

December 12, 2018

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

RE: **Petition of Midcontinent Communications for Designation as an Eligible Telecommunications Carrier (ETC)**
Docket No: P6186/M-18-661

Dear Mr. Wolf:

Attached are comments of the Department of Commerce concerning the Petition Midcontinent Communications (Midco) for Designation as an Eligible Telecommunications Carrier (ETC). This petition is in response to Midco's winning bid in the Connect America Fund Auction (CAF II).

The petition was filed on October 30, 2018 and supplemented on November 27, 2018 by:

Gregory Merz
Gray Plant Mooty
500 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

On behalf of:

Patrick J. Mastel
General Counsel
Midcontinent Communications
3901 N. Louise Avenue
Sioux Falls, SD 57107

The Department recommends that the Commission Approve Midco's request for ETC status if Midco demonstrates that it is providing a telecommunications service in the areas in which it is requesting the ETC status.

Sincerely,
/s/ JOY GULLIKSON
Rate Analyst

JG/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Petition of Midcontinent Communications for Designation as an Eligible Telecommunications Carrier (ETC)

Docket No: P6186/M-18-661

I. ISSUE

Whether the Minnesota Public Utilities Commission (Commission) should grant the petition of Midcontinent Communications (Midco) for high cost support ETC status in the census block for which Midco will receive Connect America Funds II (CAFII) funding.

II. PROCEDURAL HISTORY

Midco received authority to provide facilities-based local service on March 26, 2001. A history of Midco's local service and ETC filings is included in Exhibit 1. In addition to the history included in Exhibit 1, on December 10, 2018, Midco filed for a service area expansion under Docket No. P 6186/SA-18-761 and filed its associated 911 plan for the expansion under Docket No. P 6186/SA-18-760.

By public notice from the FCC on August 28, 2018, Midco was named as a winning bidder in the CAF II auction, to receive \$27,977,283.80 and serving 7410 locations in Minnesota. The CAF II award is given in monthly installments for 10 years (about \$31.46 per location per month for Midco), as long as Midco meets certain build out requirements. The 7410 locations are in the census blocks listed in the company's application for ETC for high cost fund status.

In order to receive the CAF II support, Midco, along with all other recipients, must certify to the FCC and USAC that it has received designation as an ETC eligible for high cost funding no later than February 25, 2019. The census blocks and associated exchanges for which Midco is requesting ETC status are included in the Midco supplemental filing as Midco's Exhibit 1. A map showing the location of the Midco CAF II awarded census blocks is also included in that filing and shown in these comments as Exhibit 2.

Additional requirements for CAF II support recipients include:

- Offer commercially at least one voice and one broadband service meeting the relevant service requirements to the required number of locations in the following timeframe:
 - 40% of the required number of locations in a state by the end of third year of support
 - An additional 20% in each subsequent year
 - 100% by the end of the sixth year of support
 - The exact deployment schedule is determined by the carriers themselves, not the FCC.
- File with USAC annual reports and build-out milestone certifications, as well as data on the locations where service is available. Failure to meet the terms and conditions of support can result in increased reporting obligations and possible withholding and/or recovery of support.
- Offer at least one broadband and voice service at rates that are reasonably comparable to the rates for similar service in urban areas. The FCC uses its annual Urban Rate Survey to determine the range of rates that are reasonably comparable¹.

The FCC named fifteen companies as CAF II winners for Minnesota locations. They are:

¹ From <https://www.fcc.gov/auction/903>.

Company	Amount (\$)	Locations	Amount (\$) /Location	Amount (\$) /Location/10 years/month
Broadband Corporation	\$428,117	128	\$3,344.66	\$27.87
Consolidated Telephone	\$934,933.80	358	\$2,611.55	\$21.76
Farmers Mutual	\$348,991.60	163	42,141.05	\$17.84
Federated Coop	\$1,431,038.80	808	\$1,771.09	\$14.76
Garden Valley	\$880,346	95	\$9,266.80	\$77.22
Halstad Telephone	\$19,635.20	7	\$2,805.03	\$23.38
Interstate Telephone	\$552,329.60	209	\$2,642.73	\$22.02
Jaguar	\$510,587.60	672	\$759.80	\$6.33
Johnson Telephone	\$81,272.50	47	\$1,729.20	\$14.41
LTD Broadband	\$1,104,440.80	840	\$1,314.81	\$10.96
Midcontinent	\$27,977,283.80	7410	\$3,775.61	\$31.46
Paul Bunyan	\$1,313,542.60	315	\$4,169.98	\$34.75
Roseau Electric	\$2,081,769.70	326	\$6,385.80	\$53.22
West Central Telephone	\$611,934.40	532	\$1,150.25	\$9.59
Wikstrom	\$532,556.80	56	\$9,509.94	\$79.25
TOTALS	38,808,780.20	11,966	53,378.30	
<i>AVERAGES</i>	<i>2,587,252.01</i>	<i>798</i>	<i>3,558.55</i>	29.65

III. LEGAL STANDARDS

The Code of Federal Regulations Part 54 governs the federal requirements for common carriers becoming ETCs. Federal Communications Commission (FCC) orders have adjusted some of these regulations over the years. Most of the adjustments have been to reduce reporting requirements. Parts relevant to this petition include:

§ 54.101 (b) requires “an eligible telecommunications carrier must offer voice telephony as set forth in paragraph (a) of this section in order to receive federal universal service support.” Part (a) requires voice grade access to the public switched network or its functional equivalent must be provided.

§ 54.201 states in parts (d), (e), and (h): “A common carrier designated as an ETC under this section shall be eligible to receive universal service support in accordance with section 254 of the Act

and shall, throughout the service area for which the designation is received:

- (1) Offer the services that are supported by federal universal service support mechanisms under subpart B of this part and section 254(c) of the Act, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
- (2) Advertise the availability of such services and the charges therefore using media of general distribution.

(e) For the purposes of this section, the term facilities means any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part.

(f) For the purposes of this section, the term "own facilities" includes, but is not limited to, facilities obtained as unbundled network elements pursuant to part 51 of this chapter, provided that such facilities meet the definition of the term "facilities" under this subpart.

(h) A state commission shall not designate a common carrier as an eligible telecommunications carrier for purposes of receiving support only under subpart E [Lifeline] of this part unless the carrier seeking such designation has demonstrated that it is financially and technically capable of providing the supported Lifeline service in compliance with subpart E of this part

§ 54.203 states in part: "If no common carrier will provide the services that are supported by federal universal service support mechanisms under section 254(c) of the Act and subpart B of this part to an unserved community or any portion thereof that requests such service, the Commission, with respect to interstate services, or a state commission, with respect to intrastate services, shall determine which common carrier or carriers are best able to provide such service to the requesting unserved community or portion thereof and shall order such carrier or carriers to provide such service for that unserved community or portion thereof."

Minnesota Rules 7811.1400 and 7812.1400, subp. 13 state: “The commission may order an LSP to provide the services that are supported by a federal universal service support mechanism to an otherwise unserved area only as provided in section 102(a) of the act and consistent with Minnesota Statutes, sections 237.081 and 237.16.”

Minn. Rule 7812.0600 subp. 4 and 7811.0600, subp.4 state Subp. 4. An LSP designated an ETC by the commission must provide local service, including, if necessary, facilities-based service, to all requesting customers within the carrier's service area on a nondiscriminatory basis, regardless of a customer's proximity to the carrier's facilities. An LSP may assess special construction charges approved by the commission if existing facilities are not available to serve the customer.

Also, in Docket P999/M-05-1169, *Order Adopting FCC Requirements for Designating Eligible Telecommunications Carriers, As Modified*, the Commission ordered:

“After the date of this Order, petitioners to the Commission to be designated an eligible telecommunications carrier under 47 U.S.C. 214(e)(2) must

- (1) (A) Commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. Each applicant shall certify that it (1) provide service on a timely basis to requesting customers within the applicant’s service area where the applicant’s network already passes the potential customer’s premises; and (2) provide service within a reasonable period of time, if the potential customer is with the applicant’s licensed service are[a] but outside its existing network coverage, if service can be provided at reasonable cost by (a) modifying or replacing the requesting customer’s equipment; (b) deploying a roof-mounted antenna or other equipment; (c) adjusting the nearest cell tower; (d) adjusting network or customer facilities; € reselling services from another carrier’s facilitates to provide service; or (f) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment”

In setting the requirements for this round of auction to receive the CAF II funding, the FCC required:

“Each Connect America Fund support recipient must offer voice as a standalone service, but may separately bundle its broadband

offerings with a voice service.”² USF/ICC Transformation Order, 26
FCC Rcd at 17693, para. 80.

Congress, in 47 USC § 214 (e), requires as a precondition to assessing FCC high cost or Lifeline support subsidies, that providers be designated Eligible Telecommunication Carriers by a state commission. Telecommunications carriers are defined by 47 USC § 153 (51) as “any provider of telecommunications services [and a] telecommunications carrier shall be treated as a common carrier . . . only to the extent that it is engaged in telecommunications services.”

The regulatory status of VOIP service has recently been in litigation. The Minnesota Commission found that fixed³ VOIP services are subject to applicable consumer protections for telecommunications service under Minnesota statutes, as there has been no federal preemption of the Commission’s authority.⁴ Although the FCC has not classified fixed or over-the-top VoIP as being either an information service or a telecommunications service, in a 2-1 split decision, the Eighth Circuit Court of Appeals found that all VoIP service is an information service.⁵ The Minnesota Commission’s request for an en banc rehearing of the Eighth Circuit decision was recently denied. In the absence of any action that would stay the Eighth Circuit’s decision, it is the Department’s understanding that VOIP services are information services in those states that are part of the Eighth Circuit. Thus, in the Eighth Circuit, companies may not use their VoIP service offering to satisfy the above stated requirement that an ETC must be a provider of telecommunications services.

IV. ANALYSIS

Midco has received Lifeline only ETC status in its CLEC exchanges under various dockets, as listed in Exhibit 1. Midco now requests ETC for high cost support in the census blocks for which it will receive CAF II funds. A representation of the census blocks where Midco was the winner in the reverse auction is shown in Exhibit 2. Those census blocks and the associated exchanges in which the census blocks are located are listed in the company’s supplemental filing.

The Commission found Midco's previous petitions for ETC status in various areas to be appropriate to grant ETC status for Lifeline only. Similar analysis applies to the high cost ETC status. Of particular note:

² USF/ICC Transformation Order, 26 FCC Rcd at 17693, para. 80.

³ The term “fixed” represents those services at a stationary location, as opposed to “over-the-top” or “bring your own broadband” VoIP services that may be used from any location that the customer has access to the internet. Over-the-top VoIP is also referred to as “nomadic VoIP.”

⁴ See *In the Matter of the Complaint of the Minnesota Department of Commerce Against the Charter Affiliates Regarding Transfer of Customers*, Order Finding Jurisdiction and Requiring Compliance Filing, Docket No. P6716,5615/C-14-383. July 28, 2015.

⁵ *Opinion*, 2018 WL 4260322 (8th Cir September 7, 2018)

1. Facilities and Commitment to Serve - Midco stated that it will provide broadband and voice telephone over its fiber-optic facilities. Midco certifies that it will:
 - (a) provide service on a timely basis to requesting customers within the service area where Midco's network already passes the potential customer's premises; and
 - (b) provide service within a reasonable period of time, if the potential customer is within the service area but not passed by Midco's current network facilities, if service can be provided at reasonable cost by constructing network facilities.
2. Midco's Basic Universal Service Offering - Midco agreed to provide voice telephony in the Service Area at rates that are reasonably comparable to the rates for similar service in urban areas. The services Midco offers meet the Basic Local Service requirements under Minn. Rule 7812.0600 and under 47 CFR § 54.101(a). The basic rate for Midco's stand alone phone service is \$20.00 per month.
3. Midco's Advertising Plan - Midco stated that it currently meets and will meet the advertising requirements through several different channels of general distribution, including newspaper and direct mail. Midco plans to advertise the availability of its Lifeline universal service offering throughout the Service Area through the same advertising channels it currently employs. In addition, the availability of the offering throughout the service area will be listed continuously on Midco's web site: www.Midco.com. The service offering will also be published at least annually in the local newspaper, and will be posted at the Midco office in Minneapolis, MN.
4. Midco's Ability to Remain Functional in Emergency Situations - Midco stated that its network can and will remain functional in emergencies. The central office serving Midco's customers is equipped with battery power supply and electrical generators to provide service in the event of a commercial power outage. The interoffice facilities serving the service area are on a diverse routed fiber optic ring, which if cut will be automatically rerouted. Midco complies with the Commission's Rules in Chapter 7810 establishing minimum standards on various operational matters, such as 7810.3900 (Emergency Operations); 7810.4900 (Adequacy of Service); and 7810.5300 (Dial Service Requirements).
5. Midco's Satisfaction of Consumer Protection and Service Quality Standards – Midco is subject to, and complies with, the Commission's Rules pertaining to service quality and consumer protection. Midco's tariff has specific provisions outlining the following terms addressing consumer protection issues:
 - Deposit and guarantee requirements
 - Customer billing
 - Appropriate handling of customer complaints and billing disputes
 - Disconnection and notice requirements

6. Requirement to provide telecommunications services. Congress, in 47 U.S.C. § 214 (e), required as a precondition to accessing FCC high cost or consumer specific “lifeline” support subsidies, that providers be designated ETCs by a State commission.⁶ As explained by the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Utility Consumer Advocates (NASUCA) in their September 28, 2108 Amicus Brief to the United States Court of Appeals for the Eighth Circuit: “State commissions across the country have certified numerous ETCs based on their provision of I-VoIP as a telecommunications service. Neither the FCC nor any State Commission can ignore the Congressional restrictions and certify carriers that only provide information services.”⁷ To do otherwise would be defrauding the USF fund. Thus, in order to be granted ETC status, Midco must offer a telecommunications service. The ETC petitions filed as a result of the CAF II auction, including the petition by Midco, are likely to use IP technology for the voice service offering.

As stated earlier, the Eighth Circuit Court of Appeals found that all VoIP service is an information service.⁸ The Minnesota Commission’s request for an en banc rehearing of the Eighth Circuit decision was recently denied. In the absence of any action that would stay the Eighth Circuit’s decision, it is the Department’s understanding that VOIP services are information services, in those states that are part of the Eighth Circuit. Thus, in the Eighth Circuit, companies may not use their VoIP service offering to satisfy the above stated requirement that an ETC must be a provider of telecommunications services.

In summary, Midco has been operating successfully for several years as a CLEC and many more years as an incumbent. This history comports with the requirement of 47 CFR § 54.201 (h) that the carrier demonstrate it is financially and technically capable of providing the supported services. However, due to the recent 8th Circuit Decision, Midco must demonstrate that it is offering a telecommunications service in the areas in which it is requesting ETC status.

V. COMMISSION OPTIONS

The Commission may choose to:

⁶ “Telecommunications carriers” are defined as “any provider of telecommunications services [and a] telecommunications carrier shall be treated as a common carrier under this chapter only to the extent that it is engaged in providing telecommunications services.” 47 U.S.C. § 153 (51). (emphasis added). The federal universal service fund program is “under this chapter” in 47 U.S.C. § 254 (51).

⁷ See Motion Seeking Leave to File Brief of Amici Curiae The National Association of Regulatory Utility Commissioners and The National Association of State Consumer Advocates Supporting Defendant-Appellants Petition for Rehearing En Banc, Appeal from the U.S. District Court for the District of Minnesota, No.15-cv-3925, at page 5.

⁸ *Opinion, 2018 WL 4260322* (8th Cir September 7, 2018)

- A. Approve Midco's request for ETC status for high cost support in the census blocks listed in its filing.
- B. Approve Midco's request for ETC status if Midco demonstrates that it is providing a telecommunications service in the areas in which it is requesting the ETC status.
- C. Deny Midco's request for ETC status for high cost support in the census blocks listed in its filing.
- D. Take other action, as the Commission deems appropriate.

VI. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission order option B: Approve Midco's request for ETC status if Midco demonstrates that it is providing a telecommunications service in the areas in which it is requesting the ETC status.

/ja

On March 26, 2007, Midco was certified by Commission Order in Docket No. P6186/NA-07-160, to provide facilities-based local service in the CenturyLink exchanges of Sabin, Breckenridge, Ortonville, East Grand Forks, and Crookston.

On November 4, 2008, the Commission approved Midco's request, in Docket No. P6186/M-08-1202, to allow the Company to provide facilities based and resold service in the communities of Fairmont and Sherburne, where Frontier Communications of Minnesota, Inc. is the incumbent local exchange carrier

On November 17, 2008, in Docket No. P6186/M-08-1274, the Commission approved Midco's request to allow the Company to provide facilities based and resold service in the communities of Moorhead, Dilworth, and Bemidji, where CenturyLink is the incumbent local exchange carrier.

On December 15, 2008, in Docket No. P6186/M-08-1360, the Commission approved Midco's request to allow the Company to provide facilities based and resold service in the Citizens Telecommunications and CenturyLink communities of Ranier and Cass Lake.

On August 10, 2011, in Docket P6186/M-11-666, the Commission approved Midco's request to allow the Company to provide facilities based and resold service in the community of Bemidji, in the Puposky exchange where Paul Bunyan is the incumbent local exchange carrier.

On September 9, 2011, in Docket P6186/M-11-714, the Commission approved Midco's request to allow the Company to provide facilities based and resold service in the following communities:

- A. Where Qwest is the incumbent carrier: Rush City, Pine City, Isanti, Mora, Princeton, Cambridge, Ogilvie, Harris, Nessel Township, Pokegama, Pine City Township, Bradford, Forest Lake, May Township in Washington County, Columbus Township, , East Bethel, Bethel, St. Francis, the Castle Tower Mobile Home Park in East Bethel, Baldwin Township, Stanford Township, Braham, North Branch, Wabasha, Avon, Cold Spring, Foley, Holdingford, St. Joseph, St. Stephen, St. Augusta, St. Wendel, Haven Township, Rockville, Avon Township, Reads Landing.
- B. Where Citizens Telecommunications Company of Minnesota is the incumbent carrier: Wyoming, Marine on the St. Croix, Linwood, Lent, Stacy, Shafer, Taylors Falls, Chisago City, Lindstrom, Scandia, Center City, Milaca, Clear Lake, Clear Lake Township, Clearwater, Palmer.
- C. Where Embarq Minnesota is the Incumbent carrier: Plainview/Elgin.
- D. Where CenturyTel of Minnesota is the Incumbent carrier: Sand Prairie/Greenfield Township, Kellogg, and Pierz.
- E. Where Windstream Lakedale Telephone Company is the incumbent carrier: Zimmerman, Bluehill Township, Livonia Township, Zimmerman Terrace Mobile Home Park in Zimmerman, Becker.
- F. Where Benton Cooperative Telephone Company is the incumbent carrier: Foreston.

G. Where Melrose Telephone Company is the incumbent carrier: Richmond

On October 28, 2011, in Docket P6186/M-11-399, the Commission granted ETC status to Midco in the following CenturyLink exchanges: Avon, Bemidji, Braham, Breckenridge, Cambridge, Cass Lake, Crookston, East Grand Forks, Forest Lake, Isanti, Moorhead, Mora, North Branch, Ogilvie, Ortonville, Pine City, Princeton, Rush City, Sabin, and Wabasha.

On September 11, 2012, in Docket P6186/M-12-900, the Commission authorized an expansion of Midco's certificate of authority to include the City of Randolph, Randolph Township, and Stanton, where Citizens Telecommunications is the incumbent local service provider and the City of Vermillion, City of Hampton, City of Coates, Nininger Township, Vermillion Township, Ravenna Township, and Marshan Township, where Embarq (CenturyLink) is the incumbent local service provider.

On July 16, 2103, in Docket P6186/SA-13-520, the Commission authorized an expansion of Midco's certificate of authority to include the City of Medford and Waseca, where CenturyLink is the incumbent local service prover and the exchanges of LeCenter, Waterville, and Elysian, where Frontier Communications is the incumbent local service provider.

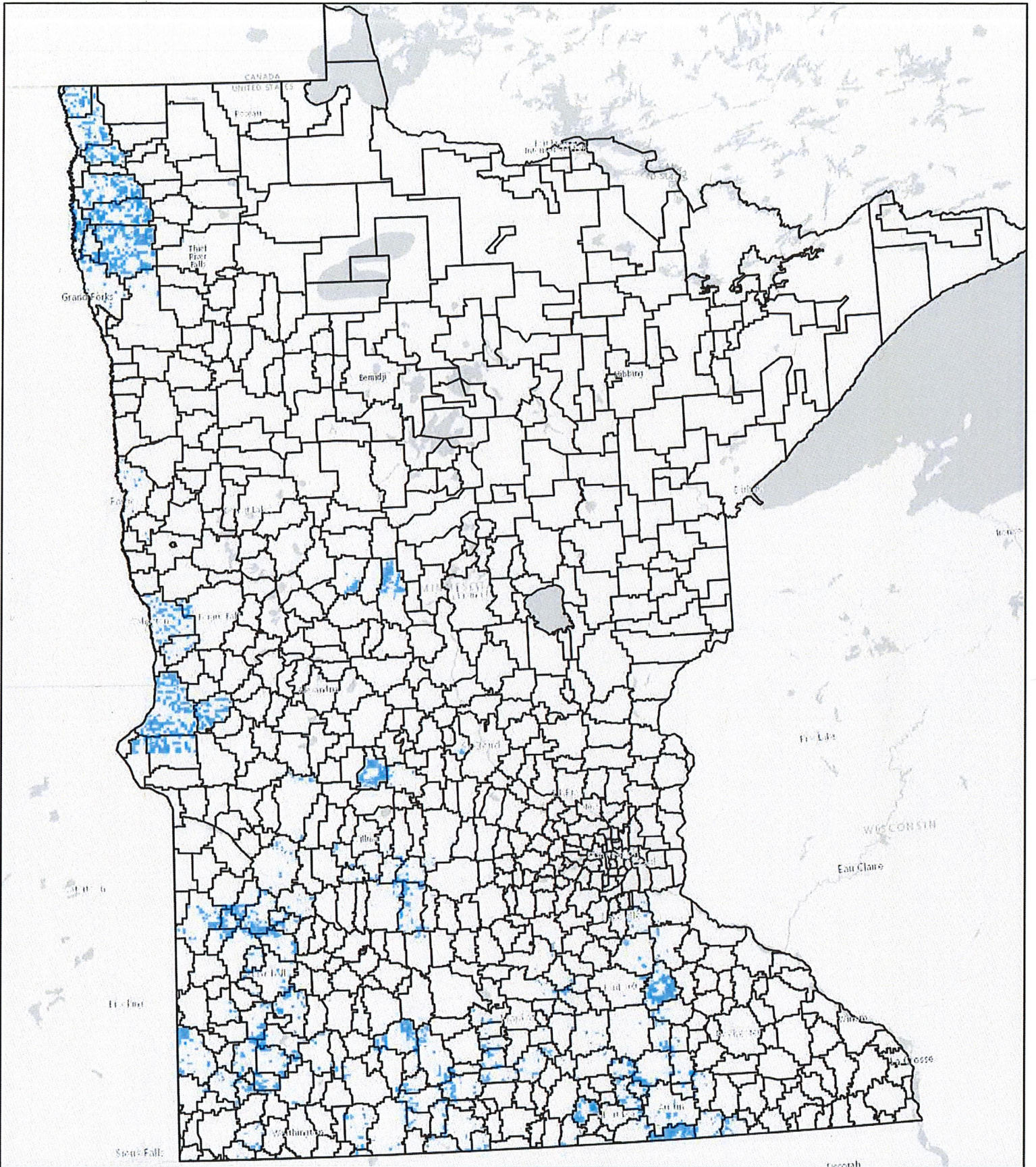
On September 12, 2013, in Docket P6186/SA-13-731, the Commission authorized an expansion of Midco's certificate of authority to include the City of Ellendale where Citizens Telecommunications is the incumbent local service provider.

On August 18, 2015, in Docket P6186/SA-15-528, the Commission authorized an expansion of Midco's certificate of authority to include the exchanges of Alden, Claremont, Clarks Grove, Geneva, Glenville, and New Richland, where Citizens Telecommunications, Embarq (CenturyLink) and CenturyLink are the incumbent local service providers.

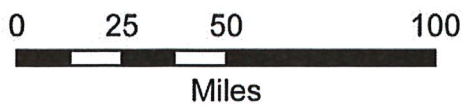
On January 8, 2016, in Docket P6186/SA-15-1068, the Commission authorize an expansion of Midco's certificate of authority to include the city of Annandale, including portions of Corinna Township and Southside Township, where Windstream Lakedale is the incumbent local service provider.

On April 5, 2016, under Docket P6186/M-16-39, the Commission granted ETC status for Lifeline support to all the above areas that Midco serves where ETC has not already been granted.

On May 15, 2017, under Docket P6186/M-17-230, the Commission authorized an expansion of Midco's certificate of authority to include portions of Little Fork, Canby, Taunton, Ghent, and Porter, as well as to extend ETC status.



-  MN Exchange Areas
-  CAF Blocks Awarded to Midco



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
Comments**

Docket No. P6186/M-18-661

Dated this 13th day of December 2018

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tracy	Bandemer	Tracy.Bandemer@itctel.com	Interstate Telecommunications Cooperative, Inc..	312 4th St W PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_18-661_M-18-661
Lynda	Bauer	lyndabauer@nu-telecom.net	Western Telephone Co.	27 N Minnesota Street New Ulm, MN 56073	Electronic Service	No	OFF_SL_18-661_M-18-661
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_18-661_M-18-661
Mark	Birkholz	N/A	Home Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	OFF_SL_18-661_M-18-661
Todd	Boyd	todobo@itctel.com	Interstate Telecommunications, Inc.	PO Box 200 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_18-661_M-18-661
Chad	Bullock	chadb@wcta.net	West Central Telephone Association	308 Frontage Road PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_18-661_M-18-661
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	OFF_SL_18-661_M-18-661
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_18-661_M-18-661
Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	OFF_SL_18-661_M-18-661
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-661_M-18-661

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Regulatory	Contact	wci.regulatory@windstream.com	Windstream Communications, Inc.	600 Willowbrook Office Park Fairport, NY 14450	Electronic Service	No	OFF_SL_18-661_M-18-661
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_18-661_M-18-661
Lee	Elliott	W.Lee.Elliott@windstream.com	Windstream Communications, Inc.	4001 N Rodney Parham Rd Little Rock, AR 72212	Paper Service	No	OFF_SL_18-661_M-18-661
Travis	Floyd	travisf@wcta.net	West Central Telephone Assoc	308 Frontage Rd PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_18-661_M-18-661
Kenneth	Gibson	kenneth.gibson@windstream.com	Windstream Communications, LLC	4001 Rodney Parham Road Little Rock, Arkansas 72212	Paper Service	No	OFF_SL_18-661_M-18-661
Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Assoc	PO Box 304 308 Frontage Rd Sebeka, MN 56477	Electronic Service	No	OFF_SL_18-661_M-18-661
Robert L.	Hammond Jr.	hammondjr@bevcomm.net	Blue Earth Valley Telephone Company	123 W 7th St Blue Earth, MN 56013-1309	Electronic Service	No	OFF_SL_18-661_M-18-661
Timothy	Loken	Tim.P.Loken@windstream.com	Windstream Communications, Inc.	4001 N Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_18-661_M-18-661
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_18-661_M-18-661

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick J	Mastel	pat_mastel@mimi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_18-661_M-18-661
Stephen	Meradith	Stephen.Meradith@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_18-661_M-18-661
Gregory R.	Merz	gregory.merz@gpmlaw.com	Gray, Plant, Mooty	80 S 8th St Ste 500 Minneapolis, MN 55402-5383	Electronic Service	No	OFF_SL_18-661_M-18-661
Todd	Morris	toddm@itctel.com	Interstate Telecommunications Coop	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_18-661_M-18-661
Ann	Morrison	ann.morrison@consolidated.com	Consolidated Communications	5 Davis Farm Rd Portland, ME 04106	Electronic Service	No	OFF_SL_18-661_M-18-661
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_18-661_M-18-661
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_18-661_M-18-661
Bryan	Roth	Bryan.roth@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_18-661_M-18-661
Geri	Salmela	geris@wcta.net	West Central Telephone	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	OFF_SL_18-661_M-18-661
Julie	Serbus	jserbus@mval.net	Minnesota Valley Telephone Company	PO Box 310 340 2nd Ave E Franklin, MN 55333	Electronic Service	No	OFF_SL_18-661_M-18-661

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Severson	bademailseverson@itctel.com	Interstate Telecommunications Coop, Inc.	312 Fourth Street West Clear Lake, SD 57276	Paper Service	No	OFF_SL_18-661_M-18-661
John	Sonnek	jsonnek@bevcomm.com	Blue Earth Valley Telephone Company dba BEVCOMM	123 West 7th St Blue Earth, MN 56013	Electronic Service	No	OFF_SL_18-661_M-18-661
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-661_M-18-661
Hung	Tran	hung.v.tran@windstream.com	Windstream Communications	4001 Rodney Parham Rd. Little Rock, AR 72212	Electronic Service	No	OFF_SL_18-661_M-18-661
Amy	Vick	amyb@itctel.com	Interstate Telecommunications Coop.,	312 4th St. W. PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_18-661_M-18-661
Kathy	Weitala	kathy.weitala@itctel.com	Interstate Telecommunications Cooperative, Inc..	312 4th Street West Clear Lake, South Dakota 57226	Electronic Service	No	OFF_SL_18-661_M-18-661
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-661_M-18-661
Cliff	Woodbury	cliffwoodbury@nu-telcom.net	Western Telephone Company	400 Second Street North New Ulm, MN 560730697	Electronic Service	No	OFF_SL_18-661_M-18-661