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January 28th, 2021

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

Re: In the Matter of the Petition of Winnebago Cooperative Telecom Association to
Expand its Designation as a Eligible Telecommunications Carrier
Docket No: _____

Dear Mr. Seuffert:

Enclosed via efileing please find the Original Filing, Summary of Filing, and Petition for
Expansion as a Eligible Telecommunications Carrier, and Affidavit of Service in the
above entitled Docket on behalf of Winnebago Cooperative Telecom Association.

Sincerely,

/s/ Mary T. Buley

Mary T. Buley
Consultant on behalf of Winnebago Cooperative Telecom Association

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Petition of Winnebago Cooperative Telecom Association for Expansion as a Eligible Telecommunications Carrier MPUC Docket No.: _____

ORIGINAL FILING

Winnebago Cooperative Telecom Association (“WCTA”) requests the Minnesota Public Utilities Commission (“Commission”) for an expansion of its designation as a Eligible Telecommunications Carrier (“ETC”) through areas awarded to WCTA in the FCC Rural Digital Opportunity Fund Auction where the Commission has not designated WCTA as an Eligible Telecommunications Carrier.

The filing includes the following attachments:

- Attachment 1 One paragraph summary of the filing in accordance with Minn. Rules pt. [7829.1300](#).
- Attachment 2 Petition to expand Winnebago Cooperative Telecom Association service area as a Eligible Telecommunications Carrier, which contains a description of the filing, the impact on Petitioner and affected ratepayers, and the reasons for the filings, provided in accordance with Minn. Rules pt. 7829.1300, subp. 4(F).
- Attachment 3 Affidavit of Service.

In addition, the following information is provided, in accordance with Minn. Rules pt. 7829.1300, subp. 4:

Utility:	Winnebago Cooperative Telecom Association 212 Main St S. Karlstad, MN 56732
Date of Filing	January 28 th , 2021
Controlling Statute for Time in Processing the Filing	Minn. Rules pt. 7811.1400 , subp. 12

If additional information is required, please contact me at 651.621.8306.

/s/ *Mary T. Buley*

Mary T. Buley
Consultant on behalf of Winnebago Cooperative Telecom Association

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Petition of Winnebago
Cooperative Telecom Association for Expansion to
its Designation as a Eligible Telecommunications
Carrier

MPUC Docket No.: _____

SUMMARY OF FILING

Winnebago Cooperative Telecom Association ("WCTA") requests the Minnesota Public Utilities Commission grant an Expansion of its designation as a Eligible Telecommunications Carrier ("ETC") for new census blocks where the Commission has not designated Winnebago as an Eligible Telecommunications Carrier.

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Petition of Winnebago Cooperative Telecom Association for Expansion of its Designation as a Eligible Telecommunications Carrier MPUC Docket No.: _____

**PETITION FOR EXPANSION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

WCTA was designated as an ETC in Docket No. 14-147 by the Commission on April 18, 2014. In that petition WCTA was granted ETC authority in its two CLEC exchanges of Albert Lea and Glenville. In this petition WCTA requests expansion of its ETC service area for certain census blocks awarded to WCTA in the FCC Rural Digital Opportunity Fund Auction 904. WCTA was awarded 178 locations in Minnesota and a dollar amount of \$2,054.17 yearly of universal high cost support.

In support of its Petition, WCTA states as follows:

- A. The legal name, address and telephone number of the Petitioner and its designated contact person are as follows:

Winnebago Cooperative Telecom Association
704 E. Main St, Lake Mills, IA 50450

WCTA is represented in connection with this petition by its consultant:

Mary T. Buley
Olsen Thielen & Co., Ltd.
2675 Long Lake Road
St. Paul, MN 55113
651.621.8306

- B. The name and title of the officer or representative of WCTA authorizing this petition is, Mark Thoma, CEO, whose signature appears at the end of this petition.
- C. The proposed effective date of designation of eligibility to receive Universal Service Support is immediately upon the Commission's issuance of an Order approving this Petition.

- D. The service area (“Proposed Service Area”) for which Expanded ETC designation is sought, is set forth following map in [Exhibit 1](#). See Exhibit 3 for a list of the RDOF Census Blocks.
- E. WCTA’s Petition for expansion of its designation as a ETC for the Proposed RDOF Census Blocks A is consistent with the public interest, convenience and necessity, and satisfies the requirements for receiving universal service support under state and federal law, for the following reasons:

WCTA POSSESSES THE INTENT AND CAPABILITY OF PROVIDING SERVICE UPON REASONABLE CUSTOMER REQUEST THROUGHOUT THE SERVICE AREA

1. WCTA's Regulatory Authority – WCTA is an incumbent local exchange carrier (ILEC) in the exchanges of Conger, Emmons, Twin Lakes, and North Rake exchanges. In Docket No. P572/AM-07387 WCTA requested to amend its existing certificate of authority to allow it provide facilities based local exchange service as a competitive local exchange carrier (CLEC) in Albert Lea, MN a Qwest exchange. The Commission approved that request on March 30, 2007. In 2010, WCTA petitioned to expand its CLEC authority to include Glenville, MN a Qwest exchange in Docket No. P571/AM-10-127. This petition was approved on December 30th, 2010. In Docket No. P571/AM-14-147 Winnebago petitioned the Commission for ETC designation for its CLEC operations in Albert Lea and Glenville. Winnebago was granted ETC authority on April 18, 2014. In this petition WCTA is requesting to expand its ETC authority to include its RDOF census blocks.
2. WCTA's Facilities and Commitment to Serve –The areas awarded to WCTA as a part of the FCC RDOF Auction will be served with fiber to the premise (FTTP) in its CLEC territories. WCTA is committed to provide service to all customers making a reasonable request for service. WCTA certifies that it will: (a) provide service on a timely basis to requesting customers within the Service Area where WCTA’s network already passes the potential customer's premises; and (b) provide service within a reasonable period of time, if the potential customer is within the Service Area but not passed by WCTA’s current network facilities if service can be provided at reasonable cost by constructing network facilities.
3. WCTA's Basic Universal Service Offering – WCTA will provide voice telephony in the Service Area. The services WCTA offers meet the Basic Local Service requirements under [Minn. Rule 7812.0600](#). WCTA has the ability and the intention to provide the voice telephony services required by [47 CFR § 54.101\(a\)](#)¹:
 - Voice grade access to the public switched network or its functional equivalent;
 - Minutes of use for local service provided at no additional charge to end users;

¹ [FCC Connect America Order 11-161 rel. November 18, 2011](#) at ¶ 76-81 discusses the changes to [47 CFR § 51.101](#) and the required voice service offerings.

- Access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911
- Toll limitation for qualifying low-income consumers

The universal service offering will be made available throughout the Proposed Service Area upon its expanded designation as an ETC. WCTA's tariffs address customer eligibility provisions and the availability of subsidies under the Lifeline program² and the Minnesota Telephone Assistance Plan³. The applicable sections of WCTA's tariff are attached as [Exhibit 2](#). WCTA is committed to providing the supported services throughout the Service Area to all customers who make a request for such services if service can be provided at reasonable cost by constructing network facilities. The local usage plans offered are comparable to those offered by the incumbent local exchange carriers. WCTA's local calling scope will mirror those of the ILECs and any mandatory Extended Area Service calling as part of the basic local service offering.

4. WCTA's Advertising Plan - WCTA currently advertises its services through several different channels of general distribution, including WCTA's telephone directory and annual customer notice. WCTA will advertise the availability of its universal service offering throughout the Service Area through these same advertising channels it currently employs. In addition, the availability of the offering throughout the Proposed Service Area will be listed continuously on WCTA's web site: <https://wikel.com/>.
5. WCTA's 10-Year Plan for Use of Universal Service Support - WCTA will receive Universal High Cost Support and Lifeline support to the extent it serves customers eligible for that program.
6. WCTA's Ability to Remain Functional in Emergency Situations. WCTA's network will remain functional in emergency situations:

Commercial power outage: The central office serving WCTA's customers is equipped with electrical generators and battery power supply to provide service in the event of a commercial power outage.

Network failure: The interoffice facilities serving the Service Area are on a diverse routed fiber optic ring, which if cut will be automatically rerouted.

WCTA complies with the Commission's Rules in Chapter [7810](#) establishing minimum standards on various operational matters, such as 7810.3900 (Emergency Operations); 7810.4900 (Adequacy of Service); and 7810.5300 (Dial Service Requirements).

² WCTA Local Exchange Tariff Part IV, Sheet 45 and 45A

³ WCTA Local Exchange Tariff Part IV, Sheet 45B

7. WCTA's Satisfaction of Consumer Protection and Service Quality Standards – WCTA, is subject to, and complies with, the Commission's Rules pertaining to service quality and consumer protection. WCTA's tariff has specific provisions outlining the following terms addressing consumer protection issues:
- Deposit and guarantee requirements⁴
 - Customer Billing⁵
 - Appropriate handling of customer complaints and billing disputes⁶
 - Disconnection and notice requirements⁷

The specific provisions in WCTA's tariff, as well as the Commission's service quality rules by which WCTA is bound, will apply throughout the Proposed Expanded Service Area and assure a high level of service quality and consumer protection.

DESIGNATING WCTA AS A ETC IN THE PROPOSED EXPANDED SERVICE AREA WILL SERVE THE PUBLIC INTEREST

8. Public Interest - Designation of WCTA as a ETC in the Proposed Expanded Service Area is in the public interest since it affords qualifying customers a choice of service providers while retaining the Lifeline benefit.
9. Superior Service Offering – WCTA believes its service offerings are superior to that offered by the ILECs' to customers in the Service Area. WCTA has fiber optic facilities adjacent and near the Proposed Expanded Service Area and plans to place fiber to the home over a three year period, offering a technically superior network to that of ILECs.

WCTA believes customers will additionally benefit from choosing a locally owned and facility based provider which has demonstrated its commitment to, and success in, responding to the service needs of its residents.

10. Affordability – The local exchange services offered to WCTA's customers for universal service offerings are within the range of the announced Federal Communications Commission ("FCC") 2021 Annual Urban Rate Survey rates.⁸ WCTA's basic service offerings rates are identified in its Local Exchange Services⁹ tariff. WCTA will provide the benefit of Lifeline discounts to qualifying subscribers.
11. Commitment to Service Quality - As noted in Paragraph E.7 above, Wikstrom is a certified CLEC in Minnesota is subject to, and complies with, the Commission's Rules pertaining to service quality and consumer protection.

⁴ WCTA Local Exchange Tariff, Part II, sheet 8, 9, 10

⁵ WCTA Local Exchange Tariff, Part II, sheet 16

⁶ WCTA Local Exchange Tariff, Part II, sheet 18

⁷WCTA local Exchange Tariff, Part II, sheet 13 and 14

⁸ WC Docket 10-9, Announcement from the Wireline Competition Bureau and Office of Economics and Analytics issued 11-30-20.

⁹ WCTA Local Exchange Tariff, Part IV, sheet 1

ETC CERTIFICATION

12. Request for Certification - WCTA requests that the Commission certify its use of support effective as of the date of WCTA's ETC designation for the Proposed Expanded Service Area.

CONCLUSION

13. WCTA meets the requirements of both state and federal laws and regulations for designation as an Eligible Telecommunications Carrier in the requested Proposed Service Area. Pursuant to [47 USC § 214\(e\)](#), the Commission should designate WCTA as an Eligible Telecommunications Carrier for the expanded RDOF Service Area. In so doing, the Commission will ensure that consumers in the expanded RDOF Service Area have an opportunity to secure better and more reliable service at a rate equal to or less than that which they are currently paying. The consumers in the expanded Service Area will benefit and the public interest will be served if WCTA's Petition is approved.

Therefore, WCTA respectfully requests that the Commission:

- A. Approve Winnebago Cooperative Telecom Association's petition as a ETC for receipt of federal universal service support with respect to the expanded RDOF Service Areas specified in this Petition;
- B. For such other and further relief as the Commission may deem just and reasonable.

Dated: January 28th, 2021

By: /s/Mary T. Buley
Mary T. Buley

CONSULTANT FOR WINNEBAGO
COOPERATIVE TELECOM
ASSOCIATION

VERIFICATION

The undersigned, Mark Thoma, CEO of Winnebago Cooperative Telecom Association, certifies that he has reviewed this Petition and the facts stated therein, of which he has personal knowledge, and that the same are true and correct to the best of his present knowledge and belief.

Respectfully submitted,

Winnebago Cooperative Telecom Association

By: /s/Mark Thoma

Mark Thoma

CEO

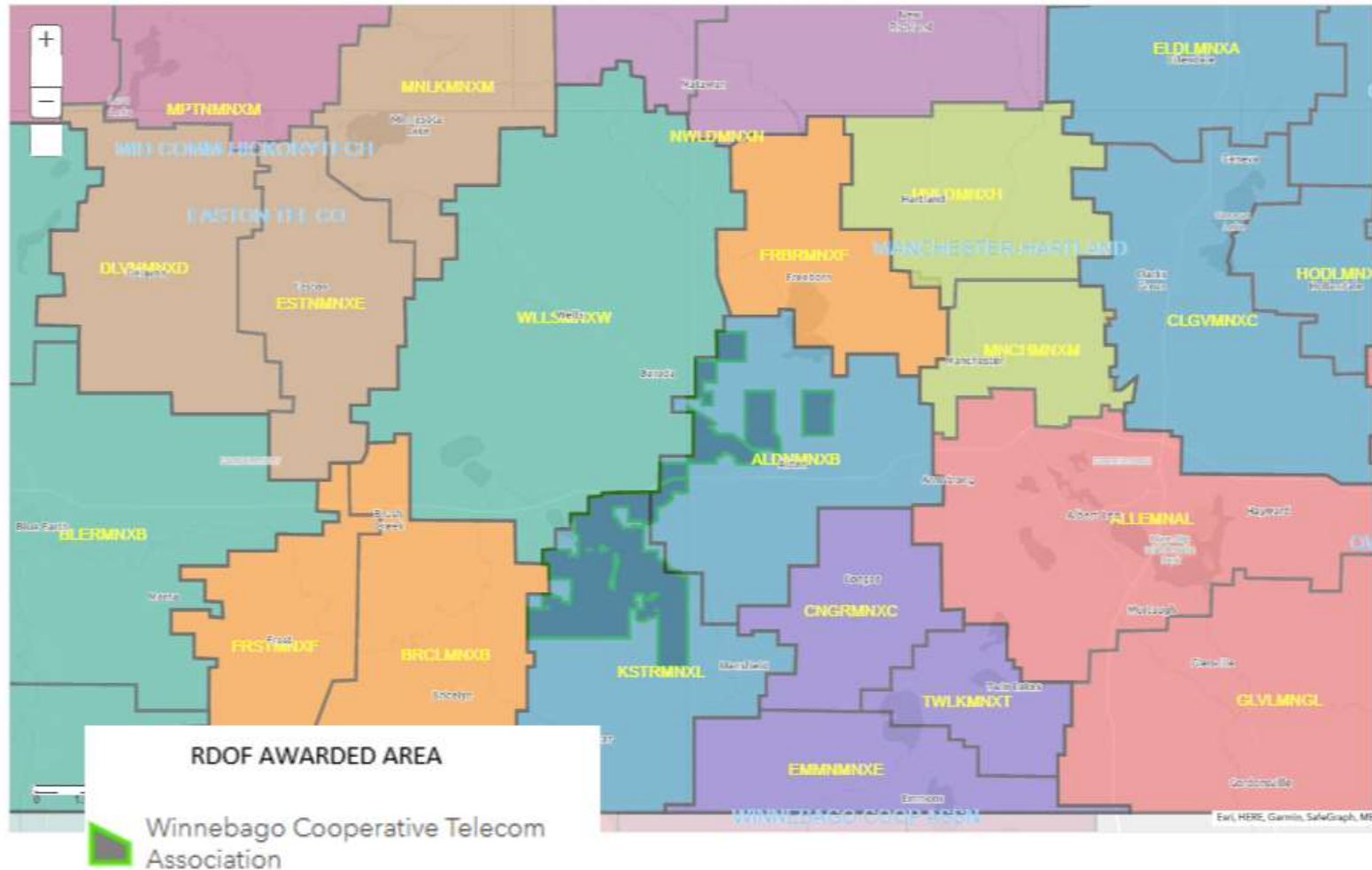
AFFIDAVIT OF SERVICE

In the Matter of the Petition of Winnebago Cooperative Telecom Association for Expansion of its Designation as an Eligible Telecommunications Carrier MPUC Docket No.: _____

I, Mary T. Buley, state that on January 28th, 2021 I caused copies of the attached Notice regarding the filing of Winnebago Cooperative Telecom Association's application for expanded designation as a Eligible Telecommunications Carrier to be filed using eService or mailed by United States first class mail postage prepaid thereon, to the following persons:

Will Seuffert (efile) Executive Secretary	Linda Chavez (efile) Minnesota Department of Commerce
Mark Thoma (e-mail) Winnebago Cooperative Telecom Association	Scott Bohler (e-mail) Citizens Telecom Co MN
John Kroger(e-mail) Winnebago Cooperative Telecom Association	

Winnebago Cooperative Rural Digital Opportunity Fund Awarded Census Blocks by Wire Center



The tariff pages following address:

- [Deposit and guarantee requirements](#)
- [Customer Billing](#)
- [Customer Complaints and Billing Disputes](#)
- [Disconnection and notice requirements](#)
- [Lifeline and MN TAP](#)
- [Link-Up](#)
- [Basic Local Service Rates](#)

Deposit and Guarantee Requirements

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART II
Original Sheet 8

Filed with M.P.U.C.

GENERAL RULES AND REGULATIONS

E. TELEPHONE DIRECTORIES

1. Distribution and Publication

- a. The Company will normally publish and distribute a directory annually containing the serving exchange listings for each Central Office Access Line without charge. Additional directories may be furnished at the discretion of the Company. Directories containing listings for other areas may be provided at a nominal charge.

2. Ownership and Use

- a. Directories furnished to customers remain the property of the Company and are provided to customers as an aid in the use of the telephone service. The Company reserves the right to charge for directories issued in replacement of directories.

3. Directory Listings

- a. Directory listings remain the property of the Company and are not to be reproduced without the permission of the Company.

F. ESTABLISHMENT AND MAINTENANCE OF CREDIT

1. Establishment of Credit

- a. The Company is not obligated to provide service to any individual or firm that owes for service previously rendered by the Company at the same or a different address, until arrangements have been made to liquidate such previous indebtedness to the Company. Nor is the Company obligated to continue to provide service to any individual or firm whose credit with the Company is or becomes doubtful, in the opinion of the Company. Applicants for telephone service who are required to make a deposit may be required to pay in advance of installation, the service connection, installation and/or construction charges. In order to insure the payment of all charges due for its service, the Company may require any customer to establish and maintain his credit in one of the following ways:
 - 1) By furnishing credit references acceptable to the Company.
 - 2) By means of a cash deposit.

EFFECTIVE: February 1, 2008
Date

BY: Terry Wegener General Manager Lake Mills, Iowa
Name Title Address

Deposit and Guarantee Requirements (cont.)

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART II
Original Sheet 9

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GENERAL RULES AND REGULATIONS

F. ESTABLISHMENT AND MAINTENANCE OF CREDIT (Continued)

2. Amount of Deposits

- a. The amount of deposit required shall not be more than the maximum charge for two months local exchange service plus two months estimated toll service or as may reasonably be required by the Company in cases involving service for short periods or special occasions. The Company may require the customer to increase the amount of the deposit at any time, if the charges billed against the customer are found to warrant such an increase.
- b. If toll usage is abnormal, the Company may require a new deposit, or an increase in the deposit to guarantee payment of a bill.
 - 1) For customers with at least six consecutive months of service, abnormal usage of toll service is at least a twenty-five percent increase in monthly toll charges which amounts to at least twenty dollars. To determine the increase, comparison shall be to the customer's average monthly toll during not less than the prior three months.
 - 2) For customers with less than six consecutive months of service, abnormal usage of toll service is when one month's toll charges exceeds the deposit attributable to toll by at least twenty-five percent and this excess amounts to at least twenty dollars.
- c. A deposit may be made at any Company business office or authorized agent.
- d. The Company will maintain records which show the name and address of each depositor, the amount and date of the deposit and each transaction concerning the deposit. Unclaimed deposits shall be disposed of in accordance with law.
- e. A receipt of deposit will be furnished to each customer from whom a deposit is received. Upon customer request, duplicate receipts will be provided to customers who have lost their receipt if the deposit is substantiated by the Company records.
- f. Qualifying applicants for the Lifeline may initiate service without paying a deposit if they voluntarily elect to have Toll Blocking on their line. Toll Blocking will be provided at no charge to Lifeline customers.

EFFECTIVE: February 1, 2008
Date

BY: Terry Wegener, General Manager, Lake Mills, Iowa
Name Title Address

Customer Deposits

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART II
Original Sheet 10

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GENERAL RULES AND REGULATIONS

F. ESTABLISHMENT AND MAINTENANCE OF CREDIT (Continued)

3. Deposits and Collection Practices

a. The fact that a deposit has been made in no way relieves the applicant or customer from complying with the Company's regulations as to advance payments and the prompt payment of bills; nor constitutes a waiver or modification of the regular practices of the Company providing for the discontinuance of service for nonpayment of sums due the Company for services rendered. The Company may discontinue service to any customer failing to pay current bills regardless of the fact that such customer has made a deposit with the Company to secure payment of such bills, or has furnished the Company with a guarantee in writing for such bills.

4. Interest to Be Paid on Deposits

a. Interest shall be paid on deposits at the rate set by the Commissioner of the Department of Commerce as required by Minnesota Statute 325E.02. The interest rate may be found on the Department of Commerce website at www.commerce.state.mn.us. Interest shall be paid for the period beginning with the date of deposit to the date of refund or to the date that the deposit is applied to the customer's account or to the date the customer's bill becomes permanently delinquent. The Company may, at its option, pay the interest at intervals it chooses, but at least annually, by direct payment or as a credit on bills.

5. Discontinuance of Service for Failure to Establish Credit

a. Service may be discontinued for failure to establish or maintain credit, as set forth in F.1. above, twelve days after the Company has mailed notice requiring the customer to do so.

6. Service Charge for Reconnection

a. Where service has been discontinued for failure to establish or maintain credit, as set forth in F.1 above, the applicable service charges as defined in Part VI of this tariff shall apply.

7. Deposit Refunds

a. The deposit shall be refunded or credited to the customer after not more than 12 consecutive months of prompt payment or 11 timely payments and one automatic forgiveness of late payment, unless the Company has documented information which indicates the deposit is necessary to insure payment.

8. Criteria for Procurement of Deposits

- a. Unacceptable credit report
- b. No previous telephone service
- c. Owes former telephone company a past due amount

EFFECTIVE: February 1, 2008
Date

BY: Terry Wegener , General Manager , Lake Mills, Iowa
Name Title Address

Customer Billing

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART II
Original Sheet 16

Filed with M.P.U.C.

GENERAL RULES AND REGULATIONS

J. DISCONNECTION OR REFUSAL OF SERVICE (Continued)

5. At Customer's Request (Continued)

- b. Where a contract for service with a one-month minimum period is cancelled before establishment of the service is completed, a charge not to exceed the service charge specified, is applied if all or a portion of the facilities have been installed.
- c. No minimum or termination charge will apply (unless otherwise stated specifically in this Tariff) where a new customer takes over the service of the former customer, provided the service is to be furnished at the same location without interruption and that the new customer assumes all unpaid charges on the original contract. Minimum and termination charges will apply for any service furnished under the original contract which is not retained by the new customer.
- d. No minimum or termination charge will apply in the event the service is terminated because of condemnation, destruction, or damage to property by fire or other cause, beyond the control of the customer.

K. PAYMENT FOR SERVICE AND FACILITIES

1. General

- a. Generally all customers shall pay for services and facilities monthly in advance and shall pay for Long Distance Messages, Teletypewriter Exchange Service Messages, and Nonrecurring charges in arrears. Municipal, State or Governmental Agencies may be exceptions to this rule.
- b. Billing to customers shall be scheduled monthly.
- c. All bills for local, long distance or miscellaneous services are due not less than 20 days after the bill is rendered. Residential customers shall be permitted to have the last date for timely payment changeable for good cause in writing.
- d. When a customer is connected or disconnected, or for other cause the service received deviates by more than twenty four consecutive hours from the normal billing period, the bill shall be prorated. If the prorating indicates a refund is due, the refund shall be accomplished by bill credit.
- e. When warranted, in the judgment of the Company, special toll bills may be rendered.
- f. Failure to receive a bill does not relieve the customer of the responsibility for payment.

EFFECTIVE: February 1, 2008
Date

BY: Terry Wegener, General Manager, Lake Mills, Iowa
Name Title Address

Customer Complaints

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART II
Original Sheet 18

Filed with M.P.U.C.

GENERAL RULES AND REGULATIONS

M. NETWORK CONNECTIONS

1. General
 - a. Connections of new inside station wiring to the network shall only be made at the Demarcation Point.
 - b. Such connections shall be made by using a Standard Network Interface and shall be in accordance with Part 68 of the F.C.C. Rules.
 - c. Direct electrical connections at the protector or by-passing the Standard Network Interface shall constitute a violation of this Company's filed tariffs and the service may be disconnected in accordance with its filed Rules and Regulations.
 - d.

This section is still in effect in the Iowa Tariff.

N. CUSTOMER COMPLAINTS

1. General
 - a. A customer or prospective customer may initiate a complaint with the Company on any relevant matter by telephone, in person or in writing directed to the Company at any of its offices. The Company's response to the complaint will generally be in the same form used by the customer. However, the Company may respond to written complaints by telephone or personal visits when it believes such communications will be effective in resolution of the issues.
 - b. The customer may at any point during resolution of the complaint seek review by a Supervisor or Manager.
 - c. Upon investigation and final resolution by the Company, if the customer wishes further review, the customer should direct all appropriate information to the Minnesota Public Service Commission, 7th Floor American Center Building, Kellogg and Robert Streets, St. Paul, Minnesota 55101.

EFFECTIVE: February 1, 2008
Date

BY: Terry Wegener, General Manager, Lake Mills, Iowa
Name Title Address

Disconnection and notices

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART II
Original Sheet 13

Filed with M.P.U.C.

GENERAL RULES AND REGULATIONS

I. MINIMUM CONTRACT PERIODS (Continued)

1. Minimum Contract Period (Continued)
 - b. The Company may require a contract period longer than one month at the same location for unusual construction necessary to meet special demands, and involving extra costs (see Special Type Construction).

J. DISCONNECTION OR REFUSAL OF SERVICE

1. By the Company Without Notice
 - a. The Telephone Company may disconnect or refuse the service without notice:
 - 1) in the event of a condition on the customer's premises determined by the Telephone Company to be hazardous.
 - 2) in the event of customer's use in such a manner as to adversely affect the Telephone Company's facilities or the Telephone Company's service to others. Including but not limited to:
 - a) excessive use of party lines.
 - b) impersonation of another with fraudulent intent.
 - c) listening in on party line conversations.
 - 3) in the event of tampering with facilities furnished and owned by the Telephone Company.
 - 4) in the event of unauthorized use.
2. By the Company After Prior Written Notice
 - a. In addition to the reasons set forth in subparagraph a. above, the Telephone Company may disconnect or refuse service after providing at least five days or in the case of deposits twelve days, prior written notice for any of the following reasons:
 - 1) failure of a customer to make suitable deposit as required by these rules.
 - 2) Use of foul or profane language.
 - 3) The customers bill for local, long distance or miscellaneous services remains unpaid after the last date for timely payment.
 - 4) for failure of the customer or prospective customer to furnish permits or certificates of right-of-way specified to be furnished in the Telephone Company's rules filed with the Commission as conditions for obtaining service, or the termination of those permissions or rights, or for the failure of the customer or prospective customer to fulfill the contractual obligations imposed upon him or her as conditions of obtaining service by a contract filed with and subject to the regulatory authority of the Commission.

EFFECTIVE: February 1, 2008
Date

BY: Terry Wegener, General Manager, Lake Mills, Iowa
Name Title Address

Disconnection and Notice.)

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART II
Original Sheet 14

Filed with M.P.U.C.

GENERAL RULES AND REGULATIONS

J . DISCONNECTION OR REFUSAL OF SERVICE (Continued)

2. By the Company After Prior Written Notice (Continued)

a. (Continued)

- 5) for failure of the customer to permit the Telephone Company reasonable access to its facilities.
 - 6) any other violation of the Telephone Company's rules and regulations on file with the Commission, the requirements of municipal ordinances or law pertaining for the service.
 - 7) when the service (except semi-public service) will be, or is, readily accessible and available for use by the public, by patrons of the customer, or by others not authorized.
- b. Despite the prior written notice provisions as contained in these rules, disconnection may take place prior to the expiration of the notice period if the Telephone Company determines, from verifiable data, that usage during the notice period is so abnormally high that a risk of irrevocable revenue loss is created.
- c. Only one written notice will be provided to the customer if multiple violations occur under subparagraph a. above.
- d. The notice of pending disconnection required by these rules shall be a written notice setting forth all reasons for the notice, and the final date by which the account is to be settled or specific action taken. The notice shall be considered rendered to the customer when deposited in the U.S. mail with postage prepaid. If delivery is by other than U.S. mail, the notice shall be considered rendered when delivered to the last known address of the person responsible for payment for the service. The final date shall be not less than five days after the notice is rendered, or in the case of deposits twelve days. The notice will include a toll-free or collect number where a customer can obtain additional information.
- e. Where written notice is required, the Company will not disconnect service on a weekend, holiday, or after 2:00 P.M. unless the Company is prepared to reconnect service the same day.

EFFECTIVE: February 1, 2008
Date

BY: Terry Wegener, General Manager, Lake Mills, Iowa
Name Title Address

Lifeline and TAP

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART V
1st Revised Sheet 45
Canceling Original Sheet 45

Filed with M.P.U.C.

GENERAL EXCHANGE SERVICES

LIFELINE ASSISTANCE AND MINNESOTA TELEPHONE ASSISTANCE PLAN (TAP)

The Lifeline Assistance program (Lifeline), established by the Federal Communications Commission under 47CFR54, is a means of maintaining and preserving universal service by providing a reduction in the recurring price of telephone, mobile or broadband services to qualifying residential subscribers.

TAP is a state sponsored assistance program under Minnesota Statutes Chapter 237 and is designed to make telephone service accessible to qualifying residential households. Through this program, eligible households will receive a monthly discount on their telephone service.

1. General

- a. Lifeline provides for a federally-funded discount credit to a qualifying residential customer's telephone, mobile or broadband service charges. Monthly Lifeline discounts provided in connection with the Company's local telephone service will first be applied against the subscriber's Federal End User Common Line Charge. Any remaining Lifeline discount amount will then be applied against charges for the subscriber's local phone service.
- b. Federal Universal Service Charge (FUSC) will not be billed to Lifeline customers.
- c. Local service for Lifeline Telephone subscribers may not be disconnected for non-payment of toll charges.
 - 1). Toll Restriction Service will be provided to Lifeline Telephone subscribers at no charge.
 - 2). Lifeline Telephone subscribers are not required to accept Toll Restriction Service as a condition to avoid disconnection of local service for non-payment of toll.
 - 3). Lifeline Telephone subscribers are not required to pay a service deposit in order to initiate service if the subscriber voluntarily elects to receive Toll Restriction Service.
- d. Partial payments from Lifeline Telephone subscribers will be applied first to local service charges and then to toll charges.

2. Eligibility Requirements

- a. Lifeline Assistance will be provided for one (1) eligible service per household, at the subscriber's principal place of residence, to those individuals who meet the eligibility requirements.

EFFECTIVE: March 1, 2017
Date

BY: Mark Thoma General Manager Lake Mills, Iowa
Name Title Address

Lifeline and TAP

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART V
3rd Revised Sheet 45A
Canceling 2nd Revised Sheet 45A

Filed with M.P.U.C.

GENERAL EXCHANGE SERVICES

LIFELINE ASSISTANCE AND MINNESOTA TELEPHONE ASSISTANCE PLAN (TAP) Continued

2. Eligibility Requirements (Continued)

b. The applicant has income at or below 135 percent of the Federal Poverty Guidelines or participates in one of the following programs:

- Medicaid/Medical Assistance
- Supplement Nutrition Assistance Plan (SNAP)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA)
- Veterans Pension Benefit and Survivors Pension

Individuals who do not qualify under any of the above but live on or near a federally recognized reservation may qualify for Lifeline Assistance if the applicant receives benefits from at least one of the following programs:

- Bureau of Indian Affairs General Assistance
- Tribally Administered Temporary Assistance for Needy Families
- Head Start (only for those meeting its income qualifying standard)
- Food Distribution Program on Indian Reservations (FDPIR)

c. The applicant signs a document certifying under penalty of perjury that the applicant receives benefits from one of the programs listed and identifying the program or programs from which that consumer receives benefits.

d. The applicant signs a document agreeing to notify the carrier if that consumer ceases to participate in the program or programs. When the company is notified by the customer that the customer no longer participates in one of the above programs, the federal credits to that customer's monthly charges shall cease beginning with the start of the billing cycle beginning in the month after the month in which notification is received.

3. Eligibility Revocation

If the telephone company discovers that conditions exist that disqualify the recipient of Lifeline Assistance, the consumer will be de-enrolled from the Lifeline Assistance program. The customer will be billed retroactively to whichever is the most recent of the dates Lifeline assistance commenced or the recipient no longer qualified for the service not to exceed 12 months.

4. Eligibility for the State TAP Credit

- a. The state TAP credit is only available to residential subscribers who meet the eligibility requirements for the Federal Lifeline Assistance discount credit in 2 above.
- b. The customer must reside in Minnesota or have moved to Minnesota and intend to remain.

EFFECTIVE: March 1, 2017
Date

BY: Mark Thoma General Manager Lake Mills, Iowa
Name Title Address

Lifeline and TAP):

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART V
Original Sheet 45B

Filed with M.P.U.C.

GENERAL EXCHANGE SERVICES

LIFELINE ASSISTANCE AND MINNESOTA TELEPHONE ASSISTANCE PLAN (TAP) (Continued)

5. Regulations

- a. The Federal Lifeline and state TAP credit will begin at the customer's earliest possible billing cycle but no later than the second billing cycle after the date the application for the Federal Lifeline and state TAP credit is received by the telephone company.
- b. A service charge shall not be billed to establish qualification for either the Federal Lifeline or state TAP credit.
- c. When a customer enrolls for the state TAP credit, the Company is reimbursed for the cost of the service order activity.

6. Funding

The Federal Lifeline credit is funded through the FCC universal service program. The state TAP credit shall be funded through the state Telephone Assistance Plan Surcharge on residence and business access lines which pay the 911 surcharge.

7. Rates

State TAP Surcharge

The surcharge rate is the effective rate ordered by the Minnesota Public Utilities Commission. The Company is responsible for billing, collecting and remitting the surcharge to appropriate government agency.

	<u>Monthly Rate</u>
State TAP Credit	Note 1
Federal Lifeline Credit	Note 2

Note 1: The State TAP Credit is the effective rate ordered by the Minnesota Public Utilities Commission. Information regarding the Credit rate can be accessed at the Minnesota Department of Commerce Web site at: <http://mn.gov/commerce/>

Note 2: The Federal Lifeline Credit is the effective rate ordered by the Federal Communications Commission (FCC). Information regarding the Credit rate can be accessed at the FCC Web site at: <http://www.fcc.gov/>

EFFECTIVE: March 1, 2017
Date

BY: Mark Thoma General Manager Lake Mills, Iowa
Name Title Address

Basic Rates:

WINNEBAGO COOPERATIVE
TELECOM ASSOCIATION
COMPANY

TELEPHONE TARIFF

PART IV
5th Revised Sheet 1
Canceling 4th Revised Sheet 1

Filed with M.P.U.C.

LOCAL EXCHANGE SERVICES

A. GENERAL

Central Office Access Lines extend between the central office equipment of the Company and the demarcation point located on the premises of the customer. Rates for Central Office Access Lines are shown in paragraph B. below. The rates and charges contained herein are in addition to all other applicable rates and charges located in other parts of this tariff.

B. RATES - MONTHLY

Exchange Name	R1	B1	Rotary Trunks	Basic Coin Service
Conger	\$23.00	\$20.00	\$22.50	\$20.00
Emmons	\$23.00	\$20.00	\$22.50	\$20.00
Twin Lakes	\$23.00	\$20.00	\$22.50	\$20.00
North Rake	\$23.00	\$20.00	\$22.50	\$20.00
Albert Lea (CLEC)	\$15.00	\$15.00	\$22.50	\$15.00
Glenville (CLEC)	\$15.00	\$15.00	\$22.50	\$15.00

EFFECTIVE: January 1, 2017
Date

BY: Mark Thoma General Manager Lake Mills, Iowa
Name Title Address

Winnebago MN RDOF Census Block IDs:

270434605002000

270471802003132