

September 12, 2017

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

RE: Comments of the Minnesota Department of Commerce

Docket No. P999/M-17-20

Dear Mr. Wolf:

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

2016 Lifeline Re-certification Results

The Department recommends that the Minnesota Public Utilities Commission (Commission) accept the 2016 Lifeline re-certification filings.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ BRUCE L. LINSCHEID Financial Analyst

BLL/lt Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. P999/M-17-20

I. BACKGROUND

A. LIFELINE REFORM ORDER

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. Lifeline provides a monthly discount of \$9.25. 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). Link-Up provides a 100 percent reduction, up to \$100 off installation charges to qualifying residents of Tribal lands.

Prior to December 1, 2016, the following subscriber eligibility criteria applied to the TAP and Lifeline programs:⁴

- 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)
 - 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)⁵

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 47 U.S.C. §54.409(a) and (b).

⁵ *Id*.

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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 standards⁶

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, 2015, and 2016 in Docket Nos. 12-1315, 14-20, 15-20, and 16-20 requiring ETCs to submit the results of their annual Lifeline re-certification efforts. ETCs submit the results of their recertification efforts on FCC Form 555, and the Department reports the results of each year's survey.

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. For several years various Minnesota ETCs have used the Minnesota Department of Human Services (DHS) database to recertify Lifeline subscribers, avoiding the need to send a survey to those customers that are validated by the database. For those ETCs that use the Universal Service Administrative Company (USAC) to perform recertification via customer surveys, in 2016, for the first time, ETCs could use the Minnesota DHS database as well. 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. 8

For subscribers enrolled prior to January 1, 2017, recertification for 2016 will be conducted in accordance with current Lifeline practices and require recertification by December 31, 2016.⁹

⁶ *Id*.

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, Para. 7, Rel. April 1, 2016.

⁸ *Id*.

⁹ The Lifeline Modernization Order (FCC 16-38) released on April 27, 2016, Para. 418.

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B. LIFELINE MODERNIZATION ORDER

The Lifeline Modernization Order revised the Lifeline eligibility criteria. Effective December 1, 2016 or 60 days following PRA [Paperwork Reduction Act] approval, low-income households who qualify for and receive SNAP, Medicaid, Supplemental Security Income (SSI), Federal Public Housing Assistance (FPHA), or the Veterans Pension benefit will be eligible for enrollment in the Lifeline program. FCC rules were amended to remove Low-Income Home Energy Assistance Program (LIHEAP), national School Lunch Program's free lunch program (NSLP), and Temporary Assistance for Needy Families (TANF) from the default federal assistance liability for Lifeline. ¹⁰ Income-based eligibility and the Tribal eligibility criteria were not modified. ¹¹

For subscribers enrolled prior to January 1, 2017, rolling recertification began July 1, 2017. Beginning July 1, 2017, all subscribers enrolled prior to January 1, 2017 need to be recertified on a rolling basis based on the subscribers' service initiation date. Recertification was not required in 2017 for customers with anniversary dates during the transition period of January through June, 2017.

With the introduction of the rolling recertification process, ETCs that choose to use USAC for recertification will not use the Minnesota DHS database. USAC will use the National Lifeline Accountability Database (NLAD) to retrieve subscriber information, including anniversary dates, for use during the recertification process. USAC will recertify every subscriber listed in NLAD for the participating Service Area Code (SAC); no partial lists are permitted. 15

The revised recertification rule (47 CFR § 54.410(f)) clarifies that the entity responsible for recertifying subscribers must first query the appropriate state or federal data base to determine on-going eligibility prior to using other means to recertify subscribers. ¹⁶ If the subscriber's eligibility for Lifeline cannot be determined by accessing one or more databases containing information regarding enrollment in qualifying assistance programs, a signed certification form that meets the certification requirements may be obtained from the subscriber. ¹⁷

¹⁰ *Id.* Para. 167.

¹¹ Op. Cit. Fn. 9, Para. 167 and Para. 204.

¹² *Op. Cit.* Fn. 9, Para. 418.

¹³ *Id.* Fn. 1041

¹⁴ http://usac.org/li/program-requirements/recertify-subscribers/usac-elected.aspx

¹⁵ Id.

¹⁶ *Op. Cit.* Fn. 9, Para. 419.

¹⁷ 47CFR § 54.410(f)(2)(III) and (3)(III)

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II. STATEMENT OF ISSUES

What actions, if any, should the Commission take with respect to the Lifeline re-certification filings submitted by ETCs for 2016?

III. APPLICABLE LAW

47 C.F.R § 54.410(f) ("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-perhousehold re-certifications as required by § 54.410(f).

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 60 days of the date of the request will trigger deenrollment. If a subscriber does not respond to the carrier's notice of impending deenrollment, 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. Service providers must de-enroll a subscriber who has requested disenrollment within two business days

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 recertification efforts, performed pursuant to § 54.410(f), to the [Federal Communications] Commission and the Administrator. Eligible telecommunications

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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.

IV. ANALYSIS

A. YEARLY COMPARISON OF RE-CERTIFICATION DATA

The 2016 re-certification results were submitted by ETCs to comply with Paragraph 148 of FCC's Lifeline Reform Order and Section 47 C.F.R. 54.416(b) of the FCC's Rules. The 2012 – 2016 results are presented in the FCC Form 555 format submitted by ETCs and summarized below. The supporting data is provided in Attachment 1.

Subscribers	Subscribers	Responding	Non-	Ineligible	Subscribers	Subscribers	Subscribers	Total
to be	Contacted	Subscribers	responding	Subscribers	De-enrolled	reviewed by	De-enrolled	Subscribers
Re-certified	Directly		Subscribers	Contacted	Contacted	Data Base	by Data Base	De-enrolled
				Directly	Directly	or USAC	or USAC	
<u>(a)</u>	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			(d=b-c)	(%=e/b)	(f=d+e)		(%=h/g)	(i=f+h)
			(%=(d/a)		(%=(f/b)			(%i=(i/a)
				2016				
60174	43629	35216	8412	191	8603	16983	1110	9713
			19.3%	.44%	19.7%		6.5%	16.02%
				2015				
56354	47709	37469	10219	231	10450	9033	1061	11511
			21.4%	.5%	21.9%		11.7%	20.29%
				2014				
64509	58458	37818	20640	646	21286	7720	2413	23699
			35.3%	1.1%			31.3%	35.81%
				2013				
63302	39002	31018	7983	641	8624	4803	1811	10435
			20.5%	1.6%	22.1%		37.7%	16.48%
				2012				
72327	70615	30440	30140		30599	1712	253	30852
			42.7%		43.3%		14.8%	42.66%

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- (a). Number of subscribers subject to re-certification: All Lifeline subscribers must re-certify annually in accordance with Paragraph 130 of the Lifeline Reform 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 and increased to 60,174 in 2016 (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 19.7% in 2016 (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 to 20.3% in 2015 and 6.5% in 2016 (Column h and Attachment 1, Column L). ETCs were able to have USAC conduct Lifeline subscribers' surveys for the first time in 2013. ETCs that used a state database contracted with the Minnesota DHS. ETCs whose operations are primarily in neighboring states contracted with either Wisconsin Cares or the North Dakota Human Services System.
- (i). Overall de-enrollment rate: The total number of Lifeline subscribers de-enrolled declined from 30,852 or 42.66% of total Lifeline subscribers surveyed in 2012 to 9,725 or 16.02% of total Lifeline subscribers surveyed in 2016 (Column (i) and Attachment 1, Column O).
- B. WHAT OBSERVATIONS EMERGE FROM THE RESULTS OF THE 2016 RE-CERTIFICATION EFFORTS?
- 1. The 60,174 Lifeline subscribers required to be surveyed in 2016 increased from the 56,354 subscribers surveyed in 2015. (Attachment 1, Column E).
- The 2016 overall de-enrollment rate of 16.02% declined from 20.29% in 2015.
 (Attachment 1, Column O). The trend suggests that Lifeline subscribers who previously qualified for benefits are less likely to be de-enrolled in subsequent recertification efforts.
- 3. Non-response continues to be the largest factor in de-enrollment of Lifeline subscribers. For Lifeline subscribers surveyed directly by an ETC without the use of a state database, 8,412 or 19.28% of subscribers did not respond to the survey in 2016. This compares to 10,219 or 21.42% of Lifeline subscribers not responding to the survey being directly sent by ETCs in 2015. Only 191 or .44% of Lifeline of subscribers contacted directly by an ETC in 2016 were de-enrolled because they were ineligible or did not meet the qualifying requirements for Lifeline benefits. (Attachment 1, Columns H and I).

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- 4. The de-enrollment rate for ETCs that chose to use USAC to recertify their Lifeline subscribers was 31.76% in 2016, compared to 32.68% in 2015. (Attachment 2, Column O). The results presented in the FCC Form 555 format submitted by ETCs aggregates subscribers verified by USAC with subscribers verified by ETCs using the state database. When viewed separately, ETCs that used the state database have a much greater rate of recertification than the ETCs that chose to use USAC.
- 5. Combining a data base verification with direct contact of remaining (non-verified)
 Lifeline subscribers continues to produce the lowest percentage of Lifeline deenrollments. The de-enrollment rate for ETCs that chose to contact their Lifeline
 subscribers after first submitting them to a database for verification was 5.27% in 2016,
 compared to 8.80% in 2015 (Attachment 3, Column 0).
- 6. The de-enrollment rate for ETCs that directly contacted their Lifeline subscribers, but did not use a database, declined to 19.41% in 2016 from 26.24% in 2015 (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 43,863 of 60,174 (72.89%) of all Lifeline subscribers requiring recertification in 2016. This is approximately 5% higher than the 37,996 of 56,354 (67.42%) 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 deenrollments prior to recertification. Subscriber lines were stable with 69,149 in 2016, compared to 68,648 in 2015 (Attachment 5, Column A). The de-enrollment rate was 17.88% in 2015 and remained stable in 2016 at 17.59% (Attachment 5, Column O) suggesting better management of subscriber eligibility has been achieved after the 38.37% de-enrollment rate in 2014.

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. 16-20, as reflected on Attachment 1.
- 2. The number of Lifeline subscribers subject to recertification is somewhat stable, and the over-all de-enrollment rate is trending downward (Attachment 1, Columns E and O).

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<u>Year</u>	Subscribers to Recertify	<u>De-enrollment Rate/</u> <u>subscribers</u>
2012	72,327	42.66% 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
2016	60,174	16.02% or 9,713

^{*} see Section IV.B.7 of these comments

- 3. The 2016 de-enrollment rates for the various recertification procedures were:
 - a. USAC- 31.76% (Attachment 2, Column O)
 - b. DHS/state database verification then direct contact- 5.27% (Attachment 3, Column O).
 - c. Direct contact only 19.41% (excluding the Prepaid Wireless ETCs) (Attachment 4, Column O)
 - d. Prepaid Wireless ETCs 17.59% (Attachment 5, Column O).
- 4. Non-response by Lifeline subscribers continues to be the largest cause of deenrollments.
- 5. Re-certification through USAC continues to produce the highest rate of de-enrollments of Lifeline subscribers in 2016 (31.76%), although the de-enrollment rate declined from 32.68% in 2015 and 56.71% in 2014.
- 6. 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 deenrollment rate of 5.27% (see Attachment 3, Column O) by reducing the number of Lifeline subscribers needing to respond to a survey.(see Section IV.B.3 and B5 of these comments).
- 7. Companies that choose to use USAC for rolling recertification will not first perform verification with the state database. If past experience continues, companies will either choose USAC and experience a higher de-enrollment rate, or perform direct recertification with first using the state database and have a lower de-enrollment rate.
- 8. Prepaid wireless ETCs continue to have the majority of Lifeline subscribers subject to recertification (43,863) out of a total number of Lifeline subscribers subject to recertification of 60,174 or 72.89% in 2016 (Attachment 5, Column E/Attachment 1, Column E).

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V. COMMISSION ALTERNATIVES

- 1. Accept the Department's analysis regarding the ETC's 2016 Lifeline recertification surveys. All ETCs have complied with the requirement to submit their re-recertification results to the Commission, and the re-certification results comply with required recertification procedures.
- 2. Accept the Departments analysis regarding the ETC's 2016 Lifeline recertification surveys with modifications.
- 3. Reject the Departments analysis regarding the ETC's 2016 Lifeline recertification surveys.

VI. RECOMMENDATION

The Department recommends Alternative 1.

All ETCs must file their 2017 FCC Form 555 Lifeline survey results by January 31, 2018.

/lt

							Filed Data				-				
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 contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility 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
	Α	В	С	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
Ace Telephone Association 361346	169	0	4	6	159	159	128	31	0	31	0	0	159	31	19.50
Albany Mutual Telephone Association	59	0	18	1	40	0	0	0	0	0	40	24	40	24	60.00
Alliance ETC- (Hills)	18	0	0	4	14	14	13	1	0	1	0	0	14	1	7.14
American Broadband and Telecommunications Arrowhead Communications Corporation- see Arvig Enterprises, Inc. Arvig Enterprises, Inc.	250	0	33	99	118	118	56	62	0	62	0	0	118	62	52.54
(1) Arrowhead Communications Corporation	24	0	0	0	24	0	0	0	0	0	24	9	24	9	37.50
(2) Callaway Telephone Company, Inc.	11	0	1	0	10	0	0	0	0	0	10	4	10	4	40.00
(3) Cllements Telephone Co.	2	Ō	0	0	2	0	0	0	0	0	2	1	2	1	50.00
(4) Eagle Valley Telephone Company	28	0	0	1	27	0	0	0	0	0	27	9	27	9	33.33
(5) East Otter Tail Telephone Company	388	0	31	19	338	0	0	0	0	0	338	130	338	130	38.46
(6) Felton Telephone Company	6	0	0	0	6	0	0	0	0	0	6	2	6	2	33.33
(7) Home Telephone Company	18	0	0	0	18	0	0	0	0	0	18	4	18	4	22.22
(8) Loretel Systems Inc.	155	0	14	8	133	0	0	0	0	0	133	53	133	53	39.85
(9) Melrose Telephone Company	209	0	7	8	194	0	0	0	0	0	194	68	194	68	35.05
(10) Midwest Telephone Company	82	0	5	2	75	0	0	0	0	0	75	29	75	29	38.67
(11) Osakis Telephone Company	29	0	2	3	24	0	0	0	0	0	24	10	24	10	41.67
(12) The Peoples Telephone Co. of Bigfork	33	0	1	1	31	0	0	0	0	0	31	12	31	12	38.71
(13) Redwood County Telephone Company	42	0	2	2	38	0	0	0	0	0	38	10	38	10	26.32
(14) Tekstar Communications Inc.	442	0	19	25	398	0	0	0	0	0	398	150	398	150	37.69
(15) TwinValley-Ulen Telephone Company	134	0	5	4	125	0	0	0	0	0	125	49	125	49	39.20
Arvig Telephone Company- see TDS															
City of Barnesville Municipal	41	0	0	0	41	41	41	0	1	1	0	0	41	1	2.44
Telephone Benton Coop Tel Co Blue Earth Valley Telephone Company- see Rural Communications Holding	63	0	0	6	57	0	0	0	0	0	57	25	57	25	43.86
Corp Blue Jay Wireless LLC	4834	0	953	2311	1570	993	202	791	0	791	577	0	1570	791	50.38

					i		Filed Data			i	ı	i	ı		
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 contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility 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
	Α	В	Ċ	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
Boomerang Wirless, LLC d/b/a enTouch Wireless	3080	0	385	923	1772	1772	831	941	0	941	0	0	1772	941	53.10
Bridgewater Telephone Co- see TDS															
Budget PrePay Inc.	3259	0	565	942	1752	1570	1129	441	0	441	182	0	1752	441	25.17
C-I Communications- see Consolidated Telephone Company															
Callaway Telephone Company-see Arvig Enterprises, Inc.															
Cannon Valley Telecom, Inc see Rural Communications Holding Corp															
CenturyLink															
(1) CenturyLink-Chester	1	0 0	0 11	0	1 612	0	0 85	0	0	0 30	1	0	1 612	0	0.00
(2) CenturyLink-Embarq (3) CenturyLink-MN	634 340	0	9	11 8	323	115 323	232	30 91	0	91	497 0	0	323	30 91	4.90 28.17
(4) CenturyLink-NW Wisc	187	0	3	6	178	44	8	36	0	36	134	0	178	36	20.22
(5) CenturyLink-QC	9099	150	198	240	8511	1440	1105	335	0	335	7071	0	8511	335	3.94
Christensen Communications Company Crosslake Telephone Company- see Tri- Co Technologies LLC	18	0	0	1	17	17	17	0	1	1	0	0	17	1	5.88
Citizens Tel of Minnesota (361123)- see Frontier Communications															
Citizens Tel of Minnesota (367123)- see Frontier Communications															
Clara City Telephone Co- see Hanson Communications Clements Telephone Company- see Arvig Enterprises, Inc.															
Consolidated Communications, Inc.															
(1) Consolidated Communications of Minnesota	443	0	17	2	424	214	214	0	8	8	210	26	424	34	8.02
(2) Mid-Communications, Inc.	153	0	8	0	145	70	70	0	1	1	75	6	145	7	4.83
								_						_	
Consolidated Tel Co (1) C-I Communications	138 31	0 0	2 0	11 6	125 25	15 3	8	7 0	0 0	7 0	110 22	0 0	125 25	7 0	5.60 0.00
Crosslake Telephone Company- see Tri County Technologies LLC															
Dunnell Tel Co, Inc.	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
Eagle Valley Telephone Company- see Arvig Enterprises, Inc.															

							Filed Data			_					
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	enrolled prior to	# 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, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility 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
	Α	В	С	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)
East Otter Tail Telephone Company- see Arvig Enterprises, Inc.															
Easton Telepohone Company- see Rural Communications Holding Corp															
Eckles Telephone Company- see Rural Communications Holding Corp															
Emily Cooperative Tel Farmers-Federated	28	0	0	2	26	0	0	0	0	0	26	5	26	5	19.23
(1) Farmers Mutual Tel (361389)	24	0	1	0	23	4	4	0	0	0	19	0	23	0	0.00
(2) Farmers Mutual Technologies Inc. (369020)	10	0	0	1	9	1	1	0	0	0	8	0	9	0	0.00
(3) FederatedTelephone Coop (369021)	48	0	1	11	36	8	7	1	0	1	28	0	36	1	2.78
(4) Federated Telephone Coop(361403)	17	0	0	1	16	16	16	0	1	1	0	0	16	1	6.25
(5) Federated Telephone Cooperative (361390)	46	0	1	3	42	4	1	3	0	3	38	0	42	3	7.14
Felton Telephone Company- see Arvig Enterprises, Inc. Frontier Communications Corp. (1) Citizens Tel of Minnesota (361123)	738	0	43	37	658	0	0	0	0	0	658	147	658	147	22.34
(2) Citizens Tel of Minnesota	23	0	0	3	20	0	0	0	0	0	20	6	20	6	30.00
(367123) (3) Frontier Communications of MN	532	0	43	20	469	0	0	0	0	0	469	118	469	118	25.16
(361367) Garden Valley Tel Co	254	0	0	18	236	23	15	8	4	12	213	0	236	12	5.08
Gardonville Coop Tel Assn	46	0	0	0	46	8	8	0	0	0	38	0	46	0	0.00
Global Connection Inc of America	243	0	150	70	23	23	17	6	0	6	0	0	23	6	26.09
Granada Telephone Company- see Rural Communications Holding Corp															
Halstad Telephone Company Hanson Communications, Inc.	21	0	0	0	21	0	0	0	0	0	21	7	21	7	33.33
(1) Clara City Telephone Co	34	0	0	0	34	34	32	2	0	2	0	0	34	2	5.88
(2) Sacred Heart Telephone Co	8	0	0	0	8	8	6	2	0	2	0	0	8	2	25.00
(3) Starbuck Telepohone Co	60	0	0	0	60	60	52	8	0	8	0	0	60	8	13.33
(4) Zumbrota Telepoone Co	34	0	0	0	34	34	26	8	0	8	0	0	34	8	23.53
Harmony Telephone Company (MSG Tel, Inc holding company)	34	0	1	4	29	29	29	0	1	1	0	0	29	1	3.45
Home Telephone Company- see Arvig Enterprises, Inc. Hutchinson Telephone Company- see NU Telecom, Inc.															

							Filed Data								
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year		# 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, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility 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
	Α	В	С	D	E E=(A-B-C-D)	F	G	H H=(F-G)	1	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
I-Wireless LLC	8387	0	1049	3871	3467	3467	2297	1170	3	1173	0	0	3467	1173	33.83
Interstate Telecommunications Johnson Telephone Company	45 100	0	4 4	0 8	41 88	0 88	0 86	0 2	0 2	0 4	41 0	18 0	41 88	18 4	43.90 4.55
KMP d/b/a Mid-State Tel Co see TDS	100	Ü	4	8	88	00	80	2	2	4		Ü	88	4	4.55
Kasson & Mantorville Tel Co	48	0	5	8	35	35	35	0	0	0	0	0	35	0	0.00
Larson Utilities, Inc. (1) Minnesota Valley Telephone															
Company	12	0	0	1	11	11	11	0	0	0	0	0	11	0	0.00
(2) Winthrop Telephone Company	8	0	0	1	7	7	3	3	1	4	0	0	7	4	57.14
Lismore Coop Tel Co	4 18	0	0 0	0 0	4 18	4	4	0 3	0 0	0 3	0	0 0	4	0	0.00
Lonsdale Tel Loretel Systems, Ins see Arvig Enterprises, Inc.	16	U	U	Ü	10	18	15	3	U	3	0	Ü	18	3	16.67
Mabel Coop Tel Co	21	0	0	0	21	21	20	1	1	2	0	0	21	2	9.52
Manchester-hartland Telephone Co.	10	0	0	0	10	10	10	0	0	0	0	0	10	0	0.00
Mankato Citizens Telephone Co- see Consolidated Communications, Inc.															
Melrose Telephone Cosee Arvig Enterprises, Inc.															
Mid-Communications, Inc see Consolidated Communications, Inc.															
Mid-State Telephone Co. see TDS															
Midcontinent Communications Midwest Telephone Company- see Arvig Enterprises, Inc. Minnesota Valley Tel- see Larson Utilities, Inc. N-U Telecom, Inc.	179	0	20	14	145	0	0	0	0	0	145	33	145	33	22.76
(1) Hutchinson Telephone Company	80	0	3	0	77	77	62	15	3	18	0	0	77	18	23.38
(2) New Ulm Telecom, Inc.	166	0	0	0	166	166	129	37	5	42	0	0	166	42	25.30
(3) Sleepy Eye Telephone Company	36	0	11	0	25	25	16	9	1	10	0	0	25	10	40.00
(4) Western Telephone Company	44	0	0	0	44	44	37	7	1	8	0	0	44	8	18.18
Northern Tel Co (affiliate of Wilderness Valley) Osakis Telephone Company- see Arvig Enterprises, Inc.	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
Park Region Tel Co (affiliate of Valley Tel Co)	25	0	0	5	20	20	19	1	0	1	0	0	20	1	5.00
Paul Bunyan Rural Tel Co	144	0	0	5	139	139	117	22	4	26	0	0	139	26	18.71

						ī	Filed Data			i	ı	i	i		
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 contacted directly F	# of responding subscribers G	# of non- responding subscribers H H=(F-G)	# of ineligible responding subscribers	# of subscribers de- enrolled J J=(H+I)	# of subscribers reviewed by state, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility data base or USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC 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)
The Peoples Telephone Company of Bigfork- see Arvig Enterprises, Inc.					2 (115 0 5)			(. 5)		3 ()			(1.11)	(5.2)	C (((1), 11) 100)
PolarTel (1) Polar Telecommunications Inc. 381614	37	0	0	0	37	37	32	5	0	5	0	0	37	5	13.51
(2) Polar Communications Mutual Aid Corp. 381630	134	0	9	3	122	122	105	17	2	19	0	0	122	19	15.57
(3) Wolverton Telephone Co. 361512	2	0	0	0	2	2	1	1	0	1	0	0	2	1	50.00
Q Link Wireless LLC (Quadrant Holdings Group LLC)	15654	0	1778	381	13495	13495	12047	1448	0	1448	0	0	13495	1448	10.73
Red River Rural Telephone Assoc.	15	0	0	0	15	15	10	5	0	5	0	0	15	5	33.33
Rothsay Telephone Co.	12	0	0	0	12	12	5	7	0	7	0	0	12	7	58.33
Runestone Telecom Assn- 361423	10	0	0	0	10	0	0	0	0	0	10	3	10	3	30.00
Runestone Telecom Assn- 361475	78	0	0	12	66	0	0	0	0	0	66	20	66	20	30.30
Rural Communications Holding Corporation (1) Blue Earth Valley Telephone Co	239	0	0	10	229	54	31	23	0	23	175	0	229	23	10.04
(2) Cannon Valley Telecom, Inc.	39	0	0	2	37	8	7	1	0	1	29	0	37	1	2.70
(3) Easton Telephone Company	27	0	0	1	26	2	2	0	0	0	24	0	26	0	0.00
(4) Eckles Telephone company	55	0	0	4	51	16	12	4	0	4	35	0	51	4	7.84
(5) Granada Telephone Company	4	0	0	0	4	0	0	0	0	0	4	0	4	0	0.00
(6) Pine Island Telephone Company Sacred Heart Telephone Co- see Hanson Communications	39	0	0	2	37	8	6	2	0	2	29	0	37	2	5.41
Sage Telecom Communications LLC (TSC Acquisition Corporation)	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.)	80	0	7	0	73	73	68	5	5	10	0	0	73	10	13.70
Sleepy Eye Telephone Co see NU- Telecom, Inc. Spring Grove Comm Starbuck Telepohone Co-see Hanson Communications	57	0	1	3	53	53	48	5	1	6	0	0	53	6	11.32
T-Mobile Central LLC TAG Mobile LLC TDS Telecommunications Corporation	26 0	0	0	3 0	0	23 0	19 0	4 0	0	4 0	0 0	0	23 0	4 0	17.39 #DIV/0!

							Filed Data						_		/ teachine it
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, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility data base or USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	enrolled by	Percent of Subscribers de- enrolled
	Α	В	С	D	E E=(A-B-C-D)	F	G	H H=(F-G)	1	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
(1) Arvig Telephone Company	170	0	2	10	158	0	0	0	0	0	158	52	158	52	32.91
(2) Bridgewater Telephone Co	53	0	0	2	51	0	0	0	0	0	51	11	51	11	21.57
(3) KMP d/b/a Mid-State Tel Co.	1	0	0	0	1	0	0	0	0	0	1	0	1	0	0.00
(4) Mid-State Telephone Company	96	0	1	3	92	0	0	0	0	0	92	34	92	34	36.96
(5) Winsted Telephone Company Tekstar Communications Inc see Arvig Enterprises, Inc.	18	0	0	0	18	0	0	0	0	0	18	6	18	6	33.33
Telrite Corporation d/b/a Life Wireless	13292	0	857	3904	8531	4738	3350	1388	13	1401	3793	0	8531	1401	16.42
Tempo Telecom LLC	106	0	96	5	5	5	2	3	0	3	0	0	5	3	60.00
TerraCom, Inc. Tri-Co Technologies	288 11	0	3 0	81 1	204 10	25 10	25 10	0 0	0 1	0 1	179 0	26 0	204 10	26 1	12.75 10.00
Twin Valley-Ulen Telephone Co see Arvig Enterprises, Inc.	11	U	U	1	10	10	10	Ü	1	1	Ü	Ü	10	1	10.00
Upsala Coop Tel Assn	28	0	0	0	28	28	28	0	0	0	0	0	28	0	0.00
Valley Tel Co (Affiliate of Park Region Tel Co)	8	0	0	1	7	7	4	3	0	3	0	0	7	3	42.86
Virgin Mobile USA, LP dba Assusrance Wireless *	19730	0	2472	4355	12903	13341	11973	1368	127	1495	0	0	13341	1495	11.21
West Central Tel Assn. Western Telepone Company see NU-	58	0	1	3	54	54	47	7	2	9	0	0	54	9	16.67
Telecom, Inc. Wikstrom Telephone Co., Inc.	208	0	1	4	203	35	28	7	1	8	168	0	203	8	3.94
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	127	0	0	13	114	114	83	31	0	31	0	0	114	31	27.19
(2) Windstream Communications LLC-361482	38	0	0	6	32	32	28	4	0	4	0	0	32	4	12.50
Winnebago Coop Telecom Association	8	0	0	0	8	0	0	0	0	0	8	3	8	3	37.50
316337 Winnebago Coop Telecom Association 369029	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Winsted Telephone Co. see TDS															
Winthrop Tel- see Larson Utilities, Inc. Wolverton Telephone Co. 361512-															
see PolarTel Woodstock Tel Co Zumbrota Telephone Co- see Hanson Communications, Inc.	23	0	0	1	22	22	22	0	1	1	0	0	22	1	4.55
* Column E represents a 2% (438 subsci	ribers) reduction	in subscriber	count submitte	ed on Form 497 an	d not included in r	l nonthly subsidy fil	ing so as to not	over collect as p	oer Virgin Mobile	in discussion witl	FCC and USAC (4	-21-17).			
2016	86724	150	8857	17543	60174	43629	35216	8412 19.28%	191 0.44%	8603 19.7%	16983	1110 6.5%	60612	9713	16.02%
2015	89070	163	7022	25531	56354	47709	37469	10219 21.42%	231 0.48%	10450 21.9%	9033	1061 11.7%	56734	11511	20.29%

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	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, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility data base or USAC	recertify directly, or by	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
		Α	В	С	D	E	F	G	Н	1	J	K	L	М	N	0
						E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)
2014		101425	190	8885	27841	64509	58458	37818	20640	646	21286	7720	2413	66178	23699	35.81%
									35.31%	1.11%	36.4%		31.3%			
2013		68081				63302	39002	31018	7983	641	8624	4803	1811	63302	10435	16.48%
									20.47%	1.64%	22.1%		37.7%			
2012		86891				72327	70615	30440	30140		30599	1712	253	72327	30852	42.66%
									42.68%		43.3%		14.8%			
														•		

2016 ETC Lifeline Re-Certification Results USAC Companies

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ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year		# 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 de-enrolled by USAC	recertify	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	Α	В	С	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
Albany Mutual Telephone Association	59	0	18	1	40	0	0	0	0	0	40	24	40	24	60.00
Arvig Enterprises, Inc.															
(1) Arrowhead Communications Corporation	24	0	0	0	24	0	0	0	0	0	24	9	24	9	37.50
(2) Callaway Telephone Company, Inc.	11	0	1	0	10	0	0	0	0	0	10	4	10	4	40.00
(3) Cllements Telephone Co.	2	0	0	0	2	0	0	0	0	0	2	1	2	1	50.00
(4) Eagle Valley Telephone Company	28	0	0	1	27	0	0	0	0	0	27	9	27	9	33.33
(5) East Otter Tail Telephone Company	388	0	31	19	338	0	0	0	0	0	338	130	338	130	38.46
(6) Felton Telephone Company	6	0	0	0	6	0	0	0	0	0	6	2	6	2	33.33
(7) Home Telephone Company	18	0	0	0	18	0	0	0	0	0	18	4	18	4	22.22
(8) Loretel Systems Inc.	155	0	14	8	133	0	0	0	0	0	133	53	133	53	39.85
(9) Melrose Telephone Company	209	0	7	8	194	0	0	0	0	0	194	68	194	68	35.05
(10) Midwest Telephone Company	82	0	5	2	75	0	0	0	0	0	75	29	75	29	38.67
(11) Osakis Telephone Company	29	0	2	3	24	0	0	0	0	0	24	10	24	10	41.67
(12) The Peoples Telephone Co. of Bigfork	33	0	1	1	31	0	0	0	0	0	31	12	31	12	38.71
(13) Redwood County Telephone Company	42	0	2	2	38	0	0	0	0	0	38	10	38	10	26.32
(14) Tekstar Communications Inc.	442	0	19	25	398	0	0	0	0	0	398	150	398	150	37.69
(15) TwinValley-Ulen Telephone Company	134	0	5	4	125	0	0	0	0	0	125	49	125	49	39.20
CenturyLink CenturyLink-Chester	1	0	0	0	1	0	0	0	0	0	1	0	1	0	0.00
Benton Coop Tel Co	63	0	0	6	57	0	0	0	0	0	57	25	57	25	43.86
Emily Cooperative Tel	28	0	0	2	26	0	0	0	0	0	26	5	26	5	19.23
Frontier Communications Corp.	20	Ü	Ü	-	20		Ü	Ü	· ·	Ü	20	J	20	3	15.25
(1) Citizens Tel of Minnesota (361123)	738	0	43	37	658	0	0	0	0	0	658	147	658	147	22.34
(2) Citizens Tel of Minnesota (367123)	23	0	0	3	20	0	0	0	0	0	20	6	20	6	30.00
(3) Frontier Communications of MN (361367)	532	0	43	20	469	0	0	0	0	0	469	118	469	118	25.16
Halstad Telephone Company	21	0	0	0	21	0	0	0	0	0	21	7	21	7	33.33
Interstate Telecommunications	45	0	4	0	41	0	0	0	0	0	41	18	41	18	43.90
Midcontinent Communications	179	0	20	14	145	0	0	0	0	0	145	33	145	33	22.76

2016 ETC Lifeline Re-Certification Results USAC Companies

ЕТС	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year		# 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	recertify directly, or by	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	А	В	С	D	E E=(A-B-C-D)	F	G	H H=(F-G)	1	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
Runestone Telecom Assn- 361423	10	0	1	0	9	0	0	0	0	0	9	5	9	5	55.56
Runestone Telecom Assn- 361475	78	0	0	12	66	0	0	0	0	0	66	20	66	20	30.30
TDS Telecommunications Corporation															
(1) Arvig Telephone Company	170	0	2	10	158	0	0	0	0	0	158	52	158	52	32.91
(2) Bridgewater Telephone Co	53	0	0	2	51	0	0	0	0	0	51	11	51	11	21.57
(3) KMP d/b/a Mid-State Tel Co.	1	0	0	0	1	0	0	0	0	0	1	0	1	0	0.00
(4) Mid-State Telephone Company	96	0	1	3	92	0	0	0	0	0	92	34	92	34	36.96
(5) Winsted Telephone Company	18	0	0	0	18	0	0	0	0	0	18	6	18	6	33.33
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
					0										
2016 Totals	3729	0	221	183	3325	0	0	0 #DIV/0!	0	0 #DIV/0!	3325	1056 31.8%	3325	1056	31.76
2015 Totals	3219	0	347	253	2619	8	8	0	0	0	2619	856	2619	856	32.68
			5.0%					0.0%		0.0%		32.7%			
2014 Results	3729	0	81	0	3648	5	5	0	0	0	3162	1796	3167	1796	56.71
2013 Results													3162	1796	56.80
						I									

2016 ETC Lifeline Re-Certification Results Attachment 3

						Wireline Data ba	se & Direct Co	ntact Companie	es .				-		
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 contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, elibigility data base	# of subscribers de-enrolled by state, elibigility 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
	Α	В	С	D	E	F	G	H	1	J	K	L	M	N	0
CenturyLink					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)
(1) CenturyLink-Embarq	634	0	11	11	612	115	85	30	0	30	497	0	612	30	4.90
(2) CenturyLink-MN	340	0	9	8	323	323	232	91	0	91	0	0	323	91	28.17
(3) CenturyLink-QC	9099	150	198	240	8511	1440	1105	335	0	335	7071	0	8511	335	3.94
(4) CenturyLink-NW Wisc	187	0	3	6	178	44	8	36	0	36	134	0	178	36	20.22
Consolidated Communications, Inc.															
(1) Consolidated Communications of	442		47	2	42.4	244	24.4	•	0	0	240	26	42.4	24	0.02
Minnesota	443	0	17	2	424	214	214	0	8	8	210	26	424	34	8.02
(2) Mid-Communications, Inc.	153	0	8	0	145	70	70	0	1	1	75	6	145	7	4.83
Consolidated Tel Co	138	0	2	11	125	15	8	7	0	7	110	0	125	7	5.60
(1) C-I Communications	31	0	0	6	25	3	3	0	0	0	22	0	25	0	0.00
Farmers-Federated															
(1) Farmers Mutual Tel (361389)	24	0	1	0	23	4	4	0	0	0	19	0	23	0	0.00
(2) Farmers Mutual Technologies Inc. (369020)	10	0	0	1	9	1	1	0	0	0	8	0	9	0	0.00
(3) FederatedTelephone Coop (369021)	48	0	1	11	36	8	7	1	0	1	28	0	36	1	2.78
(4) Federated Telephone Coop(361403)	17	0	0	1	16	16	16	0	1	1	0	0	16	1	6.25
(5) Federated Telephone Cooperative (361390)	46	0	1	3	42	4	1	3	0	3	38	0	42	3	7.14
Garden Valley Tel Co	254	0	0	18	236	23	15	8	4	12	213	0	236	12	5.08
Gardonville Coop Tel Assn	46	0	0	0	46	8	8	0	0	0	38	0	46	0	0.00
Lonsdale Tel	18	0	0	0	18	18	15	3	0	3	0	0	18	3	16.67
Rural Communications Holding															
Corporation (1) Blue Earth Valley Telephone Co	239	0	0	10	229	54	31	23	0	23	175	0	229	23	10.04
(2) Cannon Valley Telecom, Inc.	39	0	0	2	37	8	7	1	0	1	29	0	37	1	2.70
(3) Easton Telephone Company	27	0	0	1	26	2	2	0	0	0	24	0	26	0	0.00
(4) Eckles Telephone company	55	0	0	4	51	16	12	4	0	4	35	0	51	4	7.84
(5) Granada Telephone Company	4	0	0	0	4	0	0	0	0	0	4	0	4	0	0.00
(6) Pine Island Telephone Company	39	0	0	2	37	8	6	2	0	2	29	0	37	2	5.41
Wikstrom Telephone Co., Inc.	208	0	1	4	203	35	28	7	1	8	168	0	203	8	3.94
2016 Totals	12099	150	252	341	0 11356	2429	1878	0 551 22.7%	15	0 566 23.3%	8927	32 0.4%	0 11356	0 598	#DIV/0! 5.27
2015 Totals	2059	0	55	88	1916	576	511	82 0.1	7	89 0.2	1368	82 0.1	1944	171	8.80
2014 Totals	3246	150	26	178	3042	1248	805	444	14	458	1794	25	3043	483	15.87

						Wireline Data ba	se & Direct Cor	tact Companie	s		•	ı	•		
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year		# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	reviewed by	data base	recertify directly, or by	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	Α	В	С	D	E E=(A-B-C-D)	F	G	H H=(F-G)	1	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
2013 Results	2771		150		2621								2942	387	13.15

2016 ETC Lifeline Re-Certification Results Wireline Direct Contact Only Companies

								,			I		İ		
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 contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility 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
	Α	В	Ċ	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
Ace Telephone Association 361346	169	0	4	6	159	159	128	31	0	31	0	0	159	31	19.50
Alliance ETC- (Hills)	18	0	0	4	14	14	13	1	0	1	0	0	14	1	7.14
American Broadband and Telecommunications	250	0	33	99	118	118	56	62	0	62	0	0	118	62	52.54
City of Barnesville Municipal Telephone	41	0	0	0	41	41	41	0	1	1	0	0	41	1	2.44
Christensen Communications	18	0	0	1	17	17	17	0	1	1	0	0	17	1	5.88
Company Dunnell Tel Co, Inc.	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
Hanson Communications, Inc.						2.4	22								5.00
(1) Clara City Telephone Co	34	0	0	0	34	34	32	2	0	2	0	0	34	2	5.88
(2) Sacred Heart Telephone Co	8	0	0	0	8	8	6	2	0	2	0	0	8	2	25.00
(3) Starbuck Telepohone Co	60	0	0	0	60	60	52	8	0	8	0	0	60	8	13.33
(4) Zumbrota Telepoone Co	34	0	0	0	34	34	26	8	0	8	0	0	34	8	23.53
Harmony Telephone Company (MSG Tel, Inc holding company)	34	0	1	4	29	29	29	0	1	1	0	0	29	1	3.45
Johnson Telephone Company	100	0	4	8	88	88	86	2	2	4	0	0	88	4	4.55
Kasson & Mantorville Tel Co	48	0	5	8	35	35	35	0	0	0	0	0	35	0	0.00
Larson Utilities, Inc.															
(1) Minnesota Valley Telephone Company	12	0	0	1	11	11	11	0	0	0	0	0	11	0	0.00
(2) Winthrop Telephone Company	8	0	0	1	7	7	3	3	1	4	0	0	7	4	57.14
Lismore Coop Tel Co	4	0	0	0	4	4	4	0	0	0	0	0	4	0	0.00
Mabel Coop Tel Co	21	0	0	0	21	21	20	1	1	2	0	0	21	2	9.52
•	10	0	0	0	10	10	10	0	0	0	0	0	10	0	0.00
Manchester-hartland Telephone Co. N-U Telecom, Inc.	10	U	U	U	10	10	10	U	U	U	U	U	10	U	0.00
•	80	0	3	0	77	77	62	15	3	18	0	0	77	18	23.38
(1) Hutchinson Telephone Company				0							0				
(2) New Ulm Telecom, Inc.	166	0	0		166	166	129	37	5	42	-	0	166	42	25.30
(3) Sleepy Eye Telephone Company	36	0	11	0	25	25	16	9	1	10	0	0	25	10	40.00
(4) Western Telephone Company	44	0	0	0	44	44	37	7	1	8	0	0	44	8	18.18
Northern Tel Co (affiliate of Wilderness Valley)	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
Park Region Tel Co (affiliate of Valley	25	0	0	5	20	20	19	1	0	1	0	0	20	1	5.00
Tel Co) Paul Bunyan Rural Tel Co	144	0	0	5	139	139	117	22	4	26	0	0	139	26	18.71
PolarTel (1) Polar Telecommunications Inc.	37	0	0	0	37	37	32	5	0	5	0	0	37	5	13.51
381614 (2) Polar Communications Mutual	134	0	9	3	122	122	105	17	2	19	0	0	122	19	15.57
Aid Corp. 381630	-	_	-	_	•	2		,	2	_	_	2	2	4	E0.00
(3) Wolverton Telephone Co. 361512	2	0	0	0	2	2	1	1	0	1	0	0	2	1	50.00

2016 ETC Lifeline Re-Certification Results Wireline Direct Contact Only Companies

Red River Rural Telephone Assoc. 15 0 0 0 15 15 10 5 0 5 0 0 15 15	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 contacted directly	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, elibigility data base or USAC	# of subscribers de-enrolled by state, elibigility data base or USAC	recertify	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
Rothsay Telephone Co. 12		Α	В	С	D		F	G		1	-	К	L			
Scott Rice Tel Co duba Integra Telecom (Integra Telecom Holding Inc.) 80 0 7 0 73 73 68 5 5 10 0 0 0 73 10 13.70 Spring Grove Comm 57 0 1 3 53 53 53 48 5 1 6 0 0 0 53 6 11.32 Thirt Co Technologies 11 0 0 0 1 1 10 10 10 0 0 1 1 1 0 0 0 10 1	Red River Rural Telephone Assoc.	15	0	0	0	15	15	10	5	0	5	0	0	15	5	33.33
Untegra Telecom Holding Inc.) 80 0 7 0 7 3 7 88 5 10 0 0 7 3 10 13.70 14.10 10.00 10.00 11.11 10.00 10.00 11.11 10.00 10.00 11.11 10.00 10.00 10.11 10.00 10.00 10.11 10.00 10.00 10.11 10.00 10.	Rothsay Telephone Co.	12	0	0	0	12	12	5	7	0	7	0	0	12	7	58.33
Tri-Co Technologies 11 0 0 0 1 1 10 10 10 10 0 1 1 1 0 0 0 1 1 10 0 0 1 1 10 0 0 1 1 10 0 0 1 1 10 0 0 1 1 10 0 0 1 1 10 0 0 1 1 10 0 0 1 1 10 0 0 1 1 10 0 0 1 1 1 1 1 0 0 0 0 1	=	80	0	7	0	73	73	68	5	5	10	0	0	73	10	13.70
Upsala Coop Tel Assn 36 0 0 0 4 32 6 18.75 Valley File Co (Affiliate of Park Region 12 0 0 1 1 7 7 7 4 3 0 0 0 7 3 42.86 West central Tel Assn. 58 0 1 3 3 54 54 54 47 7 2 9 9 0 0 0 54 9 16.67 Wilderness Valley Tel Co (Affiliate of Northern Tel Co) Windstream Communications LLC- 361414 (2) Windstream Communications LLC- 361414 (2) Windstream Communications LLC- 2015 Totals 15075 163 471 681 13760 13760 10155 3567 43 3610 0 0 13760 3610 26.24% 2013 Results	Spring Grove Comm	57	0	1	3	53	53	48	5	1	6	0	0	53	6	11.32
Valley Tel Co (Affiliate of Park Region 8 0 0 0 1 7 3 42.86 Tel Co) West Central Tel Assn. 58 0 1 3 3 54 54 47 7 2 9 0 0 0 54 9 16.67 Wilderness Valley Tel Co (affiliate of Northern Tel Co) Windstream Communications (1) Windstream Communications LLC-3 88 0 0 0 6 32 32 32 28 4 0 0 3 1 0 0 0 32 4 12.50 361482 Woodstock Tel Co 2 3 0 0 0 0 1 2 2 2 2 2 2 0 0 0 0 0 0 0 0 0	Tri-Co Technologies	11	0	0	1	10	10	10	0	1	1	0	0	10	1	10.00
Tel Co	Upsala Coop Tel Assn	36	0	0	4	32	32	26	6	0	6	0	0	32	6	18.75
Wilderness Valley Tel Co (affiliate of 2 0 0 0 0 2 2 2 2 0 0 0 0 0 0 0 0 0 0	, ,	8	0	0	1	7	7	4	3	0	3	0	0	7	3	42.86
Northern Tel Co) Windstream Communications LIC- (1) Windstream Communications LIC- (2) Windstream Communications LIC- 361414 (2) Windstream Communications LIC- 361642 (3) Windstream Communications LIC- 361648 (2) Windstream Communications LIC- 361648 (2) Windstream Communications LIC- 361648 (3) Quality Color C	West Central Tel Assn.	58	0	1	3	54	54	47	7	2	9	0	0	54	9	16.67
(1) Windstream Communications LLC-361414 (2) Windstream Communications LLC-361415 (2) Windstream Communications LLC-361462 (3) Windstream Communications LLC-361462 (4) Windstream Communications LC-361462 (4) Windstrea		2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
361482 38 0 0 6 32 32 28 4 0 4 0 0 4 0 0 32 4 12.50 Woodstock Tel Co 23 0 0 1 22 1 4.55 O 0 1 1 1 0 0 0 22 1 4.55 O 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	(1) Windstream Communications LLC-	127	0	0	13	114	114	83	31	0	31	0	0	114	31	27.19
2016 Totals 2008 0 79 177 1752 1752 1444 307 33 340 0 0 0 1752 340 19.41 2015 Totals 15075 163 471 681 13760 13760 10155 3567 43 3610 0 0 13760 3610 26.24% 2014 Totals 18091 190 466 831 16604 16576 12064 4512 36 4548 32 21 16608 4569 27.51 2013 Results 17427 4965 4965 43.33%	* /	38	0	0	6	32	32	28	4	0	4	0	0	32	4	12.50
2016 Totals 2008 0 79 177 1752 1752 1444 307 33 340 0 0 0 1752 340 19.41 2015 Totals 15075 163 471 681 13760 13760 10155 3567 43 3610 0 0 13760 3610 26.24% 2014 Totals 18091 190 466 831 16604 16576 12064 4512 36 4548 32 21 16608 4569 27.51 2013 Results 70615 30599 4 43.33%	Woodstock Tel Co	23	0	0	1		22	22		1		0	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 Resuls 70615 30599 43.33%	2016 Totals	2008	0	79	177		1752	1444	307	33	340	0		1752		
2013 Results 17427 4965 28.49% 2012 Resuls 70615 30599 43.33%	2015 Totals	15075	163	471	681	13760	13760	10155	3567	43	3610	0	0	13760	3610	26.24%
2012 Resuls 70615 30599 43.33%	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 Resuls						70615		42.7%				14.8%			43.33%

2016 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		# 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, elibigility data base	# of subscribers de-enrolled by state, elibigility data base	recertify	# of subscribers de- enrolled by non-response or ineligibility	Percent of Subscribers de- enrolled
	Α	В	С	D	E E=(A-B-C-D)	F	G	H H=(F-G)	1	J J=(H+I)	К	L	M M= (F+K)	N N=(J+L)	O O=((N/M)*100)
American Broadband and Telecommunications	250	0	33	99	118	118	56	62	0	62	0	0	118	62	52.54
Blue Jay Wireless LLC	4834	0	953	2311	1570	993	202	791	0	791	577	0	1570	791	50.38
Boomerang Wirless, LLC d/b/a enTouch Wireless	3080	0	385	923	1772	1772	831	941	0	941	0	0	1772	941	53.10
Budget PrePay Inc.	3259	0	565	942	1752	1570	1129	441	0	441	182	0	1752	441	25.17
Global Connection Inc of America	243	0	150	70	23	23	17	6	0	6	0	0	23	6	26.09
I-Wireless LLC	8387	0	1049	3871	3467	3467	2297	1170	3	1173	0	0	3467	1173	33.83
Q Link Wireless LLC (Quadrant Holdings Group LLC)	15654	0	1778	381	13495	13495	12047	1448	0	1448	0	0	13495	1448	10.73
Sage Telecom Communications LLC (TSC Acquisition Corporation)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
T-Mobile Central LLC	26	0	0	3	23	23	19	4	0	4	0	0	23	4	17.39
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	13292	0	857	3904	8531	4738	3350	1388	13	1401	3793	0	8531	1401	16.42
Tempo Telecom LLC (subsidiary of Birch Equity Partners)	106	0	96	5	5	5	2	3	0	3	0	0	5	3	60.00
TerraCom, Inc.	288	0	3	81	204	25	25	0	0	0	179	26	204	26	12.75
Virgin Mobile USA, LP	19730	0	2472	4355	12903 0	13341	11973	1368 0	127	1495 0	0	0	13341 0	1495 0	11.21 #DIV/0!
2016 Totals	69149	0	8341	16945	43863	39570	31948	7622	143	7765	4731	26	44301	7791	#DIV/0! 17.59
2045 T. J. J.	68648	0	6149	24503	37996	33360	26792	19.3% 6568	101	19.6% 6749	4988	0.5% 109	38348	6858	17.00
2015 Totals	00040	0	0149	24303	37990	33300	20/92	19.7%	181	20.2%	4500	2.2%	30340	0000	17.88
2014 Totals	75852	0	8253	26580	41019	40803	25086	15717	601	16318	1731	4	42534	16322	38.37
								38.5%		40.0%	_	0.2%			
2013 Results	40219	0	1535	18442	20242	20269	17351	2918 20.5%	369	3287 22.1%	0	0 37.7%	20269	3287	16.22

^{*} Column E represents a 2% (438 subscribers) reduction in subscriber count submitted on Form 497 and not included in monthly subsidy filing so as to not over collect as per Virgin Mobile in discussion with FCC and USAC (4-21-17).

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce Comments

Docket No. P999/M-17-20

Dated this 12th day of September 2017

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-20_PR-17-20
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_17-20_PR-17-20
lan	Dobson	Residential.Utilities@ag.sta te.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-20_PR-17-20
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_17-20_PR-17-20

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeffrey	Ansted	JAnsted@ambt.net	American Broadband and Telecommunications Company	One Seagate Toledo, OH 43604	Electronic Service	No	SPL_SLETC List
lssa	Asad	issa@QuadrantHoldings.co m	Q Link Wireless LLC	499 E Sheridan St Ste 400 Dania Beach, FL 33004	Electronic Service	No	SPL_SLETC List
Sam	Bailey	Sam.Bailey@iwirelesshom e.com	i-Wireless	1 Levee Way Ste 3104 Newport, KY 41071	Electronic Service	No	SPL_SLETC List
Dianne	Barthel	Dianne.barthel@centurylink .com	Centurylink Communications, LLC	200 South Fifth Street Room 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SLETC List
Jim	Beattie	N/A	Granada Telephone Company dba BEVCOMM	123 W 7th St. Blue Earth, MN 56013	Paper Service	No	SPL_SLETC List
Jim	Beattie	N/A	Cannon Valley Telecom, Inc.	123 W 7th St Blue Earth, MN 56013	Paper Service	No	SPL_SLETC List
Jim	Beattie	N/A	Easton Telephone Co. dba BEVCOMM	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SLETC List
Jim	Beattie	N/A	Pine Island Telephone Company dba BEVCOMM	123 W 7th St Blue Earth, MN 56013	Paper Service	No	SPL_SLETC List
Jim	Beattie	N/A	Eckles Telephone Company dba BEVCOMM	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SLETC List
Jim	Beattie	N/A	Blue Earth Valley Telephone Co.	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SLETC List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Bickett		Valley Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SLETC List
David	Bickett		Park Region Mutual Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SLETC List
Karl	Blake	N/A	Wolverton Telephone Company	PO Box 270 Park River, ND 58270	Paper Service	No	SPL_SLETC List
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	SPL_SLETC List
John	Bokelmann	BADEMAIL- manchester@deskmedia.c om	Manchester Heartland	204 Railroad St Manchester, MN 56007-5012	Paper Service	No	SPL_SLETC List
Christopher J	Bunce	chris.bunce@mytempo.co m	Tempo Telecom, LLC.	2323 Grand Blvd Ste 925 Kansas City, MO 64108	Electronic Service	No	SPL_SLETC List
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	SPL_SLETC List
Danny	Busche	N/A	Minnesota Valley Telephone Company	318 Second Ave East P O Box 310 Franklin, MN 55333-0310	Paper Service	No	SPL_SLETC List
Mary	Calderon	mary.calderon@tagmobile. com	Tag Mobile, L.L.C.	1330 Capital Pkwy Carrollton, Texas 75006	Electronic Service	No	SPL_SL_ETC List
Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	SPL_SLETC List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Melissa	Driskell	melissa.driskell@telrite.co m	Telrite Corporation	2300 Windy Ridge Pkwy, Ste 3508 Atlanta, GA 30339	Electronic Service	No	SPL_SLETC List
Bob	Elston	belston@sleepyeye- mn.com	Sleepy Eye Public Utilities Commission	130 Second Avenue PO Box 408 Sleepy Eye, MN 56085	Electronic Service	No	SPL_SLETC List
Robin	Enkey	robine@budgetprepay.com	Budget PrePay, Inc. dba Budget Phone	1325 Barksdale Blvd Ste 200 Bossier City, LA 71111-4600	Electronic Service	No	SPL_SLETC List
Donna	Eul	donnaeul@fedtel.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	SPL_SLETC List
Kristen	Farole	kfarole@terracominc.com	TerraCom, Inc.	401 E Memorial Rd Ste 400 Oklahoma City, OK 73114	Electronic Service	No	SPL_SLETC List
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	SPL_SLETC List
Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	SPL_SLETC List
Shari	Flanders	sflanders@polartel.com	Polar Communications	PO Box 270 Park River, ND 58270	Electronic Service	No	SPL_SL_ETC List
Debby	Floerchinger	floerchi@crosslake.net	Crosslake Communications	PO Box 70 Crosslake, MN 56442	Electronic Service	No	SPL_SLETC List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jennifer	Guck	jennifer.guck@arvig.com	Arvig Enterprises	150 2nd St. SW Perham, MN 56573	Electronic Service	No	SPL_SLETC List
William	Haas	N/A	T-Mobile Central, LLC	601 Pennsylvania Av. NW Ste 800 Washington, DC 20004-2710	Paper Service	No	SPL_SLETC List
Bruce	Hanson	N/A	Starbuck Telephone Company	1104 19th Ave SW Willmar, MN 56201-5006	Paper Service	No	SPL_SLETC List
Bruce	Hanson	N/A	Zumbrota Telephone Company	1104 19th Ave SW Ste B Willmar, MN 56201	Paper Service	No	SPL_SLETC List
Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1104 19th Ave SW Ste B Willmar, MN 56201	Electronic Service	No	SPL_SLETC List
Bruce	Hanson	N/A	Clara City Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SLETC List
Kim	Haugen	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd AvePO Box 127 Lismore, MN 56155	Electronic Service	No	SPL_SLETC List
Kent	Hedstrom	kent@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	SPL_SLETC List
Angela	Hoke	Angela.Hoke@birch.com	Ionex Communications North, Inc. dba Birch Communications	2323 Grand Blvd Ste 925 Kansas City, MO 64108	Electronic Service	No	SPL_SLETC List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Floyd	Jasinski	floyd.jasinski@consolidated .com	Consolidated Communications of Minnesota Company	PO Box 619969 Roseville, CA 95661-0969	Electronic Service	No	SPL_SLETC List
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	SPL_SLETC List
Dwayne	Johnson	jtcbusiness@means.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	SPL_SLETC List
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	SPL_SLETC List
Melanie	King	BADEMAIL- mking@sagetelecom.net	Sage Telecom Communications, LLC	10440 N Central Expy Ste 700 Dallas, TX 75231-2228	Paper Service	No	SPL_SLETC List
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	SPL_SLETC List
Julia	Kolka	juliekolka@mabeltel.coop	Mabel Cooperative Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	SPL_SLETC List
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	SPL_SLETC List
Andi	Livingston	Andrea.livingston@midco.c om	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	SPL_SLETC List
Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Electronic Service	No	SPL_SLETC List

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Melanie	Nelson	mdnelson@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	SPL_SLETC List
Josh	Netland	jnetland@emily.net	Emily Cooperative Telephone Company	PO Box 100 40040 State Hwy 6 Emily, MN 564470100	Electronic Service	No	SPL_SLETC List
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	SPL_SLETC List
Craig	Otterness	otter@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	SPL_SLETC List
Jean	Pauk	jean.pauk@tdstelecom.co m	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	SPL_SLETC List
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	SPL_SLETC List
Allison	Plamann	allisonplamann@nu- telecom.net	Hutchinson Telephone Company	235 Franklin St SW Hutchinson, MN 55350	Electronic Service	No	SPL_SLETC List
Ann	Prockish	ann.prockish@centurylink.c om	Embarq Minnesota, Inc. dba CenturyLink	100 CENTURYLINK DR MONROE, LA 71203-2041	Electronic Service	No	SPL_SLETC List
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Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25 Wawina, MN 557369721	Electronic Service	No	SPL_SLETC List
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Bryan	Roth	Bryan.roth@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	SPL_SLETC List
Greg	Sayre	gregg.sayre@frontiercorp.c om	Citizens Telecommunications Company of MN,LLC	180 South Clinton Avenue Rochester, NY 14646	Electronic Service	No	SPL_SLETC List
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	SPL_SLETC List
David	Schornack	N/A	The Peoples Telephone Company of Bigfork	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SLETC List
David	Schornack	N/A	Twin Valley-Ulen Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SLETC List
David	Schornack	N/A	Callaway Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SLETC List

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David	Schornack	N/A	East Otter Tail Telephone Company	150 2nd Street SW Perham, MN 56573	Paper Service	No	SPL_SLETC List
David	Schornack	N/A	Felton Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SLETC List
Harold	Selness		Mabel Cooperative Telephone Company	PO Box 368 214 North Main Mabel, MN 55954	Paper Service	No	SPL_SLETC List
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