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April 1, 2015

**VIA ELECTRONIC FILING**

Mr. Dan Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 5510-2147

Re: In the Matter of Joint Petition by Midwest Cable, Inc., Midwest Cable Phone of Minnesota, LLC, and the Minnesota Department of Commerce for Confirmation of Eligibility for TAP Reimbursement  
MPUC Docket No:

Dear Mr. Wolf:

Enclosed via eFiling please find the Joint Petition of Midwest Cable, Inc. a/k/a GreatLand Connections, Inc., Midwest Cable Phone of Minnesota, LLC (collectively "Midwest Cable"), and the Minnesota Department of Commerce ("Department") for Confirmation of Eligibility for TAP Reimbursement. The Department has reviewed the petition and authorizes Midwest Cable to file the petition on its behalf. Also enclosed is an Affidavit of Service in this matter.

Please contact me if further information is needed.

Respectfully submitted,

DORSEY & WHITNEY LLP

s/ Robert E. Cattanach

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*Attorney for Midwest Cable, Inc. and  
Midwest Cable Phone of Minnesota, LLC*

Enclosures  
cc: Parties of Record

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

|                         |              |
|-------------------------|--------------|
| Beverly Jones Heydinger | Chair        |
| Nancy Lange             | Commissioner |
| Dan Lipschultz          | Commissioner |
| John A. Tuma            | Commissioner |
| Betsy Wergin            | Commissioner |

In the Matter of Joint Petition by Midwest Cable, )  
Inc., Midwest Cable Phone of Minnesota, LLC, ) Docket No. \_\_\_\_\_  
and the Minnesota Department of Commerce for )  
Confirmation of Eligibility for TAP )  
Reimbursement )

**JOINT PETITION REGARDING TAP REIMBURSEMENT AND VOIP SERVICE**

Pursuant to the Settlement Agreement executed by and among Midwest Cable, Inc. a/k/a GreatLand Connections, Inc., Midwest Cable Phone of Minnesota, LLC (jointly referred to as “Midwest Cable”), and the Minnesota Department of Commerce (“Department”),<sup>1</sup> and approved by the Minnesota Public Utilities Commission (“Commission”),<sup>2</sup> Midwest Cable and the Department (collectively referred to as “Petitioners”) respectfully submit this Joint Petition seeking an express order from this Commission that Midwest Cable is eligible to receive TAP reimbursement for its interconnected VoIP services.

Midwest Cable agreed in the Settlement Agreement to offer the TAP credit to qualifying customers of voice service and take affirmative steps to make Minnesota customers aware of the

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<sup>1</sup> The Settlement Agreement was executed by Midwest Cable and the Department on February 19, 2015, and filed with the Commission on February 20, 2015. *See In the Matter of the Midwest Cable Phone of Minnesota, LLC Application for Authority to Provide Telephone Service in the State of Minnesota and In the Matter of Midwest Cable Phone of Minnesota, LLC Petition for Approval to Transfer Regulated Customers and Assets* (collectively referred to as “Application for Authority and Petition for Transfer Dockets”), Minnesota PUC Docket Nos. P6927/NA-14-507 and P6927/PA-14-513, Settlement Agreement (Feb. 20, 2015) (“Settlement Agreement”).

<sup>2</sup> The Commission Order approving the Settlement Agreement was issued on March 17, 2015. *See Application for Authority and Petition for Transfer Dockets*, Minnesota PUC Docket Nos. P6927/NA-14-507 and P6927/PA-14-513, Order (Mar. 17, 2015) (“Order”).

availability of the TAP credit consistent with the terms of the Settlement Agreement, once the Commission determined that Midwest Cable is eligible to receive TAP reimbursement. The Settlement Agreement provides that Midwest Cable's commitment to provide the TAP credit to qualifying customers is contingent on the Commission, by its approval of the terms of the Settlement Agreement, making a determination that Midwest Cable is eligible to receive TAP reimbursements for its interconnected VoIP services.<sup>3</sup> The Commission approved the terms of the Settlement Agreement,<sup>4</sup> but, in its summary of the terms of the Settlement Agreement, stated, "Midwest Cable agrees to extend TAP bill credits to VoIP customers upon receiving a Commission order authorizing reimbursement under that program for credits made to VoIP customers."<sup>5</sup> This summary could be understood to contemplate a separate Commission Order specifically authorizing TAP reimbursement.

Consistent with this summary, and to remove any ambiguity, the Petitioners therefore request that the Commission issue an order expressly confirming that Midwest Cable is authorized to receive reimbursement under the TAP program for credits provided to VoIP customers. Granting this Petition will benefit the public interest by ensuring that TAP credits will be available to Midwest Cable's interconnected VoIP customers, as contemplated by the Petitioners when they entered into the Settlement Agreement.

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<sup>3</sup> Settlement Agreement at 2. The Settlement Agreement further states that the Petitioners will file a joint petition if the Commission, in approving the Settlement Agreement, affirmatively does not approve reimbursement. *Id.* Given the language differences between the Settlement Agreement and the Order, Petitioners believe it prudent to file this Petition to confirm that Midwest Cable is eligible for TAP reimbursement for its interconnected VoIP services.

<sup>4</sup> Order at 8.

<sup>5</sup> Order at 3.

For these reasons, Petitioners request a further order expressly confirming Midwest Cable's eligibility for TAP reimbursement, so that Midwest Cable may begin to put in place a framework for its TAP program.

Dated: April 1, 2015

Respectfully submitted,

By: s/ Robert E. Cattanach  
Robert E. Cattanach  
Dorsey & Whitney LLP

By: s/ Linda S. Jensen  
Linda S. Jensen  
Assistant Attorney General

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Attorneys for Midwest Cable Phone, Inc. and  
Midwest Cable Phone of Minnesota, LLC

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA            )  
  ) ss  
COUNTY OF HENNEPIN        )

Kristin K. Berkland hereby certifies that on the 1st day of April, 2015, on behalf of Midwest Cable, Inc., Midwest Cable Phone of Minnesota, LLC, and the Minnesota Department of Commerce she electronically filed a true and correct copy of the enclosed Joint Petition in the State of Minnesota on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Notice of this filing was also provided via electronic service as designated on the attached service list.

/s/ Kristin K. Berkland  
Kristin K. Berkland

Subscribed and sworn to before me  
this 1st day of April, 2015.

/s/ Sharon Kay Leboeuf  
Notary Public, State of Minnesota

| First Name | Last Name  | Email                         | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name   |
|------------|------------|-------------------------------|------------------------------------|--|--------------------|-------------------|---|
| Julia      | Anderson   | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012134         | Electronic Service | No                | GEN_SL_Midwest Cable Phone of Minnesota, LLC_Preliminary Service List |
| Robert     | Cattanach  | cattanach.robert@dorsey.com   | Dorsey & Whitney LLP               | Suite 1500<br>50 South Sixth Street<br>Minneapolis,<br>MN<br>554021498     | Electronic Service | No                | GEN_SL_Midwest Cable Phone of Minnesota, LLC_Preliminary Service List |
| Linda      | Chavez     | linda.chavez@state.mn.us      | Department of Commerce             | 85 7th Place E Ste 500<br><br>Saint Paul,<br>MN<br>55101-2198              | Electronic Service | No                | GEN_SL_Midwest Cable Phone of Minnesota, LLC_Preliminary Service List |
| Linda      | Jensen     | linda.s.jensen@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445<br>Minnesota Street<br><br>St. Paul,<br>MN<br>551012134 | Electronic Service | No                | GEN_SL_Midwest Cable Phone of Minnesota, LLC_Preliminary Service List |
| John       | Lindell    | agorud.ecf@ag.state.mn.us     | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012130         | Electronic Service | No                | GEN_SL_Midwest Cable Phone of Minnesota, LLC_Preliminary Service List |
| Jennifer   | Oberhausen | joberhausen@wbklaw.com        | Wilkinson Barker Knauer LLP        | 2300 N St NW Ste 700<br><br>Washington,<br>DC<br>20554                     | Electronic Service | No                | GEN_SL_Midwest Cable Phone of Minnesota, LLC_Preliminary Service List |
| Daniel P   | Wolf       | dan.wolf@state.mn.us          | Public Utilities Commission        | 121 7th Place East<br>Suite 350<br>St. Paul,<br>MN<br>551012147            | Electronic Service | No                | GEN_SL_Midwest Cable Phone of Minnesota, LLC_Preliminary Service List |