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March 6, 2014

Dr. Burl W. Haar
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101-2147

Via: E-File

Re: In the Matter of the Farmers Mutual Telephone Company Complaint Against Frontier
Communications of Minnesota, Inc. re Early Termination Fees
Docket No. P-522, 405/C-13-941

Dear Dr. Haar:

I enclose via e-filing in the above-referenced docket Reply Comments of Farmers Mutual Telephone Company and an Affidavit of Service.

Please contact me if you have any questions.

Sincerely,

/s/Gregory R. Merz

Gregory Merz

GRM/akm
Enclosures

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-941_C-13-941
Robert E.	Cattanach	cattanach.robert@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_13-941_C-13-941
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_13-941_C-13-941
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-941_C-13-941
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-941_C-13-941
Gregory R.	Merz	gregory.merz@gpmlaw.com	Gray, Plant, Mooty	80 S 8th St Ste 500 Minneapolis, MN 55402-5383	Electronic Service	No	OFF_SL_13-941_C-13-941
Kevin	Saville	kevin.saville@fr.com	Citizens/Frontier Communications	2378 Wilshire Blvd. Mound, MN 55364	Electronic Service	No	OFF_SL_13-941_C-13-941

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

In The Matter Of The Farmers Mutual Telephone Company Complaint Against Frontier Communications of Minnesota, Inc. re Early Termination Fees	Docket No. P-522, 405/C-13-941
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REPLY COMMENTS OF FARMERS MUTUAL TELEPHONE CO.

Farmers Mutual Telephone Co. respectfully submits these reply comments pursuant to the Commissioner's January 30, 2014, Order Finding Jurisdiction, Finding Grounds to Investigate, and Requiring Answer.

In initial comments submitted by Frontier Communications of Minnesota, Inc. ("Frontier") in response to the Commission's Order Finding Jurisdiction, Frontier argued, for the third time, that the Commission's jurisdiction to address the issue raised by Farmer's Verified Complaint is extremely limited. Farmers has already, in previous comments, responded fully to Frontier's argument regarding jurisdiction and will not repeat that discussion here. *See* Comments of Farmers Mutual Telephone Co. in Response to Motion to Dismiss, filed November 22, 2013; Comments of Farmers Mutual Telephone Co. in Response to Petition for Reconsideration, filed February 19, 2014. Suffice it to say that Frontier's most recent comments do not offer any new evidence or arguments that should cause the Commission to in any way modify its previous Order regarding jurisdiction.

Frontier states that it "believes that its Motion for Reconsideration stays the time to answer Farmers' Complaint. Frontier Initial Comments at p. 6. Frontier does not identify any

Commission rule or legal authority in support of that belief. In fact, the Commission's rules provide that the Commission "may vacate or stay the order, or part of the order, that is the subject of the petition [for reconsideration] pending action on the petition." Minn. R. part 7829.3000, subd. 6. Pursuant to this rule, the filing of a petition for reconsideration does not, by itself, stay the effect of the order that is the subject of the petition; rather, the Commission must take some affirmative action to stay the effect of its order. Here, Frontier did not request a stay and the Commission has not ordered one.

Finally, Frontier asserts that, to the extent the Commission continues its investigation, the matter should be referred to the Office of Administrative Hearings. Farmers agrees and requests that this matter be referred without further delay to the Office of Administrative Hearings to develop the record on all disputed issues of fact arising from Farmers' Verified Complaint. The time for Frontier to answer the Verified Complaint having now expired, this matter may be referred to the OAH without providing Frontier with a further opportunity to answer.

Dated: March 6, 2014

GRAY, PLANT, MOOTY, MOOTY
& BENNETT

By: /s/Gregory R. Merz

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