

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

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In the Matter of Annual Certifications Related
to Eligible Telecommunications Carriers' Use
of Federal Universal Service Support

MPUC Docket No. P-999/PR-18-08

**REPLY COMMENTS OF
T-MOBILE**

In its September 10, 2018 Comments (“Comments”), the Minnesota Department of Commerce (“Department”) recommends that in future years each eligible telecommunications carrier (“ETC”) should file an Affidavit and “Financial Summary.” Comments at 8-9 (Option C). T-Mobile Central LLC (“T-Mobile”) submits these Reply Comments to ask the Commission to clarify whether Form 481s should still be filed with the Commission and to urge the Commission that the proposed Financial Summary requirement should not apply to wireless ETCs.

I. BACKGROUND

T-Mobile is a facilities-based provider of commercial mobile radio service (“CMRS”) providing service in Minnesota. On September 27, 2011, the Commission designated T-Mobile as an ETC for service in Minnesota.¹

In order to receive federal high-cost USF, an ETC whose ETC designation was granted by a state regulatory commission must have its use of support annually certified by the state commission to the Federal Communications Commission (“FCC”) and the Universal Service Administrative Company (“USAC”). 47 C.F.R. § 54.314. High-cost ETCs use a form known as

¹ *In the Matter of T-Mobile Central LLC’s Petition for Designation as an Eligible Telecommunications Carrier (ETC) in Minnesota*, Docket No. P-6856/M-11-123, *Order Granting Petition for ETC Designation, Setting Conditions, and Requiring Compliance Filings* (rel. Sept. 27, 2011).

Form 481 to report compliance information to USAC, and to relevant state commissions as those states may require for purposes of this state certification process.² A state-commission-designated ETC that also receives low-income USF in reimbursement for providing Lifeline service must also annually report certain compliance information on the Form 481. 47 C.F.R. § 54.422(a) and (c).

Since 2011, the FCC has made many changes to the universal service program and related compliance requirements, especially with regard to the inclusion of broadband service as a supported service. In connection with these many changes, the information required to be included in an ETC’s Form 481 varies widely depending on the ETC and the type of USF the ETC is eligible to receive. Through the 2017 filing cycle, the Form 481 of all ETCs receiving high-cost support (including wireless ETCs such as T-Mobile) had to include information on a number of topics. In the *2017 ETC Order*, the FCC removed some of these requirements for the 2018 filing cycle and subsequent years, as set forth in the following table:

Requirement	Required in 2017?	Citation	Required in 2018?	Citation
Detailed information on outages in the prior calendar year	Y	47 C.F.R. § 54.313(a)(2)	N	
Number of unfulfilled requests for service	Y	47 C.F.R. § 54.313(a)(3)	N	
Number of complaints per 1000 connections	Y	47 C.F.R. § 54.313(a)(4)	N	
Certification of compliance with applicable service quality standards and consumer protection rules	Y	47 C.F.R. § 54.313(a)(5)	N	
Certification that carrier is able to function in emergency situations	Y	47 C.F.R. § 54.313(a)(6)	Y	47 C.F.R. § 54.313(a)(1)
The ETC’s price offerings	Y	47 C.F.R. § 54.313(a)(7)	N	
The ETC’s holding companies	Y	47 C.F.R. § 54.313(a)(8)	Y	47 C.F.R. § 54.313(a)(4) ³

² *In the Matter of Connect America Fund*, WC Docket No. 10-90 and *In the Matter of ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Report and Order*, FCC 17-87 (rel. July 7, 2017) (“*2017 ETC Order*”).

³ Some of these provisions were erroneously numbered in the *2017 ETC Order*; the numbering was subsequently corrected. *In the Matter of Connect America Fund*, WC Docket No. 10-90 and *In the Matter of ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Erratum*, (rel. July 14, 2017).

Requirement	Required in 2017?	Citation	Required in 2018?	Citation
Documents demonstrating Tribal engagement	Y	47 C.F.R. § 54.313(a)(9)	Y	47 C.F.R. § 54.313(a)(5)
Certification that the pricing of the ETC's voice services is within two standard deviations of national average	Y	47 C.F.R. § 54.313(a)(10)	Y	47 C.F.R. § 54.313(a)(2)
File copies of Form 481 with FCC, state commissions, and Tribal governments	Y	47 C.F.R. § 54.313(i)	N	2017 ETC Order, ¶¶ 15-16.

In addition, recipients of high-cost USF for provision of broadband services, and rate-regulated carriers that receive high-cost USF, must provide detailed reporting in their Form 481 on a number of additional topics. *See* 47 C.F.R. §§ 54.313(b), (c), (d), (e), (f), (h). For example, privately-held rate-of-return ETCs must include detailed financial reports with their Form 481s (47 C.F.R. § 54.313(f)(2)).

In Minnesota, T-Mobile receives both high-cost USF and Lifeline USF. It is a “legacy” ETC, *i.e.*, one that does not receive USF for the provision of broadband services. On July 11, 2018, T-Mobile filed its 2018 Form 481, which included all information required by FCC rules, with the Commission in this docket. T-Mobile’s Form 481 submission in this docket also included a Certification, signed by an officer, attesting that T-Mobile “used all federal high-cost support in the preceding calendar year (2017) and will use all federal high-cost support in the coming calendar year (2019) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) and 47 C.F.R. § 54.314.”

II. THE DEPARTMENT’S COMMENTS INCLUDE RECOMMENDATIONS FOR AN AFFIDAVIT AND A FINANCIAL SUMMARY

In the Options and Recommendation sections of its Comments, the Department recommends that “in the future, an officer of each company required to file a 481 with the FCC

shall file an affidavit with the...Commission concurrently with the FCC 481 filing.” Comments at 8-9. The Department proposes that the Affidavit “confirm” five items:

- (a) the position of the affiant;
- (b) the affiant understands and is familiar with the requirements of the FCC concerning universal service funding;
- (c) the funds are and will be used appropriately;
- (d) the company is compliant with applicable rules on service quality and consumer protection;
- (e) there is sufficient backup to ensure functionality without an external power source and the company is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergencies.

Comments at 8-9.

The Department’s Comments further recommend that the Affidavit should include a “Financial Summary” showing:

- (a) the sources of federal USF receipts subject to certification;
- (b) an explanation of statewide distribution vs. study area code disbursement;
- (c) plant-specific operations expenses;
- (d) customer operations expenses;
- (e) corporate operations expenses;
- (f) total year supported expenses before return on investment;
- (g) additions;
- (h) 481 financial statement summarized information;
- (i) corporate expense to operating revenue information.

Comments at 9-10. These Financial Summary items are apparently intended to mirror information provided in this docket by certain state-regulated landline ETCs represented by Olson, Thielen, Ltd. Comments at 7. Apparently the Department anticipates that the proposed Financial Summaries would be useful in helping it analyze whether such landline ETCs are making appropriate use of high-cost USF receipts. *Id.*

III. THE DEPARTMENT’S RECOMMENDATIONS SHOULD BE CLARIFIED: WIRELESS ETCs SHOULD NOT BE REQUIRED TO SUBMIT THE FINANCIAL SUMMARY

The Department’s recommendations are not explained with sufficient precision. In particular, the Comments provide very little detail about the Financial Summary, and do not identify the type of ETCs to which the Financial Summary requirements are intended to apply. As it takes action on the Department’s recommendations, the Commission should clarify that, if adopted by the Commission, any Financial Summary requirements do not apply to wireless ETCs such as T-Mobile.

A. T-Mobile does not object to filing the Form 481 with the Commission even though the FCC removed that requirement

As noted above, in 2017 the FCC removed the federal requirement that a state commission designated-ETC must file its Form 481 with the state commission. *2017 ETC Order*, ¶ 15-16. It did so because states should be able to look up the Form 481 information on a central database that USAC is developing, and so it would be duplicative to require ETCs to file paper copies with each state. *Id.* But a state commission could have its own procedures requiring the Form 481 to nevertheless be filed with it.

In Minnesota, the status is unclear—it appears that the Department and Commission are interested in reviewing ETCs’ Form 481s, but there is no explicit requirement in Minnesota law requiring a wireless ETC to file its Form 481 with Minnesota. T-Mobile does not have any concerns about continuing to file a copy of its Form 481 with the Commission even though such filing is no longer required by FCC rules. T-Mobile encourages the Commission to clarify whether ETCs must file copies of their Form 481s with the Commission each year, and if so, whether that requirement applies only to landline ETCs receiving support for provision of broadband, or applies to all ETCs.

B. The proposed Affidavit is not necessary

The Department's proposed Affidavit overlaps substantially with information that high-cost ETCs such as T-Mobile have been required for years to submit.

To begin with, the second and third items in the Affidavit relate to confirmation that the ETC is using the support for the purposes for which it is intended. It is reasonable for the Department and Commission to be concerned about this issue. *See* 47 C.F.R. § 54.314(a) (requirement that states certify that high-costs ETCs' use of USF is only for purposes for which it is intended). That said, those two Affidavit requirements are somewhat duplicative not only of the certification that T-Mobile filed this year, but of the entire principle of the Form 481, which the FCC intends to provide sufficient information for the state commission to use to make a determination to certify the ETC's use of support.

The fourth item in the Affidavit corresponds to an FCC compliance requirement that the FCC decided last year was no longer necessary. *See 2017 ETC Order* at ¶¶ 13-14 (describing how certification as to compliance with service quality standards and consumer protection rules is unnecessary, because the FCC and USAC have the authority to investigate violations of those standards and rules regardless of carriers' certifications). The Department's Comments do not explain why the Department thinks this information is necessary even though the FCC has already determined otherwise.

The fifth item in the Affidavit is duplicative of an FCC requirement that remains in place for high-cost ETCs and is already included in the Form 481. *See* 47 C.F.R. §§ 54.313(a)(1) and 54.202(a)(2). The Department has not explained why the inclusion of this information in an Affidavit, when it is already in the Form 481, would be useful.

In sum, the Department's Comments do not articulate a reason for its Affidavit recommendation. T-Mobile does not strongly object to the application of the proposed Affidavit

requirements to wireless legacy ETCs receiving high-cost support, provided the requirements are not duplicative of information included in other documents filed with the Commission.

C. Wireless ETCs should not be required to submit the proposed Financial Summary

The proposed Financial Summary recommendations go significantly beyond the scope of states' and the FCC's regulation of wireless ETCs, and make no sense when applied to a legacy wireless ETC. Wireless ETCs should not be required to submit the proposed Financial Summary.

It appears that the purpose of the proposed Financial Summary requirements is to analyze the use of funds by regulated land-line carriers for the provision of broadband services. The only context in which the Department discusses such information is in its analysis of the propriety of the use of USF funds by landline carriers such as Dunnell, Arvig, and Frontier as they invest in broadband. This objective, although reasonable, is not applicable to legacy wireless ETCs, such as T-Mobile. The Department has not identified, much less provided any justification for, why wireless ETCs should be required to submit the proposed Financial Summary information.

Consistent with the Department's apparent intent that the proposed Financial Summary requirements relate to landline carriers' use of USF in connection with provision of broadband, the Financial Summary requirements assume the use of a System of Accounts such as is used by rate-regulated carriers. For example, they refer to "plant-specific," "customer operations," and "corporate" expenses. Wireless carriers do not use, nor are they required to use, a System of Accounts that categorizes expenses in this way. Furthermore, wireless carriers such as T-Mobile operate on a nation-wide basis—there is no cognizable means for them to report this information on a Minnesota-specific basis. Undertaking specialized accounting processes to identify the information required by the proposed Financial Summary would be very expensive and onerous.

This is especially so because the requested information is not explained or identified in sufficient detail to allow a wireless carrier to comply.

The Financial Summary would require wireless ETCs to provide detailed Minnesota-specific information about finances and operations to the Commission, the vast majority of which would have very little to do with ETC activity. As such, the Department's proposal would likely run afoul of the longstanding prohibition on state commission regulation of wireless carriers' rates. *See* 47 U.S.C. § 332(c)(3)(A); *Cellco P'ship v. Hatch*, 431 F.3d 1077 (8th Cir. 2005) (describing Section 332 preemption).

The Commission should not impose such a significant reporting requirement on such short notice, with such little explanation, and without providing affected companies a more robust opportunity to analyze the requirements and the cost of compliance.

For all these reasons, T-Mobile strongly opposes the application of the proposed Financial Summary reporting requirements to wireless legacy ETCs.

CONCLUSION

The Department's recommendations are too broad and not very clear. To avoid uncertainty, the Commission's decision in response to the Department's Comments should include a clarification that the Financial Summary requirements are not applicable to wireless ETCs.

BRIGGS AND MORGAN, P.A.

Dated: September 17, 2018

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STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Annual Certification Related to Eligible
Telecommunications Carriers' (ETCs) use of
Federal Universal Service Support

MPUC Docket P999/PR-18-8

Certificate of Service

Patricia A. Kringen, certifies that on the 17th day of September, 2018, she e-filed a true and correct copy of T-Mobile Central LLC's Reply Comments, by posting the document on www.edockets.state.mn.us. Said documents were also served via electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the U.S. Mail.

s/ Patricia A. Kringen

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David	Wareikis	dwareikis@bluejaywireless.com	Blue Jay Wireless, LLC	5010 Addison Circle Addison, TX 75001	Paper Service	No	OFF_SL_18-8_PR-18-8
Kristi	Westbrock	KWestbrock@ctctelcom.net	Consolidated Telephone Company	1102 Madison St Brainerd, MN 56401-0972	Electronic Service	No	OFF_SL_18-8_PR-18-8
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_18-8_PR-18-8
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-8_PR-18-8
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_18-8_PR-18-8
william	haas	william.haas@t-mobile.com	T-Mobile Central LLC	2001 Butterfield Rd Suite 1900 Downers Grove, IL 60515	Electronic Service	No	OFF_SL_18-8_PR-18-8