

May 7, 2019

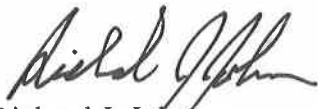
Mr. Daniel P. Wolf
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of the Petition of Lake County for Relinquishment of ETC Designation
MPUC Docket No.: P6944/RL-19-195

Dear Mr. Wolf:

Enclosed via eFiling, please find the Notice of Termination by Contel Systems, Inc. in the above-entitled docket. In addition, enclosed is a Certificate of Service.

Very truly yours,



Richard J. Johnson
Attorney at Law
(612) 877-5275
Rick.Johnson@lawmoss.com

RJJ/keb

Enclosures

cc: Parties of Record
4695220v1

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

Katie Sieben	Chair
Dan Lipschultz	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of the Petition of Lake County for Relinquishment of ETC Designation MPUC Docket No: P6944/RL-19-195

NOTICE OF TERMINATION BY CONTEL SYSTEMS, INC.

Contel Systems, Inc. (“CSI”) respectfully submits this notice of the termination of CSI’s contractual relationship with Lake County, Minnesota d/b/a Lake Connections (“Lake County”) to provide assistance to Lake County in providing Voice over Internet Protocol (“VoIP”) telephone service in the portions of Lake County and Cook County in which certain network facilities owned by Lake County are located.

On February 18, 2019, Lake County, CSI and Pinpoint Minnesota, LLC (“Pinpoint”) signed a Termination Agreement, which terminates the Transport Agreement between Lake County and CSI dated January 24, 2017 (“Transport Agreement”), with the termination to be effective on the closing date of the Asset Purchase Agreement between Lake County and Pinpoint described in that Termination Agreement. On March 8, 2019, Lake County informed CSI that Lake County was also exercising its right to terminate the Management Agreement between Lake County and CSI dated January 24, 2017 (“Management Agreement”), with the termination also to

be effective on the closing date of the Asset Purchase Agreement between Lake County and Pinpoint. The March 8, 2019 letter is attached as Exhibit 1 for the Commission's information.

Upon termination of the Transport Agreement and Management Agreement, CSI will lack the facilities needed to continue to assist Lake County in providing VoIP service to customers in the portions of Lake County and Cook County in which certain network facilities owned by Lake County are located.

The Termination Agreement provides that residential VoIP customers will transition to Pinpoint within 3 days of the closing of the Asset Purchase Agreement between Pinpoint and Lake County and that business VoIP customers will transition to Pinpoint within 60 days of the closing of that agreement. CSI understands that Pinpoint has entered into an arrangement with Zito West Holding, LLC to provide operations management to Pinpoint. Notice of the change in ownership and service arrangements, in the form of Exhibit 2 attached, has been provided to customers.

CSI appreciates the opportunity to provide this information to the Commission and will provide further information if needed.

Dated: May 7, 2019

Respectfully submitted,



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Attorneys on Behalf of Contel Systems, Inc.



Exhibit 1

**Matthew Huddleston
County Administrator**

Lake County Service Center
Office of the County Administrator
616 Third Avenue
Two Harbors, MN 55616

Office Phone: 218-834-8320
Facsimile: 218-834-8360

Email: matthew.huddleston@co.lake.mn.us

March 8, 2019

Consolidated Telephone Company
Attn: Kristi Westbrook
1102 Madison Street, PO Box 972
Brainerd, MN 56401

RE: Sales Agreement dated February 1, 2017 and Management Agreement dated January 24, 2017 (collectively, the "Agreement") between Consolidated Telephone Company and County of Lake, Minnesota (the "County")

Ladies and Gentlemen:

This letter is to advise you that the County has entered into an Asset Purchase Agreement to sell all of the Assets which are owned and used by the County in the operation of the Lake Connections Network to Pinpoint Minnesota LLC, a Delaware limited liability company (the "Transaction").

As we have discussed, we are providing you with notice to terminate the Agreement (the "Termination") effective as of the closing of the Transaction. We anticipate that the Transaction will close on or about June 1, 2019 (the "Closing Date"). However, the Closing Date is subject to change and the County requests that the Agreement remain in full force and effect until the Transaction is closed.

If you have any questions, please contact me at either 218-834-8320 or matthew.huddleston@co.lake.mn.us.

Very truly yours,

COUNTY OF LAKE, MINNESOTA

Matthew Huddleston, Lake County Administrator



IMPORTANT INFORMATION ABOUT YOUR SERVICE

Dear Lake Connections Customer:

Lake County has entered into an agreement that will lead to the sale of its cable and broadband communications system, Lake Connections, to Pinpoint Minnesota, LLC ("Pinpoint"). Following completion of the transaction, which is expected to be completed on or after June 3, 2019, the services that you currently receive from Lake County will be provided by Pinpoint. Pinpoint and its operations manager, Zito West Holding, LLC ("Zito"), a leading provider of cable, broadband and voice communications services, pride themselves on their ability to build long-term relationships with their customers and they look forward to serving you.

You are not required to do anything to continue receiving the high-quality services you have come to expect at the same competitive rates you currently pay. There will be no charges associated with the transfer of your account to Pinpoint.

Pinpoint is dedicated to earning and keeping your business. We are confident that this transaction will strengthen and improve the high quality of services that you currently receive from Lake County. That said, you have the right to change providers at any time, provided another service provider is available, and subject to the terms of your service contract, if you have one. If you do want to select another provider, you should contact that provider directly. Assuming you do not transfer your service to a different provider by June 3, 2019, Pinpoint will become your service provider thereafter.

If you choose to stay with Pinpoint and you currently receive phone service over the Lake Connections network, your telephone number will not change as a result of the transfer. Notice of any future changes in rates, terms and conditions of service will be provided to you by mail or in your bill in the format that you currently receive it, or as otherwise provided in your service contract, if you have one. In addition, any deposit or prepayment you have paid, if any, will be transferred with your account to Pinpoint. If you have arranged a preferred carrier freeze with Lake County with respect to any services involved in this transfer, this freeze will be lifted in order to transition the services to Pinpoint; following the transfer, you must contact your new local provider to reinstate the freeze.

Prior to the actual transfer of service, Lake County will continue to be responsible for all customer service inquiries, complaints, billing issues and service questions, and you should contact the Lake Connections customer services representatives at the following number: 1-888-262-7971. You may also contact Pinpoint's manager, Zito at: 1-800-365-6988.

Lake Connections thanks you for your business in the past and Pinpoint looks forward to providing you with superior products and services for many years to come.

Sincerely,

Lake County and Pinpoint Minnesota, LLC

CERTIFICATE OF SERVICE

In the Matter of the Petition of Lake County
for Relinquishment of ETC Designation

MPUC Docket No.: P6944/RL-19-195

Karen E. Berg certifies that on the 7th day of May, 2019, she filed a true and correct copy of the **Notice of Termination by Contel Systems, Inc.**, by positing it on www.edockets.state.mn.us. Said document was also served via U.S. Mail and e-mail as designated on the Official Service List on file with the Minnesota Public Utilities Commission and attached hereto.

/s/ Karen E. Berg

Karen E. Berg

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Auerbach	jauerbach@somos.com	NANPA/Somos, Inc.	1800 Sutter St Ste 780 Concord, CA 94502	Electronic Service	No	OFF_SL_19-195_RL-19-195
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_19-195_RL-19-195
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_19-195_RL-19-195
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-195_RL-19-195
David	Denton	david.denton@state.mn.us	DPS ECN	445 Minnesota Street Suite 137 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-195_RL-19-195
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_19-195_RL-19-195
Pete	Eggimann	PEGGIMANN@MN-MESB.ORG	Metropolitan Emergency Services Board	2099 University Ave W Ste 201 St. Paul, MN 551043431	Electronic Service	No	OFF_SL_19-195_RL-19-195
Michelle	Garber	mgarber@usac.org	USAC - Universal Service Administrative Company	2000 L St NW Ste 200 Washington, DC 20036	Electronic Service	No	OFF_SL_19-195_RL-19-195
Gregory R.	Merz	gregory.merz@gpmlaw.com	Gray, Plant, Mooty	80 S 8th St Ste 500 Minneapolis, MN 55402-5383	Electronic Service	No	OFF_SL_19-195_RL-19-195
Beth	Sprague	bsprague@somos.com	NANPA/Somos, Inc.	2411 Dulles Corner Park Ste 250 Herndon, VA 20171	Electronic Service	No	OFF_SL_19-195_RL-19-195

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-195_RL-19-195
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_19-195_RL-19-195
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_19-195_RL-19-195