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January 22, 2015

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**  
Docket No. P999/SA-15-81

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce in the following matter:

Annual update of telephone exchange boundaries.

The Department recommends **that the boundary revisions be accepted** and is available to answer any questions the Commission may have.

Sincerely,

/s/ GREGORY J. DOYLE  
Manager, Telecommunications

GJD/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. P999/SA-15-81

I. BACKGROUND

On November 6, 2012, the Federal Communications Commission (FCC) Wireline Competition Bureau (Bureau) released a *Report and Order*<sup>1</sup> (*Study Area Boundary Order*) that established requirements for the collection of study area boundaries for purposes of implementing various reforms adopted as part of the *USF/ICC Transformation Order*,<sup>2</sup> including the FCC's benchmarking rule and the rule eliminating support where an unsubsidized competitor offers voice and broadband service that overlaps an ILEC's study area.<sup>3</sup>

On February 26, 2013, the Bureau released a subsequent *Order on Reconsideration*<sup>4</sup> that adopted certain modifications and clarifications to the requirements for the data collection. As set forth in the orders, each ILEC must certify and submit data on the boundary(ies) of the area(s) it serves in a state (study area boundary), or allow a state entity to submit and certify the data on its behalf.<sup>5</sup>

On March 1, 2013, the Minnesota Telecom Alliance (MTA) joined the Minnesota Department of Commerce (Department) in introducing a joint project whereby the MTA and the

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<sup>1</sup> *Connect America Fund; High-Cost Universal Service Support*, WC Docket Nos. 10-90, 05-337, Report and Order, 27 FCC Rcd 13528 (Wireline Comp. Bur. 2012) (*Study Area Boundary Order*). The *Study Area Boundary Order* was published in the *Federal Register* on January 28, 2013. See 78 FR 5750.

<sup>2</sup> See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform—Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (*USF/ICC Transformation Order*), *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011).

<sup>3</sup> *Study Area Boundary Order*, 27 FCC Rcd 13528, at ¶¶ 2-6.

<sup>4</sup> *Study Area Boundary Order*, Order on Reconsideration, DA 13-282 (rel. Feb. 26, 2013).

<sup>5</sup> *Id.* at ¶¶ 2 and 16 (modifying the *Study Area Boundary Order* by allowing states to certify to the accuracy of the data they submit, rather than requiring ILECs to make the certification); *Study Area Boundary Order*, 27 FCC Rcd at 13528, ¶ 17 (allowing state entities to submit shape files on behalf of the states' ILECs).

Department would collaborate to assist Minnesota ILECs in complying with the *Study Area Boundary Order*. 100% of Minnesota ILECs agreed to participate in the project and allow the Department, with Commission approval, to certify and submit Minnesota's study area boundary data.<sup>6</sup> The Department entered into a contract with the Minnesota Geospatial Information Office (MnGeo) to create an efficient way for ILECs to participate in the review and verification process using an online web map.

On June 26, 2013, in Docket No. P-999/SA-13-381, the Minnesota Public Utilities Commission issued its Order Accepting Digital Exchange Boundary Map as Official Telephone Exchange Boundary Map and Approving for Submission to FCC. In its Order, the Commission states that all disputed study area boundary issues and all proposed digital boundary map changes shall be filed with the Commission for approval.

The annual update is due on March 15<sup>th</sup> of each year for changes made to telephone exchange boundaries through December 31 of the previous year.<sup>7</sup> Since March 15<sup>th</sup> falls on a Sunday in 2015, the telephone exchange boundary map update is due on March 16, 2015. The Department entered into a contract with MnGeo for the purpose of assisting Minnesota ILECs in satisfying the FCC requirement to update the telephone exchange boundary map for any boundary map changes through December 31, 2014.

## II. STATEMENT OF ISSUES

Whether the Commission should accept the updated telephone exchange boundary map for filing with the FCC.

## III. BACKGROUND

### A. TELEPHONE EXCHANGE BOUNDARY REVISION PROCESS

In the current project to update telephone exchange boundary maps, a designated contact person from each ILEC was provided access to a secure MnGeo website. At this website, existing exchange boundaries were viewable and ILECs were able to propose changes on a map layer that is distinct from the actual exchange boundary map. This layer is called the "Red Line Snapping Layer" and also shows all proposed boundary changes that were not agreed upon in the previous exchange boundary verification projects. All proposed boundary lines that have not yet been agreed upon are colored red on the web map.

In addition to proposing any changes so that the electronic map reflects the actual customers served, ILECs were also to review neighboring carriers' proposed changes so

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<sup>6</sup> *Study Area Boundary Order*, 27 FCC Rcd at 13528, ¶ 8 (The data must be submitted at the exchange level, with a shape file for each study area depicting each exchange as a closed, non-overlapping polygon).

<sup>7</sup> *Study Area Boundary Order*, 27 FCC Rcd at 13528, ¶ 23 (noting that boundaries can change as the result of a transaction involving the addition or sale of exchanges, new deployment into previously-unserved areas, or an ILEC relinquishing its ETC designation and COLR obligations).

agreement can be reached on where the boundaries lie. If the carriers reach an impasse concerning a boundary, the Department offered to help resolve the issue by referring to the paper maps, which were the official maps prior to the Commission's June 26, 2013 Order. Although not all of the proposed boundary changes have been agreed upon by adjoining ILECs in the current process, the Department was not asked to assist in the resolution of any disputes. When it becomes more apparent what the financial implications are of the telephone exchange boundary maps, there may be more incentive for companies to ensure that boundary disputes are resolved.

When adjoining companies reached agreement on a change to the telephone exchange boundary line, the company initiating the proposed revision changed the red line to a blue line on the Red Line Snapping Layer of the web map. With this agreement between the companies, the Department had the necessary editing credentials to change the underlying telephone exchange boundary map to match the agreed upon lines, as reflected by blue lines on the web map.

#### **B. *CHANGES TO TELEPHONE EXCHANGE BOUNDARY MAP***

Viewing the web map is the most informative way to see the areas where the telephone exchange boundaries have been changed. When the underlying telephone exchange boundary is changed on the map, the previous boundary line is no longer available for viewing. Thus, the web map only reflects the corrected boundary lines and there is not a practical way for the previous and new boundaries to be presented to the Commission for its consideration. For the purpose of receiving Commission approval of the changes, Attachment 1 is a "print-screen" of the boundary changes made to the web map. The first company identified in each row is the company that initiated the boundary change. The second company identified in each row is the adjoining company. If a company made a boundary change between its own exchanges, it is listed as both the first and second companies in the row. If the same two companies are listed more than once, it is because more than one boundary line changed between those two companies. Attachment 2 shows the geographic area where boundary changes were made. The blue lines on the map reflect the new boundary line.

#### **IV. COMMISSION ALTERNATIVES**

1. Accept the boundary revisions agreed to by the companies as reflected in these comments and authorize the Department to upload all revised shape files to the FCC boundary data website no later than March 16, 2015.
2. Other action the Commission deems appropriate.

**V. RECOMMENDATION**

The Department recommends alternative 1:

Accept the boundary revisions agreed to by the companies as reflected in these comments and authorize the Department to upload all revised shape files to the FCC boundary data website no later than March 16, 2015.

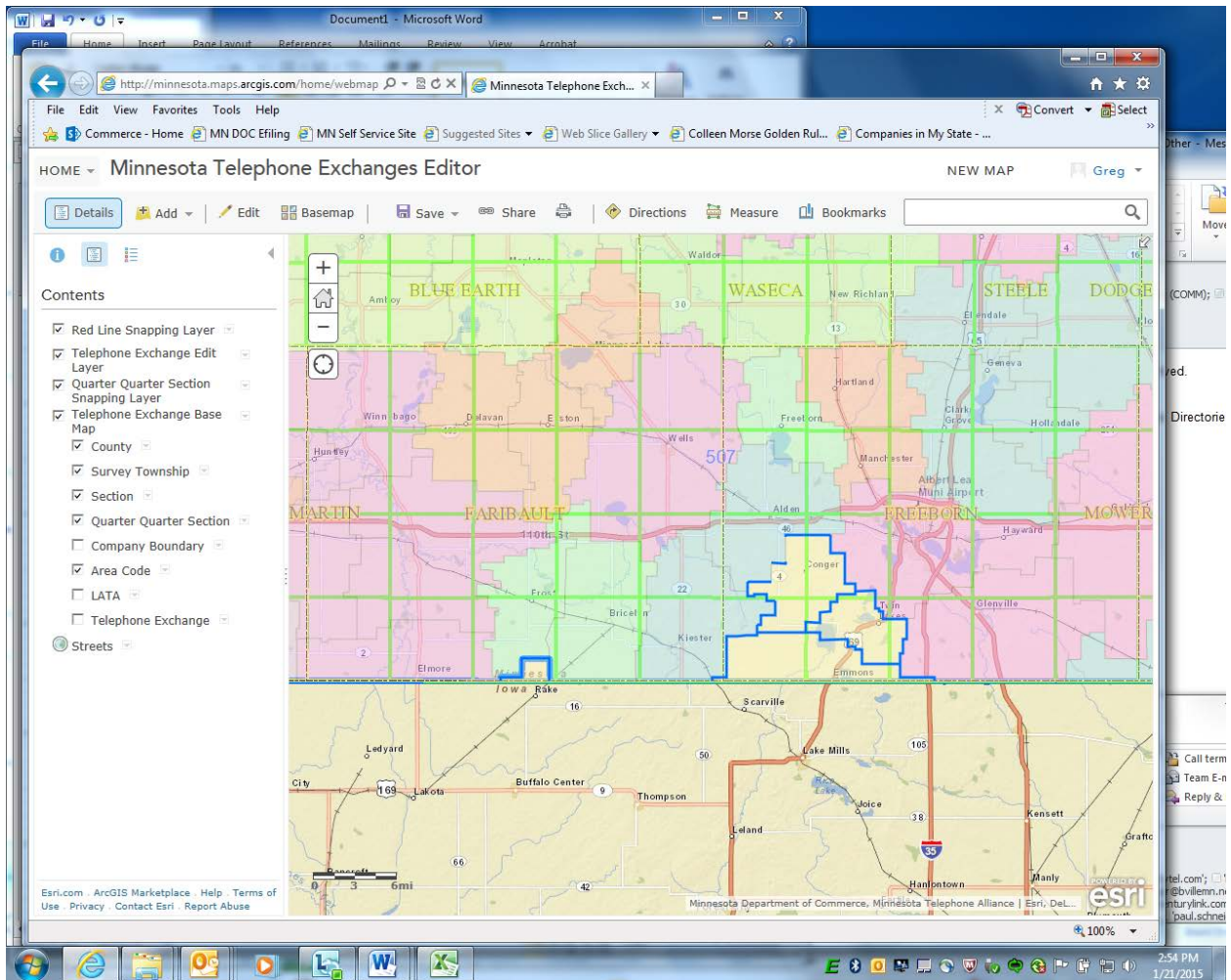
/lt

The screenshot shows the 'Minnesota Telephone Exchanges Editor' web application. The main content area displays a table with the following data:

December 12, 2014	Winnebago Coop. Telecom Assoc.	December 12, 2014	Winnebago Coop. Telecom Assoc.	Agree to the proposed revision
December 12, 2014	Winnebago Coop. Telecom Assoc.	December 12, 2014	Winnebago Coop. Telecom Assoc.	Agree to the proposed revision
December 10, 2014	Winnebago Coop. Telecom Assoc.	December 15, 2014	Qwest Corporation	Agree to the proposed revision
December 10, 2014	Winnebago Coop. Telecom Assoc.	December 15, 2014	Qwest Corporation	Agree to the proposed revision
December 10, 2014	Winnebago Coop. Telecom Assoc.	December 15, 2015	Qwest Corporation	Agree to the proposed revision
December 10, 2014	Winnebago Coop. Telecom Assoc.	January 5, 2015	Citizens Telecommunications Company of MN,LLC	Agree to the proposed revision
December 10, 2014	Winnebago Coop. Telecom Assoc.	January 5, 2015	Citizens Telecommunications Company of MN,LLC	Agree to the proposed revision
December 10, 2014	Winnebago Coop. Telecom Assoc.	January 5, 2015	Citizens Telecommunications Company of MN,LLC	Agree to the proposed revision
December 10, 2014	Winnebago Coop. Telecom Assoc.	January 5, 2015	Citizens Telecommunications Company of MN,LLC	Agree to the proposed revision
December 9, 2014	Winnebago Coop. Telecom Assoc.	January 5, 2015	Citizens Telecommunications Company of MN,LLC	Agree to the proposed revision
December 9, 2014	Winnebago Coop. Telecom Assoc.	January 5, 2015	Citizens Telecommunications Company of MN,LLC	Agree to the proposed revision
January 5, 2015	Winnebago Coop. Telecom Assoc.	January 6, 2015	Citizens Telecommunications Company of MN,LLC	Agree to the proposed revision
December 8, 2014	Winnebago Coop. Telecom Assoc.	January 6, 2015	Blue Earth Valley Telephone Company dba BEVCOMM	Agree to the proposed revision

The interface also features a 'Contents' panel on the left with the following layers:

- Red Line Snapping Layer
- Telephone Exchange Edit Layer
- Quarter Quarter Section Snapping Layer
- Telephone Exchange Base Map
- County
- Survey Township
- Section
- Quarter Quarter Section
- Company Boundary
- Area Code
- LATA
- Telephone Exchange
- Terrain with Labels



## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Comments**

**Docket No. P999/SA-15-81**

**Dated this 22<sup>nd</sup> day of January 2015**

**/s/Sharon Ferguson**



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_15-81_P999.SA-15-81
Daniel	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551022147	Electronic Service	Yes	OFF_SL_15-81_P999.SA-15-81

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Jim	Beattie	N/A	Blue Earth Valley Telephone Co.	123 West 7th Street  Blue Earth, MN 56013	Paper Service	No	SPL_SL_15-81_P999.SA-15-81
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S  Bellingham, MN 56212-1000	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
David	Bickett		Park Region Mutual Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SL_15-81_P999.SA-15-81
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Mark	Birkholz	N/A	Clements Telephone Company	150 2nd St. SW  Perham, MN 56573	Paper Service	No	SPL_SL_15-81_P999.SA-15-81
Nancy	Blankenhagen	nancyblankenhagen@nutelcom.net	New Ulm Telecom Inc.	P.O. Box 697 27 N. Minnesota Street New Ulm, MN 560730697	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd  Mound, MN 55364-1652	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
John	Bokelmann	manchester@deskmedia.com	Manchester Heartland	204 Railroad St  Manchester, MN 56007-5012	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Kathy	Boutwell	kathyb@chriscomco.net	Christensen Communications Co	104 Main Street West  Madelia, MN 56062	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Mary	Buley	N/A	Minnesota Independent Equal Access Corp.	10300 6th Ave N  Plymouth, MN 55441	Paper Service	No	SPL_SL_15-81_P999.SA-15-81

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Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Teresa	Crews	tcrews@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	Suite 100 1831 Anne Street Bemidji, MN 56601	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
David L.	Dunning	N/A	Wolverton Telephone Company	PO Box 270  Park River, ND 58270	Paper Service	No	SPL_SL_15-81_P999.SA-15-81
Erin	Feikema	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd Ave PO Box 127  Lismore, MN 56155	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
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Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
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Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Assoc	PO Box 304 308 Frontage Rd Sebeka, MN 56477	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Bruce	Hanson	N/A	Clara City Telephone Company	1700 Technology Dr Ste 100  Willmar, MN 56201	Paper Service	No	SPL_SL_15-81_P999.SA-15-81
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David	Schornack	N/A	East Otter Tail Telephone Company	150 2nd Street SW  Perham, MN 56573	Paper Service	No	SPL_SL_15-81_P999.SA-15-81
David	Schornack	N/A	Arrowhead Communications Corporation	150 Second Street SW  Perham, MN 56573	Paper Service	No	SPL_SL_15-81_P999.SA-15-81
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 126 South Main Street Lonsdale, MN 55046-0358	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
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Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East Cedar P.O. Box 360  Houston, MN 559430360	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St  Lake Mills, IA 50450	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277  Upsala, MN 56384	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Kent	Westphal	kwestphal@mypremieronline.com	Northern Iowa Telephone Company	PO Box 200 339 1st Ave E Sioux Center, IA 51250	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81
David	Wolf	dwolf@gctel.net	Gardonville Cooperative Telephone Association	800 Central Ave N  Brandon, MN 56315	Electronic Service	No	SPL_SL_15-81_P999.SA-15-81