

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
Nancy Lange
Dan Lipschultz
Matthew Schuerger
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

To: All Minnesota Eligible
Telecommunications Carriers (ETCs)

SERVICE DATE: January 17, 2017

DOCKET NO. P999/PR-16-20

In the Matter of 2015 Lifeline Re-certification Results

The above entitled matter has been considered by the Commission and the following disposition made:

Accepted the Department's analysis regarding the ETC's 2015 Lifeline recertification surveys:

- a. All ETCs have complied with the requirement to submit their re-certification results to the Commission, and the re-certification results comply with required re-certification procedures.**
- b. To minimize de-enrollments, use of the DHS or a state database is encouraged to validate eligible subscribers and reduce the number of Lifeline subscribers needing direct contact. Companies that use USAC for Lifeline recertification are also encouraged to use the DHS or a state database under the FCC's revised procedures.**
- c. All ETCs shall file their 2016 FCC Form 555 Lifeline survey results by January 31, 2017.**

This decision is issued by the Commission's consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION



Daniel P. Wolf
Executive Secretary

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July 25, 2016

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

RE: **Comments of the Minnesota Department of Commerce**
Docket No. P999/M-16-20

Dear Mr. Wolf:

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

2015 Lifeline Re-certification Results

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the 2015 Lifeline re-certification filings. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ BRUCE L. LINSCHIED
Financial Analyst

BLL/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. P999/M-16-20

I. BACKGROUND

On February 6, 2012, the Federal Communications Commission (FCC) released its Lifeline and Linkup Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 11-42, 03-109, 12-23 and CC Docket No. 96-45 (Lifeline Reform Order).

The federal Lifeline program subsidizes local telecommunications services provided to qualified low-income consumers by local service providers designated as “eligible telecommunications carriers” or ETCs.¹ Lifeline provides a monthly discount of \$9.25.² Minnesota’s Telephone Assistance Plan (TAP) provides an additional discount of \$3.50 to qualified low-income consumers in the form of monthly credits on consumers’ telephone bills. TAP is a required offering by all incumbent and competitive local exchange carriers (ILECs and CLECs).³

Link-Up provides a 100 percent reduction, up to \$100 off installation charges to qualifying residents of Tribal lands.

The following subscriber eligibility criteria currently⁴ apply to the TAP and Lifeline programs:

- 1) Total household income does not exceed 135 percent of the Federal Poverty Guidelines; or
- 2) Participation in one (or more) of the following programs:
 - Medicaid (medical Assistance)
 - Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps)
 - Supplemental Security Income (SSI)

¹ Under the Federal Telecommunications Act of 1996, telecommunications carriers must be designated “eligible telecommunications carriers,” or ETCs to qualify for subsidies from the federal Universal Service Fund (47 U.S.C. §254 (e)).

² 47 U.S.C. §54.403(a)(1).

³ Commissions Order, *In the Matter of the Telephone Assistance Plan Credit and Surcharge Levels*, Docket No. P999/CI-13-213, July 10, 2013.

⁴ The Lifeline Modernization Order (FCC 16-38) released on April 27, 2016 revised the eligibility criteria effective December 1, 2016.

- Federal Public Housing Assistance
- Low-Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Temporary Assistance to Needy Families (TANF)

Low-income consumers living on Tribal lands may also qualify by participation in one of several additional assistance programs:

- Bureau of Indian Affairs general assistance
- Tribally administered TANF
- Head Start only for those meeting income-qualifying standards

On June 14, 2012, the Commission issued its order in Docket No. P-999/M-12-194 in which it directed ETCs to implement the FCC's Lifeline certification and annual re-certification requirements described in the Lifeline Reform Order. Subsequent orders were issued in 2013, 2014 and 2015 in Docket Nos. 12-1315, 14-20 and 15-20 requiring ETCs to submit the results of their annual Lifeline re-certification efforts. ETCs submit the results of their re-certification efforts on FCC Form 555, and the Department reports the results of each year's survey.

II. STATEMENT OF ISSUES

What actions, if any, should the Commission take with respect to the Lifeline re-certification filings submitted by ETCs for 2015?

III. APPLICABLE LAW

47 C.F.R § 54.410 (*"Annual eligibility re-certification process"*)

(f) Subpart (1) requires that all ETCs must annually re-certify all Lifeline subscribers.

(f) Subpart (2) describes the methods by which an ETC must confirm a subscriber's eligibility to receive Lifeline benefits.

(f) Subpart (5) provides that "if an eligible telecommunications carrier is unable to re-certify a subscriber . . . , the eligible telecommunications carrier must comply with the de-enrollment requirements provided for in § 54.405(e) (4)."

47 C.F.R. §54.405 (e) (4) (*"De-enrollment for failure to re-certify"*) provides that:

[A]n eligible telecommunications carrier must de-enroll a Lifeline subscriber who does not respond to the carrier's attempts to obtain re-certification of the subscriber's continued eligibility as required by § 54.410(f); who fails to provide the annual one-per-household re-certifications as required by § 54.410(f); or who relies on a temporary address and fails to

respond to the carrier's address re-certification attempts pursuant to § 54.410(g).

and requires that:

Prior to de-enrolling a subscriber under this paragraph, the eligible telecommunications carrier must notify the subscriber in writing separate from the subscriber's monthly bill, if one is provided using clear, easily understood language, that failure to respond to the re-certification request within 30 days of the date of the request will trigger de-enrollment. If a subscriber does not respond to the carrier's notice of impending de-enrollment, the carrier must de-enroll the subscriber from Lifeline within five business days after the expiration of the subscriber's time to respond to the re-certification efforts.

47 C.F.R. §54.416(b) (*"Annual certifications by eligible telecommunications carriers"*) requires that:

All eligible telecommunications carriers must annually provide the results of their re-certification efforts, performed pursuant to § 54.410(f), to the [Federal Communications] Commission and the Administrator. Eligible telecommunications carriers designated as such by one or more states pursuant to § 54.201 must also provide, on an annual basis, the results of their re-certification efforts to state commissions for subscribers residing in those states where the state designated the eligible telecommunications carrier. Eligible telecommunications carriers must also provide their annual re-certification results for subscribers residing on Tribal lands to the relevant Tribal governments.

To the extent that a state agency database is used to conduct recertification for all or a portion of an ETC's Lifeline subscribers, only those subscribers that were not identified in the database need to be surveyed. In 2016, for the first time, Minnesota ETCs could recertify Lifeline subscribers through a state database, such as is available through the Minnesota Department of Human Services, and submit the names of any remaining Lifeline subscribers to USAC for verification via customer surveys.⁵ Therefore, prior to transmittal to USAC, the ETC is to remove from its subscriber list those subscribers that are subject to the state agency's recertification process. It appears that this process was not used because it was not well known prior to the current recertification process.

⁵ Federal Communications Commission, Public Notice, Wireline Competition Bureau Provides Guidance to Eligible Telecommunications Carriers on the Process to Elect USAC to Perform Lifeline Recertification, WC Docket 11-42, Rel. April 1, 2016.

IV. ANALYSIS

A. YEARLY COMPARISON OF RE-CERTIFICATION DATA

The 2015 re-certification results were submitted by ETCs to comply with Paragraph 148 of FCC's Lifeline Order and Section 47 C.F.R. 54.416(b) of the FCC's Rules. The 2012 - 2015 results are presented in the FCC Form 555 format submitted by ETCs and summarized below. The supporting data is provided in Attachment 1.

Subscribers to be Re-certified	Subscribers Contacted Directly	Responding Subscribers	Non-responding Subscribers	Ineligible Subscribers Contacted Directly	Subscribers De-enrolled Contacted Directly	Subscribers Reviewed by Database or USAC	Subscribers De-enrolled by Database or USAC	Total Subscribers De-enrolled
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			(d=b-c)	(e/b)	(f=d+e)			(i=f+h)
2015								
56,354	47,709	37,469	10,219	231	10,450	9,033	1,061	11,511
			21.4%	.5%	21.9%		11.7%	20.3%
2014								
64,509	58,458	37,818	20,640	646	21,286	7,720	2,413	23,699
			35.3%	1.1%	36.4%		31.3%	35.8%
2013								
63,302	39,002	31,018	7,983	641	8,624	4,803	1,811	10,435
			20.5%	1.6%	22.1%		37.7%	16.5%
2012								
72,327	70,615	30,440	30,140	467	30,599	1,712	253	30,852
			42.75%	.7%	43.5%		14.8%	42.6%

(a). Number of subscribers subject to re-certification: All Lifeline subscribers must re-certify annually in accordance with Paragraph 130 of the Lifeline Order and Section 47 C.F.R. 54.410(f) subp. 1 of the FCC's Rules. The number of Lifeline subscribers needing to be surveyed declined from 72,327 in 2012 to 56,354 in 2015 (Column (a) and Attachment 1, Column E).

(b) - (f). Number of subscribers de-enrolled as a result of ETCs' direct contact surveys: The de-enrollment rate for Lifeline subscribers surveyed by direct contact declined significantly from 43.3% in 2012, to 21.9% in 2015 (Column (f) and Attachment 1, Column J).

(g)-(h). Number of subscribers de-enrolled by ETCs utilizing a state database or USAC: The de-enrollment rate for Lifeline subscribers by those companies using a state database or surveyed by USAC increased from 14.8% in 2012 to 37.7% in 2013, decreased to 31.3% in 2014, and decreased significantly to 11.7% in 2015 (Column H and Attachment 1, Column L). ETCs were able to have USAC conduct Lifeline subscribers' surveys for the first time in 2013. Data base recertification employed the Minnesota Department of Human Services (DHS), or other databases, such as Wisconsin Cares and North Dakota Human Services for companies whose operations are primarily in neighboring states.

(i). Overall de-enrollment rate: The total number of Lifeline subscribers de-enrolled declined from 30,852 or 42.6% of total Lifeline subscribers surveyed in 2012 to 11,515 or 20.3% of total Lifeline subscribers surveyed in 2015 (Column (i) and Attachment 1, Column O).

B. WHAT OBSERVATIONS EMERGE FROM THE RESULTS OF THE 2015 RE-CERTIFICATION EFFORTS?

1. The number of Lifeline subscribers required to be recertified has declined since 2012. The 56,354 Lifeline subscribers required to be surveyed in 2015 declined from the 64,509 Lifeline subscribers surveyed in 2014, the 63,302 Lifeline subscribers surveyed in 2013, and the 72,327 Lifeline subscribers surveyed in 2012 (Attachment 1, Column E). The decline reflects Lifeline subscribers de-enrolled because they either did not respond to recertification surveys, or no longer met the eligibility requirements for continued Lifeline benefits.
2. The de-enrollment rate for Lifeline subscribers is also declining along with the number of Lifeline subscribers required to be recertified since 2012. The 2015 overall de-enrollment rate of 20.3% declined from the 2014 overall de-enrollment rate of 35.8%, and was up from 16.5% in 2013, but down from 42.6% in 2012 (Attachment 1, Column O). This trend suggests that Lifeline subscribers who previously qualified for benefits are less likely to be de-enrolled in subsequent recertification efforts.
3. For Lifeline subscribers surveyed directly by a wireless or wireline ETC, non-response continues to be the largest factor in de-enrollment (10,219 or 21.4% of Lifeline subscribers required to be recertified did not respond to being directly contacted by ETCs in 2015). Only 231 or .5% of Lifeline subscribers contacted directly by an ETC were de-enrolled because they were ineligible or did not meet the qualifying requirements for Lifeline benefits. (Attachment 1, Columns H and I).
4. ETCs that chose to use USAC to recertify their Lifeline subscribers in 2015 experienced a significant reduction in the de-enrollment rate of Lifeline subscribers, but the number of customers de-enrolled remains significant. The de-enrollment rate for ETCs that relied on USAC to recertify their Lifeline subscribers in 2015 was 32.7% compared to 56.7% in 2014 and 56.8% in 2013, the first year that USAC was available to survey Lifeline subscribers (Attachment 2, Column O).
5. Combining a state or DHS data base verification with direct contact of remaining (non-verified) Lifeline subscribers continues to produce the lowest percentage of Lifeline de-enrollments. The de-enrollment rate for wireline ETCs that chose to contact their Lifeline subscribers after first submitting them to a database for verification has declined to 8.8% in 2015 (Attachment 3, Column O). The corresponding de-enrollment rate for wireless ETCs was 15.7%, and the corresponding rate for combined wireline and wireless ETCs was 15.0% (attachment 6, Column O).

6. The de-enrollment rate for ETCs that directly contacted their Lifeline subscribers, but did not use USAC or a database, was 26.2%, about the same (27.5%) as in 2014, down from 28.5% in 2013 and 43.3% in 2012 (Attachment 4, Column O).
7. The Department continues to consider the de-enrollment results of the prepaid wireless ETCs separately from other carriers who used the direct contact method because of their significant presence and the nature of their eligibility. Lifeline subscribers of prepaid wireless ETCs represent 37,996 of 56,354 or 67.4% of all Lifeline subscribers requiring recertification in 2015 (Attachment 5, Column E /Attachment 1, Column E). Lifeline subscribers of prepaid wireless ETCs also have significantly higher de-enrollments prior to recertification or churn in customers. Prepaid wireless ETC Lifeline subscribers who de-enrolled prior to recertification represented 24,503 out of a total of 25,531 or 96.0% of Lifeline subscribers de-enrolled prior to recertification in 2015 (Attachment 5, Column D/Attachment 1, Column D).

Prepaid wireless ETC Lifeline subscribers had a significant improvement in their de-enrollment rate from 38.4% in 2014 to 17.9% in 2015 (Attachment 5, Column O). The results in 2014 reflected a significant increase in total subscriber lines and lines required to be recertified. Total prepaid wireless subscribers increased from 40,219 Lifeline subscribers in 2013 to 75,852 Lifeline subscribers in 2014 (Attachment 5, Column A). The corresponding number of wireless ETC Lifeline subscribers required to be recertified increased from 20,242 in 2013 to 41,019 in 2014 (Attachment 5, Column E). The total number of prepaid wireless ETC Lifeline subscribers and those required to be recertified declined to 68,648 and 37,996 respectively in 2015 (Attachment 5, Columns A and E). The de-enrollment rate experienced by prepaid wireless ETCs in 2015 (17.9%) is returning to the level reported in 2013 (16.2%) after a spike in the de-enrollment rate in 2014 (38.4%) (Attachment 5, Column O).

C. *DEPARTMENT FINDINGS*

1. All ETCs have complied with the requirement to submit their re-recertification results to the Commission. The re-certifications comply with required re-certification procedures of the Lifeline Order and the Commission's Order in Docket No. 15-20 after discussions to clarify misunderstandings in the data filed, as reflected on Attachment 1, were conducted between the ETCs and the Department.

2. The number of Lifeline subscribers subject to recertification and the over-all de-enrollment rate are trending downward (Attachment 1, Columns O and N).

<u>Year</u>	<u>Subscribers to Recertify</u>	<u>De-enrollment Rate/ subscribers</u>
2012	72,327	42.63% or 30,852
2013	63,302	16.48% or 10,435
2014	64,509	35.81% or 23,699*
2015	56,354	20.29% or 11,511

* see Section IV.B.7 of these comments

3. The 2015 de-enrollment rates for the various recertification procedures were:
- USAC- 32.7% (Attachment 2, Column O)
 - DHS/state database verification then direct contact- 8.8% for wireline ETCs, (Attachment 3, Column O), 15.7% for wireless ETCs, and 15% for combined wireline and wireless ETCs.
 - Direct contact only 26.2 % (excluding the Prepaid Wireless ETCs) (Attachment 4, Column O)
 - Prepaid Wireless ETCs 17.9% (Attachment 5, Column O)
4. Re-certification through USAC continues to produce the highest rate of de-enrollments of Lifeline subscribers in 2015 (32.7%), although the de-enrollment rate declined from 56.7% in 2014. The higher de-enrollment percentage for ETCs that chose to use USAC to recertify their Lifeline subscribers may be partially due to those ETCs not being permitted to subsequently contact the subscriber.⁶
5. Prepaid wireless ETCs continue to have the majority of Lifeline subscribers subject to re-certification (37,996) out of a total number of Lifeline subscribers subject to recertification of 56,354 or 67.4% in 2015 (Attachment 5, Column E/Attachment 1, Column E). Their de-enrollment rate increased to 38.4% in 2014, which correlates with the significant increase in prepaid wireless Lifeline subscribers. The de-enrollment rate declined to 17.9% in 2015, or closer to the 16.2% rate previously experienced in 2013 (see Section IV.B.7 of these comments).
6. Non-response by Lifeline subscribers continues to be the largest cause of de-enrollments. ETCs that used the DHS or a state database and then direct contact with remaining subscribers to recertify their Lifeline subscribers continue to have the lowest de-enrollment rate by reducing the number of Lifeline subscribers needing to respond to a survey.(see Section IV.B.3 and B5 of these comments).

⁶ Wireline Competition Bureau Provides Guidance to Eligible Telecommunications Carriers on the Process to Elect USAC to Perform Lifeline Recertification, WC Docket No. 11-42, Rel. Mar. 5, 2014, Footnote 2, Lifeline Reform Order, 27 FCC at 6716, para. 133 n. 346.

V. COMMISSION ALTERNATIVES

1. Accept the Department's analysis regarding the ETC's 2015 Lifeline recertification surveys:
 - a. All ETCs have complied with the requirement to submit their re-recertification results to the Commission, and the re-certification results comply with required re-certification procedures.
 - b. To minimize de-enrollments, use of the DHS or a state database is encouraged to validate eligible subscribers and reduce the number of Lifeline subscribers needing direct contact. Companies that use USAC for Lifeline recertification are also encouraged to use the DHS or a state database under the FCC's revised procedures.⁷
 - c. Order all ETC to file their 2016 FCC Form 555 Lifeline survey results by January 31, 2017.
2. Accept the Departments analysis regarding the ETC's 2015 Lifeline recertification surveys with modifications.
3. Reject the Departments analysis regarding the ETC's 2015 Lifeline recertification surveys.

VI. RECOMMENDATION

The Department recommends Alternative 1:

Accept the Department's analysis regarding the ETC's 2015 Lifeline recertification surveys:

- a. All ETCs have complied with the requirement to submit their re-recertification results to the Commission, and the re-certification results comply with required re-certification procedures.
- b. To minimize de-enrollments, use of the DHS or a state database is encouraged to validate eligible subscribers and reduce the number of Lifeline subscribers needing direct contact. Companies that use USAC for Lifeline recertification are also encouraged to use the DHS or a state database under the FCC's revised procedures.
- c. Order all ETC to file their 2015 FCC Form 555 Lifeline survey results by January 31, 2017.

/lt

⁷ Federal Communications Commission, Public Notice, Wireline Competition Bureau Provides Guidance to Eligible Telecommunications Carriers on the Process to Elect USAC to Perform Lifeline Recertification, WC Docket 11-42, Rel. April 1, 2016.

2015 ETC Lifeline Re-Certification Results

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	Filed Data					# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility data base or USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
						# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled					
						F	G	H	I	J					
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)
Ace Telephone Association 361346	189	0	1	8	180	180	155	25	1	26	0	0	180	26	14.44
Albany Mutual Telephone Association	82	0	7	5	70	0	0	0	0	0	70	38	70	38	54.29
Alliance ETC- (Hills)	19	0	1	3	15	15	13	2	1	3	0	0	15	3	20.00
American Broadband and Telecommunications Arrowhead Communications Corporation- see Arvig Enterprises, Inc.	163	0	42	15	106	106	18	88	0	88	0	0	106	88	83.02
Arvig Enterprises, Inc.															
(1) Arrowhead Communications Corporation	20	0	2	0	18	0	0	0	0	0	18	10	18	10	55.56
(2) Callaway Telephone Company, Inc.	11	0	1	1	9	0	0	0	0	0	9	3	9	3	33.33
(3) Clements Telephone Co.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
(4) Eagle Valley Telephone Company	25	0	2	1	22	0	0	0	0	0	22	11	22	11	50.00
(5) East Otter Tail Telephone Company	378	0	74	28	276	0	0	0	0	0	276	98	276	98	35.51
(6) Felton Telephone Company	5	0	2	0	3	0	0	0	0	0	3	0	3	0	0.00
(7) Home Telephone Company	18	0	3	3	12	0	0	0	0	0	12	3	12	3	25.00
(8) Loretel Systems Inc.	171	0	35	6	130	0	0	0	0	0	130	55	130	55	42.31
(9) Melrose Telephone Company	211	0	43	14	154	0	0	0	0	0	154	54	154	54	35.06
(10) Midwest Telephone Company	69	0	2	7	60	0	0	0	0	0	60	16	60	16	26.67
(11) Osakis Telephone Company	22	0	0	1	21	0	0	0	0	0	21	8	21	8	38.10
(12) The Peoples Telephone Co. of Bigfork	38	0	2	2	34	0	0	0	0	0	34	14	34	14	41.18
(13) Redwood County Telephone Company	41	0	1	6	34	0	0	0	0	0	34	10	34	10	29.41
(14) Tekstar Communications Inc.	407	0	60	24	323	0	0	0	0	0	323	120	323	120	37.15
(15) TwinValley-Ulen Telephone Company	139	0	13	13	113	0	0	0	0	0	113	42	113	42	37.17
Arvig Telephone Company- see TDS															
City of Barnesville Municipal Telephone	42	0	0	0	42	42	42	0	0	0	0	0	42	0	0.00
Benton Coop Tel Co	61	0	3	3	55	55	45	10	0	10	0	0	55	10	18.18
Blue Earth Valley Telephone Company- see Rural Communications Holding Corp															
Blue Jay Wireless LLC	1627	0	2	1213	412	282	40	242	0	242	130	0	412	242	58.74

2015 ETC Lifeline Re-Certification Results

ETC	2015 ETC Lifeline Re-Certification Results														
						Filed Data									
	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de-enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility data base or USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de-enrolled by non-response or ineligibility	Percent of Subscribers de-enrolled
A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M=(F+K)	N N=(J+L)	O O=((N/M)*100)	
Eckles Telephone Company- see Rural Communications Holding Corp															
Emily Cooperative Tel Farmers-Federated	36	0	0		36	36	29	7	0	7	0	0	36	7	19.44
(1) Farmers Mutual Tel (361389)	25	0	0	1	24	10	8	2	1	3	14	0	24	3	12.50
(2) Farmers Mutual Technologies Inc. (369020)	7	0	1	0	6	0	0	0	0	0	6	0	6	0	0.00
(3) FederatedTelephone Coop (369021)	52	0	0	1	51	17	15	2	1	3	34	0	51	3	5.88
Felton Telephone Company- see Arvig Enterprises, Inc. Frontier Communications Corp.															
(1) Citizens Tel of Minnesota (361123)	713	0	31	59	623	0	0	0	0	0	623	174	623	174	27.93
(2) Citizens Tel of Minnesota (367123)	25	0	1	0	24	0	0	0	0	0	24	2	24	2	8.33
(3) Frontier Communications of MN	528	0	31	53	444	0	0	0	0	0	444	130	444	130	29.28
Garden Valley Tel Co	265	0	0	23	242	23	16	7	4	11	242	0	265	11	4.15
Gardonsville Coop Tel Assn	50	0	0	0	50	0	0	0	0	0	55	9	55	9	16.36
Global Connection Inc of America	1	0	1	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Granada Telephone Company- see Rural Communications Holding Corp															
Halstad Telephone Company Hanson Communications, Inc.	19	0	0	0	19	0	0	0	0	0	19	1	19	1	5.26
(1) Clara City Telephone Co	37	0	0	0	37	37	34	3	0	3	0	0	37	3	8.11
(2) Sacred Heart Telephone Co	12	0	0	0	12	12	8	4	0	4	0	0	12	4	33.33
(3) Starbuck Telephoone Co	58	0	0	0	58	58	42	16	0	16	0	0	58	16	27.59
(4) Zumbrota Telepoone Co	27	0	0	0	27	27	22	5	0	5	0	0	27	5	18.52
Harmony Telephone Company (MSG Tel, Inc.- holding company)	34	0	3	3	28	28	28	0	2	2	0	0	28	2	7.14
Home Telephone Company- see Arvig Enterprises, Inc. Hutchinson Telephone Company- see NU Telecom, Inc.															
I-Wireless LLC	12621	0	1544	6790	4287	4287	2444	1843	5	1848	0	0	4287	1848	43.11
Interstate Telecommunications	47	0	0	0	47	47	46	1	0	1	0	0	47	1	2.13
Johnson Telephone Company	118	0	7	10	101	101	91	10	0	10	0	0	101	10	9.90
KMP d/b/a Mid-State Tel Co.- see TDS															
Kasson & Mantorville Tel Co Larson Utilities, Inc.	47	0	10	14	23	23	23	0	2	2	0	0	23	2	8.70
(1) Minnesota Valley Telephone Company	9	0	0	0	9	9	9	0	0	0	0	0	9	0	0.00

2015 ETC Lifeline Re-Certification Results

ETC	2015 ETC Lifeline Re-Certification Results Filed Data															
	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility data base or USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled	
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M=(F+K)	N N=(J+L)	O O=((N/M)*100)	
(1) Polar Telecommunications Inc. 381614	46	0	0	2	44	44	31	13	1	14	0	0	44	14	31.82	
(2) Polar Communications Mutual Aid Corp. 381630	149	0	1	8	140	140	109	31	0	31	0	0	140	31	22.14	
(3) Wolverton Telephone Co. 361512	1	0	0	0	1	1	1	0	0	0	0	0	1	0	0.00	
Q Link Wireless LLC (Quadrant Holdings Group LLC)	9338	0	1071	1395	6872	6350	6306	44	3	47	522	0	6872	47	0.68	
Red River Rural Telephone Assoc.	12	0	0	0	12	12	8	4	0	4	0	0	12	4	33.33	
Redwood County Telephone Co- see Arving Enterprises, Inc.	34	0	0	2	32	0	0	0	0	0	32	14	32	14	43.75	
Rothsay Telephone Co.	10	0	1	0	9	9	9	0	0	0	0	0	9	0	0.00	
Runestone Telecom Assn- 361423	10	0	1	0	9	0	0	0	0	0	9	5	9	5	55.56	
Runestone Telecom Assn- 361475	86	0	9	12	65	0	0	0	0	0	65	24	65	24	36.92	
Rural Communications Holding Corporation																
(1) Blue Earth Valley Telephone Co	218	0	0	12	206	35	24	11	0	11	171	0	206	11	5.34	
(2) Cannon Valley Telecom, Inc.	49	0	0	1	48	7	4	3	0	3	41	0	48	3	6.25	
(3) Easton Telephone Company	23	0	0	0	23	3	1	2	0	2	20	0	23	2	8.70	
(4) Eckles Telephone company	49	0	0	1	48	15	14	1	0	1	33	0	48	1	2.08	
(5) Granada Telephone Company	4	0	0	0	4	1	1	0	0	0	3	0	4	0	0.00	
(6) Pine Island Telephone Company	36	0	0	2	34	5	4	1	0	1	29	0	34	1	2.94	
Sacred Heart Telephone Co- see Hanson Communications																
Sage Telecom Communications LLC (TSC Acquisition Corporation)-Did not claim support	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	
Scott Rice Tel Co dba Integra Telecom (Integra Telecom Holding Inc.)	78	0	2	0	76	76	74	2	0	2	0	0	76	2	2.63	
Sleepy Eye Telephone Co see NU- Telecom, Inc.																
Spring Grove Comm	54	0	0	6	48	48	44	4	1	5	0	0	48	5	10.42	
Starbuck Telephone Co-see Hanson Communications																
T-Mobile Central LLC	187	0	22	125	40	40	27	13	0	13	0	0	40	13	32.50	
TAG Mobile LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	
TDS Telecommunications Corporation																
(1) Arvig Telephone Company	213	0	7	20	186	186	145	41	0	41	0	0	186	41	22.04	

2015 ETC Lifeline Re-Certification Results

ETC	2015 ETC Lifeline Re-Certification Results Filed Data														
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	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M=(F+K)	N N=(J+L)	O O=((N/M)*100)
(2) Bridgewater Telephone Co	58	0	2	4	52	47	5	0	5	0	0	52	5	9.62	
(3) KMP d/b/a Mid-State Tel Co.	4	0	0	4	0	0	0	0	0	0	0	0	0	#DIV/0!	
(4) Mid-State Telephone Company	115	0	2	6	107	88	19	0	19	0	0	107	19	17.76	
(5) Winsted Telephone Company	21	0	0	3	18	14	4	0	4	0	0	18	4	22.22	
Tekstar Communications Inc.- see Arvig Enterprises, Inc.															
Telrite Corporation d/b/a Life Wireless	21693	0	1856	9686	10151	6244	3871	2373	32	2405	3907	0	10151	2405	23.69
Tempo Telecom LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	
TerraCom, Inc.	764	0	8	340	416	47	47	0	2	2	369	109	416	111	26.68
Total Call Mobile Inc. (subsidiary of KDDI America, Inc.)	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	
Twin Valley-Ulen Telephone Co. - see Arvig Enterprises, Inc.															
Upsala Coop Tel Assn	36	0	0	4	32	32	26	6	0	6	0	0	32	6	18.75
Valley Tel Co (Affiliate of Park Region Tel Co)	8	0	3	0	5	5	3	2	1	3	0	0	5	3	60.00
Virgin Mobile USA, LP	17017	0	1077	3314	12626	12978	11898	1080	139	1219	0	0	12978	1219	9.39
West Central Tel Assn.	77	0	1	9	67	67	58	9	6	15	0	0	67	15	22.39
Western Telepone Company see NU- Telecom, Inc.															
Wikstrom Telephone Co., Inc.	214	0	2	9	203	31	26	5	1	6	172	0	203	6	2.96
Wilderness Valley Tel Co (affiliate of Northern Tel Co)	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
Windstream Communications															
(1) Windstream Communications LLC- 361414	157	0	5	38	114	114	110	4	0	4	0	0	114	4	3.51
(2) Windstream Communications LLC- 361482	62	0	5	5	52	52	33	19	0	19	0	0	52	19	36.54
Winnebago Coop Telecom Association 316337	10	0	2	0	8	0	0	0	0	0	8	4	8	4	50.00
Winnebago Coop Telecom Association 369029	1	0	0	0	1	0	0	0	0	0	1	1	1	1	100.00
Winsted Telephone Co. see TDS															
Winthrop Tel- see Larson Utilities, Inc.															
Wolverton Telephone Co. 361512- see PolarTel															
Woodstock Tel Co	30	0	1	6	23	23	23	0	1	1	0	0	23	1	4.35
Zumbrota Telephone Co- see Hanson Communications, Inc.					0			0		0			0	0	#DIV/0!
2015 Totals	89070	163	7022	25531	56354	47709	37469	10219	231	10450	9033	1061	56734	11511	20.29
2014	101425	190	8885	27841	64509	58458	37818	20640	646	21286	7720	11.7%	66178	23699	35.81
2013	68081				63302	39002	31018	7983	641	8624	4803	31.3%	63302	10435	16.48
								20.5%		22.1%		37.7%			

2015 ETC Lifeline Re-Certification Results
Filed Data

Attachment 1

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility data base or USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M=(F+K)	N N=(J+L)	O O=((N/M)*100)
2012	86891				72327	70615	30440	30140 42.7%		30599 43.3%	1712	253 14.8%	72377	30852	42.63

2015 ETC Lifeline Re-Certification Results
USAC Companies

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by USAC	# of subscribers de-enrolled by USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
Albany Mutual Telephone Association	82	0	7	5	70	0	0	0	0	0	70	38	70	38	54.29
Arvig Enterprises, Inc.															
(1) Arrowhead Communications Corporation	20	0	2	0	18	0	0	0	0	0	18	10	18	10	55.56
(2) Callaway Telephone Company, Inc.	11	0	1	1	9	0	0	0	0	0	9	3	9	3	33.33
(3) Clements Telephone Co.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
(4) Eagle Valley Telephone Company	25	0	2	1	22	0	0	0	0	0	22	11	22	11	50.00
(5) East Otter Tail Telephone Company	378	0	74	28	276	0	0	0	0	0	276	98	276	98	35.51
(6) Felton Telephone Company	5	0	2	0	3	0	0	0	0	0	3	0	3	0	0.00
(7) Home Telephone Company	18	0	3	3	12	0	0	0	0	0	12	3	12	3	25.00
(8) Loretel Systems Inc.	171	0	35	6	130	0	0	0	0	0	130	55	130	55	42.31
(9) Melrose Telephone Company	211	0	43	14	154	0	0	0	0	0	154	54	154	54	35.06
(10) Midwest Telephone Company	69	0	2	7	60	0	0	0	0	0	60	16	60	16	26.67
(11) Osakis Telephone Company	22	0	0	1	21	0	0	0	0	0	21	8	21	8	38.10
(12) The Peoples Telephone Co. of Bigfork	38	0	2	2	34	0	0	0	0	0	34	14	34	14	41.18
(13) Redwood County Telephone Company	41	0	1	6	34	0	0	0	0	0	34	10	34	10	29.41
(14) Tekstar Communications Inc.	407	0	60	24	323	0	0	0	0	0	323	120	323	120	37.15
(15) TwinValley-Ulen Telephone Company	139	0	13	13	113	0	0	0	0	0	113	42	113	42	37.17
Frontier Communications Corp.															
(1) Citizens Tel of Minnesota (361123)	713	0	31	59	623	0	0	0	0	0	623	174	623	174	27.93
(2) Citizens Tel of Minnesota (367123)	25	0	1	0	24	0	0	0	0	0	24	2	24	2	8.33
(3) Frontier Communications of MN	528	0	31	53	444	0	0	0	0	0	444	130	444	130	29.28
Halstad Telephone Company	19	0	0	0	19	0	0	0	0	0	19	1	19	1	5.26
Midcontinent Communications (1)	190	0	25	18	147	8	8	0	0	0	147	33	147	33	22.45
Runestone Telecom Assn- 361423	10	0	1	0	9	0	0	0	0	0	9	5	9	5	55.56
Runestone Telecom Assn- 361475	86	0	9	12	65	0	0	0	0	0	65	24	65	24	36.92

**2015 ETC Lifeline Re-Certification Results
USAC Companies**

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	2015 ETC Lifeline Re-Certification Results					# of subscribers reviewed by USAC	# of subscribers de-enrolled by USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
						# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled					
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M	N	O
Winnebago Coop Telecom Association 316337	10	0	2	0	8	0	0	0	0	0	8	4	8	4	50.00
Winnebago Coop Telecom Association 369029	1	0	0	0	1	0	0	0	0	0	1	1	1	1	100.00
2015 Totals	3219	0	347	253	2619	8	8	0	0	0	2619	856	2619	856	32.68
2014 Results	3729	0	81	0	3648	5	5	0	0	0	3162	1796	3167	1796	56.71
2013								0.0%		0.0%		32.7%	3162	1796	56.80

(1) USAC first attempted recertification of 147 subscribers. Eight subscribers subsequently directly contacted. USAC advised carrier to enter 147 subscribers in Block K/Column E.

2015 ETC Lifeline Re-Certification Results

Wireline Data base & Direct Contact Companies

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base	# of subscribers de-enrolled by state, eligibility data base	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
CenturyLink															
CenturyLink-NW Wisc	227	0	2	21	204	54	34	20	0	20	150	0	204	20	9.80
Consolidated Communications, Inc.															
(1) Mankato Citizens Tel Co	471	0	35	3	433	263	247	16	0	16	170	52	433	68	15.70
(2) Mid-Communications, Inc.	158	0	12	0	146	85	82	3	0	3	61	21	146	24	16.44
Consolidated Tel Co	153	0	1	12	140	18	12	6	0	6	122	0	140	6	4.29
(1) C-I Communications	39	0	0	2	37	9	6	3	0	3	28	0	37	3	8.11
Farmers-Federated															
(1) Farmers Mutual Tel (361389)	25	0	0	1	24	10	8	2	1	3	14	0	24	3	12.50
(2) Farmers Mutual Telephone Company (369020)	7	0	1	0	6	0	0	0	0	0	6	0	6	0	0.00
(3) FederatedTelephone Coop (369021)	52	0	0	1	51	17	15	2	1	3	34	0	51	3	5.88
Garden Valley Tel Co	265	0	0	23	242	23	16	7	4	11	242	0	265	11	4.15
Gardonville Coop Tel Assn	50	0	0	0	50	0	0	0	0	0	55	9	55	9	16.36
Lonsdale Tel	19	0	2	0	17	0	17	0	0	0	17	0	17	0	0.00
Rural Communications Holding Corporation															
(1) Blue Earth Valley Telephone Co	218	0	0	12	206	35	24	11	0	11	171	0	206	11	5.34
(2) Cannon Valley Telecom, Inc.	49	0	0	1	48	7	4	3	0	3	41	0	48	3	6.25
(3) Easton Telephone Company	23	0	0	0	23	3	1	2	0	2	20	0	23	2	8.70
(4) Eckles Telephone company	49	0	0	1	48	15	14	1	0	1	33	0	48	1	2.08
(5) Granada Telephone Company	4	0	0	0	4	1	1	0	0	0	3	0	4	0	0.00
(6) Pine Island Telephone Company	36	0	0	2	34	5	4	1	0	1	29	0	34	1	2.94
Wikstrom Telephone Co., Inc.	214	0	2	9	203	31	26	5	1	6	172	0	203	6	2.96
2015 Totals	2059	0	55	88	1916	576	511	82	7	89	1368	82	1944	171	8.80
2014 Totals	3246	0	26	178	3042	1248	805	444	14	458	1794	25	3043	483	15.87
2013 Results	2771		150		2621								2942	387	13.15

2015 ETC Lifeline Re-Certification Results
Wireline Direct Contact Only Companies

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility data base or USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M=(F+K)	N N=(J+L)	O O=((N/M)*100)
Ace Telephone Association 361346	189	0	1	8	180	180	155	25	1	26	0	0	180	26	14.44
Alliance ETC- (Hills)	19	0	1	3	15	15	13	2	1	3	0	0	15	3	20.00
American Broadband and Telecommunications	163	0	42	15	106	106	18	88	0	88	0	0	106	88	83.02
City of Barnesville Municipal Telephone	42	0	0	0	42	42	42	0	0	0	0	0	42	0	0.00
Benton Coop Tel Co	61	0	3	3	55	55	45	10	0	10	0	0	55	10	18.18
CenturyLink															
(1) CenturyLink-Chester	3	0	0	0	3	3	1	2	0	2	0	0	3	2	66.67
(2) CenturyLink-Embarq	764	0	20	26	718	718	530	188	0	188	0	0	718	188	26.18
(3) CenturyLink-MN	340	0	9	8	323	323	232	91	0	91	0	0	323	91	28.17
(4) CenturyLink-QC	11145	162	335	438	10210	10210	7377	2833	0	2833	0	0	10210	2833	27.75
Christensen Communications Company	17	1	0	0	16	16	14	2	0	2	0	0	16	2	12.50
Crosslake Telephone Company	18	0	0	3	15	15	14	1	1	2	0	0	15	2	13.33
Dunnell Tel Co, Inc.	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
Emily Cooperative Tel	36	0	0	0	36	36	29	7	0	7	0	0	36	7	19.44
Hanson Communications, Inc.															
(1) Clara City Telephone Co	37	0	0	0	37	37	34	3	0	3	0	0	37	3	8.11
(2) Sacred Heart Telephone Co	12	0	0	0	12	12	8	4	0	4	0	0	12	4	33.33
(3) Starbuck Telephone Co	58	0	0	0	58	58	42	16	0	16	0	0	58	16	27.59
(4) Zumbrota Telepoone Co	27	0	0	0	27	27	22	5	0	5	0	0	27	5	18.52
Harmony Telephone Company (MSG Tel, Inc.- holding company)	34	0	3	3	28	28	28	0	2	2	0	0	28	2	7.14
Interstate Telecommunications	47	0	0	0	47	47	46	1	0	1	0	0	47	1	2.13
Johnson Telephone Company	118	0	7	10	101	101	91	10	0	10	0	0	101	10	9.90
Kasson & Mantorville Tel Co	47	0	10	14	23	23	23	0	2	2	0	0	23	2	8.70
Larson Utilities, Inc.															
(1) Minnesota Valley Telephone Company	9	0	0	0	9	9	9	0	0	0	0	0	9	0	0.00
(2) Winthrop Telephone Company	6	0	1	0	5	5	5	0	0	0	0	0	5	0	0.00
Lismore Coop Tel Co	4	0	0	1	3	3	3	0	0	0	0	0	3	0	0.00
Mabel Coop Tel Co	22	0	0	0	22	22	21	1	1	2	0	0	22	2	9.09
Manchester-Hartland Telephone Co.	9	0	0	0	9	9	8	1	0	1	0	0	9	1	11.11
N-U Telecom, Inc.															
(1) Hutchinson Telephone Company	102	0	0	0	102	102	86	16	3	19	0	0	102	19	18.63
(2) New Ulm Telecom, Inc.	190	0	2	0	188	188	112	38	9	47	0	0	188	47	25.00
(3) Sleepy Eye Telephone Company	43	0	3	0	40	40	26	14	0	14	0	0	40	14	35.00
(4) Western Telephone Company	45	0	1	0	44	44	38	6	2	8	0	0	44	8	18.18
New Ulm Telecom, Inc. - see NU Telecom, Inc.															
Northern Tel Co (affiliate of Wilderness Valley)	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00

2015 ETC Lifeline Re-Certification Results
Wireline Direct Contact Only Companies

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility data base or USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M=(F+K)	N N=(J+L)	O O=((N/M)*100)
Park Region Tel Co (affiliate of Valley Tel Co) (1)	25	0	3	0	22	22	21	1	2	3	0	0	22	3	13.64
Paul Bunyan Rural Tel Co	306	0	0	34	272	272	233	39	9	48	0	0	272	48	17.65
PolarTel															
(1) Polar Telecommunications Inc. 381614	46	0	0	2	44	44	31	13	1	14	0	0	44	14	31.82
(2) Polar Communications Mutual Aid Corp. 381630	149	0	1	8	140	140	109	31	0	31	0	0	140	31	22.14
(3) Wolverton Telephone Co. 361512	1	0	0	0	1	1	1	0	0	0	0	0	1	0	0.00
Red River Rural Telephone Assoc.	12	0	0	0	12	12	8	4	0	4	0	0	12	4	33.33
Rothsay Telephone Co.	10	0	1	0	9	9	9	0	0	0	0	0	9	0	0.00
Scott Rice Tel Co dba Integra Telecom (Integra Telecom Holding Inc.)	78	0	2	0	76	76	74	2	0	2	0	0	76	2	2.63
Spring Grove Comm	54	0	0	6	48	48	44	4	1	5	0	0	48	5	10.42
TDS Telecommunications Corporation															
(1) Arvig Telephone Company	213	0	7	20	186	186	145	41	0	41	0	0	186	41	22.04
(2) Bridgewater Telephone Co	58	0	2	4	52	52	47	5	0	5	0	0	52	5	9.62
(3) KMP d/b/a Mid-State Tel Co.	4	0	0	4	0	0	0	0	0	0	0	0	0	0	#DIV/0!
(4) Mid-State Telephone Company	115	0	2	6	107	107	88	19	0	19	0	0	107	19	17.76
(5) Winsted Telephone Company	21	0	0	3	18	18	14	4	0	4	0	0	18	4	22.22
Upsala Coop Tel Assn	36	0	0	4	32	32	26	6	0	6	0	0	32	6	18.75
Valley Tel Co (Affiliate of Park Region Tel Co)(1)	8	0	3	0	5	5	3	2	1	3	0	0	5	3	60.00
West Central Tel Assn.	77	0	1	9	67	67	58	9	6	15	0	0	67	15	22.39
Wilderness Valley Tel Co (affiliate of Northern Tel Co)	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
Windstream Communications															
(1) Windstream Communications LLC-361414	157	0	5	38	114	114	110	4	0	4	0	0	114	4	3.51
(2) Windstream Communications LLC-361482	62	0	5	5	52	52	33	19	0	19	0	0	52	19	36.54
Woodstock Tel Co	30	0	1	6	23	23	23	0	1	1	0	0	23	1	4.35
					0			0		0			0	0	#DIV/0!
2015 Totals	15075	163	471	681	13760	13760	10155	3567	43	3610	0	0	13760	3610	26.24
								25.9%		26.2%		#DIV/0!			
2014 Totals	18091	190	466	831	16604	16576	12064	4512	36	4548	32	21	16608	4569	27.51
2013 Results						17427				4965					28.49%
2012 Results						70615				30599		14.8%			43.33%
(1) Database check by Solix								42.7%		43.3%					

2015 ETC Lifeline Re-Certification Results

Wireless Companies

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base	# of subscribers de-enrolled by state, eligibility data base	# of subscribers attempted to recertify directly, or by state, data base	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
Blue Jay Wireless LLC	1627	0	2	1213	412	282	40	242	0	242	130	0	412	242	58.74
Boomerang Wireless, LLC d/b/a enTouch Wireless	2572	0	12	776	1784	1784	1025	759	0	759	0	0	1784	759	42.54
Budget PrePay Inc.	2811	0	550	862	1399	1339	1127	212	0	212	60	0	1399	212	15.15
Global Connection Inc of America	1	0	1	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
I-Wireless LLC	12621	0	1544	6790	4287	4287	2444	1843	5	1848	0	0	4287	1848	43.11
Nexus Communications, Inc. dba Reachout Wireless	17	0	6	2	9	9	7	2	0	2	0	0	9	2	22.22
Q Link Wireless LLC (Quadrant Holdings Group LLC)	9338	0	1071	1395	6872	6350	6306	44	3	47	522	0	6872	47	0.68
T-Mobile Central LLC	187	0	22	125	40	40	27	13	0	13	0	0	40	13	32.50
TAG Mobile LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Telrite Corporation d/b/a Life Wireless	21693	0	1856	9686	10151	6244	3871	2373	32	2405	3907	0	10151	2405	23.69
Tempo Telecom LLC (subsidiary of Birch Equity Partners)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
TerraCom, Inc.	764	0	8	340	416	47	47	0	2	2	369	109	416	111	26.68
Total Call Mobile Inc. (subsidiary of KDDI America, Inc.)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Virgin Mobile USA, LP	17017	0	1077	3314	12626	12978	11898	1080	139	1219	0	0	12978	1219	9.39
2015 Totals	68648	0	6149	24503	37996	33360	26792	6568	181	6749	4988	109	38348	6858	17.88
2014 Totals	75852	0	8253	26580	41019	40803	25086	15717	601	16318	1731	4	42534	16322	38.37
2013 Results	40219	0	1535	18442	20242	20269	17351	2918	369	3287	0	0	20269	3287	16.22
								20.5%		22.1%		37.7%			

2015 ETC Lifeline Re-Certification Results
Wireline & Wireless Database & Direct Contact Companies

ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base	# of subscribers de-enrolled by state, eligibility data base	# of subscribers attempted to recertify directly, or by state, data base M= (F+K)	# of subscribers de- enrolled by non-response or ineligibility N=(J+L)	Percent of Subscribers de- enrolled O=((N/M)*100)
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M	N	O
CenturyLink															
CenturyLink-NW Wisc	227	0	2	21	204	54	34	20	0	20	150	0	204	20	9.80
Consolidated Communications, Inc.															
(1) Mankato Citizens Tel Co	471	0	35	3	433	263	247	16	0	16	170	52	433	68	15.70
(2) Mid-Communications, Inc.	158	0	12	0	146	85	82	3	0	3	61	21	146	24	16.44
Consolidated Tel Co	153	0	1	12	140	18	12	6	0	6	122	0	140	6	4.29
(1) C-I Communications	39	0	0	2	37	9	6	3	0	3	28	0	37	3	8.11
Farmers-Federated															
(1) Farmers Mutual Tel (361389)	25	0	0	1	24	10	8	2	1	3	14	0	24	3	12.50
(2) Farmers Mutual Telephone Company (369020)	7	0	1	0	6	0	0	0	0	0	6	0	6	0	0.00
(3) FederatedTelephone Coop (369021)	52	0	0	1	51	17	15	2	1	3	34	0	51	3	5.88
Garden Valley Tel Co	265	0	0	23	242	23	16	7	4	11	242	0	265	11	4.15
Gardonville Coop Tel Assn	50	0	0	0	50	0	0	0	0	0	55	9	55	9	16.36
Lonsdale Tel	19	0	2	0	17	0	17	0	0	0	17	0	17	0	0.00
Rural Communications Holding Corporation															
(1) Blue Earth Valley Telephone Co	218	0	0	12	206	35	24	11	0	11	171	0	206	11	5.34
(2) Cannon Valley Telecom, Inc.	49	0	0	1	48	7	4	3	0	3	41	0	48	3	6.25
(3) Easton Telephone Company	23	0	0	0	23	3	1	2	0	2	20	0	23	2	8.70
(4) Eckles Telephone company	49	0	0	1	48	15	14	1	0	1	33	0	48	1	2.08
(5) Granada Telephone Company	4	0	0	0	4	1	1	0	0	0	3	0	4	0	0.00
(6) Pine Island Telephone Company	36	0	0	2	34	5	4	1	0	1	29	0	34	1	2.94
Wikstrom Telephone Co., Inc.	214	0	2	9	203	31	26	5	1	6	172	0	203	6	2.96
2015 Wireline Totals	2059	0	55	88	1916	576	511	82	7	89	1368	82	1944	171	8.80
Blue Jay Wireless LLC	1627	0	2	1213	412	282	40	242	0	242	130	0	412	242	58.74
Budget PrePay Inc.	2811	0	550	862	1399	1339	1127	212	0	212	60	0	1399	212	15.15
Q Link Wireless LLC (Quadrant Holdings Group LLC)	9338	0	1071	1395	6872	6350	6306	44	3	47	522	0	6872	47	0.68
Telrite Corporation d/b/a Life Wireless	21693	0	1856	9686	10151	6244	3871	2373	32	2405	3907	0	10151	2405	23.69
TerraCom, Inc.	764	0	8	340	416	47	47	0	2	2	369	109	416	111	26.68
2015 Wireless Totals	36233	0	3487	13496	19250	14262	11391	2871	37	2908	4988	109	19250	3017	15.67
2015 Total Wireline & Wireless	38292	0	3542	13584	21166	14838	11902	2953	44	2997	6356	191	21194	3188	15.04

2015 ETC Lifeline Re-Certification Results
Wireline & Wireless Database & Direct Contact Companies

ETC

FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de- enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibilty data base	# of subscribers de-enrolled by state, eligibilty data base	# of subscribers attempted to recertify directly, or by state, data base M M= (F+K)	# of subscribers de- enrolled by non-response or ineligibility N N=(J+L)	Percent of Subscribers de- enrolled O O=((N/M)*100)
A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M	N	O