

Staff Briefing Papers

Meeting Date January 24, 2019 Agenda Item 7 *

Company Wikstrom Telephone Company
West Central Telephone
Paul Bunyan Telephone Cooperative
Garden Valley Telephone Cooperative
Halstad Telephone Company
Federated Telephone Cooperative
Interstate Telecommunications Cooperative
Consolidated Telephone Company
Farmers Mutual Telephone Company

Docket No. **P999/CI-18-634**
P432/M-18-549
P431/AM-18-601
P432/AM-18-605
P409/AM-18-607
P530/M-18-626
P523/AM-18-630
P515/AM-18-637
P406/AM-18-645
P522/AM-18-718

In the Matter of Petitions for Eligible Telecommunications Carrier (ETC) Designation in Minnesota

Issues

1. Should the Commission approve the requests for ETC designation in Minnesota?
2. Should the Commission deem any other actions appropriate?

Staff Michael McCarthy Michael.mccarthy@state.mn.us 651-201-2208



Relevant Documents

Date

| | |
|---|--------------------|
| 18-549 Wikstrom Petition for ETC Designation (Amended) | September 12, 2018 |
| 18-601 West Central Petition for ETC Designation | September 19, 2018 |
| 18-605 Paul Bunyan Petition for ETC Designation | September 21, 2018 |



Relevant Documents

| | Date |
|--|--------------------|
| 18-607 Garden Valley Petition for ETC Designation | September 25, 2018 |
| 18-626 Halstad Petition for ETC Designation | October 1, 2018 |
| 18-630 Federated Petition for ETC Designation | October 3, 2018 |
| 18-634 Notice of Filing Requirement and Comment Period for CAF II Grant Winners | October 10, 2018 |
| 18-645 Consolidated Petition for ETC Designation | October 15, 2018 |
| 18-637 Interstate Petition for ETC Designation (3 parts) | October 23, 2018 |
| 18-549 Department Comments on Wikstrom Petition | November 6, 2018 |
| 18-645 Department Comments on Consolidated Petition | November 7, 2018 |
| 18-607 Department Comments on Garden Valley Petition | November 16, 2018 |
| 18-626 Department Comments on Halstad Petition | November 16, 2018 |
| 18-630 Department Comments on Federated Petition | November 16, 2018 |
| 18-605 Department Comments on Paul Bunyan Petition | November 20, 2018 |
| 18-718 Farmers Mutual Petition for ETC Designation | November 20, 2018 |
| 18-637 Department Comments on Interstate Petition | November 27, 2018 |
| 18-601 Department Comments on West Central Petition | November 29, 2018 |
| 18-718 Department Comments on Farmers Mutual Petition | November 30, 2018 |
| 18-634 Reply Comments of the Office of Broadband Development | December 13, 2018 |
| 18-634 Department Letter on VoIP as an Information Service | December 14, 2018 |


I. Statement of the Issues

1. Should the Commission approve the requests for ETC designation in Minnesota?
2. Should the Commission deem any other actions appropriate?

II. Background

These nine petitions are the result of the companies having won the FCC Connect America Fund (CAF) II Auction 903 for certain census blocks in Minnesota. Each company needs to have its Eligible Telecommunications Carrier (ETC) status update approved by February 25, 2019 in order to receive those funds. All nine filings in this proceeding pertain to incumbent local exchange carriers (ILECs) petitioning for high cost ETC status in new areas while Wikstrom, Farmers and Consolidated (Docket No. 18-549, 18-718, and 18-645) also request Lifeline ETC status. The FCC named a total of fifteen companies as CAF II winners for Minnesota locations. They are shown in the Department's table below (See DOC Comments in all proceedings p. 2-3) with the nine pending ETC status approvals in this proceeding highlighted.

| Company | Amount (\$) | Locations | Amount (\$)/ Location | Amount (\$)/ Location 10 years/month |
|-------------------------------|------------------------|---------------|--------------------------|--|
| Broadband Corporation | \$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 |

 Staff Briefing Papers for Docket Nos. P999/CI-18-634; P432/M-18-549; P431/AM-18-601; P432/AM-18-605; P409/AM-18-607; P530/M-18-626; P523/AM-18-630; P515/AM-18-637; P406/AM-18-645; and P522/AM-18-718.

The Department notes in its Comments in each proceeding in the “Legal Standards” section that the process for ETC designation by the Commission is outlined in Minn. Rules pt. 7811.1400 and 7812.1400. It also provides a one page overview of applicable federal law (47 C.F.R. Part 54).

A short company overview for each petition is provided in the following Section III. Staff analysis is provided in Section IV thereafter.

III. Company Overview


Wikstrom Telephone Company (Docket No. 18-549)

On September 12, 2018, Wikstrom Telephone Company (WikTel) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, WikTel became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent. In 2009, under Docket No. P432/NA-09-984, WikTel expanded its service area and received CLEC authority for the exchanges shown in pink in Exhibit 1 of the Department’s Comments.

By public notice from the FCC on August 28, 2018, WikTel was named a winning bidder in the CAF II auction, to receive \$532,556.80 by serving 56 locations. The CAF II award is given in monthly installments over 10 years (about \$79.25 per location per month for WikTel) as long as WikTel meets certain build out requirements. The 56 locations are in the census blocks within the Roseau and Warroad exchange service areas, identified by the yellow outline on Exhibit 1 of the Department’s Comments. The census blocks of the CAF II award are also listed at the bottom of Exhibit 1 in the Department’s Comments.

West Central Telephone Assoc. (Docket No. 18-601)

On September 20, 2018, West Central Telephone Association (WCTA) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, West Central became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent. Under Docket No. P431/NA-06-723, West Central received CLEC authority in the exchanges of Wadena and Staples. Under Docket No. P431/AM-17-835, West Central received ETC status for Lifeline only in its two CLEC exchanges. West Central’s service areas are shown in Exhibit 1 of the Department’s Comments.

 Staff Briefing Papers for Docket Nos. P999/CI-18-634; P432/M-18-549; P431/AM-18-601; P432/AM-18-605; P409/AM-18-607; P530/M-18-626; P523/AM-18-630; P515/AM-18-637; P406/AM-18-645; and P522/AM-18-718.

By public notice from the FCC on August 28, 2018, West Central was named as a winning bidder in the CAF II auction, to receive \$611,934.40 and serving 532 locations. The CAF II award is given in monthly installments for 10 years (about \$9.59 per location per month for West Central), as long as West Central meets certain build out requirements. The 532 locations are in the census block within the two CLEC exchanges. The applicable census blocks are listed in Exhibit 1 of the Department's Comments.


Paul Bunyan Rural Telephone Cooperative (Docket No. 18-605)

On September 21, 2018, Paul Bunyan Rural Telephone Cooperative (PBT) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, PBT became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent. PBT has received CLEC authority in numerous exchanges. Under Docket No. P432/M-15-433, PBT received ETC status for high cost support from the Rural Broadband Experiment in the census blocks listed in Exhibit 3 of its petition and shown pictorially in Exhibit 1 of the Department's Comments. Under Docket No. P432/M-17-854, PBT received ETC status for Lifeline only in all its CLEC exchanges. PBT's service areas are show in Exhibit 1 of the Department's Comments.

By public notice from the FCC on August 28, 2018, PBT was named as a winning bidder in the CAF II auction, to receive \$1,313,542.60 and serving 315 locations. The CAF II award is given in monthly installments for 10 years (about \$34.75 per location per month for PBT), as long as PBT meets certain build out requirements. The 315 locations are in the census block within the CLEC exchanges of Cass Lake, Park Rapids, Nashwak, Grand Rapids, and Coleraine. The applicable census blocks are attached to the Department's Comments.

Garden Valley Telephone (Docket No. 18-607)

On September 25, 2018, Garden Valley Telephone Company (GVTC) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, Garden Valley became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent. Under Docket No. P409/SA-17-175, Garden Valley received CLEC authority in the exchanges of Mahnomen and Thief River Falls. Under Docket No. P409/M-17-

 Staff Briefing Papers for Docket Nos. P999/CI-18-634; P432/M-18-549; P431/AM-18-601; P432/AM-18-605; P409/AM-18-607; P530/M-18-626; P523/AM-18-630; P515/AM-18-637; P406/AM-18-645; and P522/AM-18-718.

837, Garden Valley received ETC status for Lifeline only in its two CLEC exchanges. Garden Valley's service areas are show in Exhibit 1 of the petition.

By public notice from the FCC on August 28, 2018, Garden Valley was named as a winning bidder in the CAF II auction, to receive \$880,346 and serving 95 locations. The CAF II award is given in monthly installments for 10 years (about \$77.22 per location per month for Garden Valley), as long as Garden Valley meets certain build out requirements. The 95 locations are in the census block within the Mahnomen and Thief River Falls. The applicable census blocks are listed in Exhibit 1 of the petition.


Halstad Telephone Company Docket No. 18-626)

On October 1, 2018, Halstad Telephone Company (Halstad) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, Halstad became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent. Under Docket No. P530/SA-16-84, Halstad received CLEC authority in the exchanges of Crookston and East Grand Forks. Under Docket No. P530/M-17-838, Halstad received ETC status for Lifeline only in its two CLEC exchanges. Halstad's service areas are show in Exhibit 1 of its petition.

By public notice from the FCC on August 28, 2018, Halstad was named as a winning bidder in the CAF II auction, to receive \$19,635.20 and serving 7 locations. The CAF II award is given in monthly installments for 10 years (about \$23.38 per location per month for Halstad), as long as Halstad meets certain build out requirements. The 7 locations are in the census block within the East Grand Forks exchange. The applicable census block is listed in Exhibit 1 of its petition.

Federated Telephone Cooperative (Docket No. 18-630)

On October 3, 2018, Federated Telephone Cooperative (Federated) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, Federated became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent telephone company. In 2010, under Docket No. P523, P5750/PA-10-1212, Federated expanded its service area and received CLEC authority for the exchanges of Morris and Appleton. Through Docket P532/AM-12-119, Federated received ETC status for its exchange in Morris, where Federated received Experimental Broadband Support in a number of

 Staff Briefing Papers for Docket Nos. P999/CI-18-634; P432/M-18-549; P431/AM-18-601; P432/AM-18-605; P409/AM-18-607; P530/M-18-626; P523/AM-18-630; P515/AM-18-637; P406/AM-18-645; and P522/AM-18-718.

Census Blocks. Under Docket No. P532/AM-14-678, Federated filed for and received CLEC authority in the exchange of Graceville. Through Docket No. P532/AM-15-261, Federated received CLEC authority in Beardsley, Clinton, and Ortonville-Big Stone. In 2016, Federated received CLEC authority in the exchanges of Benson, Murdock, Kerkhoven, Pennock, and Sunburg, through Docket No. P532/AM-15-1074.

By public notice from the FCC on August 28, 2018, Federated was named a winning bidder in the CAF II auction, to receive \$1,431,038.80 by serving 808 locations. The CAF II award is given in monthly installments for 10 years (about \$14.76 per location per month for Federated), as long as Federated meets certain build out requirements. The 808 locations are in the census blocks within the Graceville, Beardsley, Clinton, Ortonville-Big Stone, and Benson exchange areas, identified in dark pink on Exhibit 1 of the petition as are the census blocks.


Interstate Telecommunications Cooperative, Inc. (Docket No. 18.637)

On October 3, 2018, Interstate Telecommunications Cooperative, Inc. (Interstate or ITC) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, ITC became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent. Under Docket No. P515/SA-18-680, ITC is requesting CLEC authority in the exchanges of Ivanhoe, Tyler, and the Lincoln County portion of the Minnesota exchange.

By public notice from the FCC on August 28, 2018, ITC was named as a winning bidder in the CAF II auction, to receive \$522,329.60 and serving 209 locations. The CAF II award is given in monthly installments for 10 years (about \$22.02 per location per month for ITC), as long as ITC meets certain build out requirements. The 209 locations are in the census blocks within the proposed CLEC exchanges of Ivanhoe, Tyler and the Lincoln County portion of the Minnesota exchange. Attached to Interstate's petition is a listing of the applicable census blocks which are shown in in blue on map attached to the petition.

Consolidated Telephone Company (Docket No. 18-645)

On October 17, 2018, Consolidated Telephone Company (Consolidated or CTC) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, CTC became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in

 Staff Briefing Papers for Docket Nos. P999/CI-18-634; P432/M-18-549; P431/AM-18-601; P432/AM-18-605; P409/AM-18-607; P530/M-18-626; P523/AM-18-630; P515/AM-18-637; P406/AM-18-645; and P522/AM-18-718.

which it is the incumbent. In 2005, under Docket No. P406/NA-04-1212, CTC received CLEC authority in the exchanges of Brainerd, Little Falls, Nisswa, and Staples. Under Docket No. P406/NA-16-290, CTC received CLEC authority in Aitkin, Bennettville, Browerville, Crosby, Deerwood, and Long Prairie. Other exchanges were included in CTC's application for CLEC authority, but they are not included in this current petition for ETC status.

By public notice from the FCC on August 28, 2018, CTC was named as a winning bidder in the CAF II auction, to receive \$934,933.80 and serving 358 locations. The CAF II award is given in monthly installments for 10 years (about \$21.76 per location per month), as long as CTC meets certain build out requirements. The 358 locations are in the census blocks within the Staples, Browerville, Brainerd, Little Falls, Crosby, Deerwood, and Aitkin exchanges. The census blocks are also listed on page 2 of Exhibit 1 of the petition.

Farmers Mutual Telephone Company (Docket No. 18-718)

On November 20, 2018, Farmers Mutual Telephone Company (Farmers) petitioned for designation as an ETC in certain census blocks where it recently won the CAF II reverse auction and will receive federal funding. As an incumbent local service provider, Farmers became an ETC eligible to receive universal service support on July 28, 1997, in the exchange service areas in which it is the incumbent telephone company. Under Docket No. P522/AM-07-1372, Farmers expanded its service area and received CLEC authority for the Madison exchange. Under Docket P522/AM-09-12, Farmers received CLEC authority for the Dawson exchange. Under Docket P522/SA-12-1187 Farmers received CLEC authority for portions of Ortonville, Montevideo, and Boyd exchanges. Under Docket P522/AM-12-118 Farmers received ETC status for Lifeline only in its Dawson and Madison exchanges.

By public notice from the FCC on August 28, 2018, Farmers was named a winning bidder in the CAF II auction, to receive \$384,991.60 for serving 163 locations. The CAF II award is given in monthly installments for 10 years (about \$17.84 per location per month for Farmers), as long as Farmers meets certain build out requirements. The 163 locations are in census blocks within the Ortonville, Madison, Canby, Dawson, Boyd and Montevideo exchange areas, identified in dark pink on Exhibit 1 of the petition which also lists the census blocks.

IV. Staff Analysis of Petitions Compliance for ETC Designation

The Commission has routinely applied the following evaluation in its assessment of the adequacy of ETC petitions (e.g., see Docket Nos. 17-835; 16-299; 15-65; and 15-691). Staff presents its analysis for the companies below, incorporating Department input.

A. Common carrier requirements for ETC designation

The Department in its initial Comments on each ETC petition (see Analysis section), notes that each company has been operating as an ETC since all ILECs were designated an ETC by Minnesota Rule 7811.1400. Each company's expansion means that service is anticipated to be offered in those areas in the same manner as the ILEC service. The Department notes companies have certified they will offer service on a timely basis to requesting customers where networks pass the customers premises and that it will provide service elsewhere within a reasonable time if service can be provided at reasonable cost by constructing network facilities. (See Department Comments, Analysis Section, Item 1.) Staff believes that each company in this proceeding is a common carrier as defined in 47 U.S.C. §153(11).

B. Supported services required for ETC Designation

Each company affirms in its petition that it already provides voice telephony enumerated in Minn. Rules Part 7812.0600 and 47 CFR § 54.101 (a). This includes: 1) voice grade access to the public switched network, 2) minutes of use for local service at no additional charge to end users, 3) access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, and 4) toll limitation for qualifying low income consumers. (See Department Comments, Analysis Section, Item 2.) Staff believes that for purposes of these ETC petitions, each company offers the supported services required.

C. Other conditions to satisfy other ETC requirements

Service Quality and Consumer Protection.

47 C.F.R. §54.202 (a)(3) requires the companies to demonstrate they will satisfy applicable consumer protection and service quality standards. In its Comments, Analysis Section, Item 5, (Item 6 for Federated, Interstate and Farmers in Docket Nos. 18-630, 18-637, 18-718) the Department indicates satisfaction of consumer protection and service quality standards stating:

[The company] is subject to, and complies with, the Commission's Rules pertaining to service quality and consumer protection. [The company's] tariff has specific provisions outlining the following terms addressing consumer protection issues:



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- Deposit and guarantee requirements
- Customer billing
- Appropriate handling of customer complaints and billing disputes
- Disconnection and notice requirements

The specific provisions in each company's tariff, as well as the Commission's service quality rules by which the companies are bound, will apply throughout the Service Area and assure a high level of service quality and consumer protection. Staff believes that for purposes of these ETC petitions, each company meets the service quality requirements applicable to its ETC designation.

Emergency Readiness

47 C.F.R. §54.202 (a)(2) requires that an applicant for ETC status "Demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

In its Comments, Analysis Section, Item 4, (Item 5 for Federated and Farmers in Docket Nos. 18-630, and 18-718)) the Department indicates that each petitioner satisfies emergency readiness stating:

[The company's] Ability to Remain Functional in Emergency Situations – [The company] stated that its network can and will remain functional in emergencies. The central office serving [the company's] customers is equipped with battery power supply and electrical generators to provide service in the event of a commercial power outage. The interoffice facilities serving the service area are able to reroute traffic. [The Company] complies with the 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).

Staff believes that for purposes of these ETC petitions each company meets the emergency readiness requirements for ETC certification.

Advertising

In its Comments the Department notes that 47 U.S.C § 214(e)(1) requires the companies to "advertise the availability of such services and the charges therefor using media of general

m Staff Briefing Papers for Docket Nos. P999/CI-18-634; P432/M-18-549; P431/AM-18-601; P432/AM-18-605; P409/AM-18-607; P530/M-18-626; P523/AM-18-630; P515/AM-18-637; P406/AM-18-645; and P522/AM-18-718.

distribution.” §54.405 requires companies to “publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.”

In the Department’s analysis of each filing, Item 3 (Item 4 for Federated and Farmers) notes that:

“Advertising for [each company’s] Lifeline services in the expanded areas will follow the same format as its current Lifeline service. [The company’s] web page has a link to the Telephone Assistance Plan and a connection to the Public Utilities Commission website for a downloadable application form for customers. [The company] also plans to advertise at least annually, as well as sending brochures and a letter to the local Social Service offices.”

The Department does not note any inadequacy in the company’s advertising plans. Staff believes that for purposes of these ETC petitions each company’s advertising plan is adequate.

Public Interest

47 C.F.R. §54.202 (b) requires a finding that granting the requested ETC designation is in the public interest. All original ETC designations that are being amended operate in the public interest. Further, these petitions are all directed to enhancing services in areas recognized by the FCC as being underserved and eligible for CAF II funding support. Staff believes that for purposes of these ETC petitions the granting of the requested ETC designation is in the public interest.

D. Service areas conformity to federal and state laws

The proposed service areas are clearly listed in the petitions pending and illustrated in maps attached to each company’s filing. The Department raises no related concerns in its Comments. Staff believes that for purposes of these ETC petitions, and in accord with previous decisions granting ETC status by the Commission, each company’s proposed service areas conform to federal and state laws.

E. Department Concerns regarding VoIP

Staff has not addressed in these briefing papers the Department’s comments related to VoIP service. That issue is briefed in the five ETC dockets being heard before this one and a decision in those dockets will govern how the Commission decides the nine petitions here. If the Commission adopts the position of DEED, then the petitions here may be approved unconditionally.

F. Communications Contingency

Given the importance of ensuring all administrative details are completed for the petitioners' CAF II filings, Staff believes the Commission should delegate authority to the Executive Secretary to issue notices and/or letters if necessary to communicate with the FCC or other entities regarding the petitioners' ETC status. Carriers are required to submit additional information to the FCC by February 25, 2019 in order to secure their funding, including proof of ETC status with the relevant state commission. While the Commission's Order in these dockets will likely fulfill that requirement, out of an abundance of caution it would be helpful to also authorize the Executive Secretary to make any other written communications that may be necessary.

V. Options and Recommendation for ETC Designation

1. Wikstrom Telephone (WikTel), Docket No. 18-549 --WikTel requests Lifetime ETC status in all areas in which WikTel has CLEC authority and for high cost ETC status in the census blocks listed in Exhibit 1 of the Department's November 6, 2018 Comments.
 - A. Approve **(Department recommended in Comments of November 6, 2018)**
 - B. Deny
2. West Central, Docket No. 18-601 – West Central requests ETC status for high cost support in the census blocks listed in Exhibit 1 of the Department's November 29, 2018 Comments.
 - A. Approve **(Department recommended in Comments of November 29, 2018)**
 - B. Deny
3. Paul Bunyan Telephone, Docket No. 18-605 – PBT requests ETC status for high cost support in the census blocks listed in Exhibit 1 of the Department's November 20, 2018 Comments.
 - A. Approve **(Department recommended in Comments of November 20, 2018)**
 - B. Deny
4. Garden Valley Telephone, Docket No. 18-607 -- Garden Valley requests ETC status for high cost support in the census blocks listed in Exhibit 1 of the Department's Comments of November 16, 2018.
 - A. Approve **(Department recommended in Comments of November 16, 2018)**
 - B. Deny

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5. Halstad Telephone, Docket No. 18-626 - Halstad requests ETC status for high cost support in the census blocks listed in Exhibit 1 of the Department's Comments of November 16, 2018.
 - A. Approve **(Department recommended in Comments of November 16, 2018)**
 - B. Deny
6. Federated Telephone, Docket No. 18-630 -- Federated requests Lifeline ETC status in all areas in which Federated has CLEC authority but has not yet received ETC status and for high cost ETC status in the census blocks listed in Exhibit 1 of the Department's Comments of November 16, 2018.
 - A. Approve **(Department recommended in Comments of November 16, 2018)**
 - B. Deny
7. Interstate, Docket No. 18-637 – Interstate requests ETC status for high cost support in the census blocks listed in Exhibit 1 of the Department's Comments of November 27, 2018.
 - A. Approve **(Department recommended in Comments of November 27, 2018)**
 - B. Deny
8. Farmers Mutual, Docket No. 18-718 – Farmers requests Lifetime ETC status in all areas in which Farmers has CLEC authority but has not yet received ETC status and for high cost ETC status in the census blocks listed in Exhibit 1 of the Department's Comments of November 30, 2018.
 - A. Approve **(Department recommended in Comments of November 30, 2018)**
 - B. Deny
9. Consolidated Telephone, Docket No. 18-645 -- CTC requests Lifeline ETC status in the exchanges of Brainerd, Little Falls, Nisswa, Staples, Aitkin, Bennettville, Browerville, Crosby, Deerwood, and Long Prairie. CTC also requests high cost ETC status in the census blocks Listed in Exhibit 1 of the Department's Comments of November 7, 2018.
 - A. Approve **(Department recommended in Comments of November 7, 2018)**
 - B. Deny
10. Delegate authority to the Executive Secretary to issue notices and/or letters to the Federal Communications Commission, or any other entity, if necessary to facilitate communication of the petitioners' ETC status as designated by this Commission.
(Staff Recommended)
11. Require each petitioner to file additional information demonstrating that they will provide telecommunications service in those areas where the petitioner is seeking ETC status. **(Modified after Department Letter)**
12. Other actions the Commission deems appropriate.