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March 31, 2015

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

RE: **Comments of the Minnesota Department of Commerce**
Docket No. P999/M-15-20

Dear Mr. Wolf:

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

2014 Lifeline Re-certification Results

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the 2014 Lifeline re-certification filings. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ BRUCE L. LINSCHIED
Financial Analyst

/s/ KATHERINE DOHERTY
Rates Analyst

BLL/KD/It
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. P999/M-15-20

I. BACKGROUND

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 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.¹ Lifeline provides a monthly discount of \$9.25 offered by ETCs.² Minnesota’s Telephone Assistance Plan (TAP) provides an additional discount to qualified low-income consumers in the form of monthly credits on consumers’ telephone bills. TAP provides a monthly discount of \$3.50 offered by all incumbent and competitive local exchange (ILEC and CLEC) service providers.³

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

The following subscriber eligibility criteria apply to both the TAP and Lifeline programs:

- 1) 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)

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.

- National School Lunch Program's free lunch program
- Temporary Assistance to Needy Families (TANF)

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 standards

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 Order.

ETCs filed FCC Form 555 for 2012 with the Commission in compliance with Paragraph 148 of the Lifeline Order and Section 47 C.F.R. 54.416 (b) of the FCC's Rules requiring the reporting of the results of their aggregated re-certification data to the Commission. The Department reviewed this information and on April 22 and May 21, 2013 filed comments in Docket No. P999/M-12-1315 (12-1315) recommending that the Commission find that all the carriers, with one exception that subsequently filed, had complied with the FCC's recertification requirements. On July 23, 2013, the Commission issued its order in Docket No. 12-1315 accepting the 2012 Lifeline recertification results.

ETCs filed FCC Form 555 with the Commission in compliance with Paragraph 148 of the Lifeline Order and Section 47 C.F.R. 54.416 (b) of the FCC's Rules requiring the reporting of the results of their aggregated re-certification data to the Commission. The Department reviewed this information and on May 19, 2014 filed comments in Docket No. P999/M-14-20 (14-20) recommending that the Commission find that all the carriers had complied with the FCC's recertification requirements. On August 5, 2014, the Commission issued its order in Docket No. 14-20 accepting the 2013 Lifeline recertification results.

II. STATEMENT OF ISSUES

What actions, if any, should the Commission take with respect to the Lifeline re-certification filings submitted by ETCs for 2014?

III. APPLICABLE LAW

47 C.F.R § 54.410 (*"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-per-household re-certifications as required by § 54.410(f); or who relies on a temporary address and fails to respond to the carrier’s address re-certification attempts pursuant to § 54.410(g).

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 30 days of the date of the request will trigger de-enrollment. If a subscriber does not respond to the carrier’s notice of impending de-enrollment, 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.

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 re-certification efforts, performed pursuant to § 54.410(f), to the [Federal Communications] Commission and the Administrator. Eligible telecommunications 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. A COMPARISON OF THE 2012, 2013 AND 2014 RE-CERTIFICATION DATA

The 2014 re-certification results were submitted by ETCs to comply with Paragraph 148 of FCC's Lifeline Order and Section 47 C.F.R. 54.416(b) of the FCC's Rules. The 2014 results are presented in the FCC Form 555 format submitted by ETCs and summarized below. The supporting data is provided in Attachment 1.

Subscribers to be Surveyed	Subscribers Contacted Directly	Responding Subscribers	Non-responding Subscribers	Ineligible Subscribers Contacted Directly	Subscribers De-enrolled Contacted Directly	Subscribers Reviewed by Database or USAC	Subscribers De-enrolled by Database or USAC	Total Subscribers De-enrolled
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			(d=b-c)		(f=d+e)			(i=f+h)
64,509	58,458	37,818	20,640	646	21,286	7,720	2,413	23,699
			35.3%		36.4%		31.3%	35.8%

(a). Number of subscribers subject to re-certification: All Lifeline subscribers must re-certify annually in accordance with Paragraph 130 of the Lifeline Order and Section 47 C.F.R. 54.410(f) subp. 1 of the FCC's Rules. In 2014, 64,509 Lifeline subscribers were identified as needing to be surveyed (Column (a) and Attachment 1, Column E). In 2012, 72,327 (Attachment 1, Column E) Lifeline subscribers were required to be surveyed by means of direct contact or by means of the Department of Human Services (DHS) database for re-certification. In 2013, 63,302 (Attachment 1, Column E) Lifeline subscribers were required to be contacted directly, verified by means of the DHS database, or by the Universal Service Administrative Company (USAC).

(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 22.1% in 2013, to 36.4% in 2014 (Attachment 1, Column J). In 2014, ETCs directly contacted 58,458 Lifeline subscribers for re-certification purposes (Column (b) and Attachment 1, Column F). 37,818 Lifeline subscribers responded to ETC direct contact surveys (Column (c) and Attachment 1, Column G). 20,640 Lifeline subscribers did not respond to ETC direct contact surveys (Column (d) and Attachment 1, Column H), and 646 Lifeline subscribers responded to ETC direct contact surveys but were found to be ineligible (Column (e) and Attachment 1, Column I) resulting in 21,286 (Attachment 1, Column J) Lifeline subscribers or a 36.4% de-enrollment rate for ETCs that surveyed their Lifeline subscribers by direct contact (Columns (f) and Attachment 1, Column J).

(g)-(h). Number of subscribers de-enrolled as a result of data base surveys: The de-enrollment rate for Lifeline subscribers surveyed by database increased from 14.8% in 2012 to 37.7% in 2013 and decreased to 31.3% in 2014 (Attachment 1, Column L). ETCs were able to have USAC conduct Lifeline subscribers' surveys for the first time in 2013 as a result of the creation of the National Lifeline Accountability Database (NLAD) to eliminate duplicative Lifeline discount claims. Data base surveys employed USAC, DHS or other

databases, such as Wisconsin Cares or North Dakota Human Services for companies whose operations are primarily in neighboring states. In 2014, 7,720 Lifeline subscribers were surveyed by database (Column (g) and Attachment 1, Column K), and 2,413 Lifeline subscribers or 31.3% were de-enrolled (Column (h) and Attachment 1, Column L).

(i). Overall de-enrollment rate: The total number of Lifeline subscribers de-enrolled declined from 30,852 or 42.6% of total Lifeline subscribers surveyed in 2012 to 10,435 or 16.5% of total Lifeline subscribers surveyed in 2013. In 2014, 23,699 or 35.8% of total Lifeline subscribers surveyed were de-enrolled (Column (i) and Attachment 1, Column O).

B. WHAT OBSERVATIONS EMERGE FROM THE RESULTS OF THE 2014 RE-CERTIFICATION EFFORTS?

1. The 64,509 Lifeline subscribers required to be surveyed in 2014 remained about the same as the 63,302 Lifeline subscribers surveyed in 2013, down from the 72,327 Lifeline subscribers surveyed in 2012 Attachment1, Column E.
2. The 2014 overall de-enrollment rate of 35.8% was up from 16.5% in 2013, but down from 42.6% in 2012 (Attachment 1, Column O). The decline in 2013 reflected the lower de-enrollment rate of prepaid wireless ETCs. The de-enrollment rate of prepaid wireless ETC in 2014 was higher, and the number of Lifeline subscribers served by prepaid wireless ETC was also significantly higher in 2014 (see Sections IV.B.7 and IV.C.4 of these comments).
3. Non-response to ETCs' direct contact survey continues to be the largest factor in de-enrollments. The 20,640 or 35.3% (Attachment 1, Column H) of Lifeline subscribers that did not respond to being directly contacted by ETCs in 2014 was up from the 7,983 or 20.5% (Attachment 1, Column H) of Lifeline subscribers who did not respond in 2013, but down from 30,140 or 42.7% of Lifeline subscribers that did not respond in 2012 (Attachment 1, Column H).
4. ETCs that chose to use USAC to recertify their Lifeline subscribers in 2014 continued to experience a significantly higher de-enrollment rate of Lifeline subscribers than ETCs that chose to directly contact their Lifeline subscribers, with or without the use of the DHS database. The de-enrollment rate for ETCs that relied on USAC to recertify their Lifeline subscribers in 2014 was 56.7% compared to 56.8% in 2013, the first year that USAC was available to survey Lifeline subscribers, and 14.8% in 2012 (Attachment 2, Column O).
5. Combining DHS database verification with direct contact of Lifeline subscribers continues to produce the lowest percentage of Lifeline de-enrollments. The de-enrollment rate for ETCs that chose to contact directly their Lifeline subscribers after first submitting them to the DHS database for verification was 15.9%, up from 13.2% in 2013 (Attachment 3, Column O). Surveys that combined a data base review with the direct contact of Lifeline subscribers were not analyzed in 2012.

6. The de-enrollment rate for ETCs that directly contacted their Lifeline subscribers, excluding the Prepaid Wireless ETCs, but did not use the DHS database, was 27.5%, down from 28.5% in 2013 and 43.3% in 2012 (Attachment 4, Column O).
7. The Department considered the de-enrollment results of the prepaid wireless ETCs separately from other carriers who used the direct contact method. 2013 survey results indicated that of 20,269 Lifeline subscribers surveyed, 3287 or 16.2% were de-enrolled (Attachment 5, Column O). 2014 survey results indicate that of 42,534 (Attachment 5, Column M) Lifeline subscribers surveyed, 16,322 (Attachment 5, Column N) or 38.4% were de-enrolled (Attachment 5, Column O). The Prepaid Wireless ETCs' presence increased significantly from 40,219 Lifeline subscribers in 2013 (Attachment 5, Column A) to 75,852 Lifeline subscribers in 2014 (Attachment 5, Column A) or 63.6% of total Minnesota Lifeline subscribers required to be surveyed in 2014, up from 32.0% in 2013 (Attachment 5, Column E/Attachment 1, Column E).

C. *DEPARTMENT FINDINGS*

1. All ETCs have complied with the requirement to submit their re-certification 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. 14-20 after discussions to clarify misunderstandings in the data filed, as reflected on Attachment 1, were conducted between the ETCs and the Department.
2. ETCs that used USAC to recertify their Lifeline subscribers are barred from directly contacting Lifeline subscribers or another database, and were required to accept the recertification results obtained from USAC. Lifeline subscribers either who did not respond to USAC's inquiry, or who responded that they were ineligible, represented the highest percentage of de-enrollments compared to recertification efforts by either direct contact only or use of the DHS database and subsequent contact of Lifeline subscribers who did not appear on the DHS database. The 2014 de-enrollment rates for the various recertification procedures were:
 - a. USAC- 56.7% (Attachment 2, Column O)
 - b. DHS and direct contact- 15.9% (Attachment 3, Column O)
 - c. Direct contact only 27.5 % (excluding the Prepaid Wireless ETCs) (Attachment 4, Column O)
 - d. Prepaid Wireless ETCs 38.4% (Attachment 5, Column O)
3. ETCs were more adept at completing FCC Form 555 to report Lifeline recertification in 2014 as compared to their 2013 efforts, and few of the problems previously encountered were evident in the Department's review of the survey forms.
 - a. ETCs understand that when the DHS database is used to survey Lifeline subscribers, they must follow-up by direct contact with Lifeline subscribers whose names were not registered in qualifying programs. While Lifeline subscribers may not appear in the DHS data base check for enrollment in an approved low-income program, Lifeline subscribers may qualify for Lifeline

benefits if their income level is below 135 percent of the Federal Poverty Guidelines. Thus, subscribers not in the DHS database need to be contacted to verify eligibility.

- b. The form whereby ETCs report their recertification results can be confusing regarding the cut-off for subtracting Lifeline subscribers that were de-enrolled prior to the recertification attempt. A few ETCs interpret the instructions to include customers de-enrolled prior to their direct contact of Lifeline subscribers. Some ETC interpret the instruction to include customer de-enrollments until the list of Lifeline subscribers is submitted to USAC for its recertification attempt. Other ETCs base the Lifeline subscribers required to be surveyed on their February report to USAC. The Department has discussed this ambiguity with USAC so that clearer instructions might come with the 2015 FCC Form 555 survey form.
4. The presence of prepaid wireless ETCs greatly increased from 32.0% of Lifeline subscribers required to be surveyed in 2013 to 63.6% in 2014 (see Section IV.B.7 of these comments), and their de-enrollment experience also increased from 16.2% in 2013 to 38.4% in 2014 (Attachment 5, Column O), representing 68.9% of all de-enrollments (Attachment 5, Column N /Attachment 1, Column N).
 5. ETCs that used the DHS database to validate their Lifeline subscribers for eligibility had a lower de-enrollment rate by reducing the number of Lifeline subscribers needing a direct contact (see Section IV.B.5 of these comments).

V. COMMISSION ALTERNATIVES

1. Accept the Department's analysis regarding the ETC's 2014 Lifeline recertification surveys:
 - a. All ETCs have complied with the requirement to submit their re-recertification results to the Commission, and the re-certification results comply with required re-certification procedures.
 - b. To minimize de-enrollments, use of the DHS database is encouraged to validate eligible subscribers and reduce the number of Lifeline subscribers needing direct contact.
 - c. Order all ETC to file their 2015 FCC Form 555 Lifeline survey results by January 31, 2016.
2. Accept the Departments analysis regarding the ETC's 2014 Lifeline recertification surveys with modifications.
3. Reject the Departments analysis regarding the ETC's 2014 Lifeline recertification surveys.

VI. RECOMMENDATION

The Department recommends Alternative 1.

Accept the Department's analysis regarding the ETC's 2014 Lifeline recertification surveys:

- a. All ETCs have complied with the requirement to submit their re-recertification results to the Commission, and the re-certification results comply with required re-certification procedures.
- b. To minimize de-enrollments, use of the DHS database is encouraged to validate eligible subscribers and reduce the number of Lifeline subscribers needing direct contact.
- c. Order all ETC to file their 2015 FCC Form 555 Lifeline survey results by January 31, 2016.

/lt

ETC	FCC Form 497 (Feb 2014)	2014 ETC Lifeline Re-Certification Results Filed Data											# 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
		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 only or after data base check	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility data base or USAC			
Ace Telephone Association	201	0	0	13	188	188	163	25	7	32	0	0	188	32	17.02
Albany Mutual Telephone Association	64	0	33	0	31	0	0	0	0	0	31	19	31	19	61.29
Alliance ETC- (Hills)	21	0	5	2	14	14	13	1	0	1	0	0	14	1	7.14
Arrowhead Communications Corporation	20	0	0	11	9	0	0	0	0	0	9	6	9	6	66.67
Arvig Telephone Co.	258	0	4	26	228	228	179	49	0	49	0	0	228	49	21.49
City of Barnesville	41	0	0	0	41	41	41	0	0	0	0	0	41	0	0.00
Benton Coop Tel Co	70	0	0	9	61	61	49	12	0	12	0	0	61	12	19.67
Blue Earth Valley Telephone Co	216	0	0	5	211	51	35	16	0	16	160	0	211	16	7.58
Blue Jay Wireless LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Boomerang Wirless, LLC d/b/a enTouch Wireless	3802	0	4	2566	1232	1232	851	381	0	381	0	0	1232	381	30.93
Bridge Water Telephone Co.	75	0	1	9	65	65	46	19	0	19	0	0	65	19	29.23
Budget PrePay Inc.	11239	0	2794	4594	3851	3851	1663	2188	0	2188	0	0	3851	2188	56.82
C-I Communications	43	0	0	6	37	6	2	4	0	4	31	0	37	4	10.81
Callaway Telephone Company	9	0	0	0	9	0	0	0	0	0	9	6	9	6	66.67
Cannon Valley Telecom, Inc.	46	0	0	2	44	7	6	1	0	1	37	0	44	1	2.27
CenturyLink-Chester	3	0	1	0	2	2	2	0	0	0	0	0	2	0	0.00
CenturyLink-QC	14183	190	377	519	13097	13097	9231	3866	0	3866	0	0	13097	3866	29.52
CenturyLink-MN	402	0	17	21	364	364	270	94	0	94	0	0	364	94	25.82
CenturyLink-Embarq	903	0	27	39	837	837	634	203	0	203	0	0	837	203	24.25
CenturyLink-NW Wisc	321	0	4	3	314	129	56	73	0	73	185	0	314	73	23.25
Christensen Communications Company	24	0	0	6	18	18	16	2	0	2	0	0	18	2	11.11
Citizens Tel Co of MN LLC 367123	32	0	3	5	24	0	0	0	0	0	26	16	26	16	61.54
Citizens Tel Co of MN LLC 361123	1309	0	45	109	1155	0	0	0	0	0	1247	717	1247	717	57.50
Clara City Telephone Co	36	0	0	0	36	36	34	2	0	2	0	0	36	2	5.56
Clements Telephone Co.	2	0	0	0	2	0	0	0	0	0	2	2	2	2	100.00
Consolidated Tel Co	132	0	6	15	111	13	10	3	0	3	98	0	111	3	2.70
Crosslake Tel & Cablevision	18	0	0	0	18	18	18	0	0	0	0	0	18	0	0.00
Dunnell Tel Co, Inc.	1	0	1	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Eagle Valley Telephone Co	46	0	0	2	44	0	0	0	0	0	44	28	44	28	63.64
East Otter Tail Telephone Co	409	0	0	16	393	0	0	0	0	0	393	231	393	231	58.78
Easton Telephohe Company	23	0	0	5	18	1	0	1	0	1	17	0	18	1	5.56
Eckles Telephone Co	50	0	0	3	47	15	15	0	0	0	32	0	47	0	0.00
Emily Cooperative Tel	35	0	0	0	35	35	35	0	0	0	0	0	35	0	0.00
Farmers Mutual Tel (361389),	24	0	0	0	24	5	5	0	0	0	19	0	24	0	0.00
FederatedTelephone Coop (369021)	52	0	0	0	52	25	24	1	2	3	27	0	52	3	5.77
FederatedTelephone Coop (361390)	55	0	1	0	54	7	7	0	0	0	47	0	54	0	0.00
Felton Telephone Company	8	0	0	1	7	0	0	0	0	0	7	4	7	4	57.14
Frontier Communications of MN	878	0	35	87	756	0	0	0	0	0	811	455	811	455	56.10
Garden Valley Tel Co	294	0	0	42	252	26	20	6	4	10	226	0	252	10	3.97
Gardonville Coop Tel Assn	49	0	1	0	48	0	0	0	0	0	49	0	49	0	0.00

ETC	FCC Form 497 (Feb 2014)	2014 ETC Lifeline Re-Certification Results Filed Data											# 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		
		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 only or after data base check	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility data base or USAC					
		A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K				L	M M=(F+K)
Global Connection Inc of America	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Granada Telephone Co	5	0	0	0	5	1	1	0	0	0	4	0	5	0	0.00		
Halstad Telephone Company	18	0	0	0	18	0	0	0	0	0	18	0	18	0	0.00		
Harmony Telephone Company	33	0	0	5	28	8	8	0	0	0	20	0	28	0	0.00		
Home Telephone Co.	35	0	0	0	35	0	0	0	0	0	35	23	35	23	65.71		
Hutchinson Telephone Company	120	0	0	0	120	44	32	12	0	12	76	0	120	12	10.00		
I-Wireless LLC	4178	0	2096	1155	927	927	530	397	1	398	0	0	927	398	42.93		
Interstate Telecommunications	46	0	0	0	46	46	45	1	0	1	0	0	46	1	2.17		
Johnson Tel	129	0	4	13	112	112	105	7	3	10	0	0	112	10	8.93		
Kasson & Mantorville Tel Co	52	0	2	1	49	49	49	0	5	5	0	0	49	5	10.20		
KMP d/b/a Mid-State Tel Co.	3	0	0	0	3	3	3	0	0	0	0	0	3	0	0.00		
Lismore Coop Tel Co	4	0	0	0	4	4	4	0	0	0	0	0	4	0	0.00		
Lonsdale Tel	24	0	0	4	20	20	18	2	1	3	0	0	20	3	15.00		
Loretel Systems Inc.	145	0	0	3	142	0	0	0	0	0	142	77	142	77	54.23		
Mabel Coop Tel Co	30	0	0	0	30	30	27	3	0	3	0	0	30	3	10.00		
Manchester-hartland Telephone Co.	11	0	0	1	10	10	10	0	0	0	0	0	10	0	0.00		
Mankato Citizens Telephone Co	708	0	4	31	673	436	233	203	0	203	237	0	673	203	30.16		
Melrose Telephone Co.	250	0	0	7	243	0	0	0	0	0	243	137	243	137	56.38		
Mid-Communications, Inc.	201	0	0	22	179	98	38	60	0	60	81	0	179	60	33.52		
Mid-State Telephone Co.	158	0	2	17	139	139	109	30	3	33	0	0	139	33	23.74		
Midcontinent Communications	189	0	32	0	157	5	0	5	0	5	152	84	157	89	56.69		
Midwest Telephone Company	89	0	0	2	87	0	0	0	0	0	87	44	87	44	50.57		
Minnesota Valley Tel	9	0	0	0	9	9	8	1	1	2	0	0	9	2	22.22		
New Ulm Telecom	208	0	0	0	208	82	76	6	6	6	126	0	208	6	2.88		
Nexus Communications, Inc. dba Reachout Wireless	26		11		15	15	6	9	0	9	0	0	15	9	60.00		
Northern Tel Co	1	0	0	0	1	1	1	0	0	0	0	0	1	0	0.00		
Osakis Telephone Company	32	0	0	0	32	0	0	0	0	0	32	21	32	21	65.63		
Park Region Tel Co	24	0	5	7	12	12	7	5	0	5	0	0	12	5	41.67		
Paul Bunyan Rural Tel Co	397	0	0	51	346	346	275	71	7	78	0	0	346	78	22.54		
The Peoples Telephone Co. of Bigfork	41	0	0	1	40	0	0	0	0	0	40	19	40	19	47.50		
Pine Island Telephone Co	35	0	0	4	31	5	3	2	0	2	26	0	31	2	6.45		
Polar Telecommunications Inc. 381614	47	0	0	1	46	46	41	5	0	5	0	0	46	5	10.87		
Polar Communications Mutual Aid Corp. 381630	167	0	0	15	152	152	123	29	1	30	0	0	152	30	19.74		
Q Link Wireless LLC	4094	0	1019	885	2190	1422	1168	254	9	263	768	0	2190	263	12.01		
Red River Rural Telephone Assoc.	114	0	0	0	114	13	12	1	0	1	101	4	114	5	4.39		
Redwood County Telephone Co	34	0	0	2	32	0	0	0	0	0	32	14	32	14	43.75		
Rothsay Telephone Co.	11	0	2	1	8	12	11	1	2	3	0	0	12	3	25.00		
Runestone Telecom Assn- 361423	13	0	0	0	13	0	0	0	0	0	13	5	13	5	38.46		
Runestone Telecom Assn- 361475	108	0	0	0	108	0	0	0	0	0	108	64	108	64	59.26		

**2014 ETC Lifeline Re-Certification Results
Filed Data**

Attachment 1

ETC	FCC Form 497 (Feb 2014)	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	2014 ETC Lifeline Re-Certification Results					# of subscribers de-enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility 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
						# of subscribers contacted directly only or after data base check	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled						
						F	G	H	I	J						
	A	B	C	D	E E=(A-B-C-D)			H=(F-G)		J=(H+I)			M=(F+K)	N=(J+L)	O= ((N/M)*100)	
Sacred Heart Telephone Co	13	0	0	0	13	13	12	1	0	1	0	0	13	1	7.69	
Scott Rice Tel Co dba Integra Telecom	84	0	2	9	73	73	67	6	2	8	0	0	73	8	10.96	
Sleepy Eye Telephone Co	48	0	0	0	48	20	15	5	0	5	28	0	48	5	10.42	
Spring Grove Comm	58	0	0	7	51	13	12	1	1	2	38	0	51	2	3.92	
Starbuck Telephone Co	56	0	0	0	56	56	37	19	0	19	0	0	56	19	33.93	
T-Mobile Central LLC	157	0	31	2	124	124	89	35	0	35	0	0	124	35	28.23	
TAG Mobile LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	
Tekstar Communications Inc.	580	0	0	12	568	0	0	0	0	0	568	339	568	339	59.68	
Telrite Corporation d/b/a Life Wireless	22365	0	1058	8879	12428	12428	7738	4690	98	4788	0	0	12428	4788	38.53	
Tempo Telecom LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	
TerraCom, Inc.	5947	0	29	4804	1114	252	252	0	0	0	862	0	1114	0	0.00	
Total Call Mobile Inc.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	
Twin Valley-Ulen Telephone Co	173	0	0	7	166	0	0	0	0	0	166	94	166	94	56.63	
Upsala Coop Tel Assn	42	0	0	1	41	41	41	0	1	1	0	0	41	1	2.44	
Valley Tel Co	27	0	2	13	12	12	5	7	0	7	0	0	12	7	58.33	
Virgin Mobile USA, LP	23930	0	1211	3695	19024	20539	12777	7762	493	8255	0	0	20539	8255	40.19	
West Central Tel Assn.	83	0	1	5	77	77	62	15	2	17	0	0	77	17	22.08	
Western Telephone Company	53	0	0	0	53	22	19	3	0	3	31	0	53	3	5.66	
Wilderness Valley Tel Co	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00	
Wikstrom Tel	223	0	0	13	210	39	31	8	2	10	171	0	210	10	4.76	
Windstream-361414	211	0	6	23	182	182	166	16	0	16	0	0	182	16	8.79	
Windstream-361482	89	0	6	19	64	64	57	7	0	7	0	0	64	7	10.94	
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	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	
Winsted Telephone Co.	23	0	0	2	21	21	20	1	0	1	0	0	21	1	4.76	
Winthrop Tel	9	0	0	0	9	9	4	5	0	5	0	0	9	5	55.56	
Wolverton Telephone Co. (Polar Communications subsidiary 361512	3	0	0	0	3	3	1	2	0	2	0	0	3	2	66.67	
Woodstock Tel Co	30	0	1	6	23	23	23	0	1	1	0	0	23	1	4.35	
Zumbrota Telepoone Co	26	0	0	0	26	26	20	6	0	6	0	0	26	6	23.08	
					0	0	0	0	0	0	0	0	0	0	#DIV/0!	
2014 Totals	101425	190	8885	27841	64509	58458	37818	20640	646	21286	7720	2413	66178	23699	35.81	
2013	68081				63302	39002	31018	35.3%	641	8624	4803	1811	63302	10435	16.48	
2012	86891				72327	70615	30440	20.5%		30599	1712	253	72377	30852	42.63	
								42.7%		43.3%		14.8%				

2014 ETC Lifeline Re-Certification Results USAC Companies															
ETC	FCC Form 497 (Feb 2014)	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 only or after data base check	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility 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
	A	B	C	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)
Albany Mutual Telephone Association	64	0	33	0	31	0	0	0	0	0	31	19	31	19	61.29
Arrowhead Communications Corporation	20	0	0	11	9	0	0	0	0	0	9	6	9	6	66.67
Callaway Telephone Company	9	0	0	0	9	0	0	0	0	0	9	6	9	6	66.67
Citizens Tel Co of MN LLC 367123	32	0	3	5	24	0	0	0	0	0	26	16	26	16	61.54
Citizens Tel Co of MN LLC 361123	1309	0	45	109	1155	0	0	0	0	0	1247	717	1247	717	57.50
Clements Telephone Co.	2	0	0	0	2	0	0	0	0	0	2	2	2	2	100.00
Eagle Valley Telephone Co	46	0	0	2	44	0	0	0	0	0	44	28	44	28	63.64
East Otter Tail Telephone Co	409	0	0	16	393	0	0	0	0	0	393	231	393	231	58.78
Felton Telephone Company	8	0	0	1	7	0	0	0	0	0	7	4	7	4	57.14
Frontier Communications of MN	878	0	35	87	756	0	0	0	0	0	811	455	811	455	56.10
Halstad Telephone Company	18	0	0	0	18	0	0	0	0	0	18	0	18	0	0.00
Home Telephone Co.	35	0	0	0	35	0	0	0	0	0	35	23	35	23	65.71
Loretel Systems Inc.	145	0	0	3	142	0	0	0	0	0	142	77	142	77	54.23
Melrose Telephone Co.	250	0	0	7	243	0	0	0	0	0	243	137	243	137	56.38
Midcontinent Communications	189	0	32	0	157	5	0	5	0	5	152	84	157	89	56.69
Midwest Telephone Company	89	0	0	2	87	0	0	0	0	0	87	44	87	44	50.57
Osakis Telephone Company	32	0	0	0	32	0	0	0	0	0	32	21	32	21	65.63
Peoples Telephone Co. of Bigfork	41	0	0	1	40	0	0	0	0	0	40	19	40	19	47.50
Redwood County Telephone Co	34	0	0	2	32	0	0	0	0	0	32	14	32	14	43.75
Runestone Telecom Assn- 361423	13	0	0	0	13	0	0	0	0	0	13	5	13	5	38.46
Runestone Telecom Assn- 361475	108	0	0	0	108	0	0	0	0	0	108	64	108	64	59.26
Tekstar Communications Inc.	580	0	0	12	568	0	0	0	0	0	568	339	568	339	59.68
Twin Valley-Ulen Telephone Co	173	0	0	7	166	0	0	0	0	0	166	94	166	94	56.63
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	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Totals	4494	0	150	265	4079	5	0	5	0	5	4223	2409	4228	2414	
2014 Results	3729	0	81	0	3648	5	5	0	0	0	3162	1796	3167	1796	56.71
2013													3162	1796	56.80
2012													1712	253	14.78

ETC	FCC Form 497 (Feb 2014)	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	2014 ETC Lifeline Re-Certification Results Non-USAC data base & Direct Contact Companies					# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility 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
						# of subscribers contacted directly only or after data base check	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled					
						F	G	H	I	J					
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)
Ace Telephone Association	201	0	0	13	188	188	163	25	7	32	0	0	188	32	17.02
Blue Earth Valley Telephone Co	216	0	0	5	211	51	35	16	0	16	160	0	211	16	7.58
C-I Communications	43	0	0	6	37	6	2	4	0	4	31	0	37	4	10.81
Cannon Valley Telecom, Inc.	46	0	0	2	44	7	6	1	0	1	37	0	44	1	2.27
CenturyLink-NW Wisc	321	0	4	3	314	129	56	73	0	73	185	0	314	73	23.25
Consolidated Tel Co	132	0	6	15	111	13	10	3	0	3	98	0	111	3	2.70
Easton Telephone Company	23	0	0	5	18	1	0	1	0	1	17	0	18	1	5.56
Eckles Telephone Co	50	0	0	3	47	15	15	0	0	0	32	0	47	0	0.00
Farmers Mutual Tel (361389),	24	0	0	0	24	5	5	0	0	0	19	0	24	0	0.00
Garden Valley Tel Co	294	0	0	42	252	26	20	6	4	10	226	0	252	10	3.97
Gardonville Coop Tel Assn	49	0	1	0	48	0	0	0	0	0	49	0	49	0	0.00
Granada Telephone Co	5	0	0	0	5	1	1	0	0	0	4	0	5	0	0.00
Harmony Telephone Company	33	0	0	5	28	8	8	0	0	0	20	0	28	0	0.00
Hutchinson Telephone Company	120	0	0	0	120	44	32	12	0	12	76	0	120	12	10.00
Mankato Citizens Telephone Co	708	0	4	31	673	436	233	203	0	203	237	0	673	203	30.16
Mid-Communications, Inc.	201	0	0	22	179	98	38	60	0	60	81	0	179	60	33.52
New Ulm Telecom	208	0	0	0	208	82	76	6		6	126	0	208	6	2.88
Nexus Communications, Inc. dba															
Reachout Wireless	26		11		15	15	6	9	0	9	0	0	15	9	60.00
Northern Tel Co	1	0	0	0	1	1	1	0	0	0	0	0	1	0	0.00
Osakis Telephone Company	32	0	0	0	32	0	0	0	0	0	32	21	32	21	65.63
Pine Island Telephone Co	35	0	0	4	31	5	3	2	0	2	26	0	31	2	6.45
Red River Rural Telephone Assoc.	114	0	0	0	114	13	12	1	0	1	101	4	114	5	4.39
Sleepy Eye Telephone Co	48	0	0	0	48	20	15	5	0	5	28	0	48	5	10.42
Spring Grove Comm	58	0	0	7	51	13	12	1	1	2	38	0	51	2	3.92
Wikstrom Tel	223	0	0	13	210	39	31	8	2	10	171	0	210	10	4.76
Winsted Telephone Co.	23	0	0	2	21	21	20	1	0	1	0	0	21	1	4.76
Winthrop Tel	9	0	0	0	9	9	4	5	0	5	0	0	9	5	55.56
Wolverton Telephone Co.	3	0	0	0	3	3	1	2	0	2	0	0	3	2	66.67
					0			0		0			0	0	#DIV/0!
2014 Totals	3246	0	26	178	3042	1249	805	444	14	458	1794	25	3043	483	15.87
2013 Results	2771		150		2621								2942	387	13.15

2014 ETC Lifeline Re-Certification Results															
Direct Contact Only Companies															
ETC	FCC Form 497 (Feb 2014)	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 only or after data base check	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility 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
	A	B	C	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)
Ace Telephone Association	201	0	0	13	188	188	163	25	7	32	0	0	188	32	17.02
Alliance ETC- (Hills)	21	0	5	2	14	14	13	1	0	1	0	0	14	1	7.14
Arvig Telephone Co.	258	0	4	26	228	228	179	49	0	49	0	0	228	49	21.49
City of Barnesville	41	0	0	0	41	41	41	0	0	0	0	0	41	0	0.00
Benton Coop Tel Co	70	0	0	9	61	61	49	12	0	12	0	0	61	12	19.67
Bridge Water Telephone Co.	75	0	1	9	65	65	46	19	0	19	0	0	65	19	29.23
CenturyLink-Chester	3	0	1	0	2	2	2	0	0	0	0	0	2	0	0.00
CenturyLink-QC	14183	190	377	519	13097	13097	9231	3866	0	3866	0	0	13097	3866	29.52
CenturyLink-MN	402	0	17	21	364	364	270	94	0	94	0	0	364	94	25.82
CenturyLink-Embarq	903	0	27	39	837	837	634	203	0	203	0	0	837	203	24.25
Christensen Communications Company	24	0	0	6	18	18	16	2	0	2	0	0	18	2	11.11
Clara City Telephone Co	36	0	0	0	36	36	34	2	0	2	0	0	36	2	5.56
Crosslake Tel & Cablevision	18	0	0	0	18	18	18	0	0	0	0	0	18	0	0.00
Dunnell Tel Co, Inc.	1	0	1	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Emily Cooperative Tel	35	0	0	0	35	35	35	0	0	0	0	0	35	0	0.00
Interstate Telecommunications Johnson Tel	46	0	0	0	46	46	45	1	0	1	0	0	46	1	2.17
KMP d/b/a Mid-State Tel Co.	129	0	4	13	112	112	105	7	3	10	0	0	112	10	8.93
Kasson & Mantorville Tel Co	3	0	0	0	3	3	3	0	0	0	0	0	3	0	0.00
Kasson & Mantorville Tel Co	52	0	2	1	49	49	49	0	5	5	0	0	49	5	10.20
Lismore Coop Tel Co	4	0	0	0	4	4	4	0	0	0	0	0	4	0	0.00
Lonsdale Tel	24	0	0	4	20	20	18	2	1	3	0	0	20	3	15.00
Mabel Coop Tel Co	30	0	0	0	30	30	27	3	0	3	0	0	30	3	10.00
Manchester-hartland Telephone Co.	11	0	0	1	10	10	10	0	0	0	0	0	10	0	0.00
Mid-State Telephone Co.	158	0	2	17	139	139	109	30	3	33	0	0	139	33	23.74
Minnesota Valley Tel	9	0	0	0	9	9	8	1	1	2	0	0	9	2	22.22
Northern Tel Co	1	0	0	0	1	1	1	0	0	0	0	0	1	0	0.00
Osakis Telephone Company	32	0	0	0	32	0	0	0	0	0	32	21	32	21	65.63
Park Region Tel Co	24	0	5	7	12	12	7	5	0	5	0	0	12	5	41.67
Paul Bunyan Rural Tel Co	397	0	0	51	346	346	275	71	7	78	0	0	346	78	22.54
Polar Telecommunications Inc. 381614	47	0	0	1	46	46	41	5	0	5	0	0	46	5	10.87
Polar Communications Mutual Aid Corp. 381630	167	0	0	15	152	152	123	29	1	30	0	0	152	30	19.74
Rothsay Telephone Co.	11	0	2	1	8	12	11	1	2	3	0	0	12	3	25.00
Sacred Heart Telephone Co	13	0	0	0	13	13	12	1	0	1	0	0	13	1	7.69
Scott Rice Tel Co dba Integra Telecom	84	0	2	9	73	73	67	6	2	8	0	0	73	8	10.96
Starbuck Telephoone Co	56	0	0	0	56	56	37	19	0	19	0	0	56	19	33.93
Upsala Coop Tel Assn	42	0	0	1	41	41	41	0	1	1	0	0	41	1	2.44
Valley Tel Co	27	0	2	13	12	12	5	7	0	7	0	0	12	7	58.33
West Central Tel Assn.	83	0	1	5	77	77	62	15	2	17	0	0	77	17	22.08
Wilderness Valley Tel Co	2	0	0	0	2	2	2	0	0	0	0	0	2	0	0.00
Windstream-361414	211	0	6	23	182	182	166	16	0	16	0	0	182	16	8.79

ETC	FCC Form 497 (Feb 2014)	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	2014 ETC Lifeline Re-Certification Results Direct Contact Only Companies					# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility 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
						# of subscribers contacted directly only or after data base check	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled					
	A	B	C	D	E E=(A-B-C-D)	F	G	H H=(F-G)	I	J J=(H+I)	K	L	M	N	O
Windstream-361482	89	0	6	19	64	64	57	7	0	7	0	0	64	7	10.94
Winthrop Tel	9	0	0	0	9	9	4	5	0	5	0	0	9	5	55.56
Wolverton Telephone Co. (Polar Communications subsidiary 361512	3	0	0	0	3	3	1	2	0	2	0	0	3	2	66.67
Woodstock Tel Co	30	0	1	6	23	23	23	0	1	1	0	0	23	1	4.35
Zumbrota Telepoone Co	26	0	0	0	26	26	20	6	0	6	0	0	26	6	23.08
					0	0	0	0	0	0			0	0	#DIV/0!
Totals	18091	190	466	831	16604	16576	12064	4512	36	4548	32	21	16608	4569	27.51
2013 Results						17427				4965					28.49%
2012 Results						70615				30599					43.33%

ETC	FCC Form 497 (Feb 2014)	2014 ETC Lifeline Re-Certification Results Wireless Companies													
		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 only or after data base check	# of responding subscribers	# of non- responding subscribers	# of ineligible responding subscribers	# of subscribers de- enrolled	# of subscribers reviewed by state, eligibility data base or USAC	# of subscribers de-enrolled by state, eligibility 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
													M= 0	N= 0	O= #DIV/0!
	A	B	C	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)
Blue Jay Wireless LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Boomerang Wireless, LLC d/b/a enTouch Wireless	3802	0	4	2566	1232	1232	851	381	0	381	0	0	1232	381	30.93
Budget PrePay Inc.	11239	0	2794	4594	3851	3851	1663	2188	0	2188	0	0	3851	2188	56.82
Global Connection Inc of America	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
I-Wireless LLC	4178	0	2096	1155	927	927	530	397	1	398	0	0	927	398	42.93
Nexus Communications, Inc. dba Reachout Wireless	26		11		15	15	6	9	0	9	0	0	15	9	60.00
Q Link Wireless LLC	4094	0	1019	885	2190	1422	1168	254	9	263	768	0	2190	263	12.01
Red River Rural Telephone Assoc.	114	0	0	0	114	13	12	1	0	1	101	4	114	5	4.39
T-Mobile Central LLC	157	0	31	2	124	124	89	35	0	35	0	0	124	35	28.23
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	22365	0	1058	8879	12428	12428	7738	4690	98	4788	0	0	12428	4788	38.53
Tempo Telecom LLC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
TerraCom, Inc.	5947		29	4804	1114	252	252	0	0	0	862	0	1114	0	0.00
Total Call Mobile Inc.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!
Virgin Mobile USA, LP	23930	0	1211	3695	19024	20539	12777	7762	493	8255	0	0	20539	8255	40.19
					0			0		0			0	0	#DIV/0!
2014 Totals	75852	0	8253	26580	41019	40803	25086	15717	601	16318	1731	4	42534	16322	38.37
2013 Results	40219	0	1535	18442	20242	20269	17351	2918	369	3287	0	0	20269	3287	16.22

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-15-20

Dated this **1st** day of **April 2015**

/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.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-20_PR-15-20
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_15-20_PR-15-20
John	Lindell	agorud.ecf@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_15-20_PR-15-20
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_15-20_PR-15-20

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jeffrey	Ansted	JAnsted@ambt.net	American Broadband and Telecommunications Company	One Seagate Toledo, OH 43604	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Issa	Asad	issa@QuadrantHoldings.com	Q Link Wireless LLC	499 E Sheridan St Ste 400 Dania Beach, FL 33004	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Sam	Bailey	Sam.Bailey@iwirelesshome.com	i-Wireless	1 Levee Way Ste 3104 Newport, KY 41071	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jim	Beattie	N/A	Eckles Telephone Company dba BEVCOMM	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jim	Beattie	N/A	Pine Island Telephone Company dba BEVCOMM	123 W 7th St Blue Earth, MN 56013	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jim	Beattie	N/A	Easton Telephone Co. dba BEVCOMM	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jim	Beattie	N/A	Cannon Valley Telecom, Inc.	123 W 7th St Blue Earth, MN 56013	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jim	Beattie	N/A	Blue Earth Valley Telephone Co.	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jim	Beattie	N/A	Granada Telephone Company dba BEVCOMM	123 W 7th St. Blue Earth, MN 56013	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Bickett		Park Region Mutual Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC

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_SL__SPL_SL__ETC List-DOC-PUC
Mark	Birkholz	N/A	Clements Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Mark	Birkholz	N/A	Home Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Mark	Birkholz	N/A	Osakis Telephone	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Mark	Birkholz	N/A	Melrose Telephone Company	150 Second St. SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Kathy	Boutwell	kathyb@chriscomco.net	Christensen Communications Co	104 Main Street West Madelia, MN 56062	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Danny	Busche	dannyb@means.net	Minnesota Valley Telephone Company	318 Second Ave East P O Box 310 Franklin, MN 55333-0310	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Calderon	mary.calderon@tagmobile.com	Tag Mobile, L.L.C.	1330 Capital Pkwy Carrollton, Texas 75006	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Elaine	Divelbliss	elaine.Divelbliss@virginmobileusa.com	Virgin Mobile USA, L.P.	10 Independence Blvd Warren, NJ 07059	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Melissa	Driskell	melissa.driskell@telrite.com	Telrite Corporation	4113 Monticello St Covington, GA 30014	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David L.	Dunning	N/A	Wolverton Telephone Company	PO Box 270 Park River, ND 58270	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
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_SL__SPL_SL__ETC List-DOC-PUC
Donna	Eul	donnaeul@fedtel.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Kristen	Farole	kfarole@terracominc.com	TerraCom, Inc.	401 E Memorial Rd Ste 400 Oklahoma City, OK 73114	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Erin	Feikema	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd AvePO Box 127 Lismore, MN 56155	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd Columbus, OH 43231-5931	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Shari	Flanders	sflanders@polartel.com	Polar Communications	PO Box 270 Park River, ND 58270	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
William	Haas	N/A	T-Mobile Central, LLC	601 Pennsylvania Av. NW Ste 800 Washington, DC 20004-2710	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Bruce	Hanson	N/A	Clara City Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1700 Technology Dr Ste 100 Willmar, MN 56201	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
JoAnn	Hanson	joann.hanson@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Bruce	Hanson	N/A	Starbuck Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Bruce	Hanson	N/A	Zumbrota Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Donna	Heaston	Donna.Heaston@IntegraTelecom.com	Integra Telecom of MN, Inc	6160 Golden Hills Drive Golden Valley, MN 55416	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jerry	Heiberger	jerry.heiberger@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Paul	Hoge	phoge@crosslake.net	Crosslake Communications	35910 County Road 66 PO Box 70 Crosslake, MN 56442	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Dwayne	Johnson	jtcbusiness@means.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
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_SL__SPL_SL__ETC List-DOC-PUC
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Nathan	Law	nathaniell@totalcallusa.com	Total Call Mobile, Inc	1411 W 190th St Ste 650 Gardena, CA 90248	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Mary	Lohnes	mary_lohnes@mmi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_SL__SPL_SL__ETC List-DOC-PUC
Lee	Maier	lee@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Tom	Maroney	tmaroney@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Monty	Morrow	montymorrow@nu- telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Daniel C.	Nelson	dcndtc@bevcomm.net	Dunnell Telephone Company, Inc.	PO Box 42 110 N Seeley Ave Dunnell, MN 56127	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Lyndall	Nipps	lyndall.nipps@windstream. com	Windstream	655 W. Broadway, Ste. 850 San Diego, CA 92101	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Robert	Olson	rolson@emily.net	Emily Cooperative Telephone Company	PO Box 100 Emily, MN 564470100	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Craig	Otterness	otter@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Jean	Pauk	jean.pauk@tdstelecom.co m	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Kris	Rademacher	krisr@farmerstel.net	Farmers Mutual Telephone Co.	301 2nd St S Bellingham, MN 562120369	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Julia	Redman Carter	jrcarter@readywireless.com	Boomerang Wireless LLC	955 Kacena Rd Ste A Hiawatha, IA 52233	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Carrie	Rice	Carrie.Rice@eventis.com	Eventis Telecom, Inc.	221 E Hickory St Mankato, MN 56001-3610	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Robert	Riddell		Wilderness Valley Telephone Co. Inc.	13448 Co. Rd. 25 Wawina, MN 557369721	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25 Wawina, MN 557369721	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Mark	Roach	mark.roach@ctctelcom.net	Consolidated Telephone Company	1102 Madison Street PO Box 972 Brainerd, MN 56401	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Schornack	N/A	Arrowhead Communications Corporation	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Schornack	N/A	Twin Valley-Ulen Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Schornack	N/A	Felton Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Schornack	N/A	The Peoples Telephone Company of Bigfork	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Schornack	N/A	East Otter Tail Telephone Company	150 2nd Street SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Schornack	N/A	Callaway Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Schornack	N/A	Loretel Systems, Inc.	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 126 South Main Street Lonsdale, MN 55046-0358	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Gregory	Springer	greg.springer@ctctel.com	C-I Communications, Inc.	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Wayne	Stowman	wstowman@rtelnet.net	Rothsay Telephone Company	137 1st St NW Rothsay, MN 56579	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East Cedar P.O. Box 360 Houston, MN 559430360	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Lorren	Tingesdal	lorren@mabeltel.coop	Harmony Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277 Upsala, MN 56384	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Wareikis	dwareikis@bluejaywireless.com	Blue Jay Wireless, LLC	5010 Addison Circle Addison, TX 75001	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
David	Wolf	dwolf@gctel.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Robert	Yap	roberty@totalcallusa.com	Total Call Mobile, Inc.	1411 W. 190th St., Suite 650 Gardena, CA 90248	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC
Lezlie	Young	lezlie.p.young@windstream.com	Talk America Inc.	4001 N. Rodney Parham Rd. Little Rock, AR 72212	Electronic Service	No	SPL_SL__SPL_SL__ETC List-DOC-PUC