

July 31, 2014

Via Electronic Filing

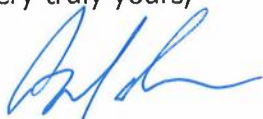
Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place E., Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Rules Requiring Distribution of Residential White Pages Directories
MPUC Docket No. P999/R-13-459

Dear Dr. Haar:

Enclosed via eFiling please find the July 31, 2014 Initial Comments of Minnesota Telecom Alliance in the above entitled docket. In addition, enclosed is a Certificate of Service.

Very truly yours,



Richard J. Johnson
Attorney At Law
(612) 877-5275
Rick.Johnson@lawmoss.com

RJJ/keb
Enclosures
cc: All parties of record

2532006v1

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

In the Matter of Rules Requiring Distribution of
Residential White Pages Directories

MPUC Docket No. P999/R-13-459

JULY 31, 2014 INITIAL COMMENTS OF MINNESOTA TELECOM ALLIANCE

The Minnesota Telecom Alliance (MTA) submits these comments to the Minnesota Public Utilities Commission (Commission) in response to the Commission's June 10, 2014 Notice of Comment Period On Possible Rule Amendments.¹ That Notice invited comments on the question: "Is the revised draft of possible amendments concerning telephone directories reasonable and necessary?" The MTA supports the Commission's initiative to amend Minnesota Rules 7810.0100, 7810.2900, 7810.2950, 7811.0600, and 7812.0600 (collectively Directory Publication Rules). For the reasons more fully explained in these Comments, the MTA recommends the following:

- The Commission should eliminate the requirement that Local Exchange Carriers (LECs) publish directories. Maintaining a requirement for LECs to publish directories is not reasonable or necessary and is fundamentally inconsistent with the dramatic changes in the manner in which people communicate, including, but not limited to, the widespread increases in the use of wireless communications as a replacement for traditional telephone services.
- The Commission should also eliminate the detailed customer options included in the draft amendments. Imposing customer options that restrict the delivery of printed

¹ MTA member CenturyLink does not join in these comments.

directories is not only unreasonable and unnecessary, but has been determined to be unlawful. Instead, the LECs should be allowed to determine whether to publish a directory and the manner of publication and delivery.

1. Background.

The Commission's decision to consider amending the current Directory Publication Rules is appropriate given the dramatic technological and market changes that have occurred in the decades since adoption of those rules. Three factors have combined to make mandatory directory publication unnecessary and unreasonable include: (1) the dramatic increase in residential competition from wireless carriers and corresponding increase in the number of persons who have cellular-only service; (2) the fact that wireless numbers are generally not available to LECs for inclusion in directories and wireless carriers are not subject to any directory publication requirements; and (3) the proliferation of alternative sources of directory listing information, primarily through the Internet and other electronic media.

The changes since the time of the Commission's initial directory rule, Part 7810.2900 (in the 1980s) and the time of the Commission's local competition rules were adopted (in the mid-1990's) have been dramatic. The emergence of the Internet and on-line access to information from multiple sources, including directory listings, has eliminated the need and justification for mandatory directory publication by the LECs. On-line Internet usage was minimal in the 1980's and has increased from approximately 10% of the population using the Internet in 1995² to approximately 80% today.³

² Since 1995, Internet usage has increased from approximately 10% of the U.S. population to nearly 80%. *See Pew Internet, Main Report* (2013), Pew Internet & American Life Project, <http://pewinternet.org/Reports/2012/Digital-differences/Main-Report/Internet-adoption.aspx>.

³ *Id.*

The large number of cellular-only residences has also greatly diminished the usefulness of white page directories. Wireless substitution for landline service did not exist to any meaningful degree when the Commission adopted its local competition rules in the 1990s. As recently as 2003, less than 5% of U.S. households had substituted wireless for their residential landline service.⁴ However, as of December 2012, approximately 38% of U.S. households did not have landline service and the percentage of wireless-only households is steadily increasing.⁵

Further, cellular numbers are not generally available to LECs and are not generally included in directories published by the LECs. It is neither reasonable nor necessary to require LECs to provide directories that do not include approximately 2 out of 5 residents and when there is no directory publication requirement for wireless carriers. These technological and market changes support eliminating the rule requirement that LECs continue distributing directories.

Eliminating a requirement to publish would not lead to the elimination of directories. For many LECs, directories are a significant source of income. However, changes in the telecommunications market fully support the elimination of requirements in favor of allowing decision making by the service providers.

2. LECs Should Be Allowed To Decide Whether To Publish Directories And How To Distribute Directories.

If a LEC elects to continue distributing white page directories, those directories are subject to the full protections of the First Amendment, which means that restrictions on distribution or publication are invalid. Directories qualify for full protection under the First

⁴ *In the Matter of Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, Sixteenth Report (March 21, 2013) at p. 26.

⁵ *In the Matter of Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, Sixteenth Report (March 21, 2013) at p. 26.

Amendment, as the Federal 9th Circuit Court of Appeals recently made clear in *Dex Media West, Inc. vs. City of Seattle (Dex)* where limitations on the distribution of printed directories were found to be invalid.⁶ Under *Dex*, the absence of literary or artistic quality does not eliminate the full protection of the First Amendment for directories.⁷ Similarly, the full protection of the First Amendment remains despite economic motivations of the publishers.⁸

While customer preferences and environmental concerns are valid policy considerations, neither meet the compelling interest standard needed to prohibit distribution of materials protected by the First Amendment.

The dramatic increases in Internet usage and competitive wireless alternatives for residential telecommunications services clearly support elimination of a mandatory publication rule. Competitive market forces should determine the levels and forms of directory information and services that are provided – both for wireless and landline LEC providers. The combination of market forces, which include expenses, revenues and customer preferences, should determine the levels and forms of directory information and services that will be provided by LECs.

Market forces are not the same in all markets. For example, large urban markets typically feature very large, multi-page directories, often separated into residential and business volumes, with and without separate yellow page advertising directories. In many smaller urban and rural markets, all residential, business and yellow page listings are combined in a single

⁶ *Dex Media West, Inc. vs. City of Seattle*, 696 F3d 592 (2012) (*Dex*).

⁷ *Dex* at 964 (“The First Amendment does not make protection contingent on the perceived value of certain speech.”) *See also*, *Dex* at 965 (“Both newspapers and yellow pages directories contain noncommercial speech; a distinction in treatment on the basis of the perceived difference in worthiness of that noncommercial speech is not permitted.”)

⁸ *Dex* at 965 (“Ultimately, we do not see a principle reason to treat telephone directories differently from newspapers, magazines, television programs, radio shows, and similar media that does not turn on an evaluation of their contents. A profit motive and the inclusion or creation of noncommercial content in order to reach a broader audience and attract more advertising is present across all of them. We conclude, therefore, that yellow pages directories are entitled to full First Amendment protection.”)

modestly sized volume. These factors have significant impacts on the economics of directory publication and distribution and on the related environmental implications.

If a customer receives a printed directory that the customer does not want, the environmental and convenience implications on the customer are limited by the fact that directories are now fully recyclable as newsprint. This means that telephone directories can be recycled in the same way as newspapers and other publications, limiting both environmental and convenience implications of distribution.

As explained in the MTA's December 6, 2013 Comments, the cost implications of selective limitations on distribution are more complex. The general assumption is that there are significant cost savings that are proportional to the number of directories that are distributed. However, the overall cost of publishing and distributing directories *may increase substantially if selective customer opt-outs are required*, especially for smaller directories that are typically delivered by US. Postal Service bulk-mail.

3. Recommended Changes to the Rules

Based on those considerations, the MTA proposes the following specific amendments:

7810.2900 FORM AND CONTENT 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 public telephone numbers or telephone numbers that are unlisted at the customer's request. Upon issuance, a local service provider shall distribute or make available ~~provide to~~ all customers served by that directory a complete directory in the format determined by the LEC, whether printed or electronic, 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.

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 telephone company business offices;

Subp. 3. Electronically Published Directories.

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 telephone company business offices; and
- D. be ~~prominently displayed on, and~~ accessible to customers from, the company's website;

7810.2950 DIRECTORIES: LEC CUSTOMER OPTION.

Subpart 1. Publication Optional Customer Option.

Delete all and substitute:

A Local Service Provider may publish printed or electronic directories, or some combination thereof.

Subp. 2. Methods of PublicationWhen 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.

4. Rules 7811.0600 and 7812.0600 BASIC LOCAL SERVICE REQUIREMENTS.

7811.0600 BASIC LOCAL SERVICE REQUIREMENTS.

Subpart 1. Required services.

~~F. one complete directory per year, 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;~~

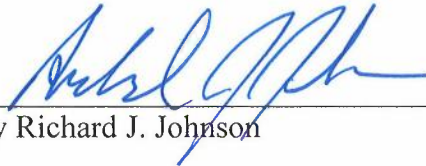
7812.0600 BASIC SERVICE REQUIREMENTS.

Subpart 1. Required services.

~~F. one complete directory per year, 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;~~

Dated: July 31, 2014

MINNESOTA TELECOM ALLIANCE



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Minneapolis, MN 55402-4129
Telephone: (612) 877-5000

Attorneys on Behalf of Minnesota Telecom
Alliance

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CERTIFICATE OF SERVICE

In the Matter of Rules Requiring Distribution
of Residential White Pages Directories

MPUC Docket No.: P999/R-13-459

Karen E. Berg certifies that on the 31st day of July, 2014, she filed a true and correct copy of the **July 31, 2014 Initial Comments of Minnesota Telecom Alliance**, by positing it on www.edockets.state.mn.us. Said document was also served via U.S. Mail and e-mail as designated on the Official Service List on file with the Minnesota Public Utilities Commission and attached hereto.

/s/ Karen E. Berg

Karen E. Berg

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mike	Allentoff		Global Crossing	225 Kenneth Dr. Rochester, NY 14623-4277	Paper 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
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
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.	Amott		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
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		Valley 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		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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	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	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	Home Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Redwood County Telephone Company	160 Second Avenue 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
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
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

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	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
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
Cathy	Clucas	cathy.clucas@centurylink.com	CenturyLink	200 South 5th St Room 2300 Minneapolis, MN 55402	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
Louie	DeCarlo	bademaillouie.decarlo@mci.com	MCImetro Access Transmission Services	9th Floor 201 Spear Street San Francisco, CA 94105	Paper 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	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
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

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	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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic 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
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
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
William	Heaston	bill.heaston@sdncommunications.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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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	Homer		Guaranteed Phone Service	#1 2201 West Broadway Council Bluffs, IA 51501	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Karen	Hyde	bademailkaren.hyde@level3.com	Level 3 Communications	200 Technology Drive Pittsburgh, PA 15219	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Charles S.	Isdall		Comdata Telecommunications Services	5301 Maryland Way Brentwood, TN 37027	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Marja	Johnson	lisa@cicom.net	Coast International Inc.	14303 West 95TH Street Lenexa, KS 66215	Electronic 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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
Lary	Laskowski		Network Billing Systems	155 Willowbrook Blvd Wayne, NJ 7470	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
John	Lindell	agonud.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@mml.net	Midcontinent Communications	3600 Minnesota Dr Ste 700 Edina, MN 55435	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
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
James	Mancuso	jmancuso@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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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
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
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
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
Bill	Otis	billotis@nu-telcom.net	New Ulm Telecom, Inc.	PO Box 697 27 North Minnesota St New Ulm, MN 56073-0697	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Bill	Otis	N/A	Sleepy Eye Telephone Co.	27 N. Minnesota Street PO Box 697 New Ulm, MN 56073	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
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.hbcicom	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
Dean	Polkow		Rural Cellular Corporation	PO Box 2000 3905 Dakota Street Southwest Alexandria, MN 563082000	Paper 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		Technologies Management, Inc.	PO Drawer 200 Winter Park, FL 327900200	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
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
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	360 Hamilton Avenue White Plains, NY 10601	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	Schomack	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	Schomack	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	Schomack	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	Schomack	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
David	Schomack	N/A	Arrowhead Communications Corporation	150 Second Street SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

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David	Schomauk		Unitel Communications	P.O. Box 151 Park Rapids, MN 55470	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
James	Seliga	N/A	FTTH Communications L.L.C.	2930 146th St Ste 105 Rosemount, MN 55068	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
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	kate.stem@accesspointinc.com	Access Point, Inc.	1100 Crescent Green, Ste. 109 Cary, NC 27518	Electronic 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 Cedar P.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

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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
William	VanderSluis	N/A	CP Telecom	209 W 1st St Duluth, MN 55802	Paper 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
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@corp.earthlink.com	EarthLink	Suite 106 3000 Columbia House Blvd. 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	Lyle.Williamson@Verizon.com	Verizon Wireless	8350 E Crescent Pkwy Ste 200 Greenwood Village, CO 80111	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
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