

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

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| Beverly Jones Heydinger | Chair |
| Dr. David C. Boyd | Commissioner |
| Nancy Lange | Commissioner |
| Dan Lipschultz | Commissioner |
| Betsy Wergin | Commissioner |

In the Matter of the Commission
Investigation of the Completion
of Long-Distance Calls to Rural
Areas in Minnesota

MPUC Docket No: P999/CI-12-1329

**ANSWER OF THE MINNESOTA CABLE COMMUNICATIONS ASSOCIATION
TO INTEGRA’S PETITION FOR RECONSIDERATION OR IN THE
ALTERNATIVE AMENDMENT OF THE COMMISSION’S JULY 21, 2014
ORDER**

The Minnesota Cable Communications Association (the “MCCA”) submits this Answer to Integra Telecom of Minnesota, Inc. and Eschelon Telecom of Minnesota, Inc. dba Integra’s (“Integra”) Petition for Reconsideration. Integra supports the MCCA’s petition for reconsideration which requested that the Minnesota Public Utilities Commission (“Commission”) pursue intrastate rural call completion problems on a case by case basis rather than impose new reporting requirements on all originating long distance providers. However, should the Commission insist on going forward with the reporting rules, Integra proposed several amendments to the new rules.

The MCCA agrees with Integra that if the Commission does not reconsider its Order in this proceeding, the Commission should consider clarifying its new reporting rules with several amendments. Integra’s amendments provide the rules with a sharper focus on intrastate rural calls and a closer alignment with the practices and operations of

originating carriers. While the MCCA fully supports Integra's proposed amendments to the reporting rules, the MCCA proposes two minor clarifications to Integra's proposed definition of reportable complaints. Consequently, should the Commission decide to proceed with its new reporting rules but agrees to consider Integra's proposed amendments, the MCCA respectfully requests that the Commission also consider a further clarification of Integra's definition of a reportable complaint.

The Definition of a Reportable Complaint Should be Clarified.

Integra requests that the Commission clarify the definition of a call completion complaint and advances the following definition:

A reportable call completion complaint is a complaint by a carrier or customer, to an originating carrier, regarding the repeated failure of intrastate calls to terminate to an end user or end users associated with a rural carrier, as defined in the *FCC Rural Call Completion Order*, at a time when the customer[s] originating the call to an end user served by a rural carrier is able to terminate calls to other end user.¹

The MCCA concurs that a sharper focus on the definition of a rural call completion complaint is needed, but suggests two further refinements. The phrase "end user associated with a rural carrier" and "end user served by a rural carrier" raises the question of what "associated with" or "served by" mean. The MCCA suggests that "associated with" and "served by" be changed to "of." Accordingly, the definition of a reportable complaint would be as follows:

A reportable call completion complaint is a complaint by a carrier or customer, to an originating carrier, regarding the repeated failure of intrastate calls to terminate to an end user or end users of a rural carrier, as defined in the *FCC Rural Call Completion Order*, at a time when the customer[s] originating the call to an end user of a rural carrier is able to terminate calls to other end users.

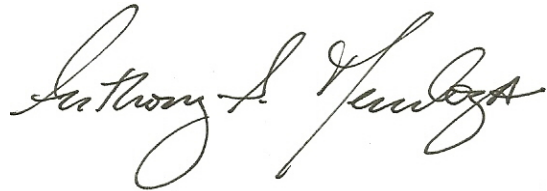
¹ Integra Petition at 6.

Conclusion

The MCCA and Integra agree that rural call completion problems should be investigated on a complaint basis. However, should the Commission determine to proceed with imposing industry-wide reporting rules, the MCCA supports Integra's proposed amendments to the rules, and further urges the Commission to adopt the clarifications to the amendment as set out above.

MINNESOTA CABLE
COMMUNICATIONS ASSOCIATION

Dated: August 21, 2014

A handwritten signature in black ink, reading "Anthony S. Mendoza". The signature is written in a cursive style with a large, looping initial "A".

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