

April 7, 2020

Will Seuffert
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 In The Matter Of The Fond du Lac Communications, Inc., Request for the Minnesota Public Utilities Commission to Defer Designation as an Eligible Telecommunications Carrier to the Federal Communications Commission
Docket No. P7029/M-20-386

Dear Mr. Seuffert:

The Department of Commerce (Department) has reviewed the petition and the supplement to the petition of the Fond du Lac Communications, Inc. (FDLCI) to the Federal Communications Commission (FCC), along with the Staff Briefing Papers. The Department concurs with Staff's recommended decision to accept FDLCI's request to provide FDLCI's counsel written confirmation that the Commission defers to the FCC to make the ETC determination.¹

The Department also agrees with Staff's findings that any request for ETC status beyond the boundaries of the reservation are de minimus. In the future, if FDLCI wishes to expand its services beyond the reservation, the Commission may wish to participate in the request for expansion.

Sincerely,

/s/ JOY GULLIKSON
Telecommunications Analyst

/s/ LISA GONZALEZ
Telecommunications Analyst

JG/LG/ja

¹ Paraphrased from Staff Briefing Papers, page 6.

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. P7029/M-20-386

Dated this **7th** day of **April 2020**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_20-386_Official
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_20-386_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-386_Official
Brad	Deutsch	brad.deutsch@foster.com	Foster Garvey PC	1000 Potomac St. NW, Suite 200 Washington, DC 20007	Electronic Service	No	OFF_SL_20-386_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-386_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-386_Official
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-386_Official