

Staff Briefing Papers

Meeting Date	September 18, 2025		Agenda Item 1*
Company	Local Exchange Carriers, Eligible Telecommunications Carriers		
Docket No.	P999/PR-25-8		
	In the Matter of Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of the Federal Universal Service Support Required Pursuant to C.F.R. 54.313		
Issues	Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314?		
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✓ Relevant Documents	Date
Comments of the Minnesota Department of Commerce	September 2, 2025
Minnesota Telecom Alliance	September 5, 2025
Revised Comment, Department of Commerce	September 9, 2025

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

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Statement of the Issues

- 1. Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314?**

Background

In this proceeding, the Minnesota Public Utilities Commission (Commission) is asked to certify 98 ETCs and another seven ETCs (which could be certified by another state Commission)¹ after review of each Company's FCC Form 481. An additional sixteen carriers listed in Table 4 have requested that the Commission certify each of them. These ETCs s filed 481 forms in the current docket but received no high-cost funding during the calendar year 2024 and are not on USAC's list of carriers needing certification this year.

Under the Federal Telecommunications Act of 1996, telecommunications carriers must be designated "eligible telecommunication carriers" (ETCs) to qualify for subsidies from the federal Universal Service Fund for serving high-cost areas or low-income consumers.² State regulatory commissions have primary responsibility for designating ETCs, although the Federal Communications Commission (FCC) acts on designation requests from carriers who are not subject to state commission jurisdiction.

Each year, the Commission and all state commissions must certify that ETCs receiving High-Cost Funds are using the funds received in the previous year (2024) and will use the funds in the coming year (2026), only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Since 2001, states have filed annual certification of FCC Form 481 compliance filings by ETCs regarding high-cost program support from the Universal Service Fund (USF). All companies filing FCC Form 481 under 47 C.F.R. 54.313 are normally certified by the Commission and Commission Staff enters the Commission's action via the Universal Service Administrative Company (USAC) electronic certification roster and by sending a hardcopy to the FCC by USPS as per federal practice. The Commission does this under authority delegated in 47 C.F.R. 54.314. Wireless companies filing FCC Form 481 under 47 C.F.R. 54.422 do so for the Commission's information only. Those wireless companies are appropriately not listed on the USAC verification system and not certified by the Commission to the FCC.

In 2024, the USAC distributed **\$164,771,105.14** to Minnesota ETCs to mitigate high costs in the provision of voice and broadband services from eight different High-Cost Program funds. Under

¹ These are ETCs serving Minnesota customers that primarily operate in other states. The other states would likely certify the ETCs listed in Table 2 below, but the Commission could also certify these ETCs out of an abundance of caution, guarding against the possibility that some other state might fail to grant certification in time.

² [47 U.S.C. § 214\(e\)\(1\)](#).

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these high-cost programs, companies must build out to several locations in given census blocks.³ Each year, through the required filing of FCC Form 481, companies receiving high-cost funds report certain information, including an affidavit that the company meets certain FCC requirements. The Minnesota Commission requires each company seeking certification to include a separate affidavit from a company officer confirming that funds are used appropriately.

On November 8, 2022, the Commission issued an Order Recertifying Eligible Telecommunications Carriers and Setting Additional Requirements, in Docket No. P999/PR-22-8. In that Order, the Commission took the following actions:

- 1) CAFII and RDOF funding recipients must file performance measurement (PM) testing results with all future 481 filings,
- 2) ETCs must continue filing quarterly updates on Tribal Engagement Practices, Quarterly updates for January, April, July, and October must be filed under the docket number for the current year,
- 3) The Commission adopts the Best Practices Recommendations for Tribal Engagement, as shown in Attachment 1 of the Department's September 29, 2022 Report in docket 22-8,
- 4) Each annual filing, beginning in 2023, must include a narrative of how the ETC comports with the Best Practices Recommendations for Tribal Engagement.

On November 15, 2023, in Docket No. P-999/PR-23-8, the Commission issued its Order Recertifying Eligible Telecommunications Carriers and Setting Additional Requirements.⁴ In this Order, the Commission reaffirmed each high-cost funding recipient must submit Performance Measure (PM) Testing results with all future 481 filings and ETCs must continue to file on a quarterly basis documentation of Tribal engagement, consistent with the requirements in the Commission's October 21, 2021, and November 8, 2022, Orders.

On December 12, 2024, in Docket No. P-999/PR-24-8, the Commission issued its Order Certifying Eligible Telecommunications Carriers and Setting Additional Requirements. In this Order, the Commission required carriers receiving high-costing funding to continue filing Tribal engagement efforts and Lifeline Best Practice reports annually in Docket No. 20-747.

Comments on the ETC filings were filed on September 2, 2025, by the Minnesota Department of Commerce (DOC or Department) and reply comments were filed on September 5, 2025 by the Minnesota Telephone Alliance.

Parties' Comments

1. **Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314? and 2. In the event a**

³ Department Revised Comments, September 9, 2025.

⁴ Docket No. P-999/PR-23-8 Commission Order Certifying Eligible Telecommunications Carriers and Setting Additional Requirements, November 15, 2023, Order Point 4, p. 3.

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high cost ETC has not filed an executed affidavit, should the Commission require an executed affidavit be filed as a replacement?

Department

The Minnesota Commission is required to annually certify that “all federal high-cost support provided to [ETCs] within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to” 47 CFR 54.314(a). The FCC’s 481 Form is the primary informational tool used in the certification process, but additional information is relevant in determining whether an ETC should be granted certification.⁵

Tables Attached to the Department Comments⁶

Attached to the Department’s comments are six tables, the first five of which follow the Commission’s October 21, 2021, Order Certifying Eligible Telecommunications Carriers’ Use of Federal High-Cost Subsidy in Docket P999/PR-21-8.

Table 1 lists the Minnesota High Cost ETCs that the Commission should certify, consistent with the Department’s recommendation in the current docket. The Department recommends that the Commission certify the ETCs listed in Table 1.

Table 2 lists the high-cost ETCs that will be certified by other states but could also be certified by the Minnesota Commission.

Table 3 has been reserved for high-cost ETCs where there is a recommendation against certification by the Department.

Table 4 lists Minnesota high-cost ETCs for which the Commission has no action item, but the carriers have requested that the Commission certify the company. The ETCs filed 481 forms in the current docket but received no high-cost funding during the calendar year 2024 and are not on USAC’s list of carriers needing certification this year.

Table 5 lists carriers who, along with their associated SACs, are no longer operational, but whose SACs are still listed in certain USAC spreadsheets. The Department has left Table 5 blank.

Table 6 lists carriers who are non-high-cost ETCs that do not receive high-cost support and do not require certification. These carriers have Lifeline-only designation and offered Lifeline benefits to Minnesota customers during the calendar year 2024.

⁵ Department Comments, September 2, 2025, page 9.

⁶ Department Comments, September 2, 2025, Attachment A, pg 1-9.

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2. Should the Commission continue to require all high-cost funding ETCs to submit Performance Measure (PM) Testing results with all future 481 filings?

The Department recommends that the Commission require all high-cost ETCs to share results of performance measures testing with the Commission in the Annual Certification Docket.

(Decision Option 4) Commerce identified 43 carriers in Minnesota that received funding through one or more of these USF programs and were required to report PM results to USAC in 2024. To protect proprietary information, Department staff informally asked each company to share the summary results of their reporting via confidential email. Almost all providers were 100% compliant throughout the year. In the few cases where deviations may have resulted in withheld funding, the issues were resolved within the time allowed and for the Q4 2024 reporting.⁷

The Minnesota Telecom Alliance (MTA) recommends the Commission ceases Performance Measure Testing as part of ETC compliance. MTA argues PM testing is not pertinent to ETC compliance, the Department lacks the technical capacity to evaluate PM testing results, very few providers are found out of compliance, and administrative burden. MTA states the USAC under FCC direction is responsible for monitoring PM testing, thus state level monitoring is duplicative.⁸ **(Decision Option 5)**

3. Should the Commission require any non-compliant High-Cost ETCs to file Performance Measure (PM) Testing results until reaching compliance?

In 2022, 2023 and again in 2024, the Commission adopted Commerce's recommendations and decided that high-cost carriers that received program funds should report PM testing results in future 481 filings. Reviewing PM test results helps the Commission meet its obligation to monitor use of ratepayer funds in the state. As such, Commerce recommends that the Commission continuing this practice for the foreseeable future to ensure compliance.⁹

4. Should the Commission continue to require quarterly filings of Tribal engagement from the ETCs for the foreseeable future?

The Department indicated that quarterly updates from ETCs are the primary tools used to help the Department evaluate the efforts of each company as they respond to concerns and requests of the Tribe(s). The Department also relies on email correspondence and calls with companies to discuss questions and concerns as they arise. To date, each provider has submitted quarterly reports. Engagement between ETCs and Tribes is consistent, with ETCs sending quarterly correspondence to their primary points of contact and engaging in calls and in-person meetings, when requested.

⁷ Department Comments, September 2, 2025, pg 14.

⁸ Minnesota Telephone Alliance Comments, September 5, 2025, pg 1.

⁹ Id at 15.

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In its November 8, 2022, Order in Docket No. P999/PR-22-8, the Commission adopted the Best Practices Recommendations for Tribal Engagement and directed each ETC that serves Tribal lands to file quarterly updates to memorialize its ongoing efforts to reach out to the tribe(s). These reports are due each year on the first day of January, April, July (as part of the annual filing of Form 481), and October. The plans must include: (a) the carrier's plan to address the individual reporting requirements in form 481 from the FCC, (b) the name, position, and contact information of the person primarily responsible for tribal engagement, and (c) the ongoing duties that person will have with respect to tribal engagement. The Department recommends that the Commission continue to require quarterly filings of Tribal engagement from the ETCs for the foreseeable future.

The Department stated it will comment on these quarterly filings separately from the current comments. As of the date of the preparation of these briefing papers, this has not been filed.

Starting in 2023, the Commission required ETCs to make quarterly outreach efforts to tribes in their services areas and to file proof of that outreach in the annual ETC dockets. Since then, both Commission staff and the Commission's tribal liaison have heard anecdotally that the quarterly outreach requirement can be frustrating to some tribes. Specifically, there has been growing interest in tribal sovereignty over broadband networks on tribal lands. Some tribes may prefer to work with ETCs who can provide broadband to them, while others prefer to pursue grants or other opportunities to build their own networks. Grant opportunities have opened up for tribes to build their own networks. For a tribe who has chosen to build their own network or go with a provider other than the ETC in their area, the required quarterly outreach might be perceived negatively. Staff suggests the quarterly requirement be adjusted to account for the tribe's preference through the Commission's annual tribal consultations.

MTA requests the Commission allow for annual tribal reporting. MTA believes annual tribal reporting aligns with the FCC's intent and provides adequate oversight for ETC certification.¹⁰

5. Should the Commission set December 31, 2025, as a deadline for ETCs to submit their Lifeline Best Practices filings?

The Department pointed out that in addition to the federal Lifeline outreach requirements, the Minnesota Commission's July 20, 2021, Order in Docket No. P999/CI-20-747 established the following best practices regarding advertising of the Lifeline program for high-cost ETCs and directed high-cost carriers to comply with the best practices, to the maximum extent possible:

- A website that meets the following criteria: information within three clicks, searchable keywords, periodic functionality checks, all plan information displayed; and continual updates;
- Social media accounts;
- Regular outreach to social service agencies;
- Assign one employee to act as a Lifeline Champion, or train all employees on

¹⁰ Minnesota Telecom Alliance Comments, September 5, 2025, pg 2.

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- Lifeline at larger ETCs;

- e. Community outreach through various means;
 - f. Tribal outreach; g. Diverse and disabled population outreach;
 - g. Lifeline information on all disconnection notices;
 - h. Paper materials in various formats;
 - i. Participate in Lifeline Awareness Week.

All high-cost carriers submitted compliance filings in Docket No. P999/CI-20-747 and proposed a variety of methods for complying with the Minnesota Commission's Order.

The Commission's December 12, 2024 Order, in Docket No. P999/CI-24-8,²⁶ directed carriers that received high-cost funding during the year 2023 to file their Lifeline Best Practices reports, by December 31, 2025, in compliance with the Commission's Order Establishing Best Practices and Requiring Filings (July 20, 2021) in Docket No. P999/CI-20-747, In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs. These carriers must file the reports electronically in Docket No. P-999/CI-20-747.

The Department recommends the filing requirement established in the Commission's December 12, 2024 Order be updated to require carriers that received high-cost funding during the year 2024 be required to file their Lifeline Best Practices reports by December 31, 2025. The Department states they will file comments on the Lifeline Best Practices filings, including any issues relating to the federal Lifeline outreach requirements, in separate comments in the Commission's high cost ETC annual certification docket.¹¹

Staff Analysis

For Minnesota High-Cost Program ETCs to be eligible for support, the Commission must file an annual certification with the FCC and USAC by October 1st of each year certifying that High-Cost Program funds were used in the previous year, and will be used in the coming year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. If the Commission submits its certification after October 1st of this calendar year, the Minnesota High-Cost Program ETCs may incur funding reductions.

In so far as this annual review is a ministerial duty delegated to the Commission by the FCC, Staff concurs that each of the 129 companies requesting certification appear to have met the filing requirements. Please see Tables 1, 2 and 4 of Attachment A of the Department's September 2, 2025, comments, or Table 1, 2, and 4 of Attachment A of this document for the list of ETCs requiring Commission certification.¹²

Regarding the Department's proposal to require that ETCs provide the results of Performance Measurements (PM) as part of their annual filings of FCC Form 481, Staff suggests that the Commission ask the parties if there is a need to clarify this matter at the meeting.

¹¹ Department Comments, September 2, 2025, pg 11.

¹² Attachment A of Staff Briefing document was prepared by the Department of Commerce.

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With respect to Tribal engagement, Staff notes that over time circumstances regarding the relationship between the Tribes and the carriers continue to change. Both Commission staff and the Commission's tribal liaison have heard anecdotally that the quarterly outreach requirement may not reflect current tribal perspectives. Specifically, there has been growing interest in tribal sovereignty over broadband networks on tribal lands. Some tribes may prefer to work with ETCs who can provide broadband to them, while others prefer to pursue grants or other opportunities to build their own networks. Grant opportunities have opened up for tribes to build their own networks in recent years. For a tribe who has chosen to build their own network or work with a provider other than the ETC in their area, the required quarterly outreach might be perceived negatively. Staff suggests the quarterly requirement be adjusted to account for the tribe's preference through the Commission's annual tribal consultations. This is reflected in **Decision Option 9** below. As such, it would be prudent for the Commission to review the efficacy of continuing both the quarterly and annual filings.

Decision Options

Does the Commission have sufficient documentation through the filed FCC form 481 to be assured the high-cost funds received by each ETCs have been, and will be, used for their intended purposes pursuant to 47 C.F.R. § 54.314?

1. Certify all companies as indicated in Tables 1, 2, and 4 of Attachment A of the staff briefing papers (Department).

AND

2. Provide USAC with a list of carriers (including their SACs) from Table 4 that should be certified in a letter to the FCC (Department).

OR

3. Certify all companies as indicated in Tables 1, 2, and 4 of Attachment A of the staff briefing papers except for the following, which shall not be recertified: [specify any ETCs that are not being recertified].

Should the Commission continue to require all high-cost funding ETCs to submit Performance Measure (PM) Testing results with all future 481 filings?

4. Continue to require all high-cost funding recipients to share Performance Measure (PM) Testing results with all future annual 481 filings (annual certification docket) (Department).

OR

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5. Do not Continue to require all high-cost funding recipients to share Performance Measure (PM) Testing results with all future annual 481 filings (annual certification docket).

Should the Commission require any non-compliant High-Cost ETCs to file Performance Measure (PM) Testing results until reaching compliance?

6. Require any high-cost ETCs that have not reached 100% compliance in the latest reported quarter to file quarterly results with the PUC until the noncompliant ETC reaches 100% compliance (Department).

OR

7. Do not require any high-cost ETCs that have not reached 100% compliance in the latest reported quarter to file quarterly results with the PUC until the noncompliant ETC reaches 100% compliance.

Should the Commission continue to require quarterly filings of Tribal engagement from the ETCs for the foreseeable future?

8. Continue to require each ETC to make quarterly filings of Tribal engagement consistent with the requirements in the Commission's October 21, 2021, and November 8, 2022, Orders. (Department)

AND/OR

9. Delegate authority to the Executive Secretary to require continued quarterly Tribal Engagement Practices filings from ETCs, unless a different cadence is indicated in the Commission's tribal consultation meetings. The Executive Secretary may issue a notice setting different cadences for different ETCs based on the preferences of each tribe. (Staff)

OR

10. Require each ETC to make annual filings of Tribal engagement. (MTA)

OR

11. Discontinue the requirement that ETCs make quarterly filings of Tribal engagement.

Should the Commission set December 31, 2025, as a deadline for ETCs to submit their Lifeline Best Practices filings?

12. Require carriers that were recipients of high-cost funding during the year 2023 to

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submit their Lifeline Best Practices compliance filings, in compliance with the Commission's July 20, 2021 Order in Docket No. P999/CI-20-747, by December 31, 2025. These compliance filings must be efiled in Docket No. P999/CI-20-747.

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Attachment A

**2024 Eligible Telecommunications Carriers for Certification
By the Minnesota Public Utilities Commission**

I. HIGH-COST ETCs THAT THE MINNESOTA PUBLIC UTILITIES COMMISSION SHOULD CERTIFY

The ETCs listed below are included on Minnesota's federal Universal Service High-Cost Program (High-Cost Program) certification and should be certified by the Commission.

Table 1 Minnesota High-Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (Y/N)
1	361346	ACE TEL ASSN-MN	MN	ILEC	Y
2	361347	ALBANY MUTUAL ASSN	MN	ILEC	Y
3	369055	AMG TECHNOLOGY INVESTMENT GROUP, LLC D/B/A NEXTLINK INTERNET	MN	ILEC	Y
4	361374	ARROWHEAD COM CORP	MN	ILEC	Y
5	361350	ARVIGTELCO	MN	CETC	Y
6	369051	ARROWHEAD ELECTRIC COOPERATIVE	MN	ILEC	Y
7	361356	BENTON COOP TEL CO	MN	ILEC	Y
8	361358	BLUE EARTH VALLEY	MN	ILEC	Y
9	361362	BRIDGEWATER TEL CO	MN	ILEC	Y
10	369043	BROADBAND CORP	MN	CETC	Y
11	361365	CALLAWAY TEL CO	MN	ILEC	Y
12	361440	CANNON VLY TELCOM	MN	ILEC	Y
13	361425	CHRISTENSEN COMM CO	MN	ILEC	Y
14	361353	CITY OF BARNESVILLE	MN	ILEC	Y
15	361370	CLARA CITY TEL EXCH	MN	ILEC	Y
16	361372	CLEMENTS TEL CO	MN	ILEC	Y
17	361373	CONSOLIDATED TEL CO	MN	ILEC	Y
18	369044	CONSOLIDATED TELEPHONE COMPANY	MN	CETC	Y
19	361499	CROSSLAKE TEL CO	MN	ILEC	Y
20	361381	DUNNELL TEL CO	MN	ILEC	Y

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Table 1
Minnesota High-Cost ETCs that the Commission Should Certify

No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (Y/N)
21	361383	EAGLE VALLEY TEL CO	MN	ILEC	Y
22	361385	EAST OTTER TAIL TEL	MN	ILEC	Y
23	361384	EASTON TEL CO	MN	ILEC	Y
24	361386	ECKLES TEL CO	MN	ILEC	Y
25	361387	EMILY COOP TEL CO	MN	ILEC	Y
26	361389	FARMERS MUTUAL TEL	MN	ILEC	Y
27	369020	FARMERS MUTUAL TELEPHONE COMPANY	MN	ILEC	Y
28	361390	FEDERATED TEL COOP	MN	ILEC	Y
29	366130	FEDERATED TELEPHONE COOPERATIVE	MN	CETC	Y
30	361403	FEDERATED UTILITIES	MN	ILEC	Y
31	361391	FELTON TEL CO. INC.	MN	ILEC	Y
32	361395	GARDEN VALLEY TEL CO	MN	ILEC	Y
33	369039	GARDEN VALLEY TELEPHONE COMPANY	MN	CETC	Y
34	361396	GARDONVILLECOOPTEL	MN	ILEC	Y
35	361399	GRANADA TEL CO	MN	ILEC	Y
36	361401	HALSTAD TEL CO	MN	ILEC	Y
37	369040	HALSTAD TELEPHONE COMPANY	MN	CETC	Y
38	361404	HARMONY TEL. CO.	MN	ILEC	Y
39	361405	HILLS TEL CO, INC	MN	ILEC	Y
40	361408	HOME TEL CO – MN	MN	ILEC	Y
41	361409	HUTCHINSON TEL CO	MN	ILEC	Y
42	361654	INTERSTATE TELECOM	MN	ILEC	Y
43	369041	INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC.	MN	CETC	Y
44	369038	JAGUAR COMMUNICATIONS, INC.	MN	CETC	Y
45	369047	LTD BROADBAND LLC	MN	CETC	Y
46	361410	JOHNSON TEL CO	MN	ILEC	Y
47	361412	KASSON & MANTORVILLE	MN	ILEC	Y
48	361419	LISMORE CORP TEL CO	MN	ILEC	Y
49	361422	LONSDALE TEL CO	MN	ILEC	Y
50	361443	LORETEL SYSTEMS INC	MN	ILEC	Y
51	361424	MABEL COOP TEL – MN	MN	ILEC	Y

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Minnesota High-Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (Y/N)
52	361426	MANCHESTER-HARTLAND	MN	ILEC	Y
53	361427	MANKATO-HICKORYTECH	MN	ILEC	Y
54	361430	MELROSE TEL CO	MN	ILEC	Y
55	361375	MID-COMM-HICKORYTECH	MN	ILEC	Y
56	369015	MIDCONTINENT COMMUNICATIONS	MN	CETC	Y
57	361413	MID STATE DBA KMP	MN	ILEC	Y
58	361433	MID STATE TEL CO	MN	ILEC	Y
59	361431	MIDWEST TEL CO	MN	ILEC	Y
60	361439	MINNESOTA VALLEY TEL	MN	ILEC	Y
61	361442	NEW ULM TELECOM, INC	MN	ILEC	Y
62	361500	NORTHERN TEL CO – MN	MN	ILEC	Y
63	361448	OSAKIS TEL CO	MN	ILEC	Y
64	361450	PARK REGION MUTUAL	MN	ILEC	Y
65	361451	PAUL BUNYAN RURAL	MN	ILEC	Y
66	366132	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	MN	CETC	Y
67	366133	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	MN	CETC	Y
68	361453	PEOPLES TEL CO – MN	MN	ILEC	Y
69	361454	PINE ISLAND TEL CO	MN	ILEC	Y
70	365142	QWEST CORP – MN	MN	ILEC	Y
71	369054	RED RIVER TELEPHONE COMPANY dba RED RIVER	MN	ILEC	Y
72	361472	REDWOOD COUNTY TEL	MN	ILEC	Y
73	369045	ROSEAU ELECTRIC COOPERATIVE, INC	MN	CETC	Y
74	361474	ROTHSAY TEL CO, INC	MN	ILEC	Y
75	361475	RUNESTONE TEL ASSN	MN	ILEC	Y
76	361423	RUNESTONE TELEPHONE ASSOCIATION	MN	ILEC	Y
77	361476	SACRED HEART TEL CO	MN	ILEC	Y
78	369052	SAVAGE COMMUNICATIONS	MN	CETC	Y
79	361479	SCOTT RICE – INTEGRA	MN	ILEC	Y
80	361483	SLEEPY EYE TEL CO	MN	ILEC	Y
81	361485	SPRING GROVE COOP	MN	ILEC	Y
82	361487	STARBUCK TEL CO	MN	ILEC	Y
83	361491	TWIN VALLEY-ULEN TEL	MN	ILEC	Y
Table 1 Minnesota High-Cost ETCs that the Commission Should Certify					

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No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (Y/N)
84	361494	UPSALA COOP TEL ASSN	MN	ILEC	Y
85	361495	VALLEY TEL CO – MN	MN	ILEC	Y
86	361501	WEST CENTRAL TEL	MN	ILEC	Y
87	369042	WEST CENTRAL TELEPHONE ASSOCIATION	MN	CETC	Y
88	361502	WESTERN TEL CO	MN	ILEC	Y
89	361505	WIKSTROM TEL CO, INC	MN	ILEC	Y
90	369046	WIKSTROM TELEPHONE COMPANY	MN	CETC	Y
91	361348	WILDERNESS VALLEY	MN	ILEC	Y
92	361414	WINDSTREAM COMMUNICATIONS, INC.	MN	ILEC	Y
93	361337	WINNEBAGO COOP ASSN	MN	ILEC	Y
94	369029	WINNEBAGO COOPERATIVE TELECOM ASSOCIATION	MN	ILEC	Y
95	361507	WINSTED TEL CO	MN	ILEC	Y
96	361508	WINTHROP TEL CO	MN	ILEC	Y
97	361512	WOLVERTON TEL CO	MN	ILEC	Y
98	361510	WOODSTOCK TEL CO	MN	ILEC	Y
99	361515	ZUMBROTA TEL CO	MN	ILEC	Y

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**2024 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 2 High-Cost ETCs that are likely to be Certified by Other States but Could Also be Certified by the Commission					
No.	SAC	Carrier Name	Certifying State	Carrier Type	Certification (Y/N)
1	330950	CENTURYTEL OF NW WI	WI	ILEC	Optional
2	351126	CENTURYTEL-CHESTER	IA	ILEC	Optional
3	381614	POLAR TELECOMM.	ND	ILEC	Optional
4	381630	POLAR COMM MUT AID	ND	ILEC	Optional
5	381631	RED RIVER TELEPHONE	ND	ILEC	Optional
6	391405	HILLS TEL CO-SD	SD	ILEC	Optional
7	391657	SPLITROCK TELCOM COOPERATIVE INC.	SD	ILEC	Optional

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**2024 Eligible Telecommunications Carriers for Certification
By the Minnesota Public Utilities Commission**

Table 3					
ETCs that the Commission Should Not Certify					
No.	SAC	Carrier Name	Certifying State	Carrier Type	Certification (Y/N)

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Table 4			
Minnesota High-Cost TCs not requiring certification, but filing information			
No.	SAC	Carrier Name	Certification (Y/N)
1	361445	CENTURYTEL-MINNESOTA	<i>Requested certification, but not included on USAC list, so requires a letter</i>
2	361123	CITIZENS-FRONTIER-MN	<i>Requested certification, but not included on USAC list, so requires a letter</i>
3	367123	CITIZENS-FRONTIER-MN	<i>Requested certification, but not included on USAC list, so requires a letter</i>
4	361456	EMBARQ MINNESOTA	<i>Requested certification, but not included on USAC list, so requires a letter</i>
5	361367	FRONTIER MN	<i>Requested certification, but not included on USAC list, so requires a letter</i>
6	369007	TEKSTAR COMMUNICATIONS, INC.	<i>Requested certification, but not included on USAC list, so requires a letter</i>
7	361482	WINDSTREAM COMMUNICATIONS, INC.	<i>Requested certification, but not included on USAC list, so requires a letter</i>
8	369050	GARDEN VALLEY TELEPHONE COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>
9	369053	GARDONVILLE COOPERATIVE TELEPHONE ASSOCIATION	<i>Requested certification, but not included on USAC list, so requires a letter</i>
10	369049	PAUL BUNYAN TELEPHONE COOPERATIVE	<i>Requested certification, but not included on USAC list, so requires a letter</i>
11	369021	FEDERATED TELEPHONE COOPERATIVE	<i>Requested certification, but not included on USAC list, so requires a letter</i>
12	369030	AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>
13	369049	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	<i>Requested certification, but not included on USAC list, so requires a letter</i>
14	369050	GARDEN VALLEY TELEPHONE COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>
15	369053	GARDONVILLE COOP TEL	<i>Requested certification, but not included on USAC list, so requires a letter</i>
16	369914	CONSOLIDATED TELEPHONE COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>

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Table 5 Carriers on USAC high-cost list, who are no longer operational and whose SACs no longer exist. The Minnesota PUC should write to FCC requesting that these carriers be removed from the USAC's list of high-cost carriers.				
No.	SAC	Carrier Name	Certifying State	Certification (Y/N)

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Table 6A Wireless ETCs that do not receive high-cost support and do not require certification				
No.	SAC	Carrier Name	Certifying State	Certification (Y/N)
1	369016	TELRITE CORPORATION DBA LIFE WIRELESS	MN	N/A
2	369032	TRACFONE WIRELESS, LLC	MN	N/A
3	369025	BOOMERANG WIRELESS	MN	N/A
4	369018	TEMPO TELECOM, LLC	MN	N/A
5	369058	ASSURANCE WIRELESS USA LP	MN	N/A
6	369058	DISH WIRELESS LLC	MN	N/A
7	369017	TERRACOM, INC	MN	N/A
8	369023	I-WIRELESS, LLC	MN	N/A
9	369057	AIR VOICE WIRELESS, LLC	MN	N/A
10	369022	GLOBAL CONNECTION OF AMERICA	MN	N/A
11	369030	AMERICAN BROADBAND AND TELECOMMUNICATIONS CO	MN	N/A
12	369060	IM TELECOM LLC	MN	N/A
13	369034	SAGE TELECOM COMMUNICATIONS LLC	MN	N/A
14	369059	TRUCONNECT COMMUNICATIONS INC	MN	N/A

Table 6B Wireline ETC SACs that do not receive high-cost support and do not require certification				
No.	SAC	Carrier Name	Certifying State	Certification (Y/N)