

October 7, 2021

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**  
Docket No. P999/CI-21-72

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce in response to the Minnesota Public Utilities Commission's September 7, 2021 Notice of Comment Period on TAP Budget.

Sincerely,

/s/ DIANE DIETZ  
Rate Analyst

DD/ar  
Attachment

## Before the Minnesota Public Utilities Commission

---

### Comments of the Minnesota Department of Commerce

Docket No. P999/CI-21-72

#### I. BACKGROUND

On January 15, 2019, the Minnesota Public Utilities Commission (Commission) issued its *Order Setting TAP Credit Amount and Surcharge Level and Requiring Local Service Providers to Include TAP Information on Their Websites* in Docket Nos. P999/CI-17-677 and P999/CI-18-112. In that Order, the Telephone Assistance Plan (TAP) credit increased from \$3.50 to \$7.00 per month. The monthly TAP surcharge, which funds the TAP program, increased from \$.03 to \$.10 per access line. The changes to the TAP credit and surcharge were implemented on July 1, 2019, or the first billing cycle thereafter. Before the issuance of the January 15, 2019 Order, the TAP surcharge and available credit were last changed by the Commission in its August 10, 2013 Order in Docket No. P999/CI-13-213.

On January 22, 2021, the Commission issued its *Order Modifying Monthly TAP Program Credit and Surcharge and Reconvening Advisory Group* in Docket No. P999/CI-20-665. In that Order, the TAP credit increased from \$7.00 to \$10.00 per month. The monthly TAP surcharge, which funds the TAP program, decreased from \$.10 to \$.07 per access line, to be effective on April 1, 2021.

On August 2, 2021, the Commission issued its *Notice of Lifeline Outreach Filing Requirement for High Cost ETCs* in Docket Nos. P999/CI-20-747 and P999/PR-21-8. The Notice directed all High Cost ETCs to follow the Lifeline best practices requirements established in the Commission's July 20, 2021 Order in Docket Nos. P999/CI-20-747 and P999/PR-21-8.

#### II. STATUTORY AUTHORITY

Minnesota Statutes §§ 237.69 - .711 govern the TAP program.

Minnesota Rule 7817 establishes rules for the implementation and operation of the TAP program.

#### III. COMMENTS

##### A. INTRODUCTION

In recent years, the Commission made significant increases to the TAP credit to accommodate the needs of subscribers. In its January 15, 2019 Order in Docket Nos. P999/CI-17-677 and P999/CI-18-112 (pages 2 and 3), the Commission made the following statement:

The OAG [Office of the Attorney General] noted that the number of TAP participants has dropped significantly since 2013, from over 73,000 to fewer than 20,000 stemming from a variety of causes, including that the credit cannot be used for cellular or wireless telephone service and the credit is too low for customers to see the value in applying for the program.

The OAG recommended increasing the TAP credit from \$3.50 to \$9.00, increasing the TAP surcharge from \$0.03 to \$0.10, and directing Commission staff to make outreach and promotional efforts without waiting for the TAP/Lifeline Working Group report. . . the Commission believes that the best approach at this time is to increase the credit level awarded per month to \$7.00 per month with an increase in the surcharge level to \$0.10 per month.

The Commission's January 15, 2019 Order largely supported the OAG recommendation, but also recognized the uncertainty that the revised credit and surcharge would have on the TAP fund. This uncertainty appears to have been a consideration when the Commission chose a \$7.00 credit, rather than a \$9.00 credit, as proposed by the OAG.

In its January 22, 2021, in Docket No. P999/CI-20-665, the Commission again increased the monthly TAP credit (i.e., to \$10.00 per month) in recognition of the steady decline in TAP subscribership, despite Commission efforts to promote the program. At the same time, the Commission charged the TAP Advisory Group with the "important role in exploring communications trends, including changes in TAP's federal counterpart, Lifeline, and the migration away from landlines and toward mobile devices and broadband internet service."<sup>1</sup>

#### *B. DEPARTMENT PROPOSAL FOR TAP SURCHARGE AND CREDIT*

The Department prepared Attachment A to estimate the impact on the TAP fund with various levels of TAP surcharges. As the TAP fund balance exceeded \$3 million on July 1, 2021, which may support a further increase in the TAP credit and/or a reduction in the TAP surcharge. If no changes are made, it is estimated that the fund balance will decline by approximately \$365,000 by June 30, 2022. However, since the higher TAP credit of \$10 was not implemented until April 1, 2021, it may be too soon to know how TAP subscribership will be affected. In coordination with the higher credit, the Commission staff recently convened a meeting of the TAP-Lifeline Advisory Group and the participants are charged with considering ways to promote the TAP program to eligible customers. Thus, the full impact of the recent increase in the monthly TAP credit on the level of TAP subscribership, and on the TAP fund balance, may take additional time to become fully realized. At this time, the Department supports maintaining the TAP credit at \$10 and the monthly TAP surcharge at \$.07.

#### *C. CARRIER RESPONSIBILITIES TO PROMOTE AND ENROLL CUSTOMERS IN TAP*

In its October 22, 2020 Comments on the TAP credit and surcharge in Docket Nos. P999/CI-20-665, the Department discussed several recent factors that appear to be related to the significant drop in TAP subscribership in recent years. One of these factors was the FCC's decision to gradually eliminate Lifeline support for voice service. In its October 22, 2020 comments, the Department made the following statement:

---

<sup>1</sup> See January 22, 2021 Order, in Docket No. P999/CI-20-665, page 3.

[T]he FCC's Lifeline Modernization Order initiated a process to eliminate a subsidy for voice service to eligible households.<sup>2</sup> Recipients of Lifeline support, whose voice service does not include internet service that meets standards established by the FCC in its March 31, 2016 Order, saw a reduction in their Lifeline credits from \$9.25 to \$7.25 per month on December 1, 2019; saw a reduction in their Lifeline support to \$5.25 on December 1, 2020; and will see the elimination of the Lifeline benefit for voice service on December 1, 2021, except in areas where this is only one Lifeline provider.<sup>3</sup> The FCC's plan for the gradual reduction and then elimination of Lifeline benefits for voice only customers will result in landline service becoming increasingly unaffordable for otherwise eligible recipients of Lifeline benefits. To the extent that the public interest supports affordable voice service for all Minnesotans, as the Department believes, the FCC's phase out of Lifeline's support for voice services leaves the TAP program as the sole vehicle to assist low income customers.

The final phase of the FCC's gradual phase-out of Lifeline credits to eligible customers, who subscribe to voice service only, is set to occur on December 1, 2021. The impact of the FCC's decision will be most significant to voice-only Lifeline customers on tribal lands, which currently receive an additional monthly Lifeline benefit of \$25.00, or a total credit of \$30.25. As TAP supports only voice service, the Commission may wish to mitigate possible adverse effects to the TAP program that could result from Lifeline no longer supporting voice service by reminding companies of the following:

- 1) TAP program benefits remain available for voice service, even when the Lifeline benefit for voice has been eliminated, and is to be advertised no less than annually, as required by Minnesota Statute section 237.70, subdivision 7 (b) (c) and Minnesota Rules parts 7817.0300, subpart 5.B.4 and 7817.0400, subpart 1.
- 2) A TAP-only application is available on the Commission's website and each company should have a link on its website to the TAP-only application.<sup>4</sup>
- 3) TAP-only applications are to be submitted by the customer directly to the company. Each company is responsible for determining whether the customer applying for the TAP credit is eligible, based on the criteria identified on the application.
- 4) The Commission's June 8, 2018 Order Establishing Auto-enrollment, Use of National Application, and Delegation of Implementation Date in Docket No. P999/CI-18-223 requires the companies to automatically enroll customers in the TAP program if the customer subscribes to voice service and is being enrolled in the Lifeline program. This auto-enrollment in the TAP program for voice service is to continue, even though the customer's Lifeline benefit applies to broadband service.

---

<sup>2</sup> See FCC's March 31, 2016 Third Report and Order, Further Report and Order, and Order on Reconsideration (FCC 16-38).

<sup>3</sup> See FCC's March 31, 2016 News Release entitled "FCC Modernizes Lifeline Program for the Digital Age. Link is at <https://www.fcc.gov/document/fcc-modernizes-lifeline-program-digital-age>. Also see <https://www.fcc.gov/general/lifeline-program-low-income-consumers>

<sup>4</sup> [https://mn.gov/puc/assets/2021%20TAP%20Application\\_tcm14-467828.pdf](https://mn.gov/puc/assets/2021%20TAP%20Application_tcm14-467828.pdf)

- 5) A customer may obtain an eligibility determination to enroll in Lifeline from the National Verifier prior to the customer contacting the company. In the event a customer has been found by the National Verifier to be eligible for Lifeline, that determination may be accepted by the company to enroll the customer in the TAP program if the customer wishes to subscribe to a voice service, independent of whether the customer also subscribes to a broadband service and receives the Lifeline benefit.

#### **IV. COMMISSION ALTERNATIVES**

##### The TAP credit and surcharge

- A. 1. Maintain the current TAP credit and surcharge.
- A. 2. Modify the monthly TAP credit and/or surcharge as prescribed by the Commission.

##### Carrier Responsibilities on TAP

- B.1. Remind companies of the following:
  - a. TAP program benefits remain available for voice service, even when the Lifeline benefit for voice has been eliminated, and is to be advertised no less than annually, as required by Minnesota Statute section 237.70, subdivision 7 (b) (c) and Minnesota Rules parts 7817.0300, subpart 5.B.4 and 7817.0400, subpart 1.
  - b. A TAP-only application is available on the Commission's website and each company should have a link to the TAP-only application.
  - c. TAP-only applications are to be submitted by the customer directly to the company. Each company is responsible for determining whether the customer applying for the TAP credit is eligible, based on the criteria identified on the application.
  - d. The Commission's June 8, 2018 Order Establishing Auto-enrollment, Use of National Application, and Delegation of Implementation Date in Docket No. P999/CI-18-223 requires the companies to automatically enroll customers in the TAP program if the customer subscribes to voice service and is being enrolled in the Lifeline program. This auto-enrollment in the TAP program for voice service is to continue, even though the customer's Lifeline benefit applies to broadband service.
  - e. A customer may obtain an eligibility determination to enroll in Lifeline from the National Verifier prior to the customer contacting the company. In the event a customer has been found by the National Verifier to be eligible for Lifeline, that determination may be accepted by the company to enroll the customer in the TAP program if the customer wishes to subscribe to a voice service, independent of whether the customer also subscribes to a broadband service and receives the Lifeline benefit.
- B.2. Take other action as the Commission deems appropriate.

#### **V. DEPARTMENT RECOMMENDATION**

The Department recommends that the Commission adopt alternatives A.1 and B.1.a,b,c,d,e.

## **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/CI-21-72**

**Dated this 7<sup>th</sup> day of October 2021**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-72_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-72_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-72_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-72_Official

UI13518  
ACN Communication Services, LLC  
Joseph Hartman Sr Mgr- Transaction Tax  
1000 Progress Pl  
Concord NC 28025

UI13417  
Access One, Inc.  
Mark Lammert CPA  
820 W Jackson Blvd, Suite 650  
Chicago IL 60607

UI13843  
Airespring, Inc.  
Cynthia Firstman Dir Fin  
7800 Woodley Avenue  
Van Nuys CA 91406

UI10403  
Alliance Communications Cooperative, Inc  
Kari Flanagan  
PO Box 349  
612 E 3RD ST  
Garretson SD 57030

U6888  
Arrowhead Electric Cooperative, Inc.(P)  
Yusef Orest  
PO Box 39  
5401 W Hwy 61  
Lutsen MN 55612

UI13687  
BCN Telecom, Inc.  
Amanda Gucich  
1200 Mount Kemble Ave FL 3  
Harding Township NJ 07960

UI10131  
Barnesville Municipal Telephone Company  
Guy Swenson Tech Coordinator  
PO Box 550  
101 Front St N  
Barnesville MN 56514

UI10149  
Blue Earth Valley Telephone Company dba  
Gloria Pederson  
123 W 7th St  
Blue Earth MN 56013- 1309

UI14052  
Broadview Networks, Inc.  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

UI13745  
BullsEye Telecom, Inc.  
Lisa Sichler  
25925 Telegraph Rd Ste 210  
Southfield MI 48033

UI14101  
AEX Communications, Inc.  
Thomas M Fletcher  
4445 W 77th St Ste 102  
Edina MN 55435

UI13313  
Ace Link Telecommunications, Inc. dba Ac  
Cynthia Sweet  
207 E Cedar Street  
Houston MN 55943- 8713

U6832  
Airus, Inc.  
Julie Oost  
222 S Riverside Plz Ste 1900  
Chicago IL 60606

U6916  
American Broadband and Telecommunica  
Jeffrey S Ansted President  
1480 Ford St  
Maumee OH 43537- 1731

UI10077  
Arvig Telephone Company  
Amanda Moore  
TDS Telecom  
PO BOX 620988  
MIDDLETON WI 53562

UI13432  
BT Communications Sales LLC  
Ruth Holder  
11440 Commerce Park Drive  
Reston VA 20191

UI10140  
Benton Cooperative Telephone Company  
Tim Hayes  
2220 125th St NW  
Rice MN 56367- 9701

UI10156  
Bridge Water Telephone Company  
Amanda Moore  
TDS Telecom  
525 Junction Road  
Madison WI 53717

UI14091  
Broadvox- CLEC, LLC  
Orvin A Moore Sr, Telecommunications  
550 W Adams Ste 900  
Chicago IL 60661

UI12559  
CBTS Technology Solutions LLC  
Ted Heckmann Director- Regulatory Affai  
221 E 4th St, 103- 1280  
Cincinnati OH 45201

UI10031  
AT&T Corp.  
Vince Rosenthal  
225 W Randolph St, 27C350  
Chicago IL 60606

UI10036  
Ace Telephone Association  
Cynthia Sweet  
207 E CEDAR ST  
Houston MN 55943- 0360

UI10047  
Albany Mutual Telephone Association  
Laura Ostendorf  
131 6th St  
Albany MN 56307- 0570

UI10073  
Arrowhead Communications Corp.  
Jaclyn Blom  
150 2nd Street SW  
Perham MN 56573

UI13869  
BCM One, Inc.  
Geoffrey Bloss CEO  
521 5th Avenue, 14th Floor  
New York NY 10175

UI14053  
Bandwidth.com CLEC, LLC  
Lisa Jill Freeman VP & Reg Compliance  
900 Main Campus Dr Ste 100  
Raleigh NC 27606

UI14047  
Big River Telephone Company, LLC  
Matt Diebold  
24 S Minnesota Ave  
Cape Girardeau MO 63702

UI13872  
Broadband Dynamics, LLC  
Kim Havins  
8757 E Via De Commercio FL 1  
Scottsdale AZ 85258

UI13800  
Broadwing Communications, LLC  
Ted Hankins  
100 CenturyLink Dr  
Monroe LA 71203

UI13586  
COMTECH 21, LLC  
Laura Matosian  
One Barnes Park S  
Wallingford CT 06492



U10213  
Callaway Telephone Company  
Jaclyn Blom  
150 2nd St SW  
Perham MN 56573- 1409

U10227  
CenturyTel of Chester, Inc. dba CenturyLi  
Ted Hankins  
200 S 5th St Ste 200  
Minneapolis MN 55402

U13286  
Charter Fiberlink CC VIII, LLC  
Heather Dobson  
12405 Powerscourt Dr  
St Louis MO 63131- 3674

U10251  
Citizens Telecommunications Company of  
Jessica Matushek  
2378 Wilshire Blvd  
Mound MN 55364- 1652

U6931  
Clear Rate Communications, LLC.  
Jeffery Ortwine  
2600 W Big Beaver Rd Ste 450  
Troy MI 48084- 3336

U6967  
Consolidated Communications Enterprise  
Lance Casey  
2116 S 17th St  
Mattoon IL 61938

U13638  
Contel Systems, Inc.  
Mark Roach Regulatory  
1102 Madison St.  
PO Box 972  
Brainerd MN 56401- 0972

U10315  
Eagle Valley Telephone Company  
Jaclyn Blom  
150 2nd St. SW  
Perham MN 56573

U10323  
Easton Telephone Company dba BEVCOMI  
Gloria Pederson  
123 W. 7th St.  
Blue Earth MN 56013

U11037  
Embarq Minnesota, Inc. dba CenturyLink  
Ted Hankins  
200 S 5th St Ste 2200  
Minneapolis MN 55402

U10215  
Cannon Valley Telecom, Inc.  
Gloria Pederson  
123 W 7th St  
Blue Earth MN 56013

U10738  
CenturyTel of Minnesota, Inc. dba Century  
Ted Hankins  
200 S 5th St Ste 2200  
Minneapolis MN 55402

U14090  
Charter Fiberlink CCO, LLC  
Heather Dobson  
12405 Powerscourt Dr  
Saint Louis MO 63131- 3673

U13914  
City of Windom  
Steve Nasby Regulatory  
444 9th St  
PO Box 38  
Windom MN 56101- 0038

U10233  
Clements Telephone Company, Inc.  
Jaclyn Blom  
150 2nd St. SW  
Perham MN 56573

U10643  
Consolidated Communications of Minnesoc  
Lance Casey  
221 E Hickory Street  
PO Box 3248  
Mankato MN 56002- 3248

U6841  
Crexendo Business Solutions, Inc.  
Susan Cockerham  
1615 S 52nd St  
Tempe AZ 85281

U13486  
EarthLink Business, LLC  
Tim P Loken Director Regulatory Affairs  
4001 N Rodney Parham Rd  
Attn: REGULATORY COMPLIANCE  
Little Rock AR 72212- 2442

U10325  
Eckles Telephone Company dba BEVCOMM  
Gloria Pederson  
123 W 7th St  
Blue Earth MN 56013

U10335  
Emily Cooperative Telephone Company  
Charles Balk  
PO Box 100  
Emily MN 56447- 0100

U12718  
CenturyLink Communications, LLC dba Lu  
Ted Hankins  
200 S 5th St Ste 2200  
Minneapolis MN 55402

U10935  
CenturyTel of Northwest Wisconsin, LLC d  
Ted Hankins  
200 S 5th St Ste 2200  
Minneapolis MN 55402

U10640  
Christensen Communications Company  
Kathy Boutwell regulatory  
104 W Main St  
Madelia MN 56062- 1440

U10231  
Clara City Telephone Exchange Company  
Mark Aaberg  
1104 19th Ave SW Ste B  
Willmar MN 56201

U12251  
Comcast Phone of Minnesota, LLC.  
Brent Reed  
10 River Park Plaza  
Saint Paul MN 55107

U10248  
Consolidated Telephone Company  
Kristi Westbrook  
PO Box 972  
1102 Madison Street  
Brainerd MN 56401

U10303  
Dunnell Telephone Company, Inc.  
Kimberly Starr  
PO Box 728  
Judson TX 75660- 0728

U10320  
East Otter Tail Telephone Company  
Jaclyn Blom  
150 2nd St SW  
Perham MN 56573

U13318  
Electric Lightwave, LLC (New)  
Donna Heaston  
dba Allstream  
2800 Campus Dr Ste 140  
Plymouth MN 55441

U14098  
Entelegant Solutions, Inc.  
Michael Ruziska  
2520 Whitehall Park Dr Ste 200  
Charlotte NC 28273- 3577

*U10363*  
Farmers Mutual Telephone Company  
Pat Knutson  
PO Box 156  
Chokio MN 56221

*U14096*  
FiberNet Monticello  
Mark Birkholz  
118 6th St. West  
Monticello MN 55362

*U12954*  
Frontier Communications of America, Inc.  
Jessica Matushek  
2378 Wilshire Blvd  
Mound MN 55364

*U6857*  
GC Pivotal, LLC  
Ghislaine Tchinda  
1595 Peachtree Pkwy Ste 204- 337  
Cumming GA 30041

*U10402*  
Gardenville Cooperative Telephone Assoc  
Stacy Hansel  
800 Central Ave N  
Brandon MN 56315

*U13844*  
Granite Telecommunications, LLC  
Geoff Cookman  
100 Newport Avenue Ext  
Quincy MA 02171- 1759

*U10445*  
Harmony Telephone Company  
Marsha LaFreniere  
35 1st Ave. NE  
PO Box 308  
Harmony MN 55939- 0308

*U10459*  
Home Telephone Company  
Jaclyn Blom  
150 2nd St. SW  
Perham MN 56573

*U12750*  
IDT America, Corp.  
Carl Billek  
520 Broad St  
Newark NJ 07102

*U13668*  
Intrado Safety Communications, Inc.  
Colleen Lockett  
Regulatory Department  
1601 Dry Creek Dr  
Longmont CO 80503

*U10366*  
Federated Telephone Cooperative  
Pat Knutson  
PO Box 156  
405 2nd St E  
Chokio MN 56221

*U14009*  
First Communications, LLC  
Madison Wolbert  
3340 West Market St  
Akron OH 44333

*U10223*  
Frontier Communications of Minnesota, Ir  
Jessica Matushek  
2378 Wilshire Blvd  
Mound MN 55364- 1652

*U6983*  
GTT Americas, LLC  
Tony Hansel VP, Deputy General Counsel  
7900 Tysons One Place  
Suite 1450  
McLean VA 22102

*U13086*  
Global Crossing Local Services, Inc.  
Ted Hankins  
200 S 5th St Ste 2200  
Minneapolis MN 55402

*U6840*  
Greenfly Networks, Inc. dba Clearfly Com  
Amy So  
PO Box 77706  
San Francisco CA 94107

*U13089*  
Heartland Telecommunications Company  
Kent Westphal  
339 1st Ave. NE, P.O. Box 200  
Sioux Center IA 51250

*U13221*  
Hutchinson Telecommunications, Inc dba  
Monty S Morrow  
PO Box 697  
27 N Minnesota St  
New Ulm MN 56073

*U10295*  
Interstate Telecommunications Cooperati  
Ren Preheim  
312 4th St. West  
PO Box 920  
Clear Lake SD 57226

*U13543*  
Jaguar Communications, Inc.  
Randy Kiesel  
213 S Oak Ave Ste 2000  
Owatonna MN 55060

*U10367*  
Felton Telephone Company, Inc.  
Jaclyn Blom  
150 2nd St. SW  
Perham MN 56573

*U13798*  
France Telecom Corporate Solutions L.L.C  
Joe Topel Regulatory Manger  
13865 Sunrise Valley Dr  
Coppermine Comons Bldg #2 Ste 425  
Herndon VA 20171- 6190

*U13879*  
Fusion Communications, LLC  
Elena Thomasson  
210 Interstate N Parkway Ste 300  
Atlanta GA 30339

*U10401*  
Garden Valley Telephone Company d/b/a  
Tim Brinkman CEO/General Manager  
206 Vance Ave S  
PO Box 259  
Erskine MN 56535

*U10411*  
Granada Telephone Company dba BEVCO  
Gloria Pederson  
123 W 7th St  
Blue Earth MN 56013

*U10440*  
Halstad Telephone Company  
Mark Forseth  
PO Box 55  
345 2nd Ave W  
Halstad MN 56548

*U13825*  
Hiawatha Broadband Communications, Inc  
Nicole Secrist  
58 Johnson St  
Winona MN 55987

*U10465*  
Hutchinson Telephone Company dba NU-  
Nancy Blankenhagen  
PO Box 697  
27 N Minnesota St  
New Ulm MN 56073

*U13659*  
Intrado Communications, LLC  
John Dietzel  
3200 W Pleasant Run Rd Ste 300  
Lancaster TX 75146

*U10511*  
Johnson Telephone Company  
Conrad Johnson  
205 1st Ave NE  
PO BOX 39  
Remer MN 56672- 0039

U10545  
Kasson & Mantorville Telephone Company  
Beth Tollefson  
18 2nd Avenue NW  
Kasson MN 55944

U10586  
Lismore Cooperative Telephone Company  
Tarri Joens  
PO Box 127  
230 S 3rd Ave  
Lismore MN 56155- 0127

U10590  
Lonsdale Telephone Company  
Bonnie Simon  
126 South Main Street  
PO Box 358  
Lonsdale MN 55046

U10661  
MCI Communications Services, LLC  
Missie Burriss  
5055 North Point Parkway  
C/O VERIZON  
Alpharetta GA 30022

U6957  
Magna5 LLC  
Matt Dean Dir of Reg Compliance  
C/O TELECOM PROFESSIONAL, INC.  
PO BOX 720128  
Oklahoma City OK 73172- 0128

U12962  
McLeod USA Telecommunications Services  
Tim Loken  
4001 N Rodney Parham Rd  
ATT: REGULATORY COMPLIANCE  
Little Rock AR 72212- 2442

U13932  
Metropolitan Telecommunications of Minn  
Ralph Dichy Director of Tax Affairs  
55 Water St., 32nd Floor  
New York NY 10041

U10670  
Midwest Telephone Company  
Jaclyn Blom  
150 Second Street SW  
Perham MN 56573

U6852  
Mosaic Networx LLC dba MX NETWORK  
Matt Dean  
c/o Telecom Professionals  
PO Box 720128  
Oklahoma City OK 73172- 0128

U14074  
Nebraska Technology & Telecommunicati  
Gwen Sullivan  
2308 S 156th Cir  
Omaha NE 68130- 2511

U13405  
Level 3 Communications, LLC  
Ted Hankins  
200 S 5th St Ste 2200  
Minneapolis MN 55402

U6912  
Local Access LLC  
Kenny Perkins  
11442 Lake Butler Blvd  
Windermere FL 34786

U10724  
Loretel Systems, Inc.  
Jaclyn Blom  
150 2nd St SW  
Perham MN 56573

U13231  
MCImetro Access Transmission Services, I  
Sharon Adams  
c/o VERIZON  
5055 North Point Parkway  
Alpharetta GA 30022

U13345  
Mainstreet Communications, LLC  
Jaclyn Blom  
150 2nd St SW  
Perham MN 56573

U10658  
Melrose Telephone Company dba Arvig  
Jaclyn Blom  
150 2nd St SW  
Perham MN 56573

U10666  
Mid- State Telephone Company  
Amanda Moore  
TDS Telecom  
PO BOX 620988  
MIDDLETON WI 53562

U10676  
Minnesota Independent Equal Access Cor  
Orvin Moore Senior, Telecommunications  
550 W Adams St Ste 900  
Chicago IL 60661

U7019  
NGA 911, L.L.C.  
Don Ferguson CEO  
8383 Wilshire Blvd Ste 800  
Beverly Hills CA 90211

U14041  
Neo Network Development Inc.  
Vince Aragona CEO  
620 North River Road  
Naperville IL 60563

U13616  
Level 3 Telecom of Minnesota, LLC  
Ted Hankins  
200 S 5th St Ste 2200  
Minneapolis MN 55402

U13458  
Local Access Network, LLC dba Milaca Loc  
Tim Hayes  
2220 125th St NW  
Rice MN 56367- 9701

U13916  
MCC Telephony of Minnesota, LLC  
Melissa Balu  
One Mediacom Way  
Mediacom Park NY 10918

U10636  
Mabel Cooperative Telephone Company  
Julie Kolka  
214 North Main  
P.O. Box 368  
Mabel MN 55954

U10642  
Manchester- Hartland Telephone Company  
Cory Hoerler  
204 Railroad St  
Manchester MN 56007- 5012

U7000  
Metro FiberNet LLC d/b/a MetroNet  
Randy Kiesel  
3701 Communications Way  
Evansville IN 47715

U13760  
Midcontinent Communications  
Kristi Putnam  
3901 N Louise Ave  
Sioux Falls SD 57107

U10684  
Minnesota Valley Telephone Company  
Danny Busche Office Mgr.  
PO Box 310  
340 2nd Ave E  
Franklin MN 55333

U10704  
NOS Communications Inc.  
Jessica Renneker  
250 Pilot Rd. Ste. 300  
Las Vegas NV 89119

U13908  
Neutral Tandem- Minnesota, LLC  
Orvin Moore  
550 W Adams St Ste 900  
Chicago IL 60661

*U14028*  
New Horizons Communications Corp.  
Ronald Sheehan  
200 Baker Ave Ste 300  
Concord MA 01742- 2178

*U13686*  
Northern Iowa Telephone Company  
Kent Westphal  
PO Box 200  
339 1st Ave E  
Sioux Center IA 51250

*U13400*  
Onvoy, LLC  
Orvin Moore Senior, Telecommunications  
550 W Adams St Ste 900  
Chicago IL 60661

*U13016*  
PNG Telecommunications, Inc.  
Sharon Porter  
8805 Governors Hill Dr Ste 250  
Cincinnati OH 45249- 3313

*U10784*  
Park Region Mutual Telephone Co. - Coop  
Mary Jo Biegler  
PO Box 277  
100 Main St  
Underwood MN 56586- 0277

*U10789*  
Peoples Telephone Company  
Jaclyn Blom  
150 2nd St. SW  
Perham MN 56573

*U13889*  
Preferred Long Distance, Inc.  
Jerry Nussbaum  
16830 Ventura Blvd Ste 350  
Encino CA 91436

*U6904*  
RCLEC, Inc.  
Joanne Rauch  
20 Davis Dr  
Belmont CA 94002

*U6859*  
Redwood County Telephone Company  
Jaclyn Blom  
160 2nd St SW  
Perham MN 56573

*U10851*  
Rothsay Telephone Company  
Mary Jo Biegler  
PO Box 277  
Underwood MN 56586

*U13897*  
Nextera Communications, LLC  
Dan Headlee  
619 Maple Street  
Brainerd MN 56401- 3605

*U10736*  
Northern Telephone Company of Minneso  
Shane Young  
13448 County Road 25  
Wawina MN 55736

*U10755*  
Osakis Telephone Company  
Jaclyn Blom  
150 2nd St SW  
Perham MN 56573

*U10556*  
POPP.com, Inc.  
Kiley Kruger  
620 Mendelssohn Ave N Ste 121  
Golden Valley MN 55427

*U10785*  
Paul Bunyan Rural Telephone Coop  
Terri Crews  
1831 Anne St NW  
Bemidji MN 56601- 5660

*U10795*  
Pine Island Telephone Company dba BEVC  
Gloria Pederson  
123 W 7th St  
Blue Earth MN 56013

*U13655*  
QuantumShift Communications, Inc.  
Jenna Brown  
12657 Alcosta Blvd, Ste 418  
San Ramon CA 94583

*U6948*  
RS Fiber Cooperative  
Dawn Bronk  
310 Main Ave  
PO Box 326  
Gaylord MN 55334

*U6950*  
Rock County Broadband Alliance LLC  
Kari Flanagan  
612 3rd Street  
Garretson SD 57030

*U10855*  
Runestone Telephone Association  
Kent Hedstrom CEO  
PO Box 336  
Hoffman MN 56339- 0336

*U14001*  
Northeast Service Cooperative  
Monica Olson  
5525 Emerald Ave  
Mountain Iron MN 55768

*U10716*  
Nuvera Communications, Inc.  
Nancy Blankenhager  
27 N Minnesota St  
P.O. Box 697  
New Ulm MN 56073- 0697

*U13091*  
Ottertail Telcom, LLC  
Mary Jo Biegler Controller  
100 Main St  
P.O. Box 277  
Underwood MN 56586

*U13415*  
PaeTec Communications, LLC  
Gail Gauthier  
4001 N Rodney Parham Rd  
ATTN: REGULATORY COMPLIANCE  
Little Rock AR 72212- 7442

*U14010*  
Peerless Network, Inc.  
John Barnicle  
222 S. Riverside Plaza, ste 1900  
Chicago IL 60606- 6010

*U10796*  
Polar Communications Mutual Aid Corpor  
Shari Flanders CFO  
PO Box 270  
Park River ND 58270

*U10706*  
Qwest Corporation dba CenturyLink  
Ted Hankins  
200 S 5th St Ste 2200  
Minneapolis MN 55402

*U10832*  
Red River Rural Telephone Association  
Jack Plecity  
510 Broadway  
PO Box 136  
Abercrombie ND 58001- 0136

*U6996*  
Roseau Electric Cooperative, Inc. (Phone)  
Tracey Stoll General Manager  
PO Box 100  
1107 3rd St NE  
Roseau MN 56751

*U10914*  
Sacred Heart Telephone Company  
Mark Aaberg  
1104 19th Ave SW Ste B  
Willmar MN 56201

<p><i>U10921</i>            Scott Rice Telephone Company            Nancy Blankenhagen            27 N Minnesota St            P.O. Box 697            New Ulm MN 56073</p>	<p><i>U12819</i>            Securus Technologies, LLC            Michael S. J. Lozich, Sr. Director- Reg            4000 International Pkwy            Carrollton TX 75007</p>	<p><i>U10933</i>            Sleepy Eye Telephone Company            Nancy Blankenhagen            PO Box 697            27 N Minnesota St            New Ulm MN 56073</p>
<p><i>U7048</i>            Smart Communications Holding, Inc.            Jonathan D. Logan            10491 72nd Street            Seminole FL 33777</p>	<p><i>U10937</i>            South Dakota Network, LLC            Sarah Tuntland            2900 W 10th St            Sioux Falls SD 57104- 2543</p>	<p><i>U6845</i>            Southwest Minnesota Broadband Services            Travis Thies            110 S. Hwy 86            PO Box 1006            Lakefield MN 56150</p>
<p><i>U6875</i>            Spectrotel of the Midwest, LLC.            David Zahka Chief Financial Officer            3535 State Highway 66 Ste 7            Neptune NJ 07753</p>	<p><i>U10942</i>            Spring Grove Communications            Jacqui VanMinsel            166 W Main St            Spring Grove MN 55974</p>	<p><i>U10952</i>            Starbuck Telephone Company            Mark Aaberg            1104 19th Ave SW            Willmar MN 56201- 5006</p>
<p><i>U11025</i>            TDS Metrocom, LLC            Jean Pauk            525 Junction Rd Ste 6000            Madison WI 53717</p>	<p><i>U13198</i>            Tekstar Communications, Inc.            Jaclyn Blom            dba Arvig Communication Systems            150 2nd St SW            Perham MN 56573</p>	<p><i>U6910</i>            Telco Experts, LLC            Adam Goldberg            9858 Clint Moore Rd            Ste C111- 279            Boca Raton FL 33496</p>
<p><i>U6885</i>            Telcologix, LLC            Linda Dobinson Operations Officer            209 W 1st St Ste 200            Duluth MN 55802- 1909</p>	<p><i>U13792</i>            Telecom One, Inc.            Carrie Schmidt            13400 Bishops Ln Ste 295            Brookfield WI 53005- 6231</p>	<p><i>U14056</i>            Telephone Associates of Minnesota, Inc.            Suzanne K Jaques Accounting/HR Dept            PO Box 1436            Superior WI 54880</p>
<p><i>U13146</i>            Teleport Communications America, LLC            Vince Rosenthal            225 W Randolph St, 27C350            Chicago IL 60606</p>	<p><i>U6998</i>            Teliix, Inc.            Doug Funsch            21699 E Quincy Avenue            Unit F- 285            Aurora CO 80015</p>	<p><i>U13867</i>            Telrite Corporation            Kathy Kemp            11100 Alcovy Road            Covington GA 30014</p>
<p><i>U6970</i>            Tri- Co Technologies, LLC            Gloria Pederson            123 West 7th St            Blue Earth MN 56013</p>	<p><i>U11022</i>            Twin Valley- Ulen Telephone Co.            Jaclyn Blom            150 2nd St SW            Perham MN 56573</p>	<p><i>U6873</i>            US Signal Company, LLC.            Barbara Boshoven VP Corp Affairs            201 Ionia Ave SW            Grand Rapids MI 49503</p>
<p><i>U11040</i>            Upsala Cooperative Telephone Association            Melissa Tschida            PO Box 277            Upsala MN 56384</p>	<p><i>U13394</i>            VAL- ED Joint Venture, LLP dba 702 Comm            Brian Crommett            702 Main Avenue            Moorhead MN 56560</p>	<p><i>U11056</i>            Valley Telephone Company            Mary Biegler            PO Box 277            100 Main St            Underwood MN 56586</p>
<p><i>U13621</i>            Velocity Telephone, Inc.            Jim. Lundberg            656 Mendelssohn Ave N            Golden Valley MN 55427</p>	<p><i>U6821</i>            Velocity, A Managed Services Company, Inc            Susan Cockerham            7130 Spring Meadows W Dr            Holland OH 43528</p>	<p><i>U6993</i>            Vesta Solutions, Inc.            Karen Higgs            500 West Monroe St FL 39            Chicago IL 60661</p>
<p><i>U6933</i>            Vodafone US Inc. dba Vodafone Americas            Bryan Ganno Compliance Manager            1615 Platte St Ste 02- 115            Denver CO 80202</p>	<p><i>U13598</i>            WIN, LLC            Lee Lappin            4955 Bullis Farm Rd            Eau Claire WI 54701</p>	<p><i>U11089</i>            West Central Telephone Association            Jennifer Grewe            308 Frontage Road            PO Box 304            Sebeka MN 56477</p>

U11097  
Western Telephone Company  
Nancy Blankenhagen  
27 N Minnesota St # 697  
C/O NEW ULM TELECOM INC.  
New Ulm MN 56073

U11101  
Wikstrom Telephone Company  
Curtiss Wikstrom  
PO Box 217  
212 S Main Street  
Karlstad MN 56732- 0217

U13534  
Windstream EN- TEL, LLC  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

U10579  
Windstream Lakedale, Inc.  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

U14089  
Windstream NorthStar, LLC  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

U11109  
Winthrop Telephone Company  
Danny Busche Office Mgr.  
PO Box 310  
318 2nd Ave E  
Franklin MN 55333- 0310

U13923  
XO Communications Services, LLC  
Sharon Adams  
22001 Loudoun Cty Pkwy  
Ashburn VA 20147

U11125  
Zumbrota Telephone Company  
Bruce Hanson Regulatory  
1104 19th Ave SW Ste B  
Willmar MN 56201

U13727  
Wholesale Carrier Services, Inc.  
Mark Lammert CPA, President & CEO  
C/O Compliance Solutions Inc.  
242 Rangeline Rd  
Longwood FL 32750

U12806  
Wilderness Valley Telephone Company Inc  
Shane Young  
13448 County Road 25  
Wawina MN 55736

U14058  
Windstream KDL, LLC  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

U12640  
Windstream NTI, LLC  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

U11106  
Winnebago Cooperative Telecom Associat  
Mark Thoma General Manager  
704 E Main St  
Lake Mills IA 50450

U11111  
Wolverton Telephone Company  
Kellen Arneson  
PO Box 270  
Park River ND 58270- 0270

U13997  
YMax Communications Corp.  
Tina Tecce  
1655 Palm Beach Lakes Blvd Ste 1012  
West Palm Beach FL 33401- 2211

U6847  
dishNET Wireline L.L.C.  
Jason Erdmann  
DISH  
1110 Vermont NW Ste 750  
Washington DC 20005

U6877  
Wide Voice, LLC  
Erla Erlingsdottir  
410 S Rampart Ste 390  
Las Vegas NV 89145- 5749

U13330  
Windstream Direct, LLC  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

U12858  
Windstream Lakedale Link, Inc.  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

U14054  
Windstream Norlight, LLC  
Gail Gauthier  
4001 N Rodney Parham Rd  
Attn: Regulatory Compliance  
Little Rock AR 72212- 2442

U11108  
Winsted Telephone Company  
Amanda Moore  
525 Junction Rd  
C/O TDS TELECOM  
Madison WI 53717

U11112  
Woodstock Telephone Company  
Terry Nelson  
337 Aetna St  
Ruthton MN 56170

U6854  
Zayo Group, LLC  
William McConnell Director, Reg Reporti  
1401 Wynkoop St Ste 500  
Denver CO 80202

U13314  
inContact, Inc. dba UCN  
Karen Hyde  
75 W Towne Ridge Pkwy  
Tower 1  
Sandy UT 84070- 5522