

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

In the Matter of a Petition by
Citizens Telecommunications Company of Minnesota, LLC to P-407/AR-15-388
Adopt an Existing Alternative Form of Regulation Plan (AFOR)

**JOINT COMMENTS OF CITIZENS TELECOMMUNICATIONS COMPANY OF
MINNESOTA, LLC AND THE MINNESOTA DEPARTMENT OF COMMERCE**

On April 27, 2015, Citizens Telecommunications Company of Minnesota, LLC (“CTC-Minnesota”) filed notice with the Minnesota Public Utilities Commission (Commission) of its election to opt into the existing Alternative Form of Regulation Plan (AFOR) of Frontier Communications of Minnesota, Inc. (Frontier-Minnesota). The Commission approved the Frontier-Minnesota AFOR plan in Docket P405/AR-14-735 on February 23, 2015.

On May 17, the Minnesota Department of Commerce (Department) filed comments, noting that aspects of CTC-Minnesota’s April 27 filing were inconsistent with the Frontier AFOR, and recommending that certain changes be incorporated into the AFOR Plan prior to any solicitation of comments.

On July 15, 2015, CTC-Minnesota filed a revised AFOR document that addressed the matters raised by the Department. Specifically, the revised document incorporates a modification to Section IV, B(1)(a) reflecting that CTC-Minnesota will implement a rate increase to R1 rates in years two and three of the plan only to the extent that the total rate (R1 rate plus the rate increase plus any applicable EAS additive) does not exceed the FCC-established rate floor in effect at that time, which the Commission approved in the Frontier-Minnesota AFOR. Appendix A of the proposed AFOR document was revised to reflect that Private and Semi-private Directory Listings, Toll Restriction, and Intralata Operator Services are price-regulated services. CTC-Minnesota has agreed to modify its Flexibly Priced and Price Regulated tariffs accordingly. Finally, the

revised filing included new language regarding Line Extensions that mirrors Frontier Minnesota's tariff language approved by the Commission. CTC-Minnesota has agreed to file the above tariff changes within 30 days of a Commission Order approving the AFOR adoption.

On July 17, 2015, the Commission issued its Order Establishing Procedural Schedule and Requiring Public Outreach with the following procedural schedule:

Establish website: July 24, 2015
Settlement or Comments: August 14, 2015
Reply Comments: August 24, 2014
Final Comments: September 4, 2015
Commission hearing: October 1, 2015
Statutory deadline: October 31, 2015

CTC-Minnesota and the Department (collectively, the Parties) have engaged in settlement discussions regarding the AFOR adoption. CTC-Minnesota has incorporated all of the corrections and modifications recommended by the Department into the July 15, 2015 revised Plan. Prior to filing a settlement agreement, the Parties wish to give consideration to any other comments filed in this matter. The Parties intend to file a settlement agreement or additional comments on or before August 24, 2015 in order to allow other interested persons the opportunity to review and comment by the September 4th deadline.

Dated August 14, 2015

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS COMPANY OF MINNESOTA, LLC

/s/ Scott Bohler

Scott Bohler
Manager, Government and External Affairs
2378 Wilshire Blvd. Mound, MN 55364
(952) 491-5534 Telephone
scott.bohler@ftr.com

MINNESOTA DEPARTMENT OF COMMERCE

/s/ Katherine Doherty

Katherine Doherty
Public Utilities Rates Analyst