



85 7th Place East, Suite 500
St. Paul, Minnesota 55101-2198
mn.gov/commerce/
651.539.1500 FAX 651.539.1547
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December 6, 2013

Burl W. Haar
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/R-13-459

Dear Dr. Haar:

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

Possible Amendment to Rules Concerning White Pages Directory Publication and Distribution.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ KATHY DOHERTY
Public Utilities Rate Analyst

/s/ DIANE DIETZ
Public Utilities Rate Analyst

KD/DD/lt
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

REPLY COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. P999/R-13-459

I. BACKGROUND

On October 11, 2013, the Minnesota Public Utilities Commission (Commission) issued a notice of comment period on amendments to the rules governing the publication and distribution of white pages directories in Minn. Rules pts. 7810.2900, 7811.0600, and 7812.0600.

II. STATUTORY AUTHORITY

The Commission's statutory authority to adopt rules is set forth in Minn. Stat. §§216A.05 and 216B.08.

The Administrative Procedure Act, Minn. Stat. Ch. 14, requires the Commission to establish the need for the proposed rules by an affirmative presentation of facts. Minn. Stat. §§14.14 subd. 2 and 14.23.

III. COMMENTS

A. Minn. Rules pt. 7810.0100, subp. 11a. Complete Directory

The Commission proposes to introduce the following definition for "Complete Directory" in Minn. Rules pt. 7810.0100 (Definitions), subp. 21:

"Complete directory" means a directory that includes the information compiled under Rule 7810.2900, subpart 1, whether printed, electronically published, or some combination thereof. A complete directory includes, but is not limited to:

- A. printed or electronically published business and residential listings; or
- B. a printed subset of exchanges in a local calling area relevant to customers in a particular geographic area or community of interest, and publication of the remainder of the local calling area either electronically or in separate printed volumes.

The proposed definition of “complete directory” permits a local exchange carrier to meet the requirements of the directory rules by either publishing one comprehensive (electronic or printed) directory or by publishing a set of smaller directories (either printed or electronic or some combination thereof) that is also, taken together, comprehensive. The Department supports the flexibility provided by this definition.

B. Minn. Rules pt. 7810.0100, subp. 26a. Local Service Provider

The Commission proposes to introduce the following definition for “Local Service Provider” in Minn. Rules pt. 7810.0100 (Definitions), subp. 26a:

“Local Service Provider” or “LSP” means a telephone company or telecommunications carrier providing local service in Minnesota pursuant to a certificate of authority granted by the commission. Local service provider includes both local exchange carriers and competitive local exchange carriers.

The intent of introducing this new definition in the rules is not clear. The term “Local Exchange Carrier” as defined in MS 237.01 subd. 8 covers the same set of companies that are to be subject to the directory requirement as the newly defined “local service providers”. The law and rules will be less confusing if there are not multiple terms with the same meaning. Unless the intent is for “Local Service provider” to have a different meaning than “Local Exchange Carrier,” the Department recommends using the term “Local Exchange Carrier.”

C. Minn. Rules pt. 7810.2900 Form and Content of Directories, Subpt. 1, Basic Requirements

The Commission proposes to introduce the following basic requirements for directories in Minn. Rules pt. 7810.2900, subpt. 1:

Telephone directories shall be regularly compiled and shall contain each customer’s name, telephone number, and, if practical, address, except they shall not contain public telephone numbers or telephone numbers that are unlisted at the customer’s request. Upon issuance, a local service provider shall distribute to all customers served by that directory a complete directory consistent with the customer option provisions of Rule 7810.2950. Upon commission request, a local service provider shall furnish to the commission a copy of each directory issued, whether printed or electronic.

The proposed rule enumerating the basic requirements for form and content of directories contains adequate detail to provide the necessary direction to local exchange carriers in order to

satisfactorily address the needs of customers. The Department recommends a minor revision to Minn. Rules pt. 7810.2900, subpt. 1 to replace the word “compiled” with the phrase “compiled and published.” It is not only necessary to regularly compile (i.e., to collect and gather data) directory listings, but also to publish (i.e., to prepare and issue material for public distribution) the updated listings. Telephone directories are most useful when they are regularly published with up-to-date information.

It is also not clear what is meant by the term “public telephone numbers” in the proposed rule. This appears to be addressing numbers associated with “public telephone service,” as defined in Minn. Rule pt. 7810.0100, subpt. 31. If so, the proposed rule could provide a reference to the term “public telephone service” to eliminate any ambiguity.

The Department recommends that Minn. Rules pt. 7810.2900, subpt. 1 read as follows:

Telephone directories shall be regularly compiled and published and shall contain each customer’s name, telephone number, and, if practical, address, except they shall not contain public telephone numbers assigned to public telephone service (as defined in Minn. Rule pt. 7810.0100, subpt. 31) or telephone numbers that are unlisted at the customer’s request. Upon issuance, a local exchange carrier shall distribute to all customers served by that directory a complete directory consistent with the customer option provisions of Rule 7810.2950. Upon commission request, a local exchange carrier shall furnish to the commission a copy of each directory issued, whether printed or electronic.

D. Minn. Rules pt. 7810.2900 Form and Content of Directories, Subpt. 2, Printed Directories

The Commission proposes to revise the requirements for printed directories in Minn. Rules pt. 7810.2900, subpt. 2 as follows:

~~Telephone directories shall be regularly published, listing the name, address when practical, and telephone number of all customers, except public telephones and numbers unlisted at customer's request. The name of the telephone utility, the area included in the directory, the year and month of issue, shall appear on the front cover. Information pertaining to emergency calls such as for the police and fire departments shall appear conspicuously in the front part of the directory pages. The directory shall contain such instructions concerning placing local and long distance calls, calls to repair and directory assistance services, and location of telephone company business offices as may be appropriate to the area served by the directory. Upon issuance, a copy of each directory shall be distributed to all customers served by that directory and a copy of each directory shall be furnished to the commission, upon request.~~

Printed directories shall:

- A. display on the front cover the name of the local service provider, the area included in the directory, and the year and month of issue;

- B. display in the front portion of the directory information pertaining to emergency calls, including information for police and fire departments; and
- C. contain instructions, appropriate to the area served by the directory, concerning placing local and long distance calls, calls to repair and directory assistance services, calls to local, state, and federal government offices, and the location of telephone company business offices;

The proposed revisions to the requirements relating to the form and content of printed directories in Minn. Rules pt. 7810.2900, subpt. 2 serve to provide clear and understandable guidance for companies publishing printed directories for their customers. The Department recommends the following addition to the requirements:

- D. display on the front cover the availability of, and how to access, any electronic complete directory for residential and/or business listings.

The Department notes that the term “local exchange carrier,” will need to be used instead of “local service provider” if the Commission agrees that there is no need to introduce the new definition into the rules.

E. Minn. Rules pt. 7810.2900 Form and Content of Directories, Subpt. 3, Electronically Published Directories

The Commission proposes to introduce the following requirements for electronically published directories in Minn. Rules pt. 7810.2900, subpt. 3:

Electronically published directories shall:

- A. display the name of the local service provider, the area included in the directory, and the date the directory information was last updated;
- B. display information pertaining to emergency calls, including information for police and fire departments, prior to each directory search;
- C. contain instructions, appropriate to the area served by the directory, concerning placing local and long distance calls, calls to repair and directory assistance services, calls to local, state, and federal government offices, and the location of telephone company business offices;
- D. be prominently displayed on, and accessible to customers from, the company’s website; and,
- E. prohibit automated remote access, including but not limited to automated remote access made by a search engine indexer or data aggregator.

The proposal for Minn. Rules pt. 7810.2900, subpt. 3 appears to be intended to provide customers with access to the same or similar information as that which has been available in the printed directories. Differences between printed and electronic directories should, however, be considered in establishing regulations for each of these mediums.

Subsection B above, for example, requires that electronic directories display information pertaining to emergency calls *prior to each directory search*. With printed directories, it is of little consequence to customers to flip past the emergency and government contact information if they simply want to reach residential or business listings. When using an electronic directory, however, a customer may be inconvenienced or annoyed by having to navigate through the emergency contact information each time the customer wishes simply to access an individual business or residential listing.

The Department recommends that carriers be directed to make a general reference to emergency contact information in a prominent location on their websites or other electronic directory, so that customers are not required to navigate through the emergency contact information before each individual search of the electronic directory. The Department recommends that Minn. Rules pt. 7810.2900, subpt. 3. B. be revised as follows:

- B. Display information pertaining to emergency calls in a prominent location on the local exchange carrier's electronic directory.

The Department also recommends that the Commission clarify or delete the proposal in 7810.2900 subpt 3. E. that electronic directories “prohibit automated remote access, including but not limited to automated remote access made by a search engine indexer or data aggregator.” The proposed rule recognizes that electronic directory listings may potentially be used by indexers or data aggregators. However, sharing of (published) subscriber lists between telephone exchange carriers that publish directories and other directory publishers, upon request, is required by 47 U.S.C. 222(d).

Federal rules do not appear to require telephone exchange carriers that publish directories to share that (published) information with other persons for marketing purposes. 47 USC 251 pertains to interconnection between telephone companies and reflects the obligation to provide non-discriminatory access (to telephone numbers, operator services, directory assistance services, and directory listings) to “competing providers.” 47 C.F.R 51.217(a)(1) defines a “competing provider” as a provider of telephone exchange or telephone toll services that seeks nondiscriminatory access from a local exchange carrier (LEC) in that LEC's service area. 47 CFR 51.217 (2) (b) states that a local exchange carrier (LEC) that provides operator services, directory assistance services or directory listings to its customers, or provides telephone numbers, shall permit competing providers of telephone exchange service or telephone toll service to have nondiscriminatory access to that service or feature.

Finally, it should be clear that the Commission's rules with respect to electronic directories are applicable to all electronic directories to which a local exchange carrier directs its customers.¹ The company responsible for meeting the requirements of the rule must ensure that any website or other electronic medium from which consumers access the directory complies with all of the rule requirements. The Department recommends that the Commission add another provision to this section that reads as follows:

¹ Qwest Corporation's directory publisher, DEX, for example, currently has at least two available on-line “directory” websites: DEXknows.com and DEXpages.com, which function differently, are formatted differently, and appear to have different capabilities and purposes with respect to marketing, advertising, and tracking of website visits.

- Any electronic directory to which a local exchange carrier directs its customers must comply with the provisions of the rule.

F. Minn. Rules pt. 7810.2950 Directories: Customer Option, Subpt. 1, Customer Option

The Commission proposes to introduce the following requirements for optional distribution of directories in Minn. Rules pt. 7810.2950, subpt. 1:

A Local Service Provider may publish printed or electronic directories, or some combination thereof. Local service providers that do not intend to electronically publish directories shall distribute a printed directory to each customer, except where an offer is made and explicitly refused by the customer. A Local Service Provider that publishes an electronic directory must deliver a printed directory if that is the customer's format preference. Local service providers shall make available a complete directory to each customer, and shall:

- A. conduct an initial survey of existing customers' directory format preference prior to any directory format change;
- B. present each new customer an opportunity to establish a directory format preference;
- C. permit a customer to establish or change their directory format preference at any time;
- D. annually notify customers of the directory format preference on record and how to change it;

Minn. Rules pt. 7810.2950, subpt. 1 establishes guidelines for local exchange carriers intending to ensure that customers are adequately informed of their directory options to enable them to make timely and informed choices. While an informed choice by consumers is important, the process in the proposed rule will result in another customer list being established, which then has the potential to be used by the directory publisher for purposes not intended by the customer. The privacy of consumers can be better achieved if a list of customer's directory preference is not required. Further, to obtain a directory, the customer should not be required to provide any information other than an address for delivery of the printed directory or other portable physical media. The customer name, telephone number, etc. serves no purpose other than to create a list that may be used for marketing purposes. Particularly in the case of customers who purchases non-published numbers, any requirement that the customer disclose their personal information to obtain a directory could eviscerate the privacy gained through non-publication.

If the local exchange carrier chooses to satisfy the complete directory requirement with an electronic directory, the Department believes it is sufficient to have a process where the customer is provided with adequate information to know that an electronic directory is available and instructions on how it may be accessed, and that a printed directory is available upon request. The information provided to the customer to enable the customer to request a directory would need to be made available each time a new directory is published. Further, the customer using the electronic directory should not be required to disclose personal information to use the electronic directory. The Department supports modifying Minn. Rules pt. 7810.2950, subpt. 1 as follows:

Minn. Rules pt. 7810.2950, subpt. 1:

~~A Local Service Provider~~ local exchange carrier may publish printed or electronic directories, or some combination thereof. ~~Local service providers~~ Local exchange carriers that do not intend to electronically publish directories shall distribute a printed directory to each customer, except where ~~an offer is made and~~ explicitly refused by the customer. A local exchange carrier that publishes a complete electronic directory shall, upon issuance of a new directory, provide notice to customers of the availability of an electronic directory and instructions on how it may be accessed, and that a printed directory is available upon request. ~~A Local Service Provider~~ local exchange carrier that publishes an electronic directory must deliver a printed directory if requested by ~~that is the customer's format preference~~. Local exchange carriers ~~service providers~~ shall make available a complete directory to each customer, and shall:

- ~~A. conduct an initial survey of existing customers' directory format preference prior to any directory format change;~~
- ~~B. present each new customer an opportunity to establish a directory format preference;~~
- ~~C. permit a customer to establish or change their directory format preference at any time;~~
- ~~D. annually notify customers of the directory format preference on record and how to change it;~~
 - A. Not require customers to divulge any personally identifiable information, other than their delivery address, in order to request a complete directory that is printed or contained on portable physical media.
 - B. Not require consumers to create an account, log in, or otherwise provide any personally identifiable information in order to access an electronic complete directory.
 - C. Not obtain, use or retain any personally identifiable information as a result of customer use of any electronic complete directory.

G. Minn. Rules pt. 7810.2950 Directories: Customer Option, Subpt. 2, When No Customer Option is Specified

The Commission proposes to introduce the following requirements for distribution of directories when the customer does not specify an option in Minn. Rules pt. 7810.2950, subpt. 2:

Local service providers shall determine whether customers who do not state a directory format preference will receive a printed directory, have access to an electronically published directory, or a combination thereof. Local service providers shall notify customers how the complete directory will be provided, including how to access any electronically published portion.

If the Commission accepts the Department's recommendations for Minn. Rules pt. 7810.2950, subpt. 1, then there is no need for this section of the rules. Companies would not be maintaining a list of customer directory preferences. The Department recommends that this section of the proposed rule be eliminated if the Commission accepts its recommendations for Minn. Rules pt. 7810.2950, subpt. 1.

H. Minn. Rules pts. 7811.0600 and 7812.0600 Basic Service Requirements, Subpts. 1.F Required Services

The Commission proposes the following revisions to the basic service requirements applicable of local exchange carriers in Minn. Rules pts. 7811.0600 and 7812.0600, subpts. 1.F.:

One ~~white pages~~ complete directory per year ~~for each local calling area~~, which may include more than one local calling area, consistent with the customer option provisions of part 7810.2950 and, upon a customer request and in the customer's preferred format, one copy of any other directory within the local calling area. ~~or except where an offer is made and explicitly refused by the customer~~

The Department understands that the proposed revisions to Minn. Rules pt. 7811.0600 and 7812.0600, subpts. 1.F intend to provide for customers obtaining access to additional printed directories for other geographic areas that may exist within the customers local calling area. Only printed directories appear to be applicable in this provision since electronic directories are available to anyone, anywhere, with access to the internet.

The Department recommends revising Minn. Rules pt. 7811.0600 and 7812.0600, subpts. 1.F as follows:

One ~~white pages~~ complete directory per year ~~for each local calling area~~, which may include more than one local calling area, consistent with the customer option provisions of part 7810.2950. In addition, upon a customer request, the local exchange carrier must provide one copy of any other complete directory on printed or portable physical electronic media for each geographic area within the customer's local calling area. ~~or except where an offer is made and explicitly refused by the customer~~

/lt

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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/R-13-459**

Dated this **6th** day of **December, 2013**

/s/Linda Chavez

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mike	Allentoff		Global Crossing	225 Kenneth Dr. Rochester, NY 14623-4277	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Mark J.	Angell		Angell And Associates	1075 Rosewood Drive Grapevine, TX 76051	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Deborah S.	Arnott		IG2, Inc.	5018 196th Street Fresh Meadows, NY 113651319	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Dirk	Berger	dberger@bevcomm.com	BEVCOMM Eckles Telephone Company	115 Main Street W. New Prague, MN 56071	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
David	Bickett		Park Region Mutual Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Bickett		Valley Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Clements Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Birkholz	N/A	Peoples Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Melrose Telephone Company	150 Second St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Osakis Telephone	150 2nd St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Home Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Mainstreet Communications, LLC	150 Second St. SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Birkholz	N/A	Redwood County Telephone Company	160 Second Avenue SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Nancy	Blankenhagen	nancyblankenhagen@nu-telcom.net	New Ulm Telecom Inc.	P.O. Box 697 27 N. Minnesota Street New Ulm, MN 560730697	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Tim	Brinkman	tim.brinkman@parkregion.com	Park Region Mutual Telephone Co.	100 Main Street PO Box 277 Underwood, MN 56586	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Diane	Browning	diane.c.browning@sprint.com	Sprint Nextel	KSOPHN0314-3A459 6450 Sprint Pkwy Overland Park, KS 66251	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Danny	Busche	dannyb@means.net	Minnesota Valley Telephone Company	318 Second Ave East P O Box 310 Franklin, MN 55333-0310	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Lance	Casey	lance.casey@consolidated.com	Consolidated Communications	N/A	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Cathy	Clucas	cathy.clucas@centurylink.com	CenturyLink	200 South 5th St Room 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Regulatory	Contact	wci.regulatory@windstream.com	Windstream Communications, Inc.	600 Willowbrook Office Park Fairport, NY 14450	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Rod	Cox	rod.cox@tdsmetro.com	TDS Metrocom	Suite 6000 525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Louie	DeCarlo	bademaillouie.decarlo@mci.com	MCI metro Access Transmission Services	9th Floor 201 Spear Street San Francisco, CA 94105	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Daryl	Ecker	daryl.ecker@parkregion.com	Park Region Mutual Telephone Co.	P.O. Box 277 Underwood, MN 56586	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Mark	Erickson		City Of Lakefield	301 Main Street PO Box 1023 Lakefield, MN 561500900	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christianson	Farms			RR 2 Miltona, MN 56354	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Jeffrey	Feldman	jfeldman@everestv.com	FTTH Communications L.L.C.	c/o EveresTV Two Executive Drive, Ste 635 Fort Lee, NJ 07024	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Charles	Forst	charles.forst@zayo.com	Zayo Group, LLC	400 Centennial Pkwy Ste 200 Louisville, CO 80027	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Susan	Freeman		Network Operator Services, Inc.	P.O. Box 3529 Longview, TX 75606	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Paul	Fuglie		Verizon Select Services	HQE01H21 600 Hidden Ridge Irving, TX 75038	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Wayne	Gandy		Encompass Communications, LLC	Suite 286 119 West Tyler Street Longview, TX 75601	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Bill	Garcia	bill.garcia@windstream.com	Windstream	1800 Old Pecos Trail, Suite J Santa Fe, NM 87505	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Lisa	Goldenberg	lisa@cicom.net	Coast Internatinal, Inc.	14303 West 95TH Street Lenexa, KS 66215	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward H.	Griffin		US LEC Communications, Inc.	6801 Morrison Blvd. Charlotte, NC 28211	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Donna	Gunderson		Johnson Telephone Company	205 1st Avenue NE PO Box 39 Remer, MN 56672	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Mary	Haberek	mhaberek@ami.net	AMI Communications, Inc.	300 Cardinal Drive, Suite 280 St. Charles, IL 60175	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Robert L.	Hammond, Jr.	N/A	BEVCOMM, Inc.	123 W 7th St Blue Earth, MN 56013-1309	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
JoAnn	Hanson	joann.hanson@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Bruce	Hanson	N/A	Zumbrota Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
William	Heaston	bill.heaston@sdncommunications.com	PrairieWave Telecommunications, Inc.	2900 W. 10th Street Sioux Falls, SD 57104	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Ted	Heckmann	ted.Heckmann@cinbell.com	Cincinnati Bell Any Distance, Inc.	P.O. Box 2301 221 E. Fourth Street, 1280 Cincinnati, OH 45201-2301	Electronic Service 03-	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jerry	Heiberger	jerry.heiberger@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Andy	Hennis	andyh@chriscomco.net	Christensen Communications Company	104 West Main Street Madelia, MN 56062	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Pamela	Hintz		One Communications	5 Wall Street Burlington, MA 1803	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Scott	Hoffmann	hoffmann@wins.net	Wisconsin Independent Network, LLC	Box 107 800 Wisconsin Street Eau Claire, WI 547033612	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Paul	Hoge	phoge@crosslake.net	Crosslake Communications	35910 County Road 66 PO Box 70 Crosslake, MN 56442	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kevin	Hopkins	khopkins@telephoneassociates.com	Telephone Associates, Inc.	329 Grand Ave Superior, WI 54880	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Rich	Horner		Guaranteed Phone Service	#1 2201 West Broadway Council Bluffs, IA 51501	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Karen	Hyde	karen.hyde@level3.com	Level 3 Communications	200 Technology Drive Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kevin	Larson	klarson@ctctelcom.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Larry	Laskowski		Network Billing Systems	155 Willowbrook Blvd Wayne, NJ 7470	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
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	No	OFF_SL_13-459_R-13-459 Service List
Mary	Lohnes	mary_lohnes@mmi.net	Midcontinent Communications	3600 Minnesota Dr Ste 700 Edina, MN 55435	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Bill	Loonan		Lismore Coop. Telephone Co.	PO Box 127 Lismore, MN 56155	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Lee	Maier	lee@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
James	Mancuso	jmancuso@clearworld.net	Clear World Communications	3501 South Harbor Blvd. Suite 200 Santa Ana, CA 92704	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Thomas	Margavio	tm5886@att.com	BellSouth Long Distance, Inc.	AT&T Midtown Center 675 W Peachtree Ste 17E21 Atlanta, GA 30375	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Francie	McComb		Talk America, Inc.	2134 W. Laburnum Ave. Richmond, VA 232274342	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Laura	Messina		CIMCO Communications, Inc.	Suite 700 1901 South Meyers Road Oakbrook Terrace, IL 601815211	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Shelby	Michlin		Network Billing Systems, LLC	155 Willowbrook Blvd. Wayne, NJ 7470	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Monty	Morrow	montymorrow@nu-telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Karen	Nations		AboveNet Communications, Inc.	360 Hamilton Avenue White Plains, NY 10601	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Nelson	davidnelson@kpcoop.com	Kandiyohi Power Cooperative	P.O. Box 40 8605 47th Street NE Spicer, MN 562880040	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Michael	Nelson	Michael_Nelson@cable.comcast.com	Comcast Corp.	183 Inverness Drive West Englewood, CO 80112	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Daniel C.	Nelson	dcndtc@bevcomm.net	Dunnell Telephone Company, Inc.	PO Box 42 110 N Seeley Ave Dunnell, MN 56127	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Financial	Officer		Emily Cooperative Telephone Company	P.O. Box 100 Emily, MN 564470100	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Bill	Otis	billotis@nu-telcom.net	New Ulm Telecom, Inc.	PO Box 697 27 North Minnesota St New Ulm, MN 56073-0697	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bill	Otis	N/A	Sleepy Eye Telephone Co.	27 N. Minnesota Street PO Box 697 New Ulm, MN 56073	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Gloria	Pederson	gpederson@bevcomm.com	Cannon Valley Telephone, Inc.	123 West Seventh Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Rochelle	Pervisky	RPervisky@exchange.hbci.com	Hiawatha Broadband	58 Johnson Street Winona, MN 55987	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Dean	Polkow		Rural Cellular Corporation	PO Box 2000 3905 Dakota Street Southwest Alexandria, MN 563082000	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Angel	Reinhart	bademail143INHART@NEUTRALTANDEM.COM	Broadwing Communications, LLC	200 N. LaSalle, 10th Floor Chicago, IL 60601	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25 Wawina, MN 557369721	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Judith A	Riley	jriley@telecompliance.net	Mosaic Networx LLC dba MX NETWORK	PO Box 720128 Oklahoma City, OK 73172-0128	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carey	Roesel		Technologies Management, Inc.	PO Drawer 200 Winter Park, FL 327900200	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Steve	Roussos	N/A	Convergia, Inc.	237 Hymns Blvd Pointe Claire, Quebec H9R 5C7 CANADA	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Marc	Rozar		Custom Network Solutions, Inc.	Suite 102 210 E Route 4 Paramus, NJ 76525103	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Sheldon	Sagedahl	sheldons@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Jill	Sandford	jill.sandford@zayo.com	Zayo Group, LLC	360 Hamilton Avenue White Plains, NY 10601	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Jeff	Schill	jeff.schill@netins.com	Iowa Network Services Inc	4201 Corporate Drive West Des Moines, Iowa 50266	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
David	Schornack	N/A	Loretel Systems, Inc.	150 Second Street SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Schornack	N/A	Felton Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
David	Schornack	N/A	Arrowhead Communications Corporation	150 Second Street SW Perham, MN 56573	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Schornauk		Unitel Communications	P.O. Box 151 Park Rapids, MN 55470	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
James	Seliga	N/A	FTTH Communications L.L.C.	2930 146th St Ste 105 Rosemount, MN 55068	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Janett	Smith		Touch 1 Communications, Inc.	100 Brookwood Road Atmore, AL 36502	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Don	Snyders	don@alliancecom.net	Alliance Communications Cooperative, Inc.	PO Box 349 612 Third St Garretson, SD 57030	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Kate	Stem	kate.stem@accesspointinc.com	Access Point, Inc.	1100 Crescent Green, Ste. 109 Cary, NC 27518	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Paul	Stowman	paul@rothsay.us	Rothsay Telephone Company	PO Box 158 137 1st St NW Rothsay, MN 56579-0158	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Ronald	Streyle	ronstreyle@juno.com	Rochester Telecom Systems, Inc.	PO Box 235 Rochester, MN 559030235	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East Cedar P.O. Box 360 Houston, MN 559430360	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Loretta	Tastad	loretta.tastad@arvig.com	East Otter Tail Telephone Company	150 2nd Street SW Perham, MN 56573	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Mike	Theisen		Northern Minnesota Utilities	910 Cloquet Ave. Cloquet, MN 55720	Paper Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Carl	Thompson		PromiseVision Technology, Inc.	#212 1050 E 2nd Edmond, OK 73034	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
William	VanderSluis	N/A	CP Telecom	209 W 1st St Duluth, MN 55802	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Dana	Wahlberg	dana.wahlberg@state.mn.us	Department of Public Safety	Town Square Ste 137 444 Cedar St St. Paul, MN 551015126	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Jerry	Watts	jerry.watts@corp.earthlink.com	EarthLink	Suite 106 3000 Columbia House Blvd. Vancouver, WA 98661	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
Avi	Weisman		Gold Line Telemanagement Inc.	180 West Beaver Creek Rd Richmond Hill, ON L4B 1B4 CANADA	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Donna	White		Law Office Of Lance J.M. Steinhart	Suite 250 1720 Windward Concourse Alpharetta, GA 300052293	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Sandra	Williams	sandrawilliams@netoneint.com	Net One International, Inc.	6933 University Blvd. Winter Park, FL 32792-6707	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
W. Don	Williams		Comdata Telecommunications Services	5301 Maryland Way Brentwood, IN 37027	Paper Service	No	OFF_SL_13-459_R-13-459 Service List
Lyle R.	Williamson	Lyle.Williamson@Verizon.com	Verizon Wireless	8350 E Crescent Pkwy Ste 200 Greenwood Village, CO 80111	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List
David	Wolf	dwolf@gctel.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_13-459_R-13-459 Service List