

October 24, 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. P421/AM-14-775

Dear Dr. Haar:

Attached are the Comments of the Minnesota Department of Commerce in the following matter:

In the Matter of the Petition of Qwest Corporation d/b/a CenturyLink QC and Dex Media East, Inc. for a Variance of 7810.2900 and 7812.0600 Regarding the Distribution of Printed Residential White Pages Directories to All Customers in the Territory and Exchanges Served by Qwest Corporation dba CenturyLink QC in the State of Minnesota.

The petition was filed on September 11, 2014 by:

Gregory A. Ludvigsen
Attorney at Law
Ludvigsen's Law Offices
1360 University Avenue West, Suite 104 PMB 120
St. Paul, MN 55104-4092

The Department is available to address any questions that arise.

Sincerely,

/s/ DIANE DIETZ
Rates Analyst

/s/ KATHERINE DOHERTY
Rates Analyst

DD/KD/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. P421/AM-14-775

I. PROCEDURAL BACKGROUND

On September 11, 2014, Qwest Corporation d/b/a CenturyLink (CenturyLink QC) and Dex Media East, Inc. (Dex Media) (collectively, the Joint Petitioners or the Petitioners) filed a petition requesting that the Minnesota Public Utilities Commission (Commission) grant CenturyLink QC and Dex Media a variance waiving the provisions of Minnesota Rules 7810.2900 and 7812.0600 that require the distribution of a printed residential white pages directory to all customers served by CenturyLink QC¹ in Minnesota.

The Joint Petitioners request a variance of portions of Minn. R. 7810.2900 and 7812.0600 in order to “provide a printed residential white pages directory to the customers of CenturyLink and competitive providers only upon request and at no charge by [the] Petitioners, subject to appropriate notice and other requirements such as some or all of the conditions approved in the Frontier Order.”²

The request is limited to “CenturyLink’s Minneapolis/St. Paul service areas,”³ specifically (according to the Petition) “the areas covered by Dex Media’s Minneapolis and St. Paul directories which generally encompass the local calling areas of those cities.”⁴ In response to the Department’s question, the Joint Petitioners clarified that the specific directories affected by the petition, if granted, would be Minneapolis, Northwestern Suburban, Western Suburban, St. Paul, Forest Lake Area, St. Croix Valley, White Bear Lake Area, South Metro, and Southeast St. Paul Suburbs.

¹ The Joint Petitioners refer to Qwest Corporation d/b/a Century Link throughout the petition as “CenturyLink.” While Dex Media also has contracts with other CenturyLink entities for the publishing and distribution of white pages directories, this petition is specific to the territory served by Qwest Corporation dba CenturyLink. To avoid confusion, the Department refers to Qwest Corporation dba CenturyLink as “CenturyLink QC” throughout this document. When referring to all Minnesota CenturyLink companies, including Embarq Minnesota and the CenturyTel Companies, the Department refers to the entity as “CenturyLink.”

² Petition, page 5.

³ *Id.*

⁴ *Id.*, footnote 2.

The Petitioners request that the variance be granted for a period of two years from the date of the Commission's Order or until the Directory Rules are amended, whichever is earlier.

The Joint Petitioners propose that if the Commission grants the requested variance, the petitioners will distribute printed residential directories free of charge to all households who request one, noting that in addition to the households with customers served by CenturyLink QC and the CLECs that operate within CenturyLink QC's service area, households with customers who have no wireline phone service will be provided a printed white pages directory upon request.⁵

Dex Media will continue the saturation delivery of printed directories that include emergency information, business and government white pages, yellow pages, consumer guide pages and other required informational material to all customers.

II. RECENT REQUESTS FOR VARIANCES OF RULES 7811.0600, 7812.0600 AND 7810.2900

A. FRONTIER/CITIZENS REQUEST

On June 27, 2012, in Docket No. P405,407/AM-12-140,⁶ the Commission granted a variance of Minnesota Rule 7810.2900 and Minnesota Rules 7811.0600 and 7812.0600 subparts 1(F) and (G) (requiring the provision and distribution of white page directories to all customers within the applicable service area) to Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC (collectively Frontier), and extended the variance at the specific request of other certified local service providers, to all competitive local service providers operating in Frontier's service area who were also subject to the rules.

The Commission found that the standards for granting a variance had been met in that case, noting that:

1. Enforcement of the rule would impose unnecessary cost burdens on the company, and that customers who do not wish to receive the printed residential directory would be burdened with the disposal of the print copy;
2. Varying the residential directory distribution requirements of the rule would not adversely affect the public interest. The purpose of the rule is to ensure that customers receive the residential directory and the Company will adequately protect a customer's right to a printed copy of the residential directory by

⁵ Petition, page 19.

⁶ In the Matter of a Petition of Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC for a Variance of Rule 7810.2900 Regarding the Distribution of Telephone Directories, Docket No. P-405,407/AM-12-140, *ORDER GRANTING VARIANCE WITH RESTRICTIONS*, June 27, 2012. (Frontier Order).

3. providing one on request of the customer. The directory is also available online for all Frontier customers; and
4. A variance in this case will not conflict with standards imposed by law. The Commission is authorized to vary its rules.⁷

The Commission thus granted a variance of the rules to Frontier and competitive local exchange carriers operating within Frontier territory, subject to the following conditions:⁸

- a. Frontier shall provide a printed residential white pages directory to the customers of competitive providers upon request and at no charge by Frontier.
- b. Frontier shall inform CLECs of any plans to stop distributing residential white pages in the future as the change is implemented throughout Frontier's service territory in Minnesota.
- c. Frontier shall accept electronic files from competitive providers identifying customers that request a residential white pages directory and Frontier may establish the process for exchange of electronic files by amending interconnection agreements, if necessary.
- d. Frontier shall state on the protective wrap of the business and government directory that customers can request a printed copy of residential white pages. The Company shall also include a notification card and bill notice indicating the same information.
- e. Frontier shall notify Frontier customers in south metro exchanges that residential white pages were not included in the business and government telephone directory and that customers may request the residential white pages. The following notification language shall be provided to Frontier customers:

Residential White Pages were not included in the telephone directory recently distributed to you. The Residential White Pages are now online at www.FrontierPages.com. To order directories, stop delivery of this directory or obtain a free copy of the Residential White Pages, call 1-8XX-XXX-XXXX.

- f. Frontier shall print the following message on the cover of the telephone directory:

Residential White Pages are not included in this directory. The Residential White Pages are now online at www.FrontierPages.com. To order directories, stop delivery of

⁷ Frontier Order, page 4.

⁸ Minn. Rule 7829.3200, subp. 2 permits the Commission to grant a variance conditioned upon compliance with conditions imposed by the Commission.

this directory or obtain a free copy of the Residential White Pages, call 1-8XX-XXX-XXXX.

A variance automatically expires in one year unless the Commission orders otherwise. The Commission elected to extend the variance for a period of three years.⁹

B. DEX MEDIA EAST, INC.'S 2012 REQUEST

On November 12, 2012, in Docket No. P421/AM-12-1236, Dex Media filed a petition requesting that the Commission grant CenturyLink QC and Dex Media a variance waiving the provisions of Rule 7810.2900 and Rule 7812.0600 that require the distribution of a printed residential white pages directory to all customers served by CenturyLink QC in the State of Minnesota.

Notably, CenturyLink QC opposed Dex Media's November 12, 2012 petition, stating that while Dex Media purported to seek a waiver on behalf of itself *and* CenturyLink QC, CenturyLink QC did not participate in the petition. CenturyLink argued that 1) Dex Media had not demonstrated that its proposed waiver is in the public interest, and 2) that Dex Media's concerns should be addressed in a rulemaking or at a minimum after a contested case proceeding.

In considering Dex Media's request, the Commission reasoned that since Dex Media is not a telephone company, "its obligation to comply with the Minn. R. 7810.2900 and Minn. R. 7812.0600 arises only by virtue of its contract with CenturyLink, a telephone company authorized to provide service in Minnesota and which must comply with the Commission's rules."¹⁰ Further, the Commission noted that "while Dex has standing to seek a variance, as anyone affected by a rule may, it is appropriate to attach greater weight to the judgment of the regulated entity whose obligation the third-party contractor seeks to vary."

Accordingly, the Commission denied Dex Media's requested variance and opened a rulemaking proceeding to examine the need for saturation distribution of white pages directories on a statewide basis.

C. THE COMMISSION'S DIRECTORY RULEMAKING PROCEEDING

On October 11, 2013, in Docket P999/RM-13-459,¹¹ the Commission issued initial "working draft rules" and a notice soliciting comments on an initial "working" draft, on possible revisions to the directory rules in Minnesota Rules 7810, 7811, and 7812. The Commission sought input on whether to modify or eliminate the directory requirement and whether to allow or require electronic publication of directories."

⁹ Frontier Order, page 5, Ordering Paragraph 2.

¹⁰ Dex Media Order, page 3.

¹¹ In the Matter of Possible Rule Amendments Concerning White Pages Publication and Distribution, Docket No. P999/RM-13-459.

On June 10, 2014, the Commission sought additional comments and reply comments on a revised draft.

On October 16, 2014, the Commission met and approved final draft rules as proposed by Commission staff, with minor modifications.¹²

The final draft rules eliminate the requirement that white page *printed* directories be distributed to all customers within a local service provider's service area, and allow, but do not require, directories to be published electronically, as well as in printed form.

Local service providers are required to provide (or make available) to all customers served by a directory, a "complete" directory¹³ whether printed, electronically published, or some combination thereof. A local service provider that publishes an electronic directory must deliver a printed directory upon a customer's request.

The rules also establish specific conditions designed to ensure consumer privacy when requesting or accessing a directory.

III. STATEMENT OF ISSUES

1. Are the Joint Petitioners suffering an excessive burden if the rule is enforced?
2. Would the public interest be advanced by granting the rule variance?
3. Would granting the variance conflict with standards imposed by a statute?
4. If the Commission determines that the requested variance should be granted, what, if any, conditions are appropriate?

IV. LEGAL REFERENCES

Minn. Rule 7829.3200, entitled "Other Variances" states:

Subpart 1. When granted. The commission shall grant a variance to its rules when it determines that the following requirements are met:

- A. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;

¹² At the time of this writing, the Commission's order has not yet been released. Attached as DOC-ATT.1 is copy of the final draft rules reflected in Commission staff briefing papers filed on October 7 and October 15, 2014.

¹³ A "Complete Directory" as defined in the draft rules may be printed, electronically published, or some combination thereof. A Complete Directory must include each customer's name, telephone number, and if practical, address, except public telephones and numbers unlisted at the customer's request.

B. Granting the variance would not adversely affect the public interest; and

C. Granting the variance would not conflict with standards imposed by law.

Subp. 2. Conditions. A variance may be granted contingent upon compliance with conditions imposed by the commission.

Subp. 3. Duration. Unless the commission orders otherwise, variances automatically expire in one year. They may be revoked sooner due to changes in circumstances or due to failure to comply with requirements imposed as a condition of receiving a variance.

Minn. Rule 7812.0600, subpart 1 states that:

A local service provider (LSP) shall provide, as part of its local service offering, the following to all customers within its service area:

One white pages 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.

Minn. Rule 7810.2900 addresses the content of directories and requires that:

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.

V. ANALYSIS

A. THE STANDARDS FOR GRANTING A VARIANCE

Whether to grant the requested variance is regulated by Commission Rule 7829.3200. The Commission may grant the variance if 1) enforcement of the rule imposes an “excessive” burden upon the applicant or others affected by the rule, 2) granting the variance would not adversely affect the public interest, and 3) granting the variance does not conflict with other law.¹⁴ In addition, a variance may be granted contingent upon compliance with conditions imposed by the Commission.¹⁵

- *The Joint Petitioners have provided information to demonstrate that the rule imposes an “excessive” burden.*

The Petitioners state that:

The current requirement that CenturyLink (and therefore Dex Media) deliver a printed white pages directory to each customer of CenturyLink results in an excessive burden on Petitioners. Because of the changes in customer behavior and needs, Dex Media is forced to print and deliver hundreds of thousands of directories, at significant cost, to customers that no longer use or want them. The members of the public no longer use or want the residential white pages and find the massive waste of resources to produce recycled paper and publish and distribute to themselves and countless similarly situated customers of CenturyLink to be disturbing and even upsetting.

The application of the Directory Rules to Petitioners also results in excessive burden in relation to competition. Dex Media has competitors in the directory business, including Yellowbook in the Twin Cities. Yellowbook is not affiliated with CenturyLink or any other LEC and accordingly is free to print and distribute only business directories, which generate all the revenues for a directory publisher. Because Yellowbook does not have to print and distribute residential white pages, Dex Media bears a significant and excessive cost burden relative to Dex Media’s competitors.¹⁶

The Petitioners also point out the environmental impact of unused white page directories, noting that “the public’s environmental sensitivities have increased significantly in recent years,”¹⁷ and estimating that “95% or more of consumers are likely to be concerned or even

¹⁴ Minn. Rules Part 7829.3200, subp. 1.

¹⁵ Minn. Rules Part 7829.3200, subp. 2.

¹⁶ Petition, page 10.

¹⁷ Petition, page 15.

irritated by receiving a book that they do not need or value and will not use even once before they discard it.”¹⁸

The Department believes that sufficient evidence has been provided for the Commission to conclude that enforcement of the rule imposes a cost burden not only on the petitioners, but on the public as well.

- *The variance, if granted, does not conflict with statutory standards.*

The Department is not aware of any statutory standards with which the requested variance, if granted, would conflict.

- *Granting the variance, with appropriate conditions, would not adversely affect the public interest.*

The Joint Petitioners have provided examples of Dex Media’s successful transitions to “upon request” delivery of white pages directories in other locations, including Phoenix, Tucson, Denver, Omaha, Albuquerque, Portland, Salt Lake City, and Seattle, as well as examples of successful implementations of “upon request” delivery by other providers. The Petitioners also point out that “Frontier now has over two years of experience with upon request delivery and reports a request rate of under 1% in this state.”¹⁹

The Joint Petitioners state that printed residential white pages will continue to be available to those customers who request one, and have committed to continue the saturation delivery of printed directories that include emergency information, consumer guide pages and other required informational material to all customers.

In the Frontier case, the Commission determined that a variance of the rule was appropriate and was persuaded at least in part by arguments that technological advances, such as Internet directories and the directories in wireless and wireline devices, have made customers much less reliant on, and much less interested in, printed residential white page directories. The Commission stated that “the Company will adequately protect a customer’s right to a printed copy of the residential directory by providing one on request of the customer,” noting that, “*the directory is also available online for all Frontier customers.*”²⁰(Emphasis added).

¹⁸ *Id.*

¹⁹ Petition page 9. Frontier stated in its July 31, 2014 comments in Docket P999 (13-459) that “Frontier has taken advantage of the waiver in certain areas of its Minnesota service territory. Under the waiver, in those areas Frontier delivered printed directories to all its customers that contained a business white page directory and Yellow Pages, as well as information regarding emergency services and other informational material. Frontier also notified all its customers in those areas that a printed residential white page directory was available for the asking. The customer response to that offer was instructive: less than 1% of customers asked for a printed residential white page directory.” (Emphasis added.)

²⁰ Frontier Order, page 4.

While the Petitioners state, in support of their request, that “consumers looking for residential telephone numbers can now easily find them on the Internet,”²¹ CenturyLink QC, as a local service provider subject to the jurisdiction of the Commission, makes no specific commitment to provide or maintain an electronic white pages directory for those areas for which the variance is sought.

It is important to note that the Commission’s recently approved draft directory rules, do not eliminate the requirement that local service providers provide or make available to customers one “complete”²² directory per year, whether printed, electronically published, or some combination thereof.

The Department recommends that, in order to ensure consistency with the public interest, the terms of the Frontier Order, and the Commission’s final draft directory rules, CenturyLink QC be required to make available on its website an electronic white pages directory or directories for the areas served by the Minneapolis, Northwestern Suburban, Western Suburban, St. Paul, Forest Lake Area, St. Croix Valley, White Bear Lake Area, South Metro, and Southeast St. Paul Suburbs directories.

B. IF THE COMMISSION DETERMINES THAT THE REQUESTED VARIANCE SHOULD BE GRANTED, WHAT, IF ANY, CONDITIONS ARE APPROPRIATE?

The Department notes that Dex Media is not a local service provider subject to the jurisdiction of the Commission, but is instead obligated as a directory publisher and distributor only through its contractual relationship with CenturyLink QC. The Department therefore recommends that, if the Commission finds that the variance should be granted, any applicable conditions be placed on CenturyLink QC.

The Department recommends the following conditions:

- A. CenturyLink QC shall provide (or direct its directory publisher to provide) a printed residential white pages directory to the customers of CenturyLink QC and the customers of CenturyLink QC’s competitive providers upon request and at no charge by CenturyLink QC or Dex Media.
- B. CenturyLink QC shall continue, or shall direct that its directory publisher continue, the saturation delivery of printed directories that include emergency

²¹ The Petitioners provide as examples on page 12, DexKnows.com and DexMobile where customers can search for listings, and DexPages.com, where customers may access replicas of traditional print directories. The Department notes that Dex Media, who maintains these sites, is not a local service provider subject to the jurisdiction of the Commission, but is instead obligated as a directory publisher only through its contractual relationship with CenturyLink QC.

²² The Commission’s draft rules define “Complete directory” as “a directory that includes the information compiled under Rule 7810.2900 subpart 1, whether printed, electronically published, or some combination thereof.” Draft Rule 7810.2900 subpart 1 requires that directories contain each customer’s name, telephone number and if practical, address, except that they shall not contain numbers that are not listed at the customer’s request.

- C. information, business and government white page, consumer guide pages and other required informational pages.
- D. CenturyLink QC shall make electronic white page residential directories for Minneapolis, Northwestern Suburban, Western Suburban, St. Paul, Forest Lake Area, St. Croix Valley, White Bear Lake Area, South Metro, and Southeast St. Paul Suburbs available on its website.
- E. CenturyLink QC shall notify affected customers in the areas covered by the Minneapolis, Northwestern Suburban, Western Suburban, St. Paul, Forest Lake Area, St. Croix Valley, White Bear Lake Area, South Metro, and Southeast St. Paul Suburbs directories that residential white pages are not included in the business and government telephone directories for those areas, and that customers may request the residential white pages. The notice shall provide a toll free number which customers may call to request residential white pages directories, and shall direct customers to CenturyLink QC's website where the residential white pages may be accessed.
- F. CenturyLink QC shall state (or direct that its directory publisher state) on the delivery bag of the business and government telephone directory that customers can request a printed copy of the residential white pages. The message shall provide a toll free number which customers may call to request residential white pages directories, and shall direct customers to CenturyLink QC's website where the residential white pages may be accessed.
- G. CenturyLink QC shall not market services, including through its affiliate or publisher, other than directories to such requesting customers.
- H. CenturyLink QC shall not require, nor shall it permit its directory publisher to require, customers to divulge any personally identifiable information other than their name and delivery address in order to request a printed residential white pages directory.
- I. CenturyLink QC shall not require (and shall direct that its directory publisher not require) users to create an account, log in, or otherwise provide any personally identifiable information in order to access any electronic directory to which CenturyLink QC directs its customers.

VI. COMMISSION ALTERNATIVES

1. Grant the requested variance without conditions
2. Deny the variance

3. Grant the variance subject to some or all of the above conditions.
4. Grant the variance subject to other conditions of the Commission's choosing.

VII. DEPARTMENT RECOMMENDATION

The Department recommends Alternative 3. The Commission should grant the requested variance subject to conditions A through H, listed above.

/lt

Minnesota Public Utilities Commission
Staff Briefing Papers

Meeting Date: October 16, 2014.....*Agenda Item # 2

Company: **All Utilities**

Docket No. **P-999/R-13-459**

In the Matter of Possible Amendments to Rules Concerning White Pages
Directory Publication and Distribution

Issue(s): A. Are rule amendments needed and, if so, what amendments?

B. How should the rulemaking proceed?

Staff: Christopher Moseng.....651-201-2223

I. Relevant Documents

Request for Comments published in the *State Register*October 14, 2013
Comments, Minnesota Pollution Control Agency December 5, 2013
Comments, Minnesota Cable Communications Association..... December 6, 2013
Comments, Pinnacle Publishing, LLC..... December 6, 2013
Comments, Product Stewardship Institute..... December 6, 2013
Comments, CenturyLink December 6, 2013
Comments, Citizens Telecommunications Company of Minnesota, LLC
and Frontier Communications of Minnesota, Inc. December 6, 2013
Comments, Minnesota Telecom Alliance..... December 6, 2013
Comments, Dex Media East, Inc. December 6, 2013
Comments, Minnesota Department of Commerce..... December 6, 2013
Notice of Comment Period on Revised Draft June 10, 2014
Notice of Extension of Comment Period..... June 27, 2014
Comments, Minnesota Department of Commerce..... July 1, 2014
Comments, Minnesota Cable Communications Association..... July 31, 2014
Comments, Minnesota Telecom Alliance..... July 31, 2014
Comments, CenturyLink..... July 31, 2014
Comments, Dex Media East, Inc. July 31, 2014

Comments, Citizens Telecommunications Company of Minnesota, LLC and Frontier Communications of Minnesota, Inc.	July 31, 2014
Reply Comments, Citizens Telecommunications Company of Minnesota, LLC and Frontier Communications of Minnesota, Inc.	August 11, 2014
Reply Comments, Minnesota Cable Communications Association	August 11, 2014
Reply Comments, Dex Media East, Inc.	August 12, 2014

The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing loss or speech disabilities may call us through their preferred Telecommunications Relay Service.

II. Statement of the Issues

Should the Commission publish a Notice of Intent to Adopt Rules and, if so, what rule language should be included with the notice?

III. Background

Commission rules currently require delivery of a printed white pages directory to each customer of a local service provider, except where an offer for a directory is made and explicitly refused by the customer.¹ Recently, parties have requested that the Commission vary this rule, in part because the economic and environmental burden of requiring printed directories may outweigh the directories' usefulness.

The Commission published a Request for Comments on possible rule revisions in the State Register on October 14, 2013, and sought additional comments on a revised draft on June 10, 2014. The Commission sought input on whether to modify or eliminate the directory requirement. In the initial request for comments, the Commission stated that:

[it] is likely to consider modifying or eliminating the requirement that local service providers deliver printed directories, and also consider allowing or requiring electronic publication of directories.

In an effort to focus the comments to maximize their usefulness for evaluating the directory rules, the Commission included a draft of possible rule language. The Commission asked participants to respond with the following considerations in mind:

- the expense, materials, effort, and environmental consequences of distributing printed directories;
- the effect on customers who may prefer to receive printed directories, and on customers who may prefer to receive electronic directories;
- the privacy issues that may arise from electronic publication of directory information;
- the economic effects, including identifying any other federal or state regulations that may have a cumulative effect;
- any other issue the Commission should consider.

After receiving and considering the initial public comments, staff revised the draft and solicited a second round of comments and reply comments. Staff revised the draft again in light of those additional comments.

The staff-recommended draft is attached as Appendix A to these briefing papers.

¹ Minn. R. 7810.2900, 7811.0600, and 7812.0600.

IV. Summary of Staff-Recommended Draft

At the outset of this rulemaking proceeding, staff developed a draft rule anticipating some of the likely competing interests at play regarding telephone directory distribution rules. Comments in this docket suggest that even among local service providers, and among customers, there is not complete agreement about the value, need for, or reasonableness of printed or electronic directories. The list of considerations posed to commenters (expense, environmental consequences, customer preference, privacy, and economic effects) also informed staff's initial rule draft.

Whether to continue to require telephone directories as a basic service requirement is a threshold policy determination for the Commission. Some comments recommend eliminating the requirement entirely. Implicit in the recommended draft is the premise that telephone directories will remain a basic service requirement. Staff approached the drafting process with this assumption, in the absence of contrary guidance from the Commission, to develop a draft reasonably suited for an environment where that basic requirement would remain in place.

Assuming that the Commission intends to continue to require directories as a basic aspect of telephone service, the draft constitutes an incremental step away from printed directories and toward electronic directories.

The draft allows Local Service Providers to determine whether they will offer electronic directories in lieu of printed directories, but ensures that individual customers may elect to receive printed directories if that is their preference. The draft also allows Local Service Providers *not* to publish electronic directories and to continue to deliver printed directories consistent with the status quo. Finally, in cases where an electronic directory is the Local Service Provider's default option, the draft requires notice to customers to ensure they know how to access or receive their preferred directory format.

The staff recommends this flexibility to balance the diverse interests of local service providers, customers, and the public. Some local service providers and some customers believe printed directories are useful and necessary. Others do not. Others still consider them more harmful than beneficial. Staff's proposed resolution is to allow for more flexibility in the publication of directories, facilitating a transition away from print and toward electronic directories.

V. Participants' Comments

The Commission received comments from a total of nine participants over two comment periods. All participants agreed with the premise that revising the rule at this time is reasonable and necessary, but not all agreed about the extent and the nature of the needed change.

Three participants commented only during the initial comment period. Their comments are summarized first. Six participants submitted comments in both rounds of comments—three now support the staff-recommended approach, and three recommend changes. For the six participants

commenting in both rounds, these briefing papers will focus primarily on comments made in the most recent comment period.

Dex, Citizens, Frontier, and the Minnesota Cable Communications Association also filed reply comments in the second round. Their positions with respect to other commenters' positions are noted in Section C, below.

A. Comments from Participants Who Commented Only in the First Round

These participants responded to the initial Request for Comments, but did not offer comments on the most recent draft: The Minnesota Pollution Control Agency (MPCA), Pinnacle Publishing, LLC, and Product Stewardship Institute (PSI).

1. Minnesota Pollution Control Agency

The Minnesota Pollution Control Agency commented “in full support of eliminating the requirement that the white pages directories must be delivered in a paper publication,” and in support of a rule that would require electronic directories except where a customer expressly elects to receive a printed directory. The MPCA stated that the PUC should require that electronic directories be the default directory format.

In support of its position, the MPCA pointed to negative environmental consequences of mandatory distribution of printed directories, including the consumption of resources and the creation of “CO₂ equivalent,” particulate matter, and volatile organic compounds. The MPCA also stated that notwithstanding state statutory requirements that phonebooks not be placed in the solid waste stream, the EPA estimated that in 2009 less than 37% of phonebooks were properly recycled. According to the MPCA, counties are bearing the burden and cost of recycling telephone directories.

Finally, the MPCA argued that even with electronic directories, customers should still receive emergency and government phone numbers in a paper form to ensure all customers have access to this information.

2. Product Stewardship Institute

The Product Stewardship Institute similarly argued that the mandatory distribution of white pages is no longer necessary, and that it should be discontinued except for individual customers who expressly elect to receive one. PSI cited resource consumption, release of CO₂ equivalent, and the expense of collection and recycling.

3. Pinnacle Publishing, LLC

Pinnacle Publishing commented to support electronic directories being an option for local service providers, but opposed making electronic directories mandatory and opposed an “opt-in” rule that would allow directory distribution only to those who have expressly requested one. Pinnacle argued that, besides having a First Amendment interest in distributing directories, selective

delivery of directories would be cost prohibitive using common directory distribution methods (bulk mail or hand delivery).

B. Comments Supporting the Staff's Recommended Draft

CenturyLink, Dex Media East, Inc. (Dex), Citizens Telecommunications Company of Minnesota, LLC, and Frontier Communications of Minnesota, Inc. stated in the most recent round of comments that they support the Staff's Recommended Draft. In their initial comments, these participants cited low demand for directories and a changed business and information environment as justification to revise the existing rule.

C. Comments Recommending Changes to the Draft

The Minnesota Department of Commerce (the Department), The Minnesota Cable Communications Association (MCCA), and the Minnesota Telecom Alliance (MTA) recommended changes to the Staff's Recommended Draft. The recommended changes are summarized and discussed below, with a focus on the changes recommended but not adopted by staff.

1. The Department

- The Department recommends using the term "Local Exchange Carrier" throughout, which would eliminate the need to define Local Service Provider in Chapter 7810. The Department argues that if the Commission intends for Local Service Provider to carry the same meaning as Local Exchange Carrier as defined in Minn. Stat. § 237.01, subd. 8, it should use one term consistently to avoid ambiguity.

Reply Comments

In reply comments, Dex opposed the Department's suggested changes, generally, because they are restrictive, unnecessary, and may cause delay in resolving this rulemaking.

Staff Discussion

Rule Chapter 7810 does not presently define Local Service Provider or Local Exchange Carrier. However, the existing rules imposing a directory requirement are in Chapters 7811 and 7812. Those rules currently impose the directory obligation—and all "basic service requirements"—on local service providers. Chapters 7811 and 7812 define Local Service Provider exactly as staff proposes to define the term in Chapter 7810.

Because staff's intent is neither to broaden nor to narrow the application of the rule, staff elected to use the term already in use, and simply to repeat the Chapter 7811/7812 definition in Chapter 7810 for clarity.

Staff believes that the term Local Service Provider is superior to Local Exchange Carrier. "Local Exchange Carrier" is defined in 7811/7812 as "a telephone company that is authorized to provide

local telephone service in Minnesota under Minnesota Statutes 1994, section 237.16, subdivision 2.” Minn. Stat. § 237.16, subd. 2 was repealed in 1995.²

The potential for confusion from changing the rule to apply to a Local Exchange Carrier, and thereby referring to a repealed statute, is much greater than from using a term already in use that does not inherit that ambiguity. Accordingly, staff has not adopted the Department’s recommendation.

- The Department recommends adding the phrase “and published” to 7810.2900, subp. 1. The Department asserts that it is necessary to specifically require that directories be regularly published. Citizens and Frontier do not oppose the Department’s recommended changes to 7810.2900, subp. 1.

Staff Discussion

Restating the publication requirement in this provision would appear to be inconsistent with the general subject matter of the rest of the subpart. The Staff Recommended Draft contains a requirement for regular publication of directories in parts 7811.0600 and 7812.0600.

- The Department recommends adding a requirement to printed directories to “display on the front cover the availability of, and how to access, any electronic complete directory for residential and/or business listings”

Staff Discussion:

Staff did not adopt this recommendation to maintain maximum flexibility for Local Service Providers to notify their customers of the availability and means to access an electronic directory. While many may voluntarily put this information on the front of printed directories, notification requirements in draft part 7810.2950 ensure that customers will receive effective notice of relevant directory information.

- The Department recommends specifying that electronic directories must make available information pertaining to emergency calls, including information for police and fire departments in a prominent location.

Staff Discussion

Staff did not adopt this recommendation to maintain flexibility in the presentation and technology of electronic directory information.

In drafting the requirements for electronic directories, staff were mindful of differences between presentation and use of electronic and print formats. Presentation of *relevant* emergency phone call information, beyond an instruction to call 911, presents a greater challenge in electronic format than in a printed directory that is distributed generally in a limited and certain geographic

² 1995 Minn. Laws Ch. 156 § 5.

area. Staff concluded that the usability decision involved in presenting relevant emergency call information is best left to local service providers.

- The Department recommended several changes to the Customer Option provision in 7810.2950, subps. 1 & 2. The provisions related to customer privacy have already been incorporated into the recommended draft.

Staff Discussion

The Department's recommended A, B, and C are already incorporated, with slight modification as D, E, and F in the Staff Recommended Draft.

Staff did not adopt the recommendations for 7810.2950, subps. 1 & 2 beyond those pertaining to customer privacy because they may not provide actionable guidance for local service providers. For example, the Department's recommended language is silent about notice obligations for local service providers that provide a complete directory using a combination of print and electronic publication. And, the suggested language would impose an obligation "upon issuance of a new [electronic] directory," but providers are likely to be constantly updating their electronic directories, not issuing them periodically.

However, a modified version of the Department's recommendation could serve to simplify the rule.

- The Department recommended adding language to 7811.0600 and 7812.0600 to expressly allow physical electronic media as a directory format option.

Staff Discussion:

Staff did not adopt the recommendation because it is unnecessary; the recommended draft does not exclude directories distributed as physical electronic media. The draft would allow physical electronic media as a form of electronically published directory.

2. The Minnesota Cable Communications Association

The MCCA's recommendations include 1) moving the directory-related requirements from 7810 to 7811 and 7812 and 2) adding language to expressly reflect "the need for coordination among local service providers to assemble complete directories and ensure that such coordination occurs in a fair and reasonable way."

Reply Comments

Dex opposes the MCCA's recommendations, stating that they are "solutions in search of problems, at best." Citizens and Frontier do not oppose the concept of moving the provisions into 7811 and 7812, but otherwise recommends to reject MCCA's proposals.

- The MCCA argues that the directory requirement rules fit more appropriately in chapters 7811 and 7812. The MCCA identifies several differences in defined terms that it argues supports its recommendation to move the rule from 7810 to those chapters.

Staff Discussion

Staff did not incorporate this recommendation into the recommended draft, chiefly because it arose late in the development of the rule. Moving rule language drafted to be located in one chapter into another chapter could have unforeseen, unintended consequences. Staff did not adopt the recommendation to avoid possibly undermining the growing consensus around the draft. It is unlikely that the recommendation would result in a net improvement to the rule.

However, no party in reply comments identified a substantive, negative consequence of relocating the rule. At a minimum, locating the directory requirement rules entirely within 7811/7812 would eliminate the need to define Local Service Provider in chapter 7810. The Department did not file reply comments, so the Commission does not have the advantage of a Department analysis of the MCCA recommendation. The Commission could, in its notice of intent to adopt, include notice of its intent to relocate the directory requirements entirely into 7811 and 7812, and make a final decision about relocation after providing the public a full opportunity to consider and comment on the change. This would allow the rulemaking to proceed but still allow the Commission to fully consider the merits of the recommendation.

- The MCCA recommends several changes that would cause the rule to more expressly acknowledge the cooperation needed between local service providers to publish complete directories.

Staff Discussion

Staff incorporated some, but not all of MCCA's recommended changes. Staff did not incorporate recommended changes that staff concluded were unnecessary, did not improve the rule language, or were overbroad and shifted the balance of interests.

In particular, the MCCA recommended expressly stating in the rule that the directory obligation is to "arrange for" or "make available" directories. Staff considered the qualification unnecessary. Existing directory obligations are already often satisfied through contractual arrangements, and express rule language acknowledging the practice is unnecessary.

Similarly, the MCCA recommended to restate in state rules certain nondiscrimination practices already required by federal law, but the restatement of which could be construed to broaden those requirements. Staff did not adopt recommendations that it concluded could be construed to unnecessarily shift the balance of interests within and among the entities involved in directory publication.

- The MCCA recommends that the rule "reflect a beginning presumption that most customers will receive or otherwise have access to an electronic version of the white pages directory."

Staff Discussion

Staff did not change rule language based on this recommendation. *Requiring* electronic directory availability would be a new administrative burden on all local service providers, and comments

in this docket suggest opposition to such a requirement. While it may be reasonable and in the public interest to compel local service providers to provide electronic directories notwithstanding that opposition, staff did not include the requirement to avoid possibly undermining the growing consensus around the draft.

To the extent that the MCCA's suggestion is only that the final amended rule should anticipate that most customers will, over time, receive or access electronic directories in lieu of printed directories, no additional changes to the draft are necessary. The draft is consistent with this anticipated future.

3. The Minnesota Telecom Alliance

- The MTA recommends to repeal the directory publication requirement.

Many comments through the course of the rulemaking offer support for a determination to repeal the publication requirement. In this rulemaking, the MTA, Dex, and the MCCA have supported repeal. In their most recent comments, Dex and the MCCA support the staff recommended draft, but also conditionally support repeal.

The following arguments have been offered to support repeal: (1) First Amendment considerations preclude certain directory distribution limitations;³ (2) significant changes in telecommunication have rendered the traditional telephone directory un-useful and obsolete; (3) whether to publish a directory, and in what format(s), should be left entirely to Local Service Providers' business judgment; (4) other jurisdictions have repealed, relaxed, or never adopted directory requirements.

Dex supports the repeal proposal if the Commission were inclined to do it and could do it before the end of December this year. Dex points out that, as drafted, the Staff Recommended Draft "will not increase the regulatory burden on any LEC." And Dex expresses concern about possible delay arising from consideration of the MTA's repeal proposal.

The MCCA argues that if directories are not required, customers (who may be expecting to receive printed directories) should be advised of the impact of the change.

³ This claim relied heavily on a 9th Circuit Court of Appeals case, *Dex Media West v. City of Seattle*, 696 F.3d 952 (9th Cir. 2012), in which the Court struck down a Seattle ordinance requiring yellow-pages distributors to obtain a distribution permit, pay a fee for each directory distributed, deliver only to residents and businesses not listed in a central opt-out registry, and advertise the central opt-out registry on the front cover of each directory. The Court invalidated the ordinance for failing to use the least restrictive means to achieve its goals and suggested private opt-out directories as a potentially permissible, less restrictive means.

The *Dex* case is inapposite for several reasons. Among them, this draft rule pertains to white pages listings, in the context of a Commission executing its mandate to regulate local service providers, and does not require participation in a central opt-out registry.

Staff Discussion

Staff did not adopt this recommendation. Staff sought to draft a rule that acknowledges and moves toward electronically published directories, but assumed, in the absence of Commission guidance to the contrary, that the underlying requirement for directories as a basic service requirement would remain.

The Commission may decide that mandatory telephone directories should no longer be a basic service requirement. In that case, staff agrees with MCCA that, at a minimum, some notice to customers regarding the change would be reasonable.

Staff notes that eliminating the requirement to distribute directories would not necessarily result in fewer or smaller printed directories than Staff's Recommended Draft—simply eliminating the requirement would not prohibit directory distribution. And it could diminish the Commission's ability to require electronic directories, further discourage printed directories, or otherwise regulate directory availability in the future.

- The MTA argues that local service providers alone should determine the format and availability of directories. The MTA recommends eliminating the aspect of the rule that requires local service providers to provide a printed directory if that is the customer's preference.

Staff Discussion

Staff did not adopt this recommendation because it would significantly impair the interests of customers in a basic aspect of telephone service. If a local service provider decided to make its directories available only electronically, customers without the means or ability to access the directory will be deprived of an aspect of service that the Commission has long considered a basic service requirement.

Upon Commission approval of a draft, the next steps in this rulemaking are as follows:

1. Send Commission-approved draft rules to the Revisor for final editing.
2. Prepare a *Statement of Need and Reasonableness* (SONAR) explaining and justifying each rule provision.
3. Send Commission-approved draft rules and the SONAR to the Office of the Governor for authorization to publish, and to MMB for an evaluation of the fiscal impact on local governments.
4. Draft a Dual Notice, both setting a hearing date and stating that the Commission will adopt these rules without a hearing if it does not receive the 25 requests triggering a hearing under the Administrative Procedure Act (APA).
5. Submit the approved draft rules, the dual notice, the SONAR and an additional notice plan to the Office of Administrative Hearings for approval and authorization to publish.
6. Publish proposed rules and dual notice in *State Register*.

7. Serve notice on all persons on the Commission's local service provider service list and general rulemaking lists.
8. Mail required notice to legislators specified in the APA and to the Legislative Reference Librarian.
9. Put rulemaking materials on the website.

VI. Commission Options

A. Are rule amendments are needed and, if so, what amendments?

1. Yes, the Staff Recommended Draft.
2. Yes, the Staff Recommended Draft, with the additional modifications proposed by the Department.
3. Yes, the draft proposed by MCCA.
4. Yes, the draft proposed by MTA.
5. Yes, the Staff Recommended Draft, with such modifications as the Commission deems appropriate.
6. No, no rule change is necessary at this time.

B. How should the rulemaking proceed?

1. Proceed with formal rulemaking.
 - a) Direct staff to prepare and publish a Notice of Intent to Adopt and a Statement of Need and Reasonableness.
 - b) Delegate to Commissioner Wergin the authority to approve any necessary, non-substantive edits to the draft prior to publication in the State Register.
2. Take some other action.

VII. Staff Recommendation

Staff recommends decision option A.1. and B.1.

**APPENDIX A:
STAFF RECOMMENDED DRAFT**

7810.0100 DEFINITIONS.

Subp. 11a. Complete Directory.

“Complete directory” means a directory that includes the information compiled under Rule 7810.2900, subpart 1, whether printed, electronically published, or some combination thereof. For example, a complete directory may comprise 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.

Subp. 26a. Local Service Provider.

“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.

7810.2900 FORMAT, CONTENT AND DISTRIBUTION OF DIRECTORIES.

Subpart 1. Basic Requirements.

Telephone directories shall be regularly compiled and shall contain each customer’s name, telephone number, and, if practical, address, except they shall not contain non-published telephone numbers. 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 Rule 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.

~~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.~~

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 to which a Local Service Provider directs its customers shall comply with the provisions of parts 7810.2900, subpart 1 and 7810.2950. Electronically published directories shall:

- A. display the name of the local service provider;
- B. make available information pertaining to emergency calls, including information for police and fire departments;
- C. make available 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 website;

7810.2950 DIRECTORIES: CUSTOMER OPTION.

Subpart 1. Customer Option.

A local service provider may publish printed or electronic directories, or some combination thereof. A local service provider that does not make an electronic directory available shall distribute a printed directory to each customer, except where an offer is made and explicitly refused by the customer. A local service providers that makes an electronic directory available must deliver a printed directory if that is the customer's format preference. Local service providers offering an electronic directory in lieu of any portion of a printed directory shall provide each customer a complete directory, and shall:

- A. present customers an opportunity to establish a directory format preference;
- B. permit a customer to establish or change their directory format preference at any time;
- C. notify customers how they can change their directory format preference when updated print directories are issued;
- D. not require customers to divulge any personally identifiable information other than their name and delivery address in order to request a complete directory that is printed or contained on a portable physical medium;
- E. not require users to create an account, log in, or otherwise provide any personally identifiable information in order to access an electronic directory; and
- F. not 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 format requested; and

G. not market services, including through its affiliate or publisher, other than directories to such requesting customers.

Subp. 2. When No Customer Option is Specified.

Local service providers shall determine whether customers who do not state a directory format preference will receive a printed directory, have access to an electronically published directory, or a combination thereof. Local service providers shall notify customers how the complete directory will be provided, including how to access any electronically published portion.

7811.0600 BASIC LOCAL SERVICE REQUIREMENTS.

Subpart 1. Required services.

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

Statutory Authority:

MS s 216A.05; 237.10; 237.16

7812.0600 BASIC SERVICE REQUIREMENTS.

Subpart 1. Required services.

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

Statutory Authority:

MS s 216A.05; 237.10; 237.16

Docket No. P-999/R-13-459
Additional Decision Options:

- B. 1. c) Delegate to the Executive Secretary the authority to execute documents necessary to proceed with rulemaking under the Administrative Procedure Act up to, but not including, rule adoption.
- C. **Describe the customer telephone numbers to be excluded from directories at a customer's request as follows [choose one]:**
1. 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 customer's request. (Rule currently in effect, Dept. supports)
 2. Telephone directories shall be regularly compiled and shall contain each customer's name, telephone number, and, if practical, address, except they shall not contain non-published telephone numbers. (CenturyLink)
 3. Exclude from publication both "non-published" and "non-listed" numbers, and add definitions for both terms to the draft.
 4. Another alternative preferred by the Commission.

Possible Amendment for Discussion:

7810.2950 DIRECTORIES: CUSTOMER OPTION.

Subpart 1. Customer Option.

A local service provider may publish printed or electronic directories, or some combination thereof. A local service provider that does not make an electronic directory available shall distribute 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, at least as often as print directories are issued, provide notice to customers of the availability of an electronic directory, instructions on how the electronic directory may be accessed, notice that a printed directory is available upon request, and instructions on how to make the 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 other than their name and delivery address 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, log in, or otherwise provide any personally identifiable information in order to access an electronic directory; and
- 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 format requested; and
- D. market services, including through its affiliate or publisher, other than directories to such requesting customers.

Subp. 2. When No Customer Option is Specified.

Strike subpart 2, because its function has been incorporated into Subpart 1.

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 Nos. **P421/AM-14-775**

Dated this **24th** day of **October, 2014**.

/s/Linda Chavez

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 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	SPL_SL_14-775_Interested Parties
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	SPL_SL_14-775_Interested Parties
Mark J.	Angell		Angell And Associates	1075 Rosewood Drive Grapevine, TX 76051	Paper Service	No	SPL_SL_14-775_Interested Parties
Deborah S.	Arnott		IG2, Inc.	5018 196th Street Fresh Meadows, NY 113651319	Paper Service	No	SPL_SL_14-775_Interested Parties
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street Blue Earth, MN 56013	Electronic Service	No	SPL_SL_14-775_Interested Parties
David J.	Benke	david.j.benke@state.mn.us	MN Pollution Control Agency	520 Lafayette Road North St. Paul, MN 55155	Electronic Service	No	SPL_SL_14-775_Interested Parties
Dirk	Berger	dberger@bevcomm.com	BEVCOMM Eckles Telephone Company	115 Main Street W. New Prague, MN 56071	Electronic Service	No	SPL_SL_14-775_Interested Parties
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	SPL_SL_14-775_Interested Parties
David	Bickett		Park Region Mutual Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SL_14-775_Interested Parties
David	Bickett		Valley Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SL_14-775_Interested Parties
Mark	Birkholz	N/A	Redwood County Telephone Company	160 Second Avenue SW Perham, MN 56573	Paper Service	No	SPL_SL_14-775_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Birkholz	N/A	Home Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
Mark	Birkholz	N/A	Mainstreet Communications, LLC	150 Second St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
Mark	Birkholz	N/A	Clements Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
Mark	Birkholz	N/A	Melrose Telephone Company	150 Second St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
Mark	Birkholz	N/A	Osakis Telephone	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
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	SPL_SL_14- 775_Interested Parties
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Tim	Brinkman	tim.brinkman@parkregion.c om	Park Region Mutual Telephone Co.	100 Main Street PO Box 277 Underwood, MN 56586	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Diane	Browning	diane.c.browning@sprint.c om	Sprint Corporation	KSOPHN0314-3A459 6450 Sprint Pkwy Overland Park, KS 66251	Electronic Service	No	SPL_SL_14- 775_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Danny	Busche	dannyb@means.net	Minnesota Valley Telephone Company	318 Second Ave East P O Box 310 Franklin, MN 55333-0310	Electronic Service	No	SPL_SL_14-775_Interested Parties
Lance	Casey	lance.casey@consolidated.com	Consolidated Communications	N/A	Electronic Service	No	SPL_SL_14-775_Interested Parties
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Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	SPL_SL_14-775_Interested Parties
Cathy	Clucas	cathy.clucas@centurylink.com	CenturyLink	200 South 5th St Room 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-775_Interested Parties
Regulatory	Contact	wci.regulatory@windstream.com	Windstream Communications, Inc.	600 Willowbrook Office Park Fairport, NY 14450	Electronic Service	No	SPL_SL_14-775_Interested Parties
Rod	Cox	rod.cox@tdsmetro.com	TDS Metrocom	Suite 6000 525 Junction Road Madison, WI 53717	Electronic Service	No	SPL_SL_14-775_Interested Parties
Haleh	Davary	haleh.davary@verizon.com	Verizon	c/o VERIZON 201 Spear St FL 7 San Francisco, CA 94105	Electronic Service	No	SPL_SL_14-775_Interested Parties
Mark	Erickson		City Of Lakefield	301 Main Street PO Box 1023 Lakefield, MN 561500900	Paper Service	No	SPL_SL_14-775_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christianson	Farms			RR 2 Miltona, MN 56354	Paper Service	No	SPL_SL_14- 775_Interested Parties
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	SPL_SL_14- 775_Interested Parties
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Charles	Forst	charles.forst@zayo.com	Zayo Group, LLC	400 Centennial Pkwy Ste 200 Louisville, CO 80027	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Susan	Freeman		Network Operator Services, Inc.	P.O. Box 3529 Longview, TX 75606	Paper Service	No	SPL_SL_14- 775_Interested Parties
Paul	Fuglie		Verizon Select Services	HQE01H21 600 Hidden Ridge Irving, TX 75038	Paper Service	No	SPL_SL_14- 775_Interested Parties
Wayne	Gandy		Encompass Communications, LLC	Suite 286 119 West Tyler Street Longview, TX 75601	Paper Service	No	SPL_SL_14- 775_Interested Parties
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward H.	Griffin		US LEC Communications, Inc.	6801 Morrison Blvd. Charlotte, NC 28211	Paper Service	No	SPL_SL_14- 775_Interested Parties
Donna	Gunderson		Johnson Telephone Company	205 1st Avenue NE PO Box 39 Remer, MN 56672	Paper Service	No	SPL_SL_14- 775_Interested Parties
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	SPL_SL_14- 775_Interested Parties
Mary	Haberek	mhaberek@ami.net	AMI Communications, Inc.	300 Cardinal Drive, Suite 280 St. Charles, IL 60175	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Robert L.	Hammond, Jr.	N/A	BEVCOMM, Inc.	123 W 7th St Blue Earth, MN 56013-1309	Paper Service	No	SPL_SL_14- 775_Interested Parties
Bruce	Hanson	N/A	Zumbrota Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SL_14- 775_Interested Parties
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	No	SPL_SL_14- 775_Interested Parties
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Rich	Horner		Guaranteed Phone Service	#1 2201 West Broadway Council Bluffs, IA 51501	Paper Service	No	SPL_SL_14- 775_Interested Parties
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Charles S.	Isdall		Comdata Telecommunications Services	5301 Maryland Way Brentwood, TN 37027	Paper Service	No	SPL_SL_14- 775_Interested Parties
Marja	Johnson	lisa@icom.net	Coast International Inc.	14303 West 95TH Street Lenexa, KS 66215	Electronic Service	No	SPL_SL_14- 775_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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- 775_Interested Parties
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	SPL_SL_14- 775_Interested Parties
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Kevin	Larson	klarson@ctctelcom.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Larry	Laskowski		Network Billing Systems	155 Willowbrook Blvd Wayne, NJ 7470	Paper Service	No	SPL_SL_14- 775_Interested Parties
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- 775_Interested Parties
Mary	Lohnes	mary_lohnes@mimi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Bill	Loonan		Lismore Coop. Telephone Co.	PO Box 127 Lismore, MN 56155	Paper Service	No	SPL_SL_14- 775_Interested Parties
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	SPL_SL_14- 775_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kathy	Lund	N/A	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Paper Service	No	SPL_SL_14- 775_Interested Parties
Lee	Maier	lee@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	SPL_SL_14- 775_Interested Parties
James	Mancuso	jmancuso@clearworld.net	Clear World Communications	3501 South Harbor Blvd. Suite 200 Santa Ana, CA 92704	Electronic Service	No	SPL_SL_14- 775_Interested Parties
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- 775_Interested Parties
Anthony	Mayer		WETEC LLC Db a Unitel Communications	105 Third Street West P.O. Box 151 Park Rapids, MN 56470	Paper Service	No	SPL_SL_14- 775_Interested Parties
Francie	McComb		Talk America, Inc.	2134 W. Laburnum Ave. Richmond, VA 232274342	Paper Service	No	SPL_SL_14- 775_Interested Parties
Anthony	Mendoza	tony@mendozalawoffice.com	Mendoza Law Office, LLC	790 S. Cleveland Ave. Suite 206 St. Paul, MN 55116	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Shelby	Michlin		Network Billing Systems, LLC	155 Willowbrook Blvd. Wayne, NJ 7470	Paper Service	No	SPL_SL_14- 775_Interested Parties
Monty	Morrow	montymorrow@nu- telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	SPL_SL_14- 775_Interested Parties
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- 775_Interested Parties

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Michael	Nelson	Michael_Nelson@cable.comcast.com	Comcast Corp.	183 Inverness Drive West Englewood, CO 80112	Electronic Service	No	SPL_SL_14-775_Interested Parties
David	Nelson	davidnelson@kpcoop.com	Kandiyohi Power Cooperative	P.O. Box 40 8605 47th Street NE Spicer, MN 562880040	Electronic Service	No	SPL_SL_14-775_Interested Parties
Financial	Officer		Emily Cooperative Telephone Company	P.O. Box 100 Emily, MN 564470100	Paper Service	No	SPL_SL_14-775_Interested Parties
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_14-775_Interested Parties
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	SPL_SL_14-775_Interested Parties
Gloria	Pederson	gpederson@bevcomm.com	Cannon Valley Telephone, Inc.	123 West Seventh Street Blue Earth, MN 56013	Electronic Service	No	SPL_SL_14-775_Interested Parties
Rochelle	Pervisky	RPervisky@exchange.hbcicom	Hiawatha Broadband	58 Johnson Street Winona, MN 55987	Electronic Service	No	SPL_SL_14-775_Interested Parties
Diane	Peters	diane.peters@level3.com	Level 3 Communications, LLC	225 Kenneth Dr. Rochester, NY 14623-4277	Electronic Service	No	SPL_SL_14-775_Interested Parties
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	SPL_SL_14-775_Interested Parties
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	SPL_SL_14-775_Interested Parties

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Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25 Wawina, MN 557369721	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Judith A	Riley	jriley@telecompliance.net	Mosaic Networx LLC dba MX NETWORK	PO Box 720128 Oklahoma City, OK 73172-0128	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Carey	Roesel		Technologies Management, Inc.	PO Drawer 200 Winter Park, FL 327900200	Paper Service	No	SPL_SL_14- 775_Interested Parties
Steve	Roussos	N/A	Convergia, Inc.	237 Hymns Blvd Pointe Claire, Quebec H9R 5C7 CANADA	Paper Service	No	SPL_SL_14- 775_Interested Parties
Marc	Rozar		Custom Network Solutions, Inc.	Suite 102 210 E Route 4 Paramus, NJ 76525103	Paper Service	No	SPL_SL_14- 775_Interested Parties
Jill	Sandford	jill.sandford@zayo.com	Zayo Group, LLC	360 Hamilton Avenue White Plains, NY 10601	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Jeff	Schill	jeff.schill@netins.com	Iowa Network Services Inc	4201 Corporate Drive West Des Moines, Iowa 50266	Electronic Service	No	SPL_SL_14- 775_Interested Parties
David	Schornack	N/A	Loretel Systems, Inc.	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
David	Schornack	N/A	The Peoples Telephone Company of Bigfork	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties

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David	Schornack	N/A	Felton Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
David	Schornack	N/A	East Otter Tail Telephone Company	150 2nd Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
David	Schornack	N/A	Arrowhead Communications Corporation	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14- 775_Interested Parties
James	Seliga	N/A	FTTH Communications L.L.C.	2930 146th St Ste 105 Rosemount, MN 55068	Paper Service	No	SPL_SL_14- 775_Interested Parties
Don	Snyders	don@alliancecom.net	Alliance Communications Cooperative, Inc.	PO Box 349 612 Third St Garretson, SD 57030	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Lance J.M.	Steinhart	info@telecomcounsel.com	Attorney at Law	1725 Windward Concourse Ste 150 Alpharetta, GA 30005	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Kate	Stem	BADEMAILkate.stem@accesspointinc.com	Access Point, Inc.	1100 Crescent Green, Ste. 109 Cary, NC 27518	Paper Service	No	SPL_SL_14- 775_Interested Parties
Paul	Stowman	paul@rothsay.us	Rothsay Telephone Company	PO Box 158 137 1st St NW Rothsay, MN 56579-0158	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East Cedar P.O. Box 360 Houston, MN 559430360	Electronic Service	No	SPL_SL_14- 775_Interested Parties

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Mike	Theisen		Northern Minnesota Utilities	910 Cloquet Ave. Cloquet, MN 55720	Paper Service	No	SPL_SL_14- 775_Interested Parties
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Carl	Thompson		PromiseVision Technology, Inc.	#212 1050 E 2nd Edmond, OK 73034	Paper Service	No	SPL_SL_14- 775_Interested Parties
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14- 775_Interested Parties
William	VanderSluis	N/A	CP Telecom	209 W 1st St Duluth, MN 55802	Paper Service	No	SPL_SL_14- 775_Interested Parties
Patricia	Voorhees	regulatory@matrixbt.com	Touch 1 Communications, Inc.	7171 Forest Lane suite 700 Dallas, TX 75230	Electronic Service	No	SPL_SL_14- 775_Interested Parties
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	SPL_SL_14- 775_Interested Parties
Jerry	Watts	jerry.watts@corp.earthlink.com	EarthLink	Suite 106 3000 Columbia House Blvd. Vancouver, WA 98661	Electronic Service	No	SPL_SL_14- 775_Interested Parties
Avi	Weisman		Gold Line Telemanagement Inc.	180 West Beaver Creek Rd Richmond Hill, ON L4B 1B4 CANADA	Paper Service	No	SPL_SL_14- 775_Interested Parties

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Sandra	Williams	sandrawilliams@netoneint.com	Net One International, Inc.	6933 University Blvd. Winter Park, FL 32792-6707	Electronic Service	No	SPL_SL_14-775_Interested Parties
Lyle R.	Williamson	Lyle.Williamson@Verizon.com	Verizon Wireless	8350 E Crescent Pkwy Ste 200 Greenwood Village, CO 80111	Electronic Service	No	SPL_SL_14-775_Interested Parties
Sarah	Wilson	N/A	Dex Media East, Inc.	2200 W. Airfield Drive DFW Airport, TX 75261	Paper Service	No	SPL_SL_14-775_Interested Parties
David	Wolf	dwolf@gctel.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	SPL_SL_14-775_Interested Parties