

April 19<sup>th</sup>, 2021

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place, Suite 350  
St. Paul, MN 55101-2147

Re: In the Matter of the Minnesota Public Utilities Information Request sent to all Rural  
Digital Opportunity Fund (RDOF) Grant Winners

Dear Mr. Seuffert:

Attached please find Consolidated Telephone Company response to the Minnesota Public Utilities  
Commission information request which is filed in Docket No. P406/AM-21-62.

Please contact the undersigned if further information is needed at 651-621-8306.

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley  
Consultant for Consolidated Telephone Company

**Additional Information Requested from ETC Petitioners**

ETC Applicant Name: Consolidated Telephone Company		
MPUC Docket Number: P406/AM-21-62		
	Yes (Certify)/ No	Additional Information (Attach additional pages as necessary)
1. Please certify the applicant's commitment to meeting the service and performance quality requirements applicable to its support type. See 47 C.F.R. § 54.202(a)(1).	YES	Consolidated Telephone Company ("CTC") certifies that it will comply with the service requirements applicable to the support that it receives.
2. Will the applicant offer standalone voice telephony service? See 47 CFR 54.101(b). Applicants holding an ETC designation in MN should describe, in sufficient detail to understand the offering, their existing voice telephony service offered to customers, including tariff sheets and contracts, proof of making offerings for this service to consumers in their existing census blocks covered by their present ETC designation, and the number of customers using the applicant's offered voice telephony service in both total numbers and as a percent of customers served in the state. Indicate whether the offering for the RDOF census blocks covered by this application will be the same standalone service and if not, describe how it will differ. See 47 CFR 54.101 (b).	YES.	Please see CTC RDOF ETC application, specifically Exhibit 2 page 12. This page is a copy of the current CTC MN Intrastate Tariff and it lists the standalone residential local service rates.  As of March 2021, CTC had 7,153 voice customers. This number of voice customers represents 49% of its total customers.  Customers in the RDOF areas will be offered standalone voice service at the rates listed in CTC's MN Tariff.

<p>3. If so, will the applicant do so through its own facilities, meaning "any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support" or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier)? See 47 CFR 54.201(d)(l).</p>	<p>YES</p>	<p>CTC will offer services in its RDOF Census blocks using its own facilities except for 2 census blocks. In census blocks: 270359507002 &amp; 270359508001 CTC in combination with its own facilities will lease FTTH facilities.</p>
<p>4. For the voice telephony service, identify the customer point of contact (name, address, contact information), and confirm this contact person is legally authorized to represent the applicant in communications with customers.</p>	<p>YES</p>	<p>Andrew Isackson, Director of Member Operations, 1102 Madison Street, PO Box 972, Brainerd, MN 56401, 218-454-1205, and andy@gotc.com</p>
<p>5. Does the voice telephony service have "access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems"? See 47 CFR § 54.101 (a).</p>	<p>YES</p>	<p>CTC's Voice service includes access to E911 dialing.</p>
<p>6. Please describe how the applicant will remain functional in emergency situations, namely, what is "its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations." 47 CFR § 54.202(a)(2)?</p>	<p>YES</p>	<p>See CTC Attachment 1.</p>
<p>7. Please describe the extent to which the offered voice telephony services will be offered at "rates that are equal or lower to the Commission's reasonable comparability benchmarks for fixed wireline services offered in urban areas." 47 CFR 54.804(b)(2)(iii).</p>	<p>YES</p>	<p>The local exchange rates offered by CTC are in the range of the announced FCC 2021 Annual Urban Rate Survey Rates.  The 2021 Annual urban rate survey for an unlimited or flat rate local service average rate is \$33.73. The reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$54.75</p>
<p>8. Will the applicant satisfy additional requirements applicable to all high-cost ETCs, such as Lifeline obligations 47 CFR § 54.405</p>	<p>YES</p>	<p>CTC will make available Lifeline Service to qualifying customers.</p>

<p>9. If so, will the applicant commit to e-file documentation evidencing the offering of Lifeline service in the required census blocks as required by 47 CFR § 54.405(b).</p> <p>a. Current Lifeline providers should provide evidence of prior and current communications, including advertisements and website communications as described in 47 CFR § 54.405(c) for census blocks for which it currently receives support and the number of Lifeline customers being served.</p> <p>b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c).</p>	<p>YES</p>	<p>CTC provided samples of its existing Lifeline advertising in MN PUC Docket No. 20-747. CTC advertises lifeline on its website, in a yearly notice to all customers and in its quarterly newsletters. CTC's response in Docket No. 20-747 is attached.</p>
<p>10. If the answer to question 3 above is through an affiliate or by offering a managed voice solution (including VoIP) through resale of another carrier's services, identify the other carrier, describe the legal relationship between the applicant and the other carrier, and describe how the other carrier will comply with the requirements listed above.</p>	<p>YES</p>	<p>CTC will be using its facilities along with the leasing of FTTH facilities from Mille Lacs Electric Cooperative to serve the two census blocks mentioned in Section 3.</p> <p>CTC and Mile Lacs Electric Cooperative are separate legal entities and are not related in any way. CTC will lease these facilities under a contract with Mille Lacs Electric Cooperative.</p>
<p>11. Will the applicant commit to notifying the Minnesota Public Utilities Commission, Minnesota Department of Commerce and the Minnesota Office of the Attorney General if it has failed to meet its milestones for the identified census blocks under the FCC ROOF grant obligations? 47 CFR 54.320(d).</p>	<p>YES</p>	<p>CTC will notify the Minnesota Public Utilities Commission, Minnesota Department of Commerce, Minnesota Attorney General Office, USAC and the FCC within 10 business days after the applicable deadline if it has failed to meet a build-out milestone</p>

Attachment 1 – Response to Section 6 of MN PUC Information Request  
From CTC's 481 Filing in 2020

Page 1 of 1

SAC: 361373  
State: MN  
Consolidated Tel Co  
Form 481 Line No. 610 Description of Functionality in Emergency Situations

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Consolidated Tel Co pursuant to MN Rule "7810.390 Emergency Operations" has:

- Established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide:
  - A minimum of four hours of battery service in each central office.
  - A permanently installed power unit in exchanges exceeding 5000 lines.
  - Mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.
  
- Has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.

November 4<sup>th</sup>, 2020

Mr. William Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

Re: Response to Minnesota Public Utilities Commission Request for Information in Docket No. 20-747

Dear Mr. Seuffert:

Enclosed please find the Initial Comments for Consolidated Telephone Company d/b/a CTC as a High Cost ETC in Docket No. P999/CI-20-747.

Please call me at 651-621-8306 with any questions.

Sincerely,

*/s/ Mary T. Buley*

Mary T. Buley  
Telecommunications Consultant

Enclosure

cc: Andy Isackson, CTC

## 2020 MARKETING ACTIVITIES **LIFELINE ASSISTANCE**

Initial Comments for CTC as a High Cost ETC in Minnesota PUC Docket No. P999/CI-20-747

1. Current number of CTC Lifeline Customers as of 11/01/2020
  - a. 54 Lifeline customers
2. How Lifeline Services Are Advertised:
  - a. CTC advertises Lifeline and TAP on our website - with links to information both in English and Spanish. <https://www.goctc.com/additionalresources/assistance/>
  - b. In addition, CTC advertises Lifeline services annually as a bill message in customer invoices
  - c. Quarterly digital newsletters
  - d. Verbally to customers through our member service representatives.
3. Provided samples of Lifeline Advertising:
  - a. Page two of this document shows specific examples of how we communicate the Lifeline Program. Included are images from our quarterly newsletters, our annual bill message, and a screen shot from our website.
4. No comments

## 2020 MARKETING ACTIVITIES **LIFELINE ASSISTANCE**

### Digital Digest (eNewsletter): Spring 2020

Wed 5/20/2020 7:30 AM  
 CTC <enews@goctc.com>  
 Digital Digest - Spring 2020

problems with how this message is displayed, click here to view it in a web browser.

mount and connects to your car's speakers via auxiliary input or your phone's Bluetooth. (Not compatible with all cars and phones.)  
**Learn more at [www.goctc.com/smartlounge](http://www.goctc.com/smartlounge), then visit our Facebook page to enter for a chance to win an Echo Auto!**

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**MEMBER MENTIONS**

Just received internet and the experience getting to this point has been awesome!  
 Communication with CTC sales, temp wiring provider and the CTC technician has been excellent.  
 I would rate the communication and service very high from all aspects of the process so far.  
 - ION P. BRAINERD

>> LEAVE US A REVIEW!

**>> Facing hardships due to COVID-19? Contact us to discuss options.  
 >> Looking for financial or service assistance?  
 >> Save \$\$ with internet-only options. No phone line required!**

### Digital Digest (eNewsletter): Summer 2020

Fri 9/18/2020 1:06 PM  
 CTC <enews@goctc.com>  
 Digital Digest - Summer 2020

problems with how this message is displayed, click here to view it in a web browser.

>> LEAVE US A REVIEW!

**811**  
**Know what's below. Call before you dig.**

**REMINDER!**  
 Be sure to dial 811 before you dig in your yard, ditch, by the lake, or anywhere this fall! You can also submit a ticket online via [gopherstateonecall.org](http://gopherstateonecall.org). Planning a Saturday project? Be sure to contact them by Wednesday at 5pm. It's the law and it keeps everyone safe, services running, and utilities working.

>> Facing hardships due to COVID-19? Contact us to discuss options.  
 >> Looking for financial or service assistance?

218-454-1234 | [goctc.com](http://goctc.com)

### Bill Message - August, 2020

**Having trouble paying your telephone bill?**

If you are a low-income household or are enrolled in government programs, like SNAP or Medical Assistance, you qualify!

**Contact us about the Telephone Assistance Plan discount. 218-454-1234**

**Website:** <https://www.goctc.com/additionalresources/assistance/>

Assistance - Go CTC

[goctc.com/additionalresources/assistance/](https://www.goctc.com/additionalresources/assistance/)

Services Business Partnerships About CTC Contact Us Help

**ASSISTANCE PROGRAMS.**

**MINNESOTA TELEPHONE ASSISTANCE PLAN (TAP) & LIFELINE**

If you are behind on paying your bills, you may be eligible for assistance through Minnesota's TAP program and/or through the federal Lifeline program, which both provide a monthly credit on telephone bills. Lifeline recipients will be automatically enrolled in the TAP program as required by Minnesota law and applicable Commission Orders.

For more information and to see if you are eligible for either program, click the links below.

**TAP Information & Application**  
**Lifeline Information & Application**  
**Lifeline Information & Application (En Espanol)**