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March 16, 2017

VIA eFILING

Minnesota Public Service Commission
121 7th Please East, Suite 350
St. Paul. MN 55101

Re: Assist Wireless, Inc. Petition for ETC Designation
Confidential Data

Dear Docketing Clerk,

Enclosed please find, for filing, a public copy and non-public copy of the Applicants' Petition for ETC Designation. A Statement of the Applicant for Filing Protected Data is also included.

Please note that the following information considered "Trade Secret" under Minnesota Law as it represents highly confidential and strictly proprietary information, the disclosure of which to the public, including competitors, could result in direct and immediate harm to the competitive position of the Parties in this case:

- Assist's network description, filed as Confidential Exhibit 2 to the Petition;
- Assist's number of subscribers, as noted on page 3 of the Petition; and
- The identity of Assist's associated carrier, as noted on page 11 of the Petition.

Disclosure of such information could provide competitors with valuable insight into the financial and network structure of the applicant. Because this material represents highly confidential and proprietary information, and because the harm to the company resulting from disclosure is real and not speculative, Assist files this information as a Trade Secret under seal and respectfully requests that the Commission not disclose this information publicly.

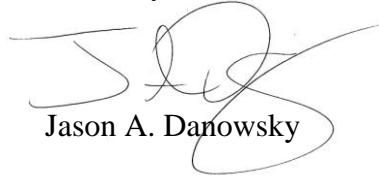
March 16, 2017
Page 2 of 2

Accordingly, the Petition containing confidential information and Confidential Exhibit 2 have been labeled in red "**NOT PUBLIC DOCUMENT — NOT FOR PUBLIC DISCLOSURE,**" and the confidential information in the Petition has been likewise prepared in red. Confidential Exhibit 2 is confidential in its entirety, and has not been prepared in red for convenience and legibility.

The public Petition has been labeled "PUBLIC DOCUMENT — NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED." The cover sheet for Confidential Exhibit 2 is included in the public Petition, but the exhibit itself is not included.

Please contact me if you wish to discuss this matter further.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Danowsky', with a large, sweeping flourish extending to the right.

Jason A. Danowsky

Enclosures

BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Petition of Assist Wireless, Inc.)
For Designation as an Eligible)
Telecommunications Carrier for the) Docket No. _____
Purpose of Offering Lifeline Service on)
a Wireless Basis)

STATEMENT OF THE APPLICANT FOR FILING OF PROTECTED DATA

1. Assist Wireless, Inc. (“Assist” or “Applicant”), by its attorneys, hereby files this Statement (“Statement”) with the Minnesota Public Utilities Commission (“Commission”).
2. Applicant’s Petition for Designation as an Eligible Telecommunications Carrier (“Petition”) contains or references information that contains confidential Trade Secret information (the “Confidential Information”). The Confidential Information has been marked as described in the cover letter filed with this Statement.
3. The Confidential Information consists of:
 - a. Assist’s network description, filed as Confidential Exhibit 1 to the Petition;
 - b. Assist’s number of describers, as noted on page 3 of the Petition; and
 - c. The identity of Assist’s associated carrier, as noted on page 11 of the Petition.
4. If this sensitive financial information is not kept confidential, it is possible that unauthorized individuals, particularly industry competitors of Applicant, could obtain access to it and use it to obtain a competitive advantage over Applicant, which could cause substantial irreparable harm to Applicant.
5. Applicant is a privately-held company and does not issue annual reports or submit any financial filings with the Securities and Exchange Commission. Applicant also is not required to disclose its financial information publicly.

6. Under Minnesota Statutes Section 13.37, items classified as "Trade Secret Data" means information that is supplied by an organization, which has taken reasonable efforts to keep the material confidential and derives economic value from not being generally known to or ascertained by other parties who may derive economic value from it.
7. Because the Confidential Information represents highly confidential and strictly proprietary Trade Secret information, the disclosure of which to the public, including competitors, could result in direct and immediate harm to the competitive position of the Applicant, there is a genuine need for the Applicant to seek non-disclosure of this information.
8. Therefore, because the information for which confidential treatment is sought in the Statement is private and competitively sensitive, and because the direct harm to Applicants' competitive position from any such disclosure is real and not speculative, the Confidential Information should be protected from public disclosure.

Accordingly, Assist Wireless, Inc. respectfully requests that the Commission protect the confidentiality of the attached Confidential Information in its Petition as a Trade Secret under Minnesota law.

Respectfully submitted,

By: 

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BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Petition of Assist Wireless, Inc. for)
Designation as an Eligible)
Telecommunications Carrier for the)
Purpose of Offering Lifeline Service)
on a Wireless Basis)

Docket No. _____

PETITION OF ASSIST WIRELESS, INC.

**PUBLIC DOCUMENT — NOT PUBLIC (OR PRIVILEGED) DATA
HAS BEEN EXCISED**

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March 16, 2017

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BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Petition of Assist Wireless, Inc.)
For Designation as an Eligible)
Telecommunications Carrier for the)
Purpose of Offering Lifeline)
Service on a Wireless Basis) Docket No. _____

PETITION OF ASSIST WIRELESS, INC.

Assist Wireless, Inc. (“Assist” or “Company”), by its counsel, respectfully submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), Section 54.201 et seq. of the Rules of the Federal Communications Commission (“FCC”), and Minn. R. 7812.1400. Assist requests that the Minnesota Public Utilities Commission (“Commission”) grant it designation as a wireless ETC in Minnesota for the sole purpose of receiving federal universal service Lifeline support in the geographic areas specified in this Petition. Assist does not request ETC status for the purpose of receiving support from any of the other Universal Service Funds (“USF”).

As discussed in more detail below, Assist meets the statutory and regulatory requirements for designation as an ETC and is able and prepared to offer Lifeline-supported services throughout the designated non-rural service area in Minnesota.¹ Granting ETC status to Assist will benefit the public interest by making the Company’s services available to a broad range of low-income consumers. Because the availability of Assist’s services so clearly serves the interests of Minnesota consumers, Assist respectfully requests that the Commission grant this Petition expeditiously. In support of this Petition, Assist provides the following information:

¹ See Section II.B.5.

I. OVERVIEW OF PETITIONER AND SERVICE OFFERINGS

A. Company Overview

Assist is a Texas corporation with principal offices at 2330 Gravel Drive, Fort Worth, Texas 76118. The Company registered with the Minnesota Secretary of State as a foreign corporation operating in Minnesota on February 27, 2017.² Assist has been designated as an ETC by the States of Arkansas, Maryland, Missouri, Oklahoma, and Wisconsin. Assist has pending ETC applications in California, Illinois, Louisiana, Texas, and Washington. In Arkansas, Maryland, Missouri, and Oklahoma, Assist presently provides Lifeline service by resale of national carriers' wireless networks. In Wisconsin, Assist provides service to its end users via a recently completed network configuration consisting of Assist's own facilities in combination with resold services of a national wireless carrier. All inbound and outbound calls for Minnesota Lifeline customers will be provisioned with the same network configuration as in Wisconsin, and Assist's facilities will be utilized in the provision of all inbound and outbound calls. The ETC designation cases in Illinois, Louisiana, and Texas are all procedurally "stayed" pending approval of a compliance plan by the FCC.³ Assist has not yet determined whether to amend the petitions in these states for provisioning through the network configuration as described herein.

Assist will manage all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and live customer service. Assist's prepaid, budget-friendly pricing will give many low-income consumers the option of having basic mobile phone service without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers will also be able to customize their mobile phone service to suit their

² A copy of the Company's foreign qualification documents for Minnesota is attached hereto as Exhibit 1.

³ See footnote 12 herein.

needs with Assist's available bundles of minutes and text packages to supplement their mobile plan.

The Company has been providing service since March 2011. Assist serves approximately [REDACTED]. Lifeline customers. Assist is successfully providing Lifeline-supported services and has a steadily increasing customer base. Assist leases its switching facilities which are dedicated to Assist's exclusive use as more particularly described in Confidential Exhibit 2. In addition, Assist has back-office and operations support systems (OSS) that are ideally suited to serve low-income subscribers. Assist Wireless has invested substantial sums to evaluate, design, develop and integrate these systems.

Assist's customer base typically will be low-income consumers who qualify for Lifeline service. Many customers will not have phone service of any kind prior to enrollment. Assist's customers will depend on and benefit greatly from Assist's inexpensive and flexible pricing plans. Assist will not impose credit checks or require any deposits or contractual commitments. Most of Assist's customers likely will turn to the Company because they cannot afford the postpaid services provided by traditional wireless carriers. The Company will affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options. As such, Assist will contribute to the expansion of mobile wireless services for low-income consumers and will seek ETC designation in additional states and jurisdictions so that it may continue to expand the service options for low-income consumers.

Assist will provide affordable prepaid mobile voice and broadband services, including text messaging, along with user-friendly handsets and high quality customer service. Assist's products and plans will be specially geared toward serving lower income communities, and its service models and pricing plans reflect this mission. Assist will not require service contracts

from its customers, and it always ensures competitive low pricing for its services and products. By providing affordable service, Assist can reach out to those who are often ignored by traditional carriers.

B. Proposed Lifeline Offering.

Assist has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the Federal Communications Commission Rules (47 C.F.R. § 4.101(a)). Upon designation, Assist will provide Lifeline service to qualifying low-income households requesting these services in Minnesota in accordance with 47 C.F.R. § 4.202(a)(1). As demonstrated herein, Assist meets all of the statutory and regulatory requirements for designation as an ETC and for participation in the federal Lifeline program. Assist respectfully requests that the Commission process and grant this application expeditiously so that qualified Minnesota residents can benefit from the high-quality services the Company intends to offer.

1. All Plans

All wireless plans will include a free handset and the following Custom Calling features:

- (1) Caller ID;
- (2) Call Waiting;
- (3) Call Forwarding;
- (4) 3-Way Calling; and
- (5) Voicemail.

No activation fee will apply to Lifeline Minnesota customers. There is no additional charge for toll calls. Calls to 911 are free. Calls to customer service by dialing 611 are free. Wireless handsets will be delivered at no charge to qualifying customers and service will be activated upon certification of the customer for Lifeline. Assist will comply with the FCC's

Lifeline Modernization Order's new handset requirements.⁴ Assist will use all low-income universal service support to offer service plans with no monthly recurring charge, thus ensuring that the consumer receives 100% of all universal service support funding for which the Company will seek reimbursement from the Universal Service Fund necessary to provide the free minutes of airtime as provided in the plans. Assist will also offer plans with increased voice, text, and data, and Assist will use all low-income universal service support to discount these plans, thus ensuring that the consumer receives 100% of all universal service support funding for these plans as well.

2. Individual Lifeline Plans

Assist initially proposes to offer eight different Lifeline-assisted plans to Minnesota Lifeline consumers.⁵ For qualified Lifeline customers who do not want a data plan, Assist offers three plans offering varying amounts of voice minutes and text messages. Assist offers plans that meet the FCC's minimum standards for voice minutes.⁶ For qualified Lifeline customers who do want a data plan, Assist offers five plans with varying amounts of voice minutes, text messages, and mobile broadband. These Assist plans meet the FCC's minimum standards for mobile broadband.⁷ Additionally, Assist proposes to provide Lifeline services to eligible residents residing on Federally Recognized Tribal Lands in Minnesota.

⁴ See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (FCC rel. Apr. 27, 2016) (hereinafter, "Lifeline Modernization Order"), at ¶ 378.

⁵ See Exhibit 3, "Proposed Lifeline Offerings," summarizing the Company's retail wireless rate plans to which Assist seeks to apply the Lifeline discount.

⁶ See Lifeline Modernization Order at ¶ 64.

⁷ See Lifeline Modernization Order at ¶ 65.

II. ASSIST SATISFIES THE COMMISSION’S AND THE FCC’S REQUIREMENTS FOR ETC DESIGNATION

Per the Commission’s Rules, petitioners seeking ETC designation in Minnesota are evaluated under the standards set by the FCC.⁸ Section 214(e)(2) of the Act provides that, upon request and consistent with the public interest, convenience and necessity, the Commission may designate more than one common carrier as an ETC in areas served by a rural telephone company and shall do so with respect to all other areas, provided that the requesting carrier (i) offers services that are supported by federal universal service support mechanisms and (ii) advertises the availability of such services.⁹ FCC rules impose additional requirements on a carrier requesting ETC designation. As demonstrated below, Assist more than satisfies each of these requirements.

A. Assist Will Operate as a Common Carrier.

Assist will operate as a common carrier as defined in 47 U.S.C. § 153(10) and thus is eligible for designation as an ETC. The FCC has consistently held that providers of wireless services are to be treated as common carriers for regulatory purposes. Moreover, Assist is a commercial mobile radio service (“CMRS”) provider. Section 332(c)(1)(A) of the Act states that CMRS providers will be regulated as common carriers.¹⁰

⁸ See Minn. R. 7812.1400 subp. 2 and 7812.0100 subp. 15.

⁹ 47 U.S.C. §214(e)(2); see also 47 C.F.R. § 54.201(d).

¹⁰ See 47 U.S.C. § 332(c)(1)(A).

B. Assist Will Provide the Services Designated for Lifeline Support.

The FCC has determined that voice telephony services and broadband Internet access services shall be supported by the federal USF program.¹¹ Eligible voice telephony services must provide:

- voice grade access to the public switched network;
- local usage;
- access to emergency services; and
- toll limitation for qualifying low-income consumers.

Upon receiving the requested designation as an ETC, Assist will provide each of these required services throughout its designated service area, as described in more detail below. Assist's Lifeline service offering will be provided as described in this Petition and pursuant to details on the Company's website, available at: <http://www.assistwireless.com>. Assist will offer Lifeline subscribers attractive voice telephony and broadband service plans. The Company's Lifeline subscribers will be eligible to receive the same service plans that Assist will make available to the public at large.

1. Means of providing Lifeline service.

Section 214(e)(1)(A) requires that a carrier must use its own facilities or a combination of its own facilities and resale of another carrier's facilities in order to provide universal service supported services. Assist has recently completed a new network for provision of wireless voice telephony and broadband which utilizes a combination of elements provided by a national wireless carrier with Assist's own facilities. This network will be used for all calls to and from Assist's Lifeline customers in Minnesota.

Assist does not seek forbearance from the "own facilities" requirement.¹² Assist will instead provide Lifeline services through a combination of resale and its own facilities as

¹¹ 47 C.F.R. § 54.101(a).

explained in attached Confidential Exhibit 2 “Assist Wireless Own Facilities Description.” Pursuant to its ETC designation, Assist will provide supported services as follows.

2. Voice Grade and Broadband Access.

The FCC has stated that voice-grade access consists of the ability for a user to make and receive telephone calls within a specified bandwidth.¹³ Assist will provide this service via the network configuration explained in the attached Confidential Exhibit 2. Consistent with the Lifeline Modernization Order,¹⁴ Assist proposes plans that meet the FCC’s minimum broadband data offerings. Assist’s offerings are discussed above at Section I.B.2 and in attached Exhibit 3.

3. Access to emergency services.

The Company will provide access to emergency services provided by local government or public safety officials, including 911 and E-911 where available. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. In addition, Assist will comply with any FCC or Commission requirements regarding customer access to 911 and E-911 services as well as the provision of

¹² In its *Lifeline Reform Order*, the FCC decided to forbear from applying the federal Communications Act’s facilities requirement of section 214(e)(1)(A) to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program, subject to certain conditions. One of those conditions was: “the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.” *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (FCC rel. Feb. 6, 2012) (“*Lifeline Reform Order*”) at ¶368. Assist Wireless did timely file a compliance plan with the FCC. In fact, a total of seventy-eight (78) compliance plans were submitted to the Wireline Competition Bureau (“Bureau”). In the second half of 2012, twenty (20) plans were approved by the Bureau. The last approval was released December 26, 2012. Since that time, and to the best of Assist Wireless’ knowledge and information, the Bureau has not approved any compliance plan whatsoever and has not provided any public explanation as to why over fifty (50) plans – including the plan submitted by Assist Wireless - have been allowed to languish with no action. No announcement was ever made as to how or why particular plans were selected for approval or why companies whose pending compliance plans are substantially the same as those approved have not also received approval.

¹³ *Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776, 8810-11 (1997).

¹⁴ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (FCC rel. Apr. 27, 2016).

E911-compatible handsets, and Assist will provide certification that it is not in arrears for amounts owed to the 911 emergency telecommunications service account.

4. Toll limitation for qualifying low-income consumers.

Assist will not provide toll limitation service (“TLS”). Like most wireless carriers, Assist does not differentiate domestic long distance usage from local usage and all usage is paid for in advance. Pursuant to the Lifeline Reform Order, subscribers to such “all-distance” services are not considered to have voluntarily elected to receive TLS.¹⁵

5. Service area.

Sections 214(e)(2) and 214(e)(5) of the Act provide that ETC designations shall be made for a “service area,” defined as a geographic area established by the state commission. Attached as Exhibit 4 is a list of the wire centers the Company proposes to serve and requests that the list of wire centers constitute the Minnesota service area.

6. Informational tariff and/or customer service agreement.

Additional information regarding the Company’s plans, rates and services will be included on Assist’s website, www.assistwireless.com. Within 30 days of the Commission’s order conditionally approving Assist’s Petition, Assist will file with the Commission an informational tariff and/or a customer service agreement, revised as necessary to meet Minnesota requirements. This tariff or agreement will include a detailed description of the Company’s Lifeline offering, any additional services which may be added to it, and the areas in Minnesota in which it is offered. The tariff or agreement will include the customer protection and service quality standards to which Assist commits. Assist will notify the Commission, in writing,

¹⁵ See *Lifeline Reform Order*, ¶ 230.

immediately upon any change to its Lifeline offering terms, conditions or rates, or if it seeks to withdraw its Lifeline offering or any portion thereof.

C. Assist Will Advertise its Lifeline Service Offerings.

Assist will advertise the availability of its services and charges in a manner reasonably designed to reach Lifeline-eligible consumers.¹⁶ The Company intends to advertise its Lifeline services using media of general distribution.¹⁷ Assist will expand its advertising efforts if necessary to ensure that Lifeline-eligible customers are aware of the service offerings.¹⁸

In addition, Assist will comply with the FCC's revised rules regarding information to be included in marketing materials.¹⁹ Specifically, Assist's marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) Assist is the provider of the services. Moreover, Assist's Lifeline customer application/certification form will state that Lifeline is a federal benefit and that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

¹⁶ 47 C.F.R. §§ 54.201(d)(2), 54.405(b).

¹⁷ See 47 C.F.R. § 214(e)(1)(B) and 47 C.F.R. § 54.201(d)(2).

¹⁸ See 47 C.F.R. § 54.405(b).

¹⁹ 47 C.F.R. § 54.405;

D. Assist Complies with the Commission's and the FCC's Additional Obligations for ETCs.

1. Assist certifies that it will comply with the applicable FCC service requirements.

Per the requirements of 47 CFR § 54.202(a)(1)(i), Assist certifies that it will comply with the service requirements applicable to the low-income support it receives as a result of designation as an ETC for the purposes of receiving Lifeline.

2. Assist has the ability to remain functional in emergency situations.²⁰

Assist's Lifeline services will remain functional in emergency situations. Assist certifies that it will be able to function in emergency situations to the extent that its underlying network providers are able to do so. Assist will provide service using its own facilities and elements, including emergency services, of the national wireless network of [REDACTED] [REDACTED] comply with applicable requirements for emergency service, including available power supplies. [REDACTED] have implemented state-of-the-art network reliability standards, and Assist and its customers benefit from their high standards. Throughout its existence, Assist's service reliability has compared favorably with that of any operator in the CMRS industry.

Assist is capable of managing traffic spikes that may occur during emergency situations and can reroute traffic in the event of damaged facilities. Both Assist, [REDACTED] have sufficient back-up power to ensure functionality if its external power supply is unavailable. Indeed, [REDACTED] have certified to the FCC that their networks function in emergency situations.²¹

²⁰ See, e.g., 47 C.F.R. § 54.202(a)(2).

²¹ [REDACTED]

3. Assist will satisfy applicable consumer protection and service quality standards.

The FCC's rules require the petitioner to demonstrate that it satisfies applicable consumer protection and service quality standards. The FCC has stated that a wireless petitioner's commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy this requirement.²² Assist commits to comply with the CTIA Consumer Code to ensure that the Company offers its subscribers the highest level of protection and quality service.²³ In addition, Assist intends to fully comply with the consumer protection and service quality standards articulated in Minn. R. 7812.0700 and 7810.0100 through 7810.6100 to the extent they are applicable to wireless providers.

Assist's pledge to provide quality service, and to comply with the CTIA Consumer Code and applicable Minnesota rules on consumer protection and service quality, evidences Assist's commitment to satisfy all of the applicable consumer protection and service quality standards. The Company will make every effort to resolve expeditiously complaints received by the Commission and will designate a specific contact person to work with Commission staff to resolve any complaints or other compliance issues. Assist also will incorporate a Minnesota-specific provision into its service terms and conditions to apprise Minnesota Lifeline customers that they may contact the Commission for assistance in resolving disputes or complaints. Assist's customers will be able to call customer service by dialing 611 from their Assist handset and no minutes will be used or decremented for the call. Customers also will be able to call, toll-free, (866) 966- 2628 from any phone to reach customer service. Live customer service operators

²² 47 C.F.R. § 54.202(a)(3).

²³ *See, e.g.*, 47 C.F.R. § 54.202(a)(3).

will be available between 8:00 am and 8:00 pm Monday through Friday (all times Eastern Standard Time).

4. Assist is financially and technically capable of providing Lifeline services in compliance with the FCC's rules.

The FCC's rules require ETC petitioners to demonstrate financial and technical capability to comply with the FCC's Lifeline service requirements.²⁴ Among the factors to be considered are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, and whether the carrier receives revenues from other sources.

Assist has provided service since March of 2011, and has a management team with substantial experience in providing wireless communications service. Assist's key management team of Byron Young, David Dorwart, and Kelly King has over 50 years of combined telecommunications experience. Their experience and skill sets specifically make them capable of fulfilling the requirements necessary to manage the implementation and ongoing support of this ETC designation.²⁵

Assist has never had a lapse in collecting and remitting any public purpose program surcharges of any kind. Assist leases its own dedicated switching facilities, and has back-office and operations support systems (OSS) that are ideally suited to serve low income subscribers. Assist has invested substantial sums to evaluate, design, develop and integrate these systems. Further, Assist does not rely exclusively on Lifeline reimbursement to operate, as it receives revenues from other sources in the form of non-Lifeline customers.

²⁴ *Lifeline Reform Order*, ¶¶ 387-388.

²⁵ See attached Exhibit 5, "Assist Wireless Key Personnel."

5. Assist will comply with FCC requirements on certification and verification.

Section 54.410 of the FCC's Rules requires ETCs to comply with certification of eligibility and verification of continued eligibility requirements for Lifeline participation. The Rules were substantially overhauled in the 2012 FCC Lifeline Reform Order.²⁶ The Lifeline Reform Order adopts a number of measures intended to standardize Lifeline enrollment and compliance on a nationwide basis. Assist will certify and verify consumer eligibility in accordance with the FCC's requirements.

6. Assist will comply with Commission and FCC requirements on fees, charges, and reports.

Assist will comply with all applicable Commission and FCC requirements on fees, charges, and reports. The Company will not collect service deposits for its plans and will not charge a number-portability fee for Lifeline accounts.²⁷ Furthermore, Assist will comply with the FCC's annual reporting requirements for ETCs as set forth in Section 54.422 of the FCC's Rules.²⁸ If Assist determines that it cannot reasonably serve a consumer, it will report the unfulfilled request to the Minnesota Department of Commerce and the Commission within 30 days after making such a determination.

7. Assist will comply with Commission and FCC requirements on relinquishment of ETC designation.

If at some point in the future, Assist seeks to relinquish its ETC designation, Assist will comply with the requirements of Minn. R. 7812.1400 subp. 14 and 47 C.F.R. § 54.205.

²⁶ See Lifeline Reform Order, ¶ 97, *et seq.*

²⁷ See 47 C.F.R. § 54.401(c), (e).

²⁸ See 47 C.F.R. § 54.422.

III. INFORMATION REQUIRED BY MINN. R. 7812.1400 SUBP. 4.

In accordance with Minn. R. 7812.1400 subp. 4.A through F, Assist provides the following information:

- A. The legal name, address and telephone number of the Company and its designated contact person is:

Byron Young
CEO
2330 Gravel Dr.
Fort Worth, TX 76118
(817) 754-0371
(817) 887-1738/fax
byron.young@viaoneservices.com

- B. The name, address and telephone number of the Company's attorneys are:

Mark Foster
Jason Danowsky
FosterLaw
904 West Ave. Ste 107
Austin, TX 78701
Phone: 512-708-8700
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- C. The proposed effective date of the designation of eligibility to receive universal service support is upon grant of this Petition.
- D. The signature and title of the Company officer or representative authorizing the Petition is provided in the attached Verification.
- E. Information concerning the service area for which designation is sought, the local exchange carrier(s) servicing that area, and whether the Company considers any identified local exchange carrier to be a rural telephone company is presented in Exhibit 4.
- F. The Company's commitment to comply with the service quality requirements articulated in Minn. R. 7812.0700 (including those incorporated by reference – Minn. R. 7810.0100 through 7810.6100), insofar as applicable to wireless resale operations, is provided in Section II above.

IV. GRANT OF THIS PETITION WILL SERVE THE PUBLIC INTEREST.

A. Designation of Assist as a competitive ETC will lead to increased competition.

Assist submits that the public interest would be benefited by Assist's designation as an ETC in the requested expanded study area. The FCC has observed that "the best way to [increase competition and innovation] is to increase the number of service providers offering Lifeline services."²⁹

The additional ETC competition will serve the public interest. Consumers will benefit from Assist's high quality service, competitive pricing and a dedicated focus and marketing emphasis on low-income consumers who are eligible for Lifeline supported services. Assist offers low-income consumers a competitive option of no contract/no credit check/no deposit service. Assist further expects consumers will choose Assist's service offerings for their high quality service and Assist's attention to overall customer satisfaction.

As provided by the Act, the availability of basic telecommunications services to low-income consumers is critical to the provision of public health, safety, and other services. In addition, the FCC has long acknowledged the benefits to consumers of being able to choose from a variety of telecommunications providers and the resulting variety of telecommunications services they provide.³⁰

B. Designation of Assist as a competitive ETC will benefit the USF

The designation of Assist as a competitive ETC will not have a negative impact on the USF. If Assist's offering does not provide consumer benefits, then it will win no customers and

²⁹ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Proposed Rule, FCC 15-71 (FCC rel. Jun. 22, 2015) at ¶ 115.

³⁰ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (FCC rel. Apr. 27, 2016) ("[W]e expect that increasing provider participation will increase competition among providers in the Lifeline program and incentivize providers to offer better quality services.").

receive no support from the USF, in which case no party or consumer is harmed. On the other hand, if Assist's offering provides significant consumer benefits, then it will win customers and other competitors can be expected to respond by improving their service offerings in order to retain customers. Again, no party or consumer is harmed and consumers get the well-documented benefit of ongoing investment, improvements, and price and service enhancements caused by competition. It is also important to recognize that in the case of Lifeline support, an ETC receives USF support only for the customers it obtains. In the scenario where a competitive ETC obtains a Lifeline customer from another ETC, only the "capturing" ETC provides Lifeline discounts, and as a result, only the "capturing" ETC receives support reimbursement.


In addition, all providers are required to contribute a portion of the interstate revenues received from their customers to the USF. Assist will make such contributions in accordance with current federal regulations. As such, approving Assist as an ETC may actually result in new contributions to the USF that were previously nonexistent.

Assist reiterates that it is applying for ETC designation solely for the purpose of providing Lifeline discounts to qualified low-income consumers and to seek reimbursement for the same. Assist will not seek or accept high-cost support unless it returns to the Commission requesting an appropriate amended designation in a separate docket.

V. CONCLUSION

Assist respectfully requests that the Commission expeditiously issue an order designating the Company as an ETC in Minnesota throughout the non-rural service area specified above for the purpose of receiving federal support and reimbursement for provision of low-income communications services on a wireless basis to qualified low-income customers.

Respectfully submitted,

By: 

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Exhibit 1

Foreign Qualification Documents for Minnesota

Office of the Minnesota Secretary of State Certificate of Authority

I, Steve Simon, Secretary of State of Minnesota, do certify that: The following business entity has duly complied with the relevant provisions of Minnesota Statutes listed below, and is formed or authorized to do business in Minnesota on and after this date with all the powers, rights and privileges, and subject to the limitations, duties and restrictions, set forth in that chapter.

The business entity is now legally registered under the laws of Minnesota.

Name in Minnesota: Assist Wireless, LLC

Name in Home Jurisdiction: Assist Wireless, LLC

File Number: 936005000034

Minnesota Statutes, Chapter: 322C

Home Jurisdiction: Texas

This certificate has been issued on: 02/27/2017



Steve Simon

Steve Simon
Secretary of State
State of Minnesota

Confidential Exhibit 2

NOT PUBLIC DOCUMENT — NOT FOR PUBLIC DISCLOSURE

Assist Wireless Own Facilities Description

Exhibit 3

Proposed Lifeline Offerings

Offering (Talk/Text/Data)	Non Tribal	Tribal	Prepaid Plans	Prepaid Plans
500/500	Free	N/A	\$9.25	N/A
500/1500	\$1.00	N/A	\$10.25	N/A
1000/Unlimited	\$5.00	N/A	\$14.25	N/A
50/100/500MB	Free	N/A	\$9.25	
1000/Unlimited/500MB	\$25.00	Free	\$34.25	N/A
Unlimited Talk/Text/500MB	\$26.00	\$1.00	\$35.25	\$49.99
Unlimited Talk & Unlimited Text + 1 GB	\$30.00	\$5.00	\$39.25	\$54.99
Unlimited/Unlimited/2GB	\$40.00	\$15.00	\$49.25	\$66.99

Voice / Text Refills	All States 30 days		Data Refills	All States 30 days
100 Voice Mins	\$4.00		100mb Data	\$4.00
200 Voice Mins	\$8.00		500mb Data	\$16.00
400 Voice Mins	\$11.00		1GB Data	\$20.00
1000 Voice Mins	\$20.00			
1000 Texts	\$5.00			
2000 Texts	\$10.00			
4000 Texts	\$16.00			
100 Voice/1000 Text	\$7.00			
250 Voice/2500 Text	\$13.00			
500 Voice/5000 Text	\$19.00			

Bundled Packages	Effective as of 12_1_2016
One (1) Day Unlimited Talk/Text	\$5.00
Three (3) Day Unlimited Talk/Text	\$8.00
One Week (7) Days Unlimited Talk/Text	\$13.00
Two Week (14) Days Unlimited Talk/Text	\$20.00
100/1000/1GB Ninety Day (90) T/T/Data	\$25.00

Exhibit 4

List of Proposed Service Areas

Minnesota ETC Designated Service Areas

<u>Company</u>	<u>OCN</u>	<u>Ratecenter</u>	<u>CLLI</u>	<u>Switch Name</u>	<u>Rural/Non Rural</u>
AT&T LOCAL	7421	DULUTH	DLTHMNAS1MD	DULUTH	Non Rural
AT&T LOCAL	7421	DULUTH	DLTHMNAS2MD	DULUTH	Non Rural
AT&T LOCAL	7421	ST CLOUD	STCDMNATJMD	ST. CLOUD	Non Rural
AT&T LOCAL	7421	ST CLOUD	STCDMNAT3MD	ST. CLOUD	Non Rural
AT&T LOCAL	7421	ROCHESTER	MDFDMNAT2MD	MEDFORD	Non Rural
AT&T LOCAL	7421	ROCHESTER	ROCHMNRO1MD	ROCHESTER	Non Rural
AT&T LOCAL	7421	TWINCITIES	MPLSMNDT62H	MINNEAPOLIS	Non Rural
AT&T LOCAL	7421	TWINCITIES	MPLSMNDTDS9	MINNEAPOLIS	Non Rural
AT&T LOCAL	7421	TWINCITIES	MPLSMNDTDS8	MINNEAPOLIS	Non Rural
AT&T LOCAL	7421	TWINCITIES	GLVYMNORHMD	GOLDEN VALLEY	Non Rural
AT&T LOCAL	7421	OSSEO	MPLSMNDT62H	MINNEAPOLIS	Non Rural
AT&T LOCAL	7421	TWINCITIES	GLVYMNORHMD	GOLDEN VALLEY	Non Rural
AT&T LOCAL	7421	TWINCITIES	MPLSMNDTDS9	MINNEAPOLIS	Non Rural
AT&T LOCAL	7421	TWINCITIES	GLVYMNORHMD	GOLDEN VALLEY	Non Rural
AT&T LOCAL	7421	TWINCITIES	GLVYMNORDMD		Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	DAWSON	STCDMNTOSMD		Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	MADISON	MDSNMNXMDS0	MADISON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	DAWSON	DWSNMNXDDS0	DAWSON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	CANBY	CNBYMNXCDS0	CANBY	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	ST LEO	STLEMNXSR52	ST. LEO	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	JANESVILLE	JNVLMNXJDS0	JANESVILLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	FAIRMONT	FAMTMNXFDS0	FAIRMONT	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	FAIRMONT	FAMTMNXFDS0	FAIRMONT	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	HENDERSON	HNSNMNXHRS2	HENDERSON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	IONA	IONAMNXIRS2	IONA	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	ELYSIAN	ELYSMNXERS2	ELYSIAN	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	PORTER	PTERMNXPRS2	PORTER	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	GREEN ISLE	GRISMNXGRS3	GREEN ISLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	AVOCA	AVOCMNXARS3	AVOCA	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	LE CENTER	LECTMNXLDS0	LE CENTER	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	WATERVILLE	WTVLMNXWDS0	WATERVILLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	MONTGOMERY	MTGMMNXMDS0	MONTGOMERY	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	WORTHINGTN	WOTNMNXWDS0	WORTHINGTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	WORTHINGTN	WOTNMNXWDS0	WORTHINGTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	LEWISVILLE	LWVLMNXLRS4	LEWISVILLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	NORTHROP	NROPMNXNRS4	NORTHROP	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	EDGERTON	EGTNMNXEDS0	EDGERTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	LEOTA	LEOTMNXLRS4	LEOTA	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	ADRIAN	ADRNMNXADS0	ADRIAN	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	KILKENNY	KLKNMNXKRS5	KILKENNY	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	CEYLON	CYLNMNXCRS6	CEYLON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TRIMONT	TRMTMNXTRS0	TRIMONT	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	LAKEFIELD	LKFDMNXLDS0	LAKEFIELD	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	CHANDLER	CHNDMNXCRS6	CHANDLER	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	IVANHOE	IVNHMNXIRS6	IVANHOE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	WELCOME	WLCMMNXWRS7	WELCOME	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	BALATON	BLATMNXBDS0	BALATON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	CURRIE	CURRMNXCRS7	CURRIE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	SHERBURN	SHBNMNXSR57	SHERBURN	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	EAST CHAIN	ECHNMNXERS7	EAST CHAIN	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TRUMAN	TRNMNMXTRS7	TRUMAN	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	SLAYTON	SLTNMNXSDS0	SLAYTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	OKABENA	OKBNMNXORS8	OKABENA	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	LAKEWILSON	LKWLMNXLRS8	LAKE WILSON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	ARLINGTON	ARTNMNXADS0	ARLINGTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	ELLSWORTH	ELWOMNXERS9	ELLSWORTH	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	RSMTMNXR42G		Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	RSMTMNXRDS0	ROSEMOUNT	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	FRTNMNXFRS4	FARMINGTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	FRTNMNXFRS4	FARMINGTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	APVYMNXAPS2	APPLE VALLEY	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	RSMTMNXR42G		Non Rural

Minnesota ETC Designated Service Areas

FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	RSMTMNXR42G		Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	APVYMNXADS0	APPLE VALLEY	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	APVYMNXADS0	APPLE VALLEY	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	BRVLMNXARS4	SOUTH BURNSVILLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	FRTNMNXFRS4	FARMINGTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	FRTNMNXFRS4	FARMINGTON	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	LKVL MNXLRS4	LAKEVILLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	JRDNMNXJ49G		Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	BLLPMNXADS0	BELLE PLAINE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	APVYMNXADS0	APPLE VALLEY	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	BRVLMNXARS4	SOUTH BURNSVILLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	BRVLMNXARS4	SOUTH BURNSVILLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	APVYMNXADS0	APPLE VALLEY	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	LKVL MNXLRS4	LAKEVILLE	Non Rural
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	1367	TWINCITIES	APVYMNXADS0	APPLE VALLEY	Non Rural
QWEST CORPORATION	9631	SILVER BAY	SLBAMNSARS2	SILVER BAY	Non Rural
QWEST CORPORATION	9631	MOORHEAD	FARGNDBC23G	FARGO-MOORHEAD	Non Rural
QWEST CORPORATION	9631	MOORHEAD	FARGNDBC23G	FARGO-MOORHEAD	Non Rural
QWEST CORPORATION	9631	COLERAINE	CLRNMNCORS2	COLERAINE	Non Rural
QWEST CORPORATION	9631	MARBLE	MRBLMN MARS2	MARBLE	Non Rural
QWEST CORPORATION	9631	CHISHOLM	CHSHMNCRS2	CHISHOLM	Non Rural
QWEST CORPORATION	9631	BUHL	BUHLMNBURS2	BUHL	Non Rural
QWEST CORPORATION	9631	HIBBING	HBNGMNHIDS0	HIBBING	Non Rural
QWEST CORPORATION	9631	HIBBING	HBNGMNHIDS0	HIBBING	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	CROOKSTON	CKTNMNCRRS2	CROOKSTON	Non Rural
QWEST CORPORATION	9631	MOORHEAD	FARGNDBC23G	FARGO-MOORHEAD	Non Rural
QWEST CORPORATION	9631	MOORHEAD	FARGNDBC23G	FARGO-MOORHEAD	Non Rural
QWEST CORPORATION	9631	MOORHEAD	FARGNDBC23G	FARGO-MOORHEAD	Non Rural
QWEST CORPORATION	9631	GRAND RPDS	GDRPMNGRDS0	GRAND RAPIDS	Non Rural
QWEST CORPORATION	9631	GRAND RPDS	GDRPMNGRDS0	GRAND RAPIDS	Non Rural
QWEST CORPORATION	9631	GRAND RPDS	GDRPMNGRDS0	GRAND RAPIDS	Non Rural
QWEST CORPORATION	9631	GRAND RPDS	CHSTMNCHRS3	BASS BROOK	Non Rural
QWEST CORPORATION	9631	CASS LAKE	CSSLMNCLRS3	CASS LAKE	Non Rural
QWEST CORPORATION	9631	SILVER BAY	FNLDMNFORS3	FINLAND	Non Rural
QWEST CORPORATION	9631	HIBBING	HBNGMNHIDS0	HIBBING	Non Rural
QWEST CORPORATION	9631	CARLTON	CRTOMNCBRS3	DULUTH-CARLTON	Non Rural
QWEST CORPORATION	9631	GRANDMRAIS	GDMRMNGMDS0	GRAND MARAIS	Non Rural
QWEST CORPORATION	9631	BARNUM	BRNMMNBARS3	BARNUM	Non Rural
QWEST CORPORATION	9631	HAWLEY	HWLYMNHARS4	HAWLEY	Non Rural
QWEST CORPORATION	9631	MOOSE LAKE	MOLKMNMLRS4	MOOSE LAKE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNLARS5	DULUTH-LAKESIDE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631		NOCLLIKOWN		Non Rural
QWEST CORPORATION	9631	MOOSE LAKE	MOLKMNMLRS4	MOOSE LAKE	Non Rural
QWEST CORPORATION	9631	HENNING	HNGMNHRS5	HENNING	Non Rural
QWEST CORPORATION	9631	COMSTOCK	CMSTMNCORS6	COMSTOCK	Non Rural
QWEST CORPORATION	9631		NOCLLIKOWN		Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNCBRS6	DULUTH	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNBRS6	DULUTH-DOUGLAS	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNCBRS6	DULUTH	Non Rural
QWEST CORPORATION	9631	WADENA	WADNMNWA63G	WADENA	Non Rural
QWEST CORPORATION	9631		NOCLLIKOWN		Non Rural
QWEST CORPORATION	9631	BRECKENRDG	WHTNNDBCDS0	WAHPETON-BRECKEN	Non Rural
QWEST CORPORATION	9631	TOFTE	TOFTMNTBRS6	TOFTE	Non Rural
QWEST CORPORATION	9631	COOK	COOKMNCORS6	COOK	Non Rural
QWEST CORPORATION	9631	THIFRIVFLS	TRFLMNTBRS6	THIEF RIVER FALLS	Non Rural
QWEST CORPORATION	9631	THIFRIVFLS	TRFLMNTBRS6	THIEF RIVER FALLS	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	DULUTH	ISLKMNILRS1	DULUTH-ISLAND LAKE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNAFRS7	DULUTH-HEMLOCK	Non Rural

Minnesota ETC Designated Service Areas

QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNAFRS7	DULUTH-HEMLOCK	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNPLRS7	DULUTH-PIKE LAKE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	PARKRAPIDS	PKRPMNPRDS1	PARK RAPIDS	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	VIRGINIA	MTIRMNMIRS7	MOUNTAIN IRON	Non Rural
QWEST CORPORATION	9631	FERGUS FLS	FRFLMNFB73G	FERGUS FALLS	Non Rural
QWEST CORPORATION	9631	FERGUS FLS	FRFLMNFB73G	FERGUS FALLS	Non Rural
QWEST CORPORATION	9631	VIRGINIA	VRGNMNVIDS0	VIRGINIA	Non Rural
QWEST CORPORATION	9631	VIRGINIA	VRGNMNVIDS0	VIRGINIA	Non Rural
QWEST CORPORATION	9631	VIRGINIA	EVLTMNEVRS0	EVELETH	Non Rural
QWEST CORPORATION	9631	VIRGINIA	VRGNMNVIDS0	VIRGINIA	Non Rural
QWEST CORPORATION	9631	VIRGINIA	VRGNMNVIDS0	VIRGINIA	Non Rural
QWEST CORPORATION	9631	BEMIDJI	BMDJMNB75G	BEMIDJI	Non Rural
QWEST CORPORATION	9631	BEMIDJI	BMDJMNB75G	BEMIDJI	Non Rural
QWEST CORPORATION	9631	BEMIDJI	BMDJMNB75G	BEMIDJI	Non Rural
QWEST CORPORATION	9631	EGRNDFORKS	GDFRND77G	GRAND FORKS	Non Rural
QWEST CORPORATION	9631	KEEWATIN	KEWTMNBKERS7	KEEWATIN	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	DULUTH	DLTHMNME72G	DULUTH-MELROSE	Non Rural
QWEST CORPORATION	9631	SABIN	SABNMNSARS7	SABIN	Non Rural
QWEST CORPORATION	9631	BRAINERD	BRNRMNBRDS0	BRAINERD	Non Rural
QWEST CORPORATION	9631	BRAINERD	BRNRMNBRDS0	BRAINERD	Non Rural
QWEST CORPORATION	9631	BRAINERD	BRNRMNBRDS0	BRAINERD	Non Rural
QWEST CORPORATION	9631	BRAINERD	BRNRMNBRDS0	BRAINERD	Non Rural
QWEST CORPORATION	9631	DETROITLKS	DTLKMNDLDS0	DETROIT LAKES	Non Rural
QWEST CORPORATION	9631	DETROITLKS	DTLKMNDLDS0	DETROIT LAKES	Non Rural
QWEST CORPORATION	9631	BRAINERD	BRNRMNBRDS0	BRAINERD	Non Rural
QWEST CORPORATION	9631	BATTLELAKE	BTLKMNBSARS8	BATTLE LAKE	Non Rural
QWEST CORPORATION	9631	BIWABIK	BWBKMNBIRS8	BIWABIK	Non Rural
QWEST CORPORATION	9631	CLOQUET	CLQTMNCARS8	CLOQUET	Non Rural
QWEST CORPORATION	9631	CLOQUET	CLQTMNCARS8	CLOQUET	Non Rural
QWEST CORPORATION	9631	NASHWAUK	NSHWMNNARS8	NASHWAUK	Non Rural
QWEST CORPORATION	9631	STAPLES	SPLSMNSTRS8	STAPLES	Non Rural
QWEST CORPORATION	9631	MAHNOMEN	MHNMMNMARS9	MAHNOMEN	Non Rural
QWEST CORPORATION	9631	NISSWA	NSSWMNNIRS9	NISSWA	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	WILLMAR	WLMRMNWIDS0	WILLMAR	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	WILLMAR	WLMRMNWIDS0	WILLMAR	Non Rural
QWEST CORPORATION	9631	WILLMAR	WLMRMNWIDS0	WILLMAR	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	SANDSTONE	SNDSMNSARS2	SANDSTONE	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	MONTEVIDEO	MTVDMNMORS2	MONTEVIDEO	Non Rural
QWEST CORPORATION	9631	OGILVIE	OGLVMNOARS2	OGILVIE	Non Rural
QWEST CORPORATION	9631	APPLETON	APPLMNAPRS2	APPLETON	Non Rural
QWEST CORPORATION	9631	SAUKCENTRE	SKCTMNSCRS3	SAUK CENTRE	Non Rural
QWEST CORPORATION	9631	AVON	AVONMNVORS3	AVON	Non Rural
QWEST CORPORATION	9631	RUSH CITY	RSCYMNRCRS3	RUSH CITY	Non Rural
QWEST CORPORATION	9631	ST JOSEPH	STJSMNSJRS3	ST JOSEPH	Non Rural
QWEST CORPORATION	9631	BIRDISLAND	OLIVMNOLRS5	OLIVIA-BIRD ISLAND	Non Rural
QWEST CORPORATION	9631	HINCKLEY	HNCKMNHRS3	HINCKLEY	Non Rural
QWEST CORPORATION	9631	BRAHAM	BRHMMNBRRS3	BRAHAM	Non Rural
QWEST CORPORATION	9631	OLIVIA	OLIVMNOLRS5	OLIVIA-BIRD ISLAND	Non Rural

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QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	SWANVILLE	SWVLMNSVRS5	SWANVILLE	Non Rural
QWEST CORPORATION	9631		NOCLIKNOWN		Non Rural
QWEST CORPORATION	9631	ROYALTON	RYTNMNRNRS5	ROYALTON	Non Rural
QWEST CORPORATION	9631	MORRIS	MRRSMNMORS5	MORRIS	Non Rural
QWEST CORPORATION	9631	LITTLE FLS	LTFMLNFLDS0	LITTLE FALLS	Non Rural
QWEST CORPORATION	9631	PINE CITY	PNCYMNPDS0	PINE CITY	Non Rural
QWEST CORPORATION	9631	LITTLE FLS	LTFMLNFLDS0	LITTLE FALLS	Non Rural
QWEST CORPORATION	9631	GLENWOOD	GLWDMNGLRS6	GLENWOOD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	ST CLOUD	STCDMNT025G	ST CLOUD	Non Rural
QWEST CORPORATION	9631	MORA	MORAMNMORS6	MORA	Non Rural
QWEST CORPORATION	9631	MORA	MORAMNMORS6	MORA	Non Rural
QWEST CORPORATION	9631	COLDSRING	CLSPMNCBRS6	COLD SPRING	Non Rural
QWEST CORPORATION	9631	LITCHFIELD	LTFDMNLIRS6	LITCHFIELD	Non Rural
QWEST CORPORATION	9631	HOLDINGFD	HLFRMNCORS7	HOLDINGFORD	Non Rural
QWEST CORPORATION	9631	ORTONVILLE	ORVLMNORRS8	ORTONVILLE-BIG STO	Non Rural
QWEST CORPORATION	9631	FOLEY	FOLYMFORS9	FOLEY	Non Rural
QWEST CORPORATION	9631	NICOLLET	NCLTMNCRS2	NICOLLET	Non Rural
QWEST CORPORATION	9631	GAYLORD	GYLRMNGARS2	GAYLORD	Non Rural
QWEST CORPORATION	9631	NEW SWEDEN	STPRMNSPDS0	ST PETER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	FARIBAULT	FRBLMNFADS1	FARIBAULT	Non Rural
QWEST CORPORATION	9631	FARIBAULT	FRBLMNFADS1	FARIBAULT	Non Rural
QWEST CORPORATION	9631	FARIBAULT	FRBLMNFADS1	FARIBAULT	Non Rural
QWEST CORPORATION	9631	ALBERT LEA	ALLEMNALDS0	ALBERT LEA	Non Rural
QWEST CORPORATION	9631	ALBERT LEA	ALLEMNALDS0	ALBERT LEA	Non Rural
QWEST CORPORATION	9631	ALBERT LEA	ALLEMNALDS0	ALBERT LEA	Non Rural
QWEST CORPORATION	9631	FARIBAULT	FRBLMNFADS1	FARIBAULT	Non Rural
QWEST CORPORATION	9631	AUSTIN	AUSTMNAB43G	AUSTIN	Non Rural
QWEST CORPORATION	9631	AUSTIN	AUSTMNAB43G	AUSTIN	Non Rural
QWEST CORPORATION	9631	AUSTIN	AUSTMNAB43G	AUSTIN	Non Rural
QWEST CORPORATION	9631	OWATONNA	OWTNMNOW45G	OWATONNA	Non Rural
QWEST CORPORATION	9631	OWATONNA	OWTNMNOW45G	OWATONNA	Non Rural
QWEST CORPORATION	9631	GLENVILLE	GLVLMNGLRS4	GLENVILLE	Non Rural
QWEST CORPORATION	9631	OWATONNA	OWTNMNOW45G	OWATONNA	Non Rural
QWEST CORPORATION	9631	WINONA	WINOMNWI45G	WINONA	Non Rural
QWEST CORPORATION	9631	WINONA	WINOMNWI45G	WINONA	Non Rural
QWEST CORPORATION	9631	WINONA	WINOMNWI45G	WINONA	Non Rural
QWEST CORPORATION	9631	OWATONNA	OWTNMNOW45G	OWATONNA	Non Rural
QWEST CORPORATION	9631	WINONA	WINOMNWI45G	WINONA	Non Rural
QWEST CORPORATION	9631	WINONA	WINOMNWI45G	WINONA	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	MARSHALL	MRSHMNMA53G	MARSHALL	Non Rural
QWEST CORPORATION	9631	STEWARTVL	STVLMNSTRS5	STEWARTVILLE	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural

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QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631	MARSHALL	MRSHMNMA53G	MARSHALL	Non Rural
QWEST CORPORATION	9631	ROCHESTER	ROCHMNRODS0	ROCHESTER	Non Rural
QWEST CORPORATION	9631		NOCLLIKOWN		Non Rural
QWEST CORPORATION	9631	TRACY	TRACMNTRRS6	TRACY	Non Rural
QWEST CORPORATION	9631	REDWOODFLS	RDFLMNRARS6	REDWOOD FALLS-MOI	Non Rural
QWEST CORPORATION	9631	NORTHFIELD	NRFDMMNODS0	NORTHFIELD	Non Rural
QWEST CORPORATION	9631	NORTHFIELD	NRFDMMNODS0	NORTHFIELD	Non Rural
QWEST CORPORATION	9631	NORTHFIELD	NRFDMMNODS0	NORTHFIELD	Non Rural
QWEST CORPORATION	9631	LE SUEUR	LESRMNLSRS6	LE SUEUR	Non Rural
QWEST CORPORATION	9631	MORTON	RDFLMNRARS6	REDWOOD FALLS-MOI	Non Rural
QWEST CORPORATION	9631	CALEDONIA	CLDNMNCARS7	CALEDONIA	Non Rural
QWEST CORPORATION	9631	OWATONNA	OWTNMNOW45G	OWATONNA	Non Rural
QWEST CORPORATION	9631	PIESTONE	PPSTMNPIRS8	PIESTONE	Non Rural
QWEST CORPORATION	9631	WINDOM	WNDMMNWI83G	WINDOM	Non Rural
QWEST CORPORATION	9631	WASECA	WASCMNWADS0	WASECA	Non Rural
QWEST CORPORATION	9631	WASECA	WASCMNWADS0	WASECA	Non Rural
QWEST CORPORATION	9631	NOLAKEPARK	LKPKIACORS8	LAKE PARK	Non Rural
QWEST CORPORATION	9631	JACKSON	JCSNMNJARS8	JACKSON	Non Rural
QWEST CORPORATION	9631	NOSPIRITLK	SPLKIACODS0	SPIRIT LAKE	Non Rural
QWEST CORPORATION	9631	NOESTHERVL	ESVLIACORS3	ESTHERVILLE	Non Rural
QWEST CORPORATION	9631	CHATFIELD	CTFDMNCHRS8	CHATFIELD	Non Rural
QWEST CORPORATION	9631	ST PETER	STPRMNSPDS0	ST PETER	Non Rural
QWEST CORPORATION	9631	ST CHARLES	STCHMNSCRS9	ST CHARLES	Non Rural
QWEST CORPORATION	9631	ST PETER	STPRMNSPDS0	ST PETER	Non Rural
QWEST CORPORATION	9631	ST PETER	STPRMNSPDS0	ST PETER	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT1GT	MNPZ 1	Non Rural
QWEST CORPORATION	9631	TWINCITIES	RCFDMN66DS0	MPLS-66TH ST	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNFS72G	MPLS-FT SNELLING	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNTFDS0	MPLS-24TH AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNBEDS0	MPLS-BEARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNBBD0	MPLS-BRYANT	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNBBD0	MPLS-BRYANT	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMN07DS0	MPLS-7TH AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDTDS7	MPLS-DOWNTOWN-D	Non Rural

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QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPWDMNMADS0	ST PAUL-MAPLEWOOD Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	RED WING	RDWNMNRWDS0	RED WING Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	STILLWATER	STWRMNSTDS0	ST PAUL-STILLWATER Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	WSPLMNWSDS0	ST PAUL-WEST (OAKD) Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMK29G	ST PAUL-MARKET (DIG Non Rural
QWEST CORPORATION	9631	STILLWATER	STWRMNSTDS0	ST PAUL-STILLWATER Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLB45G	EAGAN-LEXINGTON Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	RED WING	RDWNMNRWDS0	RED WING Non Rural
QWEST CORPORATION	9631	RED WING	RDWNMNRWDS0	RED WING Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLB45G	EAGAN-LEXINGTON Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLB45G	EAGAN-LEXINGTON Non Rural
QWEST CORPORATION	9631	TWINCITIES	WBLKMNWBDS0	ST PAUL-WHITE BEAR Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	WBLKMNWBDS0	ST PAUL-WHITE BEAR Non Rural
QWEST CORPORATION	9631	TWINCITIES	WBLKMNWBDS0	ST PAUL-WHITE BEAR Non Rural
QWEST CORPORATION	9631	STILLWATER	STWRMNSTDS0	ST PAUL-STILLWATER Non Rural
QWEST CORPORATION	9631	STCROIXBCH	AFTNMNAFRS4	ST PAUL-AFTON Non Rural
QWEST CORPORATION	9631	STILLWATER	STWRMNSTDS0	ST PAUL-STILLWATER Non Rural
QWEST CORPORATION	9631	TWINCITIES	WSPLMNWSDS0	ST PAUL-WEST (OAKD) Non Rural
QWEST CORPORATION	9631	TWINCITIES	WSPLMNWSDS0	ST PAUL-WEST (OAKD) Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLB45G	EAGAN-LEXINGTON Non Rural
QWEST CORPORATION	9631	TWINCITIES	WSPLMNWSDS0	ST PAUL-WEST (OAKD) Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLB45G	EAGAN-LEXINGTON Non Rural
QWEST CORPORATION	9631	TWINCITIES	WSPLMNWSDS0	ST PAUL-WEST (OAKD) Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLB45G	EAGAN-LEXINGTON Non Rural
QWEST CORPORATION	9631	TWINCITIES	WSPLMNWSDS0	ST PAUL-WEST (OAKD) Non Rural
QWEST CORPORATION	9631	TWINCITIES	CTGVMNCG45G	ST PAUL-COTTAGE GR Non Rural
QWEST CORPORATION	9631	TWINCITIES	CTGVMNCG45G	ST PAUL-COTTAGE GR Non Rural
QWEST CORPORATION	9631	TWINCITIES	FRLKMNFLDS0	ST PAUL-FOREST LAKE Non Rural
QWEST CORPORATION	9631	TWINCITIES	FRLKMNFLDS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNHBS0	ST PAUL-FRONT ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNHBS0	ST PAUL-FRONT ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNHBS0	ST PAUL-FRONT ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNBDS0	ST PAUL-BEECH Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMIDS0	ST PAUL-MIDWAY Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPWDMNMADS0	ST PAUL-MAPLEWOOD Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMIDS0	ST PAUL-MIDWAY Non Rural

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QWEST CORPORATION	9631	TWINCITIES	MPWDMNMADSO	ST PAUL-MAPLEWOOD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	NWBTMNC LDSO	ST PAUL-CLEVELAND	Non Rural
QWEST CORPORATION	9631	TWINCITIES	NSPLMNP RDSO	ST PAUL-PARK ROW	Non Rural
QWEST CORPORATION	9631	TWINCITIES	NSPLMNP RDSO	ST PAUL-PARK ROW	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WBLKMNWBDSO	ST PAUL-WHITE BEAR	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CTGVMNCG45G	ST PAUL-COTTAGE GR	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CTGVMNCG45G	ST PAUL-COTTAGE GR	Non Rural
QWEST CORPORATION	9631	TWINCITIES	NSPLMNP RDSO	ST PAUL-PARK ROW	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNBEDSO	ST PAUL-BEECH	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNBEDSO	ST PAUL-BEECH	Non Rural
QWEST CORPORATION	9631	TWINCITIES	NSPLMNP RDSO	ST PAUL-PARK ROW	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNBEDSO	ST PAUL-BEECH	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNBEDSO	ST PAUL-BEECH	Non Rural
QWEST CORPORATION	9631	TWINCITIES	NSPLMNP RDSO	ST PAUL-PARK ROW	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNBEDSO	ST PAUL-BEECH	Non Rural
QWEST CORPORATION	9631	TWINCITIES	NSPLMNP RDSO	ST PAUL-PARK ROW	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNB LRSO	BLAINE 5ORM	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNB LRSO	BLAINE 5ORM	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNB LRSO	BLAINE 5ORM	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNB LRSO	BLAINE 5ORM	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHVWMNRIDS0	SHOREVIEW-RICE ST	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNB LRSO	BLAINE 5ORM	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNBEDSO	ST PAUL-BEECH	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNB LRSO	BLAINE 5ORM	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRVLMNBURS1	BURNSVILLE RSC	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMKDS4	ST PAUL-MARKET	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRVLMNBURS1	BURNSVILLE RSC	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRVLMNBURS1	BURNSVILLE RSC	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRVLMNBURS1	BURNSVILLE RSC	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRVLMNBURS1	BURNSVILLE RSC	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLB45G	EAGAN-LEXINGTON	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMIDS0	ST PAUL-MIDWAY	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMIDS0	ST PAUL-MIDWAY	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMIDS0	ST PAUL-MIDWAY	Non Rural
QWEST CORPORATION	9631	TWINCITIES	FRLKMNFLDS0	ST PAUL-FOREST LAKE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMIDS0	ST PAUL-MIDWAY	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLB45G	EAGAN-LEXINGTON	Non Rural
QWEST CORPORATION	9631	STCROIXBCH	AFTNMNAFRS4	ST PAUL-AFTON	Non Rural
QWEST CORPORATION	9631	TWINCITIES	STPLMNMIDS0	ST PAUL-MIDWAY	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADSO	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	OKGVMNOGRS7	OAK GROVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	ANOKMNAANDSO	ANOKA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EKRVMNERDSO	MPLS-ELK RIVER	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADSO	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CRYSMNCRDSO	MPLS-CRYSTAL	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADSO	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	PLMOMNFEDSO	MPLS-FERNBROOK	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EKRVMNERDSO	MPLS-ELK RIVER	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNB B52E		Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDSO	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNB BDSO	MPLS-BRYANT	Non Rural
QWEST CORPORATION	9631	TWINCITIES	ANOKMNAANDSO	ANOKA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNPEDS1	MPLS-PENN AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNPEDS1	MPLS-PENN AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNPEDS1	MPLS-PENN AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	PLMOMNFEDSO	MPLS-FERNBROOK	Non Rural
QWEST CORPORATION	9631	PRINCETON	PRTNMNPRRS3	PRINCETON	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADSO	MPLS-WAYZATA	Non Rural

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QWEST CORPORATION	9631	TWINCITIES	BRCTMNBC56G	MPLS-BROOKLYN CEN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	FRDLMNFRDS0	MPLS-FRIDLEY	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNB52E		Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNBDS0	MPLS-BRYANT	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CRYSMNCRDS0	MPLS-CRYSTAL	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	PRINCETON	PRTNMNPRRS3	PRINCETON	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BFLOMNBU1	BUFFALO	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BFLOMNBU1	BUFFALO	Non Rural
QWEST CORPORATION	9631	CAMBRIDGE	CMBRMNCARS6	CAMBRIDGE	Non Rural
QWEST CORPORATION	9631	CAMBRIDGE	CMBRMNCARS6	CAMBRIDGE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	PLMOMNFEDS0	MPLS-FERNBROOK	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNGEDS0	MPLS-CENTRAL AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	ANOKMNANDS0	ANOKA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	PLMOMNFEDS0	MPLS-FERNBROOK	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	OKGVMNOGRS7	OAK GROVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CNRPMNNDSD0	MPLS-COON RAPIDS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CNRPMNNDSD0	MPLS-COON RAPIDS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CNRPMNNDSD0	MPLS-COON RAPIDS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CNRPMNNDSD0	MPLS-COON RAPIDS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CNRPMNNDSD0	MPLS-COON RAPIDS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNGEDS0	MPLS-CENTRAL AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNGEDS0	MPLS-CENTRAL AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNGEDS0	MPLS-CENTRAL AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNGEDS0	MPLS-CENTRAL AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CNRPMNNDSD0	MPLS-COON RAPIDS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRCTMNBCRS0	MPLS-BROOKLYN CTR	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLANMNBLS0	BLAINE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	CRYSMNCRDS0	MPLS-CRYSTAL	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHKPMNSHDS2	SHAKOPEE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	HPKNMNHODS0	MPLS-HOPKINS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNBEDS0	MPLS-BEARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNGPDS0	MPLS-GLEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNSODS0	BLOOMINGTON-SOUT	Non Rural
QWEST CORPORATION	9631	TWINCITIES	HPKNMNHODS0	MPLS-HOPKINS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	HPKNMNHODS0	MPLS-HOPKINS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNPEDS1	MPLS-PENN AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNPEDS1	MPLS-PENN AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EXCLMNEX47G	MPLS-EXCELSIOR	Non Rural

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QWEST CORPORATION	9631	TWINCITIES	MPLSMNPEDS1	MPLS-PENN AVE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EXCLMNEX47G	MPLS-EXCELSIOR	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHKPMNSHDS2	SHAKOPEE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHKPMNSHDS2	SHAKOPEE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHKPMNSHDS2	SHAKOPEE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNEP94G	MPLS-EDEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHKPMNSHDS2	SHAKOPEE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EXCLMNEX47G	MPLS-EXCELSIOR	Non Rural
QWEST CORPORATION	9631	TWINCITIES	NVRRMNNARS4	MPLS-NAVARRRE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EXCLMNEX47G	MPLS-EXCELSIOR	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	SHKPMNSHDS2	SHAKOPEE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNGPDS0	MPLS-GLEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EAGNMNLBRS4	EAGAN-LEXINGTON R5	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNSODS0	BLOOMINGTON-SOUT	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRVLMNBU89G	MPLS-BURNSVILLE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRVLMNBU89G	MPLS-BURNSVILLE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	WYZTMNWADS0	MPLS-WAYZATA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	GLVYMNORDS0	MPLS-ORCHARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNNODS0	BLTN-NORMANDALE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BRVLMNBU89G	MPLS-BURNSVILLE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNCEDS0	BLOOMINGTON-CEDA	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNNODS0	BLTN-NORMANDALE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNEP94G	MPLS-EDEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNEP94G	MPLS-EDEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNEP94G	MPLS-EDEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNNODS0		Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNNODS0	BLTN-NORMANDALE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNNODS0	BLTN-NORMANDALE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNEP94G	MPLS-EDEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNNODS0	BLTN-NORMANDALE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNBEDS0	MPLS-BEARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNNODS0	BLTN-NORMANDALE	Non Rural

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QWEST CORPORATION	9631	TWINCITIES	EDPRMNGPDS0	MPLS-GLEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNNORSA	BLTN-NORMANDALE I	Non Rural
QWEST CORPORATION	9631	TWINCITIES	BLTNMNSODS0	BLOOMINGTON-SOUT	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNGPDS0	MPLS-GLEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNGPDS0	MPLS-GLEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNBEDS0	MPLS-BEARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	HPKNMNHODS0	MPLS-HOPKINS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNEP94G	MPLS-EDEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	HPKNMNHODS0	MPLS-HOPKINS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	HPKNMNHODS0	MPLS-HOPKINS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNDT62G	MPLS-DOWNTOWN	Non Rural
QWEST CORPORATION	9631	TWINCITIES	HPKNMNHODS0	MPLS-HOPKINS	Non Rural
QWEST CORPORATION	9631	TWINCITIES	MPLSMNBEDS0	MPLS-BEARD	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNEP94G	MPLS-EDEN PRAIRIE	Non Rural
QWEST CORPORATION	9631	TWINCITIES	EDPRMNEP94G	MPLS-EDEN PRAIRIE	Non Rural
SPRINT SPECTRUM L.P.	6664	FERGUS FLS	FRFLMNF80MD		Non Rural
SPRINT SPECTRUM L.P.	6664	EGRNDFORKS	EGFKMNAC5MD		Non Rural
SPRINT SPECTRUM L.P.	6664	HIBBING	DLTHMNAT5MD		Non Rural
SPRINT SPECTRUM L.P.	6664	BEMIDJI	WADNMNWA0MD		Non Rural
SPRINT SPECTRUM L.P.	6664	GRAND RPDS	DLTHMNF3MD		Non Rural
SPRINT SPECTRUM L.P.	6664	DETROITLKS	MRHDMNFS8MD		Non Rural
SPRINT SPECTRUM L.P.	6664	VIRGINIA	DLTHMNAT5MD		Non Rural
SPRINT SPECTRUM L.P.	6664	BRAINERD	BRNRMNB80MD		Non Rural
SPRINT SPECTRUM L.P.	6664	GRAND RPDS	DLTHMNEH7MD		Non Rural
SPRINT SPECTRUM L.P.	6664	DULUTH	DLTHMNEH7MD		Non Rural
SPRINT SPECTRUM L.P.	6664	MOORHEAD	MRHDMNFS8MD		Non Rural
SPRINT SPECTRUM L.P.	6664	BRAINERD	BRNRMNXA1MD		Non Rural
SPRINT SPECTRUM L.P.	6664	WADENA	WADNMNWA0MD		Non Rural
SPRINT SPECTRUM L.P.	6664	DULUTH	DLTHMNF3MD		Non Rural
SPRINT SPECTRUM L.P.	6664	DETROITLKS	WADNMNWA6MD		Non Rural
SPRINT SPECTRUM L.P.	6664	FERGUS FLS	FRFLMNF1MD		Non Rural
SPRINT SPECTRUM L.P.	6664	CARLTON	DLTHMNF3MD		Non Rural
SPRINT SPECTRUM L.P.	6664	BRAINERD	BRNRMNXA1MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ST CLOUD	STCDMNAT7MD		Non Rural
SPRINT SPECTRUM L.P.	6664	LITTLE FLS	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	WILLMAR	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	HINCKLEY	MPLSMNDTX0X		Non Rural
SPRINT SPECTRUM L.P.	6664	ST CLOUD	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	WILLMAR	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	HUTCHINSON	HTSNMNAE0MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ALEXANDRIA	STCDMNAT0MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ST CLOUD	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	HINCKLEY	MPLSMNDTX0X		Non Rural
SPRINT SPECTRUM L.P.	6664	LITTLE FLS	STCDMNAT7MD		Non Rural
SPRINT SPECTRUM L.P.	6664	LITTLE FLS	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	ALEXANDRIA	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	ST CLOUD	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	ST CLOUD	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	MORA	MPLSMNDTX0X		Non Rural
SPRINT SPECTRUM L.P.	6664	ST CLOUD	STCDMNAT7MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ROCHESTER	ROCHMNH9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	NEW ULM	WNDMMNAC5MD		Non Rural
SPRINT SPECTRUM L.P.	6664	AUSTIN	OWTNMNAM9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	FARIBAULT	OWTNMNAM8MD		Non Rural
SPRINT SPECTRUM L.P.	6664	NORTHFIELD	OWTNMNOW3MD		Non Rural
SPRINT SPECTRUM L.P.	6664	CANNON FLS	OWTNMNOW3MD		Non Rural
SPRINT SPECTRUM L.P.	6664	WINONA	ROCHMNH9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	WINONA	WINOMNRF3MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ALBERT LEA	OWTNMNAM9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	WORTHINGTON	WNDMMNAC5MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ROCHESTER	ROCHMNH8MD		Non Rural
SPRINT SPECTRUM L.P.	6664	OWATONNA	OWTNMNAM9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	MANKATO	MNKTMNXM2MD		Non Rural

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SPRINT SPECTRUM L.P.	6664	ROCHESTER	ROCHMNH8MD		Non Rural
SPRINT SPECTRUM L.P.	6664	FAIRMONT	OWTNMNM9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	MARSHALL	WNDMMNAC5MD		Non Rural
SPRINT SPECTRUM L.P.	6664	NORTHFIELD	OWTNMNOW3MD		Non Rural
SPRINT SPECTRUM L.P.	6664	FARIBAULT	OWTNMNM9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	OWATONNA	OWTNMNM9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	NEW ULM	WNDMMNW10MD		Non Rural
SPRINT SPECTRUM L.P.	6664	AUSTIN	OWTNMNMAMX0X		Non Rural
SPRINT SPECTRUM L.P.	6664	MANKATO	MNTKMNXM4MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ALBERT LEA	OWTNMNMAMX0X		Non Rural
SPRINT SPECTRUM L.P.	6664	FARIBAULT	OWTNMNM9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	MANKATO	MNKTMNXM2MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ROCHESTER	STCDMNUCCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	STEWARTVL	ROCHMNH9MD		Non Rural
SPRINT SPECTRUM L.P.	6664	ROCHESTER	ROCHMNH8MD		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCD1KD		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCD1KD		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM4		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM1		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCD1KD		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0	MINNEAPOLIS	Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM1KD		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNDCM0		Non Rural

Minnesota ETC Designated Service Areas

SPRINT SPECTRUM L.P.	6664	OSSEO	MPLSMNCDCM1	Non Rural
SPRINT SPECTRUM L.P.	6664	OSSEO	MPLSMNCDCM1	Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCDCM1	Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCD1KD	Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCDCM0	Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCDCM1	Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCD1KD	Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCDCM0	Non Rural
SPRINT SPECTRUM L.P.	6664	TWINCITIES	MPLSMNCDCM1	Non Rural

Exhibit 5

Key Personnel

Assist Wireless Key Personnel

Executive Management

Byron T. Young, CEO

Mr. Young shares the responsibility of establishing the growth strategy and overseeing the business's marketing and strategic partnerships as well as managing the technology required to operate in a very complicated technology-based organization. Byron's focus is compliance, wireless network planning, operating systems, business development, and competitive market strategy planning. Mr. Young has a great deal of corporate financing experience as well as shareholder relations for private and public companies. Mr. Young has served as a member and as Chairman on several Boards of Directors of both public and private companies.

Young Energy, LLC, was founded in January of 2004 and provides postpaid and prepaid electricity services to residential and commercial customers in the state of Texas. Mr. Young currently serves as senior advisor and board member to Young Energy, LLC.

Mr. Young has founded several other technology-based companies engaged in retail telecommunications. He founded New Talk, Inc., a facilities-based CLEC in Texas. Mr. Young founded Extel Enterprises, Inc. in 1996 and operated it successfully until purchased by a Usurf in 2004.

In 1994 Mr. Young founded Paging Express, Inc. which operated profitably during the peak of paging services. Mr. Young founded Discount Paging and Cellular in 1992 operated it until 1994.

David B. Dorwart, Chairman

An accomplished, multi-faceted executive with an unusual blend of Leadership, Sales and Operational experience spanning over 27 years.

In 1998, Mr. Dorwart founded dPi Teleconnect, LLC, a telecommunications company that focused on providing prepaid services to credit- and cash-constrained consumers. In 2010, Mr. Dorwart founded Acacia Energy, LLC, an energy company that focuses on customers that are credit and cash constrained. In 2007, Mr. Dorwart founded PayGO Distributors, LLC, a company that focuses on marketing to prepaid and lifeline customers in multiple utility industries.

Additionally, Mr. Dorwart has been involved in the management of several other companies, including

- AdvantEDGE Quality Cars, Division General Manager:
- Strategic Initiatives, Vice President
- Remco Americas, Division Vice President

Leadership Team

J.D. Hilzendager

J.D. Hilzendager is the Executive Vice-President & General Manager of Assist Wireless. Mr. Hilzendager brings over 14 years wireless experience to Assist Wireless. Mr. Hilzendager was the recipient of the AT&T Summit Award in 2015 and was a Verizon Wireless Winner's Circle recipient 3 times. Mr. Hilzendager is a graduate of the University of North Texas and enjoys volunteering for the Dallas Area Habitat for Humanity.

Darrin Lewis

Darrin Lewis is the Vice President of Supply Chain Management. Mr. Lewis has just over three years of wireless/telecom experience. During those three years, he has worked for Assist Wireless. Before he was a VP with Supply Chain Management, he worked at an Assist Wireless retail store in Oklahoma. Mr. Lewis also has 29 years of regulatory compliance experience. Darrin Lewis also gives back to the community by helping others in need. Mr. Lewis volunteered for Red Cross during catastrophes and is also a Habitat for Humanity volunteer.

Kelly King

Kelly King is the Vice President of Regulatory Affairs & Quality Management for Assist Wireless. Kelly King has fifteen years of wireless/telecom experience and has been with Assist Wireless for three of those years. Kelly King also has fifteen years of Regulatory Compliance experience.

Domenic Fontana

Domenic Fontana is the Vice President of Finance for Assist Wireless. Mr. Fontana has ten years of wireless/telecom experience, and has been with Assist Wireless for one and a half of those years. Domenic Fontana has been a board member for his home association for two years, and he and his wife are also heavily involved in volunteer work around their community.

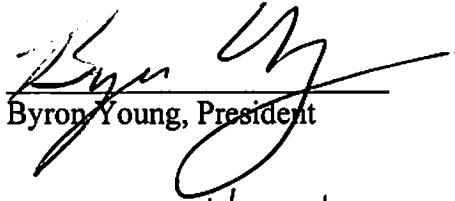
Exhibit 6

Verification

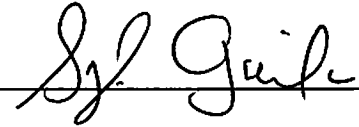
VERIFICATION

STATE OF)
)
COUNTY OF TARRANT)

I, Byron Young, being first duly sworn upon oath, depose and say that I am the President of Assist Wireless, Inc., and as such am authorized to make this verification on its behalf; that I have read the foregoing Petition; that I know the contents thereof; and that the facts set forth in the foregoing Petition are true and correct to the best of my knowledge, information and belief.


Byron Young, President

Subscribed and sworn to before me this 15 day of March, 2017.

Notary Public 

My Commission expires: September 6, 2017

