

March 20, 2014

Mr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: The Matter of Intercarrier Compensation
Reform Required by FCC Order and Rules

Docket No.P999/PR-14-15

Dear Mr. Haar:

Enclosed are comments filed on behalf of the Minnesota Independent Coalition in response to the Request for Comments published March 12, 2014, regarding the Recommended Procedures for 2014 Access Rate Changes filed by the Minnesota Department of Commerce ("Department") February 4, 2014.

Please call me at 651-621-8631 with any questions.

Very truly yours,



Patrick Holton

Telecommunications Consultant for
Minnesota Independent Coalition

Enclosures

cc: Linda Chavez, Minnesota Department of Commerce

**STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES
COMMISSION**

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
J. Dennis O'Brien	Commissioner
Betsey Wergin	Commissioner

RE: The Matter of Intercarrier Compensation Docket No.P999/PR-14-15
Reform Required by FCC Order and Rules

COMMENTS OF MINNESOTA INDEPENDENT COALITION

The following Comments are submitted to the Minnesota Public Utilities Commission (“Commission”) on behalf of the Minnesota Independent Coalition¹ (“MIC”) in response to the Request for Comments published March 12, 2014, regarding the Recommended Procedures for 2014 Access Rate Changes filed by the Minnesota Department of Commerce (“Department”) February 4, 2014. The MIC members include small incumbent Rate of Return local exchange carriers (“Incumbent LECs”) who provide local exchange service, including origination and termination of toll traffic for interexchange carriers (“IXCs”). In addition many of the individual MIC members also provide competitive Local Exchange service in Minnesota.

The MIC is in general agreement with the Recommended Procedures for 2014 Access Rate Changes as filed by the Department but requests clarifications as noted in these comments to include additional provisions that were applicable to the July 2013 Tariff filings in Docket No. P999/PR-13-137

¹ The Minnesota Independent Coalition is a group of approximately 75 local exchange carriers providing service in Rural Minnesota

In Reply comments filed April 18, 2013 in the Matter of Intercarrier Compensation Reform Docket No. P999/PR-13-137, the Department modified its prior recommendations to include, among other items that:

- “Companies whose intrastate access rates already equal interstate access rates need only file an informational letter so stating.”
- “If intrastate access rates are identical to interstate rates, filings may identify in their intrastate tariffs the electronic links to interstate access rates.”

These modified recommendations were adopted by the Commission for filings in Docket No. P999/PR-13-137. Based on these changes, all or virtually all MIC members made access filings for their ILEC Operations, and where applicable for their CLEC operations, in Docket No. P999/PR-13-137 that established electronic links in their intrastate tariffs to their interstate access rates.

The MIC requests that the Recommended Procedures for 2014 Access Rate Changes filed by the Department on February 4, 2014 be clarified to reflect that:

- A. If a company’s intrastate access rates are identical to its interstate rates, the company may identify in their intrastate tariffs the electronic links to interstate access rates.
- B. Companies whose intrastate access rates already equal interstate access rates and who, pursuant to FCC Rules, effective July 1, 2014 will still have intrastate access rates that equal interstate access rates need only file an informational letter so stating. Such letters to be filed by individual companies or at a company’s option, in cases where multiple companies participate in group tariffs, participants in the group tariff may file a joint letter.

CONCLUSION

The MIC requests that the Commission modify the Recommended Procedures for 2014 Access Rate Changes filed by the Department on February 4, 2014 to include the changes noted above .

Dated: March 20, 2014.

Respectfully submitted by

Olsen Thielen & Co. Ltd.

A handwritten signature in cursive script, appearing to read "Paul J. Heath".

Consultants on behalf of the Minnesota Independent
Coalition