

April 19<sup>th</sup>, 2021

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place, Suite 350  
St. Paul, MN 55101-2147

Re: In the Matter of the Minnesota Public Utilities Information Request sent to all Rural  
Digital Opportunity Fund (RDOF) Grant Winners

Dear Mr. Seuffert:

Attached please find Halstad Telephone Company's response to the Minnesota Public Utilities  
Commission information request filed in Docket No. P530/AM-21-83.

Please contact the undersigned if further information is needed at 651-621-8306.

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley  
Consultant Halstad Telephone Company

**Additional Information Requested from ETC Petitioners**

ETC Applicant Name: Halstad Telephone Company		
MPUC Docket Number: P530/AM-21-83		
	Yes (Certify)/ No	Additional Information (Attach additional pages as necessary)
1. Please certify the applicant's commitment to meeting the service and performance quality requirements applicable to its support type. See 47 C.F.R. § 54.202(a)(1).	YES	Halstad certifies that it will comply with service requirements applicable to the support that it receives.
2. Will the applicant offer standalone voice telephony service? See 47 CFR 54.101(b). Applicants holding an ETC designation in MN should describe, in sufficient detail to understand the offering, their existing voice telephony service offered to customers, including tariff sheets and contracts, proof of making offerings for this service to consumers in their existing census blocks covered by their present ETC designation, and the number of customers using the applicant's offered voice telephony service in both total numbers and as a percent of customers served in the state. Indicate whether the offering for the RDOF census blocks covered by this application will be the same standalone service and if not, describe how it will differ. See 47 CFR 54.101 (b).	YES.	Please see the Halstad's RDOF ETC application, specifically Exhibit 2 page 12. This page is a copy of the current Halstad's MN Intrastate Tariff and it lists the standalone residential local service rate of \$18.00 and a business local service rate of \$19.50.  As of February 2021, Halstad had a total of 1,719 voice customers. This number of voice customers represents 65% of its total customers.  Customers in the RDOF Area will be offered the same standard rate for voice services from its' Tariff.

<p>3. If so, will the applicant do so through its own facilities, meaning "any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support" or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier)? See 47 CFR 54.201(d)(l).</p>	<p>YES</p>	<p>Halstad will offer services using its own facilities.</p>
<p>4. For the voice telephony service, identify the customer point of contact (name, address, contact information), and confirm this contact person is legally authorized to represent the applicant in communications with customers.</p>	<p>YES</p>	<p>Mark Forseth, CEO/General Manager, 345 2<sup>nd</sup> Avenue West, PO Box 55, Halstad, MN 56548, Phone number 218-456-2125. Email: mark.forseth@rrv.net</p>
<p>5. Does the voice telephony service have "access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems"? See 47 CFR § 54.101 (a).</p>	<p>YES</p>	<p>Halstad's voice service includes access to E911 dialing.</p>
<p>6. Please describe how the applicant will remain functional in emergency situations, namely, what is "its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations." 47 CFR § 54.202(a)(2)?</p>	<p>Yes</p>	<p>See Attachment 1.</p>
<p>7. Please describe the extent to which the offered voice telephony services will be offered at "rates that are equal or lower to the Commission's reasonable comparability benchmarks for fixed wireline services offered in urban areas." 47 CFR 54.804(b)(2)(iii).</p>	<p>YES</p>	<p>The local exchange rates offered by Halstad are in the range of the announced FCC 2021 Annual Urban Rate Survey Rates.  The 2021 Annual urban rate survey for an unlimited or flat rate local service average rate is \$33.73. The reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$54.75</p>
<p>8. Will the applicant satisfy additional requirements applicable to all high-cost ETCs, such as Lifeline obligations 47 CFR § 54.405</p>	<p>YES</p>	<p>Halstad will make available Lifeline Service all qualifying customers.</p>

<p>9. If so, will the applicant commit to e-file documentation evidencing the offering of Lifeline service in the required census blocks as required by 47 CFR § 54.405(b).</p> <p>a. Current Lifeline providers should provide evidence of prior and current communications, including advertisements and website communications as described in 47 CFR § 54.405(c) for census blocks for which it currently receives support and the number of Lifeline customers being served.</p> <p>b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c).</p>	<p>YES</p>	<p>Halstad provided samples of its existing Lifeline advertising in MN PUC Docket No. 20-747. That response is attached to this response. Halstad advertises lifeline on its website, annually in a bill message to all customers, in its customer newsletter and via posters in the Halstad Office concerning Lifeline services.</p>
<p>10. If the answer to question 3 above is through an affiliate or by offering a managed voice solution (including VoIP) through resale of another carrier's services, identify the other carrier, describe the legal relationship between the applicant and the other carrier, and describe how the other carrier will comply with the requirements listed above.</p>	<p>NA</p>	<p>NA</p>
<p>11. Will the applicant commit to notifying the Minnesota Public Utilities Commission, Minnesota Department of Commerce and the Minnesota Office of the Attorney General if it has failed to meet its milestones for the identified census blocks under the FCC ROOF grant obligations? 47 CFR 54.320(d).</p>	<p>YES</p>	<p>Halstad will notify the Minnesota Public Utilities Commission, The Minnesota Department of Public Safety, USAC and the FCC within 10 business days after the applicable deadline if it has failed to meet a build out milestone.</p>

Attachment 1 Response to Section 6 of the MN PUC Information Request  
From Halstad's 481 Filing in 2020

SAC: 361401

State: MN

Halstad Telephone Company

Form 481 Line No. 610 Description of Functionality in Emergency Situations

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Halstad Telephone Company has:

- Established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide:
  - A minimum of four hours of battery service in each central office.
  - A permanently installed power unit in exchanges exceeding 5000 lines.
  - Mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.
  
- Has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.

October 27, 2020

Mr. Will Seufert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

Re: Response to Minnesota Public utilities Commission Request for Information in Docket No. 20-747

Dear Mr. Will Seuffert:

Enclosed please find the Initial Comments for Halstad Telephone Company as a ETC in Docket No. P999/CI-20-747.

Please call me at 651-621-8306 with any questions.

Sincerely,

*/s/ Mary T. Buley*

Mary T. Buley  
Telecommunications Consultant

Enclosure

cc: Mark Forseth, Halstad Telephone Company  
Pauline Hinkley, Halstad Telephone Company

Initial Comments for Halstad Telephone Company (“Halstad”) as a ETC in Minnesota:  
In Minnesota PUC Docket No. 20-747

1. Current number of Lifeline Customers as of 9/30/20
  - a. Study Area Code: (361401) 17 lifeline customers

2. How are Lifeline Services Advertised:

Halstad advertises Lifeline on its website at:  
<https://www.halstadtel.com/telephone/>

In addition, Halstad advertises lifeline as a bill message, in the company’s newsletter to customers and has posters concerning Lifeline in its Halstad business office.

3. Provide Samples of Lifeline Advertising: Attached are examples of lifeline advertising used by Halstad on its’ web site, the lifeline article that appeared in Halstad’s customer newsletter 2020 Summer edition, and the lifeline bill message that appeared in January 2020. Attached are USAC’s “Lifeline how to Apply” pdf and “ Manage your Benefit” pdf that Halstad has posted in all of its offices.
4. Halstad recommends that county social services departments in Minnesota should be informed on how a client can apply for benefits through the National Verifier consumer portal and let them know that lifeline discounts are available to assist in paying for voice or broadband services.



\$18.00/mo

Internet

Television \$19.50/mo

Mobile

Business

CONTACT US

All residential customers across the HTC service area

All business customers across the HTC service area

Available Phone Features

Other Monthly Charges

SHOP FOR SERVICES

Low Income?

You may qualify to save on your internet or phone service.

LEARN MORE

My Account

eBill Login

Webmail

Support

Support Home

Frequently Asked Questions

Products & Services

Mobile

Television

About Us

About HTC

How Your Cooperative Works







## Life Line Support For Low Income Customers

### Help With Your Bill

You may be eligible for assistance in paying your telephone bill if you receive benefits from certain low-income assistance programs. For more information or **an application form**, contact Halstad Telephone Company or the **Minnesota Department of Commerce**.

### There are Two Programs

**Minnesota's Telephone Assistance Plan (TAP)** offers a monthly credit of \$7.00 on your landline telephone service plan. You may receive the TAP credit on one landline per household.

The **Federal Lifeline Program** offers a monthly discount of \$9.25 on some landline telephone service plans. Lifeline also offers discounts on some wireless telephone service plans and some broadband internet service plans (that's NEW). You may receive the Lifeline discount on one service per household. The definition of a "household" is anyone living at an address including children, relatives, people not related to you, etc. who share income(s) and household expenses.

### Qualifications

The telephone or broadband service must be in your name. You must show proof that you or a member of your household participates in at least one of the following programs or is income eligible:

- Federal Public Housing Assistance
- Food Support/Supplemental Nutrition Assistance Program (SNAP)
- Medicaid/Medical Assistance

- Support Home
- Troubleshooting
- Instructions: TV Remotes & Call Features
- Call 811 Before You Dig
- Customer Privacy And Rights
- Life Line Support**
- eBill Signup
- Do Not Call Registry
- Contact Us



- Supplemental Security Income (SSI)
- Veterans Pension or Survivors Pension Benefit
- Bureau of Indian Affairs General Assistance and living on Tribal lands
- Tribal Programs (and live on federally-recognized Tribal lands)
- Food Distribution Program on Indian Reservations (FDPIR) and living on Tribal lands
- Tribally Administered Temporary Assistance for Needy Families (TTANF) and Living on Tribal lands

If you do not participate in any of the programs listed, you may qualify if your income is at or below 135% of the 2018 Federal Poverty Income Guidelines:

Household Size | Income

One	\$16,862
Two	\$22,829
Three	\$28,796
Four	\$34,763
Five	\$40,730
Six	\$46,697
Seven	\$52,664
Eight	\$58,631

For each additional person, add \$5,967

(The federal poverty guidelines are typically updated at the end of January)

### Important Information on How to Apply

Contact Halstad Telephone or download an **application at the Department of Commerce**. One application may be used to apply for both TAP and Lifeline. Return the application and proof of eligibility to us. It can take up to two months for discounts to appear on your bill. You must pay the phone bill until that time. Discounts cannot be applied to past due bills.

The Minnesota Public Utilities Commission (MPUC) regulates the TAP/Lifeline programs. If you have questions regarding these programs, contact the MPUC at 651.296.0406 or 1.800.657.3782.



### Save money with eBill from HTC

Did you know that eBills from HTC save money? Save us the paper and postage cost of paper bills by signing up for eBilling. Go to <https://ebill.halstadtel.com> and click the [Create a new login](#) link to create your online account. All you need is your **invoice number** and your **invoice total** from your last paper bill. Follow the directions, fill in the blanks, and you will be ready to go!

You will receive a confirmation email with a link to click to confirm your web account.

Note: you must add elationbilling@rrv.net to your list of safe senders or add it to your address book to ensure delivery of email notifications.

Once you confirm your account, login to your account at <http://ebill.halstadtel.com>. On the menu on the left side of the home page, click Manage Account. On the next screen, click Invoice Preference. On the next screen, click Web bill only and then click the Change Preference button. You will receive a confirmation email telling you that your invoice choice has been changed.

When you choose to receive a web invoice, you will receive an email notification when your bill is ready each month at the email address you provide.

If you need assistance with signing up for your web account, just give us a call. And remember, saving HTC money puts more money in your capital credit check!

### Pay Your Bill Online

We also provide you the option to pay your bill online. When you login to your account, select **Pay Bill** from the menu on the left. Click on "Make a One-Time Payment." If you are already set up for recurring payments you will be notified at the top of the One-Time payment page. If you wish to make the one-time payment just fill in the requested information and click "Pay Bill" at the bottom of the page. No paper, no mailing, less cost!

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### Annual Notice to Residential Customers for Telephone Assistance Plan (TAP) and the Federal Lifeline Program.

YOU MAY BE ELIGIBLE FOR ASSISTANCE IN PAYING YOUR TELEPHONE BILL IF YOUR HOUSEHOLD INCOME MEETS QUALIFYING INCOME GUIDELINES OR A HOUSEHOLD MEMBER PARTICIPATES IN A QUALIFYING PROGRAM. Refer to [www.mn.gov/puc](http://www.mn.gov/puc) select "For Consumers", select "Telephone Discounts," see "Am I eligible?"



# ASSISTANCE PROGRAMS

## Annual Notice to Residential Customers for Telephone Assistance Plan (TAP) and the Federal Lifeline Program

You may be eligible for assistance in paying your telephone bill if your income is at or below federal guidelines or if you receive benefits from certain assistance programs. For more information or an application, please contact:

Halstad Telephone Company  
345 2nd Avenue West  
Halstad, MN 56548  
(218) 456-2125

Minnesota's Telephone Assistance Plan (TAP) offers a monthly credit of \$7.00 on your landline telephone service. You may receive the TAP credit on one landline per household.

The federal Lifeline Program offers a monthly discount of up to \$9.25 on some landline telephone service plans. Lifeline also offers discounts on some wireless telephone service plans and some broadband internet service plans. You may receive the Lifeline discount on one telephone service per household. The federal Lifeline Program incorporates the broadband discount (not applicable to TAP).

If you live on Tribal lands, you may qualify for additional discounts. Tribal lands Link Up offers a one-time credit of up to \$100 on installation or activation charges. Tribal lands Lifeline offers an additional monthly credit of up to \$25 on your landline or wireless telephone service plan.

The telephone or broadband service must be in your name. You must show proof that you or a member of your household participates in at least one of the following programs or is income eligible:

- Federal Public Housing Assistance (FPHA)
- Medicaid/Medical Assistance (MA)
- Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- Veterans Pension or Survivors Pension Benefit Programs
- Bureau of Indian Affairs General Assistance
- Food Distribution Program on Indian Reservations (FDPIR)
- Tribally administered Head Start (for those meeting income-qualifying standards)
- Tribally administered Temporary Assistance for Needy Families (TTANF)

If you do not participate in any of the programs listed above, you may qualify if your income is at or below 135% of the 2020 Federal Poverty Income Guidelines:

Household size	Income
1	\$17,226
2	\$23,274
3	\$29,322
4	\$35,370
5	\$41,418
6	\$47,466
For each additional person, add	\$6,048

(The federal poverty guidelines are updated at the end of January.)



The National Do Not Call Registry gives you a choice about whether to receive telemarketing calls at home. Most telemarketers should not call your number once it has been on the registry for 31 days.

1. From the phone you want added to the Do Not Call Registry, call 1-888-382-1222
2. Visit [www.donotcall.gov](http://www.donotcall.gov) to register your phone

# Lifeline

Lifeline is a federal program that helps lower the cost of your monthly phone or Internet bill.\*

## HOW TO KEEP YOUR BENEFIT

### USE IT OR LOSE IT

If your mobile phone or Internet is free, use it at least **once every 30 days** to keep the benefit.

### RECERTIFICATION

Each year, Lifeline will conduct a check to ensure you still qualify for the benefit. We will review databases that can verify your participation in qualifying programs.

We will send you a letter asking you to recertify your benefit **ONLY** if we are unable to confirm you are still eligible.

#### What to do if asked to recertify:

- Call (855) 359-4299 **OR**
- Complete the form online at [CheckLifeline.org](http://CheckLifeline.org) **OR**
- Complete the recertification form and mail it to:  
Lifeline Support Center  
P.O. Box 7081  
London, KY 40742

You may check your Lifeline benefit status anytime by calling the Lifeline Support Center, (800) 234-9473.



### TRANSFER YOUR BENEFIT

You may change the phone or Internet company registered with Lifeline at any time.

To do so:

- Talk to your new company to make the switch—some companies may have transfer costs.
- Reapply to Lifeline to confirm you are still eligible.
- Search for a phone or Internet company at [www.LifelineSupport.org](http://www.LifelineSupport.org). Click *Companies Near Me*.

\* If you live on federally recognized Tribal Lands, you may receive an additional discount toward your service.

## LIFELINE SUPPORT CENTER

**(800) 234-9473 | 9 AM-9 PM ET | 7 DAYS PER WEEK**

**[LifelineSupport@usac.org](mailto:LifelineSupport@usac.org) | [www.LifelineSupport.org](http://www.LifelineSupport.org)**

If you are person with a disability and need assistance with your Lifeline application, contact the Lifeline Support Center.

Contact your phone or Internet company about your phone, Internet service, or bill.



# Lifeline

Receive up to \$9.25 off your phone or Internet service

Lifeline is a federal program that helps lower the cost of your monthly phone or Internet bill.\*

## INDIVIDUAL ELIGIBILITY

You qualify for a discount if:

- You participate in any **ONE** of these government benefit programs:
  - Supplemental Nutrition Assistance Program (SNAP)
  - Medicaid
  - Federal Public Housing Assistance (FPHA)
  - Veterans Pension and Survivors Benefit
  - Supplemental Security Income (SSI)

— **OR** —

- Your income is at or below 135% of the federal poverty guidelines

## HOUSEHOLD ELIGIBILITY

*A household is a group of people that share income and expenses.*

- You are only allowed to get **one** Lifeline discount per household.
- If you share housing, complete the **Household Worksheet**.
- The worksheet is available on our website, [www.LifelineSupport.org](http://www.LifelineSupport.org). You can also ask your Lifeline service provider.

## THREE WAYS TO APPLY



**APPLY ONLINE** Find the online application at [CheckLifeline.org](http://CheckLifeline.org).

If you live in CA, OR, and TX, work with your provider to apply.

**OR**



**MAIL YOUR APPLICATION** Print an application from [www.LifelineSupport.org](http://www.LifelineSupport.org).

Fill out and mail it with proof of eligibility to:

Lifeline Support Center  
P.O. Box 7081  
London, KY 40742

**OR**



**CONTACT A PHONE OR INTERNET COMPANY**

Find a company that provides Lifeline at [www.LifelineSupport.org](http://www.LifelineSupport.org).

Click *Companies Near Me*.

## HOW TO SHOW YOU ARE ELIGIBLE

You may need to show proof that you qualify for Lifeline, such as:

- **A copy of your SNAP or program letter** **OR**
- **A copy of your pay stub or tax return** to prove your income is at or below 135% of the federal poverty guidelines.

\*If you live on federally recognized Tribal Lands, you may receive an additional discount toward your service.

If you are person with a disability and need assistance with your Lifeline application, contact the Lifeline Support Center.



Universal Service  
Administrative Co.

## LIFELINE SUPPORT CENTER

(800) 234-9473 | 9 AM-9 PM ET | 7 DAYS PER WEEK  
[LifelineSupport@usac.org](mailto:LifelineSupport@usac.org) | [www.LifelineSupport.org](http://www.LifelineSupport.org)