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July 1, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St Paul Minnesota 55101-2147

RE: **Reply Comments of the Minnesota Department of Commerce**
Docket No. P999/R-13-459

Dear Dr. Haar:

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

Possible Amendment to Rules Concerning White Pages Directory Publication and Distribution.

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

Sincerely,

/s/ DIANE DIETZ
Rate Analyst

/s/ KATHERINE DOHERTY
Rate Analyst

KD/DD/lt
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

REPLY COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. P999/R-13-459

I. BACKGROUND

On October 11, 2013, the Minnesota Public Utilities Commission (Commission) issued a notice of comments period on amendments to the rules governing the publication and distribution of white pages directories in Minn. Rules pts. 7810.2900, 7811.0600, and 7812.0600.

On December 5 through 6, 2013, the following parties filed comments in the current docket: the Minnesota Pollution Control Agency, Minnesota Cable Communications Association, Pinnacle Publishing, LLC, Product Stewardship Institute, CenturyLink, Citizens Telecommunications Company of Minnesota, LLC and Frontier Communications of Minnesota, Inc., Minnesota Telecom Alliance, Dex Media East, Minnesota Telecom alliance and the Department of Commerce.

On June 10, 2014, the Commission issued a Notice of Comment Period on Possible Rule Amendments.

II. REPLY COMMENTS

A. *MINN. RULES PT. 7810.0100, SUBP. 26A. LOCAL SERVICE PROVIDER*

The Commission proposes to introduce the following definition for “Local Service Provider” in Minn. Rules pt. 7810.0100 (Definitions), subp. 26a:

“Local Service Provider” or “LSP” means a telephone company or telecommunications carrier providing local service in Minnesota pursuant to a certificate of authority granted by the commission. Local service provider includes both local exchange carriers and competitive local exchange carriers.

In its December 6, 2013 comments, the Department recommended using the term “Local Exchange Carrier” instead of “Local Service Provider” as proposed by the Commission.

“Local Exchange Carrier” is defined in Minn. Stat. section 237.01, subd. 8 as “a telephone company or telecommunications carrier providing local exchange service.” Minn. Stat. section 237.01, subd. 6 further defines “telecommunications carrier” as a “person, firm, association, or corporation authorized to furnish” . . . local service.” It appears that the Commission intends for the term “Local Service Provider,” as used in Minn. Rules pt. 7810.0100, subp. 26a, to carry the same meaning as that of “Local Exchange Carrier” in Minn. Stat. section 237.01, subd. 8. Use of the term “Local Exchange Carrier” in place of the term “Local Service Provider” in Minn. Rules pt. 7810.0100, subp. 8 would avoid the potential for carriers to draw a distinction between the two terms in an attempt carve out a segment of the market, for regulated local services, that is not subject to the Commission’s directory rules.

B. MINN. RULES PT. 7810.2900, SUBP. 1 FORMAT, CONTENT AND DISTRIBUTION OF DIRECTORIES: BASIC REQUIREMENTS.

The Commission proposes to introduce a rule describing the basic service requirements for directories in Minn. Rules pt. 7810.2900, subp. 1, which states (in part):

Telephone directories shall be regularly compiled and shall contain each customer’s name, telephone number, and, if practical, address, except they shall not contain non-published telephone numbers . . .

The Department continues to recommend that a minor revision be made to Minn. Rules pt. 7810.2900, subp. 1 to replace the word “compiled” with the phrase “compiled and published.” As the Department stated in its December 6, 2013 comments, “it is not only necessary to regularly compile (*i.e.*, collect and gather data) directory listings, but also to publish (*i.e.*, to prepare and issue material for public distribution) the updated listings. Telephone directories are most useful when they are regularly published with up-to-date information.”¹ The need for both compiling and publishing the updated listings is applicable to both electronic directories as well as printed directories.

C. MINN. RULES PT. 7810.2900, SUBP. 2 FORMAT, CONTENT AND DISTRIBUTION OF DIRECTORIES: PRINTED DIRECTORIES

The Commission proposes to revise the requirements for printed directories in Minn. Rules pt. 7810.2900, subp. 2 as follows:

¹ December 6, 2013 Comments of the Minnesota Department of Commerce in Docket P999/R-13-459, page 3.

Printed directories shall:

- A. display on the front cover the name of the local service provider, the area included in the directory, and the year and month of issue;
- B. display in the front portion of the directory information pertaining to emergency calls, including information for police and fire departments; and
- C. contain instructions, appropriate to the area served by the directory, concerning placing local and long distance calls, calls to repair and directory assistance services, calls to local, state, and federal government offices, and the location of telephone company business offices.

In its December 6, 2013 comments, the Department recommended the following addition to the requirements:

- D. display on the front cover the availability of, and how to access, any electronic complete directory for residential and/or business listings.

The Department continues to recommend the addition of the provision in the proposed Part D., above. In the absence of the proposed regulatory provision in Part D., it is left to chance whether each carrier will prominently display the instructions for how to access that particular electronically published directory, which complies with the rules in Minn. Rules Ch. 7810. To the extent a carrier chooses not to prominently display the instructions on how to access the electronically published directory that is compliant with the applicable regulations, subscribers may be frustrated in their attempts to access an electronically published directory that is fully compliant with the Commission's rules.

Minn. Rules pt. 7820.2900, subp. 3 begins by stating that the Commission's directory listing rules apply to "any" electronic directory to which a local service provider directs its customers. The Department recommends that a Statement of Need and Reasonableness, in the current rulemaking proceeding, clarify that this phrase means that the proposed directory listing rules apply to any and every electronically published directory to which a local service provider directs its customers. Such a clarification may serve to avoid potential conflict after the rulemaking proceeding is completed.

The Department notes that the term "local service provider" is used in the proposed language and that the Department's concerns with the use of this term are discussed in Section I.A of these reply comments.

The Department continues to recommend that Minn. Rules pt. 7810.2900, subp. 3 B include the following text: "Display information pertaining to emergency calls including information for police and fire departments, in a prominent location." Emphasis added. While it is not necessary to require customers to be inconvenienced by having to navigate through emergency contact information if they simply want to reach residential or business

listings, providing access to emergency contact information “in a prominent location” on the website will serve the important public interest in streamlining access to emergency responders.

E. MINN. RULES PT. 7810.2950 DIRECTORIES,: CUSTOMER OPTION, SUBP. 1, CUSTOMER OPTION

The Commission proposes to introduce the following requirements for optional distribution of directories in Minn. Rules pt. 7810.2950, subp. 1:

Local Service Providers may publish printed or electronic directories, or some combination thereof. Local service providers that do not make an electronic directory available shall distribute a printed directory to each customer, except where an offer is made and explicitly refused by the customer. Local Service Providers that make an electronic directory available must deliver a printed directory if that is the customer’s format preference. Local service providers offering an electronic directory in lieu of any portion of a printed directory shall provide each customer a complete directory, and shall:

- A. present customers an opportunity to establish a directory format preference;
- B. permit customers to establish or change their directory format preference at any time;
- C. notify customers how they can change their directory format preference no less frequently than updated print directories are issued;
- D. not require customers to divulge any personally identifiable information other than their name and delivery address in order to request a complete directory that is printed or contained on a portable physical medium;
- E. not require users to create an account, log in, or otherwise provide any personally identifiable information in order to access an electronic directory; and
- F. not obtain, use, or retain any personally identifiable information from customer use of or request for a directory, except for the limited purpose of providing a directory in the format requested.

In its December 6, 2013 comments, the Department stressed the importance of enabling customers to make an informed choice while ensuring that the process does not result in the development of a customer list that has the potential to be used for purposes not intended by the customer. “The privacy of consumers can be better achieved if a list of customer’s directory preference is not required. Further, to obtain a directory, the customer should not be required to provide any information other than an address for delivery of the printed directory or other portable physical media. The customer name, telephone number, etc. serves no purpose other than to create a list that may be used for marketing purposes.” The proposed language for Minn. Rules pt. 7810.2950, subp. 1 continues to provide for the collection of information that does not serve the customers’ interest in accessing electronic

or printed directory listings, but merely creates the potential for the creation of a list of customers' directory preference that can be used for marketing purposes.

For this reason, the Department recommends the Commission adopt the following language for Minn. Rules pt. 7810.2950, subp. 1:

A local exchange carrier may publish printed or electronic directories, or some combination thereof. Local exchange carriers that do not intend to electronically publish directories shall distribute a printed directory to each customer, except where explicitly refused by the customer. A local exchange carrier that publishes a complete electronic directory shall, upon issuance of a new directory, provide notice to customers of the availability of an electronic directory and instructions on how it may be accessed, and that a printed directory is available upon request. A local exchange carrier that publishes an electronic directory must deliver a printed directory if requested by the customer. Local exchange carriers shall make available a complete directory to each customer, and shall:

- A. Not require customers to divulge any personally identifiable information, other than their delivery address, in order to request a complete directory that is printed or contained on portable physical media.
- B. Not require consumers to create an account, log in, or otherwise provide any personally identifiable information in order to access an electronic complete directory.
- C. Not obtain, use or retain any personally identifiable information as a result of customer use of any electronic complete directory.

E. MINN. RULES PT. 7810.2950 DIRECTORIES: CUSTOMER OPTION, SUBP. 2, WHEN NO CUSTOMER OPTION IS SPECIFIED

The Commission proposes to introduce the following requirements for distribution of directories when the customer does not specify an option in Minn. Rules pt. 7810.2950, subp. 1:

Local service providers shall determine whether customers who do not state a directory format preference will receive a printed directory, have access to an electronically published directory, or a combination thereof. Local service providers shall notify customers how the complete directory will be provided, including how to access any electronically published portion.

There is no need for the language in Minn. Rules pt. 7810.2950, subp. 2 if the Commission accepts the Department's recommendations for Minn. Rules pt. 7810.2950, subp. 1. The goal of maintaining the privacy of customers can best be achieved if carriers are directed not to maintain a list of the directory preferences of their customers.

*F. MINN. RULES PT. 7811.0600 AND 7812.0600 BASIC SERVICE REQUIREMENTS,
SUBPTS. 1.F REQUIRED SERVICES*

The Commission proposes the following revisions to the basic service requirements applicable to local exchange carriers in Minn. Rules pts. 7811.0600 and 7812.0600, subps. 1F:

One complete directory per year, which may include more than one local calling area, consistent with the customer option provisions of part 7810.2950 and, upon a customer request and in the customer's preferred format, one copy of any other directory within the local calling area;

The Department recommends the following language for Minn. Rules pts. 7811.0600 and 7812.0600, subps. 1F:

One complete directory per year, which may include more than one local calling area, consistent with the customer option provisions of part 7810.2950 and, upon a customer request, one copy of any other directory within the local calling area. Directories may be in portable physical electronic media unless the customer indicates a preference for printed media or the carrier does not offer portable physical electronic media. [Emphasis added.]

The Department's proposed rule language provides a relatively more environmentally conscious and cost effective means for distributing directories.

/lt

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
Reply Comments**

Docket No. P999/R-13-459

Dated this 1st day of July 2014

/s/Sharon Ferguson

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-------------------------------|------------------------------------|--|--------------------|-------------------|--|
| Mike | Allentoff | | Global Crossing | 225 Kenneth Dr. Rochester, NY 14623-4277 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| 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 | No | OFF_SL_13-459_R-13-459 Service List |
| Kristine | Anderson | kanderson@jagcom.net | Jaguar Communications, Inc. | 213 S Oak Ave Ste 2000 Owatonna, MN 55060 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mark J. | Angell | | Angell And Associates | 1075 Rosewood Drive Grapevine, TX 76051 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Deborah S. | Arnott | | IG2, Inc. | 5018 196th Street Fresh Meadows, NY 113651319 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| James | Beattie | jbeattie@bevcomm.com | Rural Communications Holding Corp. | 123 W 7th Street Blue Earth, MN 56013 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Dirk | Berger | dberger@bevcomm.com | BEVCOMM Eckles Telephone Company | 115 Main Street W. New Prague, MN 56071 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Kevin | Beyer | mnpucnotices@fedtel.net | Federated Telephone Cooperative | 405 2nd Street East PO Box 156 Chokio, MN 56221 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| David | Bickett | | Park Region Mutual Telephone Co. | PO Box 277 100 Main Street Underwood, MN 56586 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| David | Bickett | | Valley Telephone Co. | PO Box 277 100 Main Street Underwood, MN 56586 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mark | Birkholz | N/A | Clements Telephone Company | 150 2nd St. SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|--------------|---------------------------------|-------------------------------------|--|--------------------|-------------------|--|
| Mark | Birkholz | N/A | Peoples Telephone Company | 150 2nd St. SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mark | Birkholz | N/A | Home Telephone Company | 150 2nd St. SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mark | Birkholz | N/A | Mainstreet Communications, LLC | 150 Second St. SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mark | Birkholz | N/A | Osakis Telephone | 150 2nd St. SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mark | Birkholz | N/A | Melrose Telephone Company | 150 Second St. SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mark | Birkholz | N/A | Redwood County Telephone Company | 160 Second Avenue SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Nancy | Blankenhagen | nancyblankenhagen@nu-telcom.net | New Ulm Telecom Inc. | P.O. Box 697 27 N. Minnesota Street New Ulm, MN 560730697 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Scott | Bohler | scott.bohler@ftr.com | Frontier Communications Corporation | 2378 Wilshire Blvd Mound, MN 55364-1652 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mark B. | Bring | mbring@otpc.com | Otter Tail Power Company | 215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Tim | Brinkman | tim.brinkman@parkregion.com | Park Region Mutual Telephone Co. | 100 Main Street PO Box 277 Underwood, MN 56586 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-------------------------------|--|---|--------------------|-------------------|--|
| Diane | Browning | diane.c.browning@sprint.com | Sprint Corporation | KSOPHN0314-3A459 6450 Sprint Pkwy Overland Park, KS 66251 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Danny | Busche | dannyb@means.net | Minnesota Valley Telephone Company | 318 Second Ave East P O Box 310 Franklin, MN 55333-0310 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Lance | Casey | lance.casey@consolidated.com | Consolidated Communications | N/A | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| 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_13-459_R-13-459 Service List |
| Olson | Chris | wcphone@wcta.net | West Central Telephone Assoc. | P.O. Box 304 308 Frontage Road Sebeka, MN 56477 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Cathy | Clucas | cathy.clucas@centurylink.com | CenturyLink | 200 South 5th St Room 2300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Regulatory | Contact | wci.regulatory@windstream.com | Windstream Communications, Inc. | 600 Willowbrook Office Park Fairport, NY 14450 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Rod | Cox | rod.cox@tdsmetro.com | TDS Metrocom | Suite 6000 525 Junction Road Madison, WI 53717 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Louie | DeCarlo | bademaiouie.decarlo@mci.com | MCImetro Access Transmission Services | 9th Floor 201 Spear Street San Francisco, CA 94105 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Daryl | Ecker | daryl.ecker@parkregion.com | Park Region Mutual Telephone Co. | P.O. Box 277 Underwood, MN 56586 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|--------------|-----------|----------------------------|------------------------------------|---|--------------------|-------------------|--|
| Mark | Erickson | | City Of Lakefield | 301 Main Street PO Box 1023 Lakefield, MN 561500900 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Christianson | Farms | | | RR 2 Miltona, MN 56354 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jeffrey | Feldman | jfeldman@everestv.com | FTTH Communications L.L.C. | c/o EveresTV Two Executive Drive, Ste 635 Fort Lee, NJ 07024 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| George | Fish | gfish@gvtel.com | Garden Valley Telephone Company | PO Box 259 201 Ross Ave Erskine, MN 56535-0259 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Charles | Forst | charles.forst@zayo.com | Zayo Group, LLC | 400 Centennial Pkwy Ste 200 Louisville, CO 80027 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Susan | Freeman | | Network Operator Services, Inc. | P.O. Box 3529 Longview, TX 75606 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Paul | Fuglie | | Verizon Select Services | HQE01H21 600 Hidden Ridge Irving, TX 75038 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Wayne | Gandy | | Encompass Communications, LLC | Suite 286 119 West Tyler Street Longview, TX 75601 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Bill | Garcia | bill.garcia@windstream.com | Windstream | 1800 Old Pecos Trail, Suite J Santa Fe, NM 87505 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|--------------|------------------------------------|--------------------------------------|---|---------------------------|-------------------|--|
| Edward H. | Griffin | | US LEC Communications, Inc. | 6801 Morrison Blvd. Charlotte, NC 28211 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Donna | Gunderson | | Johnson Telephone Company | 205 1st Avenue NE PO Box 39 Remer, MN 56672 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 551012147 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mary | Haberek | mhaberek@ami.net | AMI Communications, Inc. | 300 Cardinal Drive, Suite 280 St. Charles, IL 60175 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Robert L. | Hammond, Jr. | N/A | BEVCOMM, Inc. | 123 W 7th St Blue Earth, MN 56013-1309 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Bruce | Hanson | N/A | Zumbrota Telephone Company | 1700 Technology Dr Ste 100 Willmar, MN 56201 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| JoAnn | Hanson | joann.hanson@centurylink.com | CenturyLink | 200 S 5th St Ste 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| William | Heaston | bill.heaston@sdncommunications.com | PrairieWave Telecommunications, Inc. | 2900 W. 10th Street Sioux Falls, SD 57104 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Ted | Heckmann | ted.Heckmann@cinbell.com | Cincinnati Bell Any Distance, Inc. | P.O. Box 2301 221 E. Fourth Street, 1280 Cincinnati, OH 45201-2301 | Electronic Service 03- | No | OFF_SL_13-459_R-13-459 Service List |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------------|-------------------------------------|---|--------------------|-------------------|-------------------------------------|
| Jerry | Heiberger | jerry.heiberger@itctel.com | Interstate Telecommunications Coop. | P.O. Box 920 Clear Lake, SD 57226 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Andy | Hennis | andyh@chriscomco.net | Christensen Communications Company | 104 West Main Street Madelia, MN 56062 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Pamela | Hintz | | One Communications | 5 Wall Street Burlington, MA 1803 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Scott | Hoffmann | hoffmann@wins.net | Wisconsin Independent Network, LLC | Box 107 800 Wisconsin Street Eau Claire, WI 547033612 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Paul | Hoge | phoge@crosslake.net | Crosslake Communications | 35910 County Road 66 PO Box 70 Crosslake, MN 56442 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Kevin | Hopkins | khopkins@telephoneassociates.com | Telephone Associates, Inc. | 329 Grand Ave Superior, WI 54880 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Rich | Horner | | Guaranteed Phone Service | #1 2201 West Broadway Council Bluffs, IA 51501 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Karen | Hyde | bademilkaren.hyde@level3.com | Level 3 Communications | 200 Technology Drive Pittsburgh, PA 15219 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Charles S. | Isdall | | Comdata Telecommunications Services | 5301 Maryland Way Brentwood, TN 37027 | Paper Service | No | OFF_SL_13-459_R-13-459 Service 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 | OFF_SL_13-459_R-13-459 Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|---------------------------|--|--|--------------------|-------------------|--|
| Marja | Johnson | lisa@cicom.net | Coast International Inc. | 14303 West 95TH Street Lenexa, KS 66215 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Steve | Katka | skatka@albanytel.com | Albany Mutual Telephone Association | 131 6th St Albany, MN 56307-8322 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| John | Kroger | johnkroger@wctatel.com | Winnebago Cooperative Telecom Assn. | 704 E. Main Street Lake Mills, IA 50450 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Kevin | Larson | klarson@ctctelcom.com | Consolidated Telephone Company | PO Box 972 1102 Madison St Brainerd, MN 56401 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Larry | Laskowski | | Network Billing Systems | 155 Willowbrook Blvd Wayne, NJ 7470 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| 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 | No | OFF_SL_13-459_R-13-459 Service List |
| Mary | Lohnes | mary_lohnes@mml.net | Midcontinent Communications | 3600 Minnesota Dr Ste 700 Edina, MN 55435 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Bill | Loonan | | Lismore Coop. Telephone Co. | PO Box 127 Lismore, MN 56155 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Lee | Maier | lee@runestone.net | Runestone Telephone Association | PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| James | Mancuso | jmancuso@clearworld.net | Clear World Communications | 3501 South Harbor Blvd. Suite 200 Santa Ana, CA 92704 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------------|---------------------------------------|--|--------------------|-------------------|--|
| Thomas | Margavio | tm5886@att.com | BellSouth Long Distance, Inc. | AT&T Midtown Center 675 W Peachtree Ste 17E21 Atlanta, GA 30375 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Francie | McComb | | Talk America, Inc. | 2134 W. Laburnum Ave. Richmond, VA 232274342 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Anthony | Mendoza | tony@mendozalawoffice.com | Mendoza Law Office, LLC | 790 S. Cleveland Ave. Suite 206 St. Paul, MN 55116 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Shelby | Michlin | | Network Billing Systems, LLC | 155 Willowbrook Blvd. Wayne, NJ 7470 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Monty | Morrow | montymorrow@nu-telecom.net | NU Telecom | 235 Franklin St PO Box 279 Hutchinson, MN 55350 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Michael | Nelson | Michael_Nelson@cable.comcast.com | Comcast Corp. | 183 Inverness Drive West Englewood, CO 80112 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Daniel C. | Nelson | dcndtc@bevcomm.net | Dunnell Telephone Company, Inc. | PO Box 42 110 N Seeley Ave Dunnell, MN 56127 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| David | Nelson | davidnelson@kpcoop.com | Kandiyohi Power Cooperative | P.O. Box 40 8605 47th Street NE Spicer, MN 562880040 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Financial | Officer | | Emily Cooperative Telephone Company | P.O. Box 100 Emily, MN 564470100 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jeffrey J. | Olson | jeffolson@rrt.net | Red River Rural Telephone Association | 506 Broadway PO Box 136 Abercrombie, ND 58001-0136 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------|-------------------------------------|--|--------------------|-------------------|--|
| Bill | Otis | billotis@nu-telcom.net | New Ulm Telecom, Inc. | PO Box 697 27 North Minnesota St New Ulm, MN 56073-0697 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Bill | Otis | N/A | Sleepy Eye Telephone Co. | 27 N. Minnesota Street PO Box 697 New Ulm, MN 56073 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jean | Pauk | jean.pauk@tdstelecom.com | TDS Telecom | 525 Junction Road Madison, WI 53717 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Gloria | Pederson | gpederson@bevcomm.com | Cannon Valley Telephone, Inc. | 123 West Seventh Street Blue Earth, MN 56013 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Rochelle | Pervisky | RPervisky@exchange.hbcicom | Hiawatha Broadband | 58 Johnson Street Winona, MN 55987 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jack D. | Phillips | jack.phillips@ftr.com | Frontier Communications Of MN, Inc. | 14450 Burnhaven Drive Burnsville, MN 55306 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Dean | Polkow | | Rural Cellular Corporation | PO Box 2000 3905 Dakota Street Southwest Alexandria, MN 563082000 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jessica | Renneker | jrenneker@nos.com | NOS Communications, Inc. | 250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Robert | Riddell | telenutz@mlecwb.net | Northern Telephone Company | 13448 Co. Rd. 25 Wawina, MN 557369721 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Judith A | Riley | jriley@telecompliance.net | Mosaic Networx LLC dba MX NETWORK | PO Box 720128 Oklahoma City, OK 73172-0128 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------|--------------------------------------|--|--------------------|-------------------|-------------------------------------|
| Carey | Roesel | | Technologies Management, Inc. | PO Drawer 200 Winter Park, FL 327900200 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Steve | Roussos | N/A | Convergia, Inc. | 237 Hymns Blvd Pointe Claire, Quebec H9R 5C7 CANADA | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Marc | Rozar | | Custom Network Solutions, Inc. | Suite 102 210 E Route 4 Paramus, NJ 76525103 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jill | Sandford | jill.sandford@zayo.com | Zayo Group, LLC | 360 Hamilton Avenue White Plains, NY 10601 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Cheryl | Scapanski | cscapanski@bctelco.net | Benton Cooperative Telephone Company | 2220 125th St NW Rice, MN 56367 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jeff | Schill | jeff.schill@netins.com | Iowa Network Services Inc | 4201 Corporate Drive West Des Moines, Iowa 50266 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| David | Schornack | N/A | Loretel Systems, Inc. | 150 Second Street SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| David | Schornack | N/A | Felton Telephone Company | 150 Second Street SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| David | Schornack | N/A | Arrowhead Communications Corporation | 150 Second Street SW Perham, MN 56573 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| David | Schornauk | | Unitel Communications | P.O. Box 151 Park Rapids, MN 55470 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |

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|------------|-----------|------------------------------|---|--|--------------------|-------------------|--|
| James | Seliga | N/A | FTTH Communications L.L.C. | 2930 146th St Ste 105 Rosemount, MN 55068 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Janett | Smith | | Touch 1 Communications, Inc. | 100 Brookwood Road Atmore, AL 36502 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Don | Snyders | don@alliancecom.net | Alliance Communications Cooperative, Inc. | PO Box 349 612 Third St Garretson, SD 57030 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Lance J.M. | Steinhart | info@telecomcounsel.com | Attorney at Law | 1725 Windward Concourse Ste 150 Alpharetta, GA 30005 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Kate | Stem | kate.stem@accesspointinc.com | Access Point, Inc. | 1100 Crescent Green, Ste. 109 Cary, NC 27518 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Paul | Stowman | paul@rothsay.us | Rothsay Telephone Company | PO Box 158 137 1st St NW Rothsay, MN 56579-0158 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Cynthia | Sweet | csweet@acecomgroup.com | Ace Telephone Association | 207 East Cedar P.O. Box 360 Houston, MN 559430360 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Loretta | Tastad | loretta.tastad@arvig.com | East Otter Tail Telephone Company | 150 2nd Street SW Perham, MN 56573 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Mike | Theisen | | Northern Minnesota Utilities | 910 Cloquet Ave. Cloquet, MN 55720 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-------------|--------------------------------|--------------------------------|---|--------------------|-------------------|--|
| Mark | Thoma | markthoma@wctatel.com | Winnebago Coop. Telecom Assoc. | 704 E Main St Lake Mills, IA 50450 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Carl | Thompson | | PromiseVision Technology, Inc. | #212 1050 E 2nd Edmond, OK 73034 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jason | Topp | jason.topp@centurylink.com | CenturyLink | 200 S 5th St Ste 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| William | VanderSluis | N/A | CP Telecom | 209 W 1st St Duluth, MN 55802 | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Dana | Wahlberg | dana.wahlberg@state.mn.us | Department of Public Safety | Town Square Ste 137 444 Cedar St St. Paul, MN 551015126 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Jerry | Watts | jerry.watts@corp.earthlink.com | EarthLink | Suite 106 3000 Columbia House Blvd. Vancouver, WA 98661 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Avi | Weisman | | Gold Line Telemanagement Inc. | 180 West Beaver Creek Rd Richmond Hill, ON L4B 1B4 CANADA | Paper Service | No | OFF_SL_13-459_R-13-459 Service List |
| Sandra | Williams | sandrawilliams@netoneint.com | Net One International, Inc. | 6933 University Blvd. Winter Park, FL 32792-6707 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |
| Lyle R. | Williamson | Lyle.Williamson@Verizon.com | Verizon Wireless | 8350 E Crescent Pkwy Ste 200 Greenwood Village, CO 80111 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |

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|------------|-----------|-----------------|---|--|--------------------|-------------------|--|
| David | Wolf | dwolf@gctel.net | Gardonville Cooperative Telephone Association | 800 Central Ave N Brandon, MN 56315 | Electronic Service | No | OFF_SL_13-459_R-13-459 Service List |