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January 19, 2016

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

RE: **Comments of the Minnesota Department of Commerce**
Docket No. P999/SA-16-24

Dear Mr. Wolf:

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

Annual update of telephone exchange boundaries.

The Department recommends that the boundary revisions be accepted and is available to answer any questions the Commission may have.

Sincerely,

/s/ GREGORY J. DOYLE
Manager, Telecommunications

GJD/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. P999/SA-16-24

I. BACKGROUND

On November 6, 2012, the Federal Communications Commission (FCC) Wireline Competition Bureau (Bureau) released a *Report and Order*¹ (*Study Area Boundary Order*) that established requirements for the collection of study area boundaries for purposes of implementing various reforms adopted as part of the *USF/ICC Transformation Order*,² including the FCC's benchmarking rule and the rule eliminating support where an unsubsidized competitor offers voice and broadband service that overlaps an ILEC's study area.³

On February 26, 2013, the Bureau released a subsequent *Order on Reconsideration*⁴ that adopted certain modifications and clarifications to the requirements for the data collection. As set forth in the orders, each ILEC must certify and submit data on the boundary(ies) of the area(s) it serves in a state (study area boundary), or allow a state entity to submit and certify the data on its behalf.⁵

On March 1, 2013, the Minnesota Telecom Alliance (MTA) joined the Minnesota Department of Commerce (Department) in introducing a joint project whereby the MTA and the Department would collaborate to assist Minnesota ILECs in complying with the *Study Area*

¹ *Connect America Fund; High-Cost Universal Service Support*, WC Docket Nos. 10-90, 05-337, Report and Order, 27 FCC Rcd 13528 (Wireline Comp. Bur. 2012) (*Study Area Boundary Order*). The *Study Area Boundary Order* was published in the *Federal Register* on January 28, 2013. See 78 FR 5750.

² See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform—Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (*USF/ICC Transformation Order*), *pets. for review pending sub nom. In re: FCC 11-161*, No. 11- 9900 (10th Cir. filed Dec. 8, 2011).

³ *Study Area Boundary Order*, 27 FCC Rcd 13528, at ¶¶ 2-6.

⁴ *Study Area Boundary Order*, Order on Reconsideration, DA 13-282 (rel. Feb. 26, 2013).

⁵ *Id.* at ¶¶ 2 and 16 (modifying the *Study Area Boundary Order* by allowing states to certify to the accuracy of the data they submit, rather than requiring ILECs to make the certification); *Study Area Boundary Order*, 27 FCC Rcd at 13528, ¶ 17 (allowing state entities to submit shape files on behalf of the states' ILECs).

Boundary Order. All Minnesota ILECs agreed to participate in the project and allow the Department, with Commission approval, to certify and submit Minnesota's study area boundary data.⁶ The Department entered into a contract with the Minnesota Geospatial Information Office (MnGeo) to create an efficient way for ILECs to participate in the review and verification process using an online web map.

On June 26, 2013, in Docket No. P-999/SA-13-381, the Minnesota Public Utilities Commission issued its Order Accepting Digital Exchange Boundary Map as Official Telephone Exchange Boundary Map and Approving for Submission to FCC. In its Order, the Commission states that all disputed study area boundary issues and all proposed digital boundary map changes shall be filed with the Commission for approval.

The annual update is due on March 15th of each year for changes made to telephone exchange boundaries through December 31 of the previous year.⁷ The Department entered into a contract with MnGeo for the purpose of assisting Minnesota ILECs in satisfying the FCC requirement to update the telephone exchange boundary map for any boundary map changes through December 31, 2015.

II. STATEMENT OF ISSUES

Whether the Commission should accept the updated telephone exchange boundary map for filing with the FCC.

III. BACKGROUND

A. TELEPHONE EXCHANGE BOUNDARY REVISION PROCESS

In the current project to update telephone exchange boundary maps, a designated contact person from each ILEC was provided access to a secure MnGeo website. At this website, existing exchange boundaries were viewable and ILECs were able to propose changes on a map layer that is distinct from the actual exchange boundary map. This layer is called the "Red Line Snapping Layer" and also shows all proposed boundary changes that were not agreed upon in the previous exchange boundary verification projects. All proposed boundary lines that have not yet been agreed upon are colored red on the web map.

In addition to proposing any changes so that the electronic map reflects the actual customers served, ILECs were also to review neighboring carriers' proposed changes so agreement can be reached on where the boundaries lie. If the carriers reach an impasse

⁶ *Study Area Boundary Order*, 27 FCC Rcd at 13528, ¶ 8 (The data must be submitted at the exchange level, with a shape file for each study area depicting each exchange as a closed, non-overlapping polygon).

⁷ *Study Area Boundary Order*, 27 FCC Rcd at 13528, ¶ 23 (noting that boundaries can change as the result of a transaction involving the addition or sale of exchanges, new deployment into previously-unserved areas, or an ILEC relinquishing its ETC designation and COLR obligations).

concerning a boundary, the Department offered to help resolve the issue by referring to the paper maps, which were the official maps prior to the Commission's June 26, 2013 Order. Not all of the proposed boundary changes have been agreed upon by adjoining ILECs in the current process, and the Department was asked to assist in the resolution of just one dispute. When it becomes more apparent what the financial implications are of the telephone exchange boundary maps, there may be more incentive for companies to ensure that boundary disputes are resolved.

When adjoining companies reached agreement on a change to the telephone exchange boundary line, the company initiating the proposed revision changes the red line to a blue line on the Red Line Snapping Layer of the web map. With agreement between the companies, the Department has the necessary editing credentials to change the underlying telephone exchange boundary map to match the agreed upon lines, as reflected by blue lines on the web map.

B. *CHANGES TO TELEPHONE EXCHANGE BOUNDARY MAP*

When the underlying telephone exchange boundary is changed on the map, the previous boundary line is no longer available for viewing. The Department has captured the boundary changes with screen shots to show the changes made to the telephone exchange boundaries. Two changes have been made to the maps, as discussed below.

Qwest Corporation d/b/a CenturyLink QC and Paul Bunyan Rural Telephone Company have agreed to a boundary change between CenturyLink QC's Bemidji exchange and Paul Bunyan's Laporte exchange. This boundary change can be seen in Attachment A. The blue line on the map reflects the new boundary line. The area above the blue line will now be reflected on the official maps as part of CenturyLink QC's Bemidji exchange.

Embarq Communications, Inc. d/b/a CenturyLink Communications and Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of MN, LLC have agree to a boundary change between CenturyLink's Hastings exchange, Frontier's Farmington exchange and Citizens' Cannon Falls exchange. This boundary change is partially reflected in Attachment B. The redline on this map reflects the new boundary line. The complete boundary change is shown on a company prepared document rather than a screen shot of the online map. See Attachment C.

IV. COMMISSION ALTERNATIVES

1. Accept the boundary revisions agreed to by the companies as reflected in these comments and authorize the Department to upload all revised shape files to the FCC boundary data website no later than March 15, 2016.
2. Other action the Commission deems appropriate.

V. RECOMMENDATION

The Department recommends alternative 1:

Accept the boundary revisions agreed to by the companies as reflected in these comments and authorize the Department to upload all revised shape files to the FCC boundary data website no later than March 15, 2016.

/lt

Attachment A

http://minnesota.maps.arcgis.com/home/webmap/viewer.html?webmap=34980244535d4aab97e9044a5211e483 Minnesota Telephone Exch...

File Edit View Favorites Tools Help

Convert Select

Home Minnesota Depart... Commerce - Home MN DOC Efilng MN Self Service Site Suggested Sites

Home Minnesota Telephone Exchanges Editor New Map Greg

Details Add Edit Basemap Save Share Print Directions Measure Bookmarks Find address or place

Contents

- Red Line Snapping Layer
 - Agree to the proposed revision
 - Propose what the revised line should be
 - The original line was accurate
- Telephone Exchange Edit Layer
- Quarter Quarter Section Snapping Layer
- Telephone Exchange Base Map
- Topographic

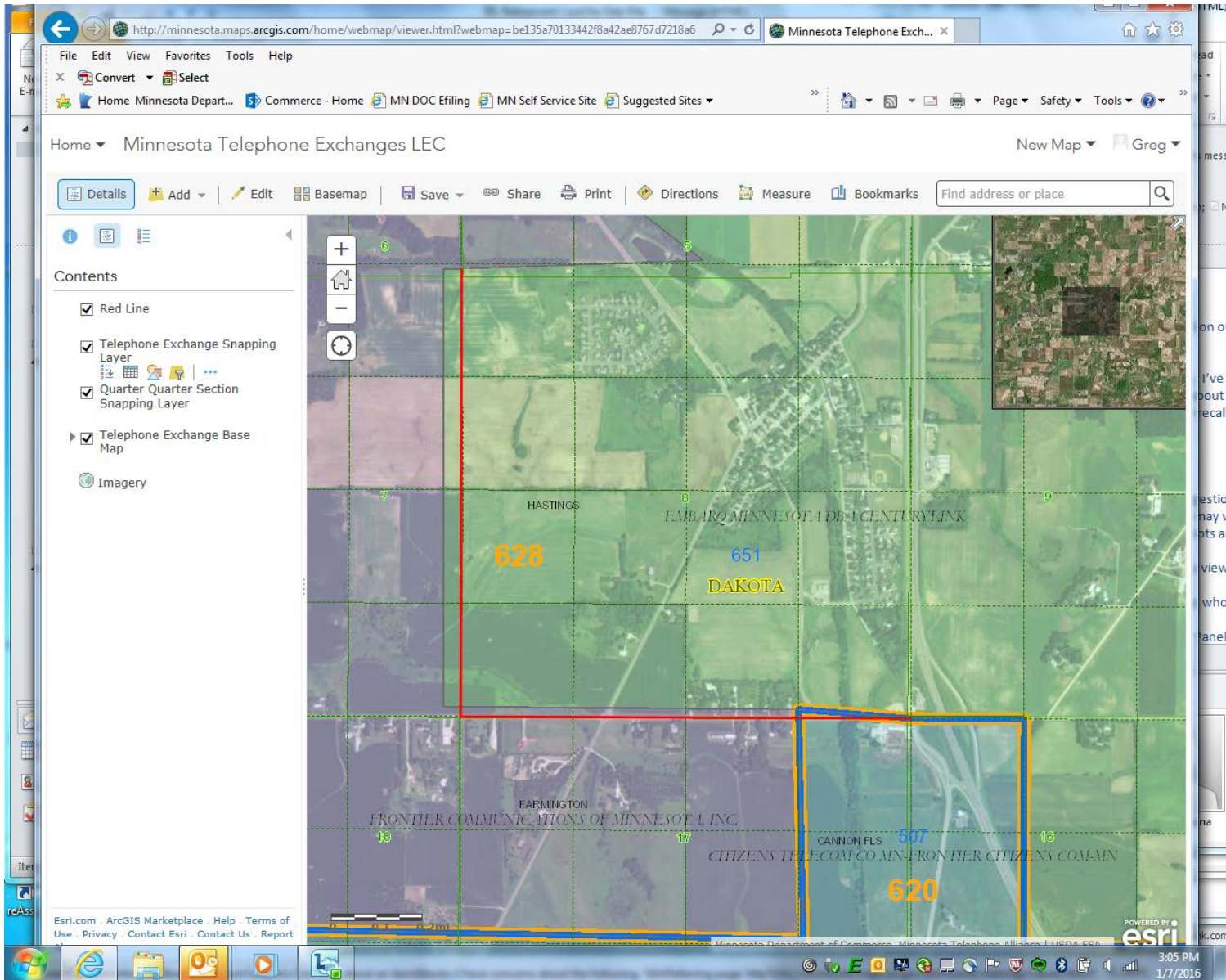
Red Line Snapping Layer (30 features, 0 selected)

Initial_Date	Initial_Company	Adjoin_Date	Adjoin_Company	Change Status should be
	Minnesota, Inc.			Propose what the revised line should be
January 16, 2014	Consolidated Telephone Company		CenturyTel of Minnesota, Inc. dba CenturyLink	Propose what the revised line should be
October 21, 2015	Paul Bunyan Rural Telephone Coop	October 22, 2015	Qwest Corporation	Agree to the proposed revision

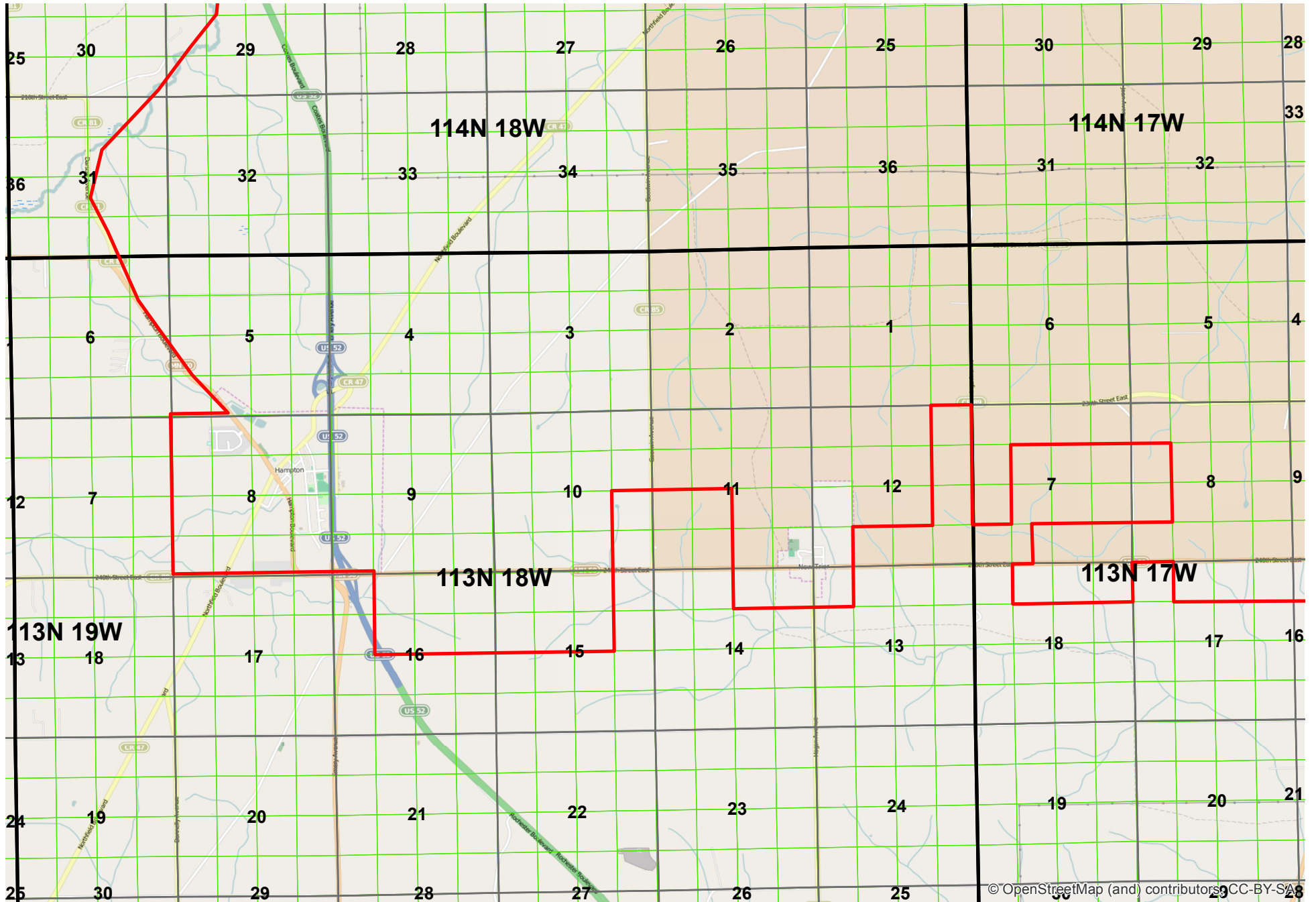
Esri.com · ArcGIS Marketplace · Help · Terms of Use · Privacy · Contact Esri · Contact Us · Report Abuse

7:45 AM 1/7/2016

Attachment B



Proposed Exchange Boundary Between Hastings(CTL) and Cannon Falls(FTR)



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/SA-16-24

Dated this 19th day of January 2016

/s/Sharon Ferguson

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