

August 30, 2017

**PUBLIC DOCUMENT**

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

RE: **PUBLIC Comments of the Minnesota Department of Commerce**  
Docket No. P999/PR-17-08

Dear Mr. Wolf:

Attached are the PUBLIC comments of the Minnesota Department of Commerce (Department) in the following matter:

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

The Department's recommendation is contained herein. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ JOY GULLIKSON  
Telecommunications Analyst

/s/ DIANE DIETZ  
Telecommunications Analyst

JG/DD/lt  
Attachment



PUBLIC DOCUMENT

## Before the Minnesota Public Utilities Commission

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### PUBLIC Comments of the Minnesota Department of Commerce

Docket No. P999/PR-17-08

#### I. HISTORICAL BACKGROUND

Section 254(e) of the Telecommunications Act of 1996 provides that a carrier who receives universal service support must use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

On May 23, 2001, the FCC issued its Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45,<sup>1</sup> adopting rules governing the distribution of support to rural carriers. Among other things, the FCC concluded that states should file annual certifications with the FCC to ensure that rural and non-rural carriers receiving universal service fund support use that support only for the provision, maintenance and upgrading of facilities and services, for which the support is intended, consistent with section 254(e).

On December 23, 2002, the Minnesota Public Utilities Commission (Commission) issued an Order in Docket No. P999/M-02-1403, setting forth requirements that each ETC receiving universal support must file an affidavit from a corporate officer stating that any Universal Service Funds received would be used only for their intended purpose, and documentation regarding the previous year's receipt of subsidies from the Universal Service Fund and the company's operating and capital expenditures.

On March 17, 2005, the Federal Communications Commission released a Report and Order in the Matter of the Federal-State Joint Board on Universal Service.<sup>2</sup> In the Order, the FCC adopted additional "mandatory requirements for ETC designation proceedings in which the [Federal Communications] Commission acts pursuant to section 214(e)(6)<sup>3</sup> of the Communications Act of 1934, as amended."<sup>4</sup>

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<sup>1</sup> In the Matter of Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, May 23, 2001.

<sup>2</sup> 47 U.S.C §254(e).

<sup>3</sup> Section 214(e) (6) provides for FCC designation of eligible telecommunications carriers in cases in which the carriers are not subject to the jurisdiction of a state commission.

<sup>4</sup> In the Matter of the Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order*, March 17, 2005, para. 1.

On July 21, 2005, in Docket No. P999/M-05-741, the Commission issued an Order incorporating into its future annual certification process (beginning with petitions filed by ETCs in 2006) the filing requirements set forth by the FCC in CC Docket 96-45, FCC 05-46, with modifications.

On November 18, 2011, the FCC released its Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Connect America, et al. in WC Dockets No. 10-90, 07-135, 03-109, and 10-208, GN Docket No. 09-51, CC Dockets 09-92 and 96-45, and WT Docket No 10-208 (CAF-ICC Order), which comprehensively reformed universal service and intercarrier compensation mechanisms. Among other things, the CAF-ICC Order addressed annual Section 254(e) certification by states (with respect to the ETCs they have designated). The FCC extended its current reporting requirements (previously codified in 47 C.F.R. §54.209) to all ETCs, including those designated by states, incorporated new reporting requirements, and codified the reporting requirements in new section 54.313 of its rules.

On April 11, 2014, the Commission issued an Order, modifying the schedule for future annual certifications as follows:

July 1	Deadline for ETCs to file petitions and supporting documentation, including the information required by FCC Form 481
September 1	Deadline for comments by the Department, OAG, and other interested persons.
September 8	Deadline for replies

On March 30, 2016, the FCC released its Rate-of-Return Reform Order,<sup>5</sup> in which the FCC created a model-based funding mechanism for rate-of-return carriers and asked carriers to choose between the new cost model and a modified version of the existing support system.

Some highlights of the FCC's actions in the fall and winter of 2016 include:

- Rate of return companies can choose to elect the new Alternative Connect America Model (A-CAM). Those companies will receive a set amount of monthly support over 10 years and will need to meet defined build-out obligations based upon the number of locations existing in a census block, thus removing the funding association with access line.<sup>6</sup>

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<sup>5</sup> FCC's Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, In the Matter of the Connect America Fund, ETC Annual Reports and Certifications, Developing a Unified Intercarrier Compensation Regime, WC Docket No. 10-90 et al, released March 30 2016. See [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-33A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-33A1.pdf)

<sup>6</sup> See <http://www.usac.org/hc/about/outreach/newsletters/2016/08-2016.aspx>

- Carriers can choose to stay with the modified legacy funding mechanism, but if they receive funding they are required to meet deployment obligations that are calculated using data submitted by carriers.

The National Exchange Carrier Association (NECA) explained A-CAM as follows:<sup>7</sup>

By choosing the model, an RLEC is opting for incentive regulation for its common line and consumer broadband-only loop offerings and, as a result, these services will no longer be subject to rate-of-return regulation. Also, these carriers will receive all their high cost support from the model - they no longer will qualify for High Cost Loop Support and ICLS. Some details include:

- The model will have a \$200 per-location funding cap to provide support for locations above a funding benchmark of \$52.50. The per-location funding cap can be reduced for budget control purposes. Note: Pursuant to further FCC order, the per-location cap was reduced to \$146.10<sup>8</sup>.
- Initial model election is irrevocable if funding can be supplied with the additional reserves to meet the \$200 per-location funding cap. Only if the per-location funding cap is reduced can companies reverse this election. Note: the funding was reduced, but the companies have by now committed or reversed.
- *Carriers will have to make a statewide election for all their companies within a state. [Emphasis added.]*
- Census blocks where the carrier is providing 10/1 Mbps or better broadband using either fiber to the premises or cable technologies, based on June 2015 FCC Form 477 data, will be excluded entirely and will not receive support. The same is true for census blocks where an unsubsidized competitor is offering qualifying service. In addition, carriers offering 10/1 Mbps or better to 90 percent or more of their eligible

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<https://www.neca.org/articlelistprintable.aspx?listsetupid=12998&listid=26972&archivemonth=04&archiveyear=2016>

<sup>8</sup> FCC's Report and Order, Order and Further Notice of Proposed Rulemaking, In the Matter of the Connect America Fund, WC Docket No. 10-90 et al, released December 20 2016. See [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-33A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-33A1.pdf)

locations in their study area/state are precluded from selecting the model.

- Carriers accepting the model will be required to maintain existing voice and broadband service and offer at least 10/1 Mbps to all locations fully funded by the model. Additional obligations apply to partially funded locations.

In its May 2016 High Cost reporter on the High Cost Program, USAC stated as follows:<sup>9</sup>

Carriers may alternatively elect to continue receiving legacy support. However, broadband requirements will be added. Specifically, ICLS will be renamed Connect America Fund Broadband Loop Support (CAF BLS), which will include support for broadband-only lines (as well as voice and voice/broadband lines). CAF BLS will provide cost recovery for the difference between a carrier's loop costs associated with providing broadband-only service (the "consumer broadband-only loop revenue requirement") and its consumer broadband-only loop revenues.

CAF BLS will provide support (replacing traditional ICLS) for voice and voice/data service as well as add support for standalone broadband service, which has not been supported in the past. NECA explained CAF BLS as follows:<sup>10</sup>

Also different from existing support processes, the Order implements some operating expense limits, capital expenditure allowances, and applies a budgetary control to be applied to the High Cost Loop Support and CAF BLS mechanisms to ensure the overall \$2 billion cap is not exceeded. *CAF BLS support recipients will also have buildout obligations based on a percentage of their projected BLS to be received over five years.* [Emphasis added.]

Finally, the Order prohibits CAF BLS support in census blocks served by a qualifying unsubsidized competitor. There will, however, be a challenge process to determine which areas are in fact served by a qualifying unsubsidized competitor, in which the competitor will bear the burden of proof to show they are a qualified competitor serving 85 percent of the locations in a census block. There are also

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<sup>9</sup> See <http://www.usac.org/hc/about/outreach/newsletters/2016/05-2016.aspx>

<sup>10</sup>

<https://www.neca.org/articlelistprintable.aspx?listsetupid=12998&listid=26972&archivemonth=04&archiveyear=2016>

several options for disaggregating BLS support where bonafide competition exists. High Cost Loop Support is not subject to reduction in competitive locations.

## **II. PROCEDURAL BACKGROUND**

Between June 15, 2017 and August, 2017, Form 481 filings were received from Eligible Telecommunications Carriers (ETCs) in receipt of high cost funding, seeking certification from the Commission that they have and will use high cost support received from the Federal Universal Service Fund only for the provision, maintenance, and upgrading of facilities and services for which the support is intended (Attachment 1). In addition, between June 15, 2017 and August 17, 2017, the Lifeline-only ETCs, subject to the reporting requirements of 47 C.F.R. 54.422, filed copies of their Form 481 filings submitted to the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC). Lifeline funding is provided to ETCs as reimbursement for service provided to existing Lifeline subscribers (reported by ETCs monthly to USAC), and is not subject to certification by the Commission. While the Department reviewed the Lifeline-only Form 481 filings and noted no deficiencies, the Lifeline-only Form 481s are provided to the Commission on an informational basis only. The Department does not address the Lifeline only filings in its comments.

## **III. STATEMENT OF ISSUE**

- Whether each of the petitioning carriers in receipt of high cost funding provided sufficient documentation for the Commission to certify that federal universal service high-cost support received in the previous year was used, and that any federal universal service high-cost support received in the coming calendar year will be used, only for the intended purposes.

## **IV. DISCUSSION OF LAW AND POLICY**

### *FEDERAL LAW*

Section 254(e) of the Telecommunications Act states:

After the date on which Commission regulations implementing this section take effect, only an eligible telecommunications carrier designated under Section 214(e) shall be eligible to receive specific

Federal universal support. A carrier that receives such support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Any such support should be explicit and sufficient to achieve the purposes of this section (emphasis added).

47 C.F.R. §54.313 outlines the annual reporting requirements for high-cost funding recipients.<sup>11</sup>

47 C.F.R §54.314, titled “Certification of Support for Eligible Telecommunications Carriers,” provides:

- (a) Certification. States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers 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 this section.

## **V. ANALYSIS**

FCC rules require that any recipient of high cost universal service support file all information and certifications required by 47 C.F.R 54.313 by July 1 with the FCC, the Universal Service Administrative Company (USAC), and relevant state commissions. USAC has created a detailed and comprehensive form (Form 481) for this purpose, which ETCs are required to use for their annual filings. States are required to file certifications pursuant to 47 CFR §54.314 by October 1.

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<sup>11</sup> The specific reporting requirements included in 47 C.F.R 54.313 are set forth in Appendix A attached to the Departments’ comments.

*A. THE CARRIERS' SUBMISSIONS OF DATA REQUIRED BY 54.313(A)(2)-(A)(8) OF THE FCC'S RULES*

As required by 47 C.F.R. 54.313(a)(2)-(a)(4) (and Form 481), all of the petitioning carriers have provided information concerning outages, unfulfilled service requests, and complaints. Each of the carriers has provided the necessary certifications with respect to their compliance with applicable service quality and consumer protection standards, and emergency functionality [47.54.313(a)(5)-(a)(6).] All carriers filed reports of their price offerings (54.313(a)(7)) and provided statements as to their holding companies, operating companies, affiliates, and branding or "doing business as" (dba), as applicable (54.313(a)(8)).

*B. THE CARRIERS' CERTIFICATIONS WITH RESPECT TO TRIBAL ENGAGEMENT (54.313(A)(9))*

Section 54.313(a)(9) requires ETCs, to the extent that they serve tribal lands, to provide information with respect to their tribal engagement obligations. All petitioning ETCs that serve Tribal lands have reported, using FCC Form 481, the extent to which they have engaged tribal governments in their plans to deploy broadband and voice service in tribal areas.

Qwest Corporation serves three tribal entities in its service area: Lower Sioux Indian Community, Prairie Island Indian Community (also served in part by Embarq Minnesota, Inc.) and Shakopee Mdewakanton Sioux Community of Minnesota Lower Sioux Indian Community. Qwest sent each entity two letters in 2016, one in July and one in December, offering to meet to discuss:

- Lifeline expansion to Broadband
- Deployment planning
- Marketing services on Tribal lands
- Right-of-way processes, land use permitting, facilities siting, environmental and cultural preservation review process
- Tribal business and licensing requirements.

Qwest's Form 481 indicates that the tribal entities did not respond to either of the two letters. Other ETCs appear to have had some success in engaging with the tribes within their service areas. The Commission may wish to consider whether ETCs should take any action beyond what has been indicated in the Form 481 reports.

*C. RESULTS OF NETWORK PERFORMANCE TESTING [54.313(A)(11)]*

ETCs are required to file, with their FCC Form 481s, results of network performance tests this year and in future years. Each petitioning carrier has provided the network performance tests.



In addition, each petitioning ETC has reported the number, names, and addresses of community anchor institutions, if any, to which the ETC newly began providing access to broadband service in the preceding calendar year.

*Price cap carriers that receive frozen high cost support (54.313(c)(1))*

Price cap carriers that receive frozen high cost support (FHCS) must provide certification that the support the company received was used and will be used in a manner consistent with the goal of achieving universal availability of voice and broadband. The certification is made at the holding company level. Frontier, the CenturyLink companies and Windstream Corporation receive frozen high cost support, and have filed the necessary certifications.<sup>12</sup>

*Price cap carriers that receive high cost support to offset reductions in access charges (54.313(d))*

All price cap carriers that receive high cost support to offset reductions in access charges are required to certify that the support received pursuant to §54.304 in the prior calendar year was used to build and operate broadband-capable networks used to offer the provider's own retail service in areas substantially unserved by an unsubsidized competitor. Mid- Communications and Mankato are subject to this requirement and have filed the required certifications.

*Recipients of Connect America Phase I incremental and Phase II support (54.313(b) and (e))*

Recipients of Connect America Phase I incremental support and Phase II support must provide certain certifications regarding their obligations to deploy broadband beginning respectively two years and three years after acceptance of funding. Frontier, Citizens, Windstream, Mankato, Mid-Communications, and the CenturyLink companies are subject to this requirement in 2017, and have provided the necessary certifications.

*D. FINANCIAL REPORTS (54.313(F)(2))*

47 C.F.R. 54.314(f)(2) requires that privately held rate of return carriers submit a full and complete report of the company's financial condition and operations as of the previous year (2015). Recipients of loans from the Rural Utilities Service (RUS) must submit copies of their RUS Operating Report for Telecommunications Borrowers (RUS Report) as filed with the RUS. Carriers that are not recipients of loans from the RUS, and whose financial statements are audited in the ordinary course of business, must submit a copy of their *audited* financial statements. All other privately held rate of return carriers must submit either 1) copies of their

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<sup>12</sup> See <https://www.usac.org/res/documents/hc/pdf/Frozen-High-Cost%20Support-021512.pdf>

financial statements which have been subject to review by an independent certified public accountant, or 2) a financial report in a format that is comparable to the RUS report that *has not been subjected to review by an independent certified public accountant*, or a financial report in a format that is comparable to the RUS report *with the underlying information subjected to a review by an independent certified public accountant*.

All carriers subject to this requirement, filed copies of their audited or reviewed financial statements as required. Publicly traded companies are not required to file financial statements because their financial statements are available on the Securities Exchange Commission's website.

*J. CARRIERS RECEIVING SUBSIDIES EXCEEDING \$100 PER LINE PER MONTH*

In its September 20, 2016 Order Certifying ETCs' Use of Federal High-Cost Subsidy in the matter of annual certifications related to ETCs' use of Federal Universal Service Support in Docket No. P999/PR-16-8, the Commission accepted the Department's offer to investigate those carriers receiving subsidies exceeding \$100 per line per month. However, due to the significant changes in the manner in which support is provided for high cost areas, the measure of support per line has been difficult to investigate.

Companies who receive support under the ACAM model have support frozen at \$146.10 per census block *location* per month, the support is frozen for the next 10 years, and the number of access *lines* is no longer relevant. Further, because ACAM is distributed at the holding company level, per state, any attempt to gage adequacy of support per access line per operating company becomes even further distorted.

There are 10 companies filing form 481 who ostensibly receive more than \$100 per access line per month<sup>13</sup>. Six of those companies receive ACAM support shown as assigned to one of the companies of the holding company. Due to the manner of distributing funds at the holding company level there is no certainty as to how the funds shown are actually distributed. For example, East Otter Tail receives **[TRADE SECRET DATA HAS BEEN EXCISED]** in ACAM support, making it appear as if the company received over \$100 per access line per month. But, as part of Arvig Communications, there are 10 other companies, serving an additional **[TRADE SECRET DATA HAS BEEN EXCISED]** that will receive some of the distribution shown as assigned to East Otter Tail, but none of the ACAM support shows up for those companies.

Four of the 10 carriers who appear to be receiving in excess of \$100 per line per month are receiving a significant portion of their funding from the CAF-BLS fund. Emily Telephone

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<sup>13</sup> Dunnell Telephone, East Otter Tail Telephone, Emily Cooperative, Farmers Mutual, Minnesota Valley, Northern Telephone, Sacred Heart Telephone, West Central Telephone, and Woodstock Telephone.

Company and West Central Telephone Association are receiving 41% of their total high cost disbursements from the CAF-BLS fund. Farmers Mutual Telephone Company is receiving 48% of its total high cost disbursements from the CAF-BLS fund. Woodstock Telephone Company is receiving 58% of its high cost disbursements from the CAF-BLS fund. As explained in a previous section of this report, recipients of CAF-BLS support are subject to buildout obligations and budgetary controls to ensure the integrity of the support payments.

As part of the Department's review of the carriers subject to annual ETC recertification, the Department also reviewed the financial statements for the carriers. In particular, the Department reviewed the corporate expenses of each carrier and the relationship of corporate expenses to regulated revenue reported by the carriers. Seven carriers reported a corporate expense that was 50 percent or more of operating revenue (which includes high cost support received). The results can be seen in Trade Secret Attachment 1. Companies that appear to have excessive amounts of corporate expense are: Arrowhead Communications Corporation, Dunnell Telephone Company, Eagle Valley Telephone Company, Felton Telephone Company, Lismore Cooperative Telephone Company, Manchester-Hartland Telephone Company, and Rothsay Telephone Company.

*K. SUMMARY*

The Department believes that the petitioning carriers listed in Trade Secret Attachment 1 have generally provided adequate information and a sufficient level of detail as to how high cost funds have been used to fulfill the requirements implemented by the FCC.

**VI. COMMISSION OPTIONS**

- A. Certify that all of the petitioning ETCs listed in Trade Secret Attachment 1 plus the price cap companies have used Federal High Cost Universal Service Support received in 2016 and the first half of 2017, and will use Federal High Cost Universal Service Support received in the coming year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
- B. Find that some or all of the petitioning ETCs have failed to provide sufficient information to certify that the high cost support provided to the petitioning ETC(s) in 2016 and the first half of 2017, and will be used in 2018 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Deny some or all of the ETCs' petitions for certification.

- C. Certify the petitioning ETCs, but in its order certifying the petitioning ETCs, require that any company whose 2018 filing contains financial information indicating a corporate expense to network revenue ratio of 50 percent or more file sufficient detail to support the amount of corporate expense.

## **VII. RECOMMENDATION**

The Department recommends Alternative C. The Commission certify, based on the representations and certifications provided by the carriers, that the high cost support provided in 2016 and the first half of 2017 to the petitioning ETCs listed in Trade Secret Attachment 1 and the price cap companies was used, 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.







## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Public Comments**

**Docket No. P999/PR-17-08**

**Dated this 30<sup>th</sup> day of August 2017**

**/s/Sharon Ferguson**



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Elaine	Divelbliss	elaine.Divelbliss@virginmobileusa.com	Virgin Mobile USA, L.P.	10 Independence Blvd Warren, NJ 07059	Electronic Service	No	OFF_SL_17-8_17-8
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-8_17-8

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Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd  Columbus, OH 43231-5931	Electronic Service	No	OFF_SL_17-8_17-8
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	OFF_SL_17-8_17-8
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Stephen	Hegdahl	N/A	Frontier Communications of Minnesota, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Paper Service	No	OFF_SL_17-8_17-8
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-8_17-8
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_17-8_17-8
Dwayne	Johnson	jtcbusiness@means.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_17-8_17-8
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	OFF_SL_17-8_17-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	OFF_SL_17-8_17-8
Julia	Kolka	juliekolka@mabeltel.coop	Mabel Cooperative Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	OFF_SL_17-8_17-8
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	OFF_SL_17-8_17-8
Andi	Livingston	Andrea.livingston@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_17-8_17-8
Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Electronic Service	No	OFF_SL_17-8_17-8
Stephen	Meradith	Stephen.Meradith@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_17-8_17-8
Monty	Morrow	montymorrow@nu-telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	OFF_SL_17-8_17-8
Melanie	Nelson	mdnelson@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	OFF_SL_17-8_17-8
Josh	Netland	jnetland@emily.net	Emily Cooperative Telephone Company	PO Box 100 40040 State Hwy 6 Emily, MN 564470100	Electronic Service	No	OFF_SL_17-8_17-8
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	OFF_SL_17-8_17-8

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Craig	Otteness	otter@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	OFF_SL_17-8_17-8
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road  Madison, WI 53717	Electronic Service	No	OFF_SL_17-8_17-8
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive  Burnsville, MN 55306	Electronic Service	No	OFF_SL_17-8_17-8
Kris	Rademacher	krisr@farmerstel.net	Farmers Mutual Telephone Co.	301 2nd St S  Bellingham, MN 562120369	Electronic Service	No	OFF_SL_17-8_17-8
M.	Ray	cecilia.ray@lawmoss.com	Moss & Barnett	Suite 1200 150 S. 5th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-8_17-8
Julia	Redman Carter	jrccarter@readywireless.com	Boomerang Wireless LLC	955 Kacena Rd Ste A  Hiawatha, IA 52233	Electronic Service	No	OFF_SL_17-8_17-8
Carrie	Rice	carrie.rice@consolidated.com	Consolidated Communications Enterprise Services, Inc.	221 E Hickory St  Mankato, MN 56001-3610	Electronic Service	No	OFF_SL_17-8_17-8
Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25  Wawina, MN 557369721	Electronic Service	No	OFF_SL_17-8_17-8
Mark	Roach	mark.roach@ctctelcom.net	Consolidated Telephone Company	1102 Madison Street PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_17-8_17-8
Bryan	Roth	Bryan.roth@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920  Clear Lake, SD 57226	Electronic Service	No	OFF_SL_17-8_17-8

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Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_17-8_17-8
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_17-8_17-8
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 Lonsdale, MN 55046-0358	Electronic Service	No	OFF_SL_17-8_17-8
Gregory	Springer	greg.springer@ctctelcom.net	C-I Communications, Inc.	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_17-8_17-8
Kimberly	Starr	kim@kclenterprises.net	Dunnell Telephone Company	PO Box 728 Judson, Texas 75660	Electronic Service	No	OFF_SL_17-8_17-8
Cynthia	Sweet	csweet@acentek.net	Ace Telephone Association	PO Box 360 207 East Cedar Houston, MN 559430360	Electronic Service	No	OFF_SL_17-8_17-8
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	OFF_SL_17-8_17-8
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_17-8_17-8
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	OFF_SL_17-8_17-8
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-8_17-8

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Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277 Upsala, MN 56384	Electronic Service	No	OFF_SL_17-8_17-8
David	Wareikis	dwareikis@bluejaywireless.com	Blue Jay Wireless, LLC	5010 Addison Circle Addison, TX 75001	Electronic Service	No	OFF_SL_17-8_17-8
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_17-8_17-8
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_17-8_17-8
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_17-8_17-8
Lezlie	Young	lezie.p.young@windstream.com	Talk America LLC	4001 N Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_17-8_17-8
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_17-8_17-8