

November 16, 2018

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

RE: **Petition of Federated Telephone Cooperative for Designation as an Eligible
Telecommunications Carrier (ETC)**
Docket No: P523/AM-18-630

Dear Mr. Wolf:

Attached are comments of the Department of Commerce concerning the Petition of Federated Telephone Cooperative (Federated) for Designation as an Eligible Telecommunications Carrier (ETC). This petition is partially in response to Federated's winning bid in the Connect America Fund Auction (CAF II).

The petition was filed on October 3, 2018 by:
Thomas G. Burns
Olsen Thielen and Co.
2675 Long Lake Road
St. Paul, MN 55113-1117

On behalf of:
Kevin Beyer
General Manager
Federated Telephone Cooperative
405 2nd St. E.
Chokio, MN 56221

The Department recommends that the Commission grant Federated ETC status for high cost support in the designated census blocks for which the company will receive CAF II funds.

Sincerely,

/s/ JOY GULLIKSON
Rate Analyst

JG/jl
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Petition of Federated Telephone Cooperative for Designation as an Eligible Telecommunications Carrier (ETC)

Docket No: P523/AM-18-630

I. ISSUE

Whether the Minnesota Public Utilities Commission (Commission) should grant the petition of Federated Telephone Cooperative (Federated) for Lifeline only ETC status in the areas in which it has CLEC authority and for high cost support ETC status in the census blocks for which Federated will receive Connect America Funds II (CAFII) funding.

II. PROCEDURAL HISTORY

As an incumbent local service provider, Federated became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent telephone company.¹ In 2010, under Docket No. P523, P5750/PA-10-1212, Federated expanded its service area and received CLEC authority for the exchanges of Morris and Appleton. Through Docket P532/AM-12-119, Federated received ETC status for its exchange in Morris, where Federated received Experimental Broadband Support in a number of Census Blocks.

Under Docket No. P532/AM-14-678, Federated filed for and received CLEC authority in the exchange of Graceville. Through Docket No. P532/AM-15-261, Federated received CLEC authority in Beardsley, Clinton, and Ortonville-Big Stone. In 2016, Federated received CLEC authority in the exchanges of Benson, Murdock, Kerkhoven, Pennock, and Sunburg, through Docket No. P532/AM-15-1074.

By public notice from the FCC on August 28, 2018, Federated was named a winning bidder in the CAF II auction, to receive \$1,431,038.80 by serving 808 locations. The CAF II award is given in monthly installments for 10 years (about \$14.76 per location per month for Federated), as long as Federated meets certain build out requirements. The 808 locations are in the census blocks within the Graceville, Beardsley, Clinton, Ortonville-Big Stone, and Benson exchange areas, identified in dark pink on Exhibit 1. The census blocks are also listed on Exhibit 1.

In order to receive the CAF II support, Federated, along with all other recipients, must certify to the FCC and USAC that it has received designation as an ETC eligible for high cost funding no later than February 25, 2019.

¹ Minn. Rules 7812.1400, subp.1.

Additional requirements for CAF II support recipients include:

- Offer commercially at least one voice and one broadband service meeting the relevant service requirements to the required number of locations in the following timeframe:
 - 40% of the required number of locations in a state by the end of third year of support
 - An additional 20% in each subsequent year
 - 100% by the end of the sixth year of support
 - The exact deployment schedule is determined by the carriers themselves, not the FCC.
 - File with USAC annual reports and build-out milestone certifications, as well as data on the locations where service is available. Failure to meet the terms and conditions of support can result in increased reporting obligations and possible withholding and/or recovery of support.
 - Offer at least one broadband and voice service at rates that are reasonably comparable to the rates for similar service in urban areas. The FCC uses its annual Urban Rate Survey to determine the range of rates that are reasonably comparable².

The FCC named fifteen companies as CAF II winners for Minnesota locations. They are:

Company	Amount	Locations	Ave/Loc.	Ave/Loc/10 years/month
Broadband Corporation	428,117	128	3,344.66	\$27.872
Consolidated Telephone	934,933.80	358	2,611.55	21.763
Farmers Mutual	348,991.60	163	2,141.05	17.842
Federated Coop	1,431,038.80	808	1,771.09	14.759
Garden Valley	880,346	95	9,266.80	77.223
Halstad Telephone	19,635.20	7	2,805.03	23.38
Interstate Telephone	552,329.60	209	2,642.73	22.02
Jaguar	510,587.60	672	759.80	6.33
Johnson Telephone	81,272.50	47	1,729.20	14.41
LTD Broadband	1,104,440.80	840	1,314.81	10.957
Midcontinent	27,977,283.80	7410	3,775.61	31.463
Paul Bunyan	1,313,542.60	315	4,169.98	34.75
Roseau Electric	2,081,769.70	326	6,385.80	53.215
West Central Telephone	611,934.40	532	1,150.25	9.585
Wikstrom	532,556.80	56	634	79.25
TOTALS	38,808,780.20	12,750	44,502.35	
<i>AVERAGES</i>	<i>2,587,252.01</i>	<i>850</i>	<i>2,966.83</i>	24.724

² From <https://www.fcc.gov/auction/903>.

III. LEGAL STANDARDS

The Code of Federal Regulations Part 54 governs the federal requirements for common carriers becoming ETCs. Federal Communications Commission (FCC) orders have adjusted some of these regulations over the years. Most of the adjustments have been to reduce reporting requirements. Parts relevant to this petition include:

§ 54.101 (b) requires “an eligible telecommunications carrier must offer voice telephony as set forth in paragraph (a) of this section in order to receive federal universal service support.” Part (a) requires voice grade access to the public switched network or its functional equivalent.

§ 54.201 states in parts (d), (e), and (h): “A common carrier designated as an ETC under this section shall be eligible to receive universal service support in accordance with section 254 of the Act and shall, throughout the service area for which the designation is received:

(1) Offer the services that are supported by federal universal service support mechanisms under subpart B of this part and section 254(c) of the Act, either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier); and

(2) Advertise the availability of such services and the charges therefore using media of general distribution.

(e) For the purposes of this section, the term facilities means any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part.

(f) For the purposes of this section, the term “own facilities” includes, but is not limited to, facilities obtained as unbundled network elements pursuant to part 51 of this chapter, provided that such facilities meet the definition of the term “facilities” under this subpart.

(h) A state commission shall not designate a common carrier as an eligible telecommunications carrier for purposes of receiving support only under subpart E [Lifeline] of this part unless the carrier seeking such designation has demonstrated that it is financially and technically capable of providing the supported Lifeline service in compliance with subpart E of this part.

§ 54.203 states in part: “If no common carrier will provide the services that are supported by federal universal service support mechanisms under section 254(c) of the Act and subpart B of this part to an unserved community or any portion thereof that requests such service, the Commission, with respect to interstate services, or a state commission, with respect to intrastate services, shall determine which common carrier or carriers are best able to provide such service to the requesting unserved community or portion thereof and shall order such carrier or carriers to provide such service for that unserved community or portion thereof.”

Minnesota Rules 7811.1400 and 7812.1400, subp. 13 state: “The commission may order an LSP³ to provide the services that are supported by a federal universal service support mechanism to an otherwise unserved area only as provided in section 102(a) of the act and consistent with Minnesota Statutes, sections 237.081 and 237.16.”

Minn. Rule 7812.0600 subp. 4 and 7811.0600, subp. 4 state: “An LSP designated an ETC by the commission must provide local service, including, if necessary, facilities-based service, to all requesting customers within the carrier's service area on a nondiscriminatory basis, regardless of a customer's proximity to the carrier's facilities. An LSP may assess special construction charges approved by the commission if existing facilities are not available to serve the customer.”

Also, in Docket P999/M-05-1169, *Order Adopting FCC Requirements for Designating Eligible Telecommunications Carriers, As Modified*, the Commission ordered:

“After the date of this Order, petitioners to the Commission to be designated an eligible telecommunications carrier under 47 U.S.C. 214(e)(2) must

- (1) (A) Commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. Each applicant shall certify that it (1) provide service on a timely basis to requesting customers within the applicant's service area where the applicant's network already passes the potential customer's premises; and (2) provide service within a reasonable period of time, if the potential customer is with the applicant's licensed service are[a] but outside its existing network coverage, if service can be provided at reasonable cost by (a) modifying or replacing the requesting customer's equipment; (b) deploying a roof-mounted antenna or other equipment; (c) adjusting the nearest cell tower; (d) adjusting network or customer facilities; (e) reselling services from another carrier's facilitates to provide service; or (f) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment”

³ Local Service Provider

In setting the requirements for this round of auction to receive the CAF II funding, the FCC required:

“Each Connect America Fund support recipient must offer voice as a standalone service, but may separately bundle its broadband offerings with a voice service.”⁴

Congress, in 47 USC § 214 (e), requires as a precondition to assessing FCC high cost or Lifeline support subsidies, that providers be designated Eligible Telecommunication Carriers by a state commission. Telecommunications carriers are defined by 47 USC § 153 (51) as “any provider of telecommunications services [and a] telecommunications carrier shall be treated as a common carrier . . . only to the extent that it is engaged in telecommunications services.”

The regulatory status of VOIP service is currently in litigation. The Minnesota Commission found that fixed⁵ VOIP services are subject to applicable consumer protections for telecommunications service under Minnesota statutes, as there has been no federal preemption of the Commission’s authority.⁶ Although the FCC has not classified fixed or over-the-top VoIP as being either an information service or a telecommunications service, in a 2-1 split decision, the Eighth Circuit Court of Appeals found that all VoIP service is an information service.⁷ The Minnesota Commission has requested an en banc rehearing of the Eighth Circuit decision. It is the understanding of the Department that the Eighth Circuit’s decision is not effective until they rule on the request for rehearing en banc, or during the pendency of the request if they grant it.

IV. ANALYSIS

Federated plans to offer service to its new ETC customers in a similar manner to its provision of service to customers in its incumbent area. Federated’s application and follow up discussions assert that Federated wishes to expand its ETC status under the same standards that it filed for ETC authority through Docket No. P523/AM-12-119. Its petition to the Commission at that time was thorough. Of particular note:

1. As noted above, Federated received authority to operate in the CLEC areas in Exhibit 1 in between 2010 and 2016.

⁴ USF/ICC Transformation Order, 26 FCC Rcd at 17693, para. 80.

⁵ The term “fixed” represents those services at a stationary location, as opposed to “over-the-top” or “bring your own broadband” VoIP services that may be used from any location that the customer has access to the internet. Over-the-top VoIP is also referred to as “nomadic VoIP.”

⁶ See. *In the Matter of the Complaint of the Minnesota Department of Commerce Against the Charter Affiliates Regarding Transfer of Customers*, Order Finding Jurisdiction and Requiring Compliance Filing, Docket No. P6716,5615/C-14-383. July 28, 2015.

⁷ *Opinion*, 2018 WL 4260322 (8th Cir September 7, 2018)

2. Federated's Facilities and Commitment to Serve - Federated stated in 2012 that it will provide broadband and voice telephone over its copper (and now mostly fiber-optic) facilities. In response to the Commission's order in Docket P999/M-05-1169 Federated certified that it will:
 - (a) provide service on a timely basis to requesting customers within the service area where Federated's network already passes the potential customer's premises; and
 - (b) provide service within a reasonable period of time, if the potential customer is within the service area but not passed by Federated's current network facilities, if service can be provided at reasonable cost by constructing network facilities.

3. Federated's Basic Universal Service Offering – In its 2012 filing, Federated agreed to provide voice telephony in the service area at rates that are reasonably comparable to the rates for similar service in urban areas. Federated has provided no updated information regarding the comparability to similar services. However, below shows comparable rates filed in 2012:

Service	Century Link		Federated	
	Installation	Monthly	Installation	Monthly
Residence Service	\$40.00	\$14.40	\$18.35	\$14.96
Business Service	\$40.00	\$47.90	\$47.90	\$34.61

4. Federated's Advertising Plan - Federated stated in its filing that it meets and will meet the advertising requirements by advertising its services through several different channels of general distribution, including newspaper and direct mail. Federated plans to advertise the availability of its Lifeline universal service offering through the same advertising channels it currently employs. In addition, the availability of the offering throughout the service area will be listed continuously on Federated's web site: <http://www.aciracoop.net>. The service offering will also be published at least annually in the local newspaper, and will be posted at the Federated office in Chokio, MN.

5. Federated's Ability to Remain Functional in Emergency Situations. Federated stated in its 2012 filing that its network can and will remain functional in emergencies. The central office serving Federated's customers is equipped with electrical generators and battery power supply to provide service in the event of a commercial power outage. The interoffice facilities serving the service area are on a diverse routed fiber optic ring, which if cut will be automatically rerouted. Federated complies with the Commission's Rules in Chapter 7810 establishing minimum standards on various operational matters, such as 7810.3900 (Emergency Operations); 7810.4900 (Adequacy of Service); and 7810.5300 (Dial Service Requirements).

6. Federated's Satisfaction of Consumer Protection and Service Quality Standards –Federated is subject to and complies with the Commission's Rules pertaining to service quality and consumer protection. Federated's tariff has specific provisions outlining the following terms addressing consumer protection issues:
 - Deposit and guarantee requirements
 - Customer Billing
 - Appropriate handling of customer complaints and billing disputes
 - Disconnection and notice requirements

7. Requirement to provide telecommunications services. Congress, in 47 U.S.C. § 214 (e), required as a precondition to accessing FCC high cost or consumer specific "lifeline" support subsidies, that providers be designated "Eligible Telecommunications Carriers" (ETCs) by a State commission.⁸ As explained by the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Utility Consumer Advocates (NASUCA) in their September 28, 2108 Amicus Brief to the United States Court of Appeals for the Eighth Circuit, "State commissions across the country have certified numerous ETCs based on their provision of I-VoIP as a telecommunications service. Neither the FCC nor any State Commission can ignore the Congressional restrictions and certify carriers that only provide information services."⁹ To do otherwise would be defrauding the USF fund. Thus, in order to be granted ETC status, ITC must offer a stand-alone voice telecommunications service. The ETC petitions filed as a result of the CAF II auction, including the petition by Federated, are likely to use IP technology for the voice service offering. As stated earlier, the Minnesota Commission has requested an en banc rehearing of the Eighth Circuit decision and it is the understanding of the Department of Commerce that the Eighth Circuit's decision is not effective until it rules on the request for rehearing en banc, or during the pendency of the request if they grant it. Thus, at this time, fixed VOIP service is a telecommunications service under Minnesota law, as this Commission has determined, and satisfies the legal requirement.

In summary, Federated has been operating successfully for a number of years as a CLEC and many more years as an incumbent. This history comports with the requirement of 47 CFR §

⁸ "Telecommunications carriers" are defined as "any provider of telecommunications services [and a] telecommunications carrier shall be treated as a common carrier under this chapter only to the extent that it is engaged in providing telecommunications services." 47 U.S.C. § 153 (51). (emphasis added). The federal universal service fund program is "under this chapter" in 47 U.S.C. § 254 (51).

⁹ See Motion Seeking Leave to File Brief of Amici Curiae The National Association of Regulatory Utility Commissioners and The National Association of State Consumer Advocates Supporting Defendant-Appellants Petition for Rehearing En Banc, Appeal from the U.S. District Court for the District of Minnesota, No.15-cv-3925, at page 5.

54.201 (h) that the carrier demonstrate it is financially and technically capable of providing the supported Lifeline service.

V. COMMISSION OPTIONS

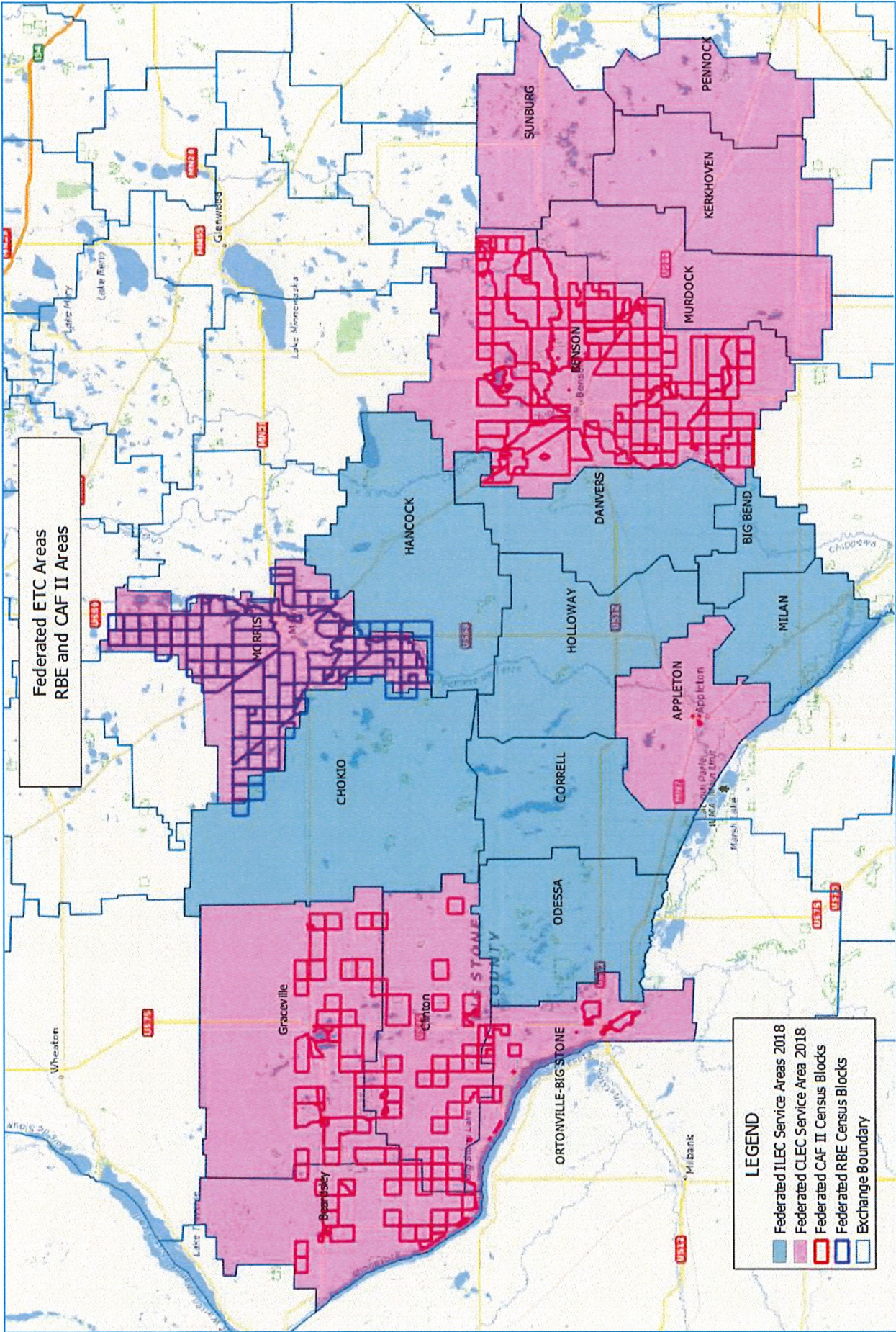
The Commission may choose to:

- A. Approve Federated's request for Lifeline ETC status in all areas in which Federated has CLEC authority but has not yet received ETC status and additionally approve Federated request for high cost ETC status in the census blocks listed in Exhibit 1.
- B. Deny Federated's petition for ETC status in the areas in which Federated has CLEC authority.
- C. Take other action, as the Commission deems appropriate.

VI. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission order option A: Approve Federated's request for Lifeline ETC status in all areas in which Federated has CLEC authority but has not yet received ETC status and additionally approve Federated request for high cost ETC status in the census blocks listed in Exhibit 1.

/jl
Attachment



Federated ETC Areas
RBE and CAF II Areas

LEGEND

- Federated ILEC Service Areas 2018
- Federated CLEC Service Area 2018
- Federated CAF II Census Blocks
- Federated RBE Census Blocks
- Exchange Boundary

CAF II Census Blocks

Census Block	Exchange		
271519603001165	Benson	271519601001009	Benson
270119502001205	Ortonville	271519603002104	Benson
270119502001144	Clinton	270119501001201	Clinton
270119502001144	Graceville	271519603002078	Benson
271519603001168	Benson	270119502001016	Beardsley
270119502001127	Graceville	271519603002061	Benson
270119502001127	Beardsley	270119501001047	Graceville
271519603002093	Benson	271519601002046	Benson
271519601001169	Benson	271519601002065	Benson
271519603002096	Benson	270119502001091	Beardsley
271519603001485	Benson	271519603001427	Benson
271519603002006	Benson	271519601002068	Benson
270119502001167	Clinton	270119501001068	Clinton
270119502001167	Beardsley	271519603001371	Benson
271519603001171	Benson	271519603002101	Benson
271519603001104	Benson	271519603002109	Benson
271519603002099	Benson	270119502001172	Clinton
270119502001104	Beardsley	270119502001073	Beardsley
271519603002100	Benson	270119502001218	Clinton
270119502001141	Beardsley	270119503001070	Ortonville
270119501001055	Graceville	270119502001152	Clinton
271519603002001	Benson	270119502001129	Clinton
270119501001041	Graceville	270119502001129	Graceville
270119502001171	Clinton	270119502001129	Beardsley
271519603001071	Benson	270119503001066	Ortonville
270119502001100	Beardsley	271519603001418	Benson
270119502001184	Clinton	270119501001046	Graceville
271519603001251	Benson	271519601001107	Benson
271519603002011	Benson	271519603002014	Benson
270119501001150	Clinton	270119502001201	Beardsley
271519602002000	Benson	270119503001039	Ortonville
271519603001367	Benson	271519603001092	Benson
271519603001162	Benson	271519603001032	Benson
271519603001404	Benson	271519601001033	Benson
271519603001403	Benson	271519601001162	Benson
271519603001103	Benson	270119502001021	Beardsley
271519603001246	Benson	270119502002008	Graceville
271519603001249	Benson	270119502001024	Beardsley
270119502001160	Clinton	271519603001381	Benson
271519603002108	Benson	270119502001133	Graceville
271519603001426	Benson	270119501001007	Graceville
270119502002024	Graceville	271519601001108	Benson
271519601001109	Benson	270119502001004	Graceville
271519603002092	Benson	271519601002081	Benson
270119501001006	Graceville	271519601001022	Benson
		271519601002052	Benson

271519601001008	Benson	271519603001389	Benson
270119502001051	Beardsley	271519601002069	Benson
270119502002011	Graceville	271519603002075	Benson
270119502002120	Graceville	270119502001227	Ortonville
270119502002112	Graceville	270119502001227	Clinton
271519603001379	Benson	271519601001168	Benson
270119502001194	Clinton	270119502001170	Clinton
271519603001372	Benson	270119502002027	Graceville
270119502002129	Graceville	271519603001419	Benson
271519603002002	Benson	271519603001420	Benson
270119502002028	Graceville	271519604001208	Appleton
271519603002058	Benson	271519603001390	Benson
271519603001423	Benson	271519603001416	Benson
271519603001380	Benson	270119501001509	Clinton
270119502002020	Graceville	271519603001387	Benson
270119502001275	Ortonville	271519603002003	Benson
270119501001049	Clinton	271519603002044	Benson
270119501001049	Graceville	270119502001250	Ortonville
270119502001232	Ortonville	271519603002028	Benson
270119503001000	Ortonville	271519603002036	Benson
270119502002019	Graceville	270119502001059	Beardsley
270119501001147	Clinton	270119502001049	Beardsley
271519604001224	Appleton	271519603002107	Benson
270119501001028	Graceville	271519601001014	Benson
270119501001019	Graceville	270119502001034	Beardsley
270119501001027	Graceville	271519603002034	Benson
270119501001037	Graceville	271519601002078	Benson
270119501001036	Graceville	271519603001252	Benson
271519603001409	Benson	271519601001029	Benson
270119501001022	Graceville	271519601001038	Benson
270119502002066	Graceville	270119502002074	Graceville
270119502001183	Ortonville	271519603001377	Benson
270119502001183	Clinton	270119502002127	Graceville
270119502001183	Beardsley	270119502002006	Graceville
271519603001172	Benson	271519603001375	Benson
270119502001097	Beardsley	270119502001146	Graceville
271519603001406	Benson	271519603001070	Benson
271519603002019	Benson	270119503001071	Ortonville
271519603001063	Benson	271519603001033	Benson
271519603001407	Benson	271519603001388	Benson
271519603001430	Benson	271519603002106	Benson
270119502001003	Graceville	271519603001086	Benson
270119502001222	Ortonville	270119502001264	Ortonville
270119502001222	Clinton	270119502002009	Graceville
271519603001170	Benson	271519603001105	Benson
271519603001413	Benson	270119502002010	Graceville
271519604001199	Appleton	271519603002105	Benson
271519603001391	Benson	271519601001163	Benson

270119502001208	Ortonville	271519601001106	Benson
270119501001034	Graceville	270119502001234	Ortonville
271519603001429	Benson	270119502001009	Graceville
271519601001183	Benson	270119502001009	Beardsley
271519601002062	Benson	270119502001045	Beardsley
270119502001005	Graceville	271519601001042	Benson
270119502001005	Beardsley	270119502001224	Ortonville
270119503002004	Ortonville	270119502001224	Clinton
270119502001134	Clinton	271519603001417	Benson
270119502001134	Graceville	271519603001428	Benson
271519603001399	Benson	271519601001048	Benson
270119502001200	Beardsley	270119502001080	Beardsley
271519603001402	Benson	270119502001048	Beardsley
270119503001004	Ortonville	271519601002073	Benson
271519603001490	Benson	271519601002064	Benson
270119502001272	Beardsley	271519601002043	Benson
270119502001101	Beardsley	271519603002000	Benson
270119502001223	Ortonville	270119502001079	Beardsley
270119502001223	Clinton	271519603001432	Benson
271519603001493	Benson	270119502002126	Graceville
271519603001002	Benson	271519601001180	Benson
270119502001030	Beardsley	271519601001186	Benson
271519601002096	Benson	271519603002087	Benson
270119501001139	Clinton	270119501001054	Clinton
270119502001148	Clinton	270119501001054	Graceville
271519601001166	Benson	270119502001099	Beardsley
271519602003102	Benson	271519603001384	Benson
270119502001213	Ortonville	270119502001221	Ortonville
270119502001178	Clinton	270119502001221	Clinton
270119502001165	Clinton	271519601001037	Benson
270119502001165	Beardsley	270119502001273	Beardsley
270119502001176	Clinton	271519603001422	Benson
270119502001189	Clinton	271519603001410	Benson
271519603001431	Benson	271519601001040	Benson
271519603001159	Benson	270119502001038	Beardsley
271519603002026	Benson	270119502001025	Beardsley
271519603002027	Benson	271519603001169	Benson
271519603002025	Benson	271519603002079	Benson
271519603002030	Benson	271519601001018	Benson
270119501001168	Clinton	271519603002097	Benson
271519601001034	Benson	271519601002070	Benson
271519601002048	Benson	271519603002102	Benson
271519603002056	Benson	271519603001167	Benson
271519603002057	Benson	270119502001008	Graceville
271519601002214	Benson	270119502001008	Beardsley
271519603002021	Benson	271519601002084	Benson
270119502001031	Beardsley	270119502001150	Clinton
271519601001106	Murdock	270119502001220	Clinton

271519601001181 Benson
270119502002087 Graceville
271519603001365 Benson
271519603001408 Benson
271519603002017 Benson
271519603001494 Benson
271519603001491 Benson
271519603002031 Benson
271519601001044 Benson
270119502002023 Graceville
270119502002017 Graceville

270119502001179 Clinton
271519601002074 Benson
270119502001169 Beardsley
271519603001000 Benson
270119502002142 Graceville
270119502001271 Beardsley
270119502002144 Graceville
271519601002235 Benson
271519603001005 Benson
271519601002082 Benson

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. P523/AM-18-630

Dated this 16th day of November 2018

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_18-630_M-18-630
Thomas	Burns	tgburns@otcpas.com	OLSEN THIELEN & CO. LTD	2675 Long Lake Rd Saint Paul, MN 55113	Electronic Service	No	OFF_SL_18-630_M-18-630
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_18-630_M-18-630
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_18-630_M-18-630
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-630_M-18-630
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_18-630_M-18-630