

December 12, 2018

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

RE: **Petition of LTD Broadband, LLC. for Designation as an Eligible Telecommunications Carrier (ETC)**
Docket No: P6995/M-18-653

Dear Mr. Wolf:

Attached are comments of the Department of Commerce concerning the Petition of LTD Broadband, LLC (LTD) for Designation as an Eligible Telecommunications Carrier (ETC). This petition is in response to LTD's winning bid in the Connect America Fund Auction (CAF II).

The petition was filed on October 22, 2018 by:
Corey Hauer
CEO
LTD Broadband, LLC
69 Teahouse Street
Las Vegas, NV 89138

The Department recommends that the Commission approve LTD's request for ETC status for high cost support in the Census Blocks listed in Exhibit 1, if the following are met:

- 1) LTD should provide a clear explanation of how it will satisfy the requirement of providing a telecommunications service.
- 2) If LTD demonstrates that it will be providing a telecommunications service, it should explain why the provision of the telecommunications service does not require a certificate of authority from the Commission.
- 3) LTD should show that the Department of Public Safety is satisfied with its 911 arrangements to ensure consumer protections exist with emergency 911 calling.

Sincerely,
/s/ JOY GULLIKSON
Rate Analyst

JG/jl
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Petition of LTD Broadband, LLC for Designation as an Eligible Telecommunications Carrier (ETC)

Docket No: P6995/M-18-653

I. ISSUE

Whether the Minnesota Public Utilities Commission (Commission) should grant the petition of LTD Broadband, LLC (LTD) for ETC status for high cost support in the census blocks for which LTD will receive Connect America Funds II (CAFII) funding.

II. PROCEDURAL HISTORY

By public notice from the FCC on August 28, 2018, LTD was named a winning bidder in the CAF II auction, to receive \$1,104,440.80, and serving 840 locations. The CAF II award is given in monthly installments for 10 years (about \$10.96 per location per month for LTD), as long as LTD meets certain build out requirements. The 840 locations are in the census blocks listed and shown in Exhibit 1. LTD is to provide Internet and voice services.

In order to receive the CAF II support, LTD, along with all other recipients, must certify to the FCC and USAC that it has received designation as an ETC eligible for high cost funding no later than February 25, 2019.

Additional requirements for CAF II support recipients include:

- Offer commercially at least one voice and one broadband service meeting the relevant service requirements to the required number of locations in the following timeframe:
 - 40% of the required number of locations in a state by the end of third year of support
 - An additional 20% in each subsequent year
 - 100% by the end of the sixth year of support
- The exact deployment schedule is determined by the carriers themselves, not the FCC.
- File with USAC annual reports and build-out milestone certifications, as well as data on the locations where service is available. Failure to meet the terms and conditions of support can result in increased reporting obligations and possible withholding and/or recovery of support.

- Offer at least one broadband and voice service at rates that are reasonably comparable to the rates for similar service in urban areas. The FCC uses its annual Urban Rate Survey to determine the range of rates that are reasonably comparable¹.

The FCC named fifteen companies as CAF II winners for Minnesota locations. They are:

Company	Amount (\$)	Locations	Amount (\$) /Location	Amount (\$) /Location/10 years/month
Broadband Corp	428,117	128	3,344.66	27.87
Consolidated Telephone	934,933.80	358	2,611.55	21.76
Farmers Mutual	348,991.60	163	2,141.05	17.84
Federated Coop	1,431,038.80	808	1,771.09	14.76
Garden Valley	880,346	95	9,266.80	77.22
Halstad Telephone	19,635.20	7	2,805.03	23.38
Interstate Telephone	552,329.60	209	2,642.73	22.02
Jaguar	510,587.60	672	759.80	6.33
Johnson Telephone	81,272.50	47	1,729.20	14.41
LTD Broadband	1,104,440.80	840	1,314.81	10.96
Midcontinent	27,977,283.80	7410	3,775.61	31.46
Paul Bunyan	1,313,542.60	315	4,169.98	34.75
Roseau Electric	2,081,769.70	326	6,385.80	53.22
West Central Telephone	611,934.40	532	1,150.25	9.59
Wikstrom	532,556.80	56	9,509.94	79.25
TOTALS	38,808,780.20	11,966	53,378.30	
<i>AVERAGES</i>	<i>2,587,252.01</i>	<i>798</i>	<i>3,558.55</i>	29.65

III. LEGAL STANDARDS

The Code of Federal Regulations Part 54 governs the federal requirements for common carriers becoming ETCs. Federal Communications Commission (FCC) orders have adjusted some of these regulations over the years. Most of the adjustments have been to reduce reporting requirements. Parts relevant to this petition include:

¹ From <https://www.fcc.gov/auction/903>.

§ 54.101 (b) requires “an eligible telecommunications carrier must offer voice telephony as set forth in paragraph (a) of this section in order to receive federal universal service support.” Part (a) requires voice grade access to the public switched network or its functional equivalent must be provided.

§ 54.201 states in parts (d), (e), and (h):

(d) “A common carrier designated as an ETC under this section shall be eligible to receive universal service support in accordance with section 254 of the Act and shall, throughout the service area for which the designation is received:

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

(e) For the purposes of this section, the term facilities means any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part. (f) For the purposes of this section, the term “own facilities” includes, but is not limited to, facilities obtained as unbundled network elements pursuant to part 51 of this chapter, provided that such facilities meet the definition of the term “facilities” under this subpart.

(h) A state commission shall not designate a common carrier as an eligible telecommunications carrier for purposes of receiving support only under subpart E [Lifeline] of this part unless the carrier seeking such designation has demonstrated that it is financially and technically capable of providing the supported Lifeline service in compliance with subpart E of this part

§ 54.203 states in part: “If no common carrier will provide the services that are supported by federal universal service support mechanisms under section 254(c) of the Act and subpart B of this part to an unserved community or any portion thereof that requests such service, the Commission, with respect to interstate services, or a state commission, with respect to intrastate services, shall determine which common carrier or carriers are best able to provide such service to the requesting unserved community or portion thereof and shall order such carrier or carriers to provide such service for that unserved community or portion thereof.”

As a winner in the CAF II auction, ETCs designated to receive High Cost Program support are

- Required to provide Lifeline-supported broadband in areas where they commercially offer broadband service pursuant to their High Cost Program obligations.
- Required to comply with all service requirements, including any future rules changes, and the annually-updated minimum service standards.²

Minnesota Statute section 403.025, Emergency Telecommunications System Required, subp. 3 states: “Every owner and operator of a wire-line or wireless circuit switched or packet-based telecommunications system connected to the public switched telephone network shall design and maintain the system to dial the 911 number without charge to the caller.”

Minnesota Rules 7811.1400 and 7812.1400, subp. 13 state: “The commission may order an LSP to provide the services that are supported by a federal universal service support mechanism to an otherwise unserved area only as provided in section 102(a) of the act and consistent with Minnesota Statutes, sections 237.081 and 237.16.”

Minn. Rule 7812.0600 subp. 4 and 7811.0600, subp.4 state Subp. 4. An LSP designated an ETC by the commission must provide local service, including, if necessary, facilities-based service, to all requesting customers within the carrier's service area on a nondiscriminatory basis, regardless of a customer's proximity to the carrier's facilities. An LSP may assess special construction charges approved by the commission if existing facilities are not available to serve the customer.

Also, in Docket P999/M-05-1169, *Order Adopting FCC Requirements for Designating Eligible Telecommunications Carriers, As Modified*, the Commission ordered:

“After the date of this Order, petitioners to the Commission to be designated an eligible telecommunications carrier under 47 U.S.C. 214(e)(2) must:

- (1) (A) Commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. Each applicant shall certify that it (1) provide service on a timely basis to requesting customers within the applicant's service area where the applicant's network already passes the potential customer's premises; and (2) provide service within a reasonable period of time, if the potential customer is with the applicant's licensed service area but outside its existing network coverage, if service can be provided at reasonable cost by (a) modifying or replacing the requesting customer's equipment; (b) deploying a roof-mounted antenna or other equipment; (c) adjusting the nearest cell tower; (d) adjusting network or customer facilities; (e) reselling services from another carrier's facilities to provide service; or (f) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment”

² <https://www.usac.org/li/program-requirements/lifeline-LTD.aspx>

In setting the requirements for this round of auction to receive the CAF II funding, the FCC required:

“Each Connect America Fund support recipient must offer voice as a standalone service, but may separately bundle its broadband offerings with a voice service.”³ USF/ICC Transformation Order, 26 FCC Rcd at 17693, para. 80.

Congress, in 47 USC § 214 (e), requires as a precondition to accessing FCC high cost or Lifeline support subsidies, that providers be designated Eligible Telecommunication Carriers by a state commission. Telecommunications carriers are defined by 47 USC § 153 (51) as “any provider of telecommunications services [and a] telecommunications carrier shall be treated as a common carrier . . . only to the extent that it is engaged in telecommunications services.”

The regulatory status of VOIP service has recently been in litigation. The Minnesota Commission found that fixed⁴ VOIP services are subject to applicable consumer protections for telecommunications service under Minnesota statutes, as there has been no federal preemption of the Commission’s authority.⁵ Although the FCC has not classified fixed or over-the-top VoIP as being either an information service or a telecommunications service, in a 2-1 split decision, the Eighth Circuit Court of Appeals found that all VoIP service is an information service.⁶ The Minnesota Commission’s request for an en banc rehearing of the Eighth Circuit decision was recently denied. In the absence of any action that would stay the Eighth Circuits decision, it is the Department’s understanding that VOIP services are information services, in those states that are part of the Eighth Circuit. Thus, in the Eighth Circuit, companies may not use their VoIP service offering to satisfy the above stated requirement that an ETC must be a provider of telecommunications services.

IV. ANALYSIS

In this current application, LTD requests ETC for high cost in the census blocks it will receive CAF II funds. The census block numbers that are the subject of the CAF II award are listed in Exhibit 1. The following provides some of the primary provisions for ETC certification:

1. Facilities and Commitment to Serve - LTD states that it will provide broadband and voice telephone over its own facilities and through facilities purchased wholesale.

³ USF/ICC Transformation Order, 26 FCC Rcd at 17693, para. 80.

⁴ The term “fixed” represents those services at a stationary location, as opposed to “over-the-top” or “bring your own broadband” VoIP services that may be used from any location that the customer has access to the internet. Over-the-top VoIP is also referred to as “nomadic VoIP.”

⁵ See. *In the Matter of the Complaint of the Minnesota Department of Commerce Against the Charter Affiliates Regarding Transfer of Customers*, Order Finding Jurisdiction and Requiring Compliance Filing, Docket No. P6716,5615/C-14-383. July 28, 2015.

⁶ *Opinion*, 2018 WL 4260322 (8th Cir September 7, 2018)

2. LTD's Basic Universal Service Offering - LTD agrees to provide voice telephony in the Service Area at rates that are reasonably comparable to the rates for similar service in urban areas. LTD intends to charge \$24.95 per month for voice service. According to LTD: "Voice grade access to the Public Switched Network or its functional equivalent is provided by LTD using Twilio as a wholesale VoIP provider along with our voice softswitch cluster." LTD does not explain how it offers a telecommunications service, as opposed to an information service.
3. LTD's Advertising Plan - LTD states that it will meet the advertising requirements through several different channels of general distribution, including newspaper, radio, and direct mail, consistent with its existing advertising practices. LTD states that it will offer Lifeline discounts to qualifying customers and will offer toll limitation services. Unless LTD needs to be a certified local service provider in Minnesota, its local service customers will not be able to receive the Minnesota Telephone Assistance Plan credit from LTD.
4. LTD's Ability to Remain Functional in Emergency Situations - LTD states that its network can and will remain functional in emergencies and is designed to remain functional in emergency situations without an external power source.
5. LTD certifies that it complies with applicable service quality standards and consumer protection obligations ". . . under both federal and, to a limited extent under Minnesota state law as a telecommunications carrier subject to Minnesota Public Utilities regulation." Commission's Rules in Chapter 7810 establishing minimum standards on various operational matters, such as 7810.3900 (Emergency Operations); 7810.4900 (Adequacy of Service); and 7810.5300 (Dial Service Requirements). However, these rules are applicable to telecommunications service and LTD's VoIP offering is not subject to the Commission's jurisdiction. If, however, LTD can show how it provides a telecommunications service that requires a certificate of authority from the Commission, then these rules will apply. LTD acknowledges that it will need to file a Local Exchange Tariff,⁷ but in the absence of the company having a certificate of authority; a tariff would be for informational purposes only.
6. The Department has no information regarding LTD's filing a 911 plan, although LTD states in its application that it will provide access to emergency services with 911 access to the Public Safety Answering Point for all areas where it provides local service. As an ETC, LTD will be the retail provider to customers of local service and will be the means for customer to dial 911 to reach emergency services. In the course of certifying a local service provider, companies are required to file a 911 plan as part of that process. Although LTD's VoIP service is an information service, the company should still work with the Department of Public Safety to ensure all of the 911 arrangements necessary to protect consumers have been addressed.

⁷ LTD application pps 8-9.

7. LTD's Requirement to Serve Unserved Areas - Under Minnesota Rules 7812.1400 and 7811.1400, the Commission may order an LSP to provide the services supported by a federal universal service support mechanism to an otherwise unserved area. Under 47 C.F.R. § 54.203, the FCC may do the same. Since LTD's VoIP offering is an information service, the Commission should be aware that it will not have the jurisdiction to enforce these rules, unless LTD demonstrates that it is providing a telecommunications service.
8. Requirement to provide telecommunications services. Congress, in 47 U.S.C. § 214 (e), required as a precondition to accessing FCC high cost or consumer specific "lifeline" support subsidies, that providers be designated "Eligible Telecommunications Carriers" (ETCs) by a State commission.⁸ As explained by the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Utility Consumer Advocates (NASUCA) in their September 28, 2108 Amicus Brief to the United States Court of Appeals for the Eighth Circuit: "State commissions across the country have certified numerous ETCs based on their provision of I-VoIP as a telecommunications service. Neither the FCC nor any State Commission can ignore the Congressional restrictions and certify carriers that only provide information services."⁹ To do otherwise would be defrauding the USF fund. Thus, in order to be granted ETC status, LTD must provide telecommunications service.

LTD maintains that it offers information services and that it is not subject to Commission jurisdiction except for the purpose of obtaining status as an ETC. The position of LTD is consistent with the Eighth Circuit decision classifying VoIP as an information service. However, since it is a requirement for an ETC to provide telecommunications service, the petition by LTD cannot be approved without a clear explanation of how it will satisfy this legal requirement.

LTD does not have a certificate of authority from the Commission to operate as a telecommunications carrier in Minnesota. To the extent that LTD does not offer a telecommunications service, there is no service for which a certificate of authority is required; and the consumer protections provided for in the statutes and Commission's rules will not apply. However, to the extent that LTD demonstrates that it will be providing a

⁸ "Telecommunications carriers" are defined as "any provider of telecommunications services [and a] telecommunications carrier shall be treated as a common carrier under this chapter only to the extent that it is engaged in providing telecommunications services." 47 U.S.C. § 153 (51). (emphasis added). The federal universal service fund program is "under this chapter" in 47 U.S.C. § 254 (51).

⁹ See Motion Seeking Leave to File Brief of Amici Curiae The National Association of Regulatory Utility Commissioners and The National Association of State Consumer Advocates Supporting Defendant-Appellants Petition for Rehearing En Banc, Appeal from the U.S. District Court for the District of Minnesota, No.15-cv-3925, at page 5.

telecommunications service, as required to receive its ETC certification, then LTD should explain why the provision of the telecommunications service does not require a certificate of authority from the Commission.

V. COMMISSION OPTIONS

- A. Approve LTD's request for ETC status for high cost support in the Census Blocks listed in Exhibit1.
- B. Approve LTD's request for ETC status for high cost support in the Census Blocks listed in Exhibit 1, if the following are met:
 - 1. LTD should provide a clear explanation of how it will satisfy the requirement of providing a telecommunications service
 - 2. If LTD demonstrates that it will be providing a telecommunications service, it should explain why the provision of the telecommunications service does not require a certificate of authority from the Commission.
 - 3. LTD should show that the Department of Public Safety is satisfied with its 911 arrangements to ensure consumer protections exist with emergency 911 calling.
- C. Deny LTD's request for ETC status for high cost support in the Census Blocks listed in Exhibit 1.
- D. Take other action, as the Commission deems appropriate.

VI. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission order option B: Approve LTD's request for ETC status for high cost support in the Census Blocks listed in Exhibit 1, if the following are met:

- 1) LTD should provide a clear explanation of how it will satisfy the requirement of providing a telecommunications service
- 2) If LTD demonstrates that it will be providing a telecommunications service, it should explain why the provision of the telecommunications service does not require a certificate of authority from the Commission.
- 3) LTD should show that the Department of Public Safety is satisfied with its 911 arrangements to ensure consumer protections exist with emergency 911 calling.

/jl
Attachment

Exhibit A

CAF II LTD Broadband Awarded Census Blocks

CENSUS BLOCK	EXCHANGE	CENSUS BLOCK	EXCHANGE
270190901004033	WATERTOWN	270370615011013	LAKEVILLE
270190901004042	WATERTOWN	270370615011016	LAKEVILLE
270190907013036	VICTORIA	270370615011029	LAKEVILLE
270190907021001	MINNEAPOLIS/ST. PAUL	270370615011031	FARMINGTON
270190908001011	VICTORIA	270370615011031	LAKEVILLE
270190908001014	VICTORIA	270370615011032	FARMINGTON
270190908001015	VICTORIA	270370615011032	LAKEVILLE
270190908001028	VICTORIA	270370615011046	FARMINGTON
270190909003008	CHASKA	270399501001007	W CONCORD
270370603011019	ST. PAUL	270399501001007	WANAMINGO
270370603011022	ST. PAUL	270399501001072	W CONCORD
270370603011030	ST. PAUL	270399501001076	W CONCORD
270370604021001	ST. PAUL	270399501001090	W CONCORD
270370604021009	ST. PAUL	270399501001095	W CONCORD
270370605081010	ST. PAUL	270459601001067	CHATFIELD
270370606041046	ST. PAUL	270459601001092	FOUNTAIN
270370606051031	ST. PAUL	270459603001058	SPRING VALLEY
270370606051039	ST. PAUL	270459603001072	SPRING VALLEY
270370607162009	ST. PAUL	270459603004068	SPRING VALLEY
270370607172014	ST. PAUL	270459604004025	PRESTON
270370607172021	ST. PAUL	270459604004077	SPRING VALLEY
270370607172024	ST. PAUL	270459604004113	CHERRY GRV
270370607172039	ST. PAUL	270459605001014	CHERRY GRV
270370607253026	MINNEAPOLIS	270459605001014	NORTH CHESTER
270370607253026	MINNEAPOLIS	270459605001014	SPRING VALLEY
270370607253026	ST. PAUL	270459605001059	CHERRY GRV
270370607262025	ST. PAUL	270459605001062	NORTH CHESTER
270370607451007	BURNSVILLE	270459605001073	LEROY
270370607451007	MINNEAPOLIS	270459605001073	NORTH CHESTER
270370607452002	BURNSVILLE	270459605001123	LEROY
270370607481032	MINNEAPOLIS	270459605001123	NORTH CHESTER
270370608203023	LAKEVILLE	270459605001124	NORTH CHESTER
270370611082023	HASTINGS	270459605002071	PRESTON
270370614012015	HASTINGS	270490803002062	LAKE CITY
270370615011004	LAKEVILLE	270490803002069	LAKE CITY
270370615011009	LAKEVILLE	270490803002088	LAKE CITY
270370615011011	LAKEVILLE	270490804001121	CANNON FLS
270370615011012	LAKEVILLE	270490804002013	RED WING

270490805002006	CANNON FLS	271034801002108	NEW SWEDEN
270677804002080	WILLMAR	271034801002117	LAFAYETTE
270677804002081	WILLMAR	271034801002122	LAFAYETTE
270677806003089	WILLMAR	271034801002122	NEW SWEDEN
270799501002071	MONTGOMERY	271034801002123	NEW SWEDEN
270799501002086	MONTGOMERY	271034801002128	LAFAYETTE
270799502001017	LE SUEUR	271034801002130	LAFAYETTE
270799502002024	LE SUEUR	271034801002130	NICOLLET
270799502003016	LE SUEUR	271034801002134	LAFAYETTE
270799502004035	LE SUEUR	271034801002134	NEW SWEDEN
270799502004046	LE SUEUR	271034801002134	NICOLLET
270935601001078	LITCHFIELD	271034801002138	LAFAYETTE
270935601001124	COKATO	271034801002139	LAFAYETTE
270935601001136	COKATO	271034801003114	FAIRFAX
270935601001164	DASSEL	271034802001014	LAFAYETTE
270935601002051	COKATO	271034802001014	NEW SWEDEN
270935601002051	DASSEL	271034802001017	NEW SWEDEN
270935601002093	DASSEL	271034802001029	NEW SWEDEN
270935602001001	LITCHFIELD	271034802001032	NEW SWEDEN
270935602001011	LITCHFIELD	271034802001033	NEW SWEDEN
270935602001035	LITCHFIELD	271034802001035	NEW SWEDEN
270935602004077	LITCHFIELD	271034802001038	NEW SWEDEN
270935602004094	LITCHFIELD	271034802001039	NEW SWEDEN
270935602004113	LITCHFIELD	271034802001041	NEW SWEDEN
270935605002002	LITCHFIELD	271034802001043	NEW SWEDEN
270935605002018	LITCHFIELD	271034802001044	NEW SWEDEN
270935605002025	LITCHFIELD	271034802001046	NEW SWEDEN
270935605002027	LITCHFIELD	271034802001047	NEW SWEDEN
270935605002063	GROVE CITY	271034802001048	NEW SWEDEN
270935605002063	LITCHFIELD	271034802001052	NEW SWEDEN
270935605002082	GROVE CITY	271034802001052	NICOLLET
270935605002106	GROVE CITY	271034802001059	NEW SWEDEN
270935605002115	LITCHFIELD	271034802001071	NEW SWEDEN
270935605002126	LITCHFIELD	271034802001071	NICOLLET
270935605004135	LITCHFIELD	271034802001072	NEW SWEDEN
270935605004169	LITCHFIELD	271034802001073	NEW SWEDEN
270935605004184	LITCHFIELD	271034802001083	NICOLLET
270935605004185	LITCHFIELD	271034802001119	ST PETER
270935605004189	LITCHFIELD	271034802001141	NEW SWEDEN
270935605004190	LITCHFIELD	271034802001141	NICOLLET
270935605004197	GROVE CITY	271034802001143	NEW SWEDEN
270935605004197	LITCHFIELD	271034802002007	ST PETER
271034801001008	LAFAYETTE	271034802002011	ST PETER
271034801001011	LAFAYETTE	271034802002069	NICOLLET
271034801001011	NICOLLET	271034802002078	NICOLLET
271034801002062	LAFAYETTE	271034802002142	CAMBRIA
271034801002066	LAFAYETTE	271034802002143	CAMBRIA
271034801002067	LAFAYETTE	271034802002146	CAMBRIA

271034802002147	CAMBRIA	271390803012067	MINNEAPOLIS/ST. PAUL
271034802002148	CAMBRIA	271390805001013	MINNEAPOLIS/ST. PAUL
271034802002154	CAMBRIA	271390807002001	CHASKA
271034802002155	CAMBRIA	271390807002001	MINNEAPOLIS/ST. PAUL
271034802002157	CAMBRIA	271390807002006	MINNEAPOLIS/ST. PAUL
271034802003008	LE SUEUR	271390807002025	MINNEAPOLIS/ST. PAUL
271034802003023	LE SUEUR	271390808003009	JORDAN
271034802003036	NEW SWEDEN	271390808003009	MINNEAPOLIS/ST. PAUL
271034802003053	ST PETER	271390808003012	MINNEAPOLIS/ST. PAUL
271034802003097	NEW SWEDEN	271390808003024	MINNEAPOLIS/ST. PAUL
271034802003097	ST PETER	271390808003029	JORDAN
271034802003160	ST PETER	271390808003029	MINNEAPOLIS/ST. PAUL
271034802003246	ST PETER	271390808003068	JORDAN
271034802004056	CAMBRIA	271390808003100	JORDAN
271034802004064	CAMBRIA	271390808003109	JORDAN
271034802004065	CAMBRIA	271390809031089	MINNEAPOLIS/ST. PAUL
271034804001026	ST PETER	271390809033012	MINNEAPOLIS/ST. PAUL
271090019002076	ROCHESTER	271390813001060	LE SUEUR
271090019002091	ROCHESTER	271390813002003	JORDAN
271090020001095	CHATFIELD	271390813002004	JORDAN
271090022002032	STEWARTVILLE	271390813002017	JORDAN
271090022002128	STEWARTVILLE	271390813002018	BELLE PLAINE
271090022003045	ROCHESTER	271390813002018	JORDAN
271090022003071	ROCHESTER	271390813002022	BELLE PLAINE
271277501002005	REDWOOD FALLS	271390813002022	JORDAN
271277501002020	REDWOOD FALLS	271390813002023	BELLE PLAINE
271277501002036	REDWOOD FALLS	271390813002023	JORDAN
271277502001126	REDWOOD FALLS	271390813002034	BELLE PLAINE
271277502001138	REDWOOD FALLS	271390813002034	JORDAN
271277504002121	LAMBERTON	271390813002039	BELLE PLAINE
271277504002127	LAMBERTON	271390813002043	JORDAN
271277504002128	LAMBERTON	271390813002044	JORDAN
271277504002132	LAMBERTON	271390813002045	JORDAN
271277506001028	LAMBERTON	271390813002046	JORDAN
271277506001224	LAMBERTON	271390813002047	JORDAN
271310703001033	FARIBAULT	271390813002051	BELLE PLAINE
271310704001062	FARIBAULT	271390813002059	BELLE PLAINE
271310706022002	NORTHFIELD	271390813002059	JORDAN
271310707001000	FARIBAULT	271390813002060	BELLE PLAINE
271390802011003	MINNEAPOLIS	271390813002060	JORDAN
271390802011003	MINNEAPOLIS	271390813002065	BELLE PLAINE
271390802011003	MINNEAPOLIS/ST. PAUL	271390813002065	JORDAN
271390803011002	MINNEAPOLIS/ST. PAUL	271390813002085	BELLE PLAINE
271390803011069	MINNEAPOLIS/ST. PAUL	271390813003069	BELLE PLAINE
271390803012018	MINNEAPOLIS/ST. PAUL	271431703001098	GAYLORD
271390803012019	MINNEAPOLIS/ST. PAUL	271431703001099	GAYLORD
271390803012020	MINNEAPOLIS/ST. PAUL	271431703001178	GAYLORD
271390803012022	MINNEAPOLIS/ST. PAUL	271431703001213	GAYLORD

271450102001012	ST CLOUD	271450113024015	COLD SPRING
271450102001046	ST CLOUD	271450113041060	ST CLOUD
271450102001075	ST CLOUD	271450113041067	ST CLOUD
271450102001076	ST CLOUD	271450113041072	ST CLOUD
271450102002037	ST CLOUD	271450113041075	ST CLOUD
271450102003022	ST CLOUD	271450113041076	ST CLOUD
271450102003045	ST JOSEPH	271450113041081	ST CLOUD
271450102003078	ST JOSEPH	271450113041114	ST CLOUD
271450102003120	ST JOSEPH	271450113041129	ST CLOUD
271450104011069	AVON	271450113041154	ST CLOUD
271450104012040	AVON	271450113041156	ST CLOUD
271450104031101	HOLDINGFORD	271450113041166	ST CLOUD
271450104032028	HOLDINGFORD	271450113041176	COLD SPRING
271450112001005	COLD SPRING	271450113041176	ST CLOUD
271450112001005	ST CLOUD	271450113041180	ST CLOUD
271450112001033	COLD SPRING	271450113041189	ST CLOUD
271450112004021	ST CLOUD	271450114001061	ST CLOUD
271450113012008	ST JOSEPH	271450114001067	ST CLOUD
271450113012125	ST JOSEPH	271450114001078	ST CLOUD
271450113021033	COLD SPRING	271450114001079	ST CLOUD

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Comments**

Docket No. P6995/M-18-653

Dated this 12th day of December 2018

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_18-653_M-18-653
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-653_M-18-653
David	Denton	david.denton@state.mn.us	DPS ECN	445 Minnesota Street Suite 137 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-653_M-18-653
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-653_M-18-653
Pete	Eggimann	PEGGIMANN@MN-MESB.ORG	Metropolitan Emergency Services Board	2099 University Ave W Ste 201 St. Paul, MN 551043431	Electronic Service	No	OFF_SL_18-653_M-18-653
Corey	Hauer	coreyhauer@gmail.com	LTD Broadband LLC	69 Teahouse St Las Vegas, NV 89138	Electronic Service	No	OFF_SL_18-653_M-18-653
Dana	Wahlberg	dana.wahlberg@state.mn.us	Department of Public Safety	Town Square Ste 137 444 Cedar St St. Paul, MN 551015126	Electronic Service	No	OFF_SL_18-653_M-18-653
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-653_M-18-653