

# Mendoza Law Office, LLC

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February 19, 2015

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, MN 55101

Re: In the Matter of Possible Amendment to Rules Concerning White Pages  
Directory Publication and Distribution (MPUC Docket No: P-999/R-13-459)

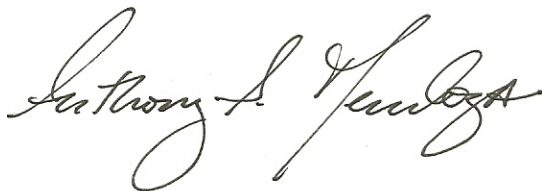
Dear Mr. Wolf:

Enclosed for filing are Comments from the Minnesota Cable Communications Association (MCCA) in the Matter of Possible Amendment to Rules Concerning White Pages Directory Publication and Distribution.

Please contact me if you have any questions about this filing.

Very truly yours,

MENDOZA LAW OFFICE, LLC

A handwritten signature in cursive script, reading "Anthony S. Mendoza". The signature is written in black ink and is positioned above the printed name.

Anthony S. Mendoza

Enc.

cc: Service List

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
John Tuma	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

Possible Amendment to Rules Concerning  
White Pages Directory Publication and Distribution      MPUC Docket No.: P-999/R-13-459

**COMMENTS OF MINNESOTA CABLE COMMUNICATIONS ASSOCIATION**

**I. Introduction.**

The Minnesota Cable Communications Association (“MCCA”) has participated in this rulemaking from its inception as well as in the proceedings that led to its initiation wherein first Frontier Communications<sup>1</sup>, and later Dex Media East, Inc.<sup>2</sup> petitioned for a variance from the Minnesota Public Utilities Commission’s (“MPUC’s”) residential white pages directory delivery rules. The MCCA strongly supports and appreciates the key elements of the MPUC’s proposed amendments, which eliminate saturation delivery of white pages directories. However, the rules as amended do not mitigate the risk that subscribers may in the future have to possess and look through multiple white page directories to find a listing. This scenario is possible because a the rule amendments should, but do not, facilitate cooperation among local service providers necessary to

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<sup>1</sup> “Petition of Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota for a Waiver of Rule 7810.2900 Regarding the Distribution of Telephone Directories,” MPUC Docket No. P405/AM-12-140, May 1, 2012.

<sup>2</sup> “Petition of Dex Media East, Inc., Pursuant to Minn. Stat. § 237.081, Subd. 1, for a Waiver of Rules 7810.2900 and 7812.0600 regarding distribution of telephone directories in the territory and exchanges served by Qwest Corporation d/b/a CenturyLink in the State of Minnesota” MPUC Docket No. P421/AM-12-1236, Nov. 12, 2012.

provide subscribers with access to a single directory that includes listings for all subscribers in their local calling area or portion thereof, regardless of the subscriber's local service provider.

These Comments first identify the major achievements of the proposed rule amendments in furthering the public interest consistently with and in furtherance of the State's goals the legislature has directed the MPUC to consider. Second, the Comments discuss the amendments' failure to facilitate the cooperation among providers needed to give subscribers ready access to useful directories and suggest further rule amendments to address this issue. MCCA has attached as Appendix A its proposed revisions to the Commission's Proposed Permanent Rules attached to the Commission's January 8, 2015 Notice of Intent to Adopt Rules Without a Public Hearing.

**II. The Amendments to the Rules Recognize that Saturation Delivery of Printed Directories is no longer in the Public Interest.**

As clearly established in the record of this proceeding, many subscribers across the county have little, if any, use for a printed residential white pages directory, and would prefer not to receive one. If they do receive one, most immediately dispose of it. Local authorities have complained of the waste involved in collecting and recycling these unwanted directories. The MPUC is correct to recognize that saturation delivery of residential white pages is no longer in the public interest. In permitting local service providers to satisfy their directory obligations, in the absence of a customer request for a printed directory, by publishing an electronic directory, the MPUC's rule amendments recognize how widespread access to the internet has greatly diminished the need for printed directories.

In promulgating these rule amendments, the MPUC is fulfilling its statutory goals of “maintaining or improving quality of service” and “promoting customer choice.” Minn. Stat. § 237.011 (5) and (6). Delivering directories to customers who do not want them is poor customer service. Allowing customers to request a printed directory if they want one, promotes customer choice. Giving providers a choice of their primary publishing format, printed or electronic, gives every provider the ability to decide how to best serve its customers given its resources.

The MCCA also very much appreciates the MPUC’s insistence in the rule amendments that the process for requesting a printed directory not provide a marketing opportunity. As the MPUC knows, competitive local service providers in Minnesota, who operate with interconnection agreements with Frontier and CenturyLink, do not publish their own directories. Instead, according to the terms of their agreements, these competitors provide their subscriber listings to the incumbent carrier. The incumbent then arranges for publication and distribution of directories. Competitive providers would be disadvantaged by a process that requires their customers to contact the incumbent to receive a directory if the incumbent could use that opportunity to market its services and encourage callers to change providers. By prohibiting such practices, the MPUC follows its statutory mandate to “encourage fair and reasonable competition for local exchange telephone service in a competitively neutral manner.” Minn. Stat. § 237.011 (4).

**III. The Rule Amendments should, but do not, ensure the publication of reasonably comprehensive residential white pages directories.**

At present, local service customers in Frontier and CenturyLink service territories receive a directory that contains the listings of the incumbent carrier as well as the

incumbent's interconnected local service wireline competitors. Although there are numerous local service providers operating in these service territories, customers receive a single directory that is reasonably comprehensive. While these directories do not contain unpublished listings or wireless listings, it is much more convenient for customers than having a separate directory from each provider that contains only that provider's listings. It is difficult to imagine any customer preferring a separate directory from each provider rather than a single reasonably comprehensive directory. Subscribers have access to comprehensive directories not because of the directory rules, but because of the Telecommunications Act, 47 U.S.C. § 251(b)(3) and rules promulgated by the FCC under the Act, 47 C.F.R. § 51.217.

The Telecommunications Act of 1996 required all local exchange carriers to permit competing providers to have "nondiscriminatory access" to directory listings. The FCC defined nondiscriminatory access as access "that is at least equal to the access that the providing local exchange carrier (LEC) itself receives." 47 C.F.R. § 51.217(a)(2). The FCC further ordered that "directory listing" "be defined as a verb that refers to the act of placing a customer's listing information in a directory assistance database or in a directory compilation for external use (such as white pages)." *In re Implementation of the Telecommunications Act of 1996, Third Report and Order in CC Docket No. 96-115, Second Order on Reconsideration of the Second Report and Order in CC Docket No. 96-98, and Notice of Proposed Rulemaking*, FCC, CC Docket No. 99-273 (Sept. 9, 1999) at ¶ 160. This interpretation of directory listing led the a court to require US West Communications, Inc. (a legacy Bell Operating Company later acquired by Qwest Corporation and more recently by CenturyLink), to enter into interconnection agreements

that required it to publish directory listings for competitive providers of local service along with its own listings. *US West Communications, Inc. v. Hix*, 93 F.Supp.2d. 1115, 1132 (D. Colo. 2000). The interconnection agreement CenturyLink offers on its website to competitors contains provisions offering nondiscriminatory white page directory listings to competitive providers.<sup>3</sup> As a result of all of this, subscribers in CenturyLink territory now have access to a single comprehensive directory.

Under the MPUC's directory rules, it is entirely possible that in the absence of the above referenced provisions in interconnection agreements, customers could receive a directory that lists only fellow subscribers of their provider. If a customer did not know the provider of a party the customer would like to call, the customer would have to guess which provider's directory contains the listing, and either request hardcopies or search online through multiple directories. Many customers would be handicapped in attempting to do this because few would be aware of all of the local service providers operating in their local calling area.

The MPUC's current rules and rule amendments require local service providers to publish their directory listings, but they do not require them to cooperate in assembling more comprehensive listings. While current interconnection agreements are in effect, this concern may be ignored without consequence. However, many interconnection agreements with Frontier and CenturyLink are in evergreen status, awaiting replacement by subsequent agreements that may have very different terms with respect to directory listings and publication than those in effect today. The FCC may revise its rules or Congress may rewrite the Telecommunications Act and change the federal framework for

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<sup>3</sup>. CenturyLink's "Negotiations Template Agreement" July 7, 2014, section 10.4, found at <http://www.centurylink.com/wholesale/clecs/nta.html>CenturyLink.com/wholesale.

directories. Without state rules in place mandating cooperation with respect to directories, the MPUC cannot be assured of avoiding the balkanization of directories. While the rule amendments as proposed do give customers more choice, the choices available to them could turn out to be of little utility. In addition, in the absence of nondiscriminatory directory listing requirements, the largest provider could have a competitive advantage over others by virtue of having a more comprehensive directory because it has more customers.

The MCCA has urged the MPUC to adopt a rule that would require local service providers to include in their directories the listings of other providers on reasonable rates, terms, and conditions and to make their own listings similarly available for inclusion in the directories of others.

The MCCA proposed that new rules be added requiring every local service provider to accept and publish the listings of other local service providers upon a nondiscriminatory basis. In addition, MCCA proposed a rule requiring all local service providers to make their listings available to others for inclusion in directories at reasonable rates and upon reasonable terms and conditions. Specifically, the MCCA proposed new rules 7811.0630 and 7812.0630:

**7811.0630 CUSTOMER LISTINGS - NONDISCRIMINATION.**

A. If a local service provider wishes to list its customers' telephone numbers in the same directory as another local service provider, such local service provider must permit the listings on a nondiscriminatory basis.

B. Local service providers shall provide publishers and any other person or businesses with reasonable, nondiscriminatory access to subscriber listing information for the purpose of publishing telephone directories and all such information shall be provided at reasonable rates and subject to reasonable terms and conditions.

## **7812.0630 CUSTOMER LISTINGS - NONDISCRIMINATION.**

A. If a local service provider wishes to list its customers' telephone numbers in the same directory as another local service provider, such local service provider must permit the listings on a nondiscriminatory basis.

B. Local service providers shall provide publishers and any other person or businesses with reasonable, nondiscriminatory access to subscriber listing information for the purpose of publishing telephone directories and all such information shall be provided at reasonable rates and subject to reasonable terms and conditions.

The MPUC's Statement of Need and Reasonableness ("SONAR") includes a section VII Regulatory Analysis. Under part G of that subheading, Minn.Stat. § 14.131(7) asks the MPUC to assess "any differences between the proposed rule and existing federal regulations and a specific analysis of the need for and reasonableness of each difference." The SONAR answers that "[n]o existing federal regulations concern the requirement to provide telephone directories as a basic aspect of telephone service. Accordingly, there are no differences to assess." SONAR at 10.

While it is true that federal rules and regulations do not require a telephone service provider to publish a directory, as noted above, the FCC has required all local exchange carriers that provide nondiscriminatory access to directory listings, access that "is at least equal to the access that the providing local exchange carrier itself receives." 51.217 (a)(2) and (b). If a local exchange carrier chooses to publish a directory, it has an obligation to accept the listings of its competitors on a nondiscriminatory basis. The proposed rule amendments thus depart from federal regulations in this important aspect.

### **IV. Proposed Rule 7811/7812.0600, subpart F Lacks Clear Rationale and Demonstrated Public Need or Benefit.**

With respect to draft subpart F of Proposed Rule 7811/7812.0600, MCCA's understanding of the phrase "and, upon a customer request and in the customer's



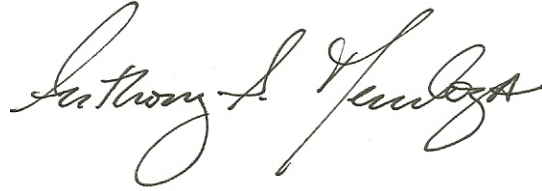
preferred format, one copy of any other directory within the local calling area” would mean that each local service provider would not only be required to provide a “complete directory” for customers in its own local service area, but would also be required to provide a copy of a complete directory from another local service provider’s calling area. For example, Mediacom, serving a customer in Mound, where Frontier/Citizens is the ILEC, would, upon a customer’s request, have to provide a complete directory for Rosemount, where CenturyLink is the ILEC. This could mean that Mediacom would be required to provide a complete printed directory for Rosemount. And depending on how Citizens/Frontier complies with the “complete directory” requirement in Rosemount, the Mediacom customer in Mound may or may not get the desired directory. The rationale for such a policy is unclear and has not been established in the record of this proceeding. And given the technological capabilities available today for searching and obtaining customer listings on-line as well as the shortcomings of printed directories identified by many parties commenting on this docket, it seems unnecessary and arbitrary to require local service providers to provide complete directories for geographic areas that they do not serve or which are not part of their local calling area. MCCA believes this requirement could result in customer frustration and impose unnecessary costs on local service providers while providing little if any benefit to consumers.

### **Conclusion**

The MCCA supports the MPUC’s effort to update the directory rules and encourages it to adopt rules to facilitate the cooperation of local service providers in making available the most comprehensive and useful directories possible.

MINNESOTA CABLE  
COMMUNICATIONS ASSOCIATION

Dated: February 19, 2015

A handwritten signature in cursive script, reading "Anthony S. Mendoza". The signature is written in black ink and is positioned above the typed name and contact information.

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J. Jeffery Oxley, Esq.  
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## Appendix A - MCCA Proposed Permanent Rules Relating to Residential White Pages Directory

### Publication and Distribution

#### 7810.0100 DEFINITIONS.

[For text of subps 1 to 11, see M.R.]

Subp. 11a. **Complete directory.** “Complete directory” means a directory that includes the information compiled under part 78I 0.2900, subpart 1, whether printed, electronically published, or some combination thereof. For example, a complete directory may comprise of a printed subset of exchanges in a local calling area relevant to customers in a particular geographic area or community of interest and publication of the remainder of the local calling area either electronically or in separate printed volumes.

[For text of subps 12 to 26, see M.R.]

Subp. 26a. **Local service provider or LSP.** “Local service provider” or “LSP” means a telephone company or telecommunications carrier providing local service in Minnesota pursuant to a certificate of authority granted by the commission. Local service provider includes both local exchange carriers and competitive local exchange carriers.

[For text of subps 27 to 40, see M.R.]

#### 7810.2900 **FORMAT, CONTENT, AND DISTRIBUTION OF DIRECTORIES.**

Subpart 1. **Basic requirements.** ~~Telephone directories shall be regularly published, listing the name, address when practical, and telephone number of all customers, except public telephones and numbers unlisted at customer's request. The name of the telephone utility, the area included in the directory, the year and month of issue, shall appear on the front cover. Information pertaining to emergency calls such as for the police and fire departments shall appear conspicuously in the front part of the directory pages. The directory shall contain such instructions concerning placing local and long distance calls,~~

~~calls to repair and directory assistance services, and location of telephone company business offices as may be appropriate to the area served by the directory. Upon issuance, a copy of each directory shall be distributed to all customers served by that directory and a copy of each directory shall be furnished to the commission, upon request. Telephone directories shall be regularly compiled, and shall contain each customer's name, telephone number, and, if practical, address, except public telephones and numbers unlisted at the customer's request. Upon issuance, a local service provider shall provide to all customers served by that directory a complete directory consistent with the customer option provisions of part 7810.2950. Upon commission request, a local service provider shall furnish to the commission a copy of each directory issued, whether printed or electronic.~~

Subp. 2. **Printed directories.** Printed directories shall:

A. display on the front cover the name of the local service provider, the area included in the directory, and the year and month of issue;

B. display in the front portion of the directory information pertaining to emergency calls, including information for police and fire departments; and

C. contain instructions, appropriate to the area served by the directory, concerning placing local and long distance calls, calls to repair and directory assistance services, calls to local, state, and federal government offices, and the location of local service provider business offices.

Subp. 3. **Electronically published directories.** Any electronic directory a local service provider directs its customers to shall comply with subpart 1 and part 7810.2950.

Electronically published directories shall:

A. display the name of the local service provider;

B. display information pertaining to emergency calls, including information for police and fire departments;

C. display instructions concerning placing local and long distance calls, calls to repair and directory assistance services, calls to local, state, and federal government offices, and the location of local service provider business offices; and

D. be prominently displayed on and accessible from the company's Web site.

**7810.2950 DIRECTORIES; CUSTOMER OPTION.**

A local service provider may publish or arrange for publication of printed or electronic directories, or some combination thereof. A local service provider that does not make an electronic directory available shall distribute or arrange for distribution of a printed directory to each customer, except where an offer is made and explicitly refused by the customer. A local service provider that publishes an electronic directory shall provide, at least as often as print directories are issued, notice to customers of the availability of an electronic directory, instructions explaining how the electronic directory may be accessed, notice that a printed directory is available on request, and instructions explaining how to make a request for a printed directory. A local service provider that publishes an electronic directory must deliver a printed directory if requested by the customer. A local service provider shall not:

A. require customers to divulge any personally identifiable information, except name, ~~and~~ delivery address and phone number, in order to request a complete directory that is printed or contained on a portable physical electronic medium;

B. require users to create an account or log in, or otherwise provide any personally identifiable information in order to access an electronic directory;

C. obtain, use, or retain any personally identifiable information from customer use of or request for a directory, except for the limited purpose of providing a directory in the requested format; or

D. market services, including through its affiliate or publisher, other than directories to requesting customers.

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**7811.0630 CUSTOMER LISTINGS - NONDISCRIMINATION.**

A. If a local service provider wishes to list its customers' telephone numbers in the same directory as another local service provider, such local service provider must permit the listings on a nondiscriminatory basis.

B. Local service providers shall provide publishers and any other person or businesses with reasonable, nondiscriminatory access to subscriber listing information for the purpose of publishing telephone directories and all such information shall be provided at reasonable rates and subject to reasonable terms and conditions.

**7812.0630 CUSTOMER LISTINGS - NONDISCRIMINATION.**

A. If a local service provider wishes to list its customers' telephone numbers in the same directory as another local service provider, such local service provider must permit the listings on a nondiscriminatory basis.

B. Local service providers shall provide publishers and any other person or businesses with reasonable, nondiscriminatory access to subscriber listing information for the purpose of publishing telephone directories and all such information shall be provided at reasonable rates and subject to reasonable terms and conditions.

**7811.0600 BASIC LOCAL SERVICE REQUIREMENTS.**

Subpart 1. **Required services.** A local service provider (LSP) shall provide, as part of its local service offering, the following to all customers within its service area:

[For text of items A to E, see M.R.]

F. ~~one white pages complete directory per year for each local calling area, which may include more than one local calling area, except where an offer is made and explicitly refused by the customer consistent with the customer option provisions of part 7810.2950 and, upon a customer's request and in the customer's preferred format among the formats offered by the local service provider, one copy of any other directory within the local calling area;~~

[For text of items G to K, see M.R.]

**7812.0600 BASIC SERVICE REQUIREMENTS.**

Subpart 1. **Required services.** A local service provider (LSP) shall provide, as part of its local service offering, the following to all customers within its service area:

- A. single party voice-grade service and touch-tone capability;
- B. 911 or enhanced 911 access;
- C. 1 + intraLATA and interLATA presubscription and code-specific equal access to interexchange carriers subscribing to its switched access service;
- D. access to directory assistance, directory listings, and operator services;
- E. toll and information service-blocking capability without recurring monthly charges as provided in the commission's ORDER REGARDING LOCAL DISCONNECTION AND TOLL BLOCKING CHARGES, Docket No. P-999/CI-96-38 (June 4, 1996), and its ORDER GRANTING TIME EXTENSIONS AND CLARIFYING ONE PORTION OF PREVIOUS ORDER, Docket No. P-999/CI-96-38 (September 16, 1996), which are incorporated by reference, are not subject to frequent change, and are available through the statewide interlibrary loan system;

F. one ~~white pages complete~~ directory per year for each local calling area, which may include more than one local calling area, ~~except where an offer is made and explicitly refused by the customer~~ consistent with the customer option provisions of part 7810.2950 ~~and, upon a customer's request and in the customer's preferred format among the formats offered by the local service provider, one copy of any other directory within the local calling area;~~

G. a white pages and directory assistance listing, or, upon customer request, a private listing that allows the customer to have an unlisted or unpublished telephone number;

H. call-tracing capability according to chapter 7813;

I. blocking capability according to the commission's ORDER ESTABLISHING CONDITIONS FOR THE PROVISION OF CUSTOMER LOCAL AREA SIGNALING SERVICES, Docket No. P-999/CI-92-992 (June 17, 1993) and its ORDER AFTER RECONSIDERATION, Docket No. P-999/CI-92-992 (December 3, 1993), which are incorporated by reference, are not subject to frequent change, and are available through the statewide interlibrary loan system; and

J. telecommunications relay service capability or access necessary to comply with state and federal regulations.

[For text of subps 2 to 7, see M.R.]



## **CERTIFICATE OF SERVICE**

I, Valerie Mendoza, on behalf of the Minnesota Cable Communications Association 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:

### **COMMENTS IN THE MATTER OF POSSIBLE AMENDMENT TO RULES CONCERNING WHITE PAGES DIRECTORY PUBLICATION AND DISTRIBUTION**

(MPUC Docket No: P-999/R-13-459)

Dated this 19th day of February 2015

/s/Valerie Mendoza, Paralegal

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000  Owatonna, MN 55060	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Mark J.	Angell		Angell And Associates	1075 Rosewood Drive  Grapevine, TX 76051	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Deborah S.	Arnott		IG2, Inc.	5018 196th Street  Fresh Meadows, NY 113651319	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
David J.	Benke	david.j.benke@state.mn.us	MN Pollution Control Agency	520 Lafayette Road North  St. Paul, MN 55155	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Dirk	Berger	dberger@bevcomm.com	BEVCOMM Eckles Telephone Company	115 Main Street W.  New Prague, MN 56071	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
David	Bickett		Park Region Mutual Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Bickett		Valley Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Home Telephone Company	150 2nd St. SW  Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Birkholz	N/A	Mainstreet Communications, LLC	150 Second St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Melrose Telephone Company	150 Second St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Osakis Telephone	150 2nd St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Clements Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Nancy	Blankenhagen	nancyblankenhagen@nu-telcom.net	New Ulm Telecom Inc.	P.O. Box 697 27 N. Minnesota Street New Ulm, MN 560730697	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kathy	Boutwell	kathyb@chriscomco.net	Christensen Communications Co	104 Main Street West Madelia, MN 56062	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Tim	Brinkman	tim.brinkman@parkregion.com	Park Region Mutual Telephone Co.	100 Main Street PO Box 277 Underwood, MN 56586	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Diane	Browning	diane.c.browning@sprint.com	Sprint Corporation	KSOPHN0314-3A459 6450 Sprint Pkwy Overland Park, KS 66251	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Danny	Busche	dannyb@means.net	Minnesota Valley Telephone Company	318 Second Ave East P O Box 310 Franklin, MN 55333-0310	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Lance	Casey	lance.casey@consolidated.com	Consolidated Communications	N/A	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Scott	Cassel	N/A	Product Stewardship Institute, Inc.	29 Stanhope Street, Third Floor  Boston, MA 02116	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Regulatory	Contact	wci.regulatory@windstream.com	Windstream Communications, Inc.	600 Willowbrook Office Park  Fairport, NY 14450	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Rod	Cox	rod.cox@tdsmetro.com	TDS Metrocom	Suite 6000 525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Haleh	Davary	haleh.davary@verizon.com	Verizon	c/o VERIZON 201 Spear St FL 7 San Francisco, CA 94105	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Daryl	Ecker	daryl.ecker@parkregion.com	Park Region Mutual Telephone Co.	P.O. Box 277  Underwood, MN 56586	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Erickson		City Of Lakefield	301 Main Street PO Box 1023 Lakefield, MN 561500900	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Christianson	Farms			RR 2  Miltona, MN 56354	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Jeffrey	Feldman	jfeldman@everestv.com	FTTH Communications L.L.C.	c/o EveresTV Two Executive Drive, Ste 635 Fort Lee, NJ 07024	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Charles	Forst	charles.forst@zayo.com	Zayo Group, LLC	400 Centennial Pkwy Ste 200  Louisville, CO 80027	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Susan	Freeman		Network Operator Services, Inc.	P.O. Box 3529  Longview, TX 75606	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Paul	Fuglie		Verizon Select Services	HQE01H21 600 Hidden Ridge Irving, TX 75038	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Wayne	Gandy		Encompass Communications, LLC	Suite 286 119 West Tyler Street Longview, TX 75601	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Bill	Garcia	bill.garcia@windstream.com	Windstream	1800 Old Pecos Trail, Suite J  Santa Fe, NM 87505	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Shelly	Geerdes	sgeerdes@pinnaclepub.com	Pinnacle Publishing, LLC	4030 Technology Drive NW  Bemidji, MN 56601	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Edward H.	Griffin		US LEC Communications, Inc.	6801 Morrison Blvd.  Charlotte, NC 28211	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Donna	Gunderson		Johnson Telephone Company	205 1st Avenue NE PO Box 39 Remer, MN 56672	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mary	Haberek	mhaberek@ami.net	AMI Communications, Inc.	300 Cardinal Drive, Suite 280  St. Charles, IL 60175	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Robert L.	Hammond, Jr.	N/A	BEVCOMM, Inc.	123 W 7th St  Blue Earth, MN 56013-1309	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
JoAnn	Hanson	joann.hanson@centurylink.com	CenturyLink	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Bruce	Hanson	N/A	Zumbrota Telephone Company	1700 Technology Dr Ste 100  Willmar, MN 56201	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
William	Heaston	bill.heaston@sdcncommunications.com	PrairieWave Telecommunications, Inc.	2900 W. 10th Street  Sioux Falls, SD 57104	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Ted	Heckmann	ted.Heckmann@cinbell.com	Cincinnati Bell Any Distance, Inc.	P.O. Box 2301 221 E. Fourth Street, 1280 Cincinnati, OH 45201-2301	Electronic Service 03-	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jerry	Heiberger	jerry.heiberger@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Andy	Hennis	andyh@chriscomco.net	Christensen Communications Company	104 West Main Street Madelia, MN 56062	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Scott	Hoffmann	hoffmann@wins.net	Wisconsin Independent Network, LLC	Box 107 800 Wisconsin Street Eau Claire, WI 547033612	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Paul	Hoge	phoge@crosslake.net	Crosslake Communications	35910 County Road 66 PO Box 70 Crosslake, MN 56442	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Pamela	Hollick	Pamela.Hollick@Level3.com	Level 3 Communications, LLC	4625 W. 86th Street Suite 500 Indianapolis, IN 46268	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kevin	Hopkins	khopkins@telephoneassociates.com	Telephone Associates, Inc.	329 Grand Ave Superior, WI 54880	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Rich	Horner		Guaranteed Phone Service	#1 2201 West Broadway Council Bluffs, IA 51501	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Marja	Johnson	lisa@icom.net	Coast International Inc.	14303 West 95TH Street Lenexa, KS 66215	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St  Albany, MN 56307-8322	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street  Lake Mills, IA 50450	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kevin	Larson	klarson@ctctelcom.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Larry	Laskowski		Network Billing Systems	155 Willowbrook Blvd  Wayne, NJ 7470	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
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	No	OFF_SL_13-459_R-13-459 Service List
Mary	Lohnes	mary_lohnes@mimi.net	Midcontinent Communications	3901 N Louise Ave  Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Bill	Loonan		Lismore Coop. Telephone Co.	PO Box 127  Lismore, MN 56155	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Gregory	Ludvigsen	gregoryludvigsen@live.com	Ludvigsen's Law Offices	1360 University Ave. W., Suite 104 PMB 120 St. Paul, MN 55104-4092	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
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_13-459_R-13-459 Service List
Lee	Maier	lee@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Mancuso	jmanuso@clearworld.net	Clear World Communications	3501 South Harbor Blvd. Suite 200 Santa Ana, CA 92704	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Thomas	Margavio	tm5886@att.com	BellSouth Long Distance, Inc.	AT&T Midtown Center 675 W Peachtree Ste 17E21 Atlanta, GA 30375	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Francie	McComb		Talk America, Inc.	2134 W. Laburnum Ave.  Richmond, VA 232274342	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Anthony	Mendoza	tony@mendozalawoffice.com	Mendoza Law Office, LLC	790 S. Cleveland Ave. Suite 206 St. Paul, MN 55116	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Shelby	Michlin		Network Billing Systems, LLC	155 Willowbrook Blvd.  Wayne, NJ 7470	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Monty	Morrow	montymorrow@nu-telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
David	Nelson	davidnelson@kpcoop.com	Kandiyohi Power Cooperative	P.O. Box 40 8605 47th Street NE Spicer, MN 562880040	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Michael	Nelson	Michael_Nelson@cable.comcast.com	Comcast Corp.	183 Inverness Drive West  Englewood, CO 80112	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Daniel C.	Nelson	dcndtc@bevcomm.net	Dunnell Telephone Company, Inc.	PO Box 42 110 N Seeley Ave Dunnell, MN 56127	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Financial	Officer		Emily Cooperative Telephone Company	P.O. Box 100  Emily, MN 564470100	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

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	OFF_SL_13-459_R-13-459 Service List
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road  Madison, WI 53717	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Gloria	Pederson	gpederson@bevcomm.com	Cannon Valley Telephone, Inc.	123 West Seventh Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Rochelle	Pervisky	RPervisky@exchange.hbci.com	Hiawatha Broadband	58 Johnson Street  Winona, MN 55987	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive  Burnsville, MN 55306	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300  Las Vegas, NV 89119-3514	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25  Wawina, MN 557369721	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Judith A	Riley	jriley@telecompliance.net	Mosaic Networx LLC dba MX NETWORK	PO Box 720128  Oklahoma City, OK 73172-0128	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Carey	Roesel	croesel@tminc.com	Technologies Management, Inc.	PO Drawer 200  Winter Park, FL 327900200	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Steve	Roussos	N/A	Convergia, Inc.	237 Hymns Blvd  Pointe Claire, Quebec H9R 5C7  CANADA	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marc	Rozar		Custom Network Solutions, Inc.	Suite 102 210 E Route 4 Paramus, NJ 76525103	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Jill	Sandford	jill.sandford@zayo.com	Zayo Group, LLC	400 Centennial Pkwy Ste 200  Louisville, CO 80027-1210	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW  Rice, MN 56367	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Jeff	Schill	jeff.schill@netins.com	Iowa Network Services Inc	4201 Corporate Drive  West Des Moines, Iowa 50266	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
David	Schornack	N/A	The Peoples Telephone Company of Bigfork	150 2nd St. SW  Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Schornack	N/A	Arrowhead Communications Corporation	150 Second Street SW  Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Schornack	N/A	Loretel Systems, Inc.	150 Second Street SW  Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Schornack	N/A	Felton Telephone Company	150 Second Street SW  Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Schornack	N/A	East Otter Tail Telephone Company	150 2nd Street SW  Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Don	Snyders	don@alliancecom.net	Alliance Communications Cooperative, Inc.	PO Box 349 612 Third St Garretson, SD 57030	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lance J.M.	Steinhart	info@telecomcounsel.com	Attorney at Law	1725 Windward Concourse Ste 150  Alpharetta, GA 30005	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kate	Stem	BADEMAILkate.stem@accesspointinc.com	Access Point, Inc.	1100 Crescent Green, Ste. 109  Cary, NC 27518	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Paul	Stowman	paul@rothsay.us	Rothsay Telephone Company	PO Box 158 137 1st St NW Rothsay, MN 56579-0158	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East CedarP.O. Box 360  Houston, MN 559430360	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Mike	Theisen		Northern Minnesota Utilities	910 Cloquet Ave.  Cloquet, MN 55720	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St  Lake Mills, IA 50450	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Carl	Thompson		PromiseVision Technology, Inc.	#212 1050 E 2nd Edmond, OK 73034	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Patricia	Voorhees	regulatory@matrixbt.com	Touch 1 Communications, Inc.	7171 Forest Lane suite 700  Dallas, TX 75230	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dana	Wahlberg	dana.wahlberg@state.mn.us	Department of Public Safety	Town Square Ste 137 444 Cedar St St. Paul, MN 551015126	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Jerry	Watts	jerry.watts@elnk.com	EarthLink	3000 Columbia House Blvd Ste 106  Vancouver, WA 98661	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Avi	Weisman		Gold Line Telemanagement Inc.	180 West Beaver Creek Rd  Richmond Hill, ON L4B 1B4  CANADA	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Sandra	Williams	sandrawilliams@netoneint.com	Net One International, Inc.	6933 University Blvd.  Winter Park, FL 32792-6707	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Lyle R.	Williamson	N/A	Verizon Wireless	8350 E Crescent Pkwy Ste 200  Greenwood Village, CO 80111	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
David	Wolf	dwolf@gctel.net	Gardonville Cooperative Telephone Association	800 Central Ave N  Brandon, MN 56315	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List