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September 10, 2015

PUBLIC DOCUMENT

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

Re: PUBLIC Reply Comments of Dunnell Telephone Company, Inc.
Docket No. P999/PR-15-08

Dear Mr. Wolf:

Attached are the **PUBLIC** Reply Comments of Dunnell Telephone Company, Inc. in the following matter:

Annual Certifications Related to Eligible Telecommunications Carriers' (ETCs)
Use of the Federal Universal Service Support.

Dunnell Telephone Company's Reply Comments are contained herein. I am available to answer any questions the Commission may have.

Sincerely,

DYKEMA GOSSETT PLLC

/s/ Shannon M. Heim

Shannon M. Heim
Counsel for Dunnell Telephone Company, Inc.

Attachment

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PUBLIC DOCUMENT

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

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipshultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

In the Matter of Annual Certification) MPUC Docket No. P999/PR-15-08
Related to ETC use of Federal Universal)
Service Support)

PUBLIC REPLY COMMENTS OF DUNNELL TELEPHONE COMPANY

Dunnell Telephone Company, Inc. (“Dunnell Telephone”) hereby files its **Public Reply** Comments to the comments by the Minnesota Department of Commerce.¹ The deadline for such Reply Comments was extended by the Minnesota Public Utilities Commission (the “Commission”) to September 10, 2015.² Dunnell Telephone appreciates the Department’s willingness to work with Dunnell Telephone to understand its unique financial situation. Dunnell Telephone has diligently worked to provide the Department all of the financial documents and work papers it has available. It hereby supplements those documents.

I. Factual Background.

Dunnell Telephone is a very small, rural telephone company serving approximately 175 access lines in south central Minnesota. Dunnell Telephone Company, Inc. was acquired by KCL

¹ *In the Matter of Annual Certification Related to ETC use of Federal Universal Service Support*, Docket No. P999/PR-15-08, Comments of the Minnesota Department of Commerce, before the Minnesota Public Utilities Commission (Sep. 4, 2015) (“*DOC Comments*”).

² *In the Matter of Annual Certification Related to ETC use of Federal Universal Service Support*, Docket No. P999/PR-15-08, Notice of Extended Comment Period, before the Minnesota Public Utilities Commission (Aug. 31, 2015).

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Enterprises, LLC in July 2014.³ **[TRADE SECRET INFORMATION HAS BEEN EXCISED.]**

IV. Specific Responses to Department Requests For Additional Information.

The Department suggests that if Dunnell Telephone provides additional information, the Commission should recertify it to the FCC.⁴ **[TRADE SECRET INFORMATION HAS BEEN EXCISED.]**

V. Conclusion.

[TRADE SECRET INFORMATION HAS BEEN EXCISED.] Dunnell Telephone respectfully asks the Commission to recertify it as an ETC.

September 10, 2015

Respectfully submitted,

DYKEMA GOSSETT, PLLC

/s/ Shannon M. Heim
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Counsel for Dunnell Telephone Company

³ See *In the Matter of the Joint Petition of Dunnell Telephone Company, Incorporated and KCL Enterprises, LLC for Approval of Stock Transfer*, Docket No. P-517/PA-14-511, Order, before the Minnesota Public Utilities Commission (July 11, 2014).

⁴ *DOC Comments* at Appendix B, page 3.

(Exhibit A)

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(TRADE SECRET DATA HAS BEEN EXCISED)