

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
SUITE 350
121 SEVENTH PLACE EAST
ST. PAUL, MINNESOTA 55101-2147**

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

**In the Matter of the Petition of CenturyLink
QC to be Regulated Pursuant to Minn. Stat.
§ 237.025; Competitive Market Regulation**

**DOCKET NO. P-421/AM-16-496
DOCKET NO. P-421/AM-16-547**

**SUPPLEMENTAL AFFIDAVIT OF JOY GULLIKSON-
(Late filed)**

PUBLIC DOCUMENT—HIGHLY SENSITIVE PROTECTED DATA EXCISED

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, Joy Gullikson, having been duly sworn, state under oath as follows:

1. This late filed supplemental affidavit concerns two areas of additional analysis performed by the Department regarding information CenturyLink or other carriers provided after the Department Reply Brief was filed.
2. First, on March 28, 2017, in its untimely response to a Department information request (IR) ¹, CenturyLink provided information regarding the percentage of lines that serve non

¹ The response date for DOC IR No. 83 was March 22, 2017, the day before the reply brief was due. (Although the due date was misidentified on the IR as March 27, the parties agreed the date was March 22). On March 22 CenturyLink notified Department counsel that "...we have had to manually pull data related to these responses and will not be able to produce responses today. I suspect it will be a couple of days before we can provide responses." CenturyLink provided the response on March 28, 2017. See Gullikson Supp. Affidavit, Attach. JG-1.

households in the Tofte, Grand Marais, and Cook exchanges. This data, relevant to the “fifty percent test,” is discussed in paragraphs 4 to 8 below.

3. Second, the Department learned of important information regarding CenturyLink’s systematic inflation of competition for the “sixty percent” test on March 30, as the Department discovered, while processing the Petition of Woodstock Telephone Company (Woodstock), in Docket No. P575/SA 17-190, to amend its service area and relinquish its authority in the CenturyLink exchanges of Marshall and Pipestone, that Woodstock reported that it had *never provided voice service in the Marshall or Pipestone exchanges*. This information is contrary to Mr. Lubeck’s Exhibit AL-8, where CenturyLink represented that 14 households may choose Woodstock voice service in Marshall and Pipestone. To determine if this was an isolated incident, the Department contacted additional providers listed in AL-8 as “other wireline.” It found that CenturyLink has systematically reported competition by “other wireline” providers in CenturyLink exchanges, but the alleged competitors have never served those exchanges. This is discussed in paragraphs 9 to 13 below.

Correction of CenturyLink’s estimate of the number of households CenturyLink serves in Cook, Grand Marais, and Tofte.

4. The Department and CenturyLink agree that the percentage of households served by CenturyLink is represented accurately by the following ratio²:

$$\frac{\text{Households served by CenturyLink}}{\text{Total households}}$$

CenturyLink’s concern that the numerator might be too high because some of its lines serve vacation property, not households, is readily addressed by removing vacation

² Lubeck Aff. ¶ 6.

property from the numerator of the above ratio. That is, one removes lines in service that serve vacation homes.

5. CenturyLink conducted its count of lines in December, 2015.³ Vacation home owners who **terminated** their seasonal phone service by December were excluded from Mr. Lubeck's count of CenturyLink lines⁴, but seasonally "**suspended**" lines were included in Mr. Lubeck's line count.⁵ At the beginning of its investigation, the Department sent IR No. 32⁶ to CenturyLink to learn how many customers were on vacation suspended service. The response was uninformative and unhelpful. The Department then sent IR No. 83 to CenturyLink⁷ requesting the number of lines in December, 2015 that had a rate adjustment for "temporary suspension of service," which are lines almost always associated with vacation homes, and included in Mr. Lubeck's Confidential Attachment AL-2.
6. In its response to DOC IR No. 83, CenturyLink provided from its February 2017 records the number of lines suspended and the number of lines in service⁸. The Department then applied the percentage:

Suspended lines
All CenturyLink lines

³ Lubeck Aff ¶ 6

⁴ See DOC IR No. 84 in Gullikson Supp. Aff. Att. 1, pages 3 and 4.

⁵ Response to DOC IR No. 32, Gullikson Supp. Aff, Att. 2. CenturyLink stated that if customers disconnected, rather than suspended service, the access line associated with that housing unit would not have been counted when CenturyLink did its count in December of 2015.

⁶ See Gullikson Supp. Aff. Attach. JG-2.

⁷ Gullikson Supp. Affidavit, Attach. JG-1, pages 1 and 2.

⁸ Because CenturyLink does not retain counts of rate adjustments in its historical billing database and could not provide counts from December of 2015, data from February of 2017 was used to apply the ratio of suspended lines to all lines of service.

to the number of lines in service reported in CenturyLink's Confidential AL-2 and the Affidavit of Al Lubeck at ¶ 9. While not perfect, this ratio provides a more accurate percentage of non-households served by CenturyLink than the assumptions made by CenturyLink, which drastically understated the numerator of the fifty percent test.⁹

7. According to CenturyLink's Response to DOC IR No. 83, the ratio of lines with a seasonal adjustment code to the total number of lines in service in February, 2017 are:

[HIGHLY SENSITIVE NOT PUBLIC DATA HAS BEEN EXCISED]

8. The above percentages provide a reasonable proxy by which to adjust the numerator (the number of access lines served by CenturyLink). Adjusting the number of access lines by the percentage of suspended to in-service lines results in the following percent of households with CenturyLink service:

⁹ In its response to DOC IR No. 83, CenturyLink also provided, as requested, the billing addresses of the 3 exchanges in question. A line by line examination of the billing records showing where the billing address was different from the service address may have provided a more accurate number than the application of the ratio described above, but requires too many assumptions. Also, the time required for this analysis was more than the Department could devote, when the ratio provided an adequate proxy.

Gullikson Table 1

Exchange	House holds	CL Lines per AL-2	Percent reduction for suspended service	New CL Lines	UNE-P and Resale	Total Lines	Ratio of household served
[HIGHLY SENSITIVE NOT PUBLIC DATA HAS BEEN EXCISED]							
Cook							
Grand Marais							
Tofte							

Where census blocks straddle CenturyLink’s exchange and another ILECs’ exchange, CenturyLink’s method of counting all households in a census block as “competitor-served” if one household in the block is served, resulted in CenturyLink falsely claiming that tens of thousands of households are served by “Other Wireline” Providers.

- From the Woodstock Petition discussed above, it became clear that CenturyLink reported lines for Woodstock that did not exist. Subsequently, the Department rapidly investigated whether Woodstock was an isolated incident by phoning additional “other wireline” providers listed in Mr. Lubeck’s Attachment AL-8¹⁰. It quickly became evident that CenturyLink’s method significantly overstates the presence of competitors in CenturyLink exchanges. CenturyLink’s method shows that neighboring companies are competitors to households in CenturyLink’s exchanges, when in fact they are not. Copies of correspondence confirming that numerous companies listed on AL-8 do not serve in CenturyLink exchanges are attached as Gullikson Supp. Affidavit, Attachment 3. It took the Department approximately 3 days to interview these companies to verify CenturyLink’s claims; CenturyLink similarly could have verified the data it submitted.

¹⁰ Further, in the CenturyLink Tracy Exchange, Woodstock provided only broadband *wireless* internet access service, and not voice, and only to businesses, which CenturyLink counted on AL-8 as 30 households who could choose voice service from Woodstock.

10. By the Department's calculations, CenturyLink has overstated the availability of a competitor to tens of thousands of households. In addition to Woodstock not available to the 44 households in Marshall or Pipestone and 30 more in Tracy, Frontier Communications, listed in AL-8 as being available to 5,979 households as an "other wireline" competitor in multiple CenturyLink exchanges, serve *no* households in CenturyLink exchanges. Gullikson Supp. Affidavit, Attach. JG- 3 at 1.
11. Global Capacity, LLC, another supposed "other wireline" competitor' with service available to 55,846 households according to CenturyLink, provides no voice service at all in the State of Minnesota.
12. Benton Cablevision, Inc., Barnesville Municipal Telephone, Albany Mutual Telephone Association, and twelve of the Arvig Companies¹¹ also do not offer voice service in CenturyLink exchanges, but CenturyLink's AL-8 claims 3,399 households can choose these companies' voice service.
13. Acentek at 163 households, Nextera at 52,605, and Park Region at 574 households all state that they provide no voice in CenturyLink exchanges.

¹¹ Arrowhead Communications Corporation Callaway Telephone Company, Inc.. East Otter Tail Telephone Company, Felton Telephone Company, Inc., Home Telephone Company, Loretel, Melrose Telephone Company, Midwest, Osakis, Peoples Telephone Company, Redwood County Telephone Company, and Twin Valley Ulen Telephone Co.

14. From the providers contacted, the total households that CenturyLink claims can choose an 'other wireline provider' but the providers deny serving in CenturyLink territory is 118,640.

FURTHER YOUR AFFIANT SAYETH NOT.

Joy Gullikson

Subscribed and sworn to before me on
this 5th day of April, 2017.

NOTARY PUBLIC

My Commission Expires _____

Minnesota Department of Commerce
Information Request

DOCKET Nos.
P-421/AM-16-496
and P-421/
AM-16-547
Gullikson
Supplemental
Affidavit
Attachment JG-1
Page 1 of 4

Docket Numbers: P421/AM-16-496, P421/AM-16-547 Nonpublic Public
Requested From: CenturyLink Date of Request: 3/15/2017
Response Due: 3/27/2017
Requested by: Bonnie Johnson/Diane Dietz/Joy Gullikson
Email Address(es): bonnie.johnson@state.mn.us
Phone Number(s): 651-539-1880

Request Number: 83

Request:

In ¶6 of Mr. Lubeck's November 21, 2016 Affidavit, Mr. Lubeck states, "[t]he number of households is based on the latest United States Census Bureau data, and the primary access lines are based on CenturyLink billing data for end of year 2015." Using the same CenturyLink billing data for end of year 2015, and **only** for the accounts for which CenturyLink counted a Residence Primary Access Line in Lubeck Affidavit, Exh. AL-2:

- A. For each of the Cook, Grand Marais and Tofte exchanges, state the number of residence primary access lines associated with an account to which, (as CenturyLink discussed in its Response to DOC IR 32 a) CenturyLink applied a "rate adjustment" for a "temporary suspension of service".
- B. For each of the Cook, Grand Marais and Tofte exchanges, please identify, in a sortable format, every residential account for which the service address and the billing address are different addresses. For this response, also identify which of these customers received the rate adjustment or temporary suspension of service identified in part (a) of this question. Include the account number and both addresses in your response.

Response:

- A. CenturyLink objects to Request 83A as seeking information not currently available to CenturyLink because it does not maintain the rate adjustment code in its historical billing database, and therefore does not have the capability to respond to this request with respect to 2015 data. Notwithstanding and without waiving this objection, CenturyLink responds that it gathered this information for current subscribers as of February 2017 and identified the following accounts with a rate adjustment for "temporary suspension of service-customer initiated": **[HIGHLY SENSITIVE NOT PUBLIC DATA BEGINS**

SENSITIVE NOT PUBLIC DATA ENDS].

HIGHLY

PUBLIC DOCUMENT - HIGHLY SENSITIVE PROTECTED DATA HAS BEEN EXCISED

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Response Date:
Response by:
Email Address:
Phone Number:

Minnesota Department of Commerce
Information Request

DOCKET Nos.
P-421/AM-16-496
and P-421/
AM-16-547
Gullikson
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Affidavit
Attachment JG-1
Page 2 of 4

Docket Numbers: P421/AM-16-496, P421/AM-16-547 Nonpublic Public
Requested From: CenturyLink Date of Request: 3/15/2017
Response Due: 3/27/2017
Requested by: Bonnie Johnson/Diane Dietz/Joy Gullikson
Email Address(es): bonnie.johnson@state.mn.us
Phone Number(s): 651-539-1880

- B. CenturyLink objects to Request 83B as overly broad and unduly burdensome because it would require CenturyLink to manually match service addresses to billing addresses from its historical billing database. Notwithstanding and without waiving the foregoing, CenturyLink has submitted Confidential Attachment 83B that identifies billing address by account where CenturyLink is aware that billing address would be different than the service address for lines that received an invoice during December 2015. CenturyLink started with the residential primary access line billing file for the three exchanges and eliminated street addresses within the exchanges.

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Response Date:
Response by:
Email Address:
Phone Number:

Minnesota Department of Commerce
Information Request

DOCKET Nos.
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and P-421/
AM-16-547
Gullikson
Supplemental
Affidavit
Attachment JG-1
Page 3 of 4

Docket Numbers: P421/AM-16-496, P421/AM-16-547 Nonpublic Public
Requested From: CenturyLink Date of Request: 3/15/2017
Response Due: 3/27/2017
Requested by: Bonnie Johnson/Diane Dietz/Joy Gullikson
Email Address(es): bonnie.johnson@state.mn.us
Phone Number(s): 651-539-1880

Request Number: 84

Request:

In ¶6 of Mr. Lubeck's November 21, 2016 Affidavit, Mr. Lubeck states, "[t]he number of households is based on the latest United States Census Bureau data, and the primary access lines are based on CenturyLink billing data for end of year 2015."

- A. Admit that the "CenturyLink billing data for end of year 2015" consisted of residential primary access lines in service during the month of December 2015.
- B. For each of the Cook, Grand Marais and Tofte exchanges, admit that CenturyLink's Minnesota customers who choose to seasonally connect service to their vacation property for the summer months and disconnect service for the winter months typically do so prior to December of each year.
- C. For each of the Cook, Grand Marais and Tofte exchanges, admit that the "CenturyLink billing data for end of year 2015" to which Mr. Lubeck refers in ¶ 6 did not include in its count of "primary access lines" seasonally-disconnected vacation property (where "service to seasonally-disconnected vacation property" means service to vacation property of customers who choose to connect service for the summer months and disconnect service for the winter.)
- D. If you deny any of these requests, please fully explain your response, and provide the business records that substantiate the accuracy of your response.

Response:

- A. CenturyLink admits that the "CenturyLink billing data for end of year 2015" consisted of residential primary access lines in service during the month of December 2015.
- B. CenturyLink admits that, regardless of exchange, to the extent there are CenturyLink Minnesota customers who choose to seasonally connect service to their vacation property for the summer months and disconnect service for the winter months, such customers would typically disconnect prior to December of each year.

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Information Request

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AM-16-547
Gullikson
Supplemental
Affidavit
Attachment JG-1
Page 4 of 4

Docket Numbers: P421/AM-16-496, P421/AM-16-547 Nonpublic Public
Requested From: CenturyLink Date of Request: 3/15/2017
Response Due: 3/27/2017
Requested by: Bonnie Johnson/Diane Dietz/Joy Gullikson
Email Address(es): bonnie.johnson@state.mn.us
Phone Number(s): 651-539-1880

- C. CenturyLink admits that it did not include lines that disconnected service prior to December 2015, regardless of whether or not service was later reconnected.
- D. N/A.

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Response Date:
Response by:
Email Address:
Phone Number:

State of Minnesota
DEPARTMENT OF COMMERCE

Nonpublic
Public

Utility Information Request

Docket Numbers: P421/AM-16-496 & P421/AM-16-547 Date of Request: 12/20/2016

Requested From: CenturyLink Response Due: 12/28/2016

Analysts Requesting Information: Bonnie Johnson/Diane Dietz/Joy Gullikson

Type of Inquiry: [].....Financial [].....Rate of Return [].....Rate Design
 [].....Engineering [].....Forecasting [].....Conservation
 [].....Cost of Service [].....CIP [].....Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
32	<p>CenturyLink's tariff located at https://www.centurylink.com/tariffs/mn_gc_ens_t_no_1.pdf describes, starting at page 19, the "Temporary Suspension of Service - Customer Initiated." The tariff describes how customers can suspend service for a period of time and pay 50% of the exchange service charge for all items of service and facilities so suspended (page 21). The CenturyLink USOC finder webpage at http://usocfidfind.centurylinkapps.com/pfl/product/522000 lists the service as:</p> <p>Suspension of the service of a customer is intended to meet the needs of those customers who desire to suspend their telephone service temporarily because generally they, and those whose use of the service is contemplated under the customer's application for service, are to be absent from the premises, but who wish to retain their directory listings and have the other benefits of suspension. Service will be disconnected to the extent necessary to assure that no inward or outward service will be available during the period of suspension. Customers will be charged 50% of the monthly rate if suspension is longer than one month. Business customers may refer calls to another business or residence number; Residence referrals may only go to another residence.</p> <p><i>Continued on next page</i></p>

Response by: _____ List sources of information: _____
Title: _____
Department: _____
Telephone: _____

- a. Please describe how CenturyLink identifies accounts that have a temporary suspension of service. For example, is there a USOC used for these accounts?
- b. Did CenturyLink include these [suspended] access lines associated with residence service, for which it is collecting revenue, in its count for any of the Exhibits provided in Mr. Lubeck's affidavit? If so, identify the exhibits, and if not, by wire center, identify the number of access lines excluded, and provide all documents and work papers related to the calculation of the number of access lines excluded.

If CenturyLink did not include the access lines described above in its count of access lines, provide a detailed explanation as to why not.

Response:

- a. Subject to confirmation from personnel out of the office over the holidays, CenturyLink uses a rate adjustment and does not use a separate USOC to adjust for temporary suspension of service.
- b. CenturyLink objects to Request No. 32(b) to the extent it suggests that receipt of revenue is within the statutory criteria for regulation pursuant to the Statute. Notwithstanding and without waiving this objection, CenturyLink will need to confirm the result once relevant personnel return to the office but it believes that such lines would be included in CenturyLink's access line counts given that there is not a separate USOC for such lines.

Subject to confirmation from personnel out of the office over the holidays, CenturyLink included the access lines described above.

Response by: _____	List sources of information: _____
Title: _____	_____
Department: _____	_____
Telephone: _____	_____

Johnson, Bonnie (COMM)

From: Cynthia Sweet <csweet@acentek.net>
Sent: Tuesday, April 04, 2017 1:23 PM
To: Johnson, Bonnie (COMM)
Subject: RE: Residential voice service in CenturyLink exchanges

Bonnie

See responses below. Let me know if you need any further clarification

Cynthia Sweet
Controller



507-896-6211 phone
507-429-9515 cell
csweet@AcenTek.net
www.AcenTek.net

From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Tuesday, April 4, 2017 9:34 AM
To: Cynthia Sweet <csweet@acentek.net>
Cc: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: Residential voice service in CenturyLink exchanges

Cynthia,
Thank you for your time this morning. Just to confirm:

CenturyLink's Caledonia exchange: Acentek (the CLEC) does offer competitive residential voice services within the City limits of Caledonia but you believe stating that Acentek making voice service available to 1,481 households in the City of Caledonia is greatly exaggerated. I have confirmed with our engineer, 1481 possible households within Caledonia is reasonable for Ace Link- AcenTek CLEC

CenturyLink's Chatfield exchange: Acentek (the CLEC) does not offer any service correct, no services offered

CenturyLink's St. Charles exchange: Acentek (the CLEC) does not offer any service correct, no services offered

CenturyLink's Winona exchange: Acentek (the CLEC) does NOT offer competitive residential voice services in the Winona CenturyLink exchange but you believe stating that Caledonia makes voice service available to 138 households in CenturyLink's Winona exchange is exaggerated. Ace (the ILEC) does have a handful of customers just over the exchange border that receive service via a foreign exchange service. Ace Link –AcenTek(CLEC) does not provide any voice services in Winona to any households

Correct that Ace Telephone Association (ILEC) does have minimal foreign exchange voice customers in Winona exchange

Thanks again Cynthia!

Bonnie
Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880

DOCKET Nos. P-421/AM-16-496 and
P-421/AM-16-547 Gullikson Supplemental
Affidavit Attachment JG-3 Page 2 of 23



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Johnson, Bonnie (COMM)

From: Kevin Kastor <Kevin.Kastor@consolidated.com>
Sent: Tuesday, April 04, 2017 4:27 PM
To: Johnson, Bonnie (COMM)
Subject: RE: Consolidated offering Voice in QC exchanges

Bonnie,

I have given it a cursory review and we may have issues with CenturyLink categorizing us as providing facilities-based residential service in all 8 wire centers they listed. As I mentioned on the phone, our CLEC only offers business class service in some markets. I have sent the file to Engineering for validation and hope to have something back from them in a couple days.

KEVIN J. KASTOR | Manager – Regulatory & Legislative Affairs
D: 936.788.7420 | C: 214.616.4121
kevin.kastor@consolidated.com
consolidated.com | NASDAQ: CNSL



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From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Tuesday, April 04, 2017 4:09 PM
To: Kevin Kastor <Kevin.Kastor@consolidated.com>
Cc: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: RE: Consolidated offering Voice in QC exchanges

Greetings Kevin!
I wondered if you had a chance to review the data.

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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From: Johnson, Bonnie (COMM)
Sent: Tuesday, April 04, 2017 7:21 AM
To: kevin.kastor@consolidated.com
Cc: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: RE: Consolidated offering Voice in QC exchanges

Kevin I am not sure I have shared this with you, but CenturyLink used a Centroid method to determine households in census blocks that cross over exchanges of two ILECs. We have found in many cases this is what caused CenturyLink to state that an ILEC serves in the neighboring CenturyLink exchange. This may very well be the case with Consolidated if you are wondering how this occurred.

I hope this helps!

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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From: Johnson, Bonnie (COMM)
Sent: Monday, April 03, 2017 1:58 PM
To: 'kevin.kastor@consolidated.com' <kevin.kastor@consolidated.com>
Cc: Bonnie Johnson (bonnie.johnson@state.mn.us) <bonnie.johnson@state.mn.us>
Subject: Consolidated offering Voice in QC exchanges

Kevin,
Thanks for your time and assistance. The Department of Commerce (Department) is attempting to determine if Consolidated Communications offers voice service to residential customers in the exchanges identified in the attached

spreadsheet. I have also attached the Statute with the definition of Competitive Service Provider in the event it may be helpful for you.

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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Johnson, Bonnie (COMM)

From: Greg Arvig <garvig@nextera.net>
Sent: Tuesday, April 04, 2017 4:15 PM
To: Johnson, Bonnie (COMM)
Subject: RE: Nextera lines

Bonnie,

We have 0 (zero) facility based residential customers in the markets outlined in your report.

Greg

From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Tuesday, April 04, 2017 3:08 PM
To: Greg Arvig
Cc: Johnson, Bonnie (COMM)
Subject: Nextera lines

Greg,

Thanks so much for your help! I have attached the spreadsheet with the Nextera data and the new Statute! Call if you have questions.

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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Johnson, Bonnie (COMM)

From: Cheryl Scapanski <cscapanski@bctelco.net>
Sent: Friday, March 31, 2017 3:58 PM
To: Johnson, Bonnie (COMM)
Subject: RE: Benton Voice Service

That is correct

Cheryl

From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Friday, March 31, 2017 3:42 PM
To: Cheryl Scapanski <cscapanski@bctelco.net>
Cc: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: Benton Voice Service

Good afternoon Cheryl,
Thank you for your time today. I want to confirm I understand our conversation. You stated that Benton Cablevision does not offer any voice service at all, and that Benton Cooperative Telephone Company does not offer voice service outside of its ILEC territory.

Is that correct?

Thanks again Cheryl,

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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Johnson, Bonnie (COMM)

From: Steve Katka <skatka@albanytel.com>
Sent: Monday, April 03, 2017 8:43 AM
To: Johnson, Bonnie (COMM)
Cc: Tom Burns
Subject: Re: Voice service

Bonnie:

Regarding your questions from our discussion this morning, Albany Mutual Telephone Association does not offer residential voice services in the Century Link exchanges of Avon, Holdingford and St Joseph..

Steve Katka

On Monday 03/04/2017 at 7:49 am, "Johnson, Bonnie (COMM)" wrote:

Good morning Steve and thanks again for your time this morning. I am confirming our discussion that Albany Mutual Telephone Association does not offer any voice service in the CenturyLink exchanges of Avon, Holdingford and St. Joseph.

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880

[Image]

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Johnson, Bonnie (COMM)

From: TEC Manager <tecmanager@bvillemn.net>
Sent: Monday, April 03, 2017 1:02 PM
To: Johnson, Bonnie (COMM)
Subject: RE: Voice in Sabin

Hi Bonnie,

That is correct, Barnesville Municipal Telephone does not offer voice service in the CenturyLink exchange of Sabin.

Thanks,
Guy Swenson
TEC Manager
City of Barnesville; like us on Facebook
<http://www.facebook.com/#!/barnesville>
218-354-2723 ph
218-354-2472 fax

From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Monday, April 03, 2017 8:16 AM
To: tecmanager@bvillemn.net
Cc: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: Voice in Sabin

Good morning Guy and thanks again for your time this morning. I am just confirming that Barnesville Municipal Telephone does not offer voice service in the CenturyLink exchange of Sabin.

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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Johnson, Bonnie (COMM)

From: Bohler, Scott <Scott.Bohler@FTR.com>
Sent: Monday, April 03, 2017 10:00 AM
To: Johnson, Bonnie (COMM)
Subject: RE: Voice service in QC exchanges

Bonnie-
Correct, Frontier does not provide voice service outside its ILEC footprint; we do not operate as a CLEC.

Scott

Scott Bohler
Manager, Government and External Affairs
(952) 491-5534 (o)
(612) 562-7183 (c)

From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Monday, April 03, 2017 9:55 AM
To: Bohler, Scott
Cc: Johnson, Bonnie (COMM)
Subject: Voice service in QC exchanges

Hi Scott,
Thanks for your time. I am confirming our conversation in which you said that Frontier does not offer service outside of its ILEC territory in MN. The exchanges which CenturyLink has identified Frontier as offering voice service in QC exchanges are likely areas where Frontier and CenturyLink QC each serve a portion of the census block (the census block is in both QC and Frontier territory).

Did I understand that correctly?

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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This communication is confidential. Frontier only sends and receives email on the basis of the terms set out at http://www.frontier.com/email_disclaimer.

DOCKET Nos. P-421/
AM-16-496 and P-421/
AM-16-547 Gullikson
Supplemental Affidavit
Attachment JG-3 Page 11 of 23

Johnson, Bonnie (COMM)

From: Elizabeth Tierney <Elizabeth.Tierney@globalcapacity.com>
Sent: Monday, April 03, 2017 2:44 PM
To: Johnson, Bonnie (COMM)
Subject: RE: Global Capacity voice service

Bonnie,

That is correct.

Take Care!

Liz Tierney

Director – External Affairs
Global Capacity
7600 East Orchard Road
Greenwood Village, CO 80111
O. 303-290-7623 C. (720) 233-8583
E. Elizabeth.Tierney@globalcapacity.com

Follow us on Twitter @Global_Capacity
Learn more about us at www.globalcapacity.com

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From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Monday, April 3, 2017 1:00 PM
To: Elizabeth Tierney <Elizabeth.Tierney@globalcapacity.com>
Cc: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: Global Capacity voice service

Hi Liz,

Thanks for your time today. Per our conversation, I am confirming that Global Capacity does not offer voice service in the State of Minnesota.

Thanks again,

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



DOCKET Nos. P-421/AM-16-496 and
P-421/AM-16-547 Gullikson
Supplemental Affidavit Attachment JG-3
Page 13 of 23

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Johnson, Bonnie (COMM)

From: Michael Baso <michael.baso@arvig.com>
Sent: Monday, April 03, 2017 5:14 PM
To: Johnson, Bonnie (COMM)
Subject: Re: East Ottertail Residential Voice Service

Thanks for the call, Bonnie. Just to confirm again what we discussed on the phone, no Arvig LEC companies are providing or are intending to provide voice services in CenturyLink areas. We have one of our CLEC companies, Tekstar that has authority in some of those areas so that is the company we use when providing service. It is most likely the situation we discussed, where there are overlapping territories. Just for example, Osage - that is an EOT area and is very close to Park Rapids which is a CenturyLink area. Below is the list of the Arvig LECs I see, which would all have the same answer as we just talked about. I do see our two CLECs (in bold) on there too, though, which do provide voice in CL areas. If you do need anything else though, let me know and I'll see what I can track down for you. Thanks for your time, have a great day!

Arrowhead Communications Corporation
Callaway Telephone Company Inc
East Otter Tail Telephone Company
Felton Telephone Company Inc
Home Telephone Company
Loretel
Mainstreet Communications (CLEC, we do provide voice in Sauk Centre)
Melrose Telephone Company
Midwest
Osakis
Peoples Telephone Company
Redwood County Telephone Company
Tekstar (CLEC, we do provide voice in multiple CL areas)
Twin Valley Ulen Telephone Co.

Michael Baso
Product & Business Development Supervisor
Arvig | 218.346.8124 | www.arvig.com



On Mon, Apr 3, 2017 at 4:50 PM, Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us> wrote:

Bonnie Johnson

Telecommunications Analyst

Minnesota Department of Commerce

85 7th Place East, Suite 280, Saint Paul, MN 55101

P. 651-539-1880

DOCKET Nos. P-421/
AM-16-496 and P-421/
AM-16-547 Gullikson
Supplemental Affidavit
Attachment JG-3 Page 15 of 23



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From: Michael Baso [mailto:michael.baso@arvig.com]
Sent: Monday, April 03, 2017 4:47 PM
To: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Cc: Loretta Tastad <loretta.tastad@arvig.com>
Subject: Re: East Ottertail Residential Voice Service

Hi, Bonnie,

Loretta sent this over to me to see if I can help. Can you provide more information to me on this? There are certain areas in Tekstar and EOT where addresses overlap so I'm sure that's what is happening here but I would need a list of addresses and more information on what CenturyLink is referencing to find out for sure. I can tell you that we certainly have no intention or desire to provide EOT service in Tekstar/CenturyLink areas.

Thank you

Michael Baso

Product & Business Development Supervisor

Arvig | [218.346.8124](tel:218.346.8124) | www.arvig.com

----- Forwarded message -----

From: **Johnson, Bonnie (COMM)** <bonnie.johnson@state.mn.us>
Date: Mon, Apr 3, 2017 at 3:44 PM
Subject: East Ottertail Residential Voice Service
To: "loretta.tastad@arvig.com" <loretta.tastad@arvig.com>
Cc: "Johnson, Bonnie (COMM)" <bonnie.johnson@state.mn.us>

Good afternoon Loretta,

Thank you for your time. This is a follow-up to our conversation confirming that East Ottertail does not offer voice service to residential customers in the Qwest Corporation exchanges of Battle Lake, Cass Lake, Detroit Lakes, Henning, Park Rapids, Staples and Wadena.

Bonnie

Bonnie Johnson

Telecommunications Analyst

Minnesota Department of Commerce

85 7th Place East, Suite 280, Saint Paul, MN 55101

P. [651-539-1880](tel:651-539-1880)



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DOCKET Nos. P-421/
AM-16-496 and P-421/
AM-16-547 Gullikson
Supplemental Affidavit
Attachment JG-3 Page 17 of
23

--

Loretta Tastad

Arvig Communication Systems

218-346-8446

loretta.tastad@arvig.com

Johnson, Bonnie (COMM)

From: Gary Johnson <gjohnson@paulbunyan.net>
Sent: Tuesday, April 04, 2017 8:03 AM
To: Johnson, Bonnie (COMM)
Subject: Re: Additional CL exchanges

Good morning Bonnie,

Yes, Paul Bunyan operates as a CLEC in all of the areas you listed and we do offer local voice services in each.

Thanks,
Gary



Gary Johnson
CEO/General Manager
1831 Anne St NW
Bemidji, MN 56601

Email:
gjohnson@paulbunyan.net
Phone: (218) 444-1234
Toll-Free: (888) 586-3100
Fax: (218) 333-0186
Direct: (218) 444-1128

On Apr 4, 2017, at 7:28 AM, Johnson, Bonnie (COMM) <Bonnie.Johnson@state.mn.us> wrote:

Good morning Gary!

There are additional exchanges which CenturyLink states Paul Bunyan is providing residential voice service in besides Bemidji. The Department has determined that a method CenturyLink used to determine households in census blocks that cross over into another ILECs territory may have resulted in CenturyLink reporting the ILEC serves customers in its exchange when in fact they do not.

Based on our conversation yesterday, can you confirm whether Paul Bunyan *offers* residential voice service to households (HHs) in the following exchanges?

Grand Rapids 6827 HHs
Park Rapids 2054 HHs
Bass Brook 871 HHs
Coleraine 646 HHs
Cass Lake 1368 HHs

Thanks again for your help Gary!

Bonnie

Bonnie Johnson

Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880

DOCKET Nos. P-421/
AM-16-496 and P-421/
AM-16-547 Gullikson
Supplemental Affidavit
Attachment JG-3 Page 19 of 23

<image001.jpg>

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Department Note: The Department redacted the email responses from Winnebago Cooperative Telecom Association and Park Region Mutual Telephone Co., as fiber drops and the number of residential customers receiving service do not directly reflect the number of households in the CenturyLink exchange that may choose to receive service. CenturyLink's methodology, which assumes if a carrier provides broadband to one household in a census block, it makes voice service available to all households in the census block, will always be a greater number than actual drops or customers served. This note was not part of the email string with either company.

From: Mark Thoma [mailto:markthoma@wctatel.com]
Sent: Tuesday, April 04, 2017 9:56 AM
To: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: RE: Albert Lea and Glenville Drops Buried

Bonnie,

No, this would be a combination of business and residential. Most in the urban are business and most in the rural are residential. I am unable to give you exact numbers.

Thank you,

Mark Thoma
General Manager
Winnebago Cooperative Telecom Association
704 E Main
Lake Mills, IA 50450
641-592-7622

www.wctatel.net

From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Tuesday, April 04, 2017 9:54 AM
To: Mark Thoma
Subject: RE: Albert Lea and Glenville Drops Buried

Thank you so much Mark! Are these all residential?

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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From: Mark Thoma [<mailto:markthoma@wctatel.com>]
Sent: Tuesday, April 04, 2017 9:36 AM
To: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: FW: Albert Lea and Glenville Drops Buried

Bonnie,

Per our discussion, I have included the number of fiber drops buried in each Minnesota exchange broken out by rural and urban. Please let me know if you have any questions.

Number of fiber drops buried capable of both voice and data:

- Albert Lea
 - Urban [Trade Secret Data redacted]
 - Rural [Trade Secret Data redacted]

- Glenville
 - Urban [Trade Secret Data redacted]

 - Rural [Trade Secret Data redacted]

Thank you,

Mark Thoma
General Manager
Winnebago Cooperative Telecom Association
704 E Main
Lake Mills, IA 50450
641-592-7622

www.wctatel.net

From: Dave Bickett [mailto:dave.bickett@parkregion.com]
Sent: Monday, April 03, 2017 11:05 AM
To: Johnson, Bonnie (COMM) <bonnie.johnson@state.mn.us>
Subject: RE: Battle Lake and Fergus Falls QC exchanges

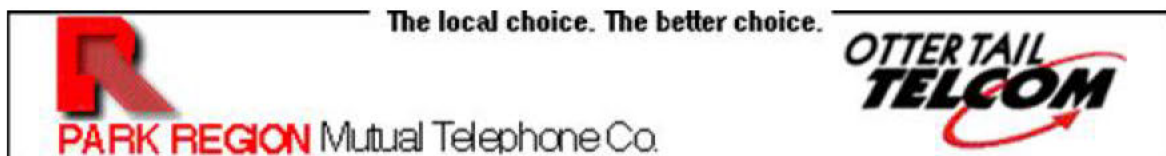
Hi Bonnie.

For Battle Lake, Otter Tail Telcom provides for about [Trade Secret Data redacted] residential customers today over its own facility. At the end of 2017, we will be adding another [Trade Secret Data redacted]

For Fergus Falls, I would say once we complete this year's Broadband grant their number is pretty accurate for Otter Tail Telcom.

Park Region does not provide service in either Battle Lake or Fergus Falls.

Dave Bickett, GM/CEO
Park Region Mutual Telephone/Otter Tail Telcom/Valley Telephone
Phone: 218-826-8311



From: Johnson, Bonnie (COMM) [mailto:bonnie.johnson@state.mn.us]
Sent: Monday, April 03, 2017 10:51 AM
To: dave.bickett@parkregion.com
Cc: Johnson, Bonnie (COMM)
Subject: Battle Lake and Fergus Falls QC exchanges

Hi Dave,

I would like to confirm our conversation. You stated that for the QC exchange of Battle Lake, Park Region (237 households identified) does not provide any residential voice service at all. Ottertail Telecom (585 households identified) does provide service on Main Street to businesses using fiber,

however, if Ottertail Telecom provides voice service to residential customers it does so using QC loops and not Ottertail facilities.

As to Fergus Falls, Ottertail Telecom does provide residential voice service but you stated you cannot identify how many households it offers service to (so the CenturyLink number of households of 7,670 is likely overstated but you cannot determine by how much) and Park Region (263 households identified) does not offer voice service.

Is that correct?

Thanks,

Bonnie

Bonnie Johnson
Telecommunications Analyst
Minnesota Department of Commerce
85 7th Place East, Suite 280, Saint Paul, MN 55101
P. 651-539-1880



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STATE OF MINNESOTA

SUITE 1800
445 MINNESOTA STREET
ST. PAUL, MN 55101-2134
TELEPHONE: (651) 297-2040

April 5, 2017

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

Re: Qwest Corporation d/b/a CenturyLink QC's Petition to be Regulated Pursuant to Minn. Stat. § 237.025: Competitive Market Regulation
Docket No. P421/AM-16-496
Docket No. P-421/AM-16-547 (Highly Sensitive Trade Secret)

Dear Mr. Wolf:

Enclosed for filing in the above dockets on behalf of the Minnesota Department of Commerce, please find Supplemental Affidavit of Joy Gullikson-**HIGHLY SENSITIVE TRADE SECRET**, as well as a redacted Public version.

Sincerely,

s/ **Linda S. Jensen**

Linda S. Jensen
Atty. Reg. No. 0189030

445 Minnesota Street, Suite 1800
St. Paul, MN 55101-2134
Telephone: (651) 757-1472
Fax: (651) 297-1235
linda.s.jensen@ag.state.mn.us

Attorney for Minnesota
Department of Commerce

Enclosure
cc: Service List

SERVICE LIST

Electronic Service Member(s)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Ahearn	Francis X	fahearn@bcmone.com	McGraw Communications, Inc.	Electronic Service	No
Alciati	Marc	malciati@intellectrace.com	Intellectrace, inc	Electronic Service	No
Anderson	Kristine	kanderson@jagcom.net	Jaguar Communications, Inc.	Electronic Service	No
Anderson	Julia	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Antoniou	Chris	christos.t.antoniou@one.verizon.com	MCImetro Access Transmission Services LLC	Electronic Service	No
Artale	Ross	rartale@spectrotel.com	Spectrotel, Inc.	Electronic Service	No
Bailey	David	dbailey@bullseyetelecom.com	BullsEye Telecom, Inc.	Electronic Service	No
Bernard	Barbara	bbernard@popp.com	POPP.com, Inc.	Electronic Service	No
Beyer	Kevin	mnpucnotices@fedtel.net	Federated Telephone Cooperative	Electronic Service	No
Beyer	Kevin	kbeyer@fedtel.net	Farmers Mutual Telephone Company	Electronic Service	No
Bickett	David	dave.bickett@parkregion.com	Otter Tail Telcom	Electronic Service	No
Billek, Esq.	Carl	carl.billek@idt.net	IDT America Corp.	Electronic Service	No
Birkholz	Mark	mark.birkholz@arvig.com	Redwood County Telephone Company	Electronic Service	No
Bornhoff	Barb	barbbornhoff@nu-telcom.net	NU-Telecom	Electronic Service	No
Boshoven	Barbara	bboshoven@ussignalcom.com	US Signal Company, L.L.C.	Electronic Service	No
Brinkman	Paul	paulb@nesc.k12.mn.us	Northeast Service Cooperative	Electronic Service	No
Brown	Jenna	jbrown@vcomsolutions.com	QuantumShift Communications, Inc	Electronic Service	No
Browning	Diane	diane.c.browning@sprint.com	Sprint Corporation	Electronic Service	No
Buley	Mary	mary.buley@onvoy.com	Onvoy, LLC	Electronic Service	No
Burton	Kristin	Kristin.Burton@vastbroadband.com	Vast Broadband	Electronic Service	No
Cash	Tony	legal@365wireless.net	365 Wireless, LLC	Electronic Service	No
Chapman	Austin	communicationonlinefiling@avalara.com	Avalara, Inc.	Electronic Service	No
Chavez	Linda	linda.chavez@state.mn.us	Department of Commerce	Electronic Service	Yes
Chinwah	EK	ek@mymti.com	Midwestern Telecommunications, Inc.	Electronic Service	No
Choroser	Beth	beth_choroser@comcast.com	Comcast Business Communications, Inc.	Electronic Service	No
Christensen	Brent	bchristensen@mnta.org	Minnesota Telecom Alliance	Electronic Service	No
Christiansen	Brett	brett.christiansen@arvig.com	Arvig	Electronic Service	No
Cookman	Geoff	regulatory@granitenet.com	Granite Telecommunications, LLC	Electronic Service	No
Cox	Rod	rod.cox@tdsmetro.com	TDS Metrocom	Electronic Service	No
Cullender	Doka	caudle@att.com	Teleport Communications America, LLC	Electronic Service	No
Cusack	Paul	pcusack@voxbeam.com	Voxbeam Telecommunications Inc. dba Magic Telecom	Electronic Service	No
Department	Regulatory	Regulatory.dept@birch.com	Cbeyond	Electronic Service	No
Department	Legal	legal@granitenet.com	Granite Telecommunications LLC	Electronic Service	No
Dienhart	Mike	Mike.Dienhart@uscellular.com	United States Cellular Corporation	Electronic Service	No
Dieringer	Shannon	sdieringer@firstcomm.com	First Communications LLC	Electronic Service	No
Dodge	Tim	tim.dodge@clearfly.net	Greenfly Networks, Inc. dba Clearfly Communications	Electronic Service	No
Economou	Andoni	aeconomou@mettel.net	Metropolitan Telecommunications of Minnesota, Inc.	Electronic Service	No
Elliott	Tim	timelliott@nu-telecom.net	Hutchinson Telecommunications Inc.	Electronic Service	No
Elwood	Ron	relwood@mnlsap.org	Mid-Minnesota Legal Aid	Electronic Service	No
Fenker	Steven	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	Electronic Service	No
Firestein	Terri	tfireccg@myactv.net	RS Fiber Cooperative	Electronic Service	No
Firstman	Cynthia	cat@airespring.com	Airespring, Inc.	Electronic Service	No
Fleming	Bryan	bryan.fleming@t-mobile.com	T-Mobile USA, Inc.(PARTY)	Electronic Service	No
Forst	Charles	charles.forst@zayo.com	Zayo Group, LLC	Electronic Service	No
Freeman	Lisa Jill	ljfreeman@bandwidth.com	Bandwidth.com CLEC, LLC	Electronic Service	No

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Gleason	Jim	jgleason@claritycomm.net	Clarity Telecom, LLC	Electronic Service	No
Gratz	Emerald	emerald.gratz@state.mn.us	Office of Administrative Hearings	Electronic Service	Yes
Grewe	Jennifer	jenniferg@wcta.net	West Central Telephone Assoc	Electronic Service	No
Gustas	Brian	bgustas@matrixbt.com	Matrix Telecom, Inc.	Electronic Service	No
Halm	K.C.	kchalm@dwt.com	Davis Wright Tremaine LLP	Electronic Service	No
Harper	Jarrold	jharper@broadviewnet.com	Broadview Networks Inc	Electronic Service	No
Harrington	John	jharrington@inteliquent.com	Neutral Tandem-Minnesota	Electronic Service	No
Heaston	Donna	Donna.Heaston@electriclightwave.com	Integra Telecom of Minnesota, Inc.	Electronic Service	No
Hickle	James	jim.hickle@velocitytelephone.com	Velocity Telephone Inc	Electronic Service	No
Hoke	Angela	Angela.Hoke@birch.com	Ionex Communications North, Inc. dba Birch Communications	Electronic Service	No
Hollick	Pamela	Pamela.Hollick@Level3.com	Level 3 Communications, LLC	Electronic Service	No
Hopkins	Kevin	khopkins@telephoneassociates.com	Telephone Associates, Inc.	Electronic Service	No
Isaacs	Kim	kdisaacs@integratelecom.com	Integra Telecom, Inc.	Electronic Service	No
Jennings	John	jjennings@bigrivertelephone.com	Big River Telephone Company, LLC	Electronic Service	No
Jensen	Bill	bjensen@mediacomcc.com	Mediacom Minnesota LLC	Electronic Service	No
Jensen	Linda	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Jergenson	Sherry	sjergenson@acentek.net	Ace Link Telecommunications Inc	Electronic Service	No
Johnson	Gary	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	Electronic Service	No
Jones	Ward	ward.jones@bestbuy.com	BBY Networks, Inc	Electronic Service	No
Kangas	Laura	lkangas@palmerwireless.com	Palmer Wireless, LLC	Electronic Service	No
Katka	Steve	skatka@albanytel.com	Albany Mutual Telephone Association	Electronic Service	No
King	Adam	dialupmaster@youbetnet.net	KTF Telcom Inc	Electronic Service	No
Kissel	Jeremy	regulatory@globalcapacity.com	GC Pivotal, LLC	Electronic Service	No
Knowles	Rex	Rex.Knowles@xo.com	XO Communications Services, Inc.	Electronic Service	No
Knuth	Kenneth	k.knuth@fecinc.com	Woodstock Telephone Company	Electronic Service	No
Kolezynski	Jim	jkolezynski@eastontelecom.com	Easton Telecom Services, L.L.C.	Electronic Service	No
Korn	Jeff	jkorn@storesonline.com	Crexendo Business Solutions, Inc.	Electronic Service	No
Koxlien	Tim	tim@telequality.com	TeleQuality Communications, Inc.	Electronic Service	No
Kuhn	Deborah L.	deborah.kuhn@verizon.com	Verizon Wireless	Electronic Service	No
Larson	Kevin	klarson@ctctelcom.com	Consolidated Telephone Company	Electronic Service	No
Lawson	Bret	bret.lawson@sprint.com	Sprint/Nextel Corp.	Electronic Service	No
Lindell	John	john.lindell@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Livingston	Andi	Andrea.livingston@midco.com	Midcontinent Communications	Electronic Service	No
Lockett	Colleen	regulatory@intrado.com	Intrado Communications Inc.	Electronic Service	No
Lohrenz	Greg	gregl@aitech.net	Advanced Integrated Technologies	Electronic Service	No
Loken	Timothy	Tim.P.Loken@windstream.com	Windstream Communications, Inc.	Electronic Service	No
Lund	Kathy	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	Electronic Service	No
McCausland	Robert W.	robert.mccausland@h3net.com	Hypercube Telecom, LLC	Electronic Service	No
McClintock	Brian	BMcClintock@tncii.com	TNCI Operating Company LLC	Electronic Service	No
McDonough	Laurie	laurie.mcdonough@acninc.com	ACN Communication Services, Inc.	Electronic Service	No
McIntyre	Brian	brian.mcintyre@dish.com	dishNET Wireline L.L.C.	Electronic Service	No
Mendoza	Anthony	tony@mendozalawoffice.com	Mendoza Law Office, LLC	Electronic Service	No
Meradith	Stephen	Stephen.Meradith@windstream.com	Windstream	Electronic Service	No
Moore	Michael R.	michael.moore@charter.com	Charter Communications, Inc.	Electronic Service	No
Murphy	Lance	lance.murphy@verizonwireless.com	Verizon Wireless	Electronic Service	No
Nelson	Glen	regulatory@nhcgrp.com	New Horizons Communications Corp.	Electronic Service	No
Nipps	Lyndall	WCI.Minnesota.govaffairs@windstream.com	McLeodUSA Telecommunications Services, LLC	Electronic Service	No

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Nisbet	Steve	snisbet@whe.org	WH Link	Electronic Service	No
Nussbaum	Jerry	preferred@aol.com	Preferred Long Distance, Inc.	Electronic Service	No
O'Flaherty	Matt	oflaherty.matt@gmail.com	SelecTel, Inc.	Electronic Service	No
Olsen	Dan	dano@windom-mn.com	City of Windom	Electronic Service	No
Orcutt	Mike	mgorcutt@ntt-services.com	Nebraska Technology & Telecommunications, In.	Electronic Service	No
Osborne	Doug	dosborne@localaccessllc.com	Local Access LLC	Electronic Service	No
Paananen	Sheila	sp1484@att.com	AT&T National Access Management	Electronic Service	No
Palmer Denig	Jessica	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	Electronic Service	Yes

Paper Service Member(s)

Last Name	First Name	Company Name	Address	Delivery Method	View Trade Secret
Bertsch	John	Augeo Communications, LLC	2561 Territorial Road, St. Paul, MN-55114	Paper Service	No
Birkholz	Mark	Mainstreet Communications, LLC	150 Second St. SW, Perham, MN-56573	Paper Service	No
Brown	Johnny	Gazelle Link, LLC	1450 Boyson Road, Bldg. C 3-A, Hiawatha, IA-52233	Paper Service	No
Hanson	Bruce	Clara City Telephone Company	1700 Technology Dr Ste 100, Willmar, MN-56201	Paper Service	No
Hollick	Pamela	Broadwing Communications, LLC	4625 W 86th St Ste 500, Indianapolis, IN-46268	Paper Service	No
Knegendorf	Larry	Baldwin Broadband, LLC	930 Maple Street, Baldwin, WI-54002	Paper Service	No
Lienau	James W.	New-Cell, Inc.	PO Box 19079, 450 Security Blvd., Green Bay, WI-543079079	Paper Service	No