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September 5, 2025

**Minnesota Public Utilities Commission**  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**RE: Docket PR-25-8, Comments on ETC Certification and Reporting Requirements**

Dear Commissioners,

On behalf of the Minnesota Telecom Alliance (MTA), I appreciate the opportunity to provide this letter regarding the ongoing review of Eligible Telecommunications Carrier (ETC) certification and associated reporting requirements.

**Lifeline Best Practices Reporting**

We believe the shift to biennial reporting of Lifeline best practices has been effective. This adjustment reflects a thoughtful balance between oversight and administrative efficiency, and we support its continued adoption.

**Performance Measure Testing (PM Testing)**

Last year MTA disputed the Department's assertion that PM Testing review supports the Commission's obligation to monitor ETC compliance. We continue to recommend against PM Testing review as part of this filing for the following reasons:

- **Irrelevance to Service Provision:** PM Testing does not pertain to the provision, maintenance, or upgrading of telephone services. As such, it should not factor into the Commission's determination of ETC compliance.
- **Federal Oversight:** The Universal Service Administrative Company (USAC), under FCC direction, is responsible for monitoring PM Testing. USAC has established procedures to address non-compliance, rendering state-level review duplicative.
- **Lack of Technical Expertise:** The Department does not possess the technical capacity to evaluate PM Testing results. Its role is limited to verifying compliance status, which can be accomplished through a simple statement from the ETC.

- **Minimal Non-Compliance:** According to Staff Briefing Papers, of the 98 ETCs under review, only 50 are required to submit PM Testing to USAC. Of those, just one was found out of compliance.
- **Incomplete Data Reliance:** The Department's reliance on optional quarterly reporting is problematic. As of today, USAC's website only reflects annual PM Testing data from 2022; 2023 results are not yet available.
- **Administrative Burden:** Continued PM Testing reporting creates unnecessarily busy work for both the Department and our members. We urge the Commission to reconsider this requirement in favor of a more streamlined approach.

### **Tribal Reporting Requirements**

MTA also asks the Commission to provide for annual tribal reporting , rather than continuing the current quarterly reporting. MTA believes annual reporting aligns with the FCC's intent and provides adequate oversight for ETC certification.

We appreciate the Commission's continued efforts to refine and improve the ETC certification process. MTA remains committed to supporting policies that ensure accountability while minimizing unnecessary administrative burdens.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Brent J. Christensen", with a long horizontal flourish extending to the right.

Brent J. Christensen  
President/CEO