

January 15, 2015

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

RE: In the Matter of the Application of CenturyLink Public Communications, Inc. or a Certificate of Authority to Provide Facilities-based Competitive Local Exchange Service Limited to the provision of Inmate Calling Services  
Docket No. P6939/NA-14-959

Dear Mr. Wolf:

Applications for certificates of authority may be approved without hearing under Minn. Stat. § 216A.03, subd. 7. The Public Utilities Commission's (Commission's) Order designating certain applications for certificates of authority as being subject to a standing Order was issued on August 25, 2000 in Docket No. P999/CI-00-634. The use of a standing Order is to apply to filings submitted on or after September 1, 2000.

As required by the Commission's August 25, 2000 Order, the Department of Commerce (Department) has reviewed and analyzed the current filing. Attached is the Department's checklist for processing applications for certificates of authority. The checklist reflects the Department's analysis of the issues relating to the requirements of Minnesota law and the Commission's rules.

*The application for certification was filed on:* November 6, 2014

*The application was filed by:*

Jennifer Roubique  
100 CenturyLink Drive  
Monroe, LA 71203  
[Jennifer.Roubique@CenturyLink.com](mailto:Jennifer.Roubique@CenturyLink.com)

*The application requested the following type of certification:* Certificate of Authority to provide Facilities – Based Local Exchange Service limited to the provision of Inmate Calling Service.

The Department's checklists for the application for certification and the proposed tariff are attached to this letter.

If the Company ever chooses to provide local service other than inmate service, it must then fulfill all the requirements applicable to competitive local exchange carriers including the filing of a tariff showing that the Company is offering all the basic service requirements in Minn. Rules pt. 7812.0600, the filing of a service area map or a listing of exchanges, the filing and receiving Commission approval of an interconnection agreement and 911 plan.

The Company has committed<sup>1</sup> to comply with the regulatory requirements applicable to inmate service providers, which can be found in the Commission's July 26, 2007 Order in Docket No. P999/DI-07-204 and the regulatory requirements applicable to alternative operator service providers, which can be found in the Commission's November 19, 1991 Order in Docket No. P999/CI-88-917. These two Orders may be found at the following website addresses:

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={27CDDDB83-EC81-4449-BA2D-BD023FC029E9}&documentTitle=4737142>

[http://www.puc.state.mn.us/portal/groups/public/documents/puc\\_pdf\\_orders/002393.pdf](http://www.puc.state.mn.us/portal/groups/public/documents/puc_pdf_orders/002393.pdf)

In addition, the Company has committed to comply with the following specific requirements, as clarified by the Commission in the context of recent mergers and acquisitions involving inmate service providers<sup>2</sup>:

- Prior to the billing of any intrastate surcharges, or fees that result in a price increase to Minnesota end users, a tariff must be filed pursuant to Minnesota Rule 7812.2210 subpart 3(B), and there should be an opportunity for parties to comment.
- Any end user with whom the inmate service provider (ISP) has a billing relationship (either through a local exchange carrier or an advance pay account), must be provided with advance notice of any increase (including the implementation of surcharges or fees).
- All deposits, advance payments, fees, and all other end-user terms and conditions associated with advance pay accounts, must be tariffed pursuant to Minn. Rule 7812.2210 subpart 2B.

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<sup>1</sup> See Attachment A.

<sup>2</sup> See, for example, in the Matter of the Petition for the Transfer of Global Tel\*Link Corporation, Value Added Communications, Inc. and Control of Value-Added Communications, Inc., Docket No. P5024, 3030, 6827/PA-11-1064, *Order Approving Petition with Conditions*, December 8, 2011, and In the Matter of the Joint Petition for Transfer of Control of Securus Technologies, Inc., Docket No. P5188/PA-13-200, *Order Approving Transfer of Control*, April 14, 2013.

- To the extent that any such charges, fees, advance payments or deposits (collectively “charges”) that apply to customers are not specifically provided for by contract, the institution to whom the ISP provides service must be notified of the charges prior to any billing of such charges.

The Department recommends that the Commission:

- 1) Grant conditional approval of the request of CenturyLink Public Communications, Inc. for a certificate of authority to provide local exchange and long distance service limited to the provision of inmate calling services conditioned upon CPCI filing the tariff revision noted below.
- 2) Approve the proposed tariff as filed on November 6, 2014 and revised on January 5, 2015, conditioned upon the following tariff revision: The tariff should be revised to reflect CPCI’s customer complaint and dispute handling procedures and the availability of the Commission to assist in resolving disputes within 30 days of the Commission’s Order. CPCI has committed to do so.

Sincerely,

/s/ KATHERINE DOHERTY  
Rates Analyst

KD/ja  
Attachment

**CHECKLIST FOR PROCESSING APPLICATIONS FOR  
CERTIFICATES OF AUTHORITY FOR COMPETITIVE LOCAL EXCHANGE SERVICE  
RESTRICTED TO THE PROVISION OF INMATE CALLING SERVICE**

**Key**

X: Analyst has reviewed this item and found item to be compliant with law, or confirming information is contained in the filing.

NC: Analyst has reviewed this item and found non-compliance with law.

W: Noncompliance with Rules, but Waiver Requested. Recommendation section will state if waiver is supported by DOC.

NA: Not Applicable, or does not describe characteristic of filing or applicant.

Blank space: Spaces may be left blank if they are for inapplicable subparts to a checklist item, or if only one of several choices is to be selected.

**I. TYPE OF CERTIFICATION REQUESTED BY APPLICANT**

- X A. Facilities-based local exchange service (Note, Minn. Rules pt. 7812.0200, subpt. 2 states that a certificate to provide facilities-based local exchange service authorizes the provision of all forms of local service, interexchange service, and local niche service in Minnesota) limited to the provision of inmate calling service.
- i. Conditional certificate of authority
- X ii. Operational certificate of authority (not subject to August 25, 2000 standing Order in Docket No. P999/CI-00-634)

Note that the applicant's request for certification to provide local service is limited to the provision of inmate calling service. Pursuant to the Commission's July 26, 2007 Order in Docket No. P999/DI-07-204, the applicant is not required to file an interconnection agreement or 911 plan as long as the local service is limited to inmate services.

- B. Resale of local exchange service
- i. Conditional certificate of authority
- ii. Operational certificate of authority
- C. Long Distance Service
- i. Conditional certificate of authority
- ii. Operational certificate of authority
- D. Local Niche Service
- i. Conditional certificate of authority
- ii. Operational certificate of authority

**II. GEOGRAPHIC AREA OF CERTIFICATION**

- X A. Facilities-based local exchange company limited to the provision of inmate calling service
- a. Exchanges served by Citizens Telecommunications of Minnesota Inc.
- statewide
- other (specify exchanges) \_\_\_\_\_

- b. Exchanges served by Qwest Corporation
  - statewide
  - other (specify exchanges) \_\_\_\_\_
- c. Exchanges served by Embarq Minnesota
  - statewide
  - other (specify exchanges) \_\_\_\_\_
- d. Exchanges served by Frontier Communications of Minnesota
  - statewide
  - other (specify exchanges) \_\_\_\_\_
- e. Exchanges served by the following incumbent local exchange companies:
  - \_\_\_\_\_
  - \_\_\_\_\_
  - statewide
  - other (specify exchanges) \_\_\_\_\_
- f. Statewide, limited to the provision of inmate calling service.

- B. Resale of local exchange service
  - a. Exchanges served by Citizens Telecommunications of Minnesota Inc.
    - statewide
    - other (specify exchanges) \_\_\_\_\_
  - b. Exchanges served by Qwest Corporation
    - statewide
    - other (specify exchanges) \_\_\_\_\_
  - c. Exchanges served by Embarq Minnesota
    - statewide
    - other (specify exchanges) \_\_\_\_\_
  - d. Exchanges served by Frontier Communications of Minnesota
    - statewide
    - other (specify exchanges) \_\_\_\_\_
  - e. Exchanges served by the following incumbent local exchange companies:
    - \_\_\_\_\_
    - \_\_\_\_\_
    - statewide
    - other (specify exchanges) \_\_\_\_\_

- C. Long Distance Service
  - i. Statewide
  - ii. Other (specify)

- D. Local Niche Service
  - i. Statewide
  - ii. Other (specify)

**III. APPLICATION REQUIREMENTS OF THE APPLICANT**

Minn. Stat. §237.16, subd. 1(b) and §237.74, subd. 12 mandate that companies obtain a certificate of authority prior to offering regulated telecommunications services in Minnesota. A conditional certificate of authority is permitted under Minn. Rules pts. 7812.0300, subpt. 4 and 7812.0350, subpt. 4 when the submission and Commission approval of tariffs and interconnection agreements is a prerequisite for providing the services identified in the applicable petition for certification. The requirements for certification for providers of facilities-based local exchange service, resellers of local exchange service, long distance service, and local niche services are listed in Minn. Rules pt. 7812.0300, 7812.0350, 7812.0400, and 7812.0500 respectively.

Minn. Rules pt. 7812.0300, subpt. 2 (parts A through N) describe the application requirements and the decision criteria for granting a certificate of authority. Companies applying for certification to provide long distance, local niche, or resale of local service must meet A to L of the filing requirements, except for the information, relevant to facilities-based local exchange service providers, which is identified in Minn. Rules pt. 7812.0300, subpt. 2, items G and K.

The application requirements of Minn. Rules pt. 7812.0300, subpt. 2 (A through N) are as follows:

- A. Company has the managerial, technical and financial ability, required under Minnesota law, to provide telecommunications services in Minnesota.
- B. All applications must include the applicant's full legal name and address, including the address of the applicant's place of business; if a corporation, the names, addresses, telephone numbers, and business experience of its officers; if a partnership or limited liability partnership, the names, addresses, telephone numbers, and business experience of persons authorized to bind the partnership; or, if a limited liability company, the names, addresses, and telephone numbers of its managers;
- C. All applications must include a description of the applicant's organizational structure, including documentation identifying the petitioner's legal status, for example, sole proprietorship, partnership, limited liability partnership, company, limited liability company, corporation, and so forth; a copy of its articles of incorporation; and, a list of shareholders, partners, or members owning ten percent or more of the interest in the business;
- D. All applications must include a list of the applicant's affiliates, subsidiaries, and parent organizations, if any;
- E. All applications must include a description of the nature of the applicant's business, including a list of the services it provides. Note: Applicants that intend to provide prepaid local service must include a statement indicating that they have reviewed Minnesota Rules part 7810.1800-7810.2300 and that their proposed service complies with these Rules. Specifically, these Rules do not allow a carrier to disconnect an end user until the end user has received a disconnect notice. Disconnect notices may not be issued until after an event listed under Minnesota Rules 7810.1800 (A)-(H) has occurred.
- F. All applications must include a description of the applicant's business history, including: (1) the date the business was first organized, the dates of subsequent reorganizations, and the date the applicant started providing telephone or other telecommunications services; and (2) the applicant's experience providing telephone company services or telecommunications services in Minnesota and other jurisdictions, including the types of services provided, the dates and nature of state or federal authorization to provide those services, the length of time it has provided those services, and pending or completed criminal, civil, or administrative action taken against the applicant by a state or federal authority, including any settlements, in connection with the applicant's provision of telephone company services or telecommunications services;
- G. All applications must include a financial statement of the applicant, for the most recent fiscal year and the financial statement must consist of a balance sheet, an income statement, notes to the financial statement, and, if available, an annual report;
  - (i) Positive equity (required for facilities-based authority)
  - (ii) Company has the financial capacity necessary for the proposed undertaking

NA H. Applications for facilities-based authority must include a list and description of the types of services the applicant seeks authority to offer: (1) including the classes of customers the applicant intends to serve; (2) indicating the extent to which it intends to provide service through use of its own facilities, the purchase of unbundled network elements, or resale; (3) identifying the types of services it seeks authority to provide by reference to the general nature of the service, for example, voice, custom calling, signaling, information, data, and video; and (4) listing the technology that will be used to deliver the service, for example, fiber-optic cable, digital switches, or radio;

X I. All applications must include a proposed price list or tariff setting forth the rates, terms, and conditions of each service offering, unless the applicant is seeking a conditional certificate under subpart 4 and has not yet developed the information listed in this item;  
X (i) Tariff checklist is satisfactory

NA J. Applications for authority to provide local exchange service must include a service area map providing the information required under part 7810.0500, subpart 2, and narrative description of the area for which the applicant is seeking certification, except that if the applicant does not have the necessary agreements or tariffs to serve the entire area for which certification is sought, a map providing the information required under part 7810.0500, subpart 2, and a narrative delineating specifically those areas in which the applicant is currently prepared to provide service. A list of each of the exchanges for which the company is seeking certification will be accepted as the service area map where the entire exchange is served and each exchange is individually identified. Note also that applications for authority to provide local niche service must include a narrative description of the area for which the applicant is seeking certification;

Note that the applicant's request for certification to provide local service is limited to the provision of inmate services and, pursuant to the Commission's July 26, 2007 Order in Docket No. P999/DI-07-204, is not required to file a service area map as long as the local service is limited to inmate services.

NA K. All applications must include the date by which the applicant expects to offer local service to the entire service area for which the applicant is seeking certification, including the applicant's estimated timetable for providing at least some of its services through use of its own network facilities;

X L. Applications for facilities-based authority must include a description of the applicant's policies, personnel, and equipment or arrangements for customer service and equipment maintenance, including information demonstrating the applicant's ability to respond to customer complaints and inquiries promptly and to perform maintenance necessary to ensure compliance with the quality requirements set forth in the Commission's rules;

X M. All applications must include a copy of the applicant's certificate to conduct business from the Minnesota Secretary of State;

NA N. An application for facilities-based authority must include a description of the applicant's technology and facilities, as well as the location or proposed location of those facilities;

- i. Description of end users' connection to the network:
  - Connection to network will be made through ILEC's local loop.
  - Broadband connection will be used to access the network:
    - 1. Connecting signal will be integrated into the end user's connection with the Internet.

2. Connecting signal will be a separate connection on the same facility.

3. Connecting signal will be on a separate facility from the end user's Internet access. Explain:

Connection to network will be made through a facility other than LEC's local loop or broadband connection.

ii. Description of method to provision transport between different local calling areas:

transport provisioned via public switched network.

transport provisioned via public Internet backbone.

transport provisioned via private IP network.

transport provisioned via other method. Explain

iii. Description of location of switches or soft-switches that the applicant will use to provide the facilities based local services.

iv. Description of the availability of nomadic connection to network:

Nomadic connection available (i.e. service can be used from more than one location).

Nomadic connection not available.

v. Description of whether the facilities based local service permits a Minnesota end user to be assigned a telephone number associated with a rate center in which the end user is not physically located.

vi. Description of scope of facilities based local service offering:

Service to be offered on retail basis.

Service to be offered on wholesale basis.

vii. Description of target market for facilities based local services:

Individual residential households.

Small business customers.

Large business/large organization customers.

Other CLECs and ILECs.

0. Other information needed to demonstrate that the applicant has the managerial, technical, and financial ability to provide the services it intends to offer consistent with the requirements of this chapter and applicable law including the following:

i. All applicants must have a toll-free number required pursuant to Minn. Rules pt. 7812.0300, subpt. 3(G).

Toll free number has been called.

1. Toll-free number is operational.

2. Toll-free number is not operational. Explain:

Company states that toll free number will appear on customer bills.

ii. All applications must include a description of the extent to which the applicant has had any civil, criminal, or administrative action against it in connection with the applicant's provision of telecommunications services.

iii. All applications for authority to provide local service must be served on the Department, the OAG-RUD, the Department of Administration, persons certified to provide telecommunications service within the petitioner's designated service area, and the city clerk, or other official authorized to receive service or notice on behalf of the municipality, of all municipalities within the petitioner's designated service area in compliance with Minn. Rules pt. 7812.0200, subpt. 6.



- NA iv. Applicants requesting authority to provide local exchange service must file a 911 plan that complies with the requirements of Minn. Rules pt. 7812.0550.  
 \_\_\_ 911 checklist is satisfactory
- NA v. Applicants requesting authority to provide local exchange service must file and receive Commission approval of an Interconnection Agreement (ICA) with each Incumbent Local Exchange Carrier in the applicant's service area..  
 \_\_\_ ICA checklist is satisfactory
- NA vi. Applicants requesting authority to provide local exchange service must agree to offer the following services to all customers pursuant to Minn. Rules pt. 7812.0600 (basic service requirements):
- \_\_\_ single party voice-grade service and touch-tone capability;
  - \_\_\_ 911 or enhanced 911 access;
  - \_\_\_ 1 + intraLATA and interLATA presubscription and code-specific equal access to interexchange carriers subscribing to its switched access service;
  - \_\_\_ access to directory assistance, directory listings, and operator services;
  - \_\_\_ toll and information service-blocking capability without recurring monthly charges as provided in the Commission's ORDER REGARDING LOCAL DISCONNECTION AND TOLL BLOCKING CHARGES, Docket No. P999/CI-96-38 (June 4, 1996), and its ORDER GRANTING TIME EXTENSIONS AND CLARIFYING ONE PORTION OF PREVIOUS ORDER, Docket No. P999/CI-96-38 (September 16, 1996);
  - \_\_\_ one white pages directory per year for each local calling area, which may include more than one local calling area, except where an offer is made and explicitly refused by the customer;
  - \_\_\_ a white pages and directory assistance listing, or, upon customer request, a private listing that allows the customer to have an unlisted or unpublished telephone number;
  - \_\_\_ call-tracing capability according to chapter 7813;
  - \_\_\_ tariff language on blocking capability according to the Commission's ORDER ESTABLISHING CONDITIONS FOR THE PROVISION OF CUSTOMER LOCAL AREA SIGNALING SERVICES, Docket No. P999/CI-92-992 (June 17, 1993) and its ORDER AFTER RECONSIDERATION, Docket No. P999/CI-92-992 (December 3, 1993). Specifically, these Orders require companies offering CLASS services to offer per call business blocking to certain businesses (i.e., businesses which meet special criteria), anonymous call rejection, and per call unblocking of blocked lines without a separate charge. Businesses that meet special criteria include law firms and medical offices. Residential customers must be offered per line and per call blocking. There must be no recurring charges for blocking of caller identification services. A one-time cost-based installation fee maybe applied to customers who request line blocking after an initial period of at least 90 days; and
  - \_\_\_ Telecommunications relay service capability or access necessary to comply with state and federal regulations.
  - \_\_\_ A Separate flat rate service offering. At a minimum, each local service provider (LSP) shall offer the services identified in Minn. Rules pt. 7812.0600, subpt. 1 as a separate tariff or price list offering on a flat rate basis. An LSP may also offer basic local service on a measured rate basis or in combination with other services. An LSP may impose separate charges for the services set forth in subpart 1 only to the extent permitted by applicable laws, rules, and Commission Orders.
  - \_\_\_ Service area obligations: A LSP shall provide its local services on a nondiscriminatory basis, consistent with its certificate under part 7812.0300 or 7812.0350, to all customers who request service and

whose premises fall within the carrier's service area boundaries or, for an interim period, to all requesting customers whose premises fall within the operational areas of the local service provider's service area under part 7812.0300, subpart 4, or 7812.0350, subpart 4. The obligation to provide resale services does not extend beyond the service capability of the underlying carrier whose service is being resold. The obligation to provide facilities-based services does not require an LSP that is not an eligible telecommunications carrier (ETC) to build out its facilities to customers not abutting its facilities or to serve a customer if the local service provider cannot reasonably obtain access to the point of demarcation on the customer's premises.

\_\_\_ Service disconnection. An LSP may disconnect a customer's basic local service as allowed under parts 7810.1800 to 7810.2000, except that it shall not disconnect basic local service for nonpayment of toll or information service charges or any service other than basic local service.

\_\_\_ A competitive local exchange carrier shall offer each end user at least one flat rate calling area that matches the flat rate calling area offered that customer by the local exchange carrier under Minn. Rules pt. 7812.0900, subpt. 1, including any applicable extended area service (pursuant to Minn. Rules pt. 7812.0800, subpt. 1).

\_\_\_ Other issues (specify) \_\_\_\_\_

NA P. Applicants for local service authority must confirm that they will be collecting the Commission approved surcharge for the Telephone Assistance Plan (TAP) and will file TAP reports with the Commission verifying their remittance of this surcharge. Applicants must also list the name of the person that will be responsible for submitting these reports.

X Q. All applications must be accompanied by a \$570 filing fee.

#### IV. RECOMMENDATION OF THE DEPARTMENT

X A. Find that applicant possesses the managerial, technical, and financial abilities required under Minnesota law to provide telecommunications services.

X B. Grant a conditional certification of authority to provide the following services:

X i. Facilities-based local exchange company

\_\_\_ a. Exchanges served by Citizens Telecommunications of Minnesota Inc.

\_\_\_ statewide

\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ b. Exchanges served by Qwest Corporation

\_\_\_ statewide

\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ c. Exchanges served by Embarq Minnesota

\_\_\_ statewide

\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ d. Exchanges served by Frontier Communications of Minnesota

\_\_\_ statewide

\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ e. Exchanges served by the following incumbent local exchange companies:

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ ii. Resale of local exchange service

\_\_\_ a. Exchanges served by Citizens Telecommunications of Minnesota Inc.

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ b. Exchanges served by Qwest Corporation

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ c. Exchanges served by Embarq Minnesota

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ d. Exchanges served by Frontier Communications of Minnesota

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ e. Exchanges served by the following incumbent local exchange companies:

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ iii. Long Distance Service

\_\_\_ a. Statewide  
\_\_\_ b. Other (specify)

\_\_\_ iv. Local Niche Service

\_\_\_ a. Statewide  
\_\_\_ b. Other (specify)

\_\_\_ C. Grant an operational certification of authority to provide the following services:

\_\_\_ i. Facilities-based local exchange company

\_\_\_ a. Exchanges served by Citizens Telecommunications of Minnesota Inc.

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ b. Exchanges served by Qwest Corporation

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ c. Exchanges served by Embarq Minnesota

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ d. Exchanges served by Frontier Communications of Minnesota

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

\_\_\_ e. Exchanges served by the following incumbent local exchange companies:

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_ statewide  
\_\_\_ other (specify exchanges) \_\_\_\_\_

f. Statewide, limited to the provision of inmate calling service.

ii. Resale of local exchange service

a. Exchanges served by Citizens Telecommunications of Minnesota Inc.

statewide

other (specify exchanges) \_\_\_\_\_

b. Exchanges served by Qwest Corporation

statewide

other (specify exchanges) \_\_\_\_\_

c. Exchanges served by Embarq Minnesota

statewide

other (specify exchanges) \_\_\_\_\_

d. Exchanges served by Frontier Communications of Minnesota

statewide

other (specify exchanges) \_\_\_\_\_

e. Exchanges served by the following incumbent local exchange companies:

\_\_\_\_\_

statewide

other (specify exchanges) \_\_\_\_\_

iii. Long Distance Service

a. Statewide

b. Other (specify)

iv. Local Niche Service

a. Statewide

b. Other (specify)

D. Require the applicant to fulfill the following conditions for approval of operational certification:

1. Filing of tariffs pages listing and describing the services and applicable rates.

2. Commission approval of interconnection agreement with incumbent carrier where certificate of authority is to be operational.

3. Commission approval of 911 plan for each area where certificate of authority is to be operational.

4. Filing of certificate from Minnesota Secretary of State

5. Filing of service area map

6. Filing of narrative description of service area

7. Filing of toll-free number

8. Filing of the following information: \_\_\_\_\_

9. Filing containing the following tariff revisions: A tariff page reflecting CPCI's customer complaint and dispute handling procedures and the availability of the Commission to assist in resolving disputes

## CHECKLIST FOR PROCESSING ORIGINAL TARIFFS OR PRICE LISTS

### I. TYPE OF TARIFF OR PRICE LIST

- A. Local Exchange Tariff/Price List
- B. Access Services Tariff/Price List
- C. Long Distance Tariff/Price List
- D. Local Niche Services Tariff/Price List

### II. REGULATORY REQUIREMENTS THAT ONLY APPLY TO THE TARIFFS OR PRICE LISTS OF LOCAL EXCHANGE CARRIERS

The regulatory requirements of Minn. Rules Ch. 7810 and Minn. Rules pt. 7812.0600 are as follows:

- A. The tariffs or price lists of local exchange carriers must offer the following services to all customers pursuant to Minn. Rules pt. 7812.0600 (basic service requirements):
  - single party voice-grade service and touch-tone capability;
  - 911 or enhanced 911 access;
  - 1 + intraLATA and interLATA presubscription and code-specific equal access to interexchange carriers subscribing to its switched access service;
  - access to directory assistance, directory listings, and operator services;
  - toll and information service-blocking capability without recurring monthly charges as provided in the commission's ORDER REGARDING LOCAL DISCONNECTION AND TOLL BLOCKING CHARGES, Docket No. P999/CI-96-38 (June 4, 1996), and its ORDER GRANTING TIME EXTENSIONS AND CLARIFYING ONE PORTION OF PREVIOUS ORDER, Docket No. P999/CI-96-38 (September 16, 1996). These Orders state that no telecommunications provide may disconnect local exchange service for nonpayment of toll service. These Orders also require local exchange carriers to offer toll blocking and bill screening services with no monthly charge.;
  - one white pages directory per year for each local calling area, which may include more than one local calling area, except where an offer is made and explicitly refused by the customer;
  - a white pages and directory assistance listing, or, upon customer request, a private listing that allows the customer to have an unlisted or unpublished telephone number;
  - call-tracing capability according to chapter 7813;
    - (i) call Trace provisions in tariff mirror Commission's tariff templates.
  - blocking capability according to the Commission's ORDER ESTABLISHING CONDITIONS FOR THE PROVISION OF CUSTOMER LOCAL AREA SIGNALING SERVICES, Docket No. P999/CI-92-992 (June 17, 1993) and its ORDER AFTER RECONSIDERATION, Docket No. P999/CI-92-992 (December 3, 1993). These Orders require local exchange carriers, who

offer class services, to offer CLASS trace services and per call and residential per line blocking of CLASS services with no monthly charge. These Orders also require local exchange carriers, who offer CLASS services, to also educate their customers regarding their options with respect to CLASS services and blocking options. In addition, these Orders require companies offering CLASS services to offer per call business blocking to certain businesses (i.e., businesses which meet special criteria) without a monthly charge and anonymous call rejection without a separate charge. Businesses that meet special criteria include law firms and medical offices. Residential customers must be offered per line and per call blocking. A one-time cost-based installation fee maybe applied to customers who request line blocking after an initial period of at least 90 days; and

NA telecommunications relay service capability or access necessary to comply with state and federal regulations.

NA B. A Separate flat rate service offering is required pursuant to Minn. Rules pt. 7812.0600, subpt. 2. At a minimum, each local service provider (LSP) shall offer the services identified in Minn. Rules pt. 7812.0600, subpt. 1 as a separate tariff or price list offering on a flat rate basis. An LSP may also offer basic local service on a measured rate basis or in combination with other services. An LSP may impose separate charges for the services set forth in subpart 1 only to the extent permitted by applicable laws, rules, and commission orders.

X C. Service area obligations under Minn. Rules pt. 7812.0600, subpt. 3: An LSP shall provide its local services on a nondiscriminatory basis, consistent with its certificate under part 7812.0300 or 7812.0350, to all customers who request service and whose premises fall within the carrier's service area boundaries or, for an interim period, to all requesting customers whose premises fall within the operational areas of the local service provider's service area under part 7812.0300, subpart 4, or 7812.0350, subpart 4. The obligation to provide resale services does not extend beyond the service capability of the underlying carrier whose service is being resold. The obligation to provide facilities-based services does not require an LSP that is not an eligible telecommunications carrier (ETC) to build out its facilities to customers not abutting its facilities or to serve a customer if the local service provider cannot reasonably obtain access to the point of demarcation on the customer's premises.

X D. Service disconnection requirements under Minn. Rules pt. 7812.0600, subpt. 7: An LSP may disconnect a customer's basic local service as allowed under parts 7810.1800 to 7810.2000, except that it shall not disconnect basic local service for nonpayment of toll or information service charges or any service other than basic local service.

NA E. A competitive local exchange carrier shall offer each end user at least one flat rate calling area that matches the flat rate calling area offered that customer by the local exchange carrier under Minn. Rules pt. 7812.0900, subpt. 1, including any applicable extended area service (pursuant to Minn. Rules pt. 7812.0800, subpt. 1).

NA F. Local exchange companies must comply with the requirements of Minn. Stat. § 237.73 before disconnecting local exchange services in cases of fraud. Minn. Stat. § 237.73 generally requires a local exchange carrier to obtain a temporary restraining order or injunction before disconnecting local exchange services in cases of fraud.

- X   G. Local exchange carriers who propose to include provisions in their tariffs or price lists allowing for individual case based (ICB) pricing of local exchange services must comply with the Commission’s applicable policies and Orders.
  
- NA   H. Local exchange carriers that are Eligible Telecommunications Carriers (ETCs) must offer the Link-up Program.
  - (i) Link-up provisions in tariff mirror Commission’s tariff templates.
  - (ii) Carrier is not an ETC and is not required to offer Link-Up.
  
- X   I. All local exchange carriers who introduce promotions must file the appropriate notices with their promotions pursuant to the requirements of Minn. Stat. § 237.626. Minn. Stat. § 237.626 states that “The notice must identify customers to whom the promotion is available and include cost information demonstrating that the revenue from the service covers incremental cost, including cost of the promotion.” The notice must include information showing the number of units projected to be sold during the promotion and the projected revenue to be derived during the promotion less the cost of the promotion (including the cost of the charge that is being waived and the administrative cost of carrying out the promotion) to derive the net value of the promotion.
  
- NA   J. Local exchange carriers may not withhold number portability from customers whose accounts are in arrears. Docket Nos. P5692, 421/M-99-196; P5669,430/M-99-701.
  
- NA   K. Local service providers must offer the Telephone Assistance Plan (TAP).
  - (i) TAP provisions in tariff mirror Commission’s tariff templates.
  
- NA   L. Local exchange carriers that file tariffs imposing termination charges on wireless carriers must abide by the Commission’s Orders in Docket No. P511/M-03-811.
  
- NA   M. Local exchange carriers who provide directory assistance service to their customers for a fee must provide immediate credit to a customer who informs them that they have been provided incorrect information for which a DA rate has been charged. A local exchange carrier must notify its customers of the right to the immediate credit for incorrect directory assistance. The notice must be in a writing labeled "NOTICE OF RIGHT TO INCORRECT DIRECTORY ASSISTANCE CREDIT." The notice must be given to a new customer within 45 days of commencing service and at least annually thereafter. The notification print must be of sufficient size to be clearly legible. See Minn. Stat. §237.155.

**III. REGULATORY REQUIREMENTS THAT APPLY ONLY TO THE TARIFFS OR PRICE LISTS OF LONG DISTANCE CARRIERS**

The regulatory requirements of Minn. Rules Ch. 7810, Minnesota law, and applicable Commission Orders are as follows:

- X   A. Minn. Stat. § 237.74, subd. 2 prohibits discrimination with respect to long distance services and states as follows: “No telecommunications carrier shall offer telecommunications service within the state upon terms or rates that are unreasonably discriminatory. No telecommunications carrier shall unreasonably limit its service offerings to particular geographic areas unless facilities necessary for the service are not available and cannot be made available at

reasonable costs. The rates of a telecommunications carrier must be the same in all geographic locations of the state unless for good cause the commission approves different rates. A company that offers long-distance services shall charge uniform rates and charges on all long-distance routes and in all geographic areas in the state where it offers the services. However, a carrier may offer or provide volume or term discounts or may offer or provide unique pricing to certain customers or to certain geographic locations for special promotions, and may pass through any state, municipal, or local taxes in the specific geographic areas from which the taxes originate.”

X  B. Federal law prohibits IXCs from deaveraging interstate rates based on differing access charges and preempts inconsistent state law on intrastate rates that might otherwise permit such deaveraging.<sup>3</sup>

X  C. With respect to those carriers who bill for uncompleted calls, the Commission’s October 16, 1987 Notice to All Long Distance Carriers requires carriers to notify their customers regarding policies relating to billing for uncompleted telephone calls and the policies regarding the availability and procedures for providing refunds of those billed amounts.

#### IV. REGULATORY REQUIREMENTS THAT APPLY TO THE TARIFFS OR PRICE LISTS OF ALL TELECOMMUNICATIONS CARRIERS

The regulatory requirements of Minn. Rules Ch. 7810, Minnesota law, and applicable Commission Orders are as follows:

NA  A. The disconnection requirements in Minn. Rules pt. 7810.1800 through 7810.2200 apply to all telephone companies. Minn. Rules pt. 7810.1800 specifies the permissible reasons to disconnect service with notice. Minn. Rules pt. 7810.1900 specifies permissible reasons to disconnect service without notice. Minn. Rules pt. 7810.2000 specifies nonpermissible reasons to disconnect service. Minn. Rules pt. 7810.2100 requires that service shall not be disconnected on any Friday, Saturday, Sunday, or legal holiday, or any time when the utility’s business offices are not open to the public, except where an emergency exists. Minn. Rules pt. 7810.2200 states that a utility shall not charge a reconnect fee for disconnection of service without notice pursuant to Minn. Rules pt. 7810.1900 (B).

\_\_\_ (i) Disconnection provisions in tariff mirror Commission’s tariff templates.

X  B. Notices sent out pursuant to Minn. Rules Ch. 7810 must comply with the notice requirements of Minn. Rules pt. 7810.2300. The notice requirements under Minn. Rules pt. 7810.2300 require, among other things, that notice must precede the action to be taken, such as disconnection, by at least five days excluding Sundays and legal holidays.

X  C. All telephone companies operating in Minnesota must comply with the Commission’s deposit and guarantee requirements in Minn. Rules pt. 7810.1500 through 7810.1700. Minn. Rules pt. 7810.1500 states that deposits can only be based on a customer’s utility credit rating. Minn. Rules pt. 7810.1600 requires that deposits be refunded after 12 months of prompt

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<sup>3</sup> Policy and Rules Concerning the Interstate, Interexchange Marketplace, “Report and Order,” 1996 WL 444636, 11 F.C.C.R. 9564, 11 FCC Rcd. 9564 (Aug. 07, 1996) (No. CC 96-61, FCC 96-331) at ¶¶38, 46.



payment of bills to a given telephone company. Minnesota Statutes §325E.02 requires interest to be paid on deposits over \$20 at the rate set by the Commissioner of the Department of Commerce, and posted on the Department's website at [www.commerce.state.mn.us](http://www.commerce.state.mn.us). Minn. Rules pt. 7810.1700 covers guarantee of payment.

(i) Deposit provisions in tariff mirror Commission's tariff templates.

(ii) No deposit required.

- D. All telephone companies who apply a returned check charge must comply with the requirements of Minn. Stat. § 604.113. Minn. Stat. § 604.113 states that "a service charge of up to \$30, may be imposed immediately on any dishonored check by the payee or holder of the check, regardless of mailing a notice of dishonor, if notice of the service charge was conspicuously displayed on the premises when the check was issued. Only one service charge may be imposed under this paragraph for each dishonored check. The displayed notice must also include a provision notifying the issuer of the check that civil penalties may be imposed for nonpayment." To satisfy this requirement, local service providers must list the returned check charge in their annual notice of customer rights required under Minn. Rules 7812.1000 and in their tariffs. Long distance providers must list the charge in their tariffs.
- E. Telephone companies are not allowed to disconnect service in cases of insolvency or bankruptcy that are unrelated to the payment of services to a given telephone company. Minn. Rules. pt. 7810.1500 states that "no utility shall use any credit reports other than those reflecting the purchase of utility services to determine the adequacy of a customer's credit history without the permission in writing of the customer." Minn. Rules pt. 7810.1800 does not allow for disconnection of services in general cases of bankruptcy and insolvency which are unrelated to the use of the utility's services.
- F. The Commission requires telephone companies who require advance payments from some, but not all, subscribers of a given service to comply with the Commission's deposit rules with respect to these advance payments. This requirement was established pursuant to the Commission's Order of April 1, 1993 for Docket No. P999/CI-92-868.
- G. Telecommunications carriers may not include "forum selection" clauses in their tariffs or contracts which requires customers to litigate in an out-of-state forum. Docket No. P5358, 5381/C-97-1197, Order issued December 29, 1997.
- H. Telecommunications carriers may not include mandatory arbitration provisions in their tariffs. Customers must have the option of filing complaints with the Commission or filing a claim in court in lieu of arbitration. Docket No. P3073/TC-97-1326, Order Issued February 25, 1998.
- I. All telephone companies must comply with the Commission's dial service requirements. Minn. Rules pt. 7810.5300 requires complete dialing of called numbers on at least 97 percent of telephone calls.
- J. All telephone companies operating in Minnesota are required, under the tariff filing requirements of Minn. Stat. § 237.07 and § 237.74, subd. 1 to submit tariff or price list filings for individual promotions. Although telephone companies may include general language in their tariffs or price lists indicating that they offer promotions, the companies should be aware that individual tariff or price list

filings must be filed and the filings must describe the individual promotions in detail.

\_\_\_\_ K. All telephone and telecommunications carriers should include, in their tariffs, the Commission's template on "Customer Complaints and/or Billing Disputes." Inclusion of this template in the tariff is an informal requirement of the Commission's staff. Failure to include the template in the tariff may result in a processing delay. CPCI has committed to file a revised tariff page reflecting its customer complaint and dispute handling procedures and the availability of the Commission to assist in resolving disputes.

\_\_\_\_ L. Other issues (specify) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**V. RECOMMENDATION OF THE DEPARTMENT**

\_\_\_\_ A. Approve the proposed tariff/price list as filed by the Company.

\_\_\_\_ B. Approve the proposed tariff/price list as filed by the Company and revised on the following date(s):

X  C. Approve the proposed tariff/price list contingent upon the Company filing the following tariff revisions within 30 days of the date of issuance of the Order in this case:

A tariff page reflecting CPCI's customer complaint and dispute handling procedures and the availability of the Commission to assist in resolving disputes

/ja

# **ATTACHMENT A**

**CenturyLink Public Communications' Responses to the  
Department of Commerce's Information Requests  
Docket No. P-6939/NA-14-959**

1. In its *Order Affirming and Modifying the Regulatory Treatment of Inmate Telephone Service Providers* in Docket No. P999/DI-07-204 (attached), the Minnesota Public Utilities Commission determined that inmate service provider filings should be as closely matched as feasible to competitive local exchange carrier (CLEC) filings required pursuant to Minn. Rules Parts 7811 and 7812, with certain exceptions (for example, inmate service providers are not required to submit 911 plans).

The Commission determined that inmate service providers (ISPs) should be subject to certification as competitive local exchange providers (CLECs). CenturyLink Public Communications Inc.'s (CPCI) application states that it seeks certification as an interexchange service provider. Does CPCI wish to seek certification as a CLEC in order to provide inmate calling services in Minnesota? If yes, please provide a revised application page 1 that reflects the type of certification that CPCI seeks.

**Response:**

CPCI has filed a revised application page 1 that states that CPCI seeks certification as a facilities based provider in order to provide inmate calling services in Minnesota.

2. The Commission has also required that all rates and conditions of inmate services, including all deposits, advance payments, fees, and all other end-user terms and conditions associated with advance pay accounts, be tariffed pursuant to Minn. Rule 7812.2210 subpart 2B.
  - a. Please list any surcharges, fees, or other rates applicable to inmates, or to families and friends of inmates who accept calls from inmates, that are not specifically provided for in CPCI's proposed tariff. Include deposits, line-item monthly fees, per call surcharges, account set-up fees, credit card fees, check payment fees, fees for account statements, surcharges or fees applicable to inmate debit accounts and any other fees that apply to end user customers or customers who accept calls from institutions.
  - b. Please provide revisions to CPCI's proposed tariff to incorporate any charges listed in response to part (a), or provide an explanation of why these charges should not be included in the tariff.

**Response:**

All surcharges, fees, or other rates applicable to inmates, or to families and friends of inmates who accept calls from inmates, are included in CPCI's proposed tariff.

3. How do customers who do not receive an itemized monthly bill (i.e. customers with prepaid collect service accounts or inmate debit accounts obtain a listing of calls and the actual charges for each call? If there is a charge associated with obtaining a listing of calls, please provide the charge amount.

**Response:**

Families and friends of inmates who have a prepaid account set up may access statements online to obtain a listing of calls and charges. Inmates who use a debit account can request a statement from facility staff or from site administrators. CenturyLink also works with its facility customers to, with their approval, provide posters next to phones, leaflets at visitation, and customized websites linked from DOC's websites that list rates, fees, and calling policies – see for example <http://www.centurylink.com/corrections/adoc/index.html>.

4. Section 2.8. "Contractual Offerings" on page 9 of CPCI's proposed tariff states that "*The Company may negotiate with prospective customers for the provision of any competitive telecommunications service and may offer or agree to provide such service on such terms and for such rates and charges as it deems reasonable, without regard to this tariff. The Company shall file with the Commission, upon request, any contract or memorandum of understanding which will include the rates, charges, practices rules or regulations applicable to the service.*"

Please revise this section to reflect that any rates and charges applicable to end users, whether arrived at through contract negotiation with a facility or not, will be tariffed. For example:

*The Company may negotiate with prospective facilities for the provision of any competitive telecommunications service. Any such negotiated terms, rates, or charges applicable to end-users shall be filed with the Commission. The Company shall also file with the Commission, upon request, any contract or memorandum of understanding which includes rates, charges, practices, rules or regulations applicable to the service provided to end users."*

**Response:**

CPCI has revised its proposed tariff to include the language given above. Attached as Attachment A is the revised proposed tariff. CPCI will file a final tariff upon receipt of a Commission order granting CPCI operational authority.

5. How will inmates be notified of rate increases (including the implementation of new or increased surcharges and/or line item fees) or significant changes in terms or conditions?

**Response:**

CPCI notifies inmates of rate changes by posting notices within the facility and also by recording a "message of the day" that is heard by inmates each time they use the telephone system for designated periods prior to as well as after any rate change. Rate changes are typically only made in response to a regulatory change.

6. How will customers that accept calls from inmates be notified of rate increases (including the implementation of new or increased surcharges and/or line item fees) or significant changes in terms or conditions?

**Response:**

Because inmates are initiating the calls to family members and friends, they provide the first level of communication to called parties regarding rate changes. In addition, all called parties are given the opportunity for a rate quote during the call set up process. Neither the inmate nor the called party is billed for the time used during an announcement or rate quote.

7. Please explain how CPCI will inform any institution or facility to which it provides inmate calling service of any changes to tariffed and untariffed surcharges, fees, or other rates, including changes to charges that are not specifically identified in a contract.

**Response:**

All surcharges, fees, and rates are specifically identified in each contract with a correctional facility. Any changes in these surcharges, fees, and rates are negotiated with the institution or facility subject to applicable regulation, and then memorialized in a contract amendment that is provided to the institution or facility.

8. CPCI states that it “obtains contracts through the bid process initiated by correctional institutions or their governing agencies.”
- a. Are the rates CPCI has included in its tariff (Section 4) (including the Miscellaneous Charges set forth in Section 4.2) the actual rates that CPCI will charge end users, or are such rates subject to contract negotiation with correctional institutions or their governing agencies?
  - b. If the rates set forth in Section 4 of the proposed tariff rates are not the actual rates that end users will be charged, or if the rates will be changed based on negotiations with institutions to which CPCI intends to provide service, please replace the rates with TBD (to-be-determined).
  - c. CPCI must update its tariff with the actual rates prior to implementing the rates.

**Response:**

- a. The rates CPCI has included in its tariff were “not to exceed” amounts; rates lower than these may be sought and implemented by correctional institutions..
  - b. CPCI has revised its tariff to indicate that rates are TBD.
  - c. Actual rates will be included in an updated tariff once a contract has been reached with a correctional facility.
9. Please describe the applicability of each surcharge and line item fee on page 15 of CPCI’s proposed Minnesota tariff. Are these fees disclosed to facilities at the time of contract negotiation? Are the fees documented in contracts?

**Response:**

The Voice Biometric Fee may be charged on each call when the institution chooses to implement voice biometric technology. This fee is a pass through charge that is remitted to a third party in return for the technology. The Bill Statement Fee for Collect Accounts is a monthly charge that may appear on the phone bill of a friend or family member who has accepted at least one traditional collect call from an inmate during the bill cycle month. The Transactions Fees for Prepaid Accounts may be charged when a friend or family member prepays for future phone calls. These fees are only charged once during each transaction and may vary based on the method of purchase.

All CenturyLink-proposed fees are disclosed to the institution prior to contract signing and help offset the costs associated with providing an online option and live telephone operators to assist with funding an account. A refund fee may also be charged to cover the cost of processing a refund back to a friend or family member.

All surcharges, rates, and fees, including those indicated on page 15 of the proposed tariff, are documented in the contract between CPCI and an inmate institution. All charges for inmates and their friends and family are negotiated with the facility during contract negotiation.

10. Will CPCI provide any non-institutional intrastate telecommunications service in Minnesota? If yes, please describe.

**Response:**

CPCI currently has 12 coin operated payphones in the state of Minnesota. CPCI was granted a Certificate of Authority to Provide Customer-Owned Pay Telephone Service on January 30, 1998 when the company was operating under the name Sprint Payphone Services, Inc. While CPCI does provide this non-institutional intrastate telecommunications service in Minnesota, this application is only for institutional intrastate telecommunications service.

11. Please confirm that CPCI will comply with each of the following requirements:

- a. Prior to billing any intrastate surcharges or fees that result in a price increase to Minnesota end users, a tariff must be filed pursuant to Minnesota Rule 7812.2210 subpart 3(B).
- b. To the extent that any such charges, fees, advance payments or deposits (collectively "charges") that apply to customers are not specifically provided for by contract, the institution to whom the inmate service provider provides service must be notified of the charges prior to any billing of such charges.
- c. End users with whom the inmate service provider has a billing relationship (either through a local exchange carrier or an advance pay account), must be provided with advance notice of any increase (including the implementation of surcharges or fees).



- d. Prior to the called party agreeing to accept a call, the inmate service provider must provide upon request, all rate information, including all recurring and non-recurring charges that will be assessed for the call, to the end user, prior to the end user accepting the call.
- e. Inmate telephone service providers must bill the end user within 90 days
- f. An inmate service provider must file a sample bill if requested by the Commission or Department.
- g. An inmate service provider must not bill for unanswered calls.
- h. An inmate service provider must agree to comply with the FCC's regulatory requirements applicable to inmate service providers.

**Response:**

CPCI will comply with each of the requirements listed above.

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Checklist - Comments**

**Docket No. P6939/NA-14-959**

Dated this 15<sup>th</sup> day of January 2015

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_14-959_NA-14-959
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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_14-959_NA-14-959
JoAnn	Hanson	joann.hanson@centurylink.com	CenturyLink	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-959_NA-14-959
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_14-959_NA-14-959
Jennifer	Roubique	Jennifer.Roubique@CenturyLink.com	CenturyLink Public Communications, Inc. dba CenturyLink	100 CenturyLink Dr  Monroe, LA 71203	Electronic Service	No	OFF_SL_14-959_NA-14-959
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-959_NA-14-959
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_14-959_NA-14-959
Daniel	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551022147	Electronic Service	No	OFF_SL_14-959_NA-14-959