

Minnesota Public Utilities Commission
Staff Briefing Papers

Meeting Date: March 6, 2014 *Agenda Item # 1

Company: **All Local Exchange Carriers**

Docket No. **P999/SA-14-22**

In the Matter of the Department's Petition for Commission Approval of
Revisions to the Official Telephone Exchange Map

Issue: Should the Commission approve the Department's recommendations?

Staff: Lillian Brion..... 651-201-2216, lillian.brion@state.mn.us

Relevant Documents

PUC Order Accepting Digital Exchange Boundary Map...(13-381) June 26, 2013
DOC Comments January 31, 2014

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

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Statement of the Issue

Should the Commission approve the Department's recommendations?

Background

On November 6, 2012, the FCC's Wireline Competition Bureau established certain requirements for the collection of study area boundaries for purposes of implementing various reforms adopted as part of the Universal Service Fund/Intercarrier Compensation (USF/ICC) Transformation Order.¹ As provided under the Study Area Order and subsequent modification therein,² each independent local exchange carrier (ILEC) must certify and submit data on its study area boundary, or allow a state entity to submit and certify the data on its behalf.

On March 1, 2013, the Department of Commerce (Department), joined by the Minnesota Telecom Alliance (MTA) introduced a joint project to collaborate in assisting the incumbent local exchange carriers (ILECs) to comply with the FCC Order. The Department had maintained for about 50 years paper maps of the state's official telephone exchange boundaries. The maps were organized by county, and are approximately two feet by three feet in size. They incorporated all boundary changes that have been approved by the Commission. All Minnesota ILECs participated in the joint project. The service area boundary map project was assigned to Docket No. P999/SA-13-381.

The Department had entered into a contract with the Minnesota Geospatial Information Office (MnGeo) to create an efficient way for ILECs to review and verify the process. A designated contact from each ILEC was given access to a secure MnGeo website, where they can review the digital exchange boundaries and either agree or propose changes to their boundaries.

On May 13, 2013, the Department filed a recommendation for the Commission to accept the digital exchange boundary map which will be submitted to the FCC as Minnesota's official exchange boundary map.

On June 26, 2013, the Commission accepted the digital exchange boundary map as Minnesota's official telephone exchange boundary map, and approved the map for submission to the FCC. The Commission also directed that any disputed study area issues and proposed digital boundary changes be filed for Commission approval.³

¹ *Report and Order* released November 6, 2012, FCC's Wireline Competition Bureau (Study Area Boundary Order), DA 12-1777, in WC Docket No. 10-90 Connect America Fund, and WC Docket No. 05-337 High-Cost Universal Service Support.

² *Order on Reconsideration* released February 26, 2013, FCC's Wireline Competition Bureau, DA 13-282, in WC Docket No. 10-90 Connect America Fund, and WC Docket 05-337 High-Cost Universal Service Support.

³ *Order Accepting Digital Boundary Map as Official Telephone Exchange Boundary Map and Approving*

On June 28, 2013, MnGeo filed the telephone exchange map data with the FCC. The Department certified as to its accuracy.

On September 24, 2013, the Department entered into a new contract with MnGeo for the purpose of assisting the Minnesota ILECs in satisfying the FCC requirement to annually update the telephone exchange boundary map. The annual update is due March 15th of each year for changes made through December 31 of the previous year. For 2014, the deadline for filing the update is on March 17 since March 15th falls on a Saturday.

On January 31, 2014, the Department filed its recommendation for the Commission's acceptance of the boundary revisions forwarded by the ILECs.

Annual Update and Recertification Every Two Years of the Digital Maps

The FCC's Study Area Boundary Order also required the submission of updates by March 15 of each year, beginning in 2014, and showing any changes made by December 31 of the previous year. Also, all study boundary data must be recertified data every two years. The annual update provides states and ILECs an opportunity to notify the FCC of changes each year. The biennial recertification is intended to provide the FCC with confirmation that a state's study area boundaries remain accurate.

On January 9, 2014, the FCC extended the deadline for filing revised boundary data this year to March 17, 2014.

In Docket 13-381, this Commission decided that all disputed study area boundary issues, and that all boundary changes, whether disputed or not, should be approved by the Commission.

The digital maps are stored at a secure MnGeo website. It includes a base map approved by the Commission. It also contains a map layer containing proposed changes that were not agreed upon in the initial boundary verification conducted in the first half of 2013. Boundary lines that have not yet been agreed upon are shown in red on the map layer.

This proceeding, assigned as Docket No. P999/SA-14-22, pertains to the annual updates made to the digital maps.

For the later part of 2013, the ILECs proposed a number of updates. If the neighbor companies do not agree on the proposed change, the boundary line is marked red on the layer map.

for Submission to FCC, dated June 26, 2013, In the Matter of State Certification and Submission of Study Area Boundary Data on Behalf of Minnesota Incumbent Local Exchange Carriers and Annual Process for Updating the Data, Docket No. P999/SA-13-381.

If the neighbor companies do agree on a change to the boundary line, the initiating company changes the red line to a blue line on the map layer. The Department then changes the base map to reflect the agreed-upon boundary change. When the base map is redrawn, the previous boundary lines can no longer be shown.

DOC's Petition

The Department recommends Commission acceptance of the updates made to the telephone boundary map. The Department also request authority to upload the shape files to the FCC boundary data website no later than March 17, 2014.

The digital maps now reflect the corrected boundary lines. The Department states that there is no practical way to show the previous and the new boundaries. In response to Commission Staff's request, the Department listed the following 17 updates being recommended for Commission acceptance:

- 1) Frontier Communications of Minnesota, Inc. and Mid-Communications, Inc.
- 2) Frontier Communications of Minnesota, Inc. and Consolidated Telephone Company
- 3) Frontier Communications of Minnesota, Inc. – Intracompany boundary change
- 4) Frontier Communications of Minnesota, Inc. – Intracompany boundary change
- 5) Frontier Communications of Minnesota, Inc. and Windstream Lakedale, Inc.
- 6) Windstream Lakedale, Inc. – Intracompany boundary change
- 7) Mid-Communications, Inc. and Frontier Communications of Minnesota, Inc.
- 8) Frontier Communications of Minnesota, Inc. – Intracompany boundary change
- 9) Garden Valley Telephone Company and Twin Valley-Ulen Telephone Company
- 10) Garden Valley Telephone Company and Twin Valley-Ulen Telephone Company
- 11) Garden Valley Telephone Company and Loretel Systems, Inc.
- 12) Garden Valley Telephone Company and Loretel Systems, Inc.
- 13) Garden Valley Telephone Company and Halstad Telephone Company
- 14) Garden Valley Telephone Company and Wikstrom Telephone Company
- 15) Garden Valley Telephone Company and Wikstrom Telephone Company
- 16) Garden Valley Telephone Company and Wikstrom Telephone Company
- 17) Paul Bunyan Rural Telephone Cooperative – Intracompany boundary change

Staff Comments

Staff requested and received access to review the updates made on the maps. Although the maps cannot show the initial boundaries, it gives a general indication of the location, the affected exchanges, and the adjacent ILECs. As indicated by the Department, the changes mainly reflect the boundaries marked in the original paper maps.

The exchanges affected by the updates are identified below:

1. Frontier Communications of Minnesota, Inc. (**Janesville Exchange**) and Mid-Communications, Inc. (**Eagle Lake Exchange**)
2. Citizens Telecommunications Company of MN, LLC (**Garrison Exchange**) and Consolidated Telephone Company (**Nokay Lake Exchange**)
3. Frontier Communications of Minnesota, Inc. – Intracompany boundary change (**Wahkon and Onamia Exchanges**)
4. Frontier Communications of Minnesota, Inc. – Intracompany boundary change (**Kimberly and Malmo Exchanges**)
5. Citizens Telecommunications Company of MN, (**Clearwater**) and Windstream Lakedale, Inc. (**Maple Lake, Annandale and South Haven Exchanges**)
6. Windstream Lakedale, Inc. – Intracompany boundary change (**Maple Lake and Annandale Exchanges**)
7. Mid-Communications, Inc. (**Pemberton Exchange**) and Frontier Communications of Minnesota, Inc. (**Janesville Exchange**)
8. Frontier Communications of Minnesota, Inc. – Intracompany boundary change (**Floodwood and Warba Exchanges**)
9. Garden Valley Telephone Company (**Minerva Exchange**) and Twin Valley-Ulen Telephone Company (**Waubun Exchange**)
10. Garden Valley Telephone Company (**Fertile Exchange**) and Twin Valley-Ulen Telephone Company (Gary Exchange)
11. Garden Valley Telephone Company (**Beltrami Exchange**) and Loretel Systems, Inc. (**Ada Exchange**)
12. Garden Valley Telephone Company (**Beltrami Exchange**) and Loretel Systems, Inc. (**Ada Exchange**)
13. Garden Valley Telephone Company (**Beltrami Exchange**) and Halstad Telephone Company (**Nielsville Exchange**)
14. Garden Valley Telephone Company (**Gatzke Exchange**) and Wikstrom Telephone Company (**Holt Exchange**)
15. Garden Valley Telephone Company (**Gatzke Exchange**) and Wikstrom Telephone Company (**Middle River Exchange**)
16. Garden Valley Telephone Company (**Gatzke Exchange**) and Wikstrom Telephone Company (**Wannaska Exchange**)
17. Paul Bunyan Rural Telephone Cooperative – Intracompany boundary change (**Puposky and Turtle River Exchanges**)

Staff supports the Department recommendations.

Commission Options

1. Accept the boundary revisions agreed upon by the companies and recommended by the Department. Authorized the Department to upload all revised shape files to the FCC boundary data website no later than March 17, 2014.
2. Other action determined by the Commission.