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August 20, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket No. P999/CI-14-470

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce in response to the Minnesota Public Utilities Commission's August 5, 2014 Notice of Comment Period in the Matter of the Telephone Assistance Plan (TAP) Annual Review.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ DIANE DIETZ
Rate Analyst

DD/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. P999/CI-14-470

I. CASE HISTORY

On August 5, 2014, the Minnesota Public Utilities Commission (Commission) issued its August 5, 2014 Notice of Comment Period in the Matter of the Telephone Assistance Plan (TAP) Annual Review in Docket No. P999/CI-14-470.

II. STATUTORY AUTHORITY

Minnesota Statutes Sections 237.69 - .711 govern the Telephone Assistance Plan (TAP). In particular, under Minnesota Statute section 237.70, subd. 1, the Commission has been granted authority to develop a TAP.

Minnesota Rules Chapter 7817 establishes guidelines for the implementation of TAP.

III. COMMENTS

A. BACKGROUND

On July 10, 2013, the Minnesota Public Utilities Commission (Commission) issued its Order Establishing New Credit and Surcharge Levels in Docket No. P999/CI-13-213. In that Order, the TAP credit available to eligible customers was increased from \$2.50 to \$3.50 per month. The monthly TAP surcharge was reduced from \$.06 to \$.03 per access line. The rates were implemented on October 1, 2013, or the first billing cycle thereafter.

B. TAP BENEFIT AND SURCHARGE LEVELS

In the Commission's 2013 annual review of TAP benefit and surcharge levels, the Commission chose to increase the monthly TAP benefit and decrease the monthly TAP surcharge in recognition of two developments in federal regulatory law that affected the TAP

program – changes affecting the price of local service and changes affecting the number of TAP recipients.¹ Consideration of these two developments is relevant in the current docket.

1. Change in Federal Law Affecting the Price of Local Service

On November 18, 2011, the FCC released its Universal Service Fund-Intercarrier Compensation Report and Order and Further Notice of Proposed Rulemaking.² The FCC adopted a rule to limit high-cost local loop support in instances where end-user rates for basic local telephone service do not meet a price floor established by the FCC. The FCC implemented the local rate floor “beginning with an initial rate floor of \$10 for the period July 1, 2012 through June 30, 2013 and \$14 for the period July 1, 2013 through June 30, 2014.³ Beginning July 1, 2014, the rate floor was suspended at \$14.00 until January 2, 2015, at which point it will be \$16.00. As of July 1, 2016, the rate floor will set at the lower of either be \$18.00 or the rate floor level established by the FCC’s 2016 urban rate survey. Beginning on July 1, 2017, the rate floor will be the lower of either \$20.00 or the rate floor established by the 2017 urban rate survey.⁴

The FCC’s November 18, 2011 Order and subsequent related Orders directly affect Lifeline and TAP subscribers, as well as all other customers of local telephone service provided by companies that receive high cost support. While local carriers are not required to raise their local rates to the FCC determined rate floor level, local carriers with rates below the rate floor level will lose high cost universal service funds on a dollar for dollar basis. As a result, local carriers have raised rates, making local telephone service less affordable for low-income households. Future increases in the rate floor level are will make local telephone service even less affordable for low-income households.

2. Change in Federal Law Affecting the Number of TAP Recipients

The Commission’s July 10, 2013 Order Establishing New Credit and Surcharge Levels included the following statement on page 3:

The FCC has jurisdiction over the federal Lifeline program, which also subsidizes local telecommunications service for low-income households. Local service providers that provide both Lifeline and TAP subsidies use the Lifeline rules to determine eligibility for both programs.⁵

¹ July 10, 2013 Order in the Matter of the Telephone Assistance Plan Credit and Surcharge Levels in Docket No. P999/CI-13-213.

² WC Docket No. 10-90, GV Docket 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, and WT Docket No. 10-208 (USF-ICC Order)

³ See paragraphs 234 through 247 in the November 18, 2011 Order.

⁴ June 10, 2014 Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, WC Docket No. 10-90, WT Docket No. 10-208, WC Docket No. 14-58, WC Docket No. 07-135, CC Docket No. 01-92.

⁵ See Minn. Rules part 7817.0600.

In 2012 the FCC began requiring local service providers to disenroll subscribers that fail to document their eligibility annually.⁶ This has reduced subscribership in both programs by approximately 43%.⁷

The Commission's July 10, 2013 Order (page 3) described the impact of the FCC's mandated annual recertification as follows:

The Department projects the number of access lines in Minnesota at 2,100,237 [for the year 2013]. Last year local exchange carriers reported serving 73,659 TAP customers; this year the Department estimates the number to be 40,580 [as of the second quarter of 2013].

According to the Commission Staff Briefing Papers issued with the August 5, 2014 Notice of Comment Period, the estimated number of TAP subscribers as of the end of the year 2013 were remarkably close to the post-recertification estimates at 40,412.

3. *TAP Fund Balance*

The reliability of the fund balance estimate is dependent on the level of TAP subscribership as well as the number of landline telephones that form the funding base for TAP. Since the introduction of the FCC's recertification process in the year 2012, the level of TAP subscribership has stabilized at approximately 40,000 households per year.

In recent years, there has been a declining number of landline telephones that form the funding basis for the TAP fund. The number of access lines that are assessed the monthly TAP surcharge decreased from 2,073,415 in the year 2012 to 1,948,566 in the year 2013.⁸ The downward trend in access lines is partially due to some companies discontinuing their collection and remittance of the TAP surcharge, arguing that their services are not subject to the Commission's jurisdiction. This trend will continue absent the Commission addressing the applicability of TAP, TAM and 911 surcharges to services provided using voice over internet protocol (VoIP) technology. The decline in the number of assessable access lines does not appear to warrant an adjustment to the TAP surcharge or credit levels at this time.

4. *Affordability of Telephone Service*

While the FCC has decided to maintain the existing \$14 price floor until January 2, 2015, additional increases in the price floor are expected to occur over the next several years. As previously stated, increases in the price floor may make local telephone service increasingly less affordable for low-income subscribers. The Commission Staff's Briefing Papers, in the current docket, discuss the impact of TAP on the price of basic local service in the following statement:⁹

⁶ See 47 C.F.R. §54.410.

⁷ See generally *In the Matter of the 2012 Lifeline Re-Certification Results*, Docket No. P999/M-12-1315.

⁸ *Id.* at page 4.

⁹ *Id.* at page 6.

The TAP credit is currently at \$3.50 per household. TAP is given on top of the federal Lifeline benefit which is now \$9.25. Thus, the combined low-income support for eligible Minnesotans is \$12.75 per household. That is about 80 percent of a \$16 monthly telephone bill.

In addition to the monthly service fee, customers also pay various taxes and fees on their monthly bill. The following fees and taxes are typically added to a monthly bill: (i) federal excise tax of 3 percent, (ii) state and local taxes, (iii) TAP fee of \$.03 per line, (iv) Telecommunications Access Minnesota fee of \$.06 per line, (v) 911 fee of \$.78 per line, (vi) federal access charge/subscriber line charge that varies by local service provider, and (vii) extended area service charges that vary by exchange and by local service provider.¹⁰ Taken together, these additional fees and taxes can add \$10 or more to a monthly telephone bill. All taxes and fees should be considered when studying the affordability of telephone service to low income households.

To the extent the Commission decides to maintain the current TAP surcharge and credit levels, the Commission will likely have to revisit the issues sometime before the fourth quarter of the year 2015, when the TAP fund balance may potentially drop toward an unsustainable level. At that time, the FCC's price floor for basic local service will be \$16.00 and will be set to increase to as much as \$18.00 by the middle of the following year.

IV. COMMISSION ALTERNATIVES

1. Maintain the current TAP credit and surcharge levels.
2. Modify the monthly TAP credit and/or surcharge.

V. DEPARTMENT RECOMMENDATION

1. Maintain the current TAP credit and surcharge levels.

/ja

¹⁰ Extended Area Service charges are included when calculating the FCC rate floor.

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. P999/CI-14-470

Dated this 20th day of **August 2014**

/s/Sharon Ferguson

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Registered	Agent	N/A	LSSI Data Corp.	c/o CT Corporation System, Inc. 100 So. 5th Street, Suite 1075 Minneapolis, MN 55402	Paper Service	No	SPL_SL_14-470_Initial Mailing
Francis X	Ahearn	fahearn@mcgrawcom.net	McGraw Communications, Inc.	521 5th Ave Floor 14 New York, NY 10175-1200	Electronic Service	No	SPL_SL_14-470_Initial Mailing
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Jim	Beattie	N/A	Blue Earth Valley Telephone Co.	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-470_Initial Mailing
Jim	Beattie	N/A	Eckles Telephone Company dba BEVCOMM	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-470_Initial Mailing
Jim	Beattie	N/A	Cannon Valley Telecom, Inc.	123 W 7th St Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jim	Beattie	N/A	Easton Telephone Co.	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-470_Initial Mailing
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Mark	Birkholz	N/A	Clements Telehone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
Mark	Birkholz	N/A	Osakis Telephone	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
Mark	Birkholz	N/A	Mainstreet Communications, LLC	150 Second St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
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Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dwayne	Johnson	jtcbusiness@means.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Melanie	King	melanie.king@tagmobile.com	Tag Mobile, L.L.C.	1330 Capital Pkwy Carrollton, TX 75006-3647	Electronic Service	No	SPL_SL_14-470_Initial Mailing
William	King	billking@youbetnet.net	KTF Telcom	2156 Poplar St Mora, MN 55051	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Rex	Knowles	Rex.Knowles@xo.com	XO Communications Services, Inc.	8851 Sandy Parkway Sandy, UT 84070	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Jim	Koep	utilities@lakefieldmn.com	Lakefield Public Utilities	PO Box 1023 Lakefield, MN 56150	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Jeff	Korn	jkorn@storesonline.com	Crexendo Business Solutions, Inc.	1303 N. Research Way Orem, UT 84097	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Andrew	Labbe	andrew.labbe@level3.com	Level 3 Communications, LLC	1025 Eldorado Blvd Broomfield, CO 80021	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Renee	Ladd	rladd@aman.com	ARNAN Services, Inc.	5125 Mill Road Red Wing, MN 55066	Electronic Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_14-470_Initial Mailing
Colleen	Lockett	regulatory@intrado.com	Intrado Communications Inc.	1601 Dry Creek Dr. Longmont, CO 80503	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Mary	Lohnes	mary_lohnes@mmi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Greg	Lohrenz	gregl@aitech.net	Advanced Integrated Technologies	9855 W 78th St Ste 300 Eden Prairie, MN 55344	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Kurt	Maass	N/A	TTM Operating Corporation, Inc.	Suite 210 146 N. Canal Street Seattle, WA 98103	Paper Service	No	SPL_SL_14-470_Initial Mailing
James	MacKenzie	info@wimactel.com	WiMacTel, Inc.	13515 I Circle Omaha, NE 68137	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Lee	Maier	lee@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Thomas	Margavio	tm5886@att.com	BellSouth Long Distance, Inc.	AT&T Midtown Center 675 W Peachtree Ste 17E21 Atlanta, GA 30375	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Tom	Maroney	tmaroney@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Katherine Barker	Marshall	N/A	US Signal Company, L.L.C.	201 Ionia Avenue SW Grand Rapids, MI 49503	Paper Service	No	SPL_SL_14-470_Initial Mailing

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Paul	Masters	pmasters@ernestgroup.com	Ernest Communications, Inc.	Suite 150 5275 Triangle Parkway Norcross, GA 30092	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Laura	Matosian	regulatory@comtech21.com	COMTECH 21, LLC	One Barnes Park South Wallingford, CT 6492	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Joe	Mattison	jmattison@telephoneassociates.com	Telephone Associates, Inc.	329 Grand Avenue Superior, WI 54880	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Robert W.	McCausland	robert.mccausland@h3net.com	Hypercube Telecom, LLC	3200 W Pleasant Run Rd Ste 300 Lancaster, TX 75146	Electronic Service	No	SPL_SL_14-470_Initial Mailing
James	McKnight	JMCKNIGHT@mediacomc.com	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way Mediacom, NY 10918	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Eileen	McWilliams	bademaileileen.mcwilliams@verizon.com	Verizon Select Services, Inc.	1717 Arch St., 4 North Philadelphia, PA 19103	Paper Service	No	SPL_SL_14-470_Initial Mailing
Johnny	Michael	jbekuto@yahoo.com	Worldview Video Relay Service d/b/a Worldview VRS	3832 Dunbar Ct Brooklyn Park, MN 55443-1975	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Robert A	Millar	robert.millar@crowncastle.com	NextG Networks of Illinois, Inc.	c/o CROWN CASTLE 2000 Corporate Dr Canonsburg, PA 15317	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Keith	Modglin	keith.modglin@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Dr Onamia, MN 56359-2236	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Richard	Monto	rmonto@inteliquent.com	Neutral Tandem-Minnesota, LLC	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael R.	Moore	michael.moore@chartercom.com	Charter Communications, Inc.	12405 Powerscourt Drive St. Louis, MO 63131	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Monty	Morrow	montymorrow@nu-telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Katherine	Mudge	katherine.mudge@megapath.com	MegaPath Corporation	1835-B Kramer Ln Ste 100 Austin, TX 78758	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Julie	Musselman Oost	regulatory@airustel.com	Airus, Inc.	840 S Canal St FL 7 Chicago, IL 60607-4519	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Steve	Nasby	snasby@windom-mn.com	City of Windom	444 9th St PO Box 38 Windom, MN 56101-0038	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Mike	Nelson	N/A	Comcast Phone of Minnesota, Inc.	183 Inverness Drive West Englewood, CO 80112	Paper Service	No	SPL_SL_14-470_Initial Mailing
Daniel C.	Nelson	dcndtc@bevcomm.net	Dunnell Telephone Company, Inc.	PO Box 42 110 N Seeley Ave Dunnell, MN 56127	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Keith	Nussbaum	keith@preferredlongdistance.com	Preferred Long Distance, Inc.	Suite 350 16830 Ventura Blvd. Encino, CA 91436	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Matt	O'Flaherty	offaherty.matt@gmail.com	SelecTel, Inc.	1825 N Bell St Freemont, NE 68025	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Joseph	O'Hara	N/A	Zone Telecom, LLC	3130 Pleasant Run Springfield, IL 62711	Paper Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Robert	Olson	rolson@emily.net	Emily Cooperative Telephone Company	PO Box 100 Emily, MN 564470100	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Jennifer	Ong	jennifer.ong@timestelecomusa.com	Yestel USA, Inc.	4343 E Lowell St c/o TIMES TELECOM USA Ontario, CA 91761-2222	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Mike	Orcutt	mgorcutt@nttservices.com	Nebraska Technology & Telecommunications, In.	2308 S. 156 Circle Omaha, NE 68130	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Eric James	Osterberg	staff@soundchoicecomm.com	Sound Choice Communications, LLC	PO Box 17010 Minneapolis, MN 55417	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Bill	Otis	N/A	Sleepy Eye Telephone Co.	27 N. Minnesota Street PO Box 697 New Ulm, MN 56073	Paper Service	No	SPL_SL_14-470_Initial Mailing
Bill	Otis	billotis@nu-telcom.net	New Ulm Telecom, Inc.	PO Box 697 27 North Minnesota St New Ulm, MN 56073-0697	Paper Service	No	SPL_SL_14-470_Initial Mailing
Craig	Otterness	otter@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Donna	Palumbo	donna.palumbo@ipc.com	IPC Network Services, Inc.	3 2nd St 15th Floor Jersey City, NJ 07311	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Kimm	Partridge	kimm.partridge@ucn.net	UCN, Inc.	Suite 500 7730 S. Union Park Avenue Midvale, UT 84047	Electronic Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Mark	Pavol	regulatory@ymaxcorp.com	YMAX Communications Corp.	5700 Georgia Ave West Palm Beach, FL 33405	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Rochelle	Pervisky	RPervisky@exchange.hbcicom	Hiawatha Broadband	58 Johnson Street Winona, MN 55987	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Linda	Peterson	N/A	C-I Communications, Inc.	1102 Madison St Brainerd, MN 56401	Paper Service	No	SPL_SL_14-470_Initial Mailing
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	SPL_SL_14-470_Initial Mailing
THOMAS	QUINN	TOM.QUINN@SUNGARD.COM	SunGard NetWork Solutions Inc.	680 E SWEDESFORD RD WAYNE, PA 19087	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Terry	Ray	tray@extenetsystems.com	ExteNet Systems, Inc.	Suite 340 3030 Warrenville Road Lisle, IL 60532	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Jeff	Reynolds	bademailjeff@telequality.com	TeleQuality Communications, Inc.	Suite 207 16601 Blanco Road San Antonio, TX 78232	Paper Service	No	SPL_SL_14-470_Initial Mailing
Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25 Wawina, MN 557369721	Electronic Service	No	SPL_SL_14-470_Initial Mailing

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Robert	Riddell		Wilderness Valley Telephone Co. Inc.	13448 Co. Rd. 25 Wawina, MN 557369721	Paper Service	No	SPL_SL_14-470_Initial Mailing
Robert S	Rife	grodham@diversifiedconsulting.net	Broadband Dynamics, LLC	8757 E Via De Commercio FL 1 Scottsdale, AZ 85258-3359	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Jennifer	Rise	jrise@702com.net	VAL-ED Joint Venture LLP	702 Main Avenue Moorhead, MN 56560	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Mark	Roach	mark.roach@ctctelcom.net	Consolidated Telephone Company	1102 Madison Street PO Box 972 Brainerd, MN 56401	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Vernell	Roberts	vroberts@lakesnet.net	Detroit Lakes Public Utilities	1025 Roosevelt Ave Detroit Lakes, MN 56501	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Natalia	Rodrigues	nrodrigues@wcs.com	Wholesale Carrier Services, Inc.	5471 N. University Drive Coral Springs, FL 33067	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Jeffrey	Roiland	jeff.s.roiland@gmail.com	Lake Communications	409 17th Ave Two Harbors, Mn 55616	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Michelle	Salisbury	michelle.salisbury@crowncastle.com	NewPath Networks, LLC	c/o CROWN CASTLE 2000 Corporate Dr Canonsburg, PA 15317	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Curtis A	Sampson	bademaildspeiser@hcctel.net	O.U. Connection, Inc.	PO Box 697 27 N Minnesota St New Ulm, MN 56073	Paper Service	No	SPL_SL_14-470_Initial Mailing
Betty	Sanders	betty.sanders@chartercom.com	Charter Fiberlink, LLC	12405 Powerscourt Drive St. Louis, MO 63131	Electronic Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jill	Sandford	jill.sandford@zayo.com	Zayo Group, LLC	360 Hamilton Avenue White Plains, NY 10601	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Travis	Schmidt	tschmidt@mpsutility.com	Moorhead Public Service	500 Center Ave. PO Box 779 Moorhead, MN 56561	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Bruce	Schoonover	bruce.schoonover@knology.com	Knology of the Plains, Inc.	1241 OG Skinner Dr West Point, GA 31833-1789	Electronic Service	No	SPL_SL_14-470_Initial Mailing
David	Schornack	N/A	Arrowhead Communications Corporation	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
David	Schornack	N/A	East Otter Tail Telephone Company	150 2nd Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	SPL_SL_14-470_Initial Mailing
David	Schornack	N/A	The Peoples Telephone Company of Bigfork	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
David	Schornack	N/A	Felton Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
David	Schornack	N/A	Callaway Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing

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David	Schornack	N/A	Twin Valley-Ulen Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
David	Schornack	N/A	Loretel Systems, Inc.	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-470_Initial Mailing
David	Schornack	N/A	Hector Communications Corporation (H)	(on behalf of Arrowhead Communications Corp) 27 North Minnesota St New Ulm, MN 56073	Paper Service	No	SPL_SL_14-470_Initial Mailing
John	Schultz	jschultz@u-rekabroadband.com	U-reka Broadband Ventures, LLC	176 Rutherford Rd Stillwater, MN 55082	Paper Service	No	SPL_SL_14-470_Initial Mailing
Kevin	Seamans	KEVIN.SEAMANS@BESTBUY.COM	BBY Networks, Inc	7601 Penn Ave. Richfield, MN 55423	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Omesh	Sharma	Omesh.sharma@clearfly.net	Greenfly Networks, Inc. dba Clearly Communications	PO BOX 77706 San Francisco, CA 94107	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 126 South Main Street Lonsdale, MN 55046-0358	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Phyllis	Sims	bademailsimsph@dpiteconnect.com	Unity Telecom, LLC	1330 Capital Pkwy Carrollton, TX 75006-3647	Paper Service	No	SPL_SL_14-470_Initial Mailing
David J.	Smat	regulatory@ingts.com	iNetworks Group, Inc.	Suite 2510 125 S. Wacker Drive Chicago, IL 60606	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Compliance	Specialist	Compliance@velocity.org	Velocity The Greatest Phone Company Ever, Inc.	7130 Spring Meadows W Dr Holland, OH 43528	Electronic Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sabrina	Spruill	bademail_Sabrina@mobilitie.com	Mobilitie, LLC	660 Newport Center Drive, Suite 200 Newport Beach, CA 92660	Paper Service	No	SPL_SL_14-470_Initial Mailing
Kate	Stem	kate.stem@accesspointinc.com	Access Point, Inc.	1100 Crescent Green, Ste. 109 Cary, NC 27518	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Rick	Stern	rstern@nitelusa.com	Network Innovations, Inc. d/b/a Nitel	1101 W Lake St. Chicago, IL 60657	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Wayne	Stowman	wstowman@rtelnet.net	Rothsay Telephone Company	137 1st St NW Rothsay, MN 56579	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Keith	Stubbe	tunesrus@iw.net	Southwest Minnesota Broadband Services	PO BOX 1006 Lakefield, MN 56150	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East Cedar P.O. Box 360 Houston, MN 559430360	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Lorren	Tingsdal	lorren@mabeltel.coop	Harmony Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277 Upsala, MN 56384	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Brad	VanLeur	bvanleur@orbitcominc.net	OrbitCom, Inc.	1701 North Louise Avenue Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_14-470_Initial Mailing
William	VanderSluis	N/A	Mankato Citizens Telephone Company	221 E. Hickory Street PO Box 3248 Mankato, MN 56002-3248	Paper Service	No	SPL_SL_14-470_Initial Mailing
William	VanderSluis	N/A	Crystal Communications, Inc.	221 E. Hickory Street Mankato, MN 56001	Paper Service	No	SPL_SL_14-470_Initial Mailing
William	VanderSluis	regulatory@hickorytech.com	Enventis Telecom, Inc.	221 E Hickory St Mankato, MN 56001-3610	Electronic Service	No	SPL_SL_14-470_Initial Mailing
William	VanderSluis	N/A	Heartland Telecommunications Company of Iowa	221 East Hickory Street SW Mankato, MN 56001	Paper Service	No	SPL_SL_14-470_Initial Mailing
Karl	Wardin	ww3587@att.com	AT&T Corp	225 W Randolph St, 27C350 Chicago, IL 60606	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Kent	Westphal	kwestphal@mypremieronline.com	Northern Iowa Telephone Company	PO Box 200 339 1st Ave E Sioux Center, IA 51250	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Bruce	White	bademailscovill@telecomsys.com	Telecommunication Systems	275 West Street Annapolis, MD 21401	Paper Service	No	SPL_SL_14-470_Initial Mailing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Whiting	mwhiting@corp.earthlink.com	EarthLink Business, LLC	2610 Horizon Dr Ste B Grand Rapids, MI 49546	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Tom	Wierimaa	N/A	Mosaic Networx LLC	454 Las Gallinas Ave Ste 145 San Rafael, CA 94903	Paper Service	No	SPL_SL_14-470_Initial Mailing
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Lyle R.	Williamson	Lyle.Williamson@Verizon.com	Verizon Wireless	8350 E Crescent Pkwy Ste 200 Greenwood Village, CO 80111	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Karrie	Willis	kwillis@popp.com	POPP.com, Inc.	620 Mendelssohn Ave N Golden Valley, MN 55427	Electronic Service	No	SPL_SL_14-470_Initial Mailing
David	Wolf	dwolf@gctel.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	SPL_SL_14-470_Initial Mailing
Cliff	Woodbury	cliff.woodbury@ies911.com	Independent Emergency Services LLC	235 Franklin St SW Hutchinson, MN 55350-0279	Electronic Service	No	SPL_SL_14-470_Initial Mailing