

January 22, 2015

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

RE: Petition of Sage Telecom Communications, LLC (Sage) for Designation as an Eligible  
Telecommunications Carrier (Low Income Only) in Minnesota  
Docket No. P6920/M-13-1176

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce in the above referenced matter.

The petition was filed on December 30, 2013 by:

Tony S. Lee, Esq. and  
Paul J. Feldman, Esq.  
Fletcher, Heald & Hildreth, PLC  
1300 N. 17th Street, 11th Floor  
Arlington, VA 22209

On January 16, 2014, Sage filed a notice of substitution in counsel, and requested that copies of all pleadings, filings, correspondence, and notices regarding Sage' petition be provided to:

Lance J.M. Steinhart, Esq.  
Kasey Chow, Esq.  
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Attorneys at Law  
1725 Windward Concourse, Ste. 150  
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The Department recommends approval of the petition with conditions, and is available to answer any questions the Commission may have.

Sincerely,

/s/ KATHERINE DOHERTY  
Rates Analyst

KD/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. P6920/M-13-1176

**I. PROCEDURAL BACKGROUND**

On December 30, 2013, Sage Telecom Communications, LLC (Sage) filed a petition seeking designation as an Eligible Telecommunications Carrier (ETC) in Minnesota for the purpose of receiving federal universal service support solely for providing Lifeline (and Linkup) service to qualified customers.

**II. APPLICABLE LAW**

FCC Rule 47 C.F.R. § 54.101 (a) defines the supported services that must be offered by eligible telecommunications carriers, and states:

(a) *Services designated for support.* Voice Telephony services shall be supported by federal universal service support mechanisms. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services<sup>1</sup> to qualifying low-income consumers as provided in subpart E of this part.

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<sup>1</sup> The FCC clarified in its February 6, 2012 Report and Order and Further Notice of Proposed Rulemaking in the Matter of Lifeline and Linkup Reform and Modernization (WC Docket No. 11-42), Lifeline and Linkup (WC Docket 03-109) Federal State Joint Board on Universal Service (CC Docket No. 96-45) and Advancing Broadband through Digital Literacy Training (WC Docket No. 12-23) (*Lifeline Linkup Reform Order*) that it would require (or support) toll limitation service for plans offered by ETCs that do not charge a fee for toll calls in addition to the per month or per billing cycle price of the consumer's Lifeline service (para. 230).

FCC Rule 47 C.F.R. § 54.201 (d) requires that a common carrier designated as an eligible telecommunications carrier under this section shall be eligible to receive universal service support in accordance with section 254 of the Act and shall, throughout the service area for which the designation is received:

- (1) Offer the services that are supported by federal universal service support mechanisms under subpart B of this part and section 254(c) of the Act, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier);<sup>2</sup> and
- (2) Advertise the availability of such services and the charges therefore using media of general distribution.

FCC Rule 47 C.F.R. §54.202 sets forth requirements for designation of eligible telecommunications carriers, and states:

- a) In order to be designated an eligible telecommunications carrier under section 214(e) (6), any common carrier in its application must:
  - 1) (i) Certify that it will comply with the service requirements applicable to the support that it receives.
  - (ii) Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. Each applicant shall estimate the area and population that will be served as a result of the improvements. ***Except, a common carrier seeking designation as an eligible telecommunications carrier in order to provide supported services only under subpart E of this part does not need to submit such a five-year plan*** (emphasis added).
- (2) Demonstrate its ability to remain functional in emergency situations, including a demonstration that it

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<sup>2</sup> The FCC granted, on its own motion, blanket forbearance from applying the facilities requirement of section 214(e)(1)(A) of the Act to *all* telecommunications carriers that seek designation limited to participation in the Lifeline program, subject to the following conditions:

- Each carrier must (a) provide its Lifeline subscribers with 911 and E911 access, regardless of activation status and the availability of minutes, (b) provide its Lifeline subscribers with E911 compliant handsets and replace, at no charge, non-compliant handsets of Lifeline-eligible subscribers.
- Each carrier must submit and receive FCC approval of a compliance plan providing "specific information about the carrier's service offerings and outlining the measures the carrier will take to implement the obligations contained in [the Lifeline Linkup Reform Order] as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary."

has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

- (3) Demonstrate that it will satisfy applicable consumer protection and service quality standards. A commitment by wireless applicants to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service will satisfy this requirement. Other commitments will be considered on a case-by-case basis.
- (4) For common carriers seeking designation as an eligible telecommunications carrier for purposes of receiving support only under subpart E of this part, demonstrate that it is financially and technically capable of providing the Lifeline service in compliance with subpart E of this part.
- (5) For common carriers seeking designation as an eligible telecommunications carrier for purposes of receiving support only under subpart E of this part, submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the eligible telecommunications carrier offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.
  - b) Public interest standard. Prior to designating an eligible telecommunications carrier pursuant to section 214(e) (6), the Commission determines that such designation is in the public interest.

47 C.F.R. §54.405 subparts (a) and (b) require that ETCs a) must make Lifeline service available to low income consumers and b) must publicize the availability of Lifeline service “in a manner reasonably designed to reach those most likely to qualify for the service. Subpart (c) requires specific disclosures in marketing materials.”

47 C.F.R. §54.410 (a) as amended June 25, 2013, states that:

All eligible telecommunications carriers must implement policies and procedures for ensuring that their Lifeline subscribers are eligible to receive Lifeline services. An eligible telecommunications carrier may not provide a consumer with an activated device that it represents enables use of Lifeline-supported service, nor may it activate service that it represents to be Lifeline service, unless and until it has (1) confirmed that the consumer is a qualifying low-income consumer pursuant to §54.409, and (2) completed the eligibility determination and certification required by this section and §§ 54.404-54.405, and completed any other necessary enrollment steps.

47 C.F.R §54.417(a) imposes record keeping requirements on ETCs, stating:

- (a) Eligible telecommunications carriers must maintain records to document compliance with all Commission and state requirements governing the Lifeline and Tribal Link Up program for the three full preceding calendar years and provide that documentation to the Commission or Administrator upon request. Notwithstanding the preceding sentence, eligible telecommunications carriers must maintain the documentation required in §54.410(d) and (f) for as long as the subscriber receives Lifeline service from that eligible telecommunications carrier.

47 C.F.R §54.420 (a) provides for audits, every two years, of overall compliance with rules and the company’s internal controls for Companies that receive \$5 million or more annually on a holding company basis every two years.

47 C.F.R §54.422(a) sets forth the requirements for annual certifications required of all carriers (including Lifeline-only ETCs) that provide Lifeline service and receive low-income support, and states:

- (a) In order to receive support under this subpart, an eligible telecommunications carrier must annually report:
  - (1) The company name, names of the company's holding company, operating companies and affiliates, and any branding (a “dba,” or “doing-business-as company” or brand designation) as well as relevant universal service

identifiers for each such entity by Study Area Code. For purposes of this paragraph, “affiliates” has the meaning set forth in section 3(2) of the Communications Act of 1934, as amended; and

- (2) Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the eligible telecommunications carrier offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.

47 C.F.R. §54.422(b)<sup>3</sup> sets forth additional annual certifications required of eligible telecommunications carriers that receive Lifeline *only* support.

- (b) In order to receive support under this subpart, a common carrier that is designated as an eligible telecommunications carrier under section 214(e) (6) of the Act and does not receive support under subpart D of this part must annually provide:
- (1) Detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which the eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect
    - (i) At least ten percent of the end users served in a designated service area; or
    - (ii) A 911 special facility, as defined in 47 CFR 4.5(e).
    - (iii) Specifically, the eligible telecommunications carrier’s annual report must include information detailing:
      - (A) The date and time of onset of the outage;
      - (B) A brief description of the outage and its resolution;
      - (C) The particular services affected;
      - (D) The geographic areas affected by the outage;
      - (E) Steps taken to prevent a similar situation in the future; and
      - (F) The number of customers affected.
  - (2) The number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year;
  - (3) Certification of compliance with applicable service quality standards and consumer protection rules;
  - (4) Certification that the carrier is able to function in emergency situations as set forth in §54.202(a) (2).

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<sup>3</sup> Similar annual reporting requirements for ETCs that receive high cost support are set forth in 47 C.F.R. §54.313.

47 C.F.R. §54.422(c) requires that:

All reports required by this section must be filed with the Office of the Secretary of the Commission, and with the Administrator. Such reports must also be filed with the relevant state commissions and the relevant authority in a U.S. territory or Tribal governments, as appropriate.

### III. STATEMENT OF ISSUES

- Whether Sage has demonstrated the intent and capability of offering and advertising voice telephony service to Lifeline-qualified customers throughout its requested service area.
- Whether designation of Sage as an ETC, limited to the provision of Lifeline service, is in the public interest.

### IV. ANALYSIS

Under Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules, a common carrier may be designated as an ETC if it (1) offers the services supported by federal universal service, (2) offers such services using its own facilities or a combination of its own facilities and resale of another carrier's services; and (3) advertises the availability of such services and the relevant charges using media of general distribution. FCC Rule 47 C.F.R. §54.202 sets forth specific requirements that an applicant must fulfill in order to be designated as eligible telecommunications carriers.

#### ***Sage is a Common Carrier***

Sage, as a Commercial Mobile Radio Service (CMRS) provider, is a common carrier as defined in 47 U.S.C. §153 (11).<sup>4</sup>

#### ***Sage Will Offer "Voice Telephony" Services***

Sage states that it will provide its customers with voice grade access to the public switched network, permitting its customers to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal that there is an incoming call, minutes of use for local service at

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<sup>4</sup> 47 U.S.C. § 153 (11) states: The term "common carrier" or "carrier" means any person engaged as a common carrier for hire in interstate or foreign communications by wire or radio or interstate or foreign radio transmission of energy, except where reference is made to common carriers not subject to this chapter; but a person engaged in radio broadcasting shall not be deemed a common carrier.

no additional charge, and access to emergency services,<sup>5</sup> as required by 47 C.F.R. 54.101 (a).

**Sage's Facilities**

Sage states that it will provide voice telephony through resale of Verizon Wireless (Verizon) and Sprint mobile services.<sup>6</sup> Sage does not meet the "own facilities" requirement, but received approval from the FCC of its Revised Compliance Plan (Compliance Plan) on December 26, 2012, enabling it to take advantage of the FCC's blanket grant of forbearance from the facilities based requirement. Sage filed a copy of the approved Compliance Plan in Exhibit 1 attached to its initial petition filed December 30, 2013.

**Sage's Requested Service Area**

Sage states that it seeks certification in the geographic areas in Minnesota where its underlying carriers, Sprint Spectrum (Sprint) and Verizon Wireless, provide coverage, and has provided a list of Minnesota exchanges throughout which it will provide service.<sup>7</sup>

**Sage's Intent to Advertise the Supported Services throughout its Requested Service Area**

As an ETC for the sole purpose of providing Lifeline service to low income customers, it is to Sage's benefit to advertise its offerings and engage in outreach efforts that will result in increased participation in the Lifeline program.

Sage notes in its initial petition that it will "advertise the availability of its services and charges in a manner designed to reach those likely to reach Lifeline-eligible consumers and the general public within Minnesota."<sup>8</sup> Sage states that it intends to advertise through a combination of media channels, such as print advertisements, direct marketing, and the Internet. Sage states that, as required, its marketing materials "will state, in easily understood language, that (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) Sage is the provider of the service."<sup>9</sup> In response to the Department's request for additional information, Sage stated that:

Sage has yet to identify the specific means by which it will advertise in Minnesota...Sage expects that such advertisements will occur at least monthly. Furthermore, the Company will ensure annual distribution of outreach material to locations where such advertisements are expected to reach those

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<sup>5</sup> Sage Initial Petition, pages 6-7.

<sup>6</sup> *Id.*, page 8.

<sup>7</sup> Sage response to Department IR#15 (DOC - Att. A).

<sup>8</sup> Sage Initial Petition, page 13.

<sup>9</sup> *Id.*



consumers that are likely to qualify for Lifeline service, i.e. the Salvation Army, Department of Health and Human Services, public libraries, and Community Councils.<sup>10</sup>

The Department recommends that the Commission incorporate a condition in its order requiring, as it has for other ETC applicants, that Sage provide a formal advertising plan, listing the specific media and means through which it intends to advertise the availability of Lifeline service and a proposed schedule or anticipated frequency of such advertising within 30 days of the Commission order approving Sage's petition.

### **Sage's Willingness to Comply with the Applicable Service Requirements**

Sage certifies that it will comply with the service requirements applicable to the low-income support it receives (as required by 47 C.F.R. 54.202(a) (1)) as a result of designation as ETC for purposes of receiving Lifeline. Sage describes, in its FCC Compliance Plan, how it will comply with the FCC's new requirements, rules, and policies applicable to the provision of Lifeline service. Sage will be bound by the service requirements codified in FCC Rules 54.405, 54.410,<sup>11</sup> 54.416, 54.417, and 54.422.

### **Sage's Ability to Remain Functional in Emergency Situations**

Sage states in its initial petition that it has "detailed Emergency Action and Disaster Recovery Plans in place to respond to emergencies."<sup>12</sup> Sage service will be provided through resale, of Sprint Spectrum and Verizon Wireless, and its agreements with its underlying carriers provide for the continuation of services and set forth obligations for the service to remain functioning during emergency situations. In response to the Department's request to provide additional detail, Sage has provided a copy of its emergency operations plan applicable to its Minnesota service area.<sup>13</sup> Further, both Sprint and Verizon have provided certification in other dockets before the Commission that they have reasonable amounts of back-up power to ensure functionality without an external power source, the ability to reroute traffic around the damaged facilities and the ability to manage traffic spikes resulting from emergency situations.

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<sup>10</sup> Sage response to Department IR #1. (DOC – Att. A.)

<sup>11</sup> The Department notes that on June 25, 2013, the FCC issued an Order underscoring "certain compliance requirements that are contained in the Lifeline Reform Order and its accompanying rules." Noting that "despite the directives provided in the Lifeline Reform order, some ETCs may be activating phones that they represent enable use of Lifeline-supported service for consumers prior to fully verifying the eligibility of such consumers," the FCC amended section 54.410(a) of the FCC's rules to reflect that an ETC may not provide Lifeline service, ***even on an interim basis*** while the consumer's application is being processed, before verifying eligibility. The FCC also took the opportunity to reiterate, in its order, that Lifeline is a "non-transferable retail service offering, a fact that must be disclosed to the consumer and included on the certification form." (In the Matter of Lifeline and Link Up Modernization and Reform, WC Docket No. 11-42, June 25, 2013).

<sup>12</sup> Sage Initial Petition, page 12.

<sup>13</sup> Sage Response to Department IR #16.

The Department believes sufficient information has been provided for the Commission to conclude that Sage has the capability of remaining functional in a variety of emergency situations.

**Service quality, Consumer Protection, and Customer Service Commitments**

Sage states on page 12 of its petition that it commits to comply with the Cellular Telecommunications and Internet Association (CTIA) Consumer Code, which the FCC has found to be an adequate commitment to consumer protection and service quality standards. The stated purpose of the CTIA code is “to provide consumers with information to help them make informed choices when selecting wireless service,” and includes, among other requirements and voluntary commitments:

- Provisions related to disclosure of all rates, terms and conditions to consumers at the point of sale and on the carriers’ websites.
- A commitment to make coverage maps available to consumers at the point of sale and on their websites.
- A commitment to provide specific disclosures in advertising.
- A commitment to provide ready access to customer service, specifically:  
Customers will be provided a toll-free telephone number to access a carrier’s customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Each wireless carrier will provide information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information will be included, at a minimum, on all billing statements, in written responses to customer inquiries and on carriers’ web sites. Each carrier will also make such contact information available, upon request, to any customer calling the carrier’s customer service departments.
- A commitment to respond promptly (in writing, within 30 days) to consumer inquiries and complaints received from government agencies.

Sage has met the requirements of 47 C.F.R. §54.202 (a) (2).

**Financial and Technical Capability**

Citing to the comments of the Indiana Commission (in the Lifeline-Linkup Reform Docket) that “companies that have made a business case to service a certain market in a state prior to receiving Lifeline subsidies may be less inclined to risk being cited for non-compliance with the program,”<sup>14</sup> the FCC determined that a carrier seeking designation as an ETC for the purpose of offering only Lifeline service must demonstrate that it is financially and

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<sup>14</sup> Lifeline-Linkup Reform Order, fn 1010.

technically capable of providing the supported (Lifeline) service in compliance with the applicable rules.

Specifically, the FCC stated that “among the relevant considerations for such a showing would be whether the applicant previously offered services to non-Lifeline consumers, how long it has been in business, whether the applicant intends to rely exclusively on USF disbursements to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement or ETC revocation in any state.”<sup>15</sup>

Sage states in its initial petition that it satisfies the FCC’s criteria, and that it “has an excellent record of providing Lifeline service to qualified subscribers.”<sup>16</sup>

In support of its statements, Sage states that:

Sage has been in business since 1998, employing approximately 100 people, 95% of whom are located in Texas. Sage is authorized to provide competitive local and/or interexchange services in Arkansas, California, Colorado, Connecticut, Florida, Illinois, Indiana, Kansas, Kentucky, Michigan, Mississippi, Missouri, Montana, Nevada, New Mexico, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, South Carolina, South Dakota, Texas, Washington, Wisconsin, and Wyoming. Sage has been designated as an ETC for wireline service in Kansas, Oklahoma, Texas and Wisconsin. Sage currently has wireline Lifeline customers in five states for which it is reimbursed through state and/or federal programs, depending upon the state. In California, Sage receives support only from the California Public Utilities Commission’s (CPUC) Low Income Program. Sage also receives support from state programs in Kansas, Texas and Wisconsin. Less than 20% of Sage’s customers receive a subsidy from a low income program.<sup>17</sup>

Sage indicates that it has not been subject to any FCC enforcement action and states also that “no ETC designations held by Sage have been rescinded, revoked, or terminated by the FCC, nor have any states taken such action.”<sup>18</sup>

The Department believes that Sage has provided sufficient information for the Commission to conclude that it has the financial and technical ability to offer and provide Lifeline service to qualified consumers in Minnesota.

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<sup>15</sup> *Id.*, para. 388.

<sup>16</sup> Sage Petition, page 9.

<sup>17</sup> Sage petition, page 8.

<sup>18</sup> *Id.*, page 9.

**Sage's Description of its Lifeline Offerings**

Sage offers a variety of Lifeline plans as follows:

**Monthly Lifeline Pre-Paid Plans**

Plan	Minutes	Text	Data (MB)	Retail Price	Lifeline Discount	Net Cost to Lifeline Customer
<b>MobileFlex Essentials</b>	300	200	Blocked	\$9.25	- \$9.25	<b>\$0.00</b>
<b>MobileFlex Plus</b>	650	650	0	\$25.00	- \$9.25	<b>\$15.75</b>
<b>MobileFlex Value</b>	Unlimited	Unlimited	100	\$40.00	- \$9.25	<b>\$30.75</b>

**Tribal Lifeline Plan**

Plan	Minutes	Text	Data (MB)	Retail Price	Tribal Lifeline Discount	Net Cost to Tribal Lifeline Customer
<b>MobileFlex Value</b>	Unlimited	Unlimited	100	\$40.00	- \$34.25	<b>\$5.75</b>

All plans come with a free handset; include local and domestic long distance calls, and the following at no charge:

- Voicemail
- 3-Way Calling
- Call Waiting
- Caller ID
- Call Forwarding

Minutes are not decremented for calls to 911 or to customer service (611). Directory assistance (411) is provided at a charge of \$1.50 per request, and minutes are decremented from the customer's available balance.

Sage states that additional minutes may be purchased by purchasing an additional monthly plan. The Lifeline discount of \$9.25 however does not apply to additional purchased plans.

All purchased packages of additional minutes and/or texts, expire 30 days from the date of purchase.

Sage states that it "intends to serve qualified customers on tribal lands and claim enhanced Lifeline support for serving tribal Lifeline customers. Sage certifies that it will pass the full amount of the support it receives to the tribal customer. Eligible tribal Lifeline customers can choose Sage's MobileFlex Value plan which has unlimited minutes, unlimited texts and 100 MB of data for \$40.00; the net cost to a tribal Lifeline customer would be \$5.75."

The Department believes that Sage has adequately described its Lifeline offerings to meet the requirements of 47 C.F.R. §54.202(a)(5).

**PSAP Certification**

The FCC determined, in the Lifeline-Linkup Reform order, that it would no longer require Lifeline-only ETC applicants (in petitions brought before the FCC) to obtain certification from each PSAP that the applicants' phones are 911 and E911 compliant. However, the FCC specifically preserved states' rights to do so.

The Department of Public Safety (DPS) conducts a streamlined review on behalf of all Minnesota PSAPS, requiring that the applicant submit a sample handset for testing to ensure that the applicant's handsets are 911 and E911 capable regardless of the activation status of the phone, and the availability of minutes. Given the critical nature of access to 911 and E911 service, the Department supports such a proactive process, and recommends that the Commission retain this requirement.

In addition, in order to provide certification, DPS requires that applicants certify that they will pay appropriately into the 911/TAM funds. This occurs in conjunction with the testing of handsets.

Effective May 24, 2013, Minnesota Statute 403.11 was amended to add (among other changes) the following section:

Subd. 3d. **Eligible telecommunications carrier; requirement.** No wireless communications provider may provide telecommunications services under a designation of eligible telecommunications carrier, as provided under Minnesota Rule 7811.1400, until and unless the commissioner of public safety certifies to the chair of the public utilities commission that the wireless telecommunications provider is not in arrears in amounts owed to the 911 emergency telecommunications service account in the special revenue fund.

The Department has ascertained that DPS will provide said certification (as appropriate) for ETC applicants as part of its initial certification process.

Sage has not yet obtained certification from DPS, but has initiated contact with DPS and has begun the certification process. Sage understands that it will need to complete the certification process (including the new requirement above) and file its certificate, signed by DPS, *prior to* offering Lifeline service to qualified customers in Minnesota.<sup>19</sup>

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<sup>19</sup> Sage response to Department IR #2.

**Sage Wireless Customer Terms and Conditions/Informational Tariff**

Typically the Commission has required that an applicant submit and maintain an informational tariff or customer service agreement submitted by the ETC applicant (whether certification includes Lifeline-only or for the receipt of high-cost funds) for the purpose of disclosure, and to memorialize commitments that the applicant has made, and which the Commission has considered in its determination of whether to designate the applicant as an ETC. Typically the informational tariff that included the following:

- All rates associated with the universal service offering, including the cost of all equipment and installation charges and all other recurring and non-recurring charges.
- All terms and conditions of service associated with its universal service offering.
- Other services which may be added to the universal service offering.
- The specific exchange areas in which the ETC offers service.
- Commitment to provide clear notice to consumers of the Commission's contact information and the availability of this Commission in addressing customer questions, concerns, comments, and complaints.

Sage has filed a proposed informational tariff, which contains terms and conditions applicable to its Lifeline offerings. The Department will work with Sage to ensure that the informational tariff is complete and accurate and that the terms and conditions posted on Sage's website do not conflict with the Lifeline terms and conditions in its Minnesota informational tariff. The Department believes that minor tariff revisions and additions to the tariff may be accomplished as a compliance matter prior to operation.

**Public Interest**

The Commission has found, in its consideration of past ETC applications, that, in general, the designation of qualified competitive ETCs is in the public interest and comports with Minnesota's telecommunications goals of supporting universal service, maintaining just and reasonable rates, promoting customer choice, encouraging fair and reasonable competition for telephone service in a competitively neutral manner, and maintaining or improving quality of service,

As the FCC stated in the Lifeline-Linkup Reform Order, a primary goal of universal service is to provide voice service to low-income consumers at an affordable rate. Designation of Lifeline-only wireless ETCs like Sage enable low-income consumers, many of whom might not otherwise have access to wireless telephone service, to take advantage of the same services provided to other wireless consumers. The prepaid feature may provide a viable option for Lifeline customers who are concerned about additional usage charges or long-term contracts. The FCC has recognized that "a cell phone can literally be a lifeline for families and provide low-income families, in particular, the means to empower themselves."<sup>20</sup> Clearly, this is in the public interest.

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<sup>20</sup> Lifeline-Linkup Reform Order, para. 17.

Designation of additional wireless prepaid Lifeline-only ETCs will result in increased consumer choice and may engender competition among Lifeline-only ETCs, which may encourage designated carriers to differentiate and enhance their offerings to attract additional customers.

In addition to the increased opportunity for low-income consumers to take advantage of Lifeline offerings and the general public interest aspects of increased competition and choice, the Commission has typically evaluated the unique advantages and disadvantages of the applicant's service offering(s), including its "affordability" and/or adequacy of "free" minutes offered, and other commitments that the carrier makes, on a case by case basis.

#### *Affordability/Adequacy of Offering*

The Commission has previously found Lifeline offerings of 250 free minutes adequate, and Sage's basic Lifeline offering compares favorably to a 250 minute plan. In addition, Sage commits to offer, in Minnesota, the highest number of free minutes of usage and supplementary minutes at the lowest price offered by Sage in any other jurisdiction in which Sage provides wireless Lifeline service, provided that the available support is the same.<sup>21</sup> If the Commission determines that Sage should be granted ETC status in Minnesota, the Department recommends that the Commission incorporate Sage's commitment as a condition.

The Department notes that, largely in response to concerns expressed by consumer advocates in previous ETC designation dockets, the Commission has also made clear its expectations with respect to certain customer service policies and practices. To that end, the Commission has incorporated the following requirements in previous orders designating ETCs:

1. Customers should have access to *usable* phones. Frequent static or other interference on the line, lack of clarity, dropped calls, inability to place a call or receive a call under normal circumstances are not acceptable. If the buttons on phones are too small to use, for example, customers should have an opportunity to try a different make or model. Hearing-aid compatible handsets should be available to Lifeline-qualified customers, at no charge.
2. Policies regarding repair, maintenance, replacement of handsets, batteries, and chargers and options to purchase handsets should be clear to consumers, and available to consumers who do not have web access. Telrite should provide detailed information in writing, at the time of enrollment, of repair and replacement policies for phones and accessories (batteries, chargers) and purchase options.
3. Instruction manuals should be offered to consumers, and should be available upon request. It is not unreasonable to require that instruction manuals be provided to customers at the point of sale. If Telrite finds such a requirement

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<sup>21</sup> Sage response to Department IR#12.

burdensome, it should be required to make clear to customers, at the time of enrollment, the process for obtaining a manual.

4. Customers should have access to customer service without lengthy hold-times, and without use of air time minutes.
5. Consumers should have access to information, via telephone as well as website, on all Minnesota distribution events, locations, and times.<sup>22</sup>

The Department finds such principles reasonable and appropriate for application to other Lifeline-only ETCs including Sage.

#### *Usable Phones*

The Department notes that while neither the FCC nor this Commission have established specific requirements with respect to handset quality, it is reasonable to expect, as noted above, that any “free” phones offered to Lifeline-qualified customers are *usable*. The Department recommends that the Commission make clear in its Order, as it has in previous orders, its expectation that:

Customers should have access to *usable* phones. Frequent static or other interference on the line, lack of clarity, dropped calls, inability to place a call or receive a call under normal circumstances are not acceptable. If the buttons on phones are too small to use, for example, customers should have an opportunity to try a different make or model. Hearing-aid compatible handsets should be available to Lifeline-qualified customers, at no charge.

#### *Repair/Replacement Policies*

Sage has described its repair and phone replacement policies as follows:

Sage performs a test call on the phone prior to sending the phone to the customer to help ensure that it is operational. If the phone is not operational upon receipt, customer service will work with the customer to determine the issue. If the issue is with a charger or battery, then replacement components may be sent to the customer. If the phone itself is not working and there has been no usage on the phone beyond the test call, Sage will replace the phone with the same or similar model at no charge to the customer; however, Sage cannot guarantee

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<sup>22</sup> In the Matter of the Petition of Telrite Corporation for Designation as an Eligible Telecommunications Carrier, Docket No. P6962/M-11-132, *Order Granting ETC Designation*, Ordering paragraph 6 (a through e), November 28, 2012.



replacement will be the same model as models available in stock can vary.<sup>23</sup>

If the phone breaks after customer usage the customer may purchase a new phone at the retail rate. Sage has phones available starting at around \$28-\$30.

The Department recommends that the Commission make clear in its Order its expectation that:

Policies regarding repair, maintenance, replacement of handsets, batteries, and chargers and options to purchase handsets should be clear to consumers, and available to consumers who do not have web access. Sage should provide detailed information in writing, at the time of enrollment, of repair and replacement policies for phones and accessories (batteries, chargers) and purchase options.

#### *Operating Manuals*

Sage initially stated in response to Department questions that it provides manuals only with “some of” the handsets that are distributed to Lifeline customers. Sage subsequently stated, however, that it is working on creating handset instruction manuals to distribute to customers. While Sage has committed to do so, Sage has not yet confirmed that that it has created such manuals, and has not yet provided an example of the instructional materials it intends to distribute to Lifeline customers at the time of enrollment. Sage should be required to do so within 30 days of the Commission’s Order designating it as an ETC, and prior to operating as an ETC in Minnesota.

#### *Access to Customer Service*

Sage customers may reach customer service without decrementing minutes by dialing 611 from their handsets.

The Department agrees with the Commission’s statement that “Customers should have access to customer service without lengthy hold-times, and without use of air time minutes.” The Commission may wish to incorporate its expectation as a condition to granting ETC status to Sage.

#### *In-Person Distribution Events*

Sage states that it “has not identified any agents or retailers to distribute phones in Minnesota and/or to enroll Lifeline subscribers in Minnesota.”<sup>24</sup>

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<sup>23</sup> Sage May 19 response to the Department’s follow-up questions. (See DOC - Att. A).

<sup>24</sup> Sage response to Department IR #8.

To the extent that Sage conducts in-person distribution events, it should be required to provide consumers with access to information, via telephone as well as website, on its Minnesota distribution events, locations, and times.

*Commitment to Serve Qualified Customers within its Service Area*

The Department recommends that Sage be required to notify the Department and the Commission if it is unable to serve a Lifeline qualified customer within its service area upon reasonable request. Sage should be held to the same standard as other ETCs, and should be required to provide such notification within ten days of making the determination.

**Annual Reporting Requirements**

According to the FCC's Rules, Sage will be required to report annually on the following:

47 C.F.R §54.405 (e) (3) requires that eligible telecommunications carriers report annually, by month, the number of Lifeline subscribers de-enrolled for "non-usage."

47 C.F.R §54.420 provides for audits, every two years, of overall compliance with rules and the company's internal controls for companies that receive \$5 million or more annually on a holding company basis every two years.

Reports required by 47 C.F.R. §54.422 (a):

- The company name, holding company, operating companies and affiliates; names by which the ETC does business, and/or brand designations.
- Details with respect to the rates, terms, and conditions of any voice telephony service plans offered to Lifeline – eligible subscribers

Reports required by 47 C.F.R 54.422(b):

- Detailed information on outages;
- The number of complaints per 1000 connections;
- Certification of compliance with service quality standards and consumer protection rules;
- Certification that the carrier is able to function in emergency situations.

Certifications and reports required by 47 C.F.R. §54.416

- Certification re: policies and procedures that the carrier has in place to ensure that Lifeline subscribers are eligible to receive Lifeline services;
- Certification that the carrier is in compliance with all federal Lifeline certification procedures;
- Report results of annual re-certification (of subscribers) efforts.

Record-Keeping required by 47 C.F.R. §54.417

- Documentation of compliance with FCC and state requirements governing Lifeline for three full preceding years and requirement to provide such documentation

upon request from the FCC or the Universal service Administrative Company (USAC).

Reports required by 47 C.F.R. §54.422, and §54.416 must be filed with state commissions as well as with the FCC and the Universal Service Administrative Company (USAC).

The Department believes that the reports required by FCC rules provide adequate data for review of Lifeline-only ETC compliance. To the extent that the reports, customer complaints, or other issues warrant the Commission's review, the Department or other affected parties may bring those issues to the Commission on a case by case basis.

The Department believes that the Commission need take no action at this time with respect to a review specific to Sage.

## V. COMMISSION ALTERNATIVES

1. Find that Sage has made a credible showing of its capability and intent to provide and advertise an affordable, quality Lifeline offering, including "voice telephony" throughout its proposed service area, and that its designation for the provision of Lifeline is in the public interest. Grant Sage's petition for ETC status for the limited purpose of providing Lifeline service to qualifying Minnesota customers.
2. Find that Sage has not made a credible showing of its capability and intent to provide and advertise an affordable, quality Lifeline offering, throughout its proposed service area, or that its designation for the provision of Lifeline service is not in the public interest. Deny Sage's petition for ETC status.
3. Find that Sage has made a credible showing of its capability and intent to provide and advertise an affordable, quality Lifeline offering, throughout its proposed service area, and that its designation for the provision of Lifeline service is in the public interest subject to conditions. Approve Sage's petition for ETC status for the limited purpose of providing Lifeline service to qualifying Minnesota customers, conditioned upon some or all of the following:
  - a) Sage shall offer, in Minnesota, the highest number of free minutes of usage offered in any jurisdiction by Sage, and supplementary minutes offered at the lowest price offered in any other jurisdiction in which Sage provides wireless Lifeline service, provided that the available support is the same.
  - b) Within 30 days of the Commission's Order conditionally approving Sage's petition, Sage must submit a formal advertising and outreach plan listing the specific media through which it intends to advertise the availability of Lifeline service and a proposed schedule or anticipated frequency of such advertising in Minnesota. Sage should state whether it will sign customers up for Lifeline service and distribute phones at in-person events, and if so, describe its methodology for

doing so. Sage should provide information as to how often and at what locations such events will be conducted.

- c) Within 30 days of the Commission's Order conditionally approving Sage's petition, Sage must file a revised informational tariff as recommended by the Department herein. Sage should also be required to ensure that the Terms and Conditions applicable to Minnesota customers, posted on its website, do not conflict with the terms and conditions included in its Minnesota informational tariff.
- d) Sage should be required to notify the Commission and the Department, in writing, immediately upon any change to the Lifeline offering terms, conditions, or rates, or if it seeks to withdraw its Lifeline offering or any portion thereof. Sage must submit a revised tariff or customer service agreement page to reflect such changes.
- e) Sage shall report any unfulfilled requests of Lifeline-qualified customers. If it determines that it cannot reasonably serve a qualified consumer within its service area, it will report the unfulfilled request to the Department and the Commission within 10 days after making such a determination.
- f) Sage shall comply with the collection and remittance provisions of Minn. Stat. §§ 403.11 and 237.52.
- g) Sage must complete the certification process required by the Department of Public Safety and file its certificate, signed by DPS, prior to operating in Minnesota.
- h) Sage shall provide customers with access to usable phones. Frequent static or other interference on the line, lack of clarity, dropped calls, inability to place a call, or receive a call under normal circumstances are not acceptable. If the buttons on phones are too small to use, for example, Sage shall provide customers an opportunity to try a different make or model. Sage must make hearing-aid compatible handsets available to Lifeline-qualified customers, at no charge.
- i) Policies regarding repair, maintenance, replacement of handsets, batteries, and chargers and options to purchase handsets must be clear to consumers, and available to consumers who do not have web access. Sage shall provide detailed information in writing, at the time of enrollment, of repair and replacement policies for phones and accessories (batteries, chargers) and purchase options.
- j) Sage shall provide cell phone instruction manuals to its Lifeline customers. Within 30 days of the Commission's Order conditionally approving Sage's petition and prior to operating as an ETC in Minnesota, Sage must file a copy of the instructional materials that it will provide to its Lifeline customers upon enrollment.

- k) Sage shall provide its customers access to customer service without lengthy hold-times and without use of air-time minutes.
- l) To the extent that Sage conducts, or employs agents to conduct, in-person distribution events, it shall provide consumers with access to information, via telephone as well as website, on all Minnesota distribution events, locations, and times.

## VII. DEPARTMENT RECOMMENDATION

The Department recommends alternative 3, conditioned upon Sage's satisfying requirements (a) through (l). The Commission should find that Sage has made a credible showing of its capability and intent to provide and advertise an affordable, quality Lifeline offering throughout its proposed service area, and that its designation for the provision of Lifeline service will be in the public interest once the following conditions are met.

Approve Sage's petition for ETC status for the limited purpose of providing Lifeline service to qualifying Minnesota customers, conditioned upon the following:

- a) Sage shall offer, in Minnesota, the highest number of free minutes of usage offered in any jurisdiction by Sage, and supplementary minutes offered at the lowest price offered in any other jurisdiction in which Sage provides wireless Lifeline service, provided that the available support is the same.
- b) Within 30 days of the Commission's Order conditionally approving Sage's petition, Sage must submit a formal advertising and outreach plan listing the specific local and community newspapers and commercial broadcast stations in Minnesota through which it intends to advertise the availability of Lifeline service and a proposed schedule or anticipated frequency of such advertising. Sage should state whether it will sign customers up for Lifeline service and distribute phones at in-person events, and if so, describe its methodology for doing so. Sage should provide information as to how often and at what locations such events will be conducted.
- c) Within 30 days of the Commission's Order conditionally approving Sage's petition, Sage must file a revised informational tariff as recommended by the Department herein. Sage should also be required to ensure that the Terms and Conditions applicable to Minnesota customers, posted on its website, do not conflict with the terms and conditions included in its Minnesota informational tariff.
- d) Sage shall notify the Commission and the Department, in writing, immediately upon any change to the Lifeline offering terms, conditions, or rates, or if it seeks to withdraw its Lifeline offering or any portion thereof. Sage must submit a revised tariff or customer service agreement page to reflect such changes.

- e) Sage shall report any unfulfilled requests of Lifeline-qualified customers. If it determines that it cannot reasonably serve a qualified consumer within its service area, it will report the unfulfilled request to the Department and the Commission within 10 days after making such a determination.
- f) Sage shall comply with the collection and remittance provisions of Minn. Stat. §§ 403.11 and 237.52.
- g) Sage must complete the certification process required by the Department of Public Safety and file its certificate, signed by DPS, prior to operating in Minnesota.
- h) Sage shall provide customers with access to usable phones. Frequent static or other interference on the line, lack of clarity, dropped calls, inability to place a call, or receive a call under normal circumstances are not acceptable. If the buttons on phones are too small to use, for example, Sage shall provide customers an opportunity to try a different make or model. Sage must make hearing-aid compatible handsets available to Lifeline-qualified customers, at no charge.
- i) Policies regarding repair, maintenance, replacement of handsets, batteries, and chargers and options to purchase handsets must be clear to consumers, and available to consumers who do not have web access. Sage shall provide detailed information in writing, at the time of enrollment, of repair and replacement policies for phones and accessories (batteries, chargers) and purchase options.
- j) Sage shall provide cell phone instruction manuals to its Lifeline customers. Within 30 days of the Commission's Order conditionally approving Sage's petition and prior to operating as an ETC in Minnesota, Sage must file a copy of the instructional materials that it will provide to its Lifeline customers upon enrollment.
- k) Sage shall provide its customers access to customer service without lengthy hold-times and without use of air-time minutes.
- l) To the extent that Sage conducts, or employs agents to conduct, in-person distribution events, it shall provide consumers with access to information, via telephone as well as website, on all Minnesota distribution events, locations, and times.

/lt

# **DOC –Attachment A**

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6920/M-13-1176

Date of Request: March 4, 2014

Requested From: Lance J.M. Steinhart, Esq., Kasey Chow, Esq.  
Lance J.M. Steinhart, P.C., Attorneys at Law  
1725 Windward Concourse, Ste. 150  
Alpharetta, GA 30005  
[kchow@telecomcounsel.com](mailto:kchow@telecomcounsel.com) (E-mail)

Response Due: March 14, 2014

Analyst Requesting Information: Katherine Doherty

Type of Inquiry:    .....Financial            .....Rate of Return            .....Rate Design  
                         .....Engineering            .....Forecasting            .....Conservation  
                         .....Cost of Service            .....CIP                            .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
1	Please provide an advertising plan listing the specific means by which Sage Telecom Communications, LLC (Sage) will advertise the availability of its services throughout its designated service area. Please include specific newspapers, radio or television stations, and any other media of general distribution that Sage intends to use in Minnesota. Please include information with respect to the frequency and timing of such advertisements. Please describe Sage's outreach program and the specific locations and low-income community services where Sage will promote the availability of Lifeline service.
<b>Response:</b>	<b>Sage has yet to identify the specific means by which it will advertise in Minnesota. The Company intends to advertise the availability of its services throughout its designated service area through a combination of media channels, such as print advertisements, direct marketing, and the Internet. Sage's advertising materials will plainly and visibly make consumers aware of both the availability and price for Lifeline service. Sage expects that such advertisements will occur at least monthly. Furthermore, the Company will ensure annual distribution of outreach material to locations where such advertisements are expected to reach those consumers that are likely to qualify for Lifeline service, i.e. the Salvation Army, Department of Health and Human Services, public libraries, and Community Councils.</b>

Response by: Sherri Flatt

List sources of information:

Title: Executive Director of Regulatory Affairs

Department: Regulatory Affairs

Telephone: (214) 495-4847



**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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Request No.	
2	<p>Although the FCC determined that it would no longer require Lifeline-only ETC applicants (in petitions brought before the FCC) to obtain certification from each PSAP that the applicants' phones are 911 and E911 compliant, it preserved states' rights to do so. The Minnesota Department of Public Safety (DPS) conducts a streamlined review on behalf of all Minnesota PSAPS, requiring that the applicant submit a sample handset for testing to ensure that the applicant's handsets are 911 and E911 capable regardless of the activation status of the phone, and the availability of minutes. DPS also requires certification from the carrier that it will pay appropriately into the Minnesota State 911 fund.</p> <p>Has Sage received certification from DPS, or started the certification process? If not please contact DPS to begin the testing and certification process. Sage should contact: Dana Wahlberg State of Minnesota 911 Program Manager Department of Public Safety Office: 651-201-7546 E-mail Address: <a href="mailto:Dana.Wahlberg@state.mn.us">Dana.Wahlberg@state.mn.us</a></p> <p>Sage will need to complete DPS' certification process prior to operating in Minnesota.</p>
<b>Response:</b>	<p><b>Sage has not yet received certification from DPS; however, Sage will contact DPS to begin the testing and certification process. Sage understands that it will need to complete DPS' certification process prior to operating in Minnesota.</b></p>

Response by: Sherri Flatt

List sources of information:

Title: Executive Director of Regulatory Affairs

Department: Regulatory Affairs

Telephone: (214) 495-4847

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                          .....Cost of Service                    .....CIP                                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
8	Please list all agents and retailers that Sage will use in Minnesota to distribute phones and/or enroll Lifeline subscribers in Minnesota.
<b>Response:</b>	<b>Sage has not yet identified any agents or retailers to distribute phones in Minnesota and/or to enroll Lifeline subscribers in Minnesota.</b>  <b>Currently, Sage's own employees enroll Lifeline customers via direct telephone and/or internet contact with the customers completing the required certification forms and being approved before any Lifeline discount is applied to a customer's account.</b>

Response by: Sherri Flatt

List sources of information:

Title: Executive Director of Regulatory Affairs

Department: Regulatory Affairs

Telephone: (214) 495-4847

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**DEPARTMENT OF COMMERCE**

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                         .....Cost of Service            .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
12	Does Sage commit to offer, in Minnesota, the highest number of free minutes of usage offered in any jurisdiction by Sage, and supplementary minutes offered at the lowest price offered in any other jurisdiction in which Sage provides wireless Lifeline service, provided that the available support is the same?
<b>Response:</b>	<b>Sage commits to offer, in Minnesota, the highest number of free minutes of usage Sage offers in any jurisdiction, and supplementary minutes priced at the lowest level offered in any other jurisdiction where Sage provides wireless Lifeline service, provided that the available support is the same.</b>

Response by: Sherri Flatt

List sources of information:

Title: Executive Director of Regulatory Affairs

Department: Regulatory Affairs

Telephone: (214) 495-4847

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
15	Please provide a list of Minnesota exchanges or wire centers in which Sage will offer Lifeline service, if designated as an ETC.
<b>Response:</b>	<b>Please see Exhibit 3.</b>

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Response by: Sherri Flatt

List sources of information:

Title: Executive Director of Regulatory Affairs

Department: Regulatory Affairs

Telephone: (214) 495-4847

CLLI	EXCHANGE	COMPANY
BWVLMNXB	BROWNSVILLE	ACE TELEPHONE ASSOCIATION - MINNESOTA
DAKTMNXD	DAKOTA	ACE TELEPHONE ASSOCIATION - MINNESOTA
HOKHMNXH	HOKAH	ACE TELEPHONE ASSOCIATION - MINNESOTA
HSTNMNXH	HOUSTON	ACE TELEPHONE ASSOCIATION - MINNESOTA
LACRMNXL	LA CRESCENT	ACE TELEPHONE ASSOCIATION - MINNESOTA
OSTRMN XO	OSTRANDER	ACE TELEPHONE ASSOCIATION - MINNESOTA
PTSNMNX P	PETERSON	ACE TELEPHONE ASSOCIATION - MINNESOTA
RSFRMNX R	RUSHFORD	ACE TELEPHONE ASSOCIATION - MINNESOTA
ALBYMNXA	ALBANY	ALBANY MUTUAL TELEPHONE ASSOCIATION, INC
FRPTMNX F	FREEPORT	ALBANY MUTUAL TELEPHONE ASSOCIATION, INC
NWMNMNX N	NEW MUNICH	ALBANY MUTUAL TELEPHONE ASSOCIATION, INC
BENAMNXB	BENA	ARROWHEAD COMMUNICATIONS CORP.
CTTNMNX C	COTTON	ARROWHEAD COMMUNICATIONS CORP.
BCKSMNXB	BACKUS	ARVIG TELEPHONE CO.
BRPTMNXB	BREEZY POINT	ARVIG TELEPHONE CO.
HCKNMNXH	HACKENSACK	ARVIG TELEPHONE CO.
WMLKMNA A	HACKENSACK	ARVIG TELEPHONE CO.
IDCRMNX I	IDEAL COR	ARVIG TELEPHONE CO.
PQLKMNX P	PEQUOT LKS	ARVIG TELEPHONE CO.
PNRVMNX P	PINE RIVER	ARVIG TELEPHONE CO.
BOCKMNXB	BOCK	BENTON COOPERATIVE TELEPHONE CO.
FOTNMNX F	FORESTON	BENTON COOPERATIVE TELEPHONE CO.
GLMNMNX G	GILMAN	BENTON COOPERATIVE TELEPHONE CO.
RAMYMNX R	RAMEY	BENTON COOPERATIVE TELEPHONE CO.
RICEMNX R	RICE	BENTON COOPERATIVE TELEPHONE CO.
MPLSMND T	MORA	BIG RIVER TELEPHONE COMPANY, LLC - MO
BLERMNXB	BLUE EARTH	BLUE EARTH VALLEY TELEPHONE CO.
GCKNMNX G	GUCKEEN	BLUE EARTH VALLEY TELEPHONE CO.
HNTLMNXH	HUNTLEY	BLUE EARTH VALLEY TELEPHONE CO.
ELMRMNX E	STEVENS	BLUE EARTH VALLEY TELEPHONE CO.
WLLSMNX W	WELLS	BLUE EARTH VALLEY TELEPHONE CO.
WNNBMNX W	WINNEBAGO	BLUE EARTH VALLEY TELEPHONE CO.
ENFDMNX E	ENFIELD	BRIDGE WATER TELEPHONE CO.
MNTIMNX M	MONTICELLO	BRIDGE WATER TELEPHONE CO.
CLWYMNX C	CALLAWAY	CALLAWAY TELEPHONE EXCHANGE
BRCLMNXB	BRICELYN	CANNON VALLEY TELECOM, INC.
FRBRMNX F	FREEBORN	CANNON VALLEY TELECOM, INC.
FRSTMNX F	FROST	CANNON VALLEY TELECOM, INC.
MRTWMNX M	MORRISTOWN	CANNON VALLEY TELECOM, INC.
DLTHMNME	DULUTH	CENTURYTEL ACQ., LLC DBA KMC TELECOM III
BVCKMNXA	BEAVER CREEK	CENTURYTEL OF MINNESOTA, INC.
BRWSMNXA	BREWSTER	CENTURYTEL OF MINNESOTA, INC.
CLTNMNXA	CLINTON	CENTURYTEL OF MINNESOTA, INC.
DUNDMNXA	DUNDEE	CENTURYTEL OF MINNESOTA, INC.
FRFXMNXA	FAIRFAX	CENTURYTEL OF MINNESOTA, INC.

CLLI	EXCHANGE	COMPANY
FULDMNXA	FULDA	CENTURYTEL OF MINNESOTA, INC.
GBBNMNXA	GIBBON	CENTURYTEL OF MINNESOTA, INC.
HRCLKMNXA	HERON LAKE	CENTURYTEL OF MINNESOTA, INC.
HLCYMNXA	HILL CITY	CENTURYTEL OF MINNESOTA, INC.
HVLDMNXA	HOVLAND	CENTURYTEL OF MINNESOTA, INC.
ITSPMNXA	ITASCA STATE PARK	CENTURYTEL OF MINNESOTA, INC.
JFRSMNXA	JEFFERS	CENTURYTEL OF MINNESOTA, INC.
KLLGMNXA	KELLOGG	CENTURYTEL OF MINNESOTA, INC.
LFYTMNXA	LAFAYETTE	CENTURYTEL OF MINNESOTA, INC.
LMTNMNXA	LAMBERTON	CENTURYTEL OF MINNESOTA, INC.
MNETMNXA	MINNEOTA	CENTURYTEL OF MINNESOTA, INC.
PIRZMNXA	PIERZ	CENTURYTEL OF MINNESOTA, INC.
PSTNMNXA	PRESTON	CENTURYTEL OF MINNESOTA, INC.
RNVLMNXA	RENVILLE	CENTURYTEL OF MINNESOTA, INC.
RNLKMNXA	ROUND LAKE	CENTURYTEL OF MINNESOTA, INC.
RSHMMNXA	RUSHMORE	CENTURYTEL OF MINNESOTA, INC.
SPVYMNXA	SPRING VALLEY	CENTURYTEL OF MINNESOTA, INC.
WSBKMNXA	STORDEN	CENTURYTEL OF MINNESOTA, INC.
WLMTMNXA	WILMONT	CENTURYTEL OF MINNESOTA, INC.
MADLMNXM	ST JAMES	CHRISTENSEN COMMUNICATIONS COMPANY - MN
ALBOMNXB	ALBORN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ALDNMNXB	ALDEN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ALMLMNXA	ALMELUND	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ALVDMNXA	ALVARADO	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
KNYNMNXA	AMUND	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ARCOMNXA	ARCO	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ASKVMNXA	ASKOV	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ATWRMNXA	ATWATER	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
BLGRMNXB	BELGRADE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
BLPRMNXB	BLOOMING PRAIRIE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
BOYDMNXB	BOYD	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
BKTNMNXB	BROOKSTON	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
BWDLMNXB	BROWNSDALE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
BTFDMNXB	BUTTERFIELD	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
BYRNMNXB	BYRON	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CHGVMNXC	CHERRY GROVE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CLMTMNXA	CLAREMONT	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CLFDMNXC	CLARKFIELD	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CLGVMNXC	CLARKS GROVE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CLLKMNXA	CLEAR LAKE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CLWRMNXC	CLEARWATER	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CMFRMNXC	COMFREY	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CSMSMNXC	COSMOS	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CTWDMNXC	COTTONWOOD	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
CRWLMNXC	CROMWELL	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
DELNMNXD	DELANO	CITIZENS TELECOM CO MN-FRONTIER CITIZENS

CLLI	EXCHANGE	COMPANY
DLFTMNXD	DELFT	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
DNHMMNXD	DENHAM	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
DXTRMNXA	DEXTER	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
DDCTMNXD	DODGE CENTER	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ELDLMNXA	ELLEDALE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ELRSMNXE	ELROSA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ELY MNXE	ELY	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
FNSNMNXF	FINLAYSON	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
FLWDMNXF	FLOODWOOD	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
FONTMNXF	FOUNTAIN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
GRSNMNXG	GARRISON	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
GTWYMNXG	GATEWAY	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
GHNTMNXG	GHENT	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
HNFLMNXH	HANLEY FALLS	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
HRWKMNXH	HARDWICK	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
HYFDMNXA	HAYFIELD	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
HZRNMNXA	HAZEL RUN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
HCTRMNXA	HECTOR	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
HRMNMNXA	HERMAN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
HODLMNXH	HOLLANDALE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ISLEMNXI	ISLE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
JCBSMNXJ	JACOBSON	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
KDYHMNXA	KANDIYOHI	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
KTRVMNXK	KETTLE RIVER	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
KSTRMNXL	KIESTER	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
KMBRMNXK	KIMBERLY	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
LKLLMNXL	LAKE LILLIAN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
LNSTMNXL	LINDSTROM	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
LYNDMNXL	LYND	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
MALMMNXM	MALMO	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
MPPLMNXM	MAPLE PLAIN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
MAYRMNXM	MAYER	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
MCGRMNXM	MCGREGOR	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
MDLDMNXA	MEADOWLANDS	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
MILCMNXM	MILACA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
LYLEMNXM	MONA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
MONDMNXA	MOUND	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
MTLKMNXM	MOUNTAIN LAKE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
NWGRMNXXN	NEW GERMANY	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ODINMNXXO	ODIN-OMSBY	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ONAMMNXXO	ONAMIA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
PLSDMNXP	PALISADE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
PEASMNXP	PEASE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
PRBGMNXP	PRINSBURG	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
RYMNMNXA	RAYMOND	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
SCNDMNXXS	SCANDIA MARINE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS

CLLI	EXCHANGE	COMPANY
BGLWMNXB	SO BIGELOW	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
ADMSMNXB	SOUTHADAMS	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
STBNMNXS	ST BONIFACIUS	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
SGLKMNXS	STURGEON LAKE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
SVEAMNXS	SVEA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
TYFLMNXT	TAYLORS FALLS	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
TWHRMNXA	TWO HARBORS	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
TYLRMNXT	TYLER	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
WHKNMNXW	WAHKON	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
WNMNMNXW	WANAMINGO	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
WARBMNXA	WARBA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
WTTWMNXW	WATERTOWN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
WCNCMNXW	WEST CONCORD	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
WRGHMNXW	WRIGHT	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
WYNGMNXA	WYOMING	CITIZENS TELECOM CO MN-FRONTIER CITIZENS
BRVIMNXB	BARNESVL	CITY OF BARNESVILLE TELEPHONE UTILITY
CLCYMNXB	CLARA CITY	CLARA CITY TELEPHONE EXCHANGE CO.
MYNRMNXM	MAYNARD	CLARA CITY TELEPHONE EXCHANGE CO.
CLEMMNXC	CLEMENTS	CLEMENTS TELEPHONE CO.
FRDHMNXF	FREEDHEM	CONSOLIDATED TELEPHONE CO.
LEDRMNXL	LEADER	CONSOLIDATED TELEPHONE CO.
LNCLMNXL	LINCOLN	CONSOLIDATED TELEPHONE CO.
MSSNMNXM	MISSION	CONSOLIDATED TELEPHONE CO.
MTLYMNXM	MOTLEY	CONSOLIDATED TELEPHONE CO.
NKLMNXN	NOKAY LAKE	CONSOLIDATED TELEPHONE CO.
PLGRMNXP	PILLAGER	CONSOLIDATED TELEPHONE CO.
RNDLMNXR	RANDALL	CONSOLIDATED TELEPHONE CO.
SVLKMNXS	SULLIVANLK	CONSOLIDATED TELEPHONE CO.
CSLKMNXA	CROSS LAKE	CROSSLAKE TELEPHONE CO.
BLTNMNNO	MINNEAPOLIS1	CRYSTAL COMMUNICATIONS, INC - MN
NRFDMNNO	NORTHFIELD	CRYSTAL COMMUNICATIONS, INC - MN
DLVNMNXD	DELAVAN	DELAVAN TELEPHONE CO.
DNNLMNXD	DUNNELL	DUNNELL TELEPHONE CO., INC.
CLRSMNXC	CLARISSA	EAGLE VALLEY TELEPHONE CO.
BRTHMNXB	BERTHA	EAST OTTER TAIL TELEPHONE CO.
DRCKMNXD	DEER CREEK	EAST OTTER TAIL TELEPHONE CO.
DENTMNXD	DENT	EAST OTTER TAIL TELEPHONE CO.
LGVLMNXL	LONGVILLE	EAST OTTER TAIL TELEPHONE CO.
NEVSMNXN	NEVIS	EAST OTTER TAIL TELEPHONE CO.
NYMLMNXN	NEWYORK ML	EAST OTTER TAIL TELEPHONE CO.
OSAGMNXO	OSAGE	EAST OTTER TAIL TELEPHONE CO.
OTRTMNXO	OTTERTAIL	EAST OTTER TAIL TELEPHONE CO.
PRHMMNXP	PERHAM	EAST OTTER TAIL TELEPHONE CO.
VRGSMNXV	VERGAS	EAST OTTER TAIL TELEPHONE CO.
WLKRMNXW	WALKER	EAST OTTER TAIL TELEPHONE CO.
WPHMNXW	WHIPHOLT	EAST OTTER TAIL TELEPHONE CO.



CLLI	EXCHANGE	COMPANY
ESTNMNXE	EASTON	EASTON TELEPHONE CO.
NWPRMNXXN	NEW PRAGUE	ECKLES TELEPHONE CO.
ATKMNXXA	AITKIN	EMBARQ MINNESOTA
ALXNMXXA	ALEXANDRIA	EMBARQ MINNESOTA
ALXNMXXL	ALEXANDRIA	EMBARQ MINNESOTA
ALTRMNXXA	ALTURA	EMBARQ MINNESOTA
BNVLMNXXB	BENNETTVILLE	EMBARQ MINNESOTA
BNSNMNXXB	BENSON	EMBARQ MINNESOTA
BOVLMNXXB	BROWERVILLE	EMBARQ MINNESOTA
BRTNMNXXB	BROWNTON	EMBARQ MINNESOTA
BFLKMNXXB	BUFFALO LAKE	EMBARQ MINNESOTA
CARLMNXXC	CARLOS	EMBARQ MINNESOTA
CHSKMNXXC	CHASKA	EMBARQ MINNESOTA
COKTMNXXC	COKATO	EMBARQ MINNESOTA
CLGNMNXXC	COLOGNE	EMBARQ MINNESOTA
CRSBMNXXC	CROSBY	EMBARQ MINNESOTA
DSSLMNXXD	DASSEL	EMBARQ MINNESOTA
DRWDMNXXD	DEERWOOD	EMBARQ MINNESOTA
ELGNMNXXE	ELGIN	EMBARQ MINNESOTA
EYOTMNXXE	EYOTA	EMBARQ MINNESOTA
GLCOMNXXG	GLENCOE	EMBARQ MINNESOTA
GRFLMNXXG	GRANITE FALLS	EMBARQ MINNESOTA
GVCYMNXXG	GROVE CITY	EMBARQ MINNESOTA
HSNGMNXXH	HASTINGS	EMBARQ MINNESOTA
HMCYMNXXH	HOLMES CITY	EMBARQ MINNESOTA
HWLKMNXXH	HOWARD LAKE	EMBARQ MINNESOTA
LSPRMNXXL	LESTER PRAIRIE	EMBARQ MINNESOTA
LSTNMNXXA	LEWISTON	EMBARQ MINNESOTA
LNPRMNXXL	LONG PRAIRIE	EMBARQ MINNESOTA
MLVLMNXXM	MILLVILLE	EMBARQ MINNESOTA
NWLDMNXXN	NEW RICHLAND	EMBARQ MINNESOTA
NRWDMNXXN	NORWOOD	EMBARQ MINNESOTA
MPGVMNXXA	OSSEO	EMBARQ MINNESOTA
RGRSMNXXR	OSSEO	EMBARQ MINNESOTA
STMCMNXXS	OSSEO	EMBARQ MINNESOTA
PLVWMNXXP	PLAINVIEW	EMBARQ MINNESOTA
PLATMNXXP	PLATO	EMBARQ MINNESOTA
RLNGMNXXR	ROLLINGSTONE	EMBARQ MINNESOTA
SLLKMNXXS	SILVER LAKE	EMBARQ MINNESOTA
STWTMNXXS	STEWART	EMBARQ MINNESOTA
VCTAMNXXV	VICTORIA	EMBARQ MINNESOTA
VLRDMNXXV	VILLARD	EMBARQ MINNESOTA
WACNMNXXW	WACONIA	EMBARQ MINNESOTA
WDRFMNXXW	WALDORF	EMBARQ MINNESOTA
ZMFLMNXXZ	ZUMBRO FALLS	EMBARQ MINNESOTA
EMLYMNXXA	EMILY	EMILY COOPERATIVE TELEPHONE CO.

CLLI	EXCHANGE	COMPANY
CRGRMNXC	CERROGORDO	FARMERS MUTUAL TELEPHONE CO.
BBCYMNXB	BIG BEND	FEDERATED TELEPHONE COOPERATIVE
CHOKMNXC	CHOKIO	FEDERATED TELEPHONE COOPERATIVE
CRRLMNXA	CORRELL	FEDERATED TELEPHONE COOPERATIVE
DNVSMNXD	DANVERS	FEDERATED TELEPHONE COOPERATIVE
HLWYMNXA	HOLLOWAY	FEDERATED TELEPHONE COOPERATIVE
MILNMNXM	MILAN	FEDERATED TELEPHONE COOPERATIVE
HNCCMNXH	HANCOCK	FEDERATED UTILITIES, INC.
FETNMNXF	FELTON	FELTON TELEPHONE CO., INC.
HTRDMNXH	HITTERDAL	FELTON TELEPHONE CO., INC.
APVYMNXA	LINDSTROM	FRONTIER COMMUNICATIONS OF AMERICA, INC.
ADRNMNXA	ADRIAN	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
BRVLMNXA	APPLE VALLEY	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
FRTNMNXF	APPLE VALLEY	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
LKVLMNXL	APPLE VALLEY	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
RSMTMNXR	APPLE VALLEY	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
ARTNMNXA	ARLINGTON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
BLATMNXB	BALATON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
BLLPMNXA	BELLE PLAIN-JORDAN	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
JRDNMNXJ	BELLE PLAIN-JORDAN	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
CYLMNXC	CEYLON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
CURRMNXC	CURRIE	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
ECHNMNXE	E.CHAIN	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
EGTNMNXE	EDGERTON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
ELYSMNXE	ELYSIAN	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
FAMTMNXF	FAIRMONT	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
GRISMNXG	GREEN ISLE	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
HNSNMNXH	HENDERSON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
IVNHMNXI	IVANHOE	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
JNVLMNXJ	JANESVILLE	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
KLKNMNXK	KILKENNY	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
LKWLMNXL	LAKE WILSON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
LKFDMNXL	LAKEFIELD	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
LECTMNXL	LE CENTER	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
LEOTMNXL	LEOTA	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
LWVLMNXL	LEWISVILLE	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
MDSNMNXM	MADISON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
ELWOMNXE	MIDLAND	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
MTGMMNXM	MONTGOMERY	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
NROPMNXN	NORTHROP	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
OKBNMNXO	OKABENA	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
PTERMNXP	PORTER	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
SHBNMNXS	SHERBURN	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
SLTNMNXS	SLAYTON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
STLEMNXS	ST LEO	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
TRMTMNXT	TRIMONT	FRONTIER COMMUNICATIONS OF MINNESOTA, IN

CLLI	EXCHANGE	COMPANY
TRMNMNXT	TRUMAN	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
WLCMMNXW	WELCOME	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
WOTNMNXW	WORTHINGTON	FRONTIER COMMUNICATIONS OF MINNESOTA, IN
BGLYMNXB	BAGLEY	GARDEN VALLEY TELEPHONE CO.
BLTRMNXB	BELTRAMI	GARDEN VALLEY TELEPHONE CO.
BRKSMNXB	BROOKS	GARDEN VALLEY TELEPHONE CO.
ERSKMNXA	ERSKINE	GARDEN VALLEY TELEPHONE CO.
FRTL MNXF	FERTILE	GARDEN VALLEY TELEPHONE CO.
FSTNMNXF	FOSSTON	GARDEN VALLEY TELEPHONE CO.
GNVCMNXG	GONVICK	GARDEN VALLEY TELEPHONE CO.
GDRGMNXG	GOODRIDGE	GARDEN VALLEY TELEPHONE CO.
GLLYMNXG	GULLY	GARDEN VALLEY TELEPHONE CO.
LNGBMNXL	LENGBY	GARDEN VALLEY TELEPHONE CO.
LNRDMNXL	LEONARD	GARDEN VALLEY TELEPHONE CO.
MPBAMNXM	MAPLE BAY	GARDEN VALLEY TELEPHONE CO.
MCINMNXM	MCINTOSH	GARDEN VALLEY TELEPHONE CO.
MNTRMNXM	MENTOR	GARDEN VALLEY TELEPHONE CO.
MNRVMNXM	MINERVA	GARDEN VALLEY TELEPHONE CO.
OKLEMNXO	OKLEE	GARDEN VALLEY TELEPHONE CO.
PLMRMNXP	PLUMMER	GARDEN VALLEY TELEPHONE CO.
RLFLMNXR	REDLKFALLS	GARDEN VALLEY TELEPHONE CO.
SHVNMNXS	SHEVLIN	GARDEN VALLEY TELEPHONE CO.
STHRMNXS	ST HILAIRE	GARDEN VALLEY TELEPHONE CO.
WNGRMNXW	WINGER	GARDEN VALLEY TELEPHONE CO.
BRNDMNXB	BRANDON	GARDONVILLE COOPERATIVE TELEPHONE ASSN.
EVVLMNXE	EVANSVILLE	GARDONVILLE COOPERATIVE TELEPHONE ASSN.
GRFDMNXG	GARFIELD	GARDONVILLE COOPERATIVE TELEPHONE ASSN.
MIVLMNXM	MILLERVL	GARDONVILLE COOPERATIVE TELEPHONE ASSN.
GRADMNXG	GRANADA	GRANADA TELEPHONE CO.
BYLDMNXB	BYGLAND	HALSTAD TELEPHONE CO.
FSHRMNXF	FISHER	HALSTAD TELEPHONE CO.
HLSTMNXH	W HALSTAD	HALSTAD TELEPHONE CO.
NLVLMNXN	W NIELSVL	HALSTAD TELEPHONE CO.
CLMXMNXC	WESTCLIMAX	HALSTAD TELEPHONE CO.
SHLYMNXS	WESTSHELLY	HALSTAD TELEPHONE CO.
GDMDMNXG	GRAND MEADOW	HOME TELEPHONE CO.
RACNMNXR	RACINE	HOME TELEPHONE CO.
WYKFMNXW	WYKOFF	HOME TELEPHONE CO.
HTSNMNXH	HUTCHINSON	HUTCHINSON TELEPHONE CO.
LKBNMNXL	LAKEBENTON	INTERSTATE TELECOM. COOP., INC. - MINN
BYRVMNXB	BOY RIVER	JOHNSON TELEPHONE CO.
FDDMMNXF	FEDERALDAM	JOHNSON TELEPHONE CO.
REMRMNXR	REMER	JOHNSON TELEPHONE CO.
DANBMNXD	DANUBE	K M P TELEPHONE CO.
KRKHMNXX	KERKHOVEN	K M P TELEPHONE CO.
MRDCMNXM	MURDOCK	K M P TELEPHONE CO.

CLLI	EXCHANGE	COMPANY
PENCMNXP	PENNOCK	K M P TELEPHONE CO.
KSSNMNXX	KASSON	KASSON & MANTORVILLE TELEPHONE CO.
MNVLMNXXM	MANTORVL	KASSON & MANTORVILLE TELEPHONE CO.
RKDLMNXR	ROCK DELL	KASSON & MANTORVILLE TELEPHONE CO.
ANDLMNXXB	DASSEL	LAKEDALE LINK, INC.
MPLKMNXA	MAPLE LAKE	LAKEDALE TELEPHONE CO.
MTRSMNXXB	MONTROSE-WAVERLY	LAKEDALE TELEPHONE CO.
PYVLMNXP	PAYNESVILLE	LAKEDALE TELEPHONE CO.
SOHNMNXXS	SOUTH HAVEN	LAKEDALE TELEPHONE CO.
LSMRMNXXL	LISMORE	LISMORE COOPERATIVE TELEPHONE CO.
LNDLMNXXB	LONSDALE	LONSDALE TELEPHONE CO., INC.
ADBNMNXXA	AUDUBON	LORETEL SYSTEMS, INC.
CRMNMNXXC	CORMORANT	LORETEL SYSTEMS, INC.
FRAZMNXXF	FRAZEE	LORETEL SYSTEMS, INC.
GLYNMNXXG	GLYNDON	LORETEL SYSTEMS, INC.
LKPKMNXXL	LAKE PARK	LORETEL SYSTEMS, INC.
PLRPMNXXP	PELICANRPD	LORETEL SYSTEMS, INC.
PRLYMNXXP	WESTPERLEY	LORETEL SYSTEMS, INC.
LWRYMN01	LOWRY	LOWRY TELEPHONE CO.
HRLDMNXXH	HARTLAND	MANCHESTER - HARTLAND TELEPHONE CO.
MNCHMNXXM	MANCHESTER	MANCHESTER - HARTLAND TELEPHONE CO.
EDVYMNXXE	EDENVALLEY	MELROSE TELEPHONE CO.
GNWLMNXXG	GREENWALD	MELROSE TELEPHONE CO.
GRYEMNXXG	GREY EAGLE	MELROSE TELEPHONE CO.
KMBLMNXXK	KIMBALL	MELROSE TELEPHONE CO.
MLRSMNXXM	MELROSE	MELROSE TELEPHONE CO.
RCMDMNXXR	RICHMOND	MELROSE TELEPHONE CO.
STMNMNXXS	ST MARTIN	MELROSE TELEPHONE CO.
WTKNMNXXW	WATKINS	MELROSE TELEPHONE CO.
AMBYMNXXA	AMBOY	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
CMBAMNXXC	CAMBRIA	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
EGLKMNXXE	EAGLE LAKE	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
GRCYMNXXG	GARDENCITY	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
GDTHMNXXG	GOODTHUNDR	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
LKCRMNXXL	LK CRYSTAL	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
MDSLMNXXM	MADISON LK	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
MPTNMNXXM	MAPLETON	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
PMTNMNXXP	PEMBERTON	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
STCLMNXXS	ST CLAIR	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
VRCTMNXXV	VERNON CTR	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
BROTMNXXB	BROOTEN	MID-STATE TELEPHONE CO.
IRNGMNXXI	IRVING	MID-STATE TELEPHONE CO.
NWLNMNXXN	NEW LONDON	MID-STATE TELEPHONE CO.
SEDNMNXXS	SEDAN	MID-STATE TELEPHONE CO.
SPCRMNXXS	SPICER	MID-STATE TELEPHONE CO.
SNBGMNXXS	SUNBURG	MID-STATE TELEPHONE CO.

CLLI	EXCHANGE	COMPANY
TRRCMNXT	TERRACE	MID-STATE TELEPHONE CO.
EGBNMNXE	EAGLE BEND	MIDWEST TELEPHONE CO.
MLTNMNXM	MILTONA	MIDWEST TELEPHONE CO.
PRPRMNXP	PARKESPRRI	MIDWEST TELEPHONE CO.
URBNMN XU	URBANK	MIDWEST TELEPHONE CO.
FKLNMN XF	FRANKLIN	MINNESOTA VALLEY TELEPHONE CO., INC.
LUCNMN XL	LUCAN	MINNESOTA VALLEY TELEPHONE CO., INC.
MLRYMN XM	MILROY	MINNESOTA VALLEY TELEPHONE CO., INC.
NWULMN XN	NEW ULM	NEW ULM TELECOM, INC.
OSKSMN XO	OSAKIS	OSAKIS TELEPHONE CO.
ASHBMN XA	ASHBY	PARK REGION MUTUAL TELEPHONE CO.
DLTNMN XD	DALTON	PARK REGION MUTUAL TELEPHONE CO.
ERHRMN XE	ERHARD	PARK REGION MUTUAL TELEPHONE CO.
MAINMN XM	MAINE	PARK REGION MUTUAL TELEPHONE CO.
UNWDMN XU	UNDERWOOD	PARK REGION MUTUAL TELEPHONE CO.
VNNGMN XV	VINING	PARK REGION MUTUAL TELEPHONE CO.
BECDMN XB	BECIDA	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
DRRVMN XD	DEER RIVER	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
LAPTMN XL	LAPORTE	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
PPSKMN XP	PUPOSKY	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
SLWYMN XS	SOLWAY	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
SQLKMN XS	SQUAW LAKE	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
TRRVMN XT	TURTLE RIV	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
ORNCMN XO	ORONOCO	PINE ISLAND TELEPHONE CO.
PNISMN XP	PINEISLAND	PINE ISLAND TELEPHONE CO.
ALLEMN AL	ALBERT LEA	QWEST CORPORATION
APPLMN AP	APPLETON	QWEST CORPORATION
AVONMN VO	AVON	QWEST CORPORATION
BRNMMN BA	BARNUM	QWEST CORPORATION
BTLKMN BA	BATTLE LAKE	QWEST CORPORATION
BMDJMN BE	BEMIDJI	QWEST CORPORATION
OLIVMN OL	BIRD ISLAND	QWEST CORPORATION
BWBKMN BI	BIWABIK	QWEST CORPORATION
BRHMMN BR	BRAHAM	QWEST CORPORATION
BUHLMN BU	BUHL	QWEST CORPORATION
CMBRMN CA	CAMBRIDGE	QWEST CORPORATION
CRTOMN CB	CARLTON	QWEST CORPORATION
CSSLMN CL	CASS LAKE	QWEST CORPORATION
CTFDMN CH	CHATFIELD	QWEST CORPORATION
CHSHMN CS	CHISHOLM	QWEST CORPORATION
CLQTMN CA	CLOQUET	QWEST CORPORATION
CLSPMN CB	COLD SPRING	QWEST CORPORATION
CLRNMN CO	COLERAINE	QWEST CORPORATION
CMSTMN CO	COMSTOCK	QWEST CORPORATION
CKTNMN CR	CROOKSTON	QWEST CORPORATION
DTLKMN DL	DETROIT LAKES	QWEST CORPORATION

CLLI	EXCHANGE	COMPANY
DLTHMNAF	DULUTH	QWEST CORPORATION
DLTHMNCB	DULUTH	QWEST CORPORATION
DLTHMNLA	DULUTH	QWEST CORPORATION
DLTHMNPL	DULUTH	QWEST CORPORATION
ISLKMNIL	DULUTH	QWEST CORPORATION
FRBLMNFA	FARIBAULT	QWEST CORPORATION
FOLYMNFO	FOLEY	QWEST CORPORATION
GYLRMNGA	GAYLORD	QWEST CORPORATION
GLVLMNGL	GLENVILLE	QWEST CORPORATION
GLWDMNGL	GLENWOOD	QWEST CORPORATION
GDMRMNGM	GRAND MARAIS	QWEST CORPORATION
CHSTMNCH	GRAND RAPIDS	QWEST CORPORATION
GDRPMNGR	GRAND RAPIDS	QWEST CORPORATION
HWLYMNHA	HAWLEY	QWEST CORPORATION
HNNGMNHE	HENNING	QWEST CORPORATION
HBNGMNHI	HIBBING	QWEST CORPORATION
HNCKMNHI	HINCKLEY	QWEST CORPORATION
HLFRMNCO	HOLDINGFORD	QWEST CORPORATION
JCSNMNJA	JACKSON	QWEST CORPORATION
KEWTMNKE	KEEWATIN	QWEST CORPORATION
LESRMNLS	LE SUEUR	QWEST CORPORATION
LTFDMNLI	LITCHFIELD	QWEST CORPORATION
LTFLMNLF	LITTLE FALLS	QWEST CORPORATION
LVRNMNLU	LUVERNE	QWEST CORPORATION
MHNMMNMA	MAHNOMEN	QWEST CORPORATION
MRBLMNMA	MARBLE	QWEST CORPORATION
MRSHMNMA	MARSHALL	QWEST CORPORATION
ANOKMNAN	MINNEAPOLIS1	QWEST CORPORATION
BFLOMNBU	MINNEAPOLIS1	QWEST CORPORATION
BLANMNBL	MINNEAPOLIS1	QWEST CORPORATION
BLTNMNCE	MINNEAPOLIS1	QWEST CORPORATION
BRCTMNBC	MINNEAPOLIS1	QWEST CORPORATION
BRVLMNBU	MINNEAPOLIS1	QWEST CORPORATION
CNRPMNND	MINNEAPOLIS1	QWEST CORPORATION
CRYSMNCR	MINNEAPOLIS1	QWEST CORPORATION
CTGVMNCG	MINNEAPOLIS1	QWEST CORPORATION
EAGNMNLB	MINNEAPOLIS1	QWEST CORPORATION
EDPRMNEP	MINNEAPOLIS1	QWEST CORPORATION
EDPRMNGP	MINNEAPOLIS1	QWEST CORPORATION
EKRVMNER	MINNEAPOLIS1	QWEST CORPORATION
EXCLMNEX	MINNEAPOLIS1	QWEST CORPORATION
FRDLMNFR	MINNEAPOLIS1	QWEST CORPORATION
FRLKMNFL	MINNEAPOLIS1	QWEST CORPORATION
GLVYMNOR	MINNEAPOLIS1	QWEST CORPORATION
HAMLMNHB	MINNEAPOLIS1	QWEST CORPORATION
HNVRMNHB	MINNEAPOLIS1	QWEST CORPORATION

CLLI	EXCHANGE	COMPANY
HPKNMNHO	MINNEAPOLIS1	QWEST CORPORATION
ISNTMNIS	MINNEAPOLIS1	QWEST CORPORATION
MPLSMN07	MINNEAPOLIS1	QWEST CORPORATION
MPLSMNBB	MINNEAPOLIS1	QWEST CORPORATION
MPLSMNBE	MINNEAPOLIS1	QWEST CORPORATION
MPLSMNFR	MINNEAPOLIS1	QWEST CORPORATION
MPLSMNFS	MINNEAPOLIS1	QWEST CORPORATION
MPLSMNGE	MINNEAPOLIS1	QWEST CORPORATION
MPLSMNPE	MINNEAPOLIS1	QWEST CORPORATION
MPLSMNPI	MINNEAPOLIS1	QWEST CORPORATION
MPLSMNTF	MINNEAPOLIS1	QWEST CORPORATION
MPWDMNMA	MINNEAPOLIS1	QWEST CORPORATION
NSPLMNPR	MINNEAPOLIS1	QWEST CORPORATION
NVRRMNNA	MINNEAPOLIS1	QWEST CORPORATION
NWBTMNCL	MINNEAPOLIS1	QWEST CORPORATION
OKGVMNOG	MINNEAPOLIS1	QWEST CORPORATION
PLMOMNFE	MINNEAPOLIS1	QWEST CORPORATION
RCFDMN66	MINNEAPOLIS1	QWEST CORPORATION
RCFRMNRO	MINNEAPOLIS1	QWEST CORPORATION
SDVLMNSO	MINNEAPOLIS1	QWEST CORPORATION
SHKPMNSH	MINNEAPOLIS1	QWEST CORPORATION
STPLMNBE	MINNEAPOLIS1	QWEST CORPORATION
STPLMNEM	MINNEAPOLIS1	QWEST CORPORATION
STPLMNHBB	MINNEAPOLIS1	QWEST CORPORATION
STPLMNMI	MINNEAPOLIS1	QWEST CORPORATION
STPLMNMK	MINNEAPOLIS1	QWEST CORPORATION
WBLKMNWB	MINNEAPOLIS1	QWEST CORPORATION
WSPLMNWS	MINNEAPOLIS1	QWEST CORPORATION
WYZTMNWA	MINNEAPOLIS1	QWEST CORPORATION
DLTHMNDB	MONT DU LACWI	QWEST CORPORATION
MTVDMNMO	MONTEVIDEO	QWEST CORPORATION
MOLKMNML	MOOSE LAKE	QWEST CORPORATION
MORAMNMO	MORA	QWEST CORPORATION
MRRSMNMO	MORRIS	QWEST CORPORATION
NSHWMNNA	NASHWAUK	QWEST CORPORATION
STPRMNSP	NEW SWEDEN	QWEST CORPORATION
NCLTMNNC	NICOLLET	QWEST CORPORATION
NSSWMNNI	NISSWA	QWEST CORPORATION
NBRNMNNB	NORTH BRANCH	QWEST CORPORATION
OGLVMNOA	OGILVIE	QWEST CORPORATION
PKRPMNPR	PARK RAPIDS	QWEST CORPORATION
PNCYMNPC	PINE CITY	QWEST CORPORATION
PPSTMNPI	PIPESTONE	QWEST CORPORATION
PRTNMNPR	PRINCETON	QWEST CORPORATION
RDWNMNRW	RED WING	QWEST CORPORATION
RDFLMNRA	REDWOOD FALLS	QWEST CORPORATION

CLLI	EXCHANGE	COMPANY
RYTNMNRN	ROYALTON	QWEST CORPORATION
RSCYMNRC	RUSH CITY	QWEST CORPORATION
SABNMNSA	SABIN	QWEST CORPORATION
SNDSMNSA	SANDSTONE	QWEST CORPORATION
SKCTMNSC	SAUK CENTRE	QWEST CORPORATION
STCHMNSC	ST CHARLES	QWEST CORPORATION
STCDMNT0	ST CLOUD	QWEST CORPORATION
AFTNMNAF	ST CROIX BEACH	QWEST CORPORATION
STJSMNSJ	ST JOSEPH	QWEST CORPORATION
SPLSMNST	STAPLES	QWEST CORPORATION
STVLMNST	STEWARTVILLE	QWEST CORPORATION
STWRMNST	STILLWATER	QWEST CORPORATION
SWVLMNSV	SWANVILLE	QWEST CORPORATION
TRFLMNTH	THIEF RIVER FALLS	QWEST CORPORATION
TOFTMNTB	TOFTE	QWEST CORPORATION
TRACMNTR	TRACY	QWEST CORPORATION
EVLTMNEV	VIRGINIA	QWEST CORPORATION
MTIRMNMI	VIRGINIA	QWEST CORPORATION
VRGNMNV1	VIRGINIA	QWEST CORPORATION
WBSHMNWA	WABASHA	QWEST CORPORATION
WASCMNWA	WASECA	QWEST CORPORATION
WLMRMNWI	WILLMAR	QWEST CORPORATION
WINOMNWI	WINONA	QWEST CORPORATION
BRVIMNXR	BARNESVL	RED RIVER RURAL TEL ASSN. - MN
RLLGMNXR	ROLLAG	RED RIVER RURAL TEL ASSN. - MN
BLVWMNXB	BELVIEW	REDWOOD COUNTY TELEPHONE CO.
ECHOMNXE	ECHO	REDWOOD COUNTY TELEPHONE CO.
MRGBMNXM	MORGAN	REDWOOD COUNTY TELEPHONE CO.
RDFLMNXF	RED DEL	REDWOOD COUNTY TELEPHONE CO.
RDFLMNXR	RED DEL	REDWOOD COUNTY TELEPHONE CO.
SFTHMNXS	SEAFORTH	REDWOOD COUNTY TELEPHONE CO.
VESTMNXV	VESTA	REDWOOD COUNTY TELEPHONE CO.
WBSSMNXW	WABASSO	REDWOOD COUNTY TELEPHONE CO.
WLGVMNXW	WALNUT GROVE	REDWOOD COUNTY TELEPHONE CO.
WDLKMNXW	WOOD LAKE	REDWOOD COUNTY TELEPHONE CO.
RTHSMNXR	ROTHSAY	ROTHSAY TELEPHONE CO., INC.
BRRTMNXB	BARRETT	RUNESTONE TELEPHONE ASSOCIATION
CYRSMNXC	CYRUS	RUNESTONE TELEPHONE ASSOCIATION
DNLYMNXD	DONNELLY	RUNESTONE TELEPHONE ASSOCIATION
ELLKMNXE	ELBOW LAKE	RUNESTONE TELEPHONE ASSOCIATION
HFMNMNXH	HOFFMAN	RUNESTONE TELEPHONE ASSOCIATION
KETNMNXK	KENSINGTON	RUNESTONE TELEPHONE ASSOCIATION
NRCRMNXN	NORCROSS	RUNESTONE TELEPHONE ASSOCIATION
WNDLMNXW	WENDELL	RUNESTONE TELEPHONE ASSOCIATION
SCHRMNXS	SACREDHERT	SACRED HEART TELEPHONE CO.
NWMRMNXXN	NEW MARKET	SCOTT RICE TEL CO. DBA INTEGRA TELECOM



CLLI	EXCHANGE	COMPANY
WBSTMNXW	WEBSTER	SCOTT RICE TEL CO. DBA INTEGRA TELECOM
BCKRMNXA	BECKER	SHERBURNE COUNTY RURAL TELEPHONE CO.
BGLKMNXA	BIG LAKE	SHERBURNE COUNTY RURAL TELEPHONE CO.
GLNDMNXA	GLENDORADO	SHERBURNE COUNTY RURAL TELEPHONE CO.
ZMMNMNXA	ZIMMERMAN	SHERBURNE COUNTY RURAL TELEPHONE CO.
GODHMNXG	GOODHUE	SLEEPY EYE TELEPHONE CO.
HNSKMNXH	HANSKA	SLEEPY EYE TELEPHONE CO.
MZPPMNXM	MAZEPPA	SLEEPY EYE TELEPHONE CO.
SLEYMNXS	SLEEPY EYE	SLEEPY EYE TELEPHONE CO.
WHRKMNXW	WHITE ROCK	SLEEPY EYE TELEPHONE CO.
STRBMNXS	STARBUCK	STARBUCK TELEPHONE CO.
ULENMNXU	ULEN	TWIN VALLEY - ULEN TELEPHONE CO., INC.
WHERMNXW	WHITEEARTH	TWIN VALLEY - ULEN TELEPHONE CO., INC.
SHVWMNRI	LINDSTROM	U.S. LINK, INC.
BLTNMNSO	MINNEAPOLIS1	U.S. LINK, INC.
UPSLMNXU	UPSALA	UPSALA COOPERATIVE TELEPHONE ASSOCIATION
MNHGMNXM	MENAHGA	WEST CENTRAL TELEPHONE ASSOCIATION
NMRDMNXN	NIMROD	WEST CENTRAL TELEPHONE ASSOCIATION
SEBKMN01	SEBEKA	WEST CENTRAL TELEPHONE ASSOCIATION
VRDLMNXV	VERNDALE	WEST CENTRAL TELEPHONE ASSOCIATION
WLLKMNXW	WOLF LAKE	WEST CENTRAL TELEPHONE ASSOCIATION
SNBRMNXS	SANBORN	WESTERN TELEPHONE CO.
SPFDMNXS	SPRINGFLD	WESTERN TELEPHONE CO.
HOLTMNXH	HOLT	WIKSTROM TELEPHONE CO., INC.
VKNGMNXV	VIKING	WIKSTROM TELEPHONE CO., INC.
LKMLIA XO	SO EMMONS	WINNEBAGO COOP. TELEPHONE ASSN. - IOWA
WNSTMNXW	WINSTED	WINSTED TELEPHONE CO.
WNTHMNXW	WINTHROP	WINTHROP TELEPHONE CO.
WVTNMNXW	CHRISTINE	WOLVERTON TELEPHONE CO. - ND
GRVNMNXG	GARVIN	WOODSTOCK TELEPHONE CO.
HLLDMNXH	HOLLAND	WOODSTOCK TELEPHONE CO.
RSSLMNXA	RUSSELL	WOODSTOCK TELEPHONE CO.
RTTNMNXR	RUTHTON	WOODSTOCK TELEPHONE CO.
WDSTMNXW	WOODSTOCK	WOODSTOCK TELEPHONE CO.
ZMBRMNXZ	ZUMBROTA	ZUMBROTA TELEPHONE CO.

<b>mn_STATE</b>	<b>SHORT SWITCH</b>	<b>OCN_NAME</b>	<b>CATEGORY</b>	<b>RC ABBRE</b>
MN	SPLSMNST	QWEST CORPORATION	RBOC	STAPLES
MN	WLKRMNXW	EAST OTTER TAIL TELEPHONE CO.	ILEC	WALKER
MN	WABNMNXA	TWIN VALLEY - ULEN TELEPHONE CO., INC.	ILEC	WAUBUN
MN	WABNMNXW	TWIN VALLEY - ULEN TELEPHONE CO., INC.	ILEC	WAUBUN
MN	FSTNMNXF	GARDEN VALLEY TELEPHONE CO.	ILEC	FOSSTON
MN	ADA MNXA	LORETEL SYSTEMS, INC.	ILEC	ADA
MN	ATKMNXA	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	AITKIN
MN	BRNMMNBA	QWEST CORPORATION	RBOC	BARNUM
MN	BTLKMNBA	QWEST CORPORATION	RBOC	BATTLELAKE
MN	BLKDMNXB	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	ILEC	BLACKDUCK
MN	WHTNNDDB	QWEST CORPORATION	RBOC	BRECKENRDG
MN	CRSBMNXC	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	CROSBY
MN	HLCKMNXH	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	HALLOCK
MN	HNGMNHE	QWEST CORPORATION	RBOC	HENNING
MN	LNGBMNXL	GARDEN VALLEY TELEPHONE CO.	ILEC	LENGBY
MN	BUHLMNBU	QWEST CORPORATION	RBOC	BUHL
MN	CKTNMNCR	QWEST CORPORATION	RBOC	CROOKSTON
MN	DLTHMNAF	QWEST CORPORATION	RBOC	DULUTH
MN	DLTHMNDB	QWEST CORPORATION	RBOC	DULUTH
MN	DLTHMNCB	QWEST CORPORATION	RBOC	DULUTH
MN	DLTHMNME	QWEST CORPORATION	RBOC	DULUTH
MN	ISLKMNIL	QWEST CORPORATION	RBOC	DULUTH
MN	DLTHMNLA	QWEST CORPORATION	RBOC	DULUTH
MN	DLTHMNPL	QWEST CORPORATION	RBOC	DULUTH
MN	CLQTMNCA	QWEST CORPORATION	RBOC	CLOQUET
MN	ELY MNXE	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	ELY
MN	GDFRNDDB	QWEST CORPORATION	RBOC	EGRNDFORKS
MN	BMDJMNBE	QWEST CORPORATION	RBOC	BEMIDJI
MN	FRFLMNFB	QWEST CORPORATION	RBOC	FERGUS FLS
MN	GDMRMNGM	QWEST CORPORATION	RBOC	GRANDMRAIS
MN	GNTRMNXA	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK	ILEC	GRANDMRAIS
MN	CHSTMNCH	QWEST CORPORATION	RBOC	GRAND RPDS
MN	GDRPMNGR	QWEST CORPORATION	RBOC	GRAND RPDS
MN	BRNRMNBR	QWEST CORPORATION	RBOC	BRAINERD
MN	INFLMNXI	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	INTETNLFLS
MN	DTLKMNDL	QWEST CORPORATION	RBOC	DETROITLKS
MN	ISBLMNXI	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	ISABELLA
MN	BDDTMNXA	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK	ILEC	BAUDETTE
MN	WADNMNWA	QWEST CORPORATION	RBOC	WADENA
MN	FARGNDBC	QWEST CORPORATION	RBOC	MOORHEAD
MN	ITSPMNXA	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK	ILEC	PARKRAPIDS
MN	PKRPMNPR	QWEST CORPORATION	RBOC	PARKRAPIDS
MN	PRHMMNXP	EAST OTTER TAIL TELEPHONE CO.	ILEC	PERHAM
MN	TRFLMNTH	QWEST CORPORATION	RBOC	THIFRIVFLS
MN	SEBKMN01	WEST CENTRAL TELEPHONE ASSOCIATION	ILEC	SEBEKA
MN	ROSEMNXA	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK	ILEC	ROSEAU
MN	HBNGMNHI	QWEST CORPORATION	RBOC	HIBBING
MN	FNLDMNFO	QWEST CORPORATION	RBOC	SILVER BAY
MN	SLBAMNSA	QWEST CORPORATION	RBOC	SILVER BAY
MN	TWHRMNXA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWOHARBORS
MN	MTIRMNMI	QWEST CORPORATION	RBOC	VIRGINIA

<b>mn_STATE</b>	<b>SHORT SWITCH</b>	<b>OCN_NAME</b>	<b>CATEGORY</b>	<b>RC ABBRE</b>
MN	EVLTMNEV	QWEST CORPORATION	RBOC	VIRGINIA
MN	VRGNMNV	QWEST CORPORATION	RBOC	VIRGINIA
MN	MHNMMNMA	QWEST CORPORATION	RBOC	MAHNOMEN
MN	CLRNMNCO	QWEST CORPORATION	RBOC	COLERAINE
MN	TWVYMNXT	TWIN VALLEY - ULEN TELEPHONE CO., INC.	ILEC	TWINVALLEY
MN	LTFLMNL	QWEST CORPORATION	RBOC	LITTLE FLS
MN	SKCTMNSC	QWEST CORPORATION	RBOC	SAUKCENTRE
MN	MILCMNXM	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	MILACA
MN	APPLMNAP	QWEST CORPORATION	RBOC	APPLETON
MN	BNSNMNXB	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	BENSON
MN	GLWDMNGL	QWEST CORPORATION	RBOC	GLENWOOD
MN	HNCKMNH	QWEST CORPORATION	RBOC	HINCKLEY
MN	LNPRMNXL	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	LONGPRAIRI
MN	WLMRMNWI	QWEST CORPORATION	RBOC	WILLMAR
MN	MRRSMNMO	QWEST CORPORATION	RBOC	MORRIS
MN	ORVLMNOR	QWEST CORPORATION	RBOC	ORTONVILLE
MN	ALXNMNXL	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	ALEXANDRIA
MN	ALXNMNXA	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	ALEXANDRIA
MN	MORAMNMO	QWEST CORPORATION	RBOC	MORA
MN	PNCYMNPC	QWEST CORPORATION	RBOC	PINE CITY
MN	SNDSMNSA	QWEST CORPORATION	RBOC	SANDSTONE
MN	STCDMNT	QWEST CORPORATION	RBOC	ST CLOUD
MN	GLCOMNXG	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	GLENCOE
MN	HTSNMNA	HUTCHINSON TELEPHONE CO.	ILEC	HUTCHINSON
MN	HTSNMNXH	HUTCHINSON TELEPHONE CO.	ILEC	HUTCHINSON
MN	LTFDMNLI	QWEST CORPORATION	RBOC	LITCHFIELD
MN	MTVDMNMO	QWEST CORPORATION	RBOC	MONTEVIDEO
MN	OLIVMNOL	QWEST CORPORATION	RBOC	OLIVIA
MN	DWSNMNXD	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	DAWSON
MN	LNDLMNXB	LONSDALE TELEPHONE CO., INC.	ILEC	LONSDALE
MN	ROCHMNRO	QWEST CORPORATION	RBOC	ROCHESTER
MN	FRBLMNFA	QWEST CORPORATION	RBOC	FARIBAUT
MN	NRFDMNNO	QWEST CORPORATION	RBOC	NORTHFIELD
MN	OWTNMNOW	QWEST CORPORATION	RBOC	OWATONNA
MN	STPRMNSP	QWEST CORPORATION	RBOC	NEW SWEDEN
MN	ALLEMNAL	QWEST CORPORATION	RBOC	ALBERT LEA
MN	AUSTMNAB	QWEST CORPORATION	RBOC	AUSTIN
MN	BLERMNXB	BLUE EARTH VALLEY TELEPHONE CO.	ILEC	BLUE EARTH
MN	CNFLMNXC	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	CANNON FLS
MN	FAMTMNXF	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	FAIRMONT
MN	JCSNMNJA	QWEST CORPORATION	RBOC	JACKSON
MN	LVRNMNLU	QWEST CORPORATION	RBOC	LUVERNE
MN	BVCKMNXA	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK	ILEC	LUVERNE
MN	MRSHMNMA	QWEST CORPORATION	RBOC	MARSHALL
MN	MNKTMNXM	MANKATO CITIZENS TELEPHONE CO. DBA HICKORYTECH	ILEC	MANKATO
MN	NWULMNXX	NEW ULM TELECOM, INC.	ILEC	NEW ULM
MN	PPSTMNPI	QWEST CORPORATION	RBOC	PIPESTONE
MN	RDFLMNRA	QWEST CORPORATION	RBOC	REDWOODFLS
MN	TRACMNTR	QWEST CORPORATION	RBOC	TRACY
MN	WASCMNWA	QWEST CORPORATION	RBOC	WASECA
MN	WNDMMNWI	QWEST CORPORATION	RBOC	WINDOM

<b>mn_STATE</b>	<b>SHORT SWITCH</b>	<b>OCN_NAME</b>	<b>CATEGORY</b>	<b>RC ABBRE</b>
MN	WOTNMNXW	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	WORTHINGTN
MN	WINOMNWI	QWEST CORPORATION	RBOC	WINONA
MN	STPLMNBE	QWEST CORPORATION	RBOC	TWINCITIES
MN	WBLKMNWB	QWEST CORPORATION	RBOC	TWINCITIES
MN	WSPLMNWS	QWEST CORPORATION	RBOC	TWINCITIES
MN	WTTWMNXW	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	STPLMNMK	QWEST CORPORATION	RBOC	TWINCITIES
MN	STPLMNMI	QWEST CORPORATION	RBOC	TWINCITIES
MN	STPLMNHB	QWEST CORPORATION	RBOC	TWINCITIES
MN	STPLMNEM	QWEST CORPORATION	RBOC	TWINCITIES
MN	STBNMNXS	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	SHVWMNRI	QWEST CORPORATION	RBOC	TWINCITIES
MN	SHKPMNSH	QWEST CORPORATION	RBOC	TWINCITIES
MN	SDVLMNSO	QWEST CORPORATION	RBOC	TWINCITIES
MN	RSMTMNXR	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	TWINCITIES
MN	RCFRMNRO	QWEST CORPORATION	RBOC	TWINCITIES
MN	PLMOMNFE	QWEST CORPORATION	RBOC	TWINCITIES
MN	WYNGMNXA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	CNRPMNND	QWEST CORPORATION	RBOC	TWINCITIES
MN	RCFDMN66	QWEST CORPORATION	RBOC	TWINCITIES
MN	BLTNMNCE	QWEST CORPORATION	RBOC	TWINCITIES
MN	DELNMNXD	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	CTGVMNCG	QWEST CORPORATION	RBOC	TWINCITIES
MN	CRYSMNCR	QWEST CORPORATION	RBOC	TWINCITIES
MN	BRVLMNXA	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	TWINCITIES
MN	BRVLMNBU	QWEST CORPORATION	RBOC	TWINCITIES
MN	BRCTMNBC	QWEST CORPORATION	RBOC	TWINCITIES
MN	BLTNMNNSO	QWEST CORPORATION	RBOC	TWINCITIES
MN	WYZTMNWA	QWEST CORPORATION	RBOC	TWINCITIES
MN	BLLPMNXA	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	TWINCITIES
MN	BLANMNBL	QWEST CORPORATION	RBOC	TWINCITIES
MN	BFLOMNBU	QWEST CORPORATION	RBOC	TWINCITIES
MN	APVYMNXA	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	TWINCITIES
MN	ANOKMNAN	QWEST CORPORATION	RBOC	TWINCITIES
MN	ALMLMNXA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	BLTNMNNO	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPLSMNFR	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPLSMNDT	QWEST CORPORATION	RBOC	TWINCITIES
MN	OKGVMNOG	QWEST CORPORATION	RBOC	TWINCITIES
MN	NWGRMNXN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	NWBTMNCL	QWEST CORPORATION	RBOC	TWINCITIES
MN	NVRRMNNA	QWEST CORPORATION	RBOC	TWINCITIES
MN	NSPLMNPR	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPWDMNMA	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPPLMNXM	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	MPLSMNFS	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPLSMNTF	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPLSMNGE	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPLSMNPI	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPLSMNPE	QWEST CORPORATION	RBOC	TWINCITIES
MN	EAGNMNLB	QWEST CORPORATION	RBOC	TWINCITIES

<b>mn_STATE</b>	<b>SHORT SWITCH</b>	<b>OCN_NAME</b>	<b>CATEGORY</b>	<b>RC ABBRE</b>
MN	ISNTMNIS	QWEST CORPORATION	RBOC	TWINCITIES
MN	HNVRMNHB	QWEST CORPORATION	RBOC	TWINCITIES
MN	LKVLMNXL	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	TWINCITIES
MN	JRDNMNXJ	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	TWINCITIES
MN	HPKMNHNO	QWEST CORPORATION	RBOC	TWINCITIES
MN	HAMLMNHB	QWEST CORPORATION	RBOC	TWINCITIES
MN	GLVYMNOR	QWEST CORPORATION	RBOC	TWINCITIES
MN	FRTNMNXF	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.	ILEC	TWINCITIES
MN	FRLKMNFL	QWEST CORPORATION	RBOC	TWINCITIES
MN	FRDLMNFR	QWEST CORPORATION	RBOC	TWINCITIES
MN	EXCLMNEX	QWEST CORPORATION	RBOC	TWINCITIES
MN	EKRVMNER	QWEST CORPORATION	RBOC	TWINCITIES
MN	EDPRMNGP	QWEST CORPORATION	RBOC	TWINCITIES
MN	EDPRMNEP	QWEST CORPORATION	RBOC	TWINCITIES
MN	MAYRMNXM	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	MPLSMNBE	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPLSMNBB	QWEST CORPORATION	RBOC	TWINCITIES
MN	MPLSMN07	QWEST CORPORATION	RBOC	TWINCITIES
MN	MONDMNXA	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN	ILEC	TWINCITIES
MN	CMBRMNCA	QWEST CORPORATION	RBOC	CAMBRIDGE
MN	STWRMNST	QWEST CORPORATION	RBOC	STILLWATER
MN	RDWNMNRW	QWEST CORPORATION	RBOC	RED WING
MN	HSNGMNXH	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	HASTINGS
MN	LKCYMNXL	EMBARQ MINNESOTA DBA CENTURYLINK	ILEC	LAKE CITY
MN	WBSHMNWA	QWEST CORPORATION	RBOC	WABASHA
MN	PRTNMNPR	QWEST CORPORATION	RBOC	PRINCETON

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6920/M-13-1176

Date of Request: March 4, 2014

Requested From: Lance J.M. Steinhart, Esq., Kasey Chow, Esq.  
Lance J.M. Steinhart, P.C., Attorneys at Law  
1725 Windward Concourse, Ste. 150  
Alpharetta, GA 30005  
[kchow@telecomcounsel.com](mailto:kchow@telecomcounsel.com) (E-mail)

Response Due: March 14, 2014

Analyst Requesting Information: Katherine Doherty

Type of Inquiry:    .....Financial            .....Rate of Return            .....Rate Design  
                         .....Engineering            .....Forecasting            .....Conservation  
                         .....Cost of Service            .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
16	Sage states on page 12 of its petition that it has detailed Emergency Action and Disaster Recovery Plans in place to respond to emergencies. Please describe what specific procedures and plans Sage (or its underlying carrier) has in place in Minnesota to ensure continuation of service to customers in the event of a tornado, an ice storm, or flooding.
<b>Response:</b>	<b>Please see Exhibit 4, which is CONFIDENTIAL AND PROPRIETARY.</b>

Response by: Sherri Flatt

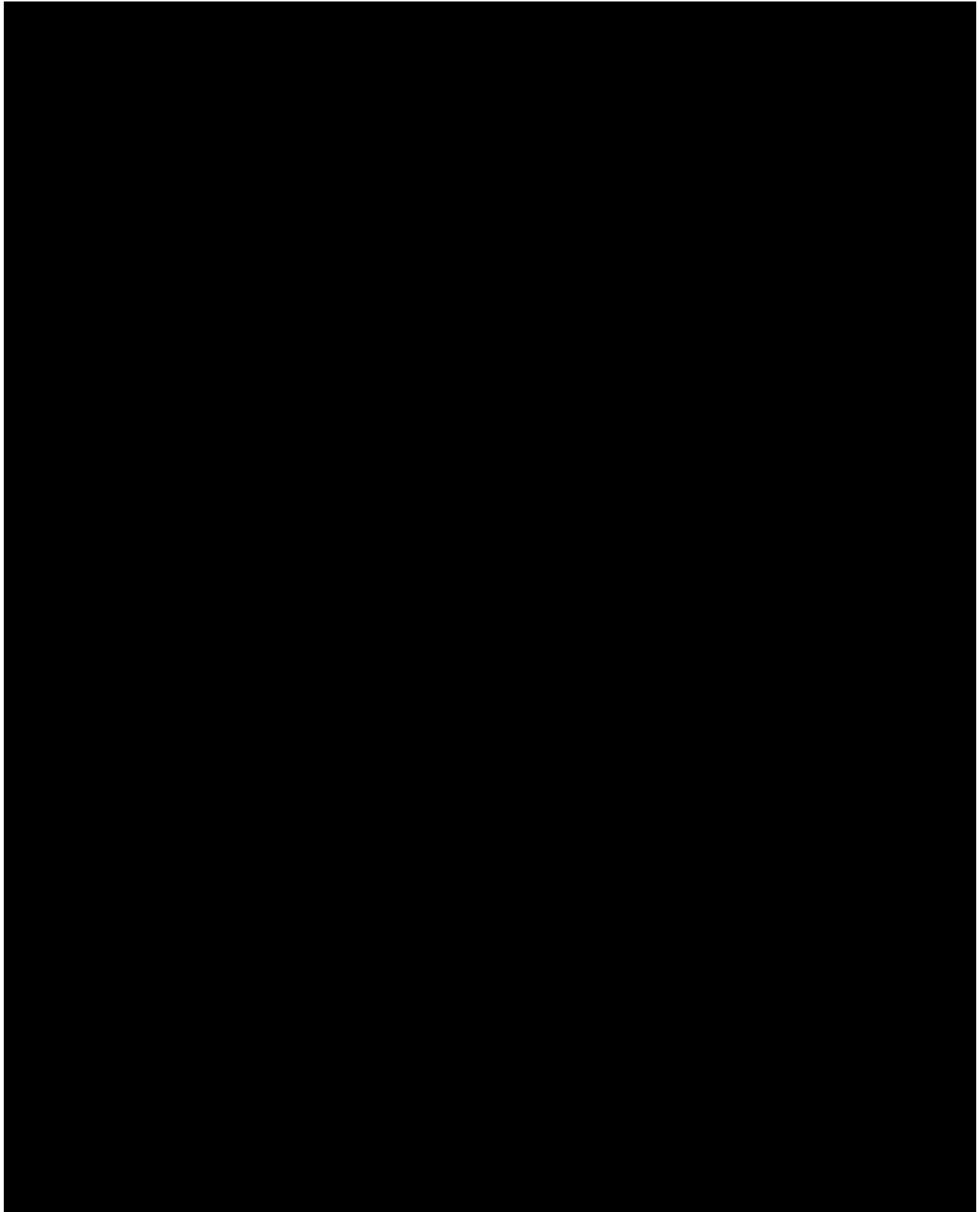
List sources of information:

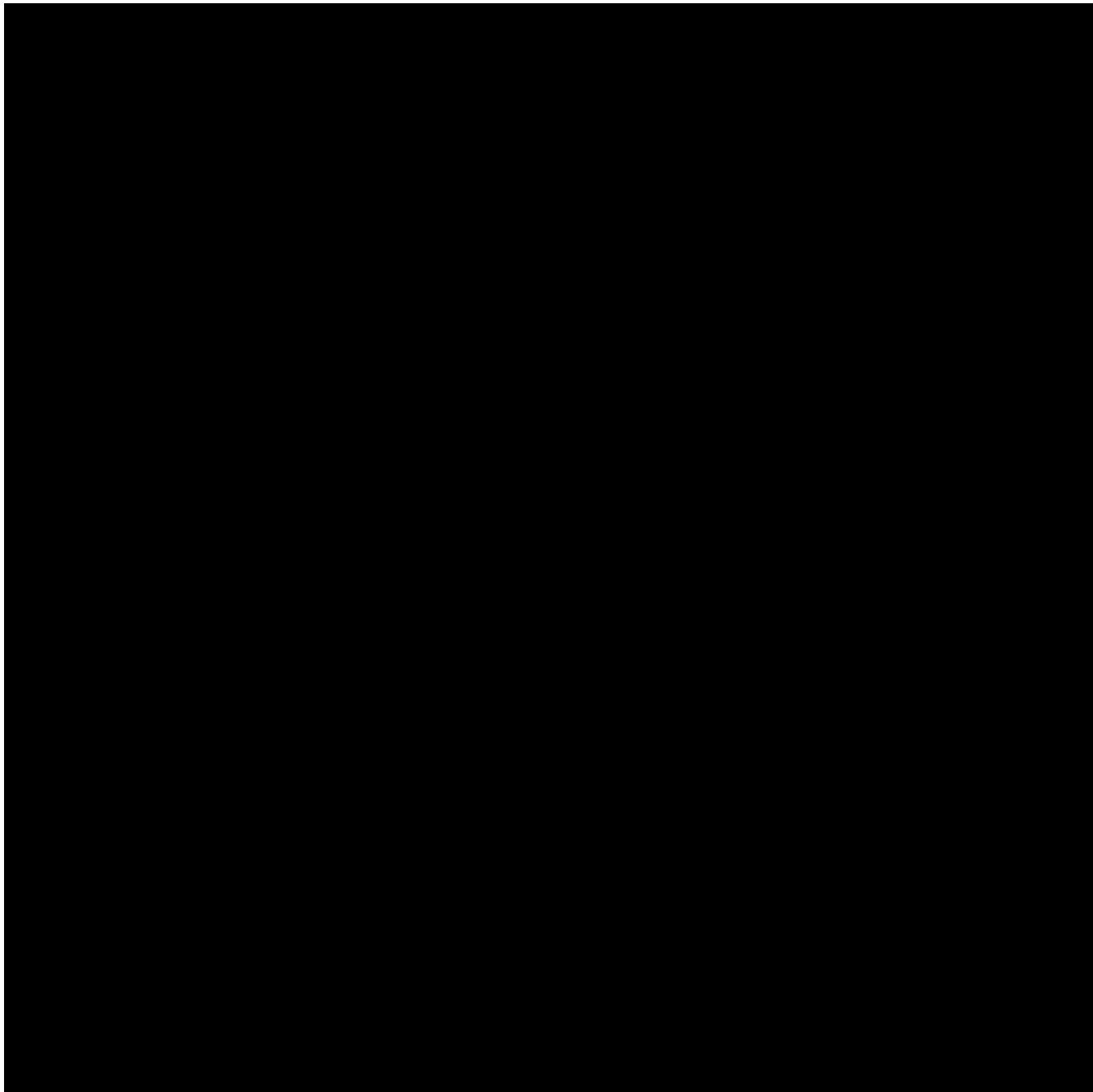
Title: Executive Director of Regulatory Affairs

Department: Regulatory Affairs

Telephone: (214) 495-4847

**SAGE TELECOM COMMUNICATIONS, LLC EMERGENCY OPERATIONS PLAN**







- 1) Could you please provide trade secret copies of the responses to IR # 7(financial statements) and IR #16 (Emergency Action and Disaster Plan) that are NOT password protected ? The documents should be marked "Trade Secret" (for Minnesota) rather than "confidential and proprietary."

**RESPONSE: Trade secret copies of the responses to IR #7 (financial statements) and IR #16 (Emergency Action and Disaster Plan) that are not password protected were marked "Trade Secret" and provided to Katherine Doherty via e-mail at [katherine.doherty@state.mn.us](mailto:katherine.doherty@state.mn.us) on Thursday May 8, 2014.**

- 2) Sage states in response to IR #10, that Sage customers will be charged roaming charges. Do roaming charges apply to Lifeline customers as well as other customers? If so, please describe the circumstances under which and where roaming charges apply in Minnesota. What are the applicable charges? How would a Lifeline customer know that he/she is in an area in which he/she will incur roaming charges?

**RESPONSE: Since cellular service is, by its nature, mobile and customers may take the phone with them outside of their normal "home" service area, Sage cannot guarantee that all service areas where customers may use their phone will be free of roaming charges. When the wireless phone is distributed to the Lifeline customer, the customer will also receive a coverage area map and a website link where customers may check coverage by zip code or a specific address. Also, Sage will send an informational text message to the customer whenever extra charges or overage charges exceeding \$3.50 occur on their account. This will provide notice to the customer that he/she is incurring roaming charges. Sage blocks roaming where such capability exists, and makes every effort with its underlying carriers to block roaming from occurring.**

**Lifeline customers would know that they are in an area in which they will incur roaming charges by checking the coverage map or searching by zip code or specific address. Some models of phones may show a different network indicator while roaming.**

- 3) The Lifeline Plans as described in the tariff differ from the Lifeline Plans described on page 11 of Sage's initial petition and in its FCC Compliance Plan. Which is correct?

**RESPONSE: The Lifeline plans described in the tariff are correct. The plans described in the initial petition and in Sage's FCC Compliance Plan are out-of-date.**

- 4) What optional features are available to Lifeline customers, and what are the specific charges associated with each? (See tariff page 20, Section 2.2.4 A(1).)

**RESPONSE: Optional features include MMS, data, International SMS, International MMS, and directory assistance calls.**

**Charges associated with each optional feature are outlined below:**

Plan	Cost	Lifeline Cost	Voice (min)	Text SMS	Include Data (MB)	MMS rate	Data rate	Int'l SMS rate	Int'l MMS rate	DA calls
MobileFlex Essentials	\$9.25	\$0.00	300	200	N/A	N/A	N/A	N/A	N/A	\$1.50/call
MobileFlex Plus	\$25.00	\$15.75	650	650	0	\$0.20	\$0.50	\$0.25	\$0.25	\$1.50/call
MobileFlex Value	\$40.00	\$30.75	unlimit	unlimit	100	\$0.15	\$0.15	\$0.20	\$0.20	2 free then \$1.50/call

**All of these services are set up as prepaid; customers would need to prepay, or have an extra balance in their accounts, in order to use these optional features. The exception is directory assistance calls.**

- 5) Sage states that its Lifeline customers may add minutes by purchasing another service plan. Is that the only way that Lifeline customers may purchase additional minutes? Do the initial minutes on the plans roll over from one month to the next if they are not used within the month? Do the additional purchased plan minutes roll over or do they expire at the end of the billing cycle (i.e. when additional Lifeline minutes are loaded). For example, if a Lifeline customer initially receives 300 minutes voice and 200 texts on day one, runs out of minutes and texts on day 15, and then purchases, on day 15, an additional mobileFlex essential plan (300 minutes/200 texts) on day 15 and still has 200 minutes and 50 texts left on day 31, does he/she lose those minutes and texts when new minutes are automatically loaded on day 1 of the following month?

**RESPONSE: Yes, at this time, purchasing an additional service plan is the only way that Lifeline customers may purchase additional minutes.**

**Minutes do not roll over from one month to the next. Each plan's minutes are available for 30 days. If the customer runs out of minutes on his/her initial plan and purchases additional minutes on the 15<sup>th</sup> those additional minutes purchased would be available until completely used or until the 15<sup>th</sup> of the following month.**

- 6) Does Sage provide new or refurbished handsets to its Lifeline customers? If Sage provides a combination of the two, please describe how it is determined whether a customer will receive a new or a used set, and provide the approximate percentage of phones distributed to Lifeline customers that are new.

**RESPONSE: Sage provides used and/or refurbished handsets to its Lifeline customers. Types and grades of the handsets may vary. All handsets include voice service, 911 service, caller ID, call waiting, 3-way calling, and voicemail.**

- 7) What is Sage's repair policy? I can't find anything addressing this on Sage's website. Please explain the circumstances under which Sage will replace or repair a Lifeline customer's handset. How does Sage determine whether or not there will be a charge to the customer? If there are charges, please specify what they are.

**RESPONSE:** Sage performs a test call on the phone prior to sending the phone to the customer to help ensure that it is operational. If the phone is not operational upon receipt, customer service will work with the customer to determine the issue. If the issue is with a charger or battery, then replacement components may be sent to the customer. If the phone itself is not working and there has been no usage on the phone beyond the test call, Sage will replace the phone with the same or similar model at no charge to the customer; however, Sage cannot guarantee replacement will be the same model as models available in stock can vary.

**If the phone breaks after customer usage, the customer may purchase a new phone at the retail rate. Sage has phones available starting around \$28-\$30.**

- 8) Does Sage provide operating manuals for the handsets it provides to Lifeline customers? If not how does the customer become aware of how to use his/her phone and its features?

**RESPONSE:** Some of the handsets provided to Lifeline customers are distributed with a User Guide. Otherwise, the Lifeline customer can contact Sage Customer Service for assistance.

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Comments**

**Docket No. P6920/M-13-1176**

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

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	Yes	OFF_SL_13-1176_M-13-1176
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_13-1176_M-13-1176
Kasey	Chow	kchow@telecomcounsel.com	Lance J.M. Steinhart, P.C.	1725 Windward Concourse  Suite 150 Alpharetta, GA 30005	Electronic Service	No	OFF_SL_13-1176_M-13-1176
Rocio	Gonzalez	rgonzalez@sagetelecom.net	Sage Telecom Communications, LLC	10440 N Central Expy Ste 700  Dallas, TX 75231-2228	Electronic Service	No	OFF_SL_13-1176_M-13-1176
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-1176_M-13-1176
Lance J.M.	Steinhart	info@telecomcounsel.com	Attorney at Law	1725 Windward Concourse Ste 150  Alpharetta, GA 30005	Electronic Service	No	OFF_SL_13-1176_M-13-1176
Daniel	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551022147	Electronic Service	Yes	OFF_SL_13-1176_M-13-1176