

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

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of a Notice to Rural Digital
Opportunity Fund (RDOF) Grant Winners

DOCKET NOS. P-999/CI-21-86 et al.

**REPLY COMMENTS OF THE OFFICE
OF THE ATTORNEY GENERAL**

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INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits these Reply Comments to respond to the Rural Digital Opportunity Fund (“RDOF”) Phase I eligible telecommunications carrier (“ETC”) comments filed by other parties, provide clarifications on its own comments, make a ministerial revision to one of its attachments, and restate its proposed RDOF Phase I ETC obligations. Assuming the Commission adopts the proposed RDOF Phase I ETC obligations from these Reply Comments, the OAG continues to recommend ETC status for most of the companies that seek it,¹ including LTD Broadband LLC. Because Consolidated Communications of Minnesota Company is already an ETC in each of the geographic areas of its winning RDOF Phase I bids, the OAG withdraws its objection to the company’s RDOF Phase I ETC status.

¹ The OAG does not make a recommendation for Windstream Services, LLC (“Windstream”) because the company did not file its petition until April 6, 2021, over 40 days after the initial filing deadline and only six days before the reply comment deadline. *See generally In the Matter of the Petition of Windstream Communications, LLC for Designation as Eligible Telecommunications Carrier*, Docket No. P-6518/M-21-248, Petition for Designation as an Eligible Telecommunications Carrier (Apr. 6, 2021). The OAG is concerned about the company’s failure to file by the initial comment filing deadline. If the Commission approves Windstream’s petition, it should make clear that future filings must be submitted on time.

The OAG does not make a recommendation for Fond du Lac Communications, Inc. To the OAG’s knowledge this company has not filed an ETC petition with the Commission to date.

The Commission does not need to make an ETC decision for Aspire Networks 2, LLC (“Aspire”). Aspire withdrew its petition for ETC designation on March 1, 2021. *See generally In the Matter of Petition of Aspire Networks 2, LLC for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Support*, Docket No. P-7050/M-21-32, Withdrawal Letter (Mar. 1, 2021). The Commission’s Executive Secretary approved the withdrawal on March 17, 2021. Docket No. P-7050/M-21-32, NOTICE AND ORDER APPROVING PETITION TO WITHDRAW FILING at 1 (Mar. 17, 2021).

BACKGROUND

On February 2, 2021, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Filing Requirement and Comment Deadlines for RDOF Grant Winners (“Notice”).² The Notice required companies that seek a Minnesota ETC designation or expansion to submit petitions to the Commission by February 19, 2021.³ The Notice also requests comments on whether the Commission should approve the ETC designation and expansion requests, and whether it should take any other actions in this matter.⁴ The Commission must make its ETC designation and expansion decisions no later than June 7, 2021.⁵

The OAG, the Minnesota Department of Commerce (“Department”), the Minnesota Telecom Alliance (“MTA”), and the Paul Bunyan Rural Telephone Cooperative (“PBRTC”) filed initial comments. Starlink Services, LLC (“Starlink”) filed reply comments.

The initial comments of the OAG and the Department focused on the Commission’s ETC jurisdiction and proposed conditions for the ETC designation and expansion requests.⁶ The initial comments of the MTA and the PBRTC focused on LTD Broadband LLC’s (“LTD”) Petition for Expansion as an Eligible Telecommunications Carrier.⁷ Whereas the OAG and the Department recommend approval of LTD’s request for ETC expansion, subject to conditions,⁸ the MTA and the PBRTC oppose Commission approval of LTD’s ETC expansion request.⁹ While the PBRTC is open to approval of LTD’s ETC expansion request if approval is “conditioned on LTD’s compliance with specific and enforceable consumer protection and service quality standards, and the provision of service to low-income consumers,”¹⁰ the MTA asks the Commission not only to deny LTD’s expansion request but to revoke the company’s existing ETC designation.¹¹

The reply comments of Starlink focused on the ETC obligations proposed by the OAG and the Department. Starlink claims that the Commission lacks jurisdiction to impose ETC obligations

² *In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners*, Docket No. P-999/CI-21-86, Notice of Filing Requirement and Comment Deadlines for RDOF Grant Winners (Feb. 2, 2021) (“Notice”).

³ *Id.* at 1. The Notice informed companies that failure to timely file their ETC petitions could result in the Commission being unable to determine ETC status by the FCC-mandated deadline. *Id.*

⁴ *Id.*

⁵ See Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021, AU Docket Nos. 20-34 et al., Public Notice, DA 20-1422, paras. 17, 36 (Dec. 7, 2020) (directing RDOF Phase I applicants to obtain their ETC designations and submit documentation prior to 6 p m. ET on Monday, June 7, 2021) (“Winning Bidder Announcement”).

⁶ See generally Docket No. P-999/CI-21-86, Comments of the Office of the Attorney General (Mar. 26, 2021) (“OAG Comments”) and Comments of the Minnesota Department of Commerce (Mar. 26, 2021) (“Department Comments”).

⁷ See generally Docket No. P-999/CI-21-86, Comments of the Minnesota Telecom Alliance (Mar. 26, 2021) (“MTA Comments”) and Comments of the Paul Bunyan Rural Telephone Cooperative (Mar. 26, 2021) (“PBRTC Comments”).

⁸ See OAG Comments at 1, 22 (recommending approval with conditions); Department Comments at 17 (recommending approval with conditions).

⁹ MTA Comments at 1, 10-11; PBRTC Comments at 2, 12.

¹⁰ PBRTC Comments at 12.

¹¹ MTA Comments at 10.

on broadband Internet access and interconnected VoIP providers because broadband Internet access and interconnected VoIP services are information services.¹²

The OAG's Initial Comments also included an Attachment A that listed the individual Commission dockets for the companies seeking RDOF Phase I ETC designation and/or expansion in Minnesota. The OAG inadvertently used the wrong prefix for the numbers contained in the "PUC Docket No." column of that attachment.¹³ Included with these Reply Comments is a revised Attachment A containing the modified docket numbers.

ANALYSIS

I. THE COMMISSION SHOULD GRANT LTD'S RDOF PHASE I ETC EXPANSION REQUEST BUT ADOPT THE SAME ETC OBLIGATIONS FOR LTD THAT THE COMMISSION ADOPTS FOR ALL OTHER RDOF ETCs AND BE PREPARED TO REVOKE THE ETC DESIGNATION OF ANY COMPANY FOR NON-COMPLIANCE.

A framework exists for the Commission to evaluate the ETC designation and expansion requests of broadband Internet access and interconnected VoIP providers but that framework does not include the Minnesota Administrative Rules for telecommunications carriers referenced by the MTA. The proper framework includes federal Universal Service statutes, rules, orders, and RDOF Phase I auction materials. The framework also includes ETC criteria that the Commission has adopted in its prior orders, and recommended ETC criteria from the current proceeding. This framework is discussed in section I.A below.

Based on inapplicable federal and state cases, Starlink claims that the Commission lacks jurisdiction to impose ETC obligations on broadband Internet access and interconnected VoIP providers because they provide information services. As detailed extensively in the OAG's Initial Comments, and as addressed again here, the Commission has the authority to impose conditions on all ETCs, including those that provide broadband Internet access and interconnected VoIP services. The FCC could not have been clearer about the Commission's jurisdiction and no party presented evidence in this proceeding to disprove the Commission's authority. The Commission's jurisdiction over broadband Internet access and interconnected VoIP provider ETCs is discussed in section I.B below.

At least one broadband Internet access and interconnected VoIP provider in this docket has outright rejected the Commission's authority to monitor and enforce ETC conduct. If an ETC is unwilling to abide by the FCC-established federal-state partnership and accept the Commission's authority to monitor and enforce federal Universal Service ETC conduct, there can be no confidence that the ETC is advancing the federal Universal Service goals or using the RDOF Phase I support for its intended purpose. Although there are a few remedies available to the Commission for ETC non-compliance, if there is a sufficient evidentiary basis, the Commission must be prepared to deny and/or revoke ETC designations for companies that will not recognize its

¹² See generally *In the Matter of the Application of Starlink Services, LLC for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Rural Digital Opportunities Fund Support*, Docket No. P-7047/M-21-26, Petitioner's Reply Comments (Apr. 5, 2021) ("Starlink Reply Comments").

¹³ See OAG Comments at Attach. A (using a "PR" prefix for each Commission docket number).

authority or that refuse to comply with its ETC requirements. This is true for *all ETCs*, not just broadband Internet access and interconnected VoIP ETCs. An overview of the Commission's ETC revocation authority and some options for the Commission to remedy ETC non-compliance are discussed in section I.C below.

The OAG is agnostic about which companies the FCC selects to receive RDOF Phase I support as long as they pass the FCC's detailed evaluation process and comply with the FCC's, and the Commission's, ETC obligations. In this case, however, claims that LTD cannot fulfill its RDOF Phase I requirements are speculative and based on incomplete information. The FCC has more technical and financial data about LTD than the OAG does, and the FCC is still reviewing LTD's RDOF Phase I long-form application. A denial of LTD's ETC expansion request at this time would prematurely delay the flow of broadband deployment dollars to Minnesota. Section I.D of the OAG's Reply Comments discuss in detail why the OAG continues to recommend approval of LTD's petition for ETC expansion, as long as the Commission adopts the same ETC obligations for LTD that it adopts for the other RDOF Phase I petitioners.

A. The Commission Evaluates Minnesota Non-Certificated ETC Designation Requests Pursuant to Federal Universal Service Statutes, Rules, Orders, Auction Materials, and Criteria Adopted in Its Own ETC Orders.

The OAG agrees with the MTA that the Commission evaluates ETC designation and expansion requests using, among other things, consumer protection, the Lifeline advertising, and public interest criteria.¹⁴ However, the Minnesota Administrative Rules cited by the MTA do not apply to Minnesota non-certificated companies like LTD. Instead, the Commission evaluates the ETC designation and expansion requests of Minnesota non-certificated companies using the criteria set forth in sections 214 and 254 of the Communications Act of 1934, as amended (the "Act"), the FCC's federal Universal Service rules, codified at 47 C.F.R. 54, the FCC's orders, and the applicable FCC auction materials. At the state-level, the Commission evaluates ETC designation and expansion requests from Minnesota non-certificated companies using ETC criteria adopted in prior Commission orders, and proposed ETC criteria from the current proceeding. This ETC designation framework is discussed in more detail below.

1. The OAG and the MTA agree that the Commission's ETC evaluation framework for broadband Internet access and interconnected VoIP providers includes sections 214 and 254 of the Act.

Sections 214 and 254 of the Act govern the designation of ETCs by states. Section 214(e)(1) requires a common carrier to obtain an ETC designation as a prerequisite to the receipt of federal Universal Service support;¹⁵ to offer the services that are supported by the federal Universal Service support mechanisms under section 254(c) of the Act, either using its own facilities or a combination of its own facilities and the resale of another carrier's services;¹⁶ and to

¹⁴ MTA Comments at 2.

¹⁵ 47 U.S.C. § 214(e)(1).

¹⁶ *Id.* § 214(e)(1)(A).

advertise the availability of the services and their corresponding charges using media of general distribution.¹⁷

Section 214(e)(2) of the Act gives a state commission the authority, on its own motion or upon request, to designate a common carrier as an ETC if the common carrier meets the requirements of Section 214(e)(1) discussed above.¹⁸ In doing so, the state commission must consider whether the designation is in the public interest:

Upon request and *consistent with the public interest, convenience, and necessity*, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an [ETC] for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of [section 214(e)(1)]. Before designating an additional [ETC] for an area served by a rural telephone company, the State commission shall find that the designation is *in the public interest*.¹⁹

Section 254(b) of the Act articulates the principles the FCC must use to preserve and advance federal Universal Service, including providing access to information services like broadband Internet access services and technologically-neutral voice telephony services like interconnected VoIP services:

Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and *information services*, including interexchange services and advanced telecommunications and *information services*, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.²⁰

The FCC may adopt any other principles it determines are “necessary and appropriate for the *protection of the public interest, convenience, and necessity*” and that are consistent with Chapter 254 of the Act.²¹

Section 254(c) of the Act gives the FCC the authority to redefine telecommunications services to “account for advances in telecommunications and *information technologies* and

¹⁷ *Id.* § 214(e)(1)(B).

¹⁸ *Id.* § 214(e)(2).

¹⁹ *Id.* (emphasis added).

²⁰ 47 U.S.C. § 254(b)(3) (emphasis added). In its *2011 Transformation Order*, the FCC included interconnected VoIP in its technology-neutral “voice telephony” definition. See *In the Matter of Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, paras. 77-78 (2011) (including voice services provided over broadband networks in the definition of voice telephony services) (“*2011 Transformation Order*”).

²¹ *Id.* § 254(b)(7) (emphasis added).

services.”²² When modifying the telecommunications services that are eligible for federal Universal Service support, the FCC considers, among other things “the extent to which such telecommunications services— . . . have, through the operation of market choices by customers, been subscribed to by a substantial majority of residential customers; [and] . . . are *consistent with the public interest, convenience, and necessity*.”²³

Section 254(e) of the Act mandates that a carrier that receives federal Universal Service support use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended and to achieve federal Universal Service goals.²⁴ To ensure that the support is used properly and the federal Universal Service goals are achieved, “[a] State may adopt regulations not inconsistent with the [FCC]’s rules to preserve and advance universal service.”²⁵

2. The OAG and the MTA agree that the Commission’s ETC evaluation framework for broadband Internet access and interconnected VoIP providers includes the FCC’s federal Universal Service rules.

The FCC’s federal Universal Service rules are codified at 47 C.F.R. § 54. The rules reiterate that a carrier that receives federal Universal Service support must use the support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended.²⁶ This includes use of the support for “investments in plant that can, either as built or with the addition of plant elements, when available, provide access to advanced telecommunications and *information services*.”²⁷

The rules also require an ETC to provide the services for which it receives federal Universal Service support throughout its service area.²⁸ The rules further require that, with exceptions for certain price-cap carriers, an ETC must offer the supported services using either its own facilities, or a combination of its own facilities and the resale of another carrier’s services.²⁹ An ETC may not offer federal Universal Service-supported services exclusively through the resale of another carrier’s services.³⁰ An ETC must advertise the availability of the services and their corresponding charges using media of general distribution.³¹

The FCC’s rules require an ETC that receives federal Universal Service High Cost Program (“High Cost Program” or “High Cost”) support—like RDOF Phase I support—to provide voice telephony services that include:

²² *Id.* § 254(c)(1) (emphasis added). This section also gives the FCC the authority to modify the definition of the services that are eligible to receive federal Universal Service support based on recommendations from the Joint Board on Universal Service. *Id.* § 254(c)(2).

²³ *Id.* § 254(c)(1)(B), (D) (emphasis added).

²⁴ *Id.* § 254(e).

²⁵ *Id.* § 254(f).

²⁶ 47 C.F.R. § 54.7(a).

²⁷ *Id.* § 54.7(b) (emphasis added).

²⁸ *Id.* § 54.201(d).

²⁹ *Id.*

³⁰ *Id.* § 54.201(i).

³¹ *Id.* § 54.201(d).

- Voice grade access to the public switched network *or its functional equivalent*;
- Minutes of use for local service provided at no additional charge;
- Access to emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government has implemented such systems; and
- Toll limitation services to qualifying low-income consumers.³²

Certain High Cost Program support recipients (those not receiving Connect America Fund Phase I frozen support) must offer broadband Internet access services in the areas where they receive High Cost support.³³ All High Cost Program support recipients must provide federal Universal Service Lifeline Program (“Lifeline Program” or “Lifeline”) service.³⁴

Additional federal Universal Service High Cost Program and Lifeline Program rules are set forth in subparts D (Universal Service Support for High Cost Areas) and E (Universal Service Support for Low-Income Consumers) of 47 C.F.R. 54.³⁵

3. The Commission’s ETC evaluation framework for broadband Internet access and interconnected VoIP providers includes FCC orders, and program- and auction- specific FCC materials.

Although the Act and the FCC’s federal Universal Service rules reference telecommunications carriers, the FCC has extended federal Universal Service support to other types of service providers through its orders, and program- and auction-specific materials. For example, in 2011, the FCC expanded federal Universal Service support to include broadband networks capable of providing both voice and advanced services.³⁶ In doing so, it made clear that interconnected VoIP providers, and other providers of voice services over broadband networks, are subject to the FCC’s authority, regardless of their regulatory classification.³⁷

The same holds true for RDOF. From the start of the RDOF process, the FCC was clear that the auction was open to any applicant who could meet its short-form legal, technical, and financial requirements.³⁸ This includes applicants with less than two years of operational

³² *Id.* § 54.101(a), (b) (emphasis added).

³³ *Id.* § 54.101(c).

³⁴ *See id.* § 54.101(d) (requiring all ETCs to comply with the Lifeline portion of the FCC’s rules).

³⁵ *See generally id.* §§ 54.302-54.321 (High Cost) and §§ 54.400-54.423 (Lifeline).

³⁶ *2011 Transformation Order*, paras. 1, 15-16, 45.

³⁷ *See id.*, para. 63 (explaining that the FCC’s federal Universal Service authority does not depend on whether interconnected VoIP services are telecommunications services or information services), n.67 (explaining that section 254 of the Act gives the FCC authority over interconnected VoIP services regardless of whether they are telecommunications services or information services), paras. 66-73 (establishing the FCC’s authority to fund the deployment of broadband networks and citing the Notice of Inquiry in the *National Broadband Plan for Our Future* for the proposition that ‘advanced telecommunications capability’ *includes broadband Internet access*).

³⁸ Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904, AU Docket Nos. 20-34 et al., Public Notice, FCC 20-77, paras. 14, 27 (2020) (“Auction Notice”).

experience in the provision of voice, broadband, and/or electric distribution or transmission services,³⁹ and providers of nascent technologies.⁴⁰ However, the FCC explicitly notified *all* RDOF participants that they are subject to its authority and governed by its federal Universal Service orders, rules, and other materials,

The terms contained in the [FCC]’s rules, relevant orders, and public notices are generally applicable to all bidders. The [FCC] may amend or supplement the information contained in its public notices at any time and will issue public notices to convey any new or supplemental information to interested parties. . . . It is the responsibility of all applicants to remain current with all [FCC] rules and with all public notices pertaining to [the RDOF] auction.⁴¹

4. The Commission’s ETC evaluation framework for broadband Internet access and interconnected VoIP providers includes the criteria from its prior orders and recommended criteria from the current proceeding.

The Minnesota Administrative Rules discussed by the MTA are *not* used to evaluate the ETC designation requests of Minnesota non-certified companies like LTD.⁴² Instead, the ETC designation requests of Minnesota non-certificated companies are evaluated using the criteria set forth in the Commission’s prior ETC orders, and recommended criteria in the current proceeding.⁴³ If the Commission wishes to adopt consumer protection and service quality standards for a Minnesota non-certificated company, it must do so explicitly, as part of the company’s ETC designation or expansion order.⁴⁴ This is because Minnesota non-certified companies are not otherwise subject to the Commission’s consumer protection and service quality rules.⁴⁵

³⁹ *Id.* at paras., 49, 55.

⁴⁰ *See id.*, para. 117 (rejecting arguments that nascent technologies should be categorically banned from receiving RDOF support).

⁴¹ *Id.*, para. 8. *See also id.*, paras. 7 (directing RDOF applicants to familiarize themselves with the FCC’s general, High Cost, and RDOF rules), 14 (requiring auction participants to comply with the provisions of the public notice and applicable FCC rules), 117 (citing 47 C.F.R. § 54.7, noting that all ETCs are required to use support for its intended purpose, and explaining that all applicants are required to build and operate facilities in accordance with RDOF auction obligations and the FCC’s rules generally), 137 (directing all RDOF applicants to familiarize themselves with the FCC’s ETC requirements and to conduct due diligence to ensure they can meet the requirements).

⁴² MTA lists Minn. R. 7811.1400 (for “Small Local Providers”) and Minn. R. 7812.1400 (for “Large Local Providers”) as the applicable rules to evaluate LTD’s ETC designation petition. MTA Comments at 2-3. These rules only apply to companies that are regulated pursuant to a Commission-issued certificate of authority. *See* Minn. R. 7811.0500 (listing the general certification requirements for small local providers); Minn. R. 7812.0500 (listing the general certification requirements for large local providers).

⁴³ *See, e.g., In the Matter of Assist Wireless’s Petition for ETC Designation in Minnesota*, Docket No. P-6978/M-17-213, ORDER GRANTING PETITION FOR ETC WITH CONDITIONS at 4-7 (Nov. 15, 2017) (“*Assist Order*”); Docket No. P-6978/M-17-213, Comments of the Minnesota Department of Commerce at 1 (Aug. 14, 2017).

⁴⁴ *See, e.g., Assist Order* at 4-7.

⁴⁵ For example, Minn. Stat. § 237 (Telecommunications) and the Commission’s consumer protection-related rules in Minn. R. 7810 (Telephone Utilities) do not apply to mobile wireless service providers. Instead, mobile wireless service providers commit to comply with the consumer protection and service quality standards in the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service. *See Assist Order* at 6 (explicitly requiring the company to include a commitment to follow the CTIA’s Consumer Code for Wireless Service in its informational tariff).

Similarly, the statutory burden of proof discussed by the MTA does not apply to Minnesota non-certificated companies.⁴⁶ In fact, the statute cited by the MTA does not apply in this situation at all. Rather, it is only applicable in complaint proceedings specifically brought under Minn. Stat. § 237.74 (Regulation of Telecommunications Carrier) “[u]pon a complaint made against a *telecommunications carrier* by a *telephone company*, by another *telecommunications carrier*, by the governing body of a political subdivision, or by no fewer than five percent or 100, whichever is the lesser number, of the subscribers or spouses of subscribers of the particular *telecommunications carrier*, that any of the rates, tolls, tariffs or price lists, charges, or schedules is in any respect unjustly discriminatory, or that any service is inadequate or cannot be obtained”⁴⁷

Any ETC evaluation criteria the Commission adopts should be transparent and as consistent as possible across all ETCs.⁴⁸

B. The Commission has the Authority to Impose ETC Obligations on Broadband Internet Access and Interconnected VoIP Providers Like LTD.

The OAG agrees with the PBRTC that the Commission should, “at a minimum, condition any expansion of LTD’s ETC designation on LTD’s commitment to specific and enforceable consumer protection and service-level standards.”⁴⁹ As discussed in the OAG’s Initial Comments, the Commission has the authority to impose ETC obligations on broadband Internet access and interconnected VoIP providers like LTD.⁵⁰ Although the OAG’s Initial Comments focused on interconnected VoIP providers, its federal-state ETC partnership reasoning extends to broadband Internet access providers as well.⁵¹ To reiterate the main points from the OAG’s Initial Comments:

- Federal Universal Service support is *federal* money;⁵²
- Interconnected VoIP has not been classified as either a telecommunications service or an information service by the FCC;⁵³
- The FCC has made clear that broadband Internet access and Interconnected VoIP providers are governed by the FCC’s ETC regulations regardless of whether they provide telecommunications services or information services;⁵⁴

⁴⁶ See Minn. Stat. § 237.74, subd. 4(d) (referencing the burden of proof that applies to telecommunications carriers).

⁴⁷ See *id.*, subd. 4(a), (b) (emphasis added).

⁴⁸ Minn. Stat. § 237.435 (“In determining whether to provide the annual certification of any eligible telecommunications carrier for continued receipt of federal universal service funding, the commission shall apply the same standards and criteria to all eligible telecommunications carriers.”).

⁴⁹ PBRTC Comments at 10. See also *id.* at 8 (explaining that the Commission has the authority and responsibility to determine whether LTD’s ETC designation is in the public interest), 12 (proposing that LTD’s expansion be conditioned on compliance with “specific and enforceable consumer protection and service quality standards, and the provision of service to low-income consumers”).

⁵⁰ OAG Comments at 8-13.

⁵¹ See *supra* at section I, subsection A.3.

⁵² OAG Comments at 2-3, 12.

⁵³ *Id.* at 12 & n.80.

⁵⁴ *Id.* at 12 & n.81.

- The FCC has expressly maintained the federal-state ETC partnership even as the services supported by the federal High Cost Program—i.e., the Connect America Fund (“CAF”) and the RDOF—have evolved to include broadband Internet access and interconnected VoIP services;⁵⁵
- The Eighth Circuit *Charter Order* is inapplicable in the federal Universal Service context because Congress explicitly delegated ETC designation, monitoring, and enforcement authority to the Commission as a state enforcer, and the Commission’s exercise of that authority is not state regulation;⁵⁶ and
- There is no federal policy of nonregulation when it comes to the designation and oversight of ETCs.⁵⁷

1. The federal *Computer Inquiries* line of cases does not divest the Commission of its authority to impose ETC designation and expansion obligations.

Starlink’s reply comments attempt to divest the Commission of its authority to impose ETC designation and expansion obligations, but its arguments fail.

To start, the proceedings and cases cited by Starlink to support its claim that broadband Internet access providers are exempt from ETC regulation are cases from another regulatory context altogether. Specifically, the *Computer Inquiries* line of cases cited by Starlink determined that, to spur competition and innovation, broadband Internet access services should be classified as information services and should not be subject to mandatory Title II regulation under the Act.⁵⁸ Instead, they should enjoy “light touch” Title I regulation because they offer “more than mere transmission.”⁵⁹

These cases, which resolved the question of Title I versus Title II regulation for broadband Internet access services, have nothing to do with the federal Universal Service ETC authority that is at issue here. In fact, the *In the Matter of Restoring Internet Freedom* order relied on by Starlink clarifies as much, explaining that the federal-state partnership still governs federal Universal Service ETCs:

Although we preempt state and local laws that interfere with the federal deregulatory policy restored in this order, we do not disturb or displace the states’ traditional role in generally policing such matters as fraud, taxation, and general commercial dealings, so long as the administration of such general state laws does not interfere with federal regulatory objectives. Indeed, the continued

⁵⁵ *Id.* at 12-13.

⁵⁶ *Id.* at 11-12.

⁵⁷ *Id.* at 12.

⁵⁸ *In the Matter of Restoring Internet Freedom*, WC Docket No. 17-108, Declaratory Ruling, Report and Order, and Order, FCC 17-166, paras. 2, 6-20 (2018).

⁵⁹ *Id.*

applicability of these general state laws is one of the considerations that persuade us that [Internet Service Provider] conduct regulation is unnecessary here. *Nor do we deprive the states of any functions expressly reserved to them under the Act, such as responsibility for designating eligible telecommunications carriers under section 214(e); . . . or authority to adopt state universal service policies not inconsistent with the [FCC]’s rules under section 254. We appreciate the many important functions served by our state and local partners, and we fully expect that the states will “continue to play their vital role in protecting consumers from fraud, enforcing fair business practices, for example, in advertising and billing, and generally responding to consumer inquiries and complaints” within the framework of this order.*⁶⁰

2. The Charter Order does not divest the Commission of its authority to impose ETC designation and expansion obligations.

Starlink’s state line of cases suffers from the same fatal flaw as its federal ones; they have nothing to do with federal Universal Service. Instead, these cases address the question of whether the “Spectrum Voice” service offered by a Charter Communications Services, Inc. Minnesota subsidiary is an information service exempt from Title II-style state-level telecommunications regulation.⁶¹

As with the *Computer Inquiries* cases, the Eighth Circuit classified interconnected VoIP as an information service to remove it from broader state telecommunications regulation;⁶² not to determine a state’s federal Universal Service ETC authority.⁶³ The *Charter Order* is inapplicable here and does not restrict the Commission’s ability to establish consumer protection and service quality standards for broadband Internet access and interconnected VoIP ETCs.⁶⁴ Rather, these functions have been explicitly delegated to the Commission by Congress and reinforced through the FCC’s reliance on the federal-state partnership to preserve and advance federal Universal Service.

Even if the *Charter Order* could be read to extend to federal Universal Service ETC designation and expansion, the FCC’s *Fifth Report and Order*, issued *after* the *Charter Order*, rejected the precise preemption and jurisdiction arguments Starlink raises here. Specifically, the

⁶⁰ *Id.*, para. 196.

⁶¹ See *Charter Advanced Servs. v. Lange*, 259 F. Supp. 3d 980, 985-86 (D. Minn. 2017) (“The fount of regulatory authority, in this matter, is the Telecommunications Act of 1996. By its enactment, Congress ‘unquestionably’ took ‘the regulation of *local telecommunications competition* away from the States’ with respect to matters covered by the Act.”) (emphasis added) (citation omitted), 991 (“[T]he Court concludes that Charter Advanced’s Spectrum Voice offering [is] an ‘information service’ Accordingly, *state regulation of Spectrum Voice* is preempted and impermissible.”) (emphasis added).

⁶² See generally *Charter Advanced Servs. v. Lange*, 903 F.3d 715 (8th Cir. 2018) (“*Charter Order*”). See also OAG Comments at 11-13.

⁶³ See generally *Charter Order* (containing no discussion of federal Universal Service or the regulation of ETCs).

⁶⁴ Starlink Reply Comments at 5-7 (arguing that the Commission should reject RDOF Phase I ETC conditions for broadband Internet access and interconnected VoIP providers because of the Commission’s order regarding LTD’s CAF Phase II support).

Fifth Report and Order rejects Starlink’s assertion that the states’ role in the federal-state ETC partnership has been preempted for broadband Internet access providers because of the *Restoring Internet Freedom Order*. The *Fifth Report and Order*, which eliminated a Lifeline Broadband Provider ETC type and restored the states’ traditional role in the ETC process,⁶⁵ explains at length that the Commission’s role in the federal-state partnership remains intact:

- “. . . . In 2000, the [FCC] reviewed the text and legislative history of section 214(e) and concluded that ‘state commissions have primary responsibility for the designation of [ETCs] under section 214(e)(2).’ In 2005, it affirmed this conclusion and again noted that section 214(e)(2) ‘provides state commissions with the primary responsibility for performing ETC designations.’ In 2011, the [FCC] again found that states have ‘primary jurisdiction to designate ETCs,’ and that its role was to ‘designate[] ETCs where states lack jurisdiction.’ Even the *2015 Lifeline Order and Notice* recognized that ‘[s]ection 214(e)(2) assigns primary responsibility for designating ETCs to the states.’”⁶⁶
- “[T]he *2016 Lifeline Order*’s decision to preempt states from designating Lifeline Broadband Provider ETCs was unlawful. *This preemption rested largely on the ground that allowing state commissions to designate those ETCs would hinder the goals of federal universal service and dampen broadband competition.* [The FCC] disagree[s] with both justifications and find[s] that this preemption analysis was otherwise flawed in several respects.”⁶⁷
- “As an initial matter, no conflict with federal law justifies preemption. . . . [W]hile Congress established the goal of promoting broadband deployment in section 254(b), it also placed the primary responsibility for designating ETCs on state commissions in section 214(e)(2). *Read together, these provisions establish that section 254(b) seeks to promote broadband deployment to the extent possible within the state-focused designation process set forth in section 214.* Disregarding section 214(e)(2), the *2016 Lifeline Order* found a purported ‘conflict[]’ between state designation of Lifeline Broadband Providers and the [FCC]’s implementation of the goals of section 254(b). But this ‘conflict’ assumes, without explanation, that the relevant goal under section 254(b) is promoting broadband deployment in the abstract, unconstrained by the state-focused designation process mandated by section 214. [The FCC] find[s] that no such conflict exists, and that *the principles listed in section 254(b) may not lawfully be construed in a manner that would ignore or override other statutory provisions, including the state-focused framework of section 214(e).*”⁶⁸
- “Section 706 does not furnish a basis for the preemption of states’ designation authority. . . . In contrast to sections 214(e)(2) and 214(e)(6), which expressly confer

⁶⁵ See generally *In the Matter of Bridging the Digital Divide for Low-Income Consumers* et al., WC Docket Nos. 17-287 et al., *Fifth Report and Order*, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (2019) (“*Fifth Report and Order*”).

⁶⁶ *Id.*, para. 36 (citations omitted).

⁶⁷ *Id.*, para. 47 (emphasis added and citations omitted).

⁶⁸ *Id.*, para. 48 (emphasis added and citations omitted).

designation authority, section 706 merely directs the [FCC] and states to encourage the deployment of broadband services and generally instructs the [FCC] to take action to accelerate deployment if it finds advanced telecommunications capability is not being deployed in a reasonable and timely fashion. *The specific grant of designation authority to states prevails over section 706’s general language regarding broadband deployment.*”⁶⁹

- “[The FCC] find[s] that *the state designation process furthers federal universal service goals—it does not ‘thwart’ them.* . . . [T]he traditional state designation role better serves section 254(b)’s policy goals by *facilitating thorough state reviews of carriers seeking ETC designations, as well as state monitoring of carriers who have received ETC designations.* This helps prevent, detect, and curb waste, fraud, and abuse in the program, which in turn promotes efficient and responsible use of limited program funds.”⁷⁰
- “[The FCC] note[s] that [its] reversal of the preemption decision in the *2016 Lifeline Order* in no way conflicts with the [FCC]’s determination in *other contexts*—such as in the *Restoring Internet Freedom Order*—that broadband Internet access service is jurisdictionally interstate and that inconsistent state and local regulation may be preempted on that ground. *Several commenters argue otherwise, relying on the premise that states’ ETC designation authority under section 214(e)(2) can be preempted simply because of the interstate nature of broadband Internet access service. This argument ignores the fact that section 214 itself expressly confers on state commissions the primary responsibility to designate carriers that are subject to state jurisdiction. It also ignores . . . the absence of a conflict justifying preemption.* [The FCC] therefore find[s] no inconsistency between [its] *reversal of the unlawful preemption* in the *2016 Lifeline Order* and the [FCC]’s preemption of inconsistent state and local regulation of broadband Internet access services *in other contexts.*”⁷¹
- “The traditional framework . . . has the advantage of providing strong state and federal oversight of ETCs. *The cooperative federalism that exists under the traditional framework provides states certainty with respect to their role in monitoring and enforcing the activities of ETCs.* This in turn encourages states to devote staff and resources to thoroughly reviewing ETC designation applications and policing ETCs, providing a stronger system for promoting the efficient use of universal service funds, . . . and reducing waste, fraud, and abuse than if states did not serve these critical roles. *States have a record of more than twenty years of sound performance in their statutory role and monitoring the ETCs they designate. As NARUC has noted, states have been ‘crucial’ in ‘policing the federal fund to eliminate bad actors.’*”⁷²

⁶⁹ *Id.*, para. 50 (emphasis added and citations omitted).

⁷⁰ *Id.*, para. 52 (emphasis added and citations omitted).

⁷¹ *Id.*, para. 53 (emphasis added and citations omitted).

⁷² *Id.*, para. 58 (emphasis added and citations omitted).

The FCC could not be clearer. Broadband Internet access providers are subject to federal Universal Service regulations, including those that govern the federal-state ETC partnership and confer ETC designation, monitoring, and enforcement authority on state commissions.

3. The Commission is authorized to adopt the OAG’s proposed ETC obligations and apply them to Minnesota non-certificated broadband Internet access and interconnected VoIP providers because the proposed obligations preserve and advance federal Universal Service.

With its clear regulatory authority, the Commission is authorized to adopt ETC obligations for Minnesota non-certificated broadband Internet access and interconnected VoIP providers that will preserve and advance federal Universal Service. One broadband Internet access and interconnected VoIP provider, Starlink, suggests that the OAG’s proposed ETC obligations would be “burdensome and unnecessary legacy state telecommunications regulation[.]”⁷³ This is not true. While some of the ETC obligations proposed by the Department and supported by the OAG are codified in the consumer protection and service quality regulations for Minnesota telecommunications providers, the proposed obligations are still appropriate in the ETC context. It is absurd to suggest that the Commission create an entirely new consumer protection and service quality framework specifically for Minnesota non-certificated broadband Internet access and interconnected VoIP ETCs when the requirements it would impose already exist in Minnesota statutes and rules and can be incorporated through Commission orders.

Moreover, most of the OAG’s recommended RDOF Phase I ETC obligations simply require petitioners to acknowledge the existence of, and agree to comply with, existing FCC regulations that are applicable to their receipt of RDOF Phase I support.⁷⁴ It is surprising and discouraging to see Starlink push back on these basic requirements. Outside of supporting the Department’s proposed consumer protection and service quality recommendations,⁷⁵ the OAG proposed only three additional ETC obligations for RDOF Phase I support recipients: 1) develop a consumer service inquiry process; 2) provide network buildout updates for the first two years of RDOF Phase I support; and 3) monitor open Commission ETC-related proceedings for additional obligations that may arise after the receipt of an RDOF Phase I ETC designation.⁷⁶ This hardly amounts to the imposition of “burdensome and unnecessary legacy state telecommunications regulations” as argued by Starlink.⁷⁷

C. The Commission Must be Prepared to Deny and Revoke ETC Designations for Companies That Will Not Recognize its Authority or that Refuse to Comply with its ETC Requirements.

Having established that the Commission has the authority to require *all* ETCs to comply with the ETC requirements it establishes to preserve and advance federal Universal Service,⁷⁸ the

⁷³ Starlink Reply Comments at 1.

⁷⁴ OAG Comments at 22.

⁷⁵ *Id.* at 21.

⁷⁶ *Id.* at 20-22.

⁷⁷ Starlink Reply Comments at 1.

⁷⁸ 47 U.S.C. § 254(f) (“A State may adopt regulations not inconsistent with the [FCC]’s rules to preserve and advance universal service.”).

Commission must be prepared to deny and/or revoke ETC designations for companies that will not recognize its authority or that refuse to comply with its ETC requirements.

ETC designation denial and revocation are not the only options available to the Commission and, for good reason (i.e., encouraging the flow of federal Universal Service support into the state to deploy broadband to the state's rural and low-income populations), they may not be the Commission's first choice.⁷⁹ For example, the Commission could take any of the following actions:

- Require compliance filings;⁸⁰
- Directly address consumer complaints;⁸¹
- Conduct its own audits and investigations;⁸² and/or
- Notify the FCC of rule violations and provide recommendations for federal Universal Service support reductions.⁸³

Other states have utilized these, or similar, actions to fulfill their roles as state ETC enforcers in the federal-state ETC partnership.⁸⁴

In the end, however, the Commission's ETC choice is binary. It can either grant an ETC designation/expansion request (albeit with conditions) or deny/revoke it. If a company refuses to recognize the Commission's authority and/or refuses to comply with the federal Universal Service protections the Commission carefully selects to advance federal Universal Service goals, it calls into question whether the company will actually use its federal Universal Service support for its intended purpose. In these situations, and provided there is sufficient evidentiary support, the Commission must be prepared to deny and/or revoke ETC designations for companies that will not recognize its authority or that refuse to comply with its ETC requirements.

This is not the situation for LTD's RDOF Phase I ETC expansion request. Therefore, subject to the ETC conditions that the Commission establishes for all the RDOF Phase I petitioners, the Commission should grant LTD's ETC expansion request.

⁷⁹ Although the Commission has the power to revoke a company's ETC status, such a remedy should not be invoked except in the most egregious circumstances and the Commission should first explore other alternatives to remedy concerns about an ETC's performance. See OAG Comments at 10 (citing the *2011 Transformation Order*, para. 618).

⁸⁰ See *2011 Transformation Order*, paras. 573-74 (explaining that the FCC's ETC reporting and certification requirements reflect a "floor rather than a ceiling" for states and "state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the [Act] and [the FCC's] implementing regulations . . .").

⁸¹ *Fifth Report and Order*, para. 28.

⁸² *Id.* (discussing state-initiated ETC investigations that led to states being "the first to identify waste, fraud, and abuse in the Lifeline program").

⁸³ *2011 Transformation Order*, para. 611 (encouraging states to bring to the FCC's attention issues and concerns about all ETCs operating within their boundaries).

⁸⁴ *Fifth Report and Order*, para. 28.

D. Claims that LTD has Not Shown that it can Fulfill its RDOF Phase I Requirements are Speculative and Based on Incomplete Information.

As discussed in greater detail below, claims that LTD cannot fulfill its RDOF Phase I requirements are speculative and based on incomplete information. The Commission should grant LTD's ETC expansion request, subject to the ETC conditions that the Commission establishes for all the RDOF Phase I petitioners.

1. It is not necessary for LTD to be a common carrier or certified Minnesota carrier to receive an RDOF Phase I ETC designation.

In its discussion of ETC requirements, the PBRTC states that "LTD is neither a common carrier nor a certified carrier in Minnesota and therefore lacks the basic qualification to be an ETC for federal USF support."⁸⁵ While it is true that the sections of the Act that discuss ETCs and the designation of ETCs specifically reference common carriers,⁸⁶ as discussed in section I, subsection A.3 of these Reply Comments, the FCC has extended federal Universal Service support to broadband Internet access and interconnected VoIP ETCs through its orders, and program- and auction-specific materials. Thus, LTD does not need to be a common carrier or a Minnesota-certificated carrier to receive an RDOF Phase I ETC designation.

2. The consumer protection information provided by LTD is consistent with the consumer protection information provided by other companies seeking ETC designations or expansions from the Commission.

Both the MTA and the PBRTC object to LTD's RDOF Phase I ETC expansion petition on the grounds that "LTD has provided nothing beyond the statement that it will comply" with the applicable consumer protection and service quality standards, and the company's Better Business Bureau rating.⁸⁷ Neither of these grounds is sufficient to deny LTD's ETC expansion request.

a. LTD's statement of compliance is sufficient to grant its ETC expansion request.

In its statement of compliance, LTD committed to "satisfy all consumer protection and service quality standards as provided in 47 C.F.R. § 54.202(a)(3), as well as all applicable state specific consumer protection and service quality standards."⁸⁸ LTD's statement is consistent with the commitment provided by most of the other Minnesota non-certificated companies and is more of a commitment than some:

For companies that did not explicitly state agreement to adhere to Commission regulations or that stated opposition to the oversight of

⁸⁵ PBRTC Comments at n.10.

⁸⁶ *See, e.g.*, 47 U.S.C. § 214(e)(1), (2) (specifically referencing common carriers).

⁸⁷ MTA Comments at 3; PBRTC Comments at 9.

⁸⁸ *In the Matter of the Petition of LTD Broadband LLC to Expand its Designation as an Eligible Telecommunications Carrier*, Docket No. P-6995/M-21-133, Petition for Expansion as an Eligible Telecommunications Carrier, Attach. 2 at 9 (Feb. 17, 2021).

the Commission, the Department reached out via email with a list of 19 basic consumer protections that are in Commission Rules and state statute and asked the companies if they would agree to abide by the protections These basic consumer protections adhere to CLECs and incumbent carriers [and n]ot all rules and regulations that apply to CLECs and incumbent carriers [were] included in [the] list. . . . Responses to the Department’s request that [companies] agree to the listed consumer protections varied. Most companies agreed to follow Commission established consumers protections as there appears to be some recognition that some consumer protections should exist for those customers receiving service made possible by government funds. Some companies did not specifically address consumer protections. Other companies felt they could pick and choose the protections they would agree to.⁸⁹

The OAG agrees that all ETC applicants must demonstrate that they will satisfy applicable consumer protection and service quality standards.⁹⁰ The Commission should not deny LTD’s ETC designation, however, when the company voluntarily commits to higher consumer-protection standards than its broadband Internet access and interconnected VoIP counterparts. Such a denial would inappropriately single out LTD and would result in the inconsistent application of ETC standards among the companies seeking a designation.

This does not mean that the Commission should permit Minnesota non-certificated companies to “pick and choose” their consumer protection and service quality standards. Minnesota non-certificated companies like LTD must comply with the basic consumer protection and service quality standards established by the Commission for all ETCs in its RDOF Phase I ETC order or must forgo their federal Universal Service RDOF Phase I ETC designations and support.

b. LTD’s Better Business Bureau rating is not sufficient to deny its ETC Status.

LTD’s Better Business Bureau (“BBB”) rating, while informative, is not sufficient grounds for an ETC expansion denial. To start, “BBB ratings represent the BBB’s *opinion* of how the business is likely to interact with its customers” using “information *BBB is able to obtain* about the business, including complaints received from the public.”⁹¹ In addition, the BBB itself acknowledges that its “ratings are not a guarantee of a business’s reliability or performance” and “recommends that consumers consider a business’s BBB rating *in addition to all other available*

⁸⁹ Department Comments at 9.

⁹⁰ MTA Comments at 3. Broadband Internet access and interconnected VoIP providers must do so pursuant to the previously-discussed federal and state ETC designation framework, however, not the federal rule cited by MTA for companies seeking an ETC designation from the FCC because they are not subject to state jurisdiction. *Compare* 47 C.F.R. § 54.202 (listing additional requirements for ETCs designated by the FCC), *with* 47 C.F.R. § 54.201 (discussing requirements for ETCs designated by state commissions).

⁹¹ Better Business Bureau Website, About BBB Ratings, <https://www.bbb.org/us/mn/albert-lea/profile/internet-service/ltd-broadband-0704-1000030372/overview-of-bbb-ratings> (last visited Apr. 11, 2021) (emphasis added).

information about the business.”⁹² This is a far cry from the FCC’s in-depth short-form application, competitive bidding auction, and long-form application evaluation process to determine the legal, technical, and financial qualifications of potential RDOF Phase I support recipients.

This does not mean that the Commission should ignore LTD’s BBB rating or disregard concern about the compliance of LTD and other Minnesota non-certificated companies with the Commission’s consumer protection and service quality standards, particularly those companies that opposed Commission oversight. The solution, however, is for the Commission to require Minnesota non-certificated companies like LTD to comply with the basic consumer protection and service quality standards the Commission establishes for all ETCs in its RDOF Phase I ETC order or forgo their federal Universal Service RDOF Phase I ETC designations and support.

3. Lifeline Program advertising concerns extend to companies besides LTD.

The MTA and PBRTC recommend that the Commission deny LTD’s ETC designation request because of concerns about LTD’s Lifeline Program advertising.⁹³ To support the recommendation, they point to LTD’s failure to respond to the Commission’s request for advertising practices information in the advertising, outreach, and offering of Lifeline by High Cost ETCs docket (Docket No. P-999/CI-20-747),⁹⁴ and LTD’s failure to provide information on its website regarding Lifeline.⁹⁵ And yet, in doing so, they do not seek ETC denial or revocation for the six other companies that failed to respond to the Commission’s Lifeline Program advertising request,⁹⁶ and at least two other companies that failed to provide Lifeline Program information on their websites.⁹⁷ The failure to provide Lifeline Program information on ETC websites was addressed in the Commission’s most recent ETC recertification docket, where the OAG stated that more than one company did not provide a working Lifeline webpage:

The Lifeline weblinks provided in the FCC Forms 481 of some companies did not work and/or a working web page could not be found. . . . If a company fails to comply with this requirement again next year, the OAG will provide recommendations to address the non-compliance.⁹⁸

⁹² *Id.* (emphasis added).

⁹³ MTA Comments at 4-5; PBRTC Comments at 5, 7, 11-12.

⁹⁴ MTA Comments at 4; PBRTC Comments at 11.

⁹⁵ MTA Comments at 5; PBRTC Comments at 7, 11.

⁹⁶ See MTA Comments at 4 (mentioning that six other companies failed to provide a response); PBRTC Communications at 11 (mentioning only LTD’s failure to provide a response).

⁹⁷ See MTA Comments at 5 (mentioning that two other companies failed to have Lifeline information on their websites); PBRTC Comments at 11 (acknowledging in its block quote that “two other providers” have no Lifeline information on their websites).

⁹⁸ *In the Matter of the Annual Certifications Related to Eligible Telecommunications Carriers’ (ETC) Use of Federal Universal Service Support*, Docket No. P-999/PR-20-8, Comments of the Office of the Attorney General at 11 (Sept. 1, 2020).

The Commission should not deny LTD's ETC expansion request on Lifeline Program advertising grounds. Such a denial would inappropriately single out LTD and would result in the inconsistent application of ETC standards among the companies seeking an ETC designation.

This does not mean that the Commission should not be concerned about the Lifeline Program compliance of LTD and other Minnesota non-certificated companies. Minnesota non-certificated companies like LTD must comply with the Lifeline Program rules applicable to High Cost ETCs or must forgo their federal Universal Service RDOF Phase I ETC designations and support.

4. The public interest concerns raised about LTD are highly speculative and based on incomplete information.

The MTA and the PBRTC assert that because of "apparent shortcomings" with LTD's technical and financial abilities, there is insufficient evidence to demonstrate that granting LTD's ETC request would be in the public interest.⁹⁹ All of the public interest concerns they raise are highly speculative and based on incomplete information.

a. LTD's past default and concerns about its technological ability are not sufficient to deny its ETC expansion request.

The MTA and the PBRTC rely on the service information provided on LTD's website and the fact that LTD defaulted in two of its five CAF Phase II states to support their assertion that LTD does not have the technological ability to meet its RDOF Phase I requirements.

Regarding the service information on LTD's website, the MTA argues that, to win the RDOF auction, LTD proposed a Gigabit level of service that the company does not currently offer to customers.¹⁰⁰ However, the FCC has already addressed the situation where a service provider bid in the RDOF auction based on a specific plan to meet the relevant performance obligations using broadband deployment speeds it does not currently offer to its customers. Specifically, the FCC's auction procedures notice explained that bids for non-deployed broadband speeds will be reviewed on a case-by-case basis:

Consistent with [the] policy of technological neutrality for voice and broadband services assigned support by Auction 904, [the FCC] remain[s] committed to the general case-by-case review approach . . . used in the CAF Phase II auction to review short-form applications. . . . [The FCC's] case-by-case approach furthers this objective *by giving service providers the opportunity to make a case based on their specific plans that they can meet the relevant performance obligations even if they themselves have not necessarily deployed broadband yet at those speeds.*¹⁰¹

⁹⁹ MTA Comments at 5-9; PBRTC at 4-9.

¹⁰⁰ MTA Comments at 6.

¹⁰¹ Auction Notice, para. 97 (emphasis added and internal citations omitted).

The notice went on to explain that the choice not to offer broadband to consumers at certain speeds would not prevent bidding at a particular service tier:

We are not convinced that we should take a step further and . . . prohibit an applicant from bidding in the Gigabit performance tier unless the [FCC] confirms the applicant advertises such services. We specifically created a path for applicants that lack a two-year operating history to participate in the auction. We are not persuaded that such an applicant should be precluded from proposing to use a technology that is reasonably capable of meeting the relevant public interest obligations in accordance with our eligibility decisions. Additionally, a service provider may choose not to offer a service to consumers for any number of reasons independent of its capability to do so for its intended Auction 904-supported network. However, we will ask questions about an applicant’s operating history and the services it provides as adopted in Appendix A, and responses to those questions, like the responses to all other questions in the Appendix, will be carefully considered and weighed by [FCC] staff when making eligibility determinations.¹⁰²

Thus, failure to provide evidence of offering a Gigabit service on its website is not sufficient to deny LTD’s ETC expansion request.

Regarding the default information, both the MTA and the PBRTC assert that LTD’s default on its CAF Phase II support in Nebraska and Nevada means that the company will not live up to its promises in Minnesota.¹⁰³ Setting aside the fact that LTD did not default in Minnesota, the FCC explicitly addressed default in its RDOF Phase I auction procedures. Specifically, the FCC barred only those CAF Phase II auction recipients that “defaulted on their *entire* CAF Phase II auction award” from participating in the RDOF auction and seeking RDOF Phase I support.¹⁰⁴ Thus, LTD’s CAF Phase II default in Nebraska and Nevada is not sufficient to deny LTD’s Minnesota ETC expansion request.

b. Concerns about LTD’s financial ability are not sufficient to deny its ETC expansion request.

The MTA and the PBRTC make a series of arguments about why LTD does not have the financial ability to build its proposed network.¹⁰⁵ However, MTA admits that it does not have access to LTD’s RDOF Phase I financial and technical information because the FCC treats such information as proprietary and confidential.¹⁰⁶

¹⁰² *Id.*, para. 120 (internal citations omitted).

¹⁰³ MTA Comments at 6; PBRTC Comments at 6.

¹⁰⁴ Auction Notice, n.65 (emphasis added).

¹⁰⁵ MTA Comments at 7-9; PBRTC Comments at 5-9.

¹⁰⁶ MTA Comments at 8.

The FCC has in place a rigorous financial review process that includes evaluating detailed financial information that is not available to third parties,¹⁰⁷ and a letter of credit requirement to cover, at a minimum, the first year of support that an RDOF Phase I recipient will receive.¹⁰⁸ As explained in the RDOF Phase I auction procedures notice:

The [FCC] staff’s determination at the short-form stage that an applicant is financially qualified to bid does not preclude a determination at the long-form application review stage that an applicant is not authorized to receive Rural Digital Opportunity Fund support. During the long-form application stage, a winning bidder must: (1) certify that it will have available funds for all project costs that exceed the amount of Rural Digital Opportunity Fund support for the first two years, (2) submit a description of how the required construction will be funded, and (3) obtain a letter of credit from a bank meeting the [FCC]’s requirements.¹⁰⁹

Without access to the detailed information the FCC possesses, any argument to deny LTD’s ETC expansion request for financial reasons is high-speculative, based on incomplete information, and should be rejected by the Commission.

5. The MTA has already asked the FCC to thoroughly vet LTD’s RDOF application.

The MTA’s comments discuss communications from members of Congress and the Board of Directors of the National Association of Regulatory Commissioners asking the FCC to thoroughly vet LTD’s RDOF application and invites the Commission to “evaluat[e] LTD’s claims closely.”¹¹⁰ Missing from MTA’s comments is a reference to its own petition asking the FCC to deny LTD’s long-form application for Minnesota.¹¹¹ That petition, although directed to the FCC, contains arguments that are largely, if not fully, identical to the ones already addressed in these comments.¹¹² Thus, while the Commission should accept MTA’s invitation to “evaluat[e] LTD’s claims closely,” such an examination demonstrates the need for ETC conditions, not a denial of LTD’s ETC expansion request.

¹⁰⁷ *In the Matter of Rural Digital Opportunity Fund, Connect America Fund*, WC Docket Nos. 19-126 and 10-90, Report and Order, FCC 20-5, n.248 (2020) (“*RDOF Order*”) (rejecting requests by outside parties to review confidential information in winning bidders’ applications and referencing the public inspection procedures from the CAF Phase II auction).

¹⁰⁸ *Id.*, paras. 96-108.

¹⁰⁹ Auction Notice, para. 61 (internal citations omitted).

¹¹⁰ MTA Comments at 9-10.

¹¹¹ *See generally In the Matter of LTD Broadband, LLC*, AU Docket Nos. 20-34 et al., Petition to Deny Long Form Applications (FCC Forms 683) for Rural Digital Opportunity Fund (“RDOF”) Phase I Auction Support in the States of Minnesota and Iowa, <https://www.neca.org/docs/default-source/wwpdf/public/32321mta.pdf> (filed Mar. 22, 2021) (last visited Apr. 11, 2021).

¹¹² *Id.*

II. THE COMMISSION SHOULD NOT REVOKE LTD’S EXISTING ETC DESIGNATION.

The Commission has the authority to revoke LTD’s existing ETC designation.¹¹³ Here, the MTA seeks revocation of the ETC designation the Commission granted to LTD in the Commission’s February 8, 2019 Order for CAF Phase II support awards (Docket No. P-6995/M-18-653). The MTA’s revocation request in the current docket is based on its RDOF Phase I-related concerns.¹¹⁴

Because MTA’s revocation request is for the ETC designation the Commission granted when LTD was awarded CAF Phase II support, the revocation request is based on MTA’s RDOF Phase I concerns, and for all the reasons discussed in above, the Commission should decline to revoke LTD’s existing ETC designation at this time. As the OAG’s Initial Comments explained, ETC status should not be revoked except in the most egregious circumstances and the Commission should first explore other alternatives to remedy concerns about an ETC’s performance.¹¹⁵

III. THE OAG WITHDRAWS ITS OBJECTION TO ETC STATUS FOR CONSOLIDATED COMMUNICATIONS OF MINNESOTA.

The FCC requires a winning bidder to demonstrate that it is an ETC in each geographic area for which it seeks RDOF Phase I support.¹¹⁶ Consolidated Communications of Minnesota Company (“Consolidated”) was the winning bidder for 12 Minnesota RDOF Phase I locations, with a total support amount of \$11,126.¹¹⁷ Because Consolidated had not filed an RDOF Phase I ETC request with the Commission by the initial comment deadline listed in the Notice, the OAG did not recommend ETC designation for the company.¹¹⁸

After the filing of initial comments, the OAG learned that Consolidated informed the Department that the company already has an ETC designation for the company’s RDOF Phase I geographic areas.¹¹⁹ To confirm, the OAG sent an email asking the company to explain how its current ETC status qualifies the company for ETC status in its RDOF Phase I winning bid areas. On March 31, 2021, Consolidated provided the OAG with Commission documentation and an exchange map that demonstrates that it already has ETC status in its RDOF Phase I winning bid areas.

Because Consolidated is already an ETC in each of the geographic areas for which it is an RDOF Phase I winning bidder, it may rely on its existing Minnesota ETC designation and does not need to file a new ETC petition with the Commission. Therefore, the OAG withdraws its objection to Consolidated’s RDOF Phase I ETC status and no Commission action is required.

¹¹³ See *supra* section I, subsection C.

¹¹⁴ MTA Comments at 10.

¹¹⁵ See OAG Comments at 10.

¹¹⁶ *RDOF Order*, para. 92.

¹¹⁷ Winning Bidder Announcement, Attach. A at 9, <https://docs.fcc.gov/public/attachments/DA-20-1422A2.pdf> (last visited Apr. 11, 2021).

¹¹⁸ OAG Comments at nn.2 & 155, Attach. A at n.2 and Attach B. at n.2.

¹¹⁹ Department Comments at 22 (referencing a March 18, 2021 email message from Consolidated to the Department).

IV. SUMMARY OF RECOMMENDATIONS

To ensure the RDOF Phase I support received by Minnesota ETCs is used for its intended purpose and the supported services are offered in a way that advances federal Universal Service, the OAG's Initial Comments proposed ETC obligations that the Commission should adopt for RDOF Phase I ETCs. To recap, the Commission should adopt the following obligations for RDOF Phase I ETCs:

Proposed ETC Obligations
Acknowledge and agree to comply with the FCC-mandated general ETC obligations discussed in section V, subsection A of the OAG's Initial Comments. ¹²⁰
Acknowledge and agree to comply with the FCC-mandated RDOF Phase I-specific ETC obligations discussed in section V, subsection B of the OAG's Initial Comments. ¹²¹
Acknowledge and agree to comply with the FCC-mandated High Cost Program-specific ETC obligations discussed in section V, subsection C of the OAG's Initial Comments. ¹²²
Acknowledge and agree to comply with the FCC-mandated Lifeline Program-specific ETC obligations for High Cost Program ETCs discussed in section V, subsection D of the OAG's Initial Comments. ¹²³
Acknowledge and agree to comply with the Commission obligations for High Cost Program ETCs discussed in section VI of the OAG's Initial Comments. ¹²⁴
Develop a consumer service inquiry process. ¹²⁵
Provide network buildout updates for the first two years of RDOF Phase I support. ¹²⁶
Monitor open Commission ETC-related proceedings for additional obligations that may arise after the receipt of an RDOF Phase I ETC designation. ¹²⁷
Comply with the consumer-protection obligations identified by the Department. ¹²⁸

CONCLUSION

Assuming the Commission adopts the proposed RDOF Phase I ETC obligations referenced in these Reply Comments, the OAG continues to recommend ETC status for most of the companies that seek it,¹²⁹ including LTD. The Commission has a duty to ensure that the RDOF Phase I support received by Minnesota ETCs is used for its intended purpose. A company that seeks a Minnesota ETC designation or expansion must comply with the RDOF Phase I ETC obligations the Commission adopts to advance the federal Universal Service goals. The Commission should

¹²⁰ OAG Comments at 22.

¹²¹ *Id.*

¹²² *Id.*

¹²³ *Id.*

¹²⁴ *Id.*

¹²⁵ *Id.* at 20-21.

¹²⁶ *Id.* at 21.

¹²⁷ *Id.* at 21-22.

¹²⁸ *Id.* at 21.

¹²⁹ *See supra* n. 1.

deny ETC status for any company that will not recognize the Commission's ETC authority or will not comply with the Commission's ETC requirements.

Dated: April 12, 2021

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ **Kristin Berkland**

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Assistant Attorney General
Atty. Reg. No. 0394804

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ATTORNEYS FOR OFFICE OF
THE ATTORNEY GENERAL—
RESIDENTIAL UTILITIES DIVISION

Attachment A - Revised

**Individual Commission Dockets for
Companies Seeking RDOF Phase I ETC Designation in Minnesota**

	PUC Docket No.	Petitioner Name
1	M-21-26	Starlink Services, LLC d/b/a Space Exploration Technologies Corp. (SpaceX)
2	M-21-31	AMG Technology Group, LLC d/b/a NextLink Internet
3	M-21-32	Aspire Networks 1, LLC/ Consortium of AEG and Heron Broadband I ¹
4	M-21-52	Arrowhead Electric Cooperative
5	M-21-53	Savage Communications
6	AM-21-56	Paul Bunyan Rural Telephone Cooperative d/b/a Paul Bunyan Communications
7	M-21-57	Wikstrom Telephone Company
8	AM-21-62	Consolidated Telephone Company d/b/a CTC
9	M-21-67	Roseau Electric Cooperative, Inc.
10	M-21-73	Gardenville Cooperative Telephone Association
11	AM-21-77	Farmers Mutual Telephone Company
12	AM-21-81	Federated Telephone Cooperative
13	M-21-83	Halstad Telephone Company
14	AM-21-84	Garden Valley Telephone Cooperative d/b/a Garden Valley Technologies (Halstad Telephone Company)
15	AM-21-92	Winnebago Cooperative Telecom Association
16	SA-21-124	Midcontinent Communications
17	M-21-132	Red River Rural Telephone Association d/b/a Red River Communications (Great Plains Consortium)
18	M-21-133	LTD Broadband LLC
19	M-21-158	CenturyLink Communications, LLC
20	M-21-161	Cable One VoIP LLC (Wisper-CABO 904 Consortium)
21	M-21-180	Interstate Telecommunications Cooperative, Inc. (Great Plains Consortium)
22	No ETC petition required	Consolidated Communications, Inc. ²
23	No ETC petition filed with Commission	Fond du Lac Communications, Inc. ³

¹ No Commission action is required for this company. Aspire withdrew its petition for ETC designation on March 1, 2021. See generally *In the Matter of Petition of Aspire Networks 2, LLC for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Support*, Docket No. P-7050/PR-21-32, Withdrawal Letter (Mar. 1, 2021). The Commission’s Executive Secretary granted the withdrawal request on March 17, 2021. Docket No. P-7050/M-21-32, NOTICE AND ORDER APPROVING PETITION TO WITHDRAW FILING (Mar. 17, 2021).

² No Commission action is required for Consolidated. The company is already an ETC in each of the geographic areas for which it won RDOF Phase I support. See Docket No. P-999/CI-21-86, Reply Comments of the OAG at section III.

³ The OAG does not make a recommendation for Fond du Lac Communications, Inc. To the OAG’s knowledge this company has not filed an ETC petition with the Commission.

	PUC Docket No.	Petitioner Name
24	M-21-248	Windstream Services, LLC ⁴

⁴ The OAG does not make a recommendation for Windstream because the company did not file its petition until April 6, 2021. See generally *In the Matter of the Petition of Windstream Communications, LLC for Designation as Eligible Telecommunications Carrier*, Docket No. P-6518/M-21-248, Petition for Designation as an Eligible Telecommunications Carrier (Apr. 6, 2021).



The Office of
Minnesota Attorney General Keith Ellison
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April 12, 2021

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: *In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners*
MPUC Docket No. P-999/CI-21-86 et al.

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Reply Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Kristin Berkland**

KRISTIN BERKLAND
Assistant Attorney General

(651) 757-1236 (Voice)
(651) 296-9663 (Fax)
kristin.berkland@ag.state.mn.us

CERTIFICATE OF SERVICE

Re: *In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners*
MPUC Docket No. P-999/CI-21-86 et al.

I, JUDY SIGAL, hereby certify that on the 12th day of April, 2021, I e-filed with eDockets *Reply Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal

JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-86_Official
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.	P.O. Box 920 312 Fourth Street Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-86_Official
Patrick	Caron	N/A	Wisper-CABO 904 Consortium	210 East Earl Dr Phoenix, AZ 85012	Paper Service	No	OFF_SL_21-86_Official
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_21-86_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-86_Official
Joshua	Guyan	iguyan@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
Kara	Hartman	kara.hartman@aspirenetworks.com	Aspire Networks 2, LLC	PO Box 349 Buford, GA 30515	Electronic Service	No	OFF_SL_21-86_Official
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-86_Official
Chris M.	Laughlin	claughlin@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
Phillip R.	Marchesiello	pmarchesiello@wbklaw.com	Wilkinson Barker Knauer, LLP	1800 M Street NW Suite 800N Washington, D.C. 20036	Electronic Service	No	OFF_SL_21-86_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
R. Edward	Price	Ted.Price@spacex.com	Space Exploration Technologies Corp.	1155 F Street NW Ste 475 Washington, DC 20004	Electronic Service	No	OFF_SL_21-86_Official
Eric	Pyland	epyland@team.nxlink.com	AMG Technology Investment Group, LLC	d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087	Electronic Service	No	OFF_SL_21-86_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-86_Official
Jennifer	Richter	jrichter@akingump.com	Akin Gump Strauss Hauer & Feld LLP	2001 K St. NW Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-86_Official
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Adams	Sharon.e.adams@verizon.com	XO Communications Services, LLC	22001 Loudoun Cty Pkw Ashburn, VA 20147	Electronic Service	No	OFF_SL_21-26_M-21-26
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	OFF_SL_21-26_M-21-26
Scott	Anderson	scott.anderson@midco.com	Miccontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-26_M-21-26
Vince	Aragona	varagona@neonetworkdevelopment.com	Neo Network Development Inc.	620 N River Rd Naperville, IL 60563	Electronic Service	No	OFF_SL_21-26_M-21-26
David	Arvig	david.arvig@arvig.com	East Otter Tail Telephone Company	c/o Arvig Communicat ion Systems 160 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-26_M-21-26
Steven	Avromov	savromov@bullseyetelecom.com	BullsEye Telecom, Inc.	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	OFF_SL_21-26_M-21-26
Donald	Bacon	db0569@att.com	AT&T	555 Reynolds St Gadsden, AL 35901	Electronic Service	No	OFF_SL_21-26_M-21-26
Melissa	Balu	mbalu@mediacomcc.com	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way Mediacom Park, NY 10918	Electronic Service	No	OFF_SL_21-26_M-21-26
Karly	Baraga Werner	Karly_Baraga-Werner@comcast.com	Comcast Phone of Minnesota, Inc.	10 River Park Plaza St. Paul, MN 55107	Electronic Service	No	OFF_SL_21-26_M-21-26
John	Barnicle	jbarnicle@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, ste 2730 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edine	Bayne	eb4965@att.com	Teleport Communications America, LLC	225 W Randolph St, 27C350 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26
Carl	Billek, Esq.	carl.billek@idt.net	IDT America Corp.	520 Broad St Newark, NJ 07102	Electronic Service	No	OFF_SL_21-26_M-21-26
Geoff	Bloss	gbloss@bomone.com	BCM One Group Holdings, Inc.	7676 Forsyth Blvd Ste 2700 Saint Louis, MI 10017	Electronic Service	No	OFF_SL_21-26_M-21-26
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Kristina	Bourget	tina.bourget@wintechnology.com	WIN, LLC	4955 Bullis Farm Rd Eau Claire, WI 54701	Electronic Service	No	OFF_SL_21-26_M-21-26
Kristina	Bourget	kbourget@wins.net	WIN, LLC	4955 Bullis Farm Road Eau Claire, WI 54701	Electronic Service	No	OFF_SL_21-26_M-21-26
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-26_M-21-26
Lance	Casey	lance.casey@consolidated.com	Consolidated Communications of Minnesota Company	221 E Hickory St PO Box 3248 Mankato, MN 56002	Electronic Service	No	OFF_SL_21-26_M-21-26
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_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda J	Cicco	linda.cicco@bt.com	BT Americas Inc.	11440 Commerce Park Dr Reston, VA 20191	Paper Service	No	OFF_SL_21-26_M-21-26
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-26_M-21-26
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Ralph	Dichy	rdichy@mettel.net	Metropolitan Telecommunications of Minnesota, Inc. dba MetTel	55 Water St FL 31 New York, NY 10041	Electronic Service	No	OFF_SL_21-26_M-21-26
Matt	Diebold	mdiebold@bigrivercom.com	Big River Telephone Company, LLC	24 S Minnesota Ave Cape Girardeau, MO 63702	Electronic Service	No	OFF_SL_21-26_M-21-26
Heather	Dobson	heather.dobson@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Dr St Louis, MO 63131	Electronic Service	No	OFF_SL_21-26_M-21-26
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_21-26_M-21-26
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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STEPHANIE	MARSH	stephanie.d.marsh@windstream.com	Windstream Services, LLC.	4001 N Rodney Fairham Rd Mailstop: 1170 B1F2-12A Little Rock, AR 72212	Electronic Service	No	OFF_SL_21-26_M-21-26
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Becky	Parker	bparker@nextera.net	Nextera Communications, LLC	13850 Bluestem Ct Suite 150 Baxter, MN 56425	Electronic Service	No	OFF_SL_21-26_M-21-26
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	OFF_SL_21-26_M-21-26
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-26_M-21-26
Jennifer	Richter	jr Richter@akingump.com	Akin Gump Strauss Hauer & Feld LLP	2001 K St. NW Washington, DC 20006	Electronic Service	No	OFF_SL_21-26_M-21-26
Alan	Rosenberg	arosenberg@accessmedia3.com	Access Media Holdings, LLC	900 Commerce Dr Ste 200 Oak Brook, IL 60523	Electronic Service	No	OFF_SL_21-26_M-21-26
Vince	Rosenthal	jr2762@att.com	AT&T Services, Inc.	225 W. Randolph St. Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26
Robert	Russell	brussell@dmv.com	Local Access LLC	11442 Lake Butler Boulevard Windermere, FL 34786	Electronic Service	No	OFF_SL_21-26_M-21-26
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-26_M-21-26
Ronald A	Sheehan	Ronald.Sheehan@fusionconnect.com	Fusion Connect LLC	695 Route 46 W Ste 200 Fairfield, NJ 07004	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Gwen	Sullivan	gsullivan@nttservices.com	Nebraska Technology & Telecommunications, Inc.	2308 S. 156th Circle Omaha, NE 68130	Electronic Service	No	OFF_SL_21-26_M-21-26
Kevin	Sullivan	Kevin.Sullivan@gtt.net	GC Pivotal, LLC	1595 Peachtree Pkwy Ste 204-337 Cumming, GA 30041	Electronic Service	No	OFF_SL_21-26_M-21-26
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	OFF_SL_21-26_M-21-26
Joseph	Topel	joe.topel.ext@orange.com	France Telecom Corporate Solutions L.L.C.	Coopermine Commons Bldg #2 Ste. 425 13865 Sunrise Valley Dr Herndon, VA 20171-6190	Electronic Service	No	OFF_SL_21-26_M-21-26
Alex	Valencia	avalencia@impacttelecom.com	Matrix Telecom, LLC	400 Las Colinas Blvd E Ste 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-26_M-21-26
Alex	Valencia	alex.valencia@lingo.com	Lingo Communications North, LLC	400 E Las Colinas Blvd Suite 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-26_M-21-26
Rebecca	West	rcui@oncommunications.com	CTC Communications Corp. d/b/a EarthLink Business	2851 Charlevoix Dr SE Ste 209 Grand Rapids, MI 49546	Electronic Service	No	OFF_SL_21-26_M-21-26

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_21-31_M-21-31
Generic Notice	Commerce Attorneys	commerce.attorneys@state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-31_M-21-31
Joshua	Guyan	iguyan@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-31_M-21-31
Chris M.	Laughlin	claughlin@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-31_M-21-31
Eric	Pyland	epyland@team.nxlink.com	AMG Technology Investment Group, LLC	d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087	Electronic Service	No	OFF_SL_21-31_M-21-31
Generic Notice	Residential Utilities Division	residential.utilities@state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-31_M-21-31
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-31_M-21-31

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_21-32_M-21-32
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-32_M-21-32
Kara	Hartman	kara.hartman@aspirenetworks.com	Aspire Networks 2, LLC	PO Box 349 Buford, GA 30515	Electronic Service	No	OFF_SL_21-32_M-21-32
Phillip R.	Marchesiello	pmarchesiello@wbklaw.com	Wilkinson Barker Knauer, LLP	1800 M Street NW Suite 800N Washington, D.C. 20036	Electronic Service	No	OFF_SL_21-32_M-21-32
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-32_M-21-32
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-32_M-21-32

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-52_M-21-52
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_21-52_M-21-52
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-52_M-21-52
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-52_M-21-52
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-52_M-21-52
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 6th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-52_M-21-52
John	Twiest	jtwest@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)	PO Box 39 5401 W Hwy 61 Lutsen, MN 55612	Electronic Service	No	OFF_SL_21-52_M-21-52

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-53_M-21-53
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-53_M-21-53
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_21-53_M-21-53
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-53_M-21-53
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-53_M-21-53
Scott	Savage	ssavage@scicable.com	Savage Communications	PO Box 810 115 Tobies Mill Pl Hinkley, MN 55037	Electronic Service	No	OFF_SL_21-53_M-21-53
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-53_M-21-53
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 6th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-53_M-21-53

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-56_M-21-56
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-56_M-21-56
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_21-56_M-21-56
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-56_M-21-56
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-56_M-21-56
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-56_M-21-56
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-56_M-21-56
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 6th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-56_M-21-56

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-57_M-21-57
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-57_M-21-57
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_21-57_M-21-57
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-57_M-21-57
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-57_M-21-57
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-57_M-21-57
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-57_M-21-57
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-57_M-21-57

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-62_M-21-62
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_21-62_M-21-62
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-62_M-21-62
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-62_M-21-62
Mark	Roach	mark@gocctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_21-62_M-21-62
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-62_M-21-62
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-62_M-21-62
Kristi	Westbrook	Kristi@goctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401-0972	Electronic Service	No	OFF_SL_21-62_M-21-62

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-67_M-21-67
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_21-67_M-21-67
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-67_M-21-67
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-67_M-21-67
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-67_M-21-67
Tracey	Stoll	tstoll@roseauelectric.com	Roseau Electric Cooperative, Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_21-67_M-21-67
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-67_M-21-67

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-73_M-21-73
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_21-73_M-21-73
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-73_M-21-73
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-73_M-21-73
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-73_M-21-73
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 6th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-73_M-21-73
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_21-73_M-21-73

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56221	Electronic Service	No	OFF_SL_21-77_AM-21-77
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_21-77_AM-21-77
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-77_AM-21-77
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-77_AM-21-77
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_21-77_AM-21-77
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-77_AM-21-77
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-77_AM-21-77
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-77_AM-21-77
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-77_AM-21-77

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_21-81_AM-21-81
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-81_AM-21-81
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_21-81_AM-21-81
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-81_AM-21-81
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-81_AM-21-81
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-81_AM-21-81
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-81_AM-21-81

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-83_M-21-83
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_21-83_M-21-83
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-83_M-21-83
Mark	Forseth	markforseth@rv.net	Halstad Telephone Company	Box 55 345 2nd Ave West Halstad, MN 56548	Electronic Service	No	OFF_SL_21-83_M-21-83
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-83_M-21-83
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-83_M-21-83
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-83_M-21-83

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-84_AM-21-84
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-84_AM-21-84
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-84_AM-21-84
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_21-84_AM-21-84
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-84_AM-21-84
Mark	Klinkhammer	mark.klinkhammer@gvtel.net	Garden Valley Telephone Company	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-84_AM-21-84
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-84_AM-21-84
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-84_AM-21-84
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-84_AM-21-84

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-92_AM-21-92
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-92_AM-21-92
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_21-92_AM-21-92
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-92_AM-21-92
John	Kroger	johnkroger@wctatel.com	Winnepago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	OFF_SL_21-92_AM-21-92
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-92_AM-21-92
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-92_AM-21-92
Mark	Thoma	markthoma@wctatel.com	Winnepago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_21-92_AM-21-92

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-124_SA-21-124
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-124_SA-21-124
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_21-124_SA-21-124
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-124_SA-21-124
Gail	Gauthier	gail.gauthier@windstream.com	Windstream, Business Telecom, CTC Comm, Deltacom, EarthLink B, McLeadUSA, PAETEC, Talk America	4001 N Rodney Parham Rd Mailstop: B01 F2-12A Little Rock, AR 72212-2442	Electronic Service	No	OFF_SL_21-124_SA-21-124
Patrick J	Mastel	pat.mastel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-124_SA-21-124
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-124_SA-21-124
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_21-124_SA-21-124
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-124_SA-21-124
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-124_SA-21-124

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mikaela	Burma	Mikaela.Burma@vantagepoint.com	VantagePoint	2211 N Minnesota St Mitchell, SD 57301	Electronic Service	No	OFF_SL_21-132_M-21-132
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_21-132_M-21-132
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-132_M-21-132
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-132_M-21-132
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-132_M-21-132
Tom	Steinolfson	toms@redrivercomm.com	Red River Communications	510 Broadway Abercrombie, ND 58001	Electronic Service	No	OFF_SL_21-132_M-21-132
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-132_M-21-132

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_21-133_M-21-133
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-133_M-21-133
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_21-133_M-21-133

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	OFF_SL_21-158_M-21-158
Greg	Arvig	GARVIG@NEXTERA.NET	Nextera Communications	Suite 100 7115 Forthum Rd Baxter, MN 56425	Electronic Service	No	OFF_SL_21-158_M-21-158
John	Barnicle	jbarnicle@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, ste 2730 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Kyle	Bertrand	kyle.bertrand@inteliquent.com	Onvoy, LLC	550 W Adams St Ste 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-158_M-21-158
Geoff	Bloss	gbloss@bcmone.com	BCM One Group Holdings, Inc.	7676 Forsyth Blvd Ste 2700 Saint Louis, MI 10017	Electronic Service	No	OFF_SL_21-158_M-21-158
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-158_M-21-158
Jenna	Brown	jbrown@voomsolutions.com	QuantumShift Communications, Inc	12657 Alcosta Blvd Ste 418 San Ramon, CA 94583	Electronic Service	No	OFF_SL_21-158_M-21-158
Gary	Case	gary.case@verizon.com	Verizon	600 Hidden Ridge Irving, TX 75038	Electronic Service	No	OFF_SL_21-158_M-21-158
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_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-158_M-21-158
Shira	Cook	shira.cook@zayo.com	Zayo Group, LLC	1805 29th St Ste 2050 Boulder, CO 80301	Electronic Service	No	OFF_SL_21-158_M-21-158
Corbin	Coombs	cc2862@att.com	AT&T Corp.	225 West Randolph Street Z2 Room 17A140 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Heather	Dobson	heather.dobson@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Dr St Louis, MO 63131	Electronic Service	No	OFF_SL_21-158_M-21-158
Andoni	Economou	aeconomou@mettel.net	Metropolitan Telecommunications of Minnesota, Inc.	55 Water St FL 31 New York, NY 10041	Electronic Service	No	OFF_SL_21-158_M-21-158
Carey	Gagnon	carey.gagnon@verizon.com	Verizon	3131 S Vaughn Way 5th Floor Aurora, CO 80014	Electronic Service	No	OFF_SL_21-158_M-21-158
John	Harrington	jharrington@inteliquent.com	Neutral Tandem-Minnesota	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Joe	Hartman	joe.hartman@acninc.com	ACN Communications Services, Inc.	1000 Progress Pl NE Concord, NC 28025	Electronic Service	No	OFF_SL_21-158_M-21-158
Stacey	Hines	stacey.hines@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Drive St. Louis, Missouri 63131	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ruth	Holder	ruth.holder@bt.com	BT Communications Sales LLC	11440 Commerce Park Dr Reston, VA 20191	Electronic Service	No	OFF_SL_21-158_M-21-158
Julian	Jacquez	jjacquez@bcntele.com	BCN Telecom, Inc.	1200 Mt. Kemble Ave. 3rd Fl. Harding Township, NJ 07960	Electronic Service	No	OFF_SL_21-158_M-21-158
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-158_M-21-158
Jim	Lundberg	jl@velocitytelephone.com	Velocity Telephone Inc	656 Mendelssohn Ave N Golden Valley, MN 55427	Electronic Service	No	OFF_SL_21-158_M-21-158
Laurie	McDonough	laurie.mcdonough@acntinc.com	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Electronic Service	No	OFF_SL_21-158_M-21-158
Sadia	Mendez	smendez@bcmone.com	BCM One, Inc.	521 5 h Ave FL 14 New York, NY 10175	Electronic Service	No	OFF_SL_21-158_M-21-158
Stephen	Meradith	WCI.Minnesota.govaffairs@windstream.com	McLeod USA Telecommunications Services, LLC	Windstream Communications 4001 Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_21-158_M-21-158
Richard	Monto	rmonto@inteliquent.com	Neutral Tandem-Minnesota, LLC	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Bruce A	Ney	bruce.ney@att.com	AT&T Services, Inc.	816 Congress Ave Ste 1100 Aus in, TX 78701	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Osborne	dosborne@localaccessllc.com	Local Access LLC	11442 Lake Butler Blvd Windermere, FL 34786	Electronic Service	No	OFF_SL_21-158_M-21-158
Jack D.	Phillips	jack.phillips@fr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_21-158_M-21-158
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-158_M-21-158
Robert	Russell	brussell@dmv.com	Local Access LLC	11442 Lake Butler Boulevard Windermere, FL 34786	Electronic Service	No	OFF_SL_21-158_M-21-158
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-158_M-21-158
Lisa	Sichler	lsichler@bullseyetelecom.com	Bullseye Telecom	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	OFF_SL_21-158_M-21-158
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-158_M-21-158
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-158_M-21-158
Alex	Valencia	avalencia@impacttelecom.com	Matrix Telecom, LLC	400 Las Colinas Blvd E Ste 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-158_M-21-158
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-158_M-21-158
Brian	Witte	bw8912@att.com	Teleport Communications America, LLC	C/O Global Connects / AT&T Corp. One AT&A Way Rm 4A252B Bedminster, NJ 07921	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Caron	Patrick.Caron@cableone.biz	Cable One, Inc.	210 E Earll Dr Phoenix, AZ 85012	Electronic Service	No	OFF_SL_21-161_M-21-161
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_21-161_M-21-161
Angela	Collins	acollins@cahill.com	Ionex Communications North, Inc. dba Birch Communications	1990 K St NW Ste 950 Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-161_M-21-161
Cherie R.	Kiser	ckiser@cgrdc.com	Cahill Gordon & Reindel LLP	1990 K St NW Ste 950 Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-161_M-21-161
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-161_M-21-161

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tracy	Bandemer	Tracy.Bandemer@itccoop.com	Interstate Telecommunications Cooperative, Inc..	312 4 h St W PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-180_M-21-180
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_21-180_M-21-180
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-180_M-21-180
John	Kuykendall	jkuykendall@jsitel.com	JSI on behalf of Interstate Telecommunications Cooperative, Inc.	7852 Walker Dr Ste 200 Greenbelt, MD 20770	Electronic Service	No	OFF_SL_21-180_M-21-180
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-180_M-21-180
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-180_M-21-180

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	GEN_SL_Windstream Communications, LLC_Windstream Communications ETC Service List
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	GEN_SL_Windstream Communications, LLC_Windstream Communications ETC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Windstream Communications, LLC_Windstream Communications ETC Service List
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	GEN_SL_Windstream Communications, LLC_Windstream Communications ETC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	No	GEN_SL_Windstream Communications, LLC_Windstream Communications ETC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Windstream Communications, LLC_Windstream Communications ETC Service List
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Windstream Communications, LLC_Windstream Communications ETC Service List