

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Petition of CenturyLink QC
to be Regulated Pursuant to Minn. Stat.
§ 237.025: Competitive Market Regulation

ISSUE DATE: November 2, 2016

DOCKET NO. P-421/AM-16-496

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DOCKET NO. P-421/AM-16-547

ORDER REQUIRING FURTHER
FILINGS AND INITIATING EXPEDITED
PROCEEDING

PROCEDURAL HISTORY

On June 30, 2016, Qwest Corporation d/b/a CenturyLink QC (CenturyLink) filed a petition to be regulated under newly enacted legislation, Minn. Stat. §237.025. The petition included a request for deregulation in each of the company’s 108 Minnesota exchange service areas, stating that in each area, CenturyLink serves fewer than 50 percent of households, and unaffiliated competitors offer service to at least 60 percent of households. If the petition is approved, CenturyLink will be authorized to operate as a competitive local exchange carrier (CLEC).

On August 15, 2016, the Office of the Attorney General – Residential Utilities and Antitrust Division (OAG) filed comments objecting to CenturyLink’s petition, arguing that the petition is incomplete and recommending that the Commission require CenturyLink to file additional information to enable parties to evaluate the merits of the petition.

On August 15, 2016, the Department of Commerce (the Department) filed comments objecting to the petition, stating that the petition is incomplete and recommending that the Commission require CenturyLink to supplement its petition with technical information and that the Commission then establish a process to address the merits of the petition.

On August 29, 2016, CenturyLink filed reply comments recommending that the Commission find the petition complete and find that the statutory deadline for reaching a final decision is December 27, 2016.

On August 29, 2016, the Department and the OAG each filed reply comments reiterating their initial positions that the petition is incomplete, that CenturyLink should be required to file information to ensure that the initial filing requirements are met, and that a process for examining the merits of the petition should be established once the Commission determines that the petition is complete.

On August 29, 2016, the Legal Services Advocacy Project (LSAP) filed reply comments recommending that the Commission apply the new statute to require that any carrier authorized to operate under the statute must continue providing basic local service.

On September 9, 2016, the Commission issued an order approving a protective order to facilitate the disclosure of competitively sensitive information and found that Minn. Stat. § 237.025 requires the Commission to make a final decision on the petition within 180 days of the date all information required of CenturyLink under subdivision 2 of the statute is filed.

On September 13, 2016, the petition came before the Commission.

FINDINGS AND CONCLUSIONS

I. Background

In May 2016, the Legislature amended Minn. Stat. Ch. 237 to authorize a telephone company to petition the Commission to operate under a new form of regulation called competitive market regulation.¹ Under the statute, Minn. Stat. § 237.025, a telephone company, or local exchange carrier, may petition the Commission to operate as a *competitive* local exchange carrier, subject to reduced regulatory oversight and minimal rate restrictions.

To be eligible, a petitioning local exchange carrier must demonstrate the presence of competition in either one of two ways under subdivision 4 of the statute, which reads as follows:

Subd. 4. Competitive Criteria.

The commission shall approve a petition under this section if a petitioning local exchange carrier demonstrates to the commission's satisfaction that:

- (1) it serves fewer than 50 percent of the households in an exchange service area, and at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider; or
- (2) it serves more than 50 percent of the households in an exchange service area, and:
 - (i) at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider;
 - (ii) no significant economic, technological, or other barriers to market entry and exit exist;
 - (iii) no single provider has the ability to maintain prices above competitive levels for a significant period of time or otherwise deter competition; and
 - (iv) the petitioning local exchange carrier will continue to offer basic local service, as defined in subdivision 8, consistent with its tariffs in effect at the time of its petition.

A petitioning carrier must file all the information required under subdivision 2(b) of the statute, which states:

¹ Laws of Minnesota 2016, Chapter 115, section 4.

Subd. 2. Petition.

(b) A petition filed under this subdivision must include:

- (1) a list of exchange service areas in which the local exchange carrier is seeking to be regulated under this section;
- (2) the local services offered by the local exchange carrier in each exchange service area;
- (3) a list of competitive service providers in each exchange service area;
- (4) a description of affiliate relationships the petitioning local exchange carrier has with any provider of local service in each exchange service area;
- (5) documentation demonstrating the local exchange carrier's loss of local voice service customers to unaffiliated competitive service providers in each exchange service area over, at a minimum, the previous five years;
- (6) evidence demonstrating that the local exchange carrier satisfies the competitive criteria under subdivision 4 in each exchange service area; and
- (7) other information requested by the commission that is relevant to the applicable competitive criteria under subdivision 4.

If no party objects to the petition within 45 days of the filing, the petition is automatically approved under the statute.² If a party does object to the petition, the Commission must provide the parties an opportunity to comment on the merits of the application and must make a final decision on the petition within 180 days of the date the information required above is filed.³

A carrier authorized to operate under the competitive market regulation statute will be regulated as a telecommunications carrier under Minn. Stat. § 237.035, and as a competitive local exchange carrier (CLEC) under Minn. R. 7811.2210 and 7812.2210.⁴ The prices of a CLEC “are not subject to any rate or price regulation” unless, the Commission, upon a complaint, determines that a rate is unreasonably restrictive or discriminatory, is deceptive, impedes competition, or will result in substantial customer harm.⁵

CenturyLink currently operates as a telephone company providing local exchange service to customers under the authority of an alternative regulation plan (also called an alternative form of regulation plan, or AFOR). These plans offer price flexibility to the companies in lieu of traditional rate-of-return regulation.⁶ And approval of an AFOR is contingent upon the plan containing a service quality plan, justifying the reduced level of rate regulation.⁷ On June 12, 2013, CenturyLink filed a request to extend its existing AFOR for three years; on November 20, 2013, the Commission approved the extension through December 31, 2016.⁸

² Minn. Stat. § 237.025, subd. 3(c).

³ Minn. Stat. § 237.025, subd. 3 (d) and (e).

⁴ Minn. Stat. § 237.025, subd. 6.

⁵ Minn. R. 7812.2210.

⁶ Minn. Stat. § 237.761.

⁷ Minn. Stat. § 237.765 (a).

⁸ See *In the Matter of Extending CenturyLink's Second Revised Alternative Form of Regulation Plan*, Docket No. P-421/AR-13-498, Order Approving Extension of Second Revised Alternative Form of Regulation Plan (November 20, 2013).

The new competitive market regulation statute sets forth the process for deregulating the rates of a carrier, such as CenturyLink. Under the statute, a newly authorized CLEC is initially precluded from increasing rates for basic local service (for residential customers and business customers subscribing to three or fewer lines) before January 1, 2018.⁹

Between years 2018 and 2022, the basic local service rate may not increase on a per month basis by more than \$2.00, and until December 31, 2022, rates may not exceed \$25.00.¹⁰ Thereafter, basic local service rates “may not be increased on a per month basis by more than \$2.00” and “any rate established must remain in effect for a minimum of 12 months.”¹¹ After January 1, 2023, a rate change is deemed approved 90 days after the Commission receives notice of the change.¹²

The Commission may subsequently reexamine whether the competitive criteria continue to be met and may determine the appropriate level of regulation for a carrier no longer meeting the competitive requirements of the statute.¹³

II. Summary of CenturyLink’s Petition

CenturyLink is the first local exchange carrier to file a petition under the new statute, requesting that the Commission authorize the company to operate as a CLEC. CenturyLink claimed that it qualifies under subdivision 4(1) of the statute, as follows:

Subd. 4. Competitive Criteria.

The commission shall approve a petition under this section if a petitioning local exchange carrier demonstrates to the commission's satisfaction that:

- (1) it serves fewer than 50 percent of the households in an exchange service area, and at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider;

The company stated that the petition contains all the information required under subdivision 2 of the statute and that based on the information filed, it has met its burden to show that in each of its 108 Minnesota exchange service areas, the company serves fewer than 50 percent of households and that at least 60 percent of households can choose voice service from at least one unaffiliated competitor service provider.¹⁴

Further, CenturyLink stated that based on its June 30, 2016 filing date, the Commission’s final decision, which is due within 180 days of the filing, must be made by December 27, 2016.

⁹ Minn. Stat. § 237.025, subd. 8 (b) (1).

¹⁰ Minn. Stat. § 237.025, subd. 8 (b) (2).

¹¹ Minn. Stat. § 237.025, subd. 8 (b) (3).

¹² *Id.*

¹³ Minn. Stat. § 237.025, subd. 11.

¹⁴ CenturyLink stated that there is one exchange service area in which the percentage is 59.6 percent.

III. Summary of Objections

Both the Department and the OAG filed objections to the petition, triggering Commission review of the company's proposal; the statute deems the petition approved if no party objects to the proposal within 45 days of the filing.¹⁵ They argued that the petition, as filed, is not complete because it does not contain the information required under subdivision 2 of the statute and is therefore insufficient to enable parties to conduct an analysis on the merits of the petition.

They recommended that the Commission find the petition incomplete, require CenturyLink to file additional information, and then establish a process for examining the merits of the filing. And they argued that the statute's 180-day timeframe applicable to the Commission's final decision on the petition does not begin running until after CenturyLink files all required information.

IV. Completeness Criteria

The parties' positions on the statutory criteria applicable to the petition's completeness are discussed below.

A. A list of exchange service areas in which the local exchange carrier is seeking to be regulated under this section; Minn. Stat. § 237.025, subd. 2(b) (1)

CenturyLink filed a list of 108 exchange service areas where the company is seeking to operate as a competitive service provider.

The Department stated that CenturyLink's petition is complete with respect to this requirement.

The OAG stated that CenturyLink's petition is incomplete with respect to this requirement because the company's list of exchange service areas was produced using proprietary data, as well as a proprietary analytical tool, unavailable to the parties. The OAG argued that the data must be made available to the parties because it identifies the number of households in each exchange service area, which is relevant to CenturyLink's claim that it meets the requirements to operate as a CLEC.

B. The Local Services Offered by the Local Exchange Carrier in Each Exchange Service Area; Minn. Stat. § 237.025, subd. 2(b) (2)

CenturyLink included links to its tariffs, price lists, and catalogues that identify the local services it offers in each exchange service area.

The Department and the OAG stated that CenturyLink's use of links to its online tariffs is not sufficient to make the petition complete as to this requirement. They argued that the tariffs do not list each of the local services provided by CenturyLink in each of its exchange service areas and that they are unclear as to whether there are variations in the services offered within the exchange service areas.

They contended that they need a clear delineation of CenturyLink's service offerings, by exchange service area, to compare those offerings to the voice service offerings of competitors and to then use the results of those comparisons in analyzing whether the competitive criteria under the statute are met.

¹⁵ Minn. Stat. § 237.025, subd. 3(c).

C. A List of Competitive Service Providers in Each Exchange Service Area; Minn. Stat. § 237.025, subd. 2(b) (3)

CenturyLink filed coverage maps of Minnesota that show wireless providers in each of CenturyLink's exchange service areas; the company also filed a list of cable providers within each wire center.

The Department did not take a position on whether the petition is complete as to this requirement but noted that the information filed, including maps of wireless carriers and lists of cable providers within exchange service areas, is only a partial list of providers in the exchange service areas.

The OAG concurred with the Department, arguing that the petition is not complete as to this requirement because the list is incomplete and emphasizing that CenturyLink failed to file either the supporting material identifying the sources of the data or the data relied upon to determine that the competitors identified serve, or offer service to, customers.

D. A description of affiliate relationships the petitioning local exchange carrier has with any provider of local service in each exchange service area; Minn. Stat. § 237.025, subd. 2(b) (4)

CenturyLink stated that its affiliate, CenturyLink Communications, LLC, is beginning to offer residential Voice over Internet Protocol (VoIP) service but did not have any customers as of December 31, 2015. And CenturyLink clarified that it is not relying on this affiliate relationship to demonstrate that it serves fewer than 50 percent of the households in an exchange service area, and that at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider.

The Department stated that CenturyLink's petition is incomplete as to this requirement. According to the Department, data about its affiliate is relevant to the list of local services CenturyLink offers in each exchange service area and is relevant to determining whether the affiliate is the underlying provider to any other competitive service provider.

The OAG concurred with the Department that the petition is not complete as to this requirement, emphasizing that it is unclear as to whether CenturyLink's affiliate, CenturyLink Communications, LLC, is currently providing service in any exchange service area or whether it is the underlying carrier to another provider furnishing service.

E. Documentation demonstrating the local exchange carrier's loss of local voice service customers to unaffiliated competitive service providers in each exchange service area over, at a minimum, the previous five years; Minn. Stat. § 237.025, subd. 2(b) (5)

CenturyLink filed a chart showing its Minnesota wire centers with the number of access lines in years 2000 to 2015, along with the total percentage of change between these years. The company used this information to estimate the number of lines that were lost to competitive carriers, explaining that customers do not identify their new providers when they discontinue service.

The Department argued that CenturyLink's petition is not complete as to this requirement because CenturyLink did not show the number of customers CenturyLink has lost to unaffiliated competitive service providers, only the number of customers lost. The Department also emphasized that, under the statute, CenturyLink may not include in its count of customers lost

those who transferred to an entity that is not a qualifying competitive service provider, including, for example, a CLEC that does not own a substantial portion of the last-mile or loop facilities.

The OAG concurred with the Department that CenturyLink's petition is incomplete as to this requirement, arguing that the petition includes only the results of the company's estimates of lines lost and does not include any supporting data or methodological explanations on which the estimates are based.

F. Evidence demonstrating that the local exchange carrier satisfies the competitive criteria under subdivision 4 in each exchange service area; Minn. Stat. § 237.025, subd. 2(b) (6)

CenturyLink claimed that it meets the requirements of subdivision 2(b) (6) because its data shows that it serves fewer than 50 percent of the households in each exchange service area, and that at least 60 percent of households in each exchange service area can choose voice service from at least one additional unaffiliated competitive service provider.¹⁶

CenturyLink explained that it calculated the number of households in each exchange service area by taking census data per census block and applying it to mapping data showing the borders of the exchange service areas. The company stated that where census blocks straddle multiple exchange service areas, those blocks are assigned to one exchange service area or another but not to multiple exchange service areas.

CenturyLink stated that because only the number of households – not business customers – may be counted under the statute, it conducted its analysis with the assumption that 100 percent of its market share is households only. The company stated that the census bureau does not provide data identifying the total number of businesses purchasing three or fewer lines, making it reasonable to overstate its market share of households. Based on its data, the company claimed that it serves fewer than 50 percent of the households in each of its exchange service area.

The company then compared the total number of households in each exchange service area to the percentage of households the company serves to show that it serves fewer than 50 percent of households in each exchange service area.

To demonstrate that at least 60 percent of households in each exchange service area can choose voice service from at least one additional unaffiliated competitive service provider, CenturyLink filed a map showing the company's Minnesota exchange service areas, along with wireless coverage maps showing the coverage of AT&T, Verizon, T-Mobile, and Sprint within Minnesota. CenturyLink stated that the maps are generally consistent with state broadband maps that show wireless broadband availability and that are based on data the FCC obtains from reports filed by wireless carriers.

CenturyLink's position is that if broadband coverage is available, then the statute is met because where there is a wireless signal, voice service is available, regardless of voice service *quality* or the extent to which a customer can, in fact, reach 911 at any given moment. The company argued that wireless companies are not regulated in the same manner as CLECs and cannot therefore be held to the same voice service standards of a CLEC.

¹⁶ CenturyLink stated that there is one exchange in which the percentage is 59.6 percent.

The Department disputed that CenturyLink's petition is complete as to this requirement, pointing out that the wireless carriers' coverage maps relied upon by CenturyLink are simply marketing materials, not data, taken from those carriers' websites and do not adequately reflect actual coverage or the quality of coverage, including possible gaps in coverage or whether coverage is available only outdoors.

Quality of coverage, the Department argued, is relevant to determining if voice service is available to customers. And that analysis depends on whether voice service includes "basic local service," as defined by the statute.¹⁷ If voice service includes basic elements, such as voice-grade service, then CenturyLink must provide evidence demonstrating that at least 60 percent of customers, in each exchange service area, can obtain such service from at least one unaffiliated competitive service provider. The Department argued that it is necessary to obtain technical input, such as engineering analysis, from CenturyLink to evaluate the extent of coverage available to customers in each exchange service area.

The OAG concurred with the Department that CenturyLink's use of marketing materials fails to make the petition complete as to this requirement. The OAG argued that to facilitate parties' examination of the merits of the application, the company must file the data underlying and supporting the analysis it conducted to calculate the number of residential and small business voice customers it serves in each of its exchange service areas.

G. Other information requested by the commission that is relevant to the applicable competitive criteria under subdivision 4 Minn. Stat. § 237.025, subd. 2 (7)

CenturyLink stated that it would file any additional information needed to evaluate the merits of the petition. But the company also argued that any information the Commission requests under this provision does not alter the timeline applicable to the Commission's final decision, which is due December 27, 2016 based on the company's June 30 filing date.

The Department and the OAG argued that the Commission could use this provision of the statute to direct CenturyLink to file additional information as necessary to make the petition complete.

V. Commission Action

A. Petition Completeness

The Commission is persuaded that there are two requirements affecting completeness that CenturyLink has not yet met. The first is the requirement, under subdivision 2(b) (5), to file documentation demonstrating the local exchange carrier's loss of local voice service customers to unaffiliated competitive service providers. And the second is the requirement, under subdivision 2(b) (6), to provide evidence, under subdivision 4, that it serves fewer than 50 percent of the households in each exchange service area, and that at least 60 percent of households in each exchange service area can choose voice service from at least one additional unaffiliated competitive service provider. On these two issues, the Commission finds that the petition is not complete.

¹⁷ Minn. Stat. § 237.025, subd. 8, defines basic local service to mean "(1) single party voice-grade service and touch-tone capability; (2) access to the public switched network; (3) 911 or enhanced 911 access; and (4) telecommunications relay service capability and access necessary to comply with state and federal regulations."

As to the arguments made by the Department and the OAG that the petition is incomplete for failing to satisfy other completeness criteria, the Commission concludes that those arguments are more germane to the sufficiency and persuasiveness of the petition than to its completeness. The Commission will, however, direct CenturyLink to file additional information, as described below.

1. Documentation demonstrating the local exchange carrier’s loss of local voice service customers to unaffiliated competitive service providers in each exchange service area over, at a minimum, the previous five years; Minn. Stat. § 237.025, subd. 2(b) (5)

CenturyLink’s petition does not include number-porting records relevant to the company’s claim that it has lost local voice service customers to unaffiliated competitive service providers. At the Commission meeting, CenturyLink acknowledged that it has number-porting records that show a direct link between the loss of local voice service customers and the acquisition of those customers by competitive service providers. The company claimed, however, that it did not file the data because the records, which do not account for customers who left CenturyLink for a competitive service provider but did not port their numbers, are incomplete.

But drawing the inference that customers switched from CenturyLink to competitive providers based only on the company’s estimates is insufficient in light of the availability of the company’s number-porting records. It is the Commission’s role to weigh the probative value of those records and determine the extent to which they are useful. The Commission will therefore direct CenturyLink to file its number-porting records to fulfill this statutory requirement.

2. Evidence demonstrating that the local exchange carrier satisfies the competitive criteria under subdivision 4 in each exchange service area; Minn. Stat. § 237.025, subd. 2(b) (6)

Under subdivision 4 (1) of the statute, the company must demonstrate that it serves fewer than 50 percent of the households in an exchange service area, and that at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider.

To fulfill this requirement, CenturyLink filed maps obtained from the websites of AT&T, Verizon, T-Mobile, and Sprint wireless companies showing the locations of their wireless coverage throughout Minnesota. The maps do not, however, identify the percentage of households in an exchange service area that can choose voice service from the wireless companies. As the Department pointed out, the maps do not reflect actual coverage or the adequacy of the coverage.

On AT&T’s website, for example, the wireless coverage maps are described as displaying “a predicted high-level approximation of wireless coverage.” The AT&T website also states that there are gaps in coverage not shown on the maps and that the coverage areas shown may include areas served by unaffiliated carriers. CenturyLink has not addressed what *percentage of households* can obtain voice service from a competitor, considering the unavailability of service due to coverage gaps. Furthermore, AT&T’s voice coverage legend definition describes voice coverage as “areas that should be sufficient for on-street, in-the-open and some in-building coverage.”

And importantly, according to AT&T’s website, the areas shown in stripes – as seen in the map attached to CenturyLink’s petition – require the use of specific handsets to obtain service. AT&T’s website states that “coverage in these areas can be adversely affected by distance from cell site,

network changes, weather, foliage, tower congestion, and other factors.” The striped areas appear to affect portions of western Minnesota, including many of CenturyLink’s exchange service areas in that region. It is unclear from the petition what percentage of households in each of those exchange service areas CenturyLink is claiming can, in fact, choose voice service from AT&T.

Similarly, the map depicting Verizon’s coverage area appears to show, at a high level, that coverage is widespread throughout the state. But on Verizon’s website, enlarged areas of the map appear to show “no coverage” areas not visible on the map as filed by CenturyLink. And Verizon’s website also states that the maps “contain areas of no service.” Again, it is unclear what percentage of households, by exchange service area, CenturyLink is claiming can choose voice service from Verizon.

The maps are not, on their face, sufficient to withstand an initial level of scrutiny for analyzing whether the company meets the statutory criteria. And there is no other information in the record, such as engineering testimony or other expert testimony, explaining the availability or adequacy of the wireless coverage areas shown on the maps. Furthermore, there are no affidavits, or other sworn statements, from wireless companies identifying the percentage of households, by exchange service area, that can choose voice service from an unaffiliated competitive service provider.

As CenturyLink acknowledged in its filing, the company must demonstrate that the applicable competitive criteria are met in *each* exchange service area where the company is requesting to be regulated as a CLEC. Without any evidence of the percentage of households that can choose voice service from an unaffiliated competitive service provider in each exchange service area, the Commission cannot find that the application is complete. Such information is integral to beginning any analysis on the merits of the petition. The Commission will therefore direct CenturyLink to file evidence to show that the competitive criteria under subdivision 4 are met in each exchange service area.

B. 180-Day Decision Timeframe

The Commission finds that the 180-day statutory timeframe for making a final decision on the petition in this case begins on the date the filing is complete, which will be the date on which CenturyLink files documentation showing the loss of voice service to unaffiliated competitive service providers and evidence demonstrating that the local exchange carrier satisfies the competitive criteria under Minn. Stat. § 237.025 subd. 4, set forth in subdivision 2(b) (6).

The Commission finds that the filing was complete as of August 29, 2016 as to all other issues. A finding of completeness implies no judgment on the merits of the application.

C. Expedited Proceeding

To develop the record and provide parties the opportunity to comment on the merits of the application, the Commission will initiate an expedited proceeding under Minn. Stat. § 237.61. The process will begin once CenturyLink has filed the documentation required to make the petition complete. Any party objecting to proceeding in this way must file an objection within 10 days of the date of this order.

And to facilitate record development, the Commission will delegate to the Executive Secretary the authority to establish time frames and other procedural requirements.

D. Other Applicable Requirements

As a point of clarification, the Commission will also find that the requirements of Minn. Stat. § 237.025, subdivisions 6-11, including the price restrictions related to basic local service and carrier of last resort obligations, apply in this case, independent of the criteria on which the petition is approved, if it is approved.

ORDER

1. CenturyLink's petition is incomplete until CenturyLink remedies the evidentiary deficiencies described above.
2. The 180-day statutory timeframe begins on the date the filing is complete.
3. The requirements of Minn. Stat. § 237.025, subdivisions 6-11, including the price restrictions related to basic local service and carrier of last resort obligations, apply independent of the criteria on which the petition is approved.
4. The Commission hereby initiates an expedited proceeding under Minn. Stat. § 237.61 upon CenturyLink's filing of the documentation required to make the petition complete.
5. Any party objecting to use of the expedited proceeding must file an objection within 10 days of the date of this order.
6. The Commission hereby delegates to the Executive Secretary the authority to establish time frames and other procedural requirements for the duration of this case.
7. This order shall become effective immediately.

BY ORDER OF THE COMMISSION

Daniel P. Wolf
Executive Secretary



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