mobile observes at page 4:

- They mirror information provided by certain state-regulated landline ETCs and
- "Apparently the Department anticipates that the proposed Financial Summaries would be useful in helping it analyze whether such landline ETCs are making appropriate use of high-cost USF receipts."

The company observes that the first 3 parts of the proposed affidavit are redundant to that now in place. It notes again that 4th item, the quality affirmation was removed by the FCC and wants an explanation from the Department why it should be renewed in a state filing. The 5th item on emergency readiness is duplicative of information in the Form 481, and again, the company wants the Department to explain its inclusion in the affidavit. Nonetheless, in the end,

"T-Mobile does not strongly object to the application of the proposed Affidavit requirements to wireless legacy ETCs receiving high-cost support, provided the requirements are not duplicative of information included in other documents filed with the Commission." (See p. 6-7)

T-Mobile opposes the Department's proposed financial summary asserting that it exceeds the state and federal government authorities to regulate wireless ETCs. The company notes the Department's Comments appear to be addressing landline carriers but that the scope of its proposal is not clear as set forth in its September 10, 2018 proposal. (See p. 7)

T-Mobile asserts that wireless carriers do not use, nor are they required to use, a system of accounts that categorizes expenses in the manner contemplated in the Department's proposed financial summary. The company's accounting is nationwide and not state specific. Undertaking specialized accounting to produce a Minnesota specific financial summary would be "very expensive and onerous." (See p. 7)

To provide the proposed financial summary would require T-Mobile to provide detailed financial and operational information that the Commission which would likely run afoul of the longstanding prohibition on state commission regulation of wireless carriers' rates. See 47 U.S.C. § 332(c)(3)(A); *Cellco P'ship v. Hatch*, 431 F.3d 1077 (8th Cir. 2005) (describing Section 332 preemption). (See p.8)

The Commission should not impose such a significant reporting requirement on such short notice, with such little explanation, and without providing affected companies a more robust opportunity to analyze the requirements and the cost of compliance.

For all these reasons, T-Mobile strongly opposes the application of the proposed Financial Summary reporting requirements to wireless legacy ETCs.

IV. Virgin Mobile Reply Comments

Virgin Mobile, a wholly-owned indirect subsidiary of Sprint Corporation, is a facilities based provider of commercial mobile radio service ("CMRS") throughout the United States. Virgin Mobile provides Lifeline service in Minnesota under the trade name "Assurance Wireless." On December 7, 2012, the Commission designated Virgin Mobile as an ETC for the limited purpose of qualifying for federal Universal Service Fund subsidies for serving customers enrolled in the federal Lifeline program.

Virgin Mobile opposes the application of the Department's proposed affidavit and financial summary being applied to wireless Lifeline-only ETC's. It notes that the core purpose of this docket is related to landline ETCs use of the high-cost Universal Service Fund and the State certifying it to the USAC and FCC. The company observes that the Department's proposal appears to address landline companies but needs to clarify its proposal to exclude wireless Lifeline-only ETCs.

Virgin Mobile notes at page 2 that unlike those companies filing FCC Fm. 481 reports that the Commission certifies to the USAC and FCC,

An ETC that receives only low-income USF (*i.e.*, a "Lifeline-only" ETC) must also annually report certain compliance information on the Form 481. 47 C.F.R. § 54.422. However, for a Lifeline-only ETC, there is no comparable requirement that the state certify the ETC's use of support to USAC or the FCC. This is because unlike high-cost support, the purpose of Lifeline support is to reimburse ETCs for discounted service provided to qualifying low-income consumers. See 47 C.F.R. § 54.407.

The company notes at p. 2 that the information required to be included in an ETC's Form 481 varies widely depending on the ETC and the type of USF the ETC is eligible to receive. In the case of the filing of a state-designated Lifeline-only ETC, Virgin Mobile need only include holding company and branding

information (47 C.F.R. § 54.422(a)(1)) and the terms and conditions of the voice telephony service plans offered to its Lifeline subscribers (47 C.F.R. § 54.422(a)(2)). Virgin Mobile's 2018 Form 481, filed with the Commission in this docket on July 9, 2018, contains the information required by 47 C.F.R. § 54.422. Virgin Mobile notes at page 4 that:

Lifeline-only ETCs do not receive USF for the purpose of investing in or maintaining telecommunications infrastructure. Rather, Lifeline USF is used only to reimburse the ETC for its provision of discounted Lifeline service. See 47 C.F.R. § 54.407. But the Department's recommendations, especially the Financial Summary, have nothing to do with such reimbursement—rather, they relate solely to the use of funds to invest in or maintain telecommunications infrastructure. And, the items required in the Financial Summary are structured to relate to the System of Accounts used in regulation of wireline carriers; they have no correlation to wireless carriers' non-regulated accounting systems.

Virgin Mobile asserts at page 5 that the proposed affidavit and financial summary exceed state and FCC regulation of wireless ETCs:

... [T]he second and third items in the Affidavit relate to determining whether the ETC is using the support for the purposes for which it is intended. But state commission oversight of that issue only extends to high-cost ETCs. See 47 C.F.R. § 54.314(a) (requirement that states certify that ETCs are only using USF for purposes for which it is intended extends only to high-cost ETCs).

The fourth item in the Affidavit corresponds to an FCC compliance requirement that that the FCC decided last year was no longer necessary. See *2017 ETC Order* at ¶¶ 13-14 (describing how certification as to compliance with service quality standards and consumer protection rules is unnecessary, because the FCC and USAC have the authority to investigate violations of those standards and rules regardless of carriers' certifications).

The fifth item in the Affidavit corresponds to an FCC requirement that exists for high-cost ETCs but is not applicable to state-designated Lifeline-only ETCs. See 47 C.F.R. §§ 54.313(a)(1).

Similarly, the Financial Summary would require wireless Lifeline-only ETCs to provide detailed information about their finances and operations to the Commission. But the Commission's jurisdiction over the rates and finances of wireless carriers is preempted. See 47 U.S.C. § 332(c)(3)(A); *Cellco P'ship v. Hatch*, 431 F.3d 1077 (8th Cir. 2005) (describing Section 332 preemption).

Lastly, at pages 5 and 6, Virgin Mobile asserts that the Department and the Commission already have sufficient other measures in place for overview of Lifeline-Only ETCs.

V. Responsive Comments of the Department of Commerce

In its Responsive Comments the Department acknowledges that both companies receiving Lifeline-only and High-Cost support though the Universal Service Fund file the FCC Form 481. While both are listed together on the USAC disbursements web page for high cost programs, state certification is only authorized for the USF high-cost companies under 47 C.F.R. § 54.314. The USAC high-cost certification web page (a secured access page) appropriately lists only those high cost program companies being certified by the Commission. Therefore, while both companies are on USAC's disbursements page,

Virgin Mobile (a Lifeline-only wireless carrier) is not on USAC's certification site to be certified by the State but, T-Mobile is (as a wireless USF high cost program carrier).

Regarding its proposed financial summary, the Department agrees that financial information is not needed by the Commission for companies receiving Lifeline-only support. Similarly, the Department acknowledges T-Mobile's assertion that the financial summary may exceed state authority regarding wireless carriers.

Nonetheless, T-Mobile does receive high-cost program support from the USF which the Commission must certify. T-Mobile receives Frozen High Cost Support which is currently capped at \$112,761 per month. This funding will be decreased to zero in the months following the award of CAF II funding. T-Mobile received reimbursements of only \$2601 in 2017, and \$6,271 to date in 2018, for Lifeline services.

The Department modifies its recommendation on the filing of a Minnesota affidavit and financial summary to exclude the financial summary from wireless carriers and Lifeline-only wireline carriers.

VI. Staff Analysis

Requested Federal Certifications

In so far as this annual review is a ministerial duty delegated to the Commission by the FCC, Staff concurs with the Department that each of the companies requesting certification appear to have met the filing requirements. Staff has verified that with the addition of Hills Tel Co (SAC# 391405) in the Department's Supplemental Comments, all companies that will be certified are contained in the list attached to the Department's comments. Staff notes that this list also contains those wireless companies filing FCC Fm. 481 under 47 C.F.R. 54.422 for the Commission's information. Those wireless companies are appropriately not listed on the USAC verification system. Upon the Commission's approval, all companies filing FCC Fm. 481 under 47 C.F.R. 54.313 will be certified via the USAC electronic system and to the FCC by USPS as per federal practice. This list is Attachment 2 in this briefing paper. Staff agrees with the Department's certification recommendation reflected in modified Option A below.

Minnesota Affidavit and Financial Summary

The Department initially proposed that all ETCs filing a FCC Fm. 481 also file in Minnesota an expanded uniform affidavit and a financial summary. The proposed affidavit would reinstate service quality and customer protection compliance affirmations. While the State has access to FCC Fm. 481 filings through the FCC database, the Department notes at pages 6-7 (as does Virgin Mobile at page 2) that different companies will make different filings. A uniform affidavit (with service quality and consumer protection affirmations) and annual financial summary will provide the Department and Commission routine, efficiently reviewed information with which to compare year to year changes and to provide appropriate oversight.

Staff believes the Department's proposed uniform affidavit and financial summary has merit for the certification review process for those companies subject to state certification of the use of USF high cost program funds. This is recommended in modified Option C below, which would include T-Mobile filing an affidavit without a financial summary (this is a single company exception), an option they did not strongly object to. Virgin Mobile wireless and other Lifeline-only wireless carriers not subject to Commission certification would not file the Minnesota affidavit and financial summary under Option C.

Decision Option D would add the Lifeline-only wireless carriers into the filing of the affidavit described in Option C (exempting their financial summary). Virgin Mobil strongly opposed the application of the both the proposed affidavit and the financial summary to wireless Lifeline-only carriers, citing limits on state authority and a lack of explanation of the proposal by the Department. While the Department has agreed that the financial summary is not applicable to wireless carriers and Lifeline-only carriers, it stills recommends they file the proposed affidavit with the State.

Virgin Mobile presents significant argument at pages 4 and 5 of its Reply Comments that application of the Department's proposed affidavit and financial summary to Lifeline-only wireless carriers, which are not certified by the Commission to the FCC, lacks both purpose and authority. Virgin Mobile raised specific concerns about individual paragraphs of the proposed affidavit and requested elaboration by the Department about their application to Lifeline-only wireless companies. The Department did not respond to those points in its Responsive Comments. Hence, there is no record supporting the specific use of the proposed affidavit if required of Lifeline-only wireless ETCs or of the authority upon which the State would rely upon in making such a requirement.

The Department notes in its September 10, 2018 Comments at p. 8 that Frontier Communications has an open investigation in which Minnesota consumers have alleged that Frontier insufficiently invests in, and maintains its network in Minnesota (Docket No. P407, P405/CI-18-122). While this may raise issues related to this filing, the Department notes that to the extent the Commission chooses to look at Frontier's use of Federal funds in more depth, it may do so in its open investigation. The Department does not recommend related action in this proceeding, nor does Staff.

Finally, in its Reply Comments T-Mobile suggested the Commission may want to clarify if it continues to wish to have FCC Fm. 481 filings submitted annually to the State. The Department is silent on the matter as is Virgin Mobile. The State now has access to all filings through the FCC web site. The Commission presently requires the annual filing with the Commission of a shorter affidavit than the Department has now proposed. Aside from the receipt of the present affidavit or the proposed affidavit and financial summary, Staff does not find the duplicate electronic filing of the FCC Fm. 481 to be useful or necessary.

VII. Decision Options

- A. Certify that all of the petitioning ETCs in Attachment 2 have used High Cost Universal Service Support received in 2017 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. **(Recommended, modified after Department)**
- B. 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 2017 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' petition for certification.
- C. Require in future years, that an officer of each company subject to state certification of its FCC Fm. 481 with the FCC shall file an affidavit with the Commission concurrently with the FCC Fm. 481 filing. Exempting wireless carriers from the Financial Summary portion, the affidavit shall confirm

- a. The position of the affiant
- b. The affiant understands and is familiar with the requirements of the FCC concerning universal service funding
- c. The funds are and will be used appropriately
- d. The company is compliant with applicable rules on service quality and consumer protection
- e. There is sufficient back up 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

Attached to the affidavit shall be a Financial Summary that shows:

- f. The sources of Federal Universal Service Receipts Subject To Certification
- g. An explanation of statewide distribution vs. study area code disbursement.
- h. Plant Specific Operations Expenses
- i. Customer Operations Expenses
- j. Corporate Operations Expenses
- k. Total Year Supported Expenses Before Return on Investment
- l. Additions
- m. 481 Financial Statement Summarized Information
- n. Corporate Expense to Operating Revenue Information

(Recommended, modified after the Department)

- D. Direct the filing of the affidavit and financial summary described in Option C for all parties filing FCC Fm. 481, excluding the Financial Summary for wireless carriers and Lifeline-only wireless carriers. **(Department Recommended)**
- E. Direct all ETCs filing annual High Cost reporting using FCC Fm. 481 to file copies with the Commission.
- F. Direct all ETCs subject to state certification of FCC Fm. 481 annual USF High Cost reporting to file copies with the Commission.

VIII. Staff Recommendations

Staff recommends Decision Options A and C.

ATTACHMENT 1

AFFIDAVIT

STATE OF MINNESOTA
COUNTY OF _____

SAC _____

- I. I am the _____ Officer of _____ *Telephone Company* and am authorized to give this affidavit on behalf of the Company. This affidavit is provided to support the Company's Request for Certification to the Minnesota Public Utilities Commission as contemplated in 47 C.F.R. § 54.314.
- 2. As an authorized representative of the Company, I hereby affirm familiarity with and an understanding of the requirements of the Federal Communications Act of 1934, as amended by the Telecommunications Act of 1996 and the USF/ICC Transformation Order of 2011, with respect to the receipt of any federal universal service funds received as interstate access support, interstate common line support, support provided to competitive eligible telecommunications carriers, Connect America Fund support, and high-cost loop support.
- 3. During 2017, the Company received federal universal service support as shown on Exhibit A to this affidavit and had investment and expenses relating to the provision, maintenance and upgrading of facilities and services for which such support was intended as also shown on Exhibit A. During 2017, the Company used the federal universal service support it received only for the provision, maintenance and upgrading of facilities and services for which the support was intended consistent with 47 U.S.C. § 254(e).
- 4. The Company certifies that it will use the federal universal service support it receives during 2019 only for the provision, maintenance and upgrading of facilities and services for which such support is intended consistent with 47 U.S.C. § 254(e).
- 5. The Company also certifies that to the best of our knowledge it is compliant with applicable rules on service quality and consumer protection rules. We also certify that we are in compliance with 47 CFR 54.202(a) (2) that the carrier be able to function in emergency operations. Specifically, the reporting carrier has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities and is capable of manager traffic spikes resulting from emergency situations.

[Name] _____, [Title] _____

Subscribed and sworn to before me this ..._day of:...._ 2018.

PUBLIC DOCUMENT - TRADE SECRET DATA HAS BEEN EXCISED

ATTACHMENT A
TO AFFIDAVIT

USF Certification for 2019
Redwood County Telephone Company (SAC 361472)

Year 2017 Federal Universal Service Receipts Subject To Certification

High Cost Loop Support	
ICLS Support	
Safety Net Additive	
Local Switching Support	
ACAM	
Connect America Fund Intercarrier Compensation	
TOTAL	

* ACAM support dollars are disbursed from USAC at a statewide basis, study area code 361385 received the total payment of \$21,559,568 on behalf of all ARVIG ENTERPRISES, INC. MN SAC.

Expenditures For Provision, Maintenance, and Upgrading Of Facilities and Services Supported By Federal Universal Service Funding

	<u>Actual</u> 2017	<u>Estimated</u> 2018	<u>2019</u>
Plant Specific Operations Expenses			
Network support (Accts. 6110-16)			
General support (Accts. 6120-24)			
Central office switching (Accts. 6210-6212.2)			
Cable and wire facilities (Accts. 6410-6441)			
Network operations (Accts. 6530-35)			
Depreciation and amortization (Accts. 6560-65)			
Customer Operations Expenses			
Customer services (Accts. 6620-23)			
Corporate Operations Expenses			
Executive and planning (Accts. 6710)			
General and administrative (Accts. 6720)			
Total Year Supported Expenses Before Return On Investment			
Additions			
Regulated Capital Additions			
Total Year Supported Expenditures Before Return On Investment			

481 FINANCIAL STATEMENT SUMMARIZED INFORMATION

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant in Service (TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

MN PUC Required Ratio (If ratio is >50% see supplemental information)

Corporate Expense	
Corporate Expense/Operating Revenues	

Attachment 2

High Cost Certification Listing from USAC website for 2018

<input type="checkbox"/>	330950	CENTURYTEL-NW WI	WI ILEC Yes No	Download
<input type="checkbox"/>	351126	CENTURYTEL-CHESTER	IA ILEC Yes No	Download
<input type="checkbox"/>	361123	CITIZENS-FRONTIER-MN	MN ILEC Yes No	Download
<input type="checkbox"/>	361337	WINNEBAGO COOP ASSN	MN ILEC Yes No	Download
<input type="checkbox"/>	361346	ACE TEL ASSN-MN	MN ILEC Yes No	Download
<input type="checkbox"/>	361347	ALBANY MUTUAL ASSN	MN ILEC Yes No	Download
<input type="checkbox"/>	361348	WILDERNESS VALLEY	MN ILEC Yes No	Download
<input type="checkbox"/>	361350	ARVIG TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361353	CITY OF BARNESVILLE	MN ILEC Yes No	Download
<input type="checkbox"/>	361356	BENTON COOP TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361358	BLUE EARTH VALLEY	MN ILEC Yes No	Download
<input type="checkbox"/>	361362	BRIDGEWATER TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361365	CALLAWAY TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361367	FRONTIER-MINNESOTA	MN ILEC Yes No	Download
<input type="checkbox"/>	361370	CLARA CITY TEL EXCH	MN ILEC Yes No	Download
<input type="checkbox"/>	361372	CLEMENTS TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361373	CONSOLIDATED TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361374	ARROWHEAD COMM CORP	MN ILEC Yes No	Download
<input type="checkbox"/>	361375	MID-COMM-HICKORYTECH	MN ILEC Yes No	Download
<input type="checkbox"/>	361381	DUNNELL TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361383	EAGLE VALLEY TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361384	EASTON TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361385	EAST OTTER TAIL TEL	MN ILEC Yes No	Download
<input type="checkbox"/>	361386	ECKLES TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361387	EMILY COOP TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361389	FARMERS MUTUAL TEL	MN ILEC Yes No	Download
<input type="checkbox"/>	361390	FEDERATED TEL COOP	MN ILEC Yes No	Download
<input type="checkbox"/>	361391	FELTON TEL CO. INC.	MN ILEC Yes No	Download
<input type="checkbox"/>	361395	GARDEN VALLEY TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361396	GARDONVILLE COOP TEL	MN ILEC Yes No	Download
<input type="checkbox"/>	361399	GRANADA TEL CO	MN ILEC Yes No	Download

<input type="checkbox"/>	361401	HALSTAD TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361403	FEDERATED UTILITIES	MN ILEC Yes No	Download
<input type="checkbox"/>	361404	HARMONY TEL. CO.	MN ILEC Yes No	Download
<input type="checkbox"/>	361405	HILLS TEL CO, INC	MN ILEC Yes No	Download
<input type="checkbox"/>	361408	HOME TEL CO - MN	MN ILEC Yes No	Download
<input type="checkbox"/>	361409	HUTCHINSON TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361410	JOHNSON TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361412	KASSON & MANTORVILLE	MN ILEC Yes No	Download
<input type="checkbox"/>	361413	MID STATE DBA KMP	MN ILEC Yes No	Download
<input type="checkbox"/>	361414	Windstream Communications, Inc.	MN ILEC Yes No	Download
<input type="checkbox"/>	361419	LISMORE COOP TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361422	LONSDALE TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361423	Runestone Telephone Association	MN ILEC Yes No	Download
<input type="checkbox"/>	361424	MABEL COOP TEL - MN	MN ILEC Yes No	Download
<input type="checkbox"/>	361425	CHRISTENSEN COMM CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361426	MANCHESTER-HARTLAND	MN ILEC Yes No	Download
<input type="checkbox"/>	361427	MANKATO-HICKORYTECH	MN ILEC Yes No	Download
<input type="checkbox"/>	361430	MELROSE TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361431	MIDWEST TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361433	MID STATE TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361439	MINNESOTA VALLEY TEL	MN ILEC Yes No	Download
<input type="checkbox"/>	361440	CANNON VLY TELECOM	MN ILEC Yes No	Download
<input type="checkbox"/>	361442	NEW ULM TELECOM, INC	MN ILEC Yes No	Download
<input type="checkbox"/>	361443	LORETEL SYSTEMS, INC	MN ILEC Yes No	Download
<input type="checkbox"/>	361445	CENTURYTEL-MINNESOTA	MN ILEC Yes No	Download
<input type="checkbox"/>	361448	OSAKIS TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361450	PARK REGION MUTUAL	MN ILEC Yes No	Download
<input type="checkbox"/>	361451	PAUL BUNYAN RURAL	MN ILEC Yes No	Download
<input type="checkbox"/>	361453	PEOPLES TEL CO - MN	MN ILEC Yes No	Download
<input type="checkbox"/>	361454	PINE ISLAND TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361456	EMBARQ MINNESOTA	MN ILEC Yes No	Download
<input type="checkbox"/>	361472	REDWOOD COUNTY TEL	MN ILEC Yes No	Download
<input type="checkbox"/>	361474	ROTHSAY TEL CO, INC	MN ILEC Yes No	Download

<input type="checkbox"/>	361475	RUNESTONE TEL ASSN	MN ILEC Yes No	Download
<input type="checkbox"/>	361476	SACRED HEART TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361479	SCOTT RICE -INTEGRA	MN ILEC Yes No	Download
<input type="checkbox"/>	361482	Windstream Communications, Inc.	MN ILEC Yes No	Download
<input type="checkbox"/>	361483	SLEEPY EYE TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361485	SPRING GROVE COOP	MN ILEC Yes No	Download
<input type="checkbox"/>	361487	STARBUCK TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361491	TWIN VALLEY-ULEN TEL	MN ILEC Yes No	Download
<input type="checkbox"/>	361494	UPSALA COOP TEL ASSN	MN ILEC Yes No	Download
<input type="checkbox"/>	361495	VALLEY TEL CO - MN	MN ILEC Yes No	Download
<input type="checkbox"/>	361499	CROSSLAKE TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361500	NORTHERN TEL CO - MN	MN ILEC Yes No	Download
<input type="checkbox"/>	361501	WEST CENTRAL TEL	MN ILEC Yes No	Download
<input type="checkbox"/>	361502	WESTERN TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361505	WIKSTROM TEL CO, INC	MN ILEC Yes No	Download
<input type="checkbox"/>	361507	WINSTED TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361508	WINTHROP TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361510	WOODSTOCK TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361512	WOLVERTON TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361515	ZUMBROTA TEL CO	MN ILEC Yes No	Download
<input type="checkbox"/>	361654	INTERSTATE TELECOMM.	MN ILEC Yes No	Download
<input type="checkbox"/>	365142	QWEST CORP-MN	MN ILEC Yes No	Download
<input type="checkbox"/>	366110	Lake County d/b/a Lake Connections	MN CETC Yes No	Download
<input type="checkbox"/>	366130	Federated Telephone Cooperative	MN CETC Yes No	Download
<input type="checkbox"/>	366132	Paul Bunyan Rural Telephone Cooperative	MN CETC Yes No	Download
<input type="checkbox"/>	366133	Paul Bunyan Rural Telephone Cooperative	MN CETC Yes No	Download
<input type="checkbox"/>	367123	CITIZENS-FRONTIER-MN	MN ILEC Yes No	Download
<input type="checkbox"/>	369014	T-Mobile Central LLC	MN CETC Yes No	Download
<input type="checkbox"/>	369015	Midcontinent Communications	MN CETC Yes No	Download
<input type="checkbox"/>	381614	POLAR TELECOMM.	ND ILEC Yes No	Download
<input type="checkbox"/>	381630	POLAR COMM MUT AID	ND ILEC Yes No	Download
<input type="checkbox"/>	381631	RED RIVER RURAL TELEPHONE ASSOC.	ND ILEC Yes No	Download
<input type="checkbox"/>	391405	HILLS TEL CO-SD	SD ILEC Yes No	Download

391657 SPLITROCK TELECOM COOPERATIVE INC. SD ILEC Yes No [Download](#)