

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
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In the Matter of the Petition of CenturyLink QC
to be Regulated Pursuant to Minnesota Statute §
237.025; Competitive Market Regulation

DOCKET No. P-421/AM-16-496
DOCKET No. P-421/AM-16-547(HSTS)

**INITIAL BRIEF
OF THE DEPARTMENT OF COMMERCE**

Dated: March 9, 2017

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I. INTRODUCTION

On June 30, 2016, CenturyLink QC (CenturyLink) filed a petition seeking to be regulated pursuant to Minn. Stat. § 237.025, subd. 4 (1) (2016). CenturyLink petitioned for relief in 108 exchanges (later revised to 109) exchanges¹ of its 115 exchanges in Minnesota.² In 32 of the 109 exchanges, CenturyLink sought to demonstrate that wireless providers satisfied the statutory criteria requiring a qualifying competitive service provider. In the remaining 77 exchanges, CenturyLink based its analysis on the availability of cable or other wireline broadband providers.

CenturyLink provided evidence for the Minnesota Public Utilities Commission's (Commission's) consideration in the form of the affidavits, including an affidavit of Robert Brigham, and two each from Messrs. Al Lubeck and Adam Nelson.³ The Department of Commerce (Department) provided evidence for consideration in the form of the Affidavit of Ms. Joy Gullikson and the Affidavit of Mr. Wes Legursky, and submits this Initial Brief.

II. ARGUMENT

¹ In some of these 109 exchanges, there is more than one wire center. The Petition sought relief in 154 wire centers.

² CenturyLink Witnesses, Messrs. Brigham and Lubeck, in their Affidavits, each stated that all CenturyLink QC exchange service areas in Minnesota meet the criteria set forth in Minn. Stat. § 237.025, subd. 4 (1)" (Brigham Aff. ¶ 2, Lubeck Aff. ¶ 2) but CenturyLink did not request market based regulation in the following six wire centers/exchanges where the central office is located in another state and the customers served by that central office are in Minnesota:

- Estherville, served by a central office in Iowa
- Moorhead, served by a central office in North Dakota
- East Grand Forks, served by a central office in North Dakota
- Lake Park, served by a central office in Iowa
- Spirit Lake, served by a central office in Iowa
- Breckenridge, served by a central office in North Dakota.

Gullikson Aff. fn. 7 and Attach. 1

³ Mr. Lubeck explained, "Robert Brigham filed affidavits in support of this petition on June 30, 2016 and August 29, 2016" and Mr. Lubeck's Affidavit did not replace, but was "...intended to supplement those [Brigham's] filings but, for ease of reference will repeat and add to the information filed at that time." Lubeck Aff. ¶ 2.

A. CENTURYLINK BEARS THE BURDEN OF PROVING TO THE COMMISSION'S SATISFACTION THAT THE STATUTORY CRITERIA HAVE BEEN MET.

The burden to show that the competitive criteria of Minn. Stat. 237.025 subd. 4 have been met is on the petitioning local exchange carrier. Minn. Stat. 237.025 subd. 5. Placing the burden on CenturyLink in this proceeding comports with the well-established rule that the telephone utility has the burden of proof “with respect to all issues of material fact” and proof is required by a “preponderance of the evidence.”⁴ A regulated utility does not enjoy at any point in a Commission proceeding, a rebuttable presumption of reasonableness that other parties must overcome.⁵ The fact that the Department may not recommend complete disallowance of a petitioner’s requests, even though a petitioner did not show its entitlement to its entire request, does not mean that at any point in this proceeding the burden of proof shifts to the Department.⁶

Minn. Stat. § 237.025 allows a “local exchange carrier,”⁷ (LEC), in exchange service areas (exchanges) where it has received Commission approval to do so, to be regulated as a

⁴ *In re AT&T Communications of the Midwest, Inc.’s Petition for Arbitration with Contel of Minnesota, Inc. d/b/a GTE Minnesota under Section 252(b) of the Federal Telecommunications Act of 1996*, Order Resolving Arbitration Issues and Opening Cost Proceeding, MPUC Docket P-442, 407/M-96-939, p. 5 (December 12, 1996) (“1996 GTE Arbitration Order”).

⁵ *In re Northern States Power Co.*, 416 N.W.2d 719, 725-726 (Minn. 1987).

⁶ In its 1985 rate case, *In re Northern States Power Co.*, 416 N.W.2d 719, 725-726 (Minn. 1987.)Xcel argued that once it produced evidence on a particular issue, it had created a “rebuttable presumption of reasonableness” that could only be overcome by competent evidence in rebuttal.” The Commission “rejected that contention” because “the company had at all times the burden of proving the proposed rate change.” The Supreme Court agreed with the Commission. In Minnesota, a utility does not create a presumption of recovery merely by producing evidence.

⁷ A “local exchange carrier” is a telephone company or telecommunications carrier providing local exchange service. Minn. Stat. § 237.01, subd. 8. In this Petition, CenturyLink is the local exchange carrier.

“telecommunications carrier”⁸ under Minn. Stat. § 237.035, and as a “competitive local exchange carrier” (CLEC) under Minn. Rules 7811.2210 and 7812.2210.⁹

To obtain Commission approval in an exchange, a petitioner needs to demonstrate that a sufficient number of households can choose voice service from a facilities-based provider in that exchange. Specifically, a petitioner bears the burden of demonstrating, to the Commission’s satisfaction, that for each exchange included in its petition:

- The local exchange carrier serves fewer than 50 percent of the households; and
- At least 60 percent of households in that exchange can choose voice service from at least one unaffiliated competitive service provider.

Minn. Stat. § 237.025, subd. 4(1). To be deemed a “competitive service provider” (CSP) within the meaning of the statute, the competitor must be either a wireless provider or, alternatively, a cable or other wireline provider that has two principal attributes: the cable/wireline provider must *own last mile facilities* and *serve more than half* of the households in an exchange. Specifically, a CSP must be: “(1) a wireless voice service provider; or (2) any other provider of local voice service who owns a substantial proportion of the last-mile or loop facilities delivering service to a majority of households in an exchange service area, without regard to the technology used to deliver the service.” Minn. Stat. § 237.025 subd.1 (a). This means that a wireless, cable, or other broadband wireline provider can qualify as a CSP if it owns loop facilities delivering service to fifty-one or more percent of households in any specific exchange; however, a satellite company, affiliate of the petitioner, or other seller that lacks loop facilities and provides only

⁸ A “telecommunications carrier” is a person, firm, association, or corporation authorized to furnish one or more of the following telephone services to the public, but not otherwise authorized to furnish local exchange service: (1) interexchange telephone service; (2) local telephone service pursuant to a certificate. Minn. Stat. § 237.01 subd. 6.

⁹ Minn. Stat. § 237.025, subd. 6.

resold, UNE-P, virtual¹⁰, or “over-the-top” (OTT) voice services cannot qualify as a CSP even if it serves a majority of households in an exchange. Minn. Stat. § 237.025 subd. 1 (a) (2) (i-v). When evaluating a petition, Minn. Stat. § 237.025 is not to “be construed to provide or imply that a local exchange carrier regulated under this section is exempted from Minnesota Statutes and Minnesota Rules applying to competitive local exchange carriers,” such as Minn. Rules, Ch. 7810, which sets out service quality rules for telephone utilities.¹¹ Accordingly, except as expressly exempted by Minn. Stat. § 237.025, a petitioner remains subject to the laws applicable to all telecommunications carriers and CLECs, and bears the burden of demonstrating, that for each exchange included in the petition, that granting the petition as to any exchange will not obstruct compliance with the applicable Minnesota laws and rules. These laws and rules include not only Minn. Rules chapter 7810, regarding service quality, but also the statutory requirements that define the public interest the Commission protects.

Minn. Stat. § 237.011 provides the following public interests goals to be considered by the Commission in its oversight of telecommunications:

- A. Supporting universal service;
- B. Maintaining just and reasonable rates;
- C. Encouraging economically efficient deployment of infrastructure for higher speed telecommunication services and greater capacity for voice, video, and data transmission;
- D. Maintaining or improving quality of service;
- E. Promoting customers choice;

¹⁰ Wireless providers that resell voice services purchased at wholesale are mobile “virtual” network operators (MVNOs). https://en.wikipedia.org/wiki/Mobile_virtual_network_operator

¹¹ The statute states that such laws and rules as include but are not limited to:

- Sections 237.50 to 237.56 (regarding the telecommunications relay services , telecommunications access fund);
- Sections 237.66, 237.661, 237.663, and 237.665 (regarding notices to local service customers and prohibitions against unauthorized charges);
- Sections 237.69 to 237.71 (regarding the telephone assistance plan); and
- Minnesota Rules, chapter 7810 (including all service quality rules).

F. Ensuring consumer protections are maintained in the transition to a competitive market for local telecommunications service.

In weighing a petition, public interests required by law and rule to be protected include, at minimum, maintaining the existing quality of service¹² and consumer protections such as preserving the state's commitment to universal service (Minn. Stat. §§ 237.16 subd. 1 (a) (2); 237.16 subd. 8 (a) (8)) at affordable rates (Minn. Stat. §§ 237.16 subd. 1 (b) and subd. 8 (a) (8)) including access to voice-grade service, 911 emergency service¹³ and the telecommunications relay service (Minn. Stat. § 237.025 subd. 8 (a)). Thus, the Commission may choose not to grant a petition if a petitioner fails to meet its burden of demonstrating, to the Commission's satisfaction, that for each exchange included in the petition, households continue to receive the benefit of Minnesota laws on quality of service and consumer protection.

The Legislature has further detailed that the telecommunications services to be protected as part of "universal service" include, "*at a minimum, single-party service..., line quality capable of carrying facsimile and data transmissions; equal access; emergency services number capability; statewide telecommunications relay service [TRS] for people with hearing loss¹⁴; and blocking of long-distance toll services.*" Minn. Stat. § 237.16 subd. 9. TRS allow an individual

¹² See also Minn. Stat. § 237.16 subd. 8(a) (9) (requires Commission to prescribe standards for quality of service) and Minn. Rule 7810.5500 (requires telephone utilities to "provide satisfactory transmission ... at adequate volume levels and free of excessive distortion" and "noise and cross talk" that do not "impair communications.")

¹³ See also Minn. Stats. Ch. 403 and § 237.16 subd. 8(a) (10) (Commission must provide for the "continued provision of local emergency telephone services under chapter 403").

¹⁴ Protected telecommunications relay services (TRS) are the telecommunications transmission services required under Federal Communications Commission (FCC) regulations at 47 CFR pts. 64.604 to 64.606.

with a communication disability¹⁵ to use telecommunications services in a manner that is functionally equivalent to the ability of an individual who does not have a communication disability. Minn. Stat. § 237.50 subd. 11. Thus, the Commission may choose not to grant a petition if a petitioner fails to meet its burden of demonstrating, to the Commission’s satisfaction, that for each exchange included in the petition, households continue to receive Minnesota’s statutory minimums for universal service.

The minimal call quality, for all calls, requires “satisfactory transmission of communications between customers in their service areas. Transmission shall be at adequate volume levels and free of excessive distortion. Levels of noise and cross talk shall be such as not to impair communications.” Minn. Rule 7810.5500. Thus, the Commission may choose not to grant a petition if a petitioner fails to meet its burden of demonstrating, to the Commission’s satisfaction, that for each exchange included in the petition, the purported CSP is capable of providing this minimum satisfactory call quality.

B. CENTURYLINK HAS NOT SATISFIED THE “FIFTY PERCENT TEST” IN ALL EXCHANGES BY DEMONSTRATING THAT IT SERVES FEWER THAN 50 PERCENT OF THE HOUSEHOLDS.

1. The Fifty Percent Numerator: In All Exchanges CenturyLink Understated the Number of Wireline Households CenturyLink Serves.

For the Commission to grant a petition under Minn. Stat. § 237.025 the petitioner must demonstrate to the Commission’s satisfaction that in each exchange service area (exchange), the petitioner serves fewer than 50 percent (50/100ths) of the households. Gullikson Aff. ¶ 23. To calculate the ratio of CenturyLink-served households to total households, the numerator of the

¹⁵ “Communication disability” refers to a hearing loss, speech disability, or physical disability that makes it difficult or impossible to use telecommunications services and equipment. Minn. Stat. § 237.50 subd. 3.

ratio is the number of households CenturyLink serves in a wire center and the denominator is the total number of households in a wire center:

$$\frac{\text{Households served by CenturyLink}}{\text{Total households}}$$

Gullikson Aff. ¶ 25. CenturyLink’s Petition has both understated the numerator and overstated the denominator of this ratio. In this section of this Initial Brief we first turn to the numerator.

A. When Counting the Number of Access Lines It Sells to Households, CenturyLink Failed to Count Access Lines CenturyLink Sells to Farmers and Other Household Business Operators Who Subscribe Only to a Business Line.

To determine the numerator of the ratio of CenturyLink-served households to all households in an exchange, one needs to know how many households are served by CenturyLink. A household is “served” when CenturyLink supplies the facilities, or “access line,” to the household to enable the household to receive voice service¹⁶. Gullikson Aff. ¶ 30.

The Petitioner failed to account for CenturyLink’s provision of service to households from which a small business is operated and the household chooses to subscribe to a business line, and not to subscribe to a second, residential line. Farmers, day care operators, plumbers and tax filing businesses are typical examples of end users who may subscribe to a business line in order to receive a business listing in the telephone directory and a listing in the a yellow pages, as well as access to yellow pages advertising, and have no need to separately subscribe to residence service. Although this is a reasonable, ordinary practice, CenturyLink did not identify determine or estimate the number of households that purchase only a business line and no

¹⁶ Sometimes, a household may subscribe to more than one line. In the case where multiple lines serve a household, the Commission need only count the first, or “primary access” line. Gullikson Aff. ¶ 30.

separate residence line. The CenturyLink Petition understated the count of households CenturyLink serves in each wire center by failing to count these households. Gullikson Aff. ¶ 33.

In its Rebuttal, CenturyLink purported to address this insufficiency by arguing that the burden of proof should be shifted to the Department to prove the count of these lines: “Ms. Gullikson does not provide support for her apparent contention that such customers will exist in sufficient numbers in particular wire centers to make a difference in the outcome of this analysis.” Lubeck Second Aff. ¶ 22. Such a shift of the burden of proof is not consistent with Minn. Stat. § 237.025, subd. 5, which states “[t]he burden of proof to show that the competitive criteria of subdivision 4 have been met shall be on the petitioning local exchange carrier.”

In the limited time available for the Department to analyze and respond to CenturyLink’s Petition, the Department was unable provide a reliable estimate of the number of home-based businesses that subscribe to business lines in each of the CenturyLink exchanges at issue in the Petition, or to reflect in the Gullikson Affidavit an adjustment for those home-based businesses to the CenturyLink numbers.¹⁷ Because CenturyLink failed to include *any* home-based business lines, however the Department was able to conclude that CenturyLink understated the number of households to which it provides service in all wire centers. Gullikson Aff. ¶ 34.

B. When Counting the Number of Access Lines It Serves to Households, CenturyLink Failed to Count Any of the UNE-P or Resale Lines It Provides.

To accurately count the number of households that CenturyLink serves in each wire center required CenturyLink to include in its count the UNE-P and resale lines it sells in the wire

¹⁷ CenturyLink Resp. to DOC IR No. 43 stated “. . . If the household only has a business line, then CenturyLink does not provide residential service at the location and would not include this location as a residential household with service from CenturyLink.” The Company provided no other information from which a reliable estimate could be made.

center. CenturyLink's Petition, however, omitted resale and UNE-P lines in its counts of the number of households it serves. In its Response to Department Information Request (IR) No. 28, CenturyLink disclosed that in the various wire centers that are part of the Petition, approximately **[HIGHLY SENSITIVE TRADE SECRET BEGINS]** **[HIGHLY SENSITIVE TRADE SECRET ENDS]** percent of its lines are UNE-P and resold lines. Gullikson Aff, HSTS Errata Attach. 13 (CenturyLink Resp. to IR No. 28A and B) and HSTS Attach. 6, cols. E and F.

UNE-P lines¹⁸, are finished services that CenturyLink sells at wholesale to CLECs, for the CLECs to market and sell to end user customers.¹⁹ Resale lines are finished services sold to wholesalers who resell them to end users in a manner similar to UNE-P lines.²⁰ These UNE-P

¹⁸ UNE-P lines are also known as CenturyLink Local Service Platform (CLSP) products.

¹⁹ CenturyLink™ Local Services Platform (CLSP™) products provide local exchange telecommunications services to end-users on behalf of Competitive Local Exchange Carriers (CLECs) at competitive wholesale commercial rates. Functionally equivalent to comparable CenturyLink retail products, CLSP are finished services that require neither CLEC collocation nor other network involvement and are combinations of the following network elements:

- An Unbundled Local Loop (UBL); A facility or transmission path between the Distribution Frame or equivalent in the CenturyLink Central Office (CO) and the Demarcation Point at the end-user premises;
- A Local Switching Network Element Line Side or Trunk Side facility (switch port) including without limitation the basic switching function, plus the features, functions, and all vertical features that are loaded in CenturyLink's End Office Switch; and,
- The Shared Transport Network Element: The collective interoffice local transmission facilities between End Office Switches, between End Office Switches and Tandem Switches, and between Tandem Switches. CLEC traffic will be carried on the same facilities that CenturyLink uses for its own traffic.

From: <http://www.centurylink.com/wholesale/pcat/localservicesplatform.html>.

²⁰ Resale - Non-Facility Based Competitive Local Exchange Carrier (CLEC) products and services include nearly all of CenturyLink's retail telecommunications offerings provided in the Wholesale channel, generally with a Wholesale discount, for resale to your business and residential end-user customers. Resale products and services are provided in our CenturyLink QC to certified CLECs and Resellers under terms and conditions and rates of an Interconnection Agreement (ICA) or Commercial Agreement.

From: <http://www.centurylink.com/wholesale/pcat/resale.html>.

and discounted resale services exist only because CenturyLink is required by law²¹ to sell its “last mile” telephone plant to other phone companies, which in turn provide marketing, sales and service, and billing to the end user households.

Because CenturyLink has the burden of proof, Ms. Gullikson concluded that, if CenturyLink’s rebuttal continued to fail to distinguish between business and residential UNE-P lines, then the lines should be treated by the Commission as residential lines. Gullikson Aff. ¶ 35.

CenturyLink, in its rebuttal, did not provide data to distinguish between business and residential UNE-P lines. Through discovery, however, Department was able to obtain data to show that the resale lines identified in Gullikson Affidavit HSTS Attachment 6 are entirely residential; the Commission should add these resale lines to the count of CenturyLink-served residential lines in each exchange. Gullikson Affidavit Errata Attach 13 (CenturyLink Resp. to DOC IR No. 28A) indicates that CenturyLink maintains, a universal service ordering code (USOC) for resold lines that distinguishes sales to residential customers from sales to business customers. Gullikson Affidavit HSTS Attachment 6 includes only these residential resold lines.

Ms. Gullikson also concluded that it is reasonable to add these UNE-P and resale lines to the “Lines for households with CenturyLink Service,” because the voice service received by the household is ultimately provided by CenturyLink. Gullikson Aff. ¶ 36. CenturyLink in its rebuttal, however, disputed this conclusion, arguing that for resold and UNE-P lines, CenturyLink is the facilities provider, not the seller of the end user customer’s actual phone service, so these residential lines should not be treated as lines provided by CenturyLink, but as lines provided by a competitor. Lubeck Aff. ¶ 23. This is incorrect for two reasons.

²¹ 47 U.S.C. § 271.

First, the statute specifically prohibits CenturyLink’s proposed classification of UNE-P and resold lines as those of a CSP. Minn. Stat. § 237.025, subd. 1(2) (iii) clearly shows that the legislature did not consider these types of providers who lack facilities to be capable of providing meaningful competition, specifying that “‘competitive service provider’ does not include... a competitive local exchange carrier... who does *not own a substantial proportion of the last-mile or loop facilities* over which they provide local voice service.”

Second, Minn. Stat. § 237.025 requires the petitioner to prove that it “*serves* fewer than 50 percent of the households.” The statute does not distinguish between sellers and re-sellers of the service. In the case of UNE-P and resold lines, the actual communication service is provided entirely by CenturyLink, with the intermediary UNE-P or resale company providing only the ancillary marketing, sales and billing functions, not the actual service. Lacking facilities, UNE-P and re-sellers are incapable of providing actual service.

The Commission should reject CenturyLink’s rebuttal argument that it should be deemed not to serve UNE-P and resold services. Department Witness Ms. Gullikson correctly concluded that the Commission should include UNE-P and resale lines when counting the number of households served by CenturyLink lines. Gullikson Aff. ¶ 35.

C. The Complication of Unexplained Differences Between Messrs. Brigham and Lubeck’s Count of Lines Served by CenturyLink.

Messrs. Brigham (in his Exhibit RHB-3) and Lubeck (in his Exhibit AL-2) provided two different sets of CenturyLink access line counts regarding the numbers of households served by CenturyLink in each exchange. In response to Department discovery, CenturyLink stated: “the residential primary access lines shown in Confidential Exhibit RHB-3 are in error. CenturyLink is filing a corrected version of this exhibit.” Gullikson Aff. ¶ 30, Attach. 5 (CenturyLink Resp. to DOC IR No. 4). CenturyLink thereafter did not provide any corrected version of Exhibit

RHB-3, has not disclosed what the claimed “error” is, nor otherwise disclosed what the count/miscount was based on. Mr. Lubeck’s subsequent Affidavit dated November 18, 2016 did not address the issue, but it provided a second count of CenturyLink access lines to households in each exchange. Gullikson Aff. ¶ 31.²²

In response to the Department’s concerns in the Gullikson Affidavit over the record, Mr. Lubeck’s Second Affidavit again failed to file a corrected version of Exhibit RHB-3, did not disclose what the claimed “error” was, or otherwise disclose what the count/miscount was based on. Instead, it purported to shift to the Department the burden of establishing the CenturyLink primary line access count, chiding the Department for drawing to the Commission’s attention “the inaccurate primary line counts from Exhibit RHB-3” used to determine whether each exchange service area met the 50 percent test.²³

In light of the above, the Department, like its Witness, Ms. Gullikson, remains unable to state whether the counts of primary access lines by Messrs. Lubeck and Brigham are accurate or reliable; it continues to question what caused CenturyLink’s line counts to differ so greatly between Messrs. Brigham and Lubeck and why CenturyLink continues not to disclose the reason for the claimed error after it has been repeatedly questioned. Gullikson Aff. ¶ 31.

For these reasons, the Gullikson Affidavit Attachment 6, Column B shows the counts of CenturyLink primary access lines to households as reported by Mr. Brigham in his Exhibit RHB-

²² To further complicate its proffered evidence, CenturyLink Exhibits RHB-2, RHB-3, RHB-6 contain inconsistent counts of CenturyLink access lines, described in slightly different terms. RHB-2 calls its count “Residential Primary Access Lines”; RHB-3 calls its count, “Residence Household with CenturyLink Voice Service (Primary Access Lines); and RHB-6 calls its count, “Primary Res Access Lines.”

²³ Lubeck Second Aff. at ¶ 21

3. The CenturyLink primary access line counts to households as reported by Mr. Lubeck are shown in Column K of HSTS Attachment 6. Gullikson Aff. ¶ 32.

D. Summary: The Numerator of the “50 Percent Test” Should Include the UNE-P, Resale, and Business Lines In Each Exchange.

The Gullikson Affidavit HSTS Attachment 6, Columns G and H (Brigham’s counts) and M and N (Lubeck’s counts) summarizes the count of UNE-P and resale lines by wire center as well as the impact their inclusion has on whether CenturyLink meets the statutory criteria for market regulation in several exchanges.

As noted above, CenturyLink disclosed in discovery that approximately **[HIGHLY SENSITIVE TRADE SECRET BEGINS] [HIGHLY SENSITIVE TRADE SECRET ENDS]** percent of the primary access lines in the exchanges that are part of the Petition are UNE-P and resold lines. Gullikson Aff, HSTS Errata Attach. 13 (CenturyLink Resp. to DOC IR No. 28A and B) and Attach. 6, cols. E and F.

If the Commission accepts Mr. Brigham’s counts of lines served by CenturyLink, but adds UNE-P lines and resale lines, there are fourteen wire centers (eleven exchanges),²⁴ where CenturyLink serves more than 50 percent of the households. Gullikson Aff. ¶ 37, Attach. 6, Col. H. (These are Cook, Tofte, Grand Marais, Swanville, Island Lake, Biwabik, Silver Bay, Pike Lake, Finland, Pine City, Coleraine, Comstock, Carlton, and Mora.)

If the Commission accepts Mr. Lubeck's count of Primary Access lines, when UNE-P and resale lines are included, there are five wire centers/exchanges where CenturyLink serves more

²⁴ The wire centers of Island Lake and Pike Lake are part of the larger Duluth exchange which serves, in aggregate, fewer than 50 percent of the households in the exchange. The wire centers of Silver Bay and Finland are two wire centers that constitute one exchange (Silver Bay).

than 50 percent of the households. Gullikson Aff. ¶ 37, HSTS Attach. 6, Col. N. (Cook, Tofte, Grand Marais, Swanville, and Island Lake.)

In summary, the Department recommends that the Commission find that CenturyLink failed to disclose in its Petition, and subsequently continued to understate the number of households it serves by failing to include UNE-P and resale lines that provide voice service to households. The Department recommends that the Commission include the UNE-P and resale lines when determining the number of households served by CenturyLink. Gullikson Aff. ¶ 38.

The Commission should give consideration to whether CenturyLink has satisfied 50 percent statutory test in additional exchanges, where CenturyLink has only marginally satisfied the “50 percent test,” in light of CenturyLink’s failure to provide an accounting -- or even an estimate -- of households that purchase only CenturyLink business lines. Gullikson Aff. ¶ 39. The exchanges that only marginally satisfy the 50 percent test are identified in **Table 2**, below.

2. The Fifty Percent Denominator: CenturyLink’s Count of Households Is Overstated In Four Wire Centers.

As noted above, the Petitioner must demonstrate to the Commission’s satisfaction that it serves fewer than 50 percent of the households in each exchange. Gullikson Aff. ¶ 23. To determine the percentage of households in an exchange that are served by CenturyLink, one calculates the ratio of CenturyLink-served households to total households. Gullikson Aff. ¶ 25. The numerator of the ratio is the number of households CenturyLink serves and the denominator is the total number of households in a wire center:

$$\frac{\text{Households served by CenturyLink}}{\text{Total households}}$$

In this section of this Initial Brief, the Department discusses four wire centers where the Commission should reject CenturyLink’s Petition because CenturyLink’s evidence and argument

unreasonably inflates the denominator of this ratio in order to reduce the percentage of households served by CenturyLink to less than 50 percent.

To set the denominator of the ratio, the Commission must determine the number of households in a wire center. Minn. Stat. § 237.025 does not define the term “household” (Gullikson Aff. ¶ 26) but CenturyLink and the Department agreed that the term “household” should have the conventional meaning, as used by the federal Census Bureau. That definition of household refers to *people* who occupy a usual place of residence²⁵ That is, “households” consist of people, not vacant property. Lubeck Aff. fn. 4; Gullikson Aff. ¶ 26-27, 29.

In four wire centers, Cook, Grand Marais, Tofte and Island Lake, CenturyLink serves the majority of households, and, as the dominant provider, does not meet the 50 percent test. In the Cook wire center, for example CenturyLink serves between **[HIGHLY SENSITIVE TRADE SECRET BEGINS** **[HIGHLY SENSITIVE TRADE SECRET ENDS]** percent of the households.²⁶ CenturyLink proposes in these wire centers that the term “household” in Minn. Stat. 237.025 subd. 4 should be construed to mean “housing unit,” also as used by the Census. Gullikson Aff. ¶ 27 (*citing* Lubeck Aff. ¶¶ 9-10). The Department disagrees.

The term “housing unit” refers not to people living together, but to the building or other “living quarters” “where people live, stay, or *could* live...[including] structures intended for nonresidential use as well as tents, vans, shelters for people without housing...and so forth...”²⁷

²⁵ A household includes all the people who occupy a housing unit *as their usual place of residence*. A household includes the related family members and all the unrelated people, if any, who share the housing unit. *The count of households excludes group quarters.* <https://www.census.gov/glossary/>. *Households do not include vacant housing units.* Lubeck Aff., p. 4, fn. 4.

²⁶ Gullikson Aff. HSTS Attach. 6, cols. H (Mr.Brigham’s count of lines) and N (Mr. Lubeck’s count).

²⁷ <https://www.census.gov/glossary/> (emphasis added.)

“Housing unit” in northern Minnesota includes not only the second homes and snowbirds’ summer residences in the four affected wire centers, but also includes the many rustic and off-grid cabins, tent camp grounds, mobile homes and pop-up trailers, seasonal hunting and fishing shacks, and other such places where people live or “could live” in temporary “living quarters.” It refers to both occupied and vacant real estate.²⁸

The Department disagrees that the term “household” can or should be construed to mean non-household-occupied “housing units”. Such a construction would not comport with ordinary rules of statutory construction and would result in an inappropriate inflation -- without evidentiary support for the inflation -- of the denominator of the ratio of CenturyLink-served households to all households in the four wire centers.

A. Statutory Interpretation of the Term “Household” to Mean “Housing Unit” is Inappropriate.

Minn. Stat. § 237.025 states that a petitioning local exchange carrier must demonstrate to the commission's satisfaction that: “it serves fewer than 50 percent of the households...and at least 60 percent of households...can choose voice service from at least one additional...provider.”

When attempting to apply a law, the decision-maker attributes to words their common and ordinary meaning²⁹ and construes a statute to give effect to all its provisions.³⁰ CenturyLink offered no argument or evidence to support its claim that the legislature meant its directive in Minn. Stat. § 237.025, that “households” be able to “choose voice service,” to refer, in selected

²⁸ A housing unit is a “vacant housing unit” if no one is living in it at the time of enumeration, which is April 1 of each year when the census is taken. <https://www.census.gov/glossary/>.

²⁹ Minn. Stat. § 645.08 (1) states that, “words and phrases are construed according to rules of grammar and according to their common and approved usage....”

³⁰ *Tuma v. Comm'r of Econ. Sec.*, 386 N.W.2d 702, 706 (Minn. 1986); Minn. Stat. § 645.16 (1996).

geographic locations, not to people in a household making choices, but to unoccupied living quarters. Ordinary statutory interpretation is contrary to CenturyLink's argument.³¹

Further, the meaning to which CenturyLink agreed, the census definition of "household," is reasonable because the census definitions are used not only by the federal government, but are also widely and commonly used in Minnesota, by the Minnesota State Demographer, who in turn makes census data, and Minnesota projections based on census data, widely available to other Minnesota agencies and political subdivisions,³² and, according to the State Demographer, to generally, "inform policy-making and planning efforts at the State Capitol, state agencies and beyond."³³ And CenturyLink's own witness agreed that Census definition of "household" is appropriate for purposes of Minn. Stat. § 237.025,

because the definition fits neatly with the test set forth by the legislature in Minn. Stat. § 237.025 Subd. 4 . . . Census Bureau definitions are consistent with the approach dictated by the legislation. Census Bureau data on household units is publicly available and is widely used and generally accepted for academic, government and industry purposes. The Census Bureau is independent third party data that is also granular enough to be largely matched to CenturyLink's exchange boundaries.

Gullikson Aff. ¶ 28, Attach. 4 (CenturyLink Resp. to DOC IR No. 30). The Commission should reject CenturyLink's claim, that the term "households" in Minn. Stat. § 237.025, when referring to these four wire centers, does not mean people who "can choose voice service," but means instead "unoccupied real estate."

³¹ Minn. Stat. § 645.08 (1) states that, "words and phrases are construed according to rules of grammar and according to their common and approved usage...."

³² The annual population and "household estimates" are "used by Minnesota counties, cities and townships" and to "direct the flow of various state dollars, such as the Local Government Aid program." <http://mn.gov/admin/demography/data-by-topic/population-data/our-estimates/>

³³ <http://mn.gov/admin/demography/about/our-work/>

B. Use of the Term “Housing Unit” as Proposed By CenturyLink Would Understate the Percentage of CenturyLink-served Households By Unreasonably Inflating the Denominator of the Ratio, Without Evidence to Support the Inflation.

If the Commission used the term “housing unit” as proposed by CenturyLink in the four wire centers, the unoccupied housing quarters reported in the last census would be included in the count of “all households”, and would unreasonably reduce the percentage of CenturyLink-served households in the four wire centers.

In four wire centers, Mr. Lubeck’s first Affidavit proposes to redefine “household” to mean “housing unit,” and to employ a convoluted formula for dividing primary access lines by housing units in order to reduce the percentage of CenturyLink-served households below 50 percent. Mr. Lubeck argued that if there are more housing units than households in the four wire centers, there may be too many lines in the numerator and not enough households in the denominator. Mr. Lubeck stated, “[t]his anomaly can be corrected by removing the [CenturyLink] primary access lines that are not associated with a household from the numerator.” Lubeck Aff. ¶ 9. Rather than simply doing this,³⁴ however, Mr. Lubeck instead proposed an unreasonable allocation formula for estimating the number of non-household-occupied “housing units” served by CenturyLink. *Id.*

Mr. Lubeck’s formula is unreasonable because it erroneously assumes that in living quarters with no household – the summer homes, cabins, camping grounds, mobile homes, trailers, seasonal hunting and fishing shacks, and other such places where people “could live” temporarily-- subscriptions to CenturyLink primary access lines exist in the same proportion as “households” subscriptions to CenturyLink primary access lines. *Id.* In other words,

³⁴ This would entail, generally removing from the numerator the seasonally disconnected or suspended services.

CenturyLink proposes that the Commission determine that, in a wire center containing 100 households and 100 non-household-occupied seasonal living quarters in which CenturyLink sells 52 access lines, the Commission should infer that 26 primary access lines are in households and 26 primary access lines are in the summer homes, cabins, camp grounds, mobile homes, trailers, and seasonally-used shacks. CenturyLink provides no evidence to demonstrate the reasonableness of this allocation, which, in the view of the Department doesn't "pass the smell test." It is transparently more reasonable to assume that residents' households will have a greater percentage of primary access lines than will the occasional occupants of summer homes, cabins, camp grounds, mobile homes, trailers, and seasonally-used shacks. In the above example, for instance, it may be more reasonable to infer that the substantial majority of the 52 lines serve residents' households and that relatively few access lines are purchased to serve non-households.

Furthermore, Mr. Lubeck provides no quantitative data, but only loose conjecture to support his premise that a correction is needed to account for primary access lines serving "non-households." He proffers only a hypothetical situation:

If a customer lives in Minneapolis but also has a cabin in Tofte, the Census Bureau ...will count the Minneapolis home as a household, not the Tofte home, even though the Tofte home may have CenturyLink voice service working all year.

Lubeck Aff. ¶ 8. He loosely characterized the situation as one in which "customers subscribe to CenturyLink voice service for many of these dwellings" not occupied by a household, but Mr. Lubeck did not quantify whether "many" is a materially-significant number. There is no data in the record from which the Commission can reasonably estimate whether a material number of access lines are seasonally used by non-households in the four wire centers.

CenturyLink has the burden to demonstrate satisfaction of the 50 percent test, and has not done so. For these reasons, the Department recommends that the Commission not allow

CenturyLink to inflate the denominator of the ratio of CenturyLink served households to all households by defining “households” to mean “housing unit” in the four wire centers. The Commission should reject CenturyLink’s claim that in these wire centers the term “households” in Minn. Stat. § 237.025, refers, not to people who “can choose voice service,” but to housing units. The Department recommends that the Commission find that, in the four wire centers of Cook, Grand Marais, Tofte and Island Lake³⁵, CenturyLink did not satisfy the 50 percent test.

C. THE PETITION SHOULD NOT BE GRANTED WITH RESPECT TO EXCHANGES WHERE CENTURYLINK FAILED TO DEMONSTRATE SATISFACTION OF THE 60 PERCENT TEST OF MINN. STAT. § 237.025.

There are substantial flaws in CenturyLink’s Petition with respect to the supporting documents and the methodologies CenturyLink used to demonstrate it met the 60 percent test of Minn. Stat. § 237.025. When these flaws are accounted for, CenturyLink failed to meet its burden to establish the statutory requirements in numerous specific additional wire centers.

Further, in other wire centers, where the precise impact of CenturyLink’s flawed methodologies is not shown and cannot be determined for lack of supporting data, it is doubtful whether the criteria are met. Because of the flaws in CenturyLink’s methodologies, in wire centers where CenturyLink minimally appears to meet the statutory 60 percent test, the Commission should find that CenturyLink has failed to meet its burden of proof.

1. The Numerator of the 60 Percent Test Is Overstated In Exchanges Where CenturyLink’s Methods Inflated the Percentage of Households With Access to A Wireline CSP.

³⁵ Island Lake, as part of the Duluth exchange, does not need to be included, except that CenturyLink lists all its calculations by wire center rather than by exchange.

To succeed on the Petition, CenturyLink must demonstrate to the Commission's satisfaction that more than 60 percent of the households in each of its exchanges can choose voice service from a CSP.

But...what exactly is a CSP? With respect to the wireline service discussed in this section, a CSP is defined in Minn. Stat. § 237.025 subd. 1 (a) (2) to mean: “any other provider...who owns...the last-mile or loop facilities delivering *service to a majority of households* in an exchange service area.” CenturyLink presented no data from which the Commission can determine that any of the cable and other wireline companies to which CenturyLink points actually own facilities delivering service to more than half (i.e., “a majority”) of households in each exchange in the Petition.³⁶

Despite this lack of actual information on CSPs competing in CenturyLink exchanges, CenturyLink proceeded with its Petition, using instead two data sets as inputs and a problematic model. CenturyLink's model for “wireline” situations uses two data inputs: (1) census data on Minnesota households and (2) the FCC's public data on “unserved” census blocks³⁷ and a methodology for associating these two data sets to CenturyLink exchanges. Mr. Lubeck used what he called the “centroid” method to assign Minnesota census blocks and their associated households to CenturyLink exchanges. When a census block straddles two or more exchanges, the centroid method assigned the block to one exchange. Lubeck Aff. ¶ 6 fn.5. To establish households served by a competitor in each exchange, the model used the FCC data set listing

³⁶ Brigham Aff., p. 8, ¶ 12 (Mr Brigham conceded that, “CenturyLink does not have data that shows the exact locations of all households that are passed by, and can order voice service from, cable providers in each exchange service area.”)

³⁷ Facilities-based broadband providers are required to file data with the FCC twice a year (Form 477) on where they offer Internet access service at speeds exceeding 200 kbps in at least one direction. <https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477>

unserved census blocks to ¹⁰ identify each census block that was *not* unserved (i.e. “served,”) meaning that one household in that census block can receive broadband from a cable company or other wireline broadband provider.³⁸

Next, --and this is where the model became problematic-- the model assumed that wherever one household in a census block is served by a broadband provider, all households in that census block could receive voice service from a broadband provider.³⁹ Finally, the model totaled these “broadband-served” households in each exchange, and divided that number by the total households in all census blocks assigned to the exchange, to calculate the ratio of broadband-served households to total households in the exchange.

From this, CenturyLink concluded that the condition, that “at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated service provider has been met in 130 of Century QC’s wire centers in Minnesota.” Lubeck Aff. ¶ 18. Because CenturyLink has 154 wire centers in Minnesota, Mr. Lubeck’s math calculation means that 24 wire centers did not meet, by CenturyLink’s standards, the sixty percent statutory criterion as to wireline service. Gullikson Aff. ¶ 41.

CenturyLink’s model is significantly flawed in four respects.

First, Minn. Stat. § 237.025 subd. 1 (a) (2) defines the CSP as, “any other provider...who owns... “a substantial proportion of the last-mile or loop facilities *delivering service to a majority of households* in an exchange service area.” CenturyLink’s method for identifying

³⁸ The Department served an IR that asked what FCC Form 477 data CenturyLink used to create the exhibits that CenturyLink states supports the households served by cable and other wireline. CenturyLink responded that the same underlying data was used for both cable and other wireline services.

³⁹ Mr. Lubeck assumed that “[i]f the FCC data shows that cable broadband service is available in a census block, all of the households in the census block are considered to have the option of ordering voice service from a cable provider.” Lubeck Aff., p. 11, fn. 14.

wireline CSP-served households is inconsistent with this statutory definition. CenturyLink has presented no data from which the Commission can determine that each of the competitors to which CenturyLink points actually owns facilities delivering service to more than half (i.e., “a majority”) of the households in each exchange at issue.

Second, CenturyLink’s assumption that 60 percent of households can choose voice service is unsupported and plainly in error. The FCC’s Form 477 data does not, by itself, demonstrate availability of service to all households in a census block. The FCC’s public Form 477 data, which distinguishes “unserved” census blocks (where no household can receive broadband service) from “served” census blocks (where one household in the block can receive broadband service) does not support an inference that all households in a “served” census block can receive broadband internet access service from that provider. Gullikson Aff. ¶ 42-43. Yet, the CenturyLink model relies on the accuracy of this assumption.

Third, CenturyLink provided no support to show that a provider that offers broadband internet access service necessarily offers voice service. *Id.*

A. CenturyLink Did Not Identify Wireline CSP-Served Households Inconsistent With Minn. Stat. § 237.025 subd. 1 (a)(2).

CenturyLink has failed to show that 60 percent of households in each of its exchanges can choose voice service from a CSP, because CenturyLink appears to have disregarded the statutory requirement that a cable or broadband provider, to be deemed a CSP under Minn. Stat. § 237.025 subd. 1 (a) (2), must own “a substantial proportion of the last-mile or loop facilities delivering *service to a majority of households* in an exchange service area.”

CenturyLink has presented no data from which the Commission can determine that the competitors to which CenturyLink points actually own facilities delivering service to more than

half (i.e., "a majority") of households in each exchange in the Petition. CenturyLink has attempted to circumvent this statutory requirement in two ways.

First, instead of presenting data to show that a competitor in each CenturyLink exchange is a CSP (that is, that each competitor has a network that reaches over half the households in each exchange), CenturyLink invites the Commission to infer that all households in a "not-unserved" census block can receive service. The Commission should decline the invitation.

Second, to be deemed to be a CSP, the statute requires that a competitor must serve the mandatory "majority" of households in each exchange. CenturyLink's method fails because CenturyLink *aggregated* providers to reach the 60 percent target. That is, none of CenturyLink's data about competitors serving one household per census block identifies the competitor. From CenturyLink's data, one can only determine that one or more of competitors serve these households. It *could* be one competitor, but it could just as easily be two or ten. CenturyLink's Petition provides only lists of competitors per exchange, and made no effort to identify market shares of the various competitors.

B. The Availability of Broadband Service to One Household In a Census Block Does Not Demonstrate Availability of Broadband to All Households In That Census Block.

CenturyLink relied solely on Form 477 data, which identifies census blocks where wireline competitors provide broadband internet access service to one household in the census block, to support its proposed inference that the 60 percent criterion of Minn. Stat. § 237.025 is

satisfied. Lubeck Aff. p. 10, fn. 13.⁴⁰ CenturyLink presented no evidence, however to show the reasonableness of this inference.⁴¹

In response to the Department's assessment that the CenturyLink Petition was inadequately supported (Gullikson Aff. ¶ 44-50) Mr. Lubeck's sole rejoinder was a retort that, because "the FCC determined that this data is the best data available to make decisions on how to allocate billions of dollars of CAF II support nationwide, CenturyLink determined that the FCC's data was the best source to use in determining where 60% of households had access to a competitive alternative." Lubeck 2nd Aff. ¶ 24. Making this glib statement instead of providing facts did not aide CenturyLink's cause.

1. FCC Form 477 Public Data Is Intended to Identify Unserved Census Blocks, Not, As CenturyLink Proposes, to Identify Partially-Served Census Blocks.

A key goal of the FCC is to accelerate the deployment of broadband to unserved areas,⁴² and Form 477 data is collected to further that goal. Established in 2000, the Form 477 program is the Commission's primary tool for collecting data about broadband and local telephone networks and services. Moreover, the program was modified to focus on unserved areas in 2008, when Congress enacted the Broadband Data Improvement Act (BDIA), which required the FCC to compile "demographic information for unserved areas" and specifically required that the FCC

⁴⁰ See <https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477> which is the link Mr. Lubeck provides in fn. 13 on p. 10 of his Affidavit.

⁴¹ The effect of the erroneous inference is to inflate the numerator of the ratio of CSP-served households to all households.

⁴² *Modernizing the FCC Form 477 Data Program*, WC Docket Nos. 07-38, 09-190, 10-132, 11-10; FCC 11-14, 76 Fed.Reg. 10827 to 10852, Feb. 28, 2011 at ¶ 24.

compile lists “of geographical areas not served by any provider of advanced telecommunications capability.”⁴³

The FCC is highly transparent about the limitations of the Form 477 data it collects, and cautions that the data allows only limited assessments of broadband deployment and availability, because “deployment is overstated when households subscribe in one part of an area ... but service is not offered to households in other parts of the same area.”⁴⁴ The FCC specifically warns against using Form 477 data as CenturyLink here proposes to use it:

Fixed providers⁴⁵ file lists of census blocks in which they can or do offer service to at least one location, with additional information about the service.* *Note: A provider that reports deployment of a particular technology and bandwidth in a census block *may not necessarily offer that service everywhere in the block*. Accordingly, a list of providers deployed in a census block *does not necessarily reflect the number of choices available to any particular household or business location in that block*, and the number of such providers in the census block does not purport to measure competition.⁴⁶

Mr. Lubeck’s casual rejoinder to the effect that Form 477 data should be “good enough” for the Minnesota Commission if it’s good enough for the FCC’s use in connection with distribution of CAF II funding provides no support for CenturyLink’s Petition. The CAF II program resulted from the FCC’s unanimous conclusion in 2011 that extending broadband service to communities that lacked any service was one of its core reform objectives; established

⁴³ Id. at ¶¶ 12-13.

⁴⁴ Id. at ¶ 33.

⁴⁵ The term “fixed providers” includes both cable and other wireline providers.

⁴⁶ Gullikson Aff. ¶ 44 and Attach. 7 (Fixed Broadband Deployment Data), pp. 1 and 6. *See also* <https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477>

under the *USF/ICC Transformation Order*,⁴⁷ the CAF program provides subsidies to certain incumbent providers operating in areas *unserved* by any broadband provider. Phase II of the FCC’s Connect America Fund program (“CAF II”) was designed to disburse billions of dollars in subsidies over five years to price cap incumbent local exchange carriers (“ILECs”) like CenturyLink that agreed to deploy broadband-capable networks to *unserved* areas the FCC identified.⁴⁸ “Unserved” status referred to census blocks where broadband internet access service⁴⁹ was unavailable to any household in the census block from an unsubsidized competitor. Indeed, the FCC specifically does not concern itself with lack of broadband access service to geographic areas below the census block level; it instructs challengers to an “unserved” designation that, where a census block is shown as served, but the existing provider only serves a portion of the census block, the FCC: “will not consider challenges below the census block level (i.e., partial census block challenges). Given the number of census blocks involved in Phase II, the [FCC] does not have the resources to address sub-census block level challenges.”⁵⁰

⁴⁷ Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and FNPR, 26 FCC Rcd 17663 (2011) (*USF/ICC Transformation Order*); *aff’d sub nom.*, In re: FCC 11-161, 753 F.3d 1015 (10th Cir. 2014).

⁴⁸ CenturyLink is eligible for substantial amounts in CAF II funds for Minnesota and received over \$54 million for Minnesota in 2015. Gullikson Aff. ¶ 61. Under terms of the subsidy program, CenturyLink must build out new wireline broadband to 114,739 homes and businesses; providing service to 40 percent of funded locations by the end 2017, 60 percent by the end of 2018, 80 percent by the end of 2019, and 100 percent by the end of 2020. *Id.*

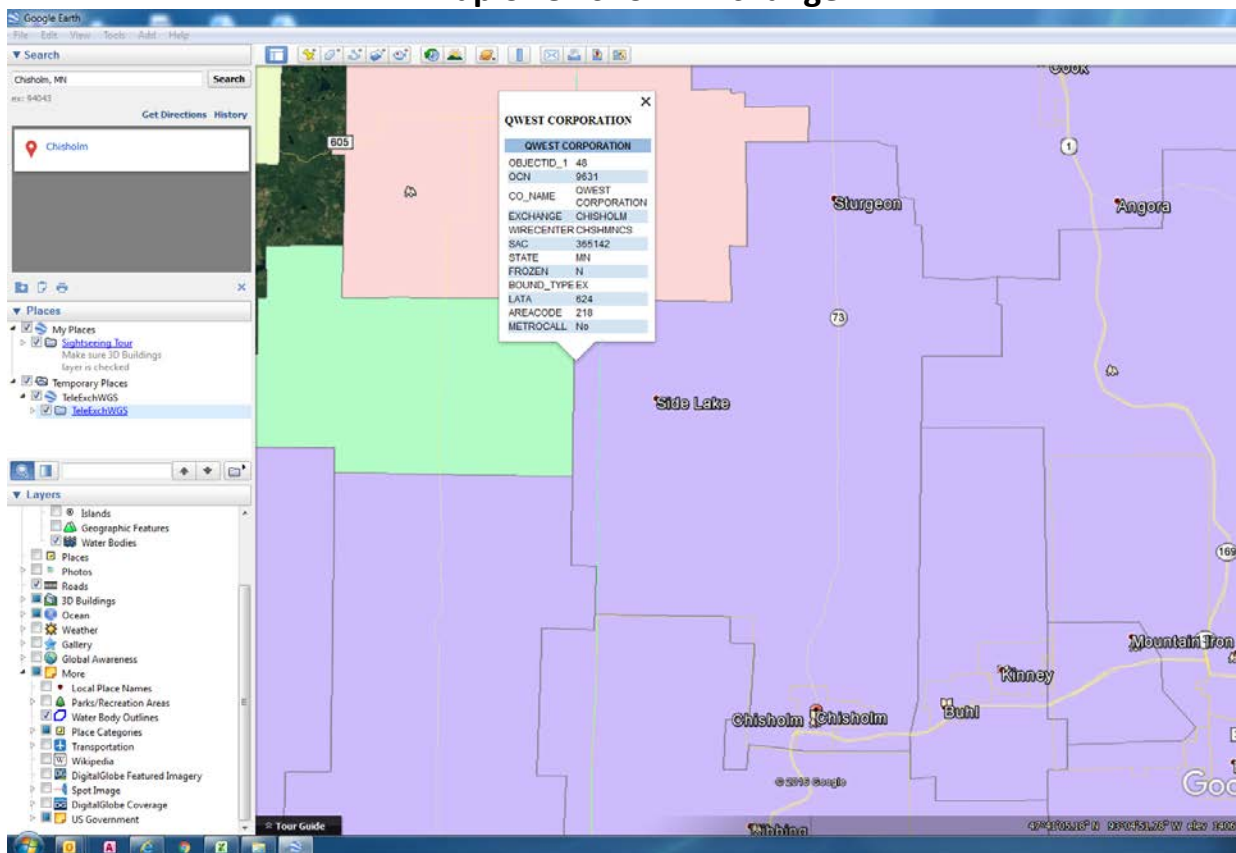
⁴⁹ Broadband internet access service was defined at the time to require at least 4 Mbps download and 1 Mbps upload speeds.

⁵⁰ *A Basic Guide to the Connect America Phase II Challenge Process*, (rev’d July 31, 2014) p. 9, publ. at https://www.fcc.gov/wcb/tapd/Challenge_Process/ChallengeProcessGuide7-31-14.docx

Indeed, Mr. Lubeck’s mistaken understanding of Form 477 data appears to be based on a common propositional fallacy known as “denying the antecedent” (if A, then B; not A, therefore not B.) It is simply incorrect for Mr. Lubeck to opine that the Form 477 data, which shows a census block to be unserved when no households are served, can be used to demonstrate that when one household is served, then all the households in the census block can be deemed served, and that the households in that census block can choose that CSP.

To illustrate the extreme distortion created by CenturyLink’s erroneous assumption, attached hereto as Attachment A is a copy of census data Mr. Lubeck provided for the Chisholm exchange, which CenturyLink claims to be one in which 60 percent of households can choose a CSP.

Map of Chisholm Exchange



Source: CenturyLink Resp. to DOC IR. No. 82, Attach 82A (CenturyLink Map Layers)

The exchange is mostly rural, but there are three towns in the exchange, Sturgeon, Side Lake and Chisholm. Attachment A shows that there are 2728 households in the exchange. 2303 of the households are located in 208 “served” census blocks – that is, in a block in which one household per block can be served by a cable provider. 761 households are located in 425 “unserved” census blocks—blocks with no competitor. With this data, CenturyLink demonstrated that 208 of the 2728 households in the exchange (or 7.6 percent) have access to cable. It is unknown whether the other 2520 households in the exchange (92.4 percent) can access any alternative voice provider, and CenturyLink has provided no information from which the Commission might infer or even estimate how many of the 2520 households might be able to obtain competitive service.

Experience teaches us that it is reasonable to generally assume that homes in denser areas, nearer to a town’s center are more likely to have access, but there is no data in the Petition to help the Commission count the households in the Chisholm exchange or any other exchange with *actual* access to competitive voice service. There is no data from which one can even estimate where to draw the line. CenturyLink has left us with guesswork.

2. CenturyLink Knows It Is Proposing That the Commission Mis-Apply Form 477 Data.

As Ms. Gullikson demonstrated in her Affidavit, CenturyLink is well aware that Form 477 data cannot be used in the manner it proposed here. Gullikson Affidavit Attachment 8 is a record of a 2015 complaint to the Department by a resident of rural Brainerd who lacked, but wanted, CenturyLink broadband internet access service, and who pointed to the broadband service area map (as re-published by the Minnesota Department of Economic Development (DEED)) as proof that CenturyLink broadband internet access service should be available to his

household. CenturyLink responded to the Department’s inquiry by advising that the DEED broadband map, constructed from public Form 477 data, cannot be relied on to determine whether broadband access is available to a particular location “because the FCC broadband map counts an area as ‘served’ if at least one customer in a census block is served.”⁵¹ Gullikson Aff. ¶ 45. That is, CenturyLink relies of this attribute of the Form 477 data for its own business purposes, to demonstrate that households lack access to broadband service within the so-called “served” census blocks, while inconsistently here urging the Commission to rely on the same public FCC Form 477 data to determine coverage. Gullikson Aff. ¶ 46.

3. CenturyLink failed to supply work papers or other data to support its methodology.

To compound its error, Lubeck Affidavit Exhibits AL-4, AL-5, AL-7, AL-8, AL-9 and AL-10 all purport to show that 60 percent of households can choose cable or other wireline voice options, but CenturyLink provided no work papers or other support, and did not explain the methodology and assumptions to make its conclusions beyond what has been discussed above. Gullikson Aff. ¶ 47.

To illustrate, the Department served discovery on CenturyLink in an attempt to verify how CenturyLink reached its conclusions that all households in a census block receive voice service if one household in the census block receives voice service. For example, DOC IR No. 35 asked CenturyLink “[if] a cable company is offering broadband/voice service to just one

⁵¹ Gullikson Aff. Attach. 8. (CenturyLink Response to Citizen Complaint) (CenturyLink stated: “CenturyLink only offers voice service to [Customer identity redacted] address. The broadband map that [Customer identity redacted] viewed shows his area as having broadband available because the FCC broadband map counts an area as ‘served’ if at least one customer in a census block is served. Customers to the South and West of the property receive broadband due to a past build made with stimulus funds. It is possible that future builds pursuant to state and federal programs might result in some level of broadband service being available at this location. However, right now, CenturyLink does not offer such service.)

household in a census block, did CenturyLink include all of the households within the census block as having voice service available from the cable company”? While the question seemed straight forward, CenturyLink’s response was not. CenturyLink did not state whether CenturyLink did or did not include all of the households in the census block, but instead, responded: “[t]he FCC data is provided at the census block level. CenturyLink is not aware of a situation in which a cable company would offer service to a single household within a census block. CenturyLink included every census block where the cable company reported to the FCC that it was competing for services in that census block.” Gullikson Aff. ¶ 48 Attach. 9 (CenturyLink Resp. to DOC IR No. 35).

Similarly, in DOC IR No. 38 the Department provided the FCC’s warning advising against misuse of FCC Form 477, as published on the FCC website⁵² discussed above:

“A provider that reports deployment of a particular technology and bandwidth in a census block may not necessarily offer that service everywhere in the block. Accordingly, a list of providers deployed in a census block does not necessarily reflect the number of choices available to any particular household or business location in that block, and the number of such providers in the census block does not purport to measure competition.”

and asked CenturyLink to admit that (a) if a provider reports it offers a particular technology or bandwidth in a census block that it may not offer that service everywhere in the census block, and to admit that (b) the number of such providers does not purport to measure competition. Gullikson Aff. ¶ 49, Attach. 10 (CenturyLink Resp. to DOC IR No. 38 A). CenturyLink denied both requests for admission, and stated: “CenturyLink contends that the FCC data is the best publicly-available data relevant to the criteria set forth in Minn. Stat. § 237.025, subd. 4. More specific information would need to be requested from the providers themselves and is not

⁵² <https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477>

available to CenturyLink.” Gullikson Aff. ¶ 49, Attach. 10 (CenturyLink Resp. to DOC IR No. 38 C and D).

In DOC IR No. 38, the Department asked whether CenturyLink can provide the number and percentage of households in each census block that CenturyLink knows are subject to offers of service by a CSP. Instead of answering the request, CenturyLink asserted: “CenturyLink relies on the FCC data as the best data publically available. CenturyLink is not aware of any data source that would provide conclusive data as to offerings by competitive service provider on a household-by-household basis.” Gullikson Aff. ¶ 50.

The Department concluded that CenturyLink’s proposed assumption, that all households in a census block have broadband available if one household in the census block has broadband available, overstates the number of households that have broadband service available. Gullikson Aff. ¶ 51. CenturyLink has not demonstrated that more than 60 percent of the households in these exchanges can choose voice service from a CSP.

C. CenturyLink Erroneously Assumes That All Wireline Broadband Providers Offer Competitive Voice Service.

Mr. Lubeck’s Affidavit bluntly asserts that the “availability of broadband services, [] can be used to measure the availability of voice services, because today, where cable companies offer broadband services, they also offer voice services utilizing broadband technologies.” Lubeck Aff. ¶ 15. This assumption is not supported by the facts. Gullikson Aff. ¶ 52.

The Department asked CenturyLink to provide support for this claim in DOC IR No. 36 Gullikson Aff. Attach. 11. CenturyLink responded: “...CenturyLink reviewed the website of each of the competitive providers noted in Attachment AL-8, and each offers voice services.” Gullikson Aff. ¶ 53. While the Department does not dispute that each provider listed in AL-8 likely offers voice service in some area, the relevant question is whether the provider is a CSP

that offers voice service in each of the specific exchanges for which CenturyLink is petitioning. Because CenturyLink has the burden of proof, the Department expected CenturyLink would have verified its facts as accurate. Since CenturyLink did not do so, the Department sent a DOC IR to each of the twelve companies listed in Lubeck Exhibit AL-5 that CenturyLink claims are cable companies that meet the definition of a CSP. The DOC IRs sought to confirm the assumption proposed by Mr. Lubeck in his Affidavit, at ¶ 15. Gullikson Aff. ¶ 54.

Several cable providers stated that they did offer voice contemporaneously with broadband; however, one cable provider said it did not provide voice service at any location where it provided broadband services, and two said they offered voice service in some areas but not all. Gullikson Aff. ¶ 55 and Attach. 12, (Cable Providers Resp. to DOC IR 1).⁵³

In his Second Affidavit, Mr. Lubeck attempted to rebut Ms. Gullikson's analysis showing that CenturyLink was incorrect in asserting that "where cable companies offer broadband services, they also offer voice services utilizing broadband technologies." He acknowledged that one company offered voice not utilizing broadband technologies. He pointed out that a second company failed to provide voice service, but noted that this occurred outside CenturyLink's service areas. Lubeck Second Aff. ¶ 27. What is most troubling, however, is Mr. Lubeck's statement that the failure of three other competitors to offer voice service does not change his analysis because a third cable company was "in those wire centers." *Id.* As discussed at length in the preceding section of this initial brief, CenturyLink's characterization of what it means for a competitor to be a CSP that provides service "in a wire center" means only that one household in one census block is served by a broadband provider. CenturyLink's bare assertion that another

⁵³ Yet another responded that it offered voice service, but not through a VoIP platform, which is in conflict with Mr. Lubeck's erroneous claim that not only do cable companies always offer voice service, they do so using VoIP technology. Lubeck Aff. ¶ 15.

company is “in the wire center” is not sufficient to demonstrate that sixty percent of households in each exchange can choose voice service from a CSP.

CenturyLink overstated the number of households served by alternative providers by its assumption that all households with a non-CenturyLink broadband internet access service provider can also receive voice service from that provider. Gullikson Aff. ¶ 56.

In light of the erroneous assumptions CenturyLink used in its effort to demonstrate that it has satisfied the 60 percent test, it is reasonable to find that in exchanges where CenturyLink data shows it narrowly meets the test based on cable and other wireline voice service, CenturyLink has not satisfied its burden of proof. Gullikson Aff. ¶ 57.

D. Some of the Identified Wireline Competitors Do Not to Provide The Same Minimum Services Provided by CenturyLink.

Public interests goals to be considered by the Commission in its oversight of telecommunications include supporting universal service, maintaining just and reasonable rates, and ensuring consumer protections are maintained in the transition to a competitive market for local telecommunications service. Minn. Stat. § 237.011. Public interests required by law and rule to be protected include, at minimum, preserving the state's commitment to universal service (Minn. Stat. §§ 237.16 subd. 1 (a) (2); 237.16 subd. 8 (a) (8)) and affordable rates (Minn. Stats. §§ 237.16 subd. 1 (b) and subd. 8 (a) (8)).

In this case, CenturyLink has made no showing that any CSP offers TAP and Lifeline. The below Table 1 lists the companies identified in Lubeck Affidavit, Exhibit AL-5 as “cable voice” providers. Three of the companies listed have no certificate of authority to provide telephone service in Minnesota.

TABLE 1

Cable Voice from Exhibit AL-5	TAP Report	# TAP Customers	ETC		
Access Media 3	no		No		
Benton Cablevision Inc.	no		No	No Certificate of Authority	
Charter Communications, Inc.	no		No		
Comcast	yes	0	No		
Hiawatha Broadband Communications	yes	82	No		
Mainstreet Communications	yes	41	No		
Mediacom Minnesota LLC	no		No		
Midcontinent Communications	yes	300	Yes		
Milaca Local Link	yes	56	No		
Savage Communications, Inc.	no		No	No Certificate of Authority	
Sjobergs Inc.	no		No	No Certificate of Authority	
Tekstar	yes	240	No		

The Commission may take notice of the TAP Reports filed in MPUC Docket No. 16-1, which shows that, of the twelve companies listed in Lubeck Affidavit Exhibit AL-5, only six companies filed TAP Reports. And Comcast, which filed a TAP Report, states in its Report that it does not provide TAP to a single customer. Thus, only five of the twelve companies provide the TAP program to customers.

The Commission may also take notice of its September 30, 2016 Order in MPUC Docket No. 16-8, where it certified ETCs use of federal funds. Of the twelve companies in Lubeck Affidavit Exhibit AL-5, only one company, Midcontinent Communications (Midcontinent), was certified as an eligible telecommunications carrier (ETC). Thus, of the twelve companies, only Midcontinent can provide customers with the \$9.25 monthly Lifeline credit.

Further, CenturyLink has made no showing that any voice service that it claims constitutes a CSP offers affordable voice service. In many exchanges, prices of the CSPs are very substantially greater than CenturyLink voice service. The following is a screenshot

showing that in the Chisholm exchange, for example, the price for voice service from Mediacom, is \$60 per month, which is an approximately 350 percent rate hike compared to the \$ 17 per month CenturyLink price for unlimited local service.⁵⁴

This is a transcript of a chat conversation on 3/8/2017 4:00 PM(UTC).

257388 joined the conversation.

Mediacom Chat: Hello, welcome to Mediacom chat.

How can I help you?

257388: What is the monthly cost for a phone line at 201 West Lake Street, Chisholm, Minnesota 55719?

Mediacom Chat: This link will provide you with pricing information:

<http://www.mediacomcable.com/site/order.php>

Mediacom Chat: Is there anything else I can help you with?

257388: Having the link is nice, for, right now, I am just trying to price out a phone line. I will look into the other service options later. My address is 201 West Lake Street, Chisholm, Minnesota 55719.

Mediacom Chat: I will connect you with a live agent who can help you. Please wait.

Katrina joined the conversation.

Katrina: Hello

Katrina: **49.95 + 10.00 modem rental fee + taxes**

257388: Thanks. Katrina. That prices doesn't include Internet or TV does it? Do I pay extra for long distance? Are there extra fees added in?

Katrina: That is correct that is the standard rate for service.

Katrina: We only have one phone plan that does cover unlimited local and long distance calling.

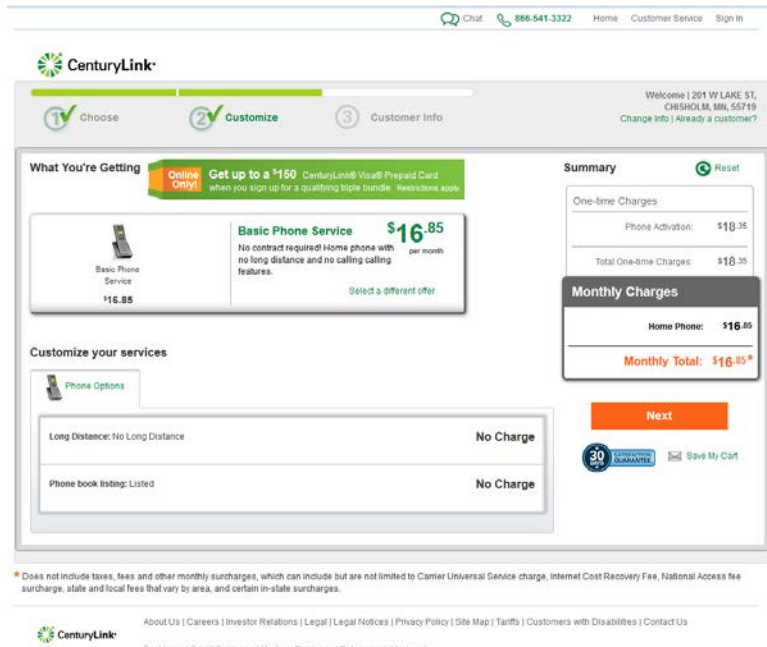
257388: Great. I will have to get back to you on this later.

Katrina: No problem, is there anything else I can do for you today?

257388: No.

Katrina: Have a great day!

⁵⁴ In MPUC Docket No. 15-1033, Department Witness Mr. Heinen studied the Commission's history of residential customer rate increases and its practice of mitigating "rate shock." His August 16, 2016 Direct Testimony at pages 14-15, Table 4 reviewed all of the Commission's electric rate cases, (save Northwest Wisconsin Electric Company) over the past 20 years. He reported that the largest percentage increase to any residential customer charge approved by the Commission was the 60 percent increase approved in the 2008 Minnesota Power general rate case. That increase came after a 14 year period between rate cases. The average increase approved by the Commission for residential customers was approximately \$0.69 and average percentage increase of approximately 16.35 percent.



The Mediacom offering is bundled with unlimited nationwide calling, and local-only calling is unavailable. CenturyLink has presented no information to demonstrate that prices in this range constitute affordable service within the meaning of Minn. Stats. §§ 237.011 and 237.16 subd. 1 (b) and subd. 8 (a) (8)).

As stated above, there are substantial flaws in CenturyLink’s Petition with respect to the supporting documents and the methodologies CenturyLink used to demonstrate it met the 60 percent test of Minn. Stat. § 237.025. Although the availability of TAP and Lifeline, and the ability to purchase a competitive service at a comparable rate as a stand-alone service are not specifically listed in the criteria to determine whether CenturyLink’s petition should be granted, the Commission can ensure that CenturyLink has fully met its burden with the specified statutory criteria. Because of the flaws in CenturyLink’s methods, in wire centers where CenturyLink minimally appears to meet the statutory 60 percent test, the Commission should find that CenturyLink has failed to meet its burden of proof.

2. The Numerator of the Sixty Percent Test Is Overstated in Certain Exchanges Where CenturyLink’s Wireless Study Shows Households Cannot Choose Wireless Voice Service of Minimally Adequate Quality.

A. CenturyLink Inflated the Number of Households That Can Choose Wireless Service by Including Households That Do Not Have Adequate Indoor Call Quality.

With reference to maps of wireless companies’ “coverage” he offered, Mr. Brigham’s Affidavit observed that it appeared that, “[a]t least two wireless carriers have complete coverage for all but a few exchange service areas in the state.” Brigham Aff. ¶ 10. The maps attached to the Brigham Affidavit appear to have been marketing maps downloaded or printed from the public internet. Gullikson Aff. ¶ 64.

Mr. Brigham conceded that his maps showed that the Silver Bay, Tofte, Grand Marais, Wabasha and Sandstone exchanges had only partial coverage. Brigham Aff. ¶ 10. Gullikson Aff. ¶ 65. Noting the Department’s objections to reliance on wireless companies’ internet advertising maps, the Commission previously determined that:

The maps are not, on their face, sufficient to withstand an initial level of scrutiny for analyzing whether the company meets the statutory criteria. And there is no other information in the record, such as engineering testimony or other expert testimony, explaining the availability or adequacy of the wireless coverage areas shown on the maps. Furthermore, there are no Affidavits, or other sworn statements, from wireless companies identifying the percentage of households, by exchange service area, that can choose voice service from an unaffiliated competitive service provider.⁵⁵

On November 21, 2016, CenturyLink supplemented its Petition with the Affidavit of Adam Nelson who conducted an “Assessment of Wireless Voice Coverage in Select

⁵⁵ *In the Matter of the Petition of CenturyLink QC to be Regulated Pursuant to Minn. Stat. § 237.025: Competitive Market Regulation*, Docket No. P-421/AM-16-496, Order Requiring Further Filings And Initiating Expedited Proceeding, (November 2, 2016).

CenturyLink Wire Centers in the State of Minnesota” and opined about the availability of “indoor” and “outdoor” coverage. Gullikson Aff. ¶ 66.

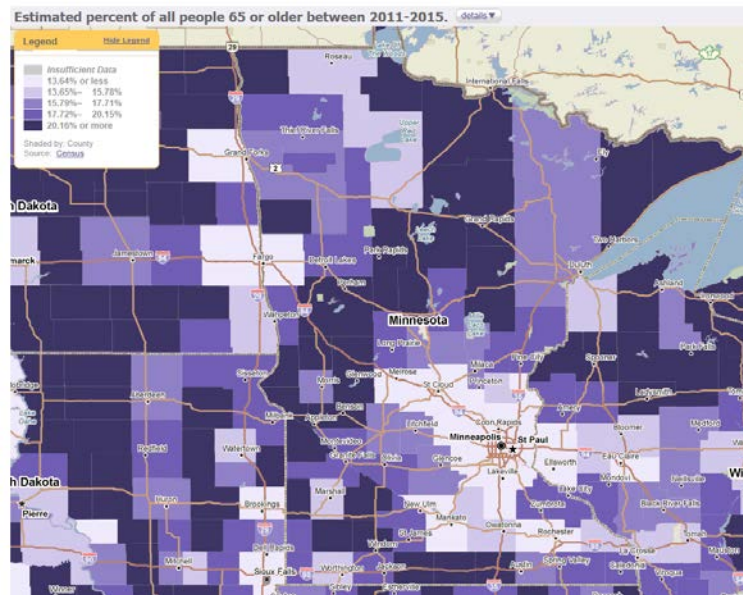
Mr. Nelson’s study was examined by the Department’s engineering expert, Mr. Wes Legursky. Mr. Nelson examined 32 wire centers that were provided to him by CenturyLink. According to Mr. Lubeck, “CenturyLink retained Federal Engineering, Inc. (“FE”) to perform an independent engineering analysis of wireless voice coverage in 32 of the more rural CenturyLink QC wire centers in Minnesota. These 32 wire centers include all of the 24 wire centers not meeting the 60 percent criteria” as to cable and other wireline service. Lubeck Aff., p. 17, ¶ 24; Gullikson Aff. ¶ 67.

For several reasons, the Commission should conclude that *indoor* signal strength is the appropriate measure of whether a household can choose wireless as a CSP’s competitive voice service. First, as Ms. Gullikson observed, Minn. Stat. § 237.025, subd. 4 (1) on its face refers to residents of ‘households,’ being able to choose voice service; it does not refer to geographic areas adjacent to or surrounding those households. Gullikson Aff. ¶ 69.

Second, in weighing a petition with respect to claimed wireless CSPs, a public interest required by law and rule to be protected includes, at minimum, maintaining the existing quality of service. Minn. Stat. § 237.011. Further, Minn. Stat. § 237.025 subd. 8 (a)) requires that if a petition is granted, subscribers continue to have access to “voice-grade service.” Minn. Stat. § 237.16 subd. 8(a) (9) requires Commission to prescribe standards for quality of service and Minn. Rule 7810.5500 requires telephone utilities to “provide satisfactory transmission ... at adequate volume levels and free of excessive distortion” and “noise and cross talk” that do not “impair communications.”

Third, the Legislature has specified that the telecommunications services to be protected as part of “universal service” include, “*at a minimum,*” access to the “statewide telecommunications relay service [TRS] for people with hearing loss⁵⁶.” Minn. Stat. § 237.16 subd. 9. TRS must allow an individual with a communication disability to use telecommunications services in a manner *that is functionally equivalent to the ability of an individual who does not have a communication disability.* Minn. Stat. § 237.50 subd. 11. CenturyLink has not demonstrated that a CSP’s service is functionally equivalent if disabled citizens are only able to place calls outside of their home.

Fourth, below is a map of the Minnesota State Demographer⁵⁷ that compares the percentages of residents over 65 years of age in rural areas of the State with the more urban areas (including St. Cloud, Mankato, the Twin Cities, Fargo/Moorhead and Rochester).



From: <http://mn.gov/admin/demography/map-viz-gallery/map-percent-65-or-older.jsp>

⁵⁶ Protected telecommunications relay services (TRS) are the telecommunications transmission services required under Federal Communications Commission (FCC) regulations at 47 CFR pts. 64.604 to 64.606.

⁵⁷ The Commission may take notice of this public data, published by the Minnesota State Demographer at <http://mn.gov/admin/demography/map-viz-gallery/map-percent-65-or-older.jsp>

These public records show that in many exchanges in greater Minnesota, household residents are disproportionately elderly, when compared to Minnesota's more urban areas. Similar to its demonstration for disabled Minnesotans, CenturyLink has not demonstrated that elderly residents "can choose a CSP's competitive voice service" if the only access to such service requires the resident to place and/or receive calls outside of their home.

The Department recommends, based upon Mr. Nelson's testimony, as further explained by Mr. Legursky, that it is reasonable for the Commission to conclude that *indoor* signal strength is the appropriate measure of whether a household can choose wireless as a competitive service, Legursky Aff., pp. 5-6. Gullikson Aff. ¶ 68. Ms. Gullikson explained, "whether a household can choose wireless as a reasonable competitive service alternative, particularly with respect to critical safety services such as 911, should not require that the customer go outside their home or climb to higher elevations to obtain service. Gullikson Aff. ¶ 69.

Based on Mr. Nelson's and Mr. Legursky's analysis of the availability of indoor coverage, CenturyLink failed to demonstrate that the Cook, Holdingford, Biwabik, Sabin, and Staples exchanges satisfy the statutory requirement that 60 percent of households can choose voice service from a wireless service provider, as is detailed in the Gullikson Affidavit, Attachment 6, Column J. Gullikson Aff. ¶ 70. The Department recommends that the Commission find that CenturyLink failed to demonstrate that consumers can choose competitive wireless service from a CSP in these exchanges.

B. The Modeling Provided By Mr. Nelson Should Be Viewed As An Upper Bound.

Mr. Nelson attempted to refute Mr. Legursky's conclusion that the modeling done by Mr. Nelson should be viewed as an upper bound. Mr. Nelson stated that 25 dB loss variable for

forestland⁵⁸, like the 10 Db loss for inside buildings, is conservative⁵⁹ without explaining how the values were determined. Further, Mr. Nelson failed to explain whether this model is intended for designing a commercial wireless network, or for purposes of determining whether there is an adequate wireless service provider to the household, such that 911 service can be relied upon.

Mr. Nelson also stated that his analysis looked solely at one of 15 frequency bands licensed by Verizon and/or AT&T in the State of Minnesota. Mr. Nelson offered no analysis for this claim or that the other frequencies are even sufficient to provide a signal. Mr. Nelson goes on to observe that other companies offer service in these areas using different frequency bands as well (for example Sprint and T-Mobile), but did no analysis for any other company or frequency band to support any inference that if these companies' services were analyzed, it could have impacted his conclusions.

Mr. Legursky recommended that the modeling used by Mr. Nelson be viewed as an upper bound since no explanation was provided for selection of model inputs and whether the very purpose of the model is consistent with the purpose of the Commission in this proceeding has not been explained. Again, the methods and estimates used to determine whether 60 percent of the households can choose indoor service is imperfect so it is reasonable for the Commission to find that CenturyLink has not met its burden for the four exchanges that simply fail the test. Further, based on Mr. Nelson's and Mr. Legursky's analysis of the availability of indoor coverage, the exchanges of Isanti, Nashwauk, and Marble show only marginally more than 60 percent of households can choose indoor wireless service, with reported indoor coverage of 68, 63 and 63 percent respectively, as shown on Gullikson Affidavit, Attachment 6, Column J. Gullikson Aff.

⁵⁸ Nelson Second Aff. ¶ 5.

⁵⁹ Nelson Aff., Exh. 2, p. 21 of 23.

¶ 70. Since the methods and estimates used to determine whether 60 percent of the households can choose indoor service are imperfect, it would be reasonable for the Commission to find that CenturyLink has not met its burden for these three exchanges that are *estimated* to marginally satisfy the statutory criteria.

3. The Denominator of the Sixty Percent Ratio Is Understated In the Comstock and Nashwauk Exchanges, Where CenturyLink Switched To A Different Methodology to Assign Census Blocks to Exchanges, And Inflated the Appearance of Wireless Competition in These Exchanges.

In support of CenturyLink's Petition, Mr. Lubeck, Mr. Brigham, and Mr. Nelson provided Exhibits showing counts of households and housing units and the number of subscribers to CenturyLink service in each wire center, as well as charts summarizing data derived from various modelling efforts that attempt to show the potential availability of CSPs' competitive wireless or wireline communications service to those households. Gullikson Aff. ¶ 16. The counts of households per exchange by CenturyLink witnesses are not, in fact, "actual" counts. CenturyLink used census information as its basis for determining the count of households in each wire center. The census information shows the counts of households in each census block.⁶⁰ Census block boundaries do not correspond with wire center or exchange boundaries except by happenstance. Gullikson Aff. ¶ 17.

CenturyLink's three witnesses each performed a conversion methodology to convert "households per census block" to "households per exchange." Messrs. Brigham and Lubeck

⁶⁰ Census blocks" are the smallest unit in the U.S. census. They range in geographic size from less than a tenth of a square mile to many thousands of square miles. The Staples exchange, for example, has 610 census blocks in its exchange, while the Holdingford exchange has 147 census blocks. Gullikson Aff. ¶ 18.

used a ‘Centroid method’ while Mr. Nelson used a “Random Distribution of Points method.”⁶¹ Lubeck Aff. ¶ 6 fn. 5; Nelson, Ex. 2 ¶ 4.1.2.1 and 4.2; Gullikson Aff. ¶ 19. The centroid method and the random distribution method result in different “counts” of households in each single wire center. CenturyLink’s Petition did not explain why Messrs. Lubeck and Nelson did not choose the same methodology. Gullikson Aff. ¶ 20. In DOC IR No. 76, the Department asked CenturyLink why different methods were used for wireless and wireline. CenturyLink did not answer, but instead provided a third data set that compared the differences between the wireless and wireline methods for counting households in each exchange.

That third data set that compared the differences that between Lubeck’s and Nelson’s counts showed the difference to be **[HIGHLY SENSITIVE TRADE SECRET BEGINS]**

[HIGHLY SENSITIVE

TRADE SECRET ENDS]. Gullikson Aff. ¶ 20-21 and HSTS Attach. 3 (CenturyLink Resp. to DOC IR 76, HSTS Attach. 76A). CenturyLink characterized these differences as ‘minor.’ In fact, however, they were not. Had Mr. Nelson employed the methodology used by CenturyLink’s other two witnesses, it appears probable that the Nashwauk or Comstock exchanges may not have “passed” the 60 percent test or minimally passed the test. Because CenturyLink failed to provide the requested information to specify why different methods were used for wireless and wireline exchanges, it is not possible for the Department to determine with certainty that the different methods were used solely to permit the Nashwauk and Comstock into

⁶¹ Even though neither Mr. Lubeck nor Mr. Nelson used a third method, the “Actual Area Coverage method,” Mr. Lubeck touted the Federal Communication Commission’s (FCC’s) use of this Actual Area Covered method in his Affidavit. Yet, Mr. Nelson stated that he believed the Random Distribution method to be superior to both the Centroid method and the Actual Area Coverage method. Nelson, Ex. 2 ¶ 4.1.2.1; Gullikson Aff. ¶ 19.

“pass” the 60 percent test, while leaving other exchange percentages unaffected.⁶² Gullikson Aff. ¶ 21-22.

The Department recommends that the Commission take notice of this methodological inconsistency, which appears to have changed the outcome of the 60 percent test in the Comstock and Nashwauk exchanges, and of CenturyLink’s failure to provide requested information specifying why different methods were used for wireless and wireline exchanges. In light of the above, the Commission should conclude that CenturyLink has failed to demonstrate to the Commission’s satisfaction that at least 60 percent of households in the Comstock and Nashwauk exchanges can choose voice service from at least one unaffiliated CSP.

D. CENTURYLINK DID NOT ACCOUNT FOR EXCHANGES IN WHICH IT RECEIVED SUBSIDIES FROM THE FCC’S CONNECT AMERICA FUND (CAF).

As Ms. Gullikson explained, and as is discussed above, the Connect America Fund (CAF) is a federal program intended to support broadband deployment in “high cost”⁶³ rural areas. Through grants and a bidding process, incumbent price cap companies (like CenturyLink) are eligible to receive subsidies to assist with the rollout of high speed broadband services to specific locations. Gullikson Aff. ¶ 58. In 2014, the FCC approved Phase II of the CAF and clarified the specifics of the funding process.⁶⁴ The FCC’s determination of which geographic areas are unserved and eligible for CAF Phase II support is based on data provided to the FCC on

⁶² The Department notes that the third data set that compared the differences between the wireless and wireline methods for counting households in each exchange showed that in other exchanges, the differential was less than 2 percent in all other exchanges, and averaged only 1.2 percent. Gullikson Aff. ¶ 20-21

⁶³ A “high cost” area is generally one which has a monthly cost of service between \$52.50 and \$207.81 per line. *A Basic Guide to the Connect America Phase II Challenge Process*, at 2, publ. at http://www.fcc.gov/wcb/tapd/Challenge_Process/ChallengeProcessGuide7-31-14.docx

⁶⁴ https://apps.fcc.gov/edocs_public/attachmatch/FCC-14-54A1.pdf

Form 477. Gullikson Aff. ¶ 59. CAF Phase II subsidies are available only to locations unserved by a subsidized broadband provider. Gullikson Aff. ¶ 60.

The Lubeck Affidavit claims that availability of broadband is a proxy for availability of voice service—that is, that access to broadband service ensures access to voice service from a CSP. Lubeck Aff. ¶ 15; Gullikson Aff. ¶ 60. While not impossible, one can reasonably conclude that a location with no alternative wireline broadband provider is unlikely to have a competitive facilities-based provider of wireline voice services. Gullikson Aff. ¶ 62.

CenturyLink’s failure to address the presence or absence of CSPs in areas for which CenturyLink has received CAF Phase II funding creates a gap in the Company’s support for its Petition. Gullikson Aff. ¶ 63. Mr. Lubeck admits: “it is possible that CenturyLink is receiving CAFII support in census blocks that CenturyLink has determined to be competitive in this proceeding.” Lubeck Second Aff. ¶ 31.

III. SUMMARY OF DEPARTMENT RECOMMENDATIONS

CenturyLink’s Petition contains numerous errors. The Department recommends that, in light of the many errors, the Commission not approve the Petition in exchanges that either do not meet or marginally meet the criteria of Minn. Stat. § 237.025.

A. FIFTY PERCENT TEST

With respect to CenturyLink’s demonstration regarding the “50 percent” test, under which, in each exchange petitioned for, CenturyLink must show that it serves fewer than 50 percent of the households in the exchange, (Section II B of this Initial Brief) CenturyLink undercounted business lines, UNE-P lines and resold lines. In addition, in four wire centers CenturyLink erroneously accounted for “housing units” when the statute requires counting

households⁶⁵. The Department recommends that the Commission find that, in the exchanges identified in **Table 2** below, CenturyLink did not meet the 50 percent criterion or the 50 percent criterion was marginally met, but the margin is insufficient to overcome the defects in CenturyLink's methodology:

B. SIXTY PERCENT TEST

With respect to the "60 percent" test, under which, in each exchange petitioned for, CenturyLink must show that at least 60 percent of the households in the exchange, can choose voice service from a statutory CSP (Section II C of this Initial Brief) the Department recommends that the Petition be denied in "wireless" exchanges lacking adequate indoor service quality, as well as in the Nashwauk and Comstock exchanges, where CenturyLink's switched methodology materially affected its reported "coverage" by a wireless CSP.

The Department further recommends that the Commission find that CenturyLink overstated satisfaction of the 60 percent test in the exchanges where CenturyLink's methodology inflated the percentage of households having access to a wireline CSP, but makes no specific recommendation with respect to whether the Commission should approve or disapprove the Petition in any specific exchange.

The Department does recommend that the Commission consider CenturyLink's failure to follow the requirements of the statute in determining how much of a margin the Commission considers when deciding whether to approve or disapprove the Petition in each such exchange. The Department also recommends that the Commission reject the specific exchanges identified in **Table 3** below that either do not meet the 60 percent criterion, or only marginally meet the

⁶⁵ One of those wire centers, Pike Lake, is a part of the Duluth exchange, and the Department accepts that the Duluth exchange meets the 50 percent test.

criterion and that the margin is not sufficient to overcome the defects in the CenturyLink methodology.

C. SPECIFIC EXCHANGES

TABLE 2: CENTURYLINK DID NOT MEET OR MARGINALLY MET THE 50 PERCENT CRITERION

Exchange	Percentage of households served by CenturyLink
	[HIGHLY SENSITIVE TRADE SECRET BEGINS]
Cook	
Tofte	
Grand Marais	
Swanville	
Biwabik	
Sliver Bay/Finland +	
Pine City	
Coleraine	
Carlton	
Mora	
Ogilvie	
Isanti	
Rush City	
Nashwauk	
	[HIGHLY SENSITIVE TRADE SECRET ENDS]

+Silver Bay and Finland constitute the Silver Bay exchange
 Source: Gullikson HSTS Errata Attachment 6, Column N

TABLE 3: CENTURYLINK DID NOT MEET OR marginally MET THE 60 PERCENT CRITERION

Exchange	Wireline CSP percentage claimed by CenturyLink	Wireless CSP percentage claimed by CenturyLink (Indoor)	Reason Department Recommends Rejection
	[HIGHLY SENSITIVE TRADE SECRET BEGINS]		
Cook			
Biwabik			
Carlton			
Isanti			
Nashwauk			
Holdingsford			
Marble			
Comstock			
Sabin			
Staples			
			[HIGHLY SENSITIVE TRADE SECRET ENDS]

Source: Gullikson Errata HSTS Attachment 6

⁶⁶ CenturyLink reduced the percentage of indoor coverage for Comstock, as shown in its response to DOC IR No. 76B, Gullikson Aff. HSTS Attach. 3.

IV. CONCLUSION

For the reasons discussed in this Initial Brief, the Department recommends that the Commission resolve the Petition as discussed herein.

Dated: March 9, 2016

Respectfully submitted

/s/ Linda S. Jensen

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Department of Commerce

State	CentroidCLLI8	CBFIPS	Cable	Pop	H Holds	WCNAME
MN	CHSHMNCS	271370126001000	Cable	14	6	Chisholm
MN	CHSHMNCS	271370126001002	Cable	19	9	Chisholm
MN	CHSHMNCS	271370126001003	Cable	169	62	Chisholm
MN	CHSHMNCS	271370126001004	Cable	0	0	Chisholm
MN	CHSHMNCS	271370126001005	Cable	15	3	Chisholm
MN	CHSHMNCS	271370126001006	Cable	10	5	Chisholm
MN	CHSHMNCS	271370126001007	Cable	10	4	Chisholm
MN	CHSHMNCS	271370126001008	Cable	34	14	Chisholm
MN	CHSHMNCS	271370126001009	Cable	13	5	Chisholm
MN	CHSHMNCS	271370126001011	Cable	3	3	Chisholm
MN	CHSHMNCS	271370126001012	Cable	15	11	Chisholm
MN	CHSHMNCS	271370126001013	Cable	26	13	Chisholm
MN	CHSHMNCS	271370126001014	Cable	14	8	Chisholm
MN	CHSHMNCS	271370126001015	Cable	24	9	Chisholm
MN	CHSHMNCS	271370126001016	Cable	37	13	Chisholm
MN	CHSHMNCS	271370126001017	Cable	24	11	Chisholm
MN	CHSHMNCS	271370126001018	Cable	18	7	Chisholm
MN	CHSHMNCS	271370126001019	Cable	12	5	Chisholm
MN	CHSHMNCS	271370126001020	Cable	3	2	Chisholm
MN	CHSHMNCS	271370126001021	Cable	35	9	Chisholm
MN	CHSHMNCS	271370126001022	Cable	17	8	Chisholm
MN	CHSHMNCS	271370126001023	Cable	16	10	Chisholm
MN	CHSHMNCS	271370126001024	Cable	31	13	Chisholm
MN	CHSHMNCS	271370126001025	Cable	25	11	Chisholm
MN	CHSHMNCS	271370126001026	Cable	36	13	Chisholm
MN	CHSHMNCS	271370126001027	Cable	22	12	Chisholm
MN	CHSHMNCS	271370126001028	Cable	24	10	Chisholm
MN	CHSHMNCS	271370126001029	Cable	23	11	Chisholm
MN	CHSHMNCS	271370126001030	Cable	21	10	Chisholm
MN	CHSHMNCS	271370126001031	Cable	19	9	Chisholm
MN	CHSHMNCS	271370126001032	Cable	39	13	Chisholm
MN	CHSHMNCS	271370126001033	Cable	62	35	Chisholm
MN	CHSHMNCS	271370126001034	Cable	46	14	Chisholm
MN	CHSHMNCS	271370126001035	Cable	33	14	Chisholm
MN	CHSHMNCS	271370126001036	Cable	32	12	Chisholm
MN	CHSHMNCS	271370126001037	Cable	19	9	Chisholm
MN	CHSHMNCS	271370126001038	Cable	30	12	Chisholm
MN	CHSHMNCS	271370126001039	Cable	42	14	Chisholm
MN	CHSHMNCS	271370126001040	Cable	26	13	Chisholm
MN	CHSHMNCS	271370126001041	Cable	30	15	Chisholm
MN	CHSHMNCS	271370126001042	Cable	25	8	Chisholm
MN	CHSHMNCS	271370126002000	Cable	18	7	Chisholm
MN	CHSHMNCS	271370126002001	Cable	19	8	Chisholm
MN	CHSHMNCS	271370126002002	Cable	23	8	Chisholm
MN	CHSHMNCS	271370126002003	Cable	23	9	Chisholm
MN	CHSHMNCS	271370126002004	Cable	2	1	Chisholm

MN	CHSHMNCS	271370126002005	Cable	17	6	Chisholm
MN	CHSHMNCS	271370126002006	Cable	6	3	Chisholm
MN	CHSHMNCS	271370126002007	Cable	7	3	Chisholm
MN	CHSHMNCS	271370126002008	Cable	0	0	Chisholm
MN	CHSHMNCS	271370126002009	Cable	12	5	Chisholm
MN	CHSHMNCS	271370126002010	Cable	13	6	Chisholm
MN	CHSHMNCS	271370126002011	Cable	14	6	Chisholm
MN	CHSHMNCS	271370126002012	Cable	19	10	Chisholm
MN	CHSHMNCS	271370126002013	Cable	18	10	Chisholm
MN	CHSHMNCS	271370126002014	Cable	24	10	Chisholm
MN	CHSHMNCS	271370126002015	Cable	28	11	Chisholm
MN	CHSHMNCS	271370126002017	Cable	9	5	Chisholm
MN	CHSHMNCS	271370126002018	Cable	25	11	Chisholm
MN	CHSHMNCS	271370126002019	Cable	17	7	Chisholm
MN	CHSHMNCS	271370126002020	Cable	28	8	Chisholm
MN	CHSHMNCS	271370126002021	Cable	21	8	Chisholm
MN	CHSHMNCS	271370126002022	Cable	24	12	Chisholm
MN	CHSHMNCS	271370126002023	Cable	20	11	Chisholm
MN	CHSHMNCS	271370126002024	Cable	21	10	Chisholm
MN	CHSHMNCS	271370126002025	Cable	36	12	Chisholm
MN	CHSHMNCS	271370126002026	Cable	9	4	Chisholm
MN	CHSHMNCS	271370126002027	Cable	6	3	Chisholm
MN	CHSHMNCS	271370126002028	Cable	19	12	Chisholm
MN	CHSHMNCS	271370126002029	Cable	26	12	Chisholm
MN	CHSHMNCS	271370126002030	Cable	33	12	Chisholm
MN	CHSHMNCS	271370126002031	Cable	33	17	Chisholm
MN	CHSHMNCS	271370126002032	Cable	34	16	Chisholm
MN	CHSHMNCS	271370126002033	Cable	30	13	Chisholm
MN	CHSHMNCS	271370126002034	Cable	35	12	Chisholm
MN	CHSHMNCS	271370126002035	Cable	32	14	Chisholm
MN	CHSHMNCS	271370126002036	Cable	33	20	Chisholm
MN	CHSHMNCS	271370126002037	Cable	51	26	Chisholm
MN	CHSHMNCS	271370126003005	Cable	142	65	Chisholm
MN	CHSHMNCS	271370126003006	Cable	23	10	Chisholm
MN	CHSHMNCS	271370126003008	Cable	2	1	Chisholm
MN	CHSHMNCS	271370126003009	Cable	30	9	Chisholm
MN	CHSHMNCS	271370126003010	Cable	9	4	Chisholm
MN	CHSHMNCS	271370126003011	Cable	0	0	Chisholm
MN	CHSHMNCS	271370126003012	Cable	23	8	Chisholm
MN	CHSHMNCS	271370126003013	Cable	6	4	Chisholm
MN	CHSHMNCS	271370126003014	Cable	7	4	Chisholm
MN	CHSHMNCS	271370126003015	Cable	8	2	Chisholm
MN	CHSHMNCS	271370126003016	Cable	8	4	Chisholm
MN	CHSHMNCS	271370126003017	Cable	3	2	Chisholm
MN	CHSHMNCS	271370126003018	Cable	2	1	Chisholm
MN	CHSHMNCS	271370126003019	Cable	3	2	Chisholm
MN	CHSHMNCS	271370126003020	Cable	5	2	Chisholm

MN	CHSHMNCS	271370126003021	Cable	30	9	Chisholm
MN	CHSHMNCS	271370126003022	Cable	1	1	Chisholm
MN	CHSHMNCS	271370126003023	Cable	9	5	Chisholm
MN	CHSHMNCS	271370126003024	Cable	13	4	Chisholm
MN	CHSHMNCS	271370126003025	Cable	10	6	Chisholm
MN	CHSHMNCS	271370126003026	Cable	9	3	Chisholm
MN	CHSHMNCS	271370126003027	Cable	5	3	Chisholm
MN	CHSHMNCS	271370126003028	Cable	22	8	Chisholm
MN	CHSHMNCS	271370126003029	Cable	5	4	Chisholm
MN	CHSHMNCS	271370126003030	Cable	7	4	Chisholm
MN	CHSHMNCS	271370126003031	Cable	3	3	Chisholm
MN	CHSHMNCS	271370126003032	Cable	6	3	Chisholm
MN	CHSHMNCS	271370126003033	Cable	3	3	Chisholm
MN	CHSHMNCS	271370126003034	Cable	10	4	Chisholm
MN	CHSHMNCS	271370126003035	Cable	176	131	Chisholm
MN	CHSHMNCS	271370126003036	Cable	10	6	Chisholm
MN	CHSHMNCS	271370126003037	Cable	91	6	Chisholm
MN	CHSHMNCS	271370126003038	Cable	13	8	Chisholm
MN	CHSHMNCS	271370126003039	Cable	9	3	Chisholm
MN	CHSHMNCS	271370126003042	Cable	17	9	Chisholm
MN	CHSHMNCS	271370126003043	Cable	6	2	Chisholm
MN	CHSHMNCS	271370126003044	Cable	10	3	Chisholm
MN	CHSHMNCS	271370126003045	Cable	9	6	Chisholm
MN	CHSHMNCS	271370126003046	Cable	10	5	Chisholm
MN	CHSHMNCS	271370126003047	Cable	8	4	Chisholm
MN	CHSHMNCS	271370126003048	Cable	9	5	Chisholm
MN	CHSHMNCS	271370126003049	Cable	11	5	Chisholm
MN	CHSHMNCS	271370126003050	Cable	4	2	Chisholm
MN	CHSHMNCS	271370126003051	Cable	11	4	Chisholm
MN	CHSHMNCS	271370126003052	Cable	12	5	Chisholm
MN	CHSHMNCS	271370126003053	Cable	13	4	Chisholm
MN	CHSHMNCS	271370126003054	Cable	9	3	Chisholm
MN	CHSHMNCS	271370126003055	Cable	7	4	Chisholm
MN	CHSHMNCS	271370126003056	Cable	10	3	Chisholm
MN	CHSHMNCS	271370126003058	Cable	2	2	Chisholm
MN	CHSHMNCS	271370126003059	Cable	6	3	Chisholm
MN	CHSHMNCS	271370126003060	Cable	13	5	Chisholm
MN	CHSHMNCS	271370126003061	Cable	9	3	Chisholm
MN	CHSHMNCS	271370126004001	Cable	10	6	Chisholm
MN	CHSHMNCS	271370126004002	Cable	41	15	Chisholm
MN	CHSHMNCS	271370126004003	Cable	23	15	Chisholm
MN	CHSHMNCS	271370126004004	Cable	40	14	Chisholm
MN	CHSHMNCS	271370126004005	Cable	44	15	Chisholm
MN	CHSHMNCS	271370126004006	Cable	30	15	Chisholm
MN	CHSHMNCS	271370126004007	Cable	15	16	Chisholm
MN	CHSHMNCS	271370126004008	Cable	31	15	Chisholm
MN	CHSHMNCS	271370126004009	Cable	46	21	Chisholm

MN	CHSHMNCS	271370126004010	Cable	14	4	Chisholm
MN	CHSHMNCS	271370126004011	Cable	30	18	Chisholm
MN	CHSHMNCS	271370126004012	Cable	52	17	Chisholm
MN	CHSHMNCS	271370126004013	Cable	52	18	Chisholm
MN	CHSHMNCS	271370126004014	Cable	24	15	Chisholm
MN	CHSHMNCS	271370126004015	Cable	52	15	Chisholm
MN	CHSHMNCS	271370126004016	Cable	21	10	Chisholm
MN	CHSHMNCS	271370126004017	Cable	21	9	Chisholm
MN	CHSHMNCS	271370126004018	Cable	42	24	Chisholm
MN	CHSHMNCS	271370126005000	Cable	37	15	Chisholm
MN	CHSHMNCS	271370126005001	Cable	41	15	Chisholm
MN	CHSHMNCS	271370126005002	Cable	36	13	Chisholm
MN	CHSHMNCS	271370126005003	Cable	25	10	Chisholm
MN	CHSHMNCS	271370126005004	Cable	119	77	Chisholm
MN	CHSHMNCS	271370126005006	Cable	29	12	Chisholm
MN	CHSHMNCS	271370126005007	Cable	22	14	Chisholm
MN	CHSHMNCS	271370126005010	Cable	5	2	Chisholm
MN	CHSHMNCS	271370126005011	Cable	6	2	Chisholm
MN	CHSHMNCS	271370126005012	Cable	9	5	Chisholm
MN	CHSHMNCS	271370126005013	Cable	48	17	Chisholm
MN	CHSHMNCS	271370126005014	Cable	23	11	Chisholm
MN	CHSHMNCS	271370126005015	Cable	16	10	Chisholm
MN	CHSHMNCS	271370126005016	Cable	0	0	Chisholm
MN	CHSHMNCS	271370126005017	Cable	18	11	Chisholm
MN	CHSHMNCS	271370126005018	Cable	36	29	Chisholm
MN	CHSHMNCS	271370126005019	Cable	31	16	Chisholm
MN	CHSHMNCS	271370126005020	Cable	15	9	Chisholm
MN	CHSHMNCS	271370126005021	Cable	24	12	Chisholm
MN	CHSHMNCS	271370126005022	Cable	8	4	Chisholm
MN	CHSHMNCS	271370126005023	Cable	42	24	Chisholm
MN	CHSHMNCS	271370126005024	Cable	49	23	Chisholm
MN	CHSHMNCS	271370126005025	Cable	55	20	Chisholm
MN	CHSHMNCS	271370126005026	Cable	0	0	Chisholm
MN	CHSHMNCS	271370126005028	Cable	35	16	Chisholm
MN	CHSHMNCS	271370126005029	Cable	18	9	Chisholm
MN	CHSHMNCS	271370126005030	Cable	0	0	Chisholm
MN	CHSHMNCS	271370126005031	Cable	8	3	Chisholm
MN	CHSHMNCS	271370126006000	Cable	16	15	Chisholm
MN	CHSHMNCS	271370126006001	Cable	20	8	Chisholm
MN	CHSHMNCS	271370126006002	Cable	0	0	Chisholm
MN	CHSHMNCS	271370126006003	Cable	19	9	Chisholm
MN	CHSHMNCS	271370126006004	Cable	57	18	Chisholm
MN	CHSHMNCS	271370126006005	Cable	34	14	Chisholm
MN	CHSHMNCS	271370126006006	Cable	51	20	Chisholm
MN	CHSHMNCS	271370126006007	Cable	37	15	Chisholm
MN	CHSHMNCS	271370126006008	Cable	37	17	Chisholm
MN	CHSHMNCS	271370126006009	Cable	29	14	Chisholm

MN	CHSHMNCS	271370126006010	Cable	46	24	Chisholm
MN	CHSHMNCS	271370126006011	Cable	37	20	Chisholm
MN	CHSHMNCS	271370126006012	Cable	75	24	Chisholm
MN	CHSHMNCS	271370126006013	Cable	27	14	Chisholm
MN	CHSHMNCS	271370126006014	Cable	22	9	Chisholm
MN	CHSHMNCS	271370126006015	Cable	54	21	Chisholm
MN	CHSHMNCS	271370126006016	Cable	23	13	Chisholm
MN	CHSHMNCS	271370126006017	Cable	30	14	Chisholm
MN	CHSHMNCS	271370126006018	Cable	13	4	Chisholm
MN	CHSHMNCS	271370126006019	Cable	131	53	Chisholm
MN	CHSHMNCS	271370126006020	Cable	13	7	Chisholm
MN	CHSHMNCS	271370126006025	Cable	23	12	Chisholm
MN	CHSHMNCS	271370126006026	Cable	22	8	Chisholm
MN	CHSHMNCS	271370126006031	Cable	0	0	Chisholm
MN	CHSHMNCS	271370126006045	Cable	0	0	Chisholm
MN	CHSHMNCS	271370151003012	Cable	13	4	Chisholm
MN	CHSHMNCS	271370151003032	Cable	25	10	Chisholm
MN	CHSHMNCS	271370151003041	Cable	42	15	Chisholm
MN	CHSHMNCS	271370151003051	Cable	16	6	Chisholm
MN	CHSHMNCS	271370151003054	Cable	34	12	Chisholm
MN	CHSHMNCS	271370151004001	Cable	127	40	Chisholm

2303 households in 208 census blocks marked "cable"

MN	CHSHMNCS	270614804001127	None	0	0	Chisholm
MN	CHSHMNCS	270614804001174	None	5	1	Chisholm
MN	CHSHMNCS	270614804001175	None	0	0	Chisholm
MN	CHSHMNCS	270614804001176	None	10	4	Chisholm
MN	CHSHMNCS	270614804001177	None	0	0	Chisholm
MN	CHSHMNCS	270614804001179	None	12	7	Chisholm
MN	CHSHMNCS	270614804001180	None	13	3	Chisholm
MN	CHSHMNCS	270614804001181	None	5	7	Chisholm
MN	CHSHMNCS	270614804001182	None	9	3	Chisholm
MN	CHSHMNCS	270614804001183	None	23	5	Chisholm
MN	CHSHMNCS	270614804001184	None	0	0	Chisholm
MN	CHSHMNCS	270614804001185	None	7	2	Chisholm
MN	CHSHMNCS	270614804001186	None	0	0	Chisholm
MN	CHSHMNCS	270614804001187	None	4	1	Chisholm
MN	CHSHMNCS	270614804001188	None	0	0	Chisholm
MN	CHSHMNCS	270614804001189	None	0	2	Chisholm
MN	CHSHMNCS	270614804001190	None	4	1	Chisholm
MN	CHSHMNCS	270614804001191	None	9	4	Chisholm
MN	CHSHMNCS	270614804001192	None	0	0	Chisholm
MN	CHSHMNCS	270614804001193	None	0	0	Chisholm
MN	CHSHMNCS	270614804001194	None	0	0	Chisholm
MN	CHSHMNCS	270614804001195	None	0	0	Chisholm
MN	CHSHMNCS	270614804001196	None	0	1	Chisholm
MN	CHSHMNCS	270614804001213	None	13	5	Chisholm

MN	CHSHMNCS	270614804001214	None	0	0	Chisholm
MN	CHSHMNCS	270614804001215	None	0	0	Chisholm
MN	CHSHMNCS	270614804001260	None	0	0	Chisholm
MN	CHSHMNCS	270614804001261	None	0	0	Chisholm
MN	CHSHMNCS	270614804001262	None	0	0	Chisholm
MN	CHSHMNCS	270614804001263	None	0	0	Chisholm
MN	CHSHMNCS	270614804001322	None	0	0	Chisholm
MN	CHSHMNCS	271370121001000	None	0	0	Chisholm
MN	CHSHMNCS	271370126001001	None	0	0	Chisholm
MN	CHSHMNCS	271370126001010	None	0	0	Chisholm
MN	CHSHMNCS	271370126002016	None	0	0	Chisholm
MN	CHSHMNCS	271370126003000	None	0	0	Chisholm
MN	CHSHMNCS	271370126003001	None	0	0	Chisholm
MN	CHSHMNCS	271370126003002	None	0	0	Chisholm
MN	CHSHMNCS	271370126003003	None	0	0	Chisholm
MN	CHSHMNCS	271370126003004	None	0	0	Chisholm
MN	CHSHMNCS	271370126003007	None	0	0	Chisholm
MN	CHSHMNCS	271370126003040	None	0	0	Chisholm
MN	CHSHMNCS	271370126003041	None	0	0	Chisholm
MN	CHSHMNCS	271370126003057	None	1	1	Chisholm
MN	CHSHMNCS	271370126003062	None	0	0	Chisholm
MN	CHSHMNCS	271370126003063	None	0	0	Chisholm
MN	CHSHMNCS	271370126004000	None	0	0	Chisholm
MN	CHSHMNCS	271370126004019	None	0	0	Chisholm
MN	CHSHMNCS	271370126004020	None	0	0	Chisholm
MN	CHSHMNCS	271370126004021	None	0	0	Chisholm
MN	CHSHMNCS	271370126004022	None	0	0	Chisholm
MN	CHSHMNCS	271370126004023	None	0	0	Chisholm
MN	CHSHMNCS	271370126004024	None	0	0	Chisholm
MN	CHSHMNCS	271370126004025	None	0	0	Chisholm
MN	CHSHMNCS	271370126004026	None	0	0	Chisholm
MN	CHSHMNCS	271370126004027	None	0	0	Chisholm
MN	CHSHMNCS	271370126005005	None	0	0	Chisholm
MN	CHSHMNCS	271370126005008	None	0	0	Chisholm
MN	CHSHMNCS	271370126005009	None	0	0	Chisholm
MN	CHSHMNCS	271370126005027	None	0	0	Chisholm
MN	CHSHMNCS	271370126005032	None	0	0	Chisholm
MN	CHSHMNCS	271370126005033	None	0	0	Chisholm
MN	CHSHMNCS	271370126006021	None	5	9	Chisholm
MN	CHSHMNCS	271370126006022	None	0	0	Chisholm
MN	CHSHMNCS	271370126006023	None	0	0	Chisholm
MN	CHSHMNCS	271370126006024	None	0	0	Chisholm
MN	CHSHMNCS	271370126006027	None	0	0	Chisholm
MN	CHSHMNCS	271370126006028	None	0	0	Chisholm
MN	CHSHMNCS	271370126006029	None	0	0	Chisholm
MN	CHSHMNCS	271370126006030	None	0	0	Chisholm
MN	CHSHMNCS	271370126006032	None	0	0	Chisholm

MN	CHSHMNCS	271370126006033	None	0	0	Chisholm
MN	CHSHMNCS	271370126006034	None	0	0	Chisholm
MN	CHSHMNCS	271370126006035	None	0	0	Chisholm
MN	CHSHMNCS	271370126006036	None	0	0	Chisholm
MN	CHSHMNCS	271370126006037	None	0	0	Chisholm
MN	CHSHMNCS	271370126006038	None	0	0	Chisholm
MN	CHSHMNCS	271370126006039	None	0	0	Chisholm
MN	CHSHMNCS	271370126006040	None	0	0	Chisholm
MN	CHSHMNCS	271370126006041	None	0	0	Chisholm
MN	CHSHMNCS	271370126006042	None	0	0	Chisholm
MN	CHSHMNCS	271370126006044	None	0	0	Chisholm
MN	CHSHMNCS	271370127001037	None	0	0	Chisholm
MN	CHSHMNCS	271370127001164	None	0	0	Chisholm
MN	CHSHMNCS	271370151001116	None	10	4	Chisholm
MN	CHSHMNCS	271370151001119	None	2	1	Chisholm
MN	CHSHMNCS	271370151001124	None	3	1	Chisholm
MN	CHSHMNCS	271370151001125	None	5	1	Chisholm
MN	CHSHMNCS	271370151001126	None	7	3	Chisholm
MN	CHSHMNCS	271370151001127	None	0	0	Chisholm
MN	CHSHMNCS	271370151001152	None	0	1	Chisholm
MN	CHSHMNCS	271370151001153	None	0	0	Chisholm
MN	CHSHMNCS	271370151001154	None	0	0	Chisholm
MN	CHSHMNCS	271370151001157	None	6	2	Chisholm
MN	CHSHMNCS	271370151001158	None	4	3	Chisholm
MN	CHSHMNCS	271370151001159	None	1	1	Chisholm
MN	CHSHMNCS	271370151001161	None	8	3	Chisholm
MN	CHSHMNCS	271370151002008	None	23	6	Chisholm
MN	CHSHMNCS	271370151002009	None	17	5	Chisholm
MN	CHSHMNCS	271370151002010	None	0	0	Chisholm
MN	CHSHMNCS	271370151002011	None	0	0	Chisholm
MN	CHSHMNCS	271370151002012	None	0	0	Chisholm
MN	CHSHMNCS	271370151002013	None	1	0	Chisholm
MN	CHSHMNCS	271370151002014	None	8	1	Chisholm
MN	CHSHMNCS	271370151002015	None	12	4	Chisholm
MN	CHSHMNCS	271370151002016	None	0	0	Chisholm
MN	CHSHMNCS	271370151002017	None	0	0	Chisholm
MN	CHSHMNCS	271370151002018	None	11	3	Chisholm
MN	CHSHMNCS	271370151002019	None	11	2	Chisholm
MN	CHSHMNCS	271370151002020	None	4	0	Chisholm
MN	CHSHMNCS	271370151002021	None	6	1	Chisholm
MN	CHSHMNCS	271370151002022	None	12	5	Chisholm
MN	CHSHMNCS	271370151002023	None	0	0	Chisholm
MN	CHSHMNCS	271370151002024	None	8	1	Chisholm
MN	CHSHMNCS	271370151002025	None	0	0	Chisholm
MN	CHSHMNCS	271370151002032	None	0	0	Chisholm
MN	CHSHMNCS	271370151002034	None	1	0	Chisholm
MN	CHSHMNCS	271370151002038	None	0	0	Chisholm

MN	CHSHMNCS	271370151002039	None	0	0	Chisholm
MN	CHSHMNCS	271370151002040	None	0	0	Chisholm
MN	CHSHMNCS	271370151002041	None	0	0	Chisholm
MN	CHSHMNCS	271370151002042	None	0	0	Chisholm
MN	CHSHMNCS	271370151002043	None	0	0	Chisholm
MN	CHSHMNCS	271370151002044	None	0	0	Chisholm
MN	CHSHMNCS	271370151002045	None	0	0	Chisholm
MN	CHSHMNCS	271370151002046	None	0	0	Chisholm
MN	CHSHMNCS	271370151002047	None	0	0	Chisholm
MN	CHSHMNCS	271370151002048	None	0	0	Chisholm
MN	CHSHMNCS	271370151002049	None	0	0	Chisholm
MN	CHSHMNCS	271370151002050	None	0	0	Chisholm
MN	CHSHMNCS	271370151002051	None	11	2	Chisholm
MN	CHSHMNCS	271370151002052	None	0	0	Chisholm
MN	CHSHMNCS	271370151002053	None	0	1	Chisholm
MN	CHSHMNCS	271370151002054	None	0	0	Chisholm
MN	CHSHMNCS	271370151002055	None	0	0	Chisholm
MN	CHSHMNCS	271370151002056	None	0	0	Chisholm
MN	CHSHMNCS	271370151002057	None	0	0	Chisholm
MN	CHSHMNCS	271370151002058	None	10	2	Chisholm
MN	CHSHMNCS	271370151002059	None	0	0	Chisholm
MN	CHSHMNCS	271370151002060	None	3	1	Chisholm
MN	CHSHMNCS	271370151002061	None	2	1	Chisholm
MN	CHSHMNCS	271370151002062	None	7	2	Chisholm
MN	CHSHMNCS	271370151002063	None	0	0	Chisholm
MN	CHSHMNCS	271370151002064	None	1	0	Chisholm
MN	CHSHMNCS	271370151002065	None	0	0	Chisholm
MN	CHSHMNCS	271370151002066	None	11	7	Chisholm
MN	CHSHMNCS	271370151002074	None	0	0	Chisholm
MN	CHSHMNCS	271370151002075	None	0	0	Chisholm
MN	CHSHMNCS	271370151002076	None	19	19	Chisholm
MN	CHSHMNCS	271370151002078	None	6	1	Chisholm
MN	CHSHMNCS	271370151002084	None	0	0	Chisholm
MN	CHSHMNCS	271370151002114	None	9	1	Chisholm
MN	CHSHMNCS	271370151002115	None	5	3	Chisholm
MN	CHSHMNCS	271370151002116	None	3	1	Chisholm
MN	CHSHMNCS	271370151002122	None	0	0	Chisholm
MN	CHSHMNCS	271370151002123	None	0	0	Chisholm
MN	CHSHMNCS	271370151002124	None	0	0	Chisholm
MN	CHSHMNCS	271370151002125	None	1	1	Chisholm
MN	CHSHMNCS	271370151002126	None	0	0	Chisholm
MN	CHSHMNCS	271370151002127	None	0	0	Chisholm
MN	CHSHMNCS	271370151002128	None	0	0	Chisholm
MN	CHSHMNCS	271370151002129	None	0	0	Chisholm
MN	CHSHMNCS	271370151002130	None	0	0	Chisholm
MN	CHSHMNCS	271370151002131	None	0	0	Chisholm
MN	CHSHMNCS	271370151002132	None	0	0	Chisholm

MN	CHSHMNCS	271370151002133	None	5	0	Chisholm
MN	CHSHMNCS	271370151002134	None	35	34	Chisholm
MN	CHSHMNCS	271370151002135	None	0	0	Chisholm
MN	CHSHMNCS	271370151002136	None	0	0	Chisholm
MN	CHSHMNCS	271370151002137	None	2	0	Chisholm
MN	CHSHMNCS	271370151002138	None	10	3	Chisholm
MN	CHSHMNCS	271370151002139	None	10	4	Chisholm
MN	CHSHMNCS	271370151002140	None	0	0	Chisholm
MN	CHSHMNCS	271370151002141	None	0	0	Chisholm
MN	CHSHMNCS	271370151002142	None	37	14	Chisholm
MN	CHSHMNCS	271370151002143	None	0	0	Chisholm
MN	CHSHMNCS	271370151002144	None	0	0	Chisholm
MN	CHSHMNCS	271370151002145	None	0	0	Chisholm
MN	CHSHMNCS	271370151002146	None	0	0	Chisholm
MN	CHSHMNCS	271370151002147	None	0	0	Chisholm
MN	CHSHMNCS	271370151002148	None	0	0	Chisholm
MN	CHSHMNCS	271370151002149	None	18	3	Chisholm
MN	CHSHMNCS	271370151002150	None	35	12	Chisholm
MN	CHSHMNCS	271370151002151	None	0	0	Chisholm
MN	CHSHMNCS	271370151002152	None	0	0	Chisholm
MN	CHSHMNCS	271370151002153	None	0	0	Chisholm
MN	CHSHMNCS	271370151002154	None	11	4	Chisholm
MN	CHSHMNCS	271370151002155	None	4	1	Chisholm
MN	CHSHMNCS	271370151002158	None	0	0	Chisholm
MN	CHSHMNCS	271370151002159	None	0	0	Chisholm
MN	CHSHMNCS	271370151002160	None	0	0	Chisholm
MN	CHSHMNCS	271370151002161	None	0	0	Chisholm
MN	CHSHMNCS	271370151002162	None	15	9	Chisholm
MN	CHSHMNCS	271370151002163	None	0	0	Chisholm
MN	CHSHMNCS	271370151002166	None	11	3	Chisholm
MN	CHSHMNCS	271370151003000	None	0	0	Chisholm
MN	CHSHMNCS	271370151003001	None	0	0	Chisholm
MN	CHSHMNCS	271370151003002	None	0	0	Chisholm
MN	CHSHMNCS	271370151003003	None	5	3	Chisholm
MN	CHSHMNCS	271370151003004	None	6	3	Chisholm
MN	CHSHMNCS	271370151003005	None	0	0	Chisholm
MN	CHSHMNCS	271370151003006	None	8	2	Chisholm
MN	CHSHMNCS	271370151003007	None	40	17	Chisholm
MN	CHSHMNCS	271370151003008	None	16	5	Chisholm
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MN	CHSHMNCS	271370151003010	None	18	5	Chisholm
MN	CHSHMNCS	271370151003011	None	24	12	Chisholm
MN	CHSHMNCS	271370151003013	None	1	1	Chisholm
MN	CHSHMNCS	271370151003014	None	63	22	Chisholm
MN	CHSHMNCS	271370151003015	None	16	6	Chisholm
MN	CHSHMNCS	271370151003016	None	5	1	Chisholm
MN	CHSHMNCS	271370151003017	None	12	4	Chisholm

MN	CHSHMNCS	271370151003018	None	19	8	Chisholm
MN	CHSHMNCS	271370151003019	None	21	9	Chisholm
MN	CHSHMNCS	271370151003020	None	19	11	Chisholm
MN	CHSHMNCS	271370151003021	None	51	16	Chisholm
MN	CHSHMNCS	271370151003022	None	17	7	Chisholm
MN	CHSHMNCS	271370151003023	None	14	8	Chisholm
MN	CHSHMNCS	271370151003024	None	0	0	Chisholm
MN	CHSHMNCS	271370151003025	None	4	1	Chisholm
MN	CHSHMNCS	271370151003026	None	14	6	Chisholm
MN	CHSHMNCS	271370151003027	None	0	0	Chisholm
MN	CHSHMNCS	271370151003028	None	0	1	Chisholm
MN	CHSHMNCS	271370151003029	None	0	1	Chisholm
MN	CHSHMNCS	271370151003030	None	0	1	Chisholm
MN	CHSHMNCS	271370151003031	None	0	1	Chisholm
MN	CHSHMNCS	271370151003033	None	3	2	Chisholm
MN	CHSHMNCS	271370151003034	None	27	11	Chisholm
MN	CHSHMNCS	271370151003035	None	3	2	Chisholm
MN	CHSHMNCS	271370151003036	None	12	4	Chisholm
MN	CHSHMNCS	271370151003037	None	0	0	Chisholm
MN	CHSHMNCS	271370151003038	None	0	0	Chisholm
MN	CHSHMNCS	271370151003039	None	0	0	Chisholm
MN	CHSHMNCS	271370151003040	None	0	0	Chisholm
MN	CHSHMNCS	271370151003042	None	17	7	Chisholm
MN	CHSHMNCS	271370151003043	None	0	0	Chisholm
MN	CHSHMNCS	271370151003044	None	0	0	Chisholm
MN	CHSHMNCS	271370151003045	None	2	1	Chisholm
MN	CHSHMNCS	271370151003046	None	0	0	Chisholm
MN	CHSHMNCS	271370151003047	None	0	0	Chisholm
MN	CHSHMNCS	271370151003048	None	0	0	Chisholm
MN	CHSHMNCS	271370151003049	None	19	10	Chisholm
MN	CHSHMNCS	271370151003050	None	9	3	Chisholm
MN	CHSHMNCS	271370151003052	None	0	0	Chisholm
MN	CHSHMNCS	271370151003053	None	2	1	Chisholm
MN	CHSHMNCS	271370151003055	None	0	0	Chisholm
MN	CHSHMNCS	271370151003056	None	7	3	Chisholm
MN	CHSHMNCS	271370151003057	None	10	5	Chisholm
MN	CHSHMNCS	271370151003058	None	6	3	Chisholm
MN	CHSHMNCS	271370151003059	None	0	0	Chisholm
MN	CHSHMNCS	271370151003060	None	0	0	Chisholm
MN	CHSHMNCS	271370151003061	None	0	0	Chisholm
MN	CHSHMNCS	271370151003062	None	0	1	Chisholm
MN	CHSHMNCS	271370151003063	None	0	0	Chisholm
MN	CHSHMNCS	271370151003064	None	9	3	Chisholm
MN	CHSHMNCS	271370151003065	None	0	0	Chisholm
MN	CHSHMNCS	271370151003066	None	0	0	Chisholm
MN	CHSHMNCS	271370151003067	None	0	0	Chisholm
MN	CHSHMNCS	271370151003068	None	0	0	Chisholm

MN	CHSHMNCS	271370151003069	None	0	0	Chisholm
MN	CHSHMNCS	271370151003070	None	0	0	Chisholm
MN	CHSHMNCS	271370151003071	None	0	0	Chisholm
MN	CHSHMNCS	271370151003072	None	0	0	Chisholm
MN	CHSHMNCS	271370151003073	None	0	0	Chisholm
MN	CHSHMNCS	271370151003074	None	0	0	Chisholm
MN	CHSHMNCS	271370151003075	None	0	0	Chisholm
MN	CHSHMNCS	271370151003076	None	0	0	Chisholm
MN	CHSHMNCS	271370151003077	None	0	0	Chisholm
MN	CHSHMNCS	271370151003078	None	0	0	Chisholm
MN	CHSHMNCS	271370151003083	None	0	0	Chisholm
MN	CHSHMNCS	271370151003086	None	0	0	Chisholm
MN	CHSHMNCS	271370151003095	None	0	0	Chisholm
MN	CHSHMNCS	271370151003096	None	0	0	Chisholm
MN	CHSHMNCS	271370151003097	None	0	0	Chisholm
MN	CHSHMNCS	271370151003098	None	0	0	Chisholm
MN	CHSHMNCS	271370151003099	None	0	0	Chisholm
MN	CHSHMNCS	271370151003100	None	0	0	Chisholm
MN	CHSHMNCS	271370151003101	None	0	0	Chisholm
MN	CHSHMNCS	271370151003102	None	0	0	Chisholm
MN	CHSHMNCS	271370151003105	None	0	0	Chisholm
MN	CHSHMNCS	271370151003106	None	0	0	Chisholm
MN	CHSHMNCS	271370151003107	None	0	0	Chisholm
MN	CHSHMNCS	271370151003108	None	0	0	Chisholm
MN	CHSHMNCS	271370151003109	None	0	0	Chisholm
MN	CHSHMNCS	271370151003110	None	0	0	Chisholm
MN	CHSHMNCS	271370151003111	None	0	0	Chisholm
MN	CHSHMNCS	271370151003112	None	0	0	Chisholm
MN	CHSHMNCS	271370151003113	None	0	0	Chisholm
MN	CHSHMNCS	271370151003114	None	0	0	Chisholm
MN	CHSHMNCS	271370151003115	None	0	0	Chisholm
MN	CHSHMNCS	271370151003122	None	0	0	Chisholm
MN	CHSHMNCS	271370151003123	None	0	0	Chisholm
MN	CHSHMNCS	271370151003124	None	0	0	Chisholm
MN	CHSHMNCS	271370151003125	None	0	0	Chisholm
MN	CHSHMNCS	271370151003126	None	0	0	Chisholm
MN	CHSHMNCS	271370151003127	None	0	0	Chisholm
MN	CHSHMNCS	271370151003128	None	15	8	Chisholm
MN	CHSHMNCS	271370151003129	None	0	0	Chisholm
MN	CHSHMNCS	271370151003130	None	0	0	Chisholm
MN	CHSHMNCS	271370151003131	None	0	0	Chisholm
MN	CHSHMNCS	271370151003132	None	0	0	Chisholm
MN	CHSHMNCS	271370151003133	None	0	0	Chisholm
MN	CHSHMNCS	271370151003134	None	0	0	Chisholm
MN	CHSHMNCS	271370151003135	None	0	0	Chisholm
MN	CHSHMNCS	271370151003136	None	0	0	Chisholm
MN	CHSHMNCS	271370151003137	None	0	0	Chisholm

MN	CHSHMNCS	271370151003138	None	0	0	Chisholm
MN	CHSHMNCS	271370151003139	None	0	0	Chisholm
MN	CHSHMNCS	271370151003140	None	0	0	Chisholm
MN	CHSHMNCS	271370151003141	None	0	0	Chisholm
MN	CHSHMNCS	271370151003142	None	0	0	Chisholm
MN	CHSHMNCS	271370151003143	None	0	0	Chisholm
MN	CHSHMNCS	271370151004000	None	0	0	Chisholm
MN	CHSHMNCS	271370151004002	None	34	9	Chisholm
MN	CHSHMNCS	271370151004003	None	0	0	Chisholm
MN	CHSHMNCS	271370151004004	None	0	0	Chisholm
MN	CHSHMNCS	271370151004005	None	0	0	Chisholm
MN	CHSHMNCS	271370151004006	None	0	0	Chisholm
MN	CHSHMNCS	271370151004007	None	3	1	Chisholm
MN	CHSHMNCS	271370151004008	None	0	0	Chisholm
MN	CHSHMNCS	271370151004009	None	7	3	Chisholm
MN	CHSHMNCS	271370151004010	None	0	0	Chisholm
MN	CHSHMNCS	271370151004011	None	6	1	Chisholm
MN	CHSHMNCS	271370151004012	None	18	4	Chisholm
MN	CHSHMNCS	271370151004013	None	0	0	Chisholm
MN	CHSHMNCS	271370151004014	None	0	0	Chisholm
MN	CHSHMNCS	271370151004015	None	19	7	Chisholm
MN	CHSHMNCS	271370151004016	None	2	0	Chisholm
MN	CHSHMNCS	271370151004017	None	2	1	Chisholm
MN	CHSHMNCS	271370151004018	None	1	1	Chisholm
MN	CHSHMNCS	271370151004019	None	1	0	Chisholm
MN	CHSHMNCS	271370151004020	None	0	0	Chisholm
MN	CHSHMNCS	271370151004021	None	0	0	Chisholm
MN	CHSHMNCS	271370151004022	None	0	0	Chisholm
MN	CHSHMNCS	271370151004023	None	35	13	Chisholm
MN	CHSHMNCS	271370151004024	None	22	5	Chisholm
MN	CHSHMNCS	271370151004025	None	0	0	Chisholm
MN	CHSHMNCS	271370151004026	None	0	0	Chisholm
MN	CHSHMNCS	271370151004027	None	0	0	Chisholm
MN	CHSHMNCS	271370151004028	None	0	0	Chisholm
MN	CHSHMNCS	271370151004029	None	0	0	Chisholm
MN	CHSHMNCS	271370151004030	None	0	0	Chisholm
MN	CHSHMNCS	271370151004031	None	22	5	Chisholm
MN	CHSHMNCS	271370151004032	None	2	1	Chisholm
MN	CHSHMNCS	271370151004033	None	30	27	Chisholm
MN	CHSHMNCS	271370151004034	None	0	0	Chisholm
MN	CHSHMNCS	271370151004035	None	46	31	Chisholm
MN	CHSHMNCS	271370151004036	None	29	32	Chisholm
MN	CHSHMNCS	271370151004037	None	11	9	Chisholm
MN	CHSHMNCS	271370151004038	None	0	0	Chisholm
MN	CHSHMNCS	271370151004039	None	15	7	Chisholm
MN	CHSHMNCS	271370151004040	None	13	8	Chisholm
MN	CHSHMNCS	271370151004041	None	0	0	Chisholm

MN	CHSHMNCS	271370151004042	None	34	23	Chisholm
MN	CHSHMNCS	271370151004043	None	3	0	Chisholm
MN	CHSHMNCS	271370151004044	None	0	0	Chisholm
MN	CHSHMNCS	271370151004045	None	33	20	Chisholm
MN	CHSHMNCS	271370151004046	None	3	1	Chisholm
MN	CHSHMNCS	271370151004047	None	0	0	Chisholm
MN	CHSHMNCS	271370151004048	None	0	0	Chisholm
MN	CHSHMNCS	271370151004049	None	10	6	Chisholm
MN	CHSHMNCS	271370151004050	None	22	4	Chisholm
MN	CHSHMNCS	271370151004051	None	19	11	Chisholm
MN	CHSHMNCS	271370151004052	None	7	2	Chisholm
MN	CHSHMNCS	271370151004053	None	7	2	Chisholm
MN	CHSHMNCS	271370151004054	None	4	2	Chisholm
MN	CHSHMNCS	271370151004055	None	0	0	Chisholm
MN	CHSHMNCS	271370151004056	None	16	11	Chisholm
MN	CHSHMNCS	271370151004057	None	10	14	Chisholm
MN	CHSHMNCS	271370151004058	None	0	0	Chisholm
MN	CHSHMNCS	271370151004059	None	25	8	Chisholm
MN	CHSHMNCS	271370151004060	None	0	0	Chisholm
MN	CHSHMNCS	271370151004061	None	0	0	Chisholm
MN	CHSHMNCS	271370151004062	None	16	3	Chisholm
MN	CHSHMNCS	271370151004063	None	0	0	Chisholm
MN	CHSHMNCS	271370151004064	None	0	0	Chisholm
MN	CHSHMNCS	271370151004065	None	0	0	Chisholm
MN	CHSHMNCS	271370151004066	None	17	4	Chisholm
MN	CHSHMNCS	271370151004067	None	0	0	Chisholm
MN	CHSHMNCS	271370151004068	None	0	0	Chisholm
MN	CHSHMNCS	271370151004069	None	20	8	Chisholm
MN	CHSHMNCS	271370151004070	None	0	0	Chisholm
MN	CHSHMNCS	271370151004071	None	5	1	Chisholm
MN	CHSHMNCS	271370151004072	None	31	13	Chisholm
MN	CHSHMNCS	271370151004073	None	3	1	Chisholm
MN	CHSHMNCS	271370151004074	None	2	2	Chisholm
MN	CHSHMNCS	271370151004075	None	0	0	Chisholm
MN	CHSHMNCS	271370151004076	None	1	0	Chisholm
MN	CHSHMNCS	271370151004077	None	0	0	Chisholm
MN	CHSHMNCS	271370151004078	None	0	0	Chisholm
MN	CHSHMNCS	271370151004079	None	0	0	Chisholm
MN	CHSHMNCS	271370151004080	None	0	0	Chisholm
MN	CHSHMNCS	271370151004081	None	0	0	Chisholm
MN	CHSHMNCS	271370151004082	None	0	0	Chisholm
MN	CHSHMNCS	271370151004083	None	4	2	Chisholm
MN	CHSHMNCS	271370151004084	None	0	0	Chisholm
MN	CHSHMNCS	271370151004085	None	0	0	Chisholm
MN	CHSHMNCS	271370151004086	None	3	0	Chisholm
MN	CHSHMNCS	271370151004087	None	0	0	Chisholm
MN	CHSHMNCS	271370151004088	None	0	0	Chisholm

MN	CHSHMNCS	271370151004089	None	0	0	Chisholm
MN	CHSHMNCS	271370151004090	None	0	0	Chisholm
MN	CHSHMNCS	271370151004091	None	0	0	Chisholm
MN	CHSHMNCS	271370151004092	None	0	0	Chisholm
MN	CHSHMNCS	271370151004093	None	0	0	Chisholm
MN	CHSHMNCS	271370151004094	None	0	0	Chisholm
MN	CHSHMNCS	271370151004095	None	0	0	Chisholm
MN	CHSHMNCS	271370151004096	None	2	0	Chisholm
MN	CHSHMNCS	271370151004097	None	8	2	Chisholm
MN	CHSHMNCS	271370151004098	None	1	0	Chisholm
MN	CHSHMNCS	271370151004099	None	0	0	Chisholm
MN	CHSHMNCS	271370151004100	None	0	0	Chisholm
MN	CHSHMNCS	271370151004101	None	2	0	Chisholm
MN	CHSHMNCS	271370151004102	None	14	5	Chisholm
MN	CHSHMNCS	271370151004103	None	0	0	Chisholm
MN	CHSHMNCS	271370151004104	None	1	0	Chisholm
MN	CHSHMNCS	271370151004105	None	0	0	Chisholm
MN	CHSHMNCS	271370151004106	None	0	0	Chisholm
MN	CHSHMNCS	271370151004107	None	0	0	Chisholm
MN	CHSHMNCS	271370151004108	None	0	0	Chisholm
MN	CHSHMNCS	271370151004109	None	0	0	Chisholm
MN	CHSHMNCS	271370151004110	None	0	0	Chisholm
MN	CHSHMNCS	271370151004111	None	0	0	Chisholm
MN	CHSHMNCS	271370151004112	None	0	0	Chisholm
MN	CHSHMNCS	271370151004113	None	0	0	Chisholm

761 Households in 425 census blocks marked "None"