

April 19th, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of the Minnesota Public Utilities Information Request sent to all Rural
Digital Opportunity Fund (RDOF) Grant Winners

Dear Mr. Seuffert:

Attached please find Gardonville Cooperative Telephone Association's response to the Minnesota
Public Utilities Commission information request filed in Docket No. P527/M-21-73.

Please contact the undersigned if further information is needed at 651-621-8306.

Sincerely,

/s/ **Mary T. Buley**

Mary T. Buley
Consultant for Gardonville Cooperative Telephone Association

Additional Information Requested from ETC Petitioners

ETC Applicant Name: Gardonville Cooperative Telephone Association		
MPUC Docket Number: P527/AM-21-73		
	Yes (Certify)/ No	Additional Information (Attach additional pages as necessary)
1. Please certify the applicant's commitment to meeting the service and performance quality requirements applicable to its support type. See 47 C.F.R. § 54.202(a)(1).	YES	Gardonville certifies that it will comply with service requirements applicable to the support that it receives.
2. Will the applicant offer standalone voice telephony service? See 47 CFR 54.101(b). Applicants holding an ETC designation in MN should describe, in sufficient detail to understand the offering, their existing voice telephony service offered to customers, including tariff sheets and contracts, proof of making offerings for this service to consumers in their existing census blocks covered by their present ETC designation, and the number of customers using the applicant's offered voice telephony service in both total numbers and as a percent of customers served in the state. Indicate whether the offering for the RDOF census blocks covered by this application will be the same standalone service and if not, describe how it will differ. See 47 CFR 54.101 (b).	YES	<p>Please see Gardonville's RDOF ETC application, specifically Exhibit 2 page 12. This page is a copy of the current Gardonville's MN Intrastate Tariff and it lists the standalone residential local service rate of \$18.00 and a business local service rate of \$18.00. On this page there is a listing for local service in Gardonville's CLEC area. The CLEC local service rate is \$29.95.</p> <p>Gardonville has a total of 2,740 voice customers. This number of voice access customers represents 50% of its total customers.</p> <p>Customers in the RDOF Area will be offered the standard CLEC rate of \$29.95 for voice service from its Tariff.</p>

<p>3. If so, will the applicant do so through its own facilities, meaning "any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support" or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier)? See 47 CFR 54.201(d)(l).</p>	<p>YES</p>	<p>Gardonville will offer services in the RDOF Census blocks through a combination of its own facilities and reselling another carriers' voice services.</p>
<p>4. For the voice telephony service, identify the customer point of contact (name, address, contact information), and confirm this contact person is legally authorized to represent the applicant in communications with customers.</p>	<p>YES</p>	<p>David Wolf, CEO/General Manager, 800 Central Ave N, Brandon, MN 56315, telephone: 320-524-2211. Email: dwolf@gardonville.net</p>
<p>5. Does the voice telephony service have "access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems"? See 47 CFR § 54.101 (a).</p>	<p>YES</p>	<p>Gardonville's voice service includes access to E911 dialing.</p>
<p>6. Please describe how the applicant will remain functional in emergency situations, namely, what is "its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations." 47 CFR § 54.202(a)(2)?</p>	<p>YES</p>	<p>See Attachment 1.</p>
<p>7. Please describe the extent to which the offered voice telephony services will be offered at "rates that are equal or lower to the Commission's reasonable comparability benchmarks for fixed wireline services offered in urban areas." 47 CFR 54.804(b)(2)(iii).</p>	<p>YES</p>	<p>The local exchange rates offered by Gardonville are in the range of the announced FCC 2021 Annual Urban Rate Survey Rates.</p> <p>The 2021 Annual urban rate survey for an unlimited or flat rate local service average rate is \$33.73. The reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$54.75</p>
<p>8. Will the applicant satisfy additional requirements applicable to all high-cost ETCs, such as Lifeline obligations 47 CFR § 54.405</p>	<p>YES</p>	<p>Gardonville will make available Lifeline Service all qualifying customers.</p>

<p>9. If so, will the applicant commit to e-file documentation evidencing the offering of Lifeline service in the required census blocks as required by 47 CFR § 54.405(b).</p> <p>a. Current Lifeline providers should provide evidence of prior and current communications, including advertisements and website communications as described in 47 CFR § 54.405(c) for census blocks for which it currently receives support and the number of Lifeline customers being served.</p> <p>b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c).</p>	<p>YES</p>	<p>Gardonville provided samples of its existing Lifeline advertising in MN PUC Docket No. 20-747. That response is attached to this response. Gardonville advertises lifeline on its website, lifeline information is included in directory phone book and in its customer newsletter.</p>
<p>10. If the answer to question 3 above is through an affiliate or by offering a managed voice solution (including VoIP) through resale of another carrier's services, identify the other carrier, describe the legal relationship between the applicant and the other carrier, and describe how the other carrier will comply with the requirements listed above.</p>	<p>YES</p>	<p>Gardonville will resell the voice services of Inteliquent. Gardonville Cooperative Telephone Association and Inteliquent are separate legal entities and not related. Gardonville will purchase wholesale voice services by contract from Inteliquent.</p>
<p>11. Will the applicant commit to notifying the Minnesota Public Utilities Commission, Minnesota Department of Commerce and the Minnesota Office of the Attorney General if it has failed to meet its milestones for the identified census blocks under the FCC ROOF grant obligations? 47 CFR 54.320(d).</p>	<p>YES</p>	<p>Gardonville will notify the Minnesota Public Utilities Commission, The Minnesota Department of Public Safety, USAC and the FCC within 10 business days after the applicable deadline if it has failed to meet a build out milestone.</p>

Attachment 1 – Gardonville Response to Information Request No. 6
From Gardonville 481 Filing 2020

SAC: 361396

State: MN

Gardonville Coop Tel

Form 481 Line No. 610 Description of Functionality in Emergency Situations

Gardonville Coop Tel pursuant to MN Rule "7810.390 Emergency Operations" has:

- Established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide:
 - A minimum of four hours of battery service in each central office.
 - A permanently installed power unit in exchanges exceeding 5000 lines.
 - Mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.

- Has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.

October 30, 2020

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

Re: Response to Minnesota Public Utilities Commission Request for Information in Docket No. 20-747

Dear Mr. Seuffert:

Enclosed please find Revised Comments for Gardonville Cooperative Telephone Association as a ETC in Docket No. P999/CI-20-747. The number of lifeline customers has been corrected.

Please call me at 651-621-8306 with any questions.

Sincerely,

/s/ Mary T. Buley

Mary T. Buley
Telecommunications Consultant

Enclosure

cc: Donna Guetter, Gardonville Cooperative Telephone Association
Dave Wolf, Gardonville Cooperative Telephone Association

Revised Comments of Gardonville Cooperative Telephone Association as a High Cost
ETC in Minnesota PUC Docket No. 20-747

1. Current number of Lifeline Customers as of October 2020
 - a. Study Area Code: (361396) 26 lifeline customers

2. How are Lifeline Services Advertised:

Gardonville Cooperative Telephone Association (“Gardonville”) advertises Lifeline on its website at:

<https://www.gctel.com/notices-policies/telephone-assistance-plan-lifeline-programs/>

In addition, Gardonville advertises lifeline in its customer newsletter entitled “In The Loop”. Gardonville also provides an ad on lifeline in the phone book that it distributes. Customer Service Representatives also inform customers who cannot pay their bill or are in arrears on their account about the Lifeline program.

3. Provide Samples of Lifeline Advertising: Exhibit 1 is a scan of Gardonville’s website advertising lifeline. Exhibit 2 is the lifeline information that appears in Gardonville’s phone directory. Exhibit 3 is a copy of the March/April 2020 “In the Loop “ newsletter containing lifeline information.

4. Provide any additional Comments or observations on lifeline that is relevant to the Commission’s Inquiry.
No comments.

Exhibit 1 Snapshot of Gardonville’s Website on Lifeline



Lifeline & Telephone Assistance Plan

You may be eligible for assistance on your telephone or internet bill if you receive benefits from certain low-income assistance programs.

There are two programs:

- Minnesota’s Telephone Assistance Plan (TAP) offers a monthly credit of \$7.00 on your landline telephone service plan. You may receive the TAP credit on one landline per household.
- The Federal Lifeline Program offers a monthly discount of \$7.25 on some landline and wireless telephone service plans. Lifeline also offers discounts of \$9.25 on some broadband internet service plans. You may receive the Lifeline discount on one service per household. The definition of a “household” is anyone living at an address including children, relatives, people not related to you, etc. who share income(s) and household expenses.

If applying for the TAP discount, mail the [TAP application](#) and documents to the address below. If applying for the Lifeline discount, mail the [Lifeline application](#), [Lifeline Household Worksheet](#), and documents to the address below.

Gardonville
800 Central Ave N
Brandon, MN 56315

- [Acceptable Use Policy](#)
- [Bill Charge Explanations](#)
- [Call Before You Dig](#)
- [Customer Proprietary Network Information](#)
- [Directory Assistance Credit Information](#)
- [Do Not Call Registry](#)
- [Exemption from Assistance Charges](#)
- [Hosted Voice Services Terms and Conditions](#)
- [LALA Content Policy](#)
- [Lifeline & Telephone Assistance Plan](#)

IN THE LOOP

MARCH/APRIL 2020

gardonville
cooperative telephone association

In This Issue

- Lifeline & TAP 2
- Gopher Bounty 2
- Business Profile 3
- Welcome to the Team 3
- New Directories 3
- Directory Credit Assistance 3
- Telephone Relay 4
- New Members 4
- Office Closed 4

800 Central Ave N, Brandon, MN
218 3rd Ave E, Ste 101, Alexandria MN
Office: (320) 834-5151
Toll Free: (888) 236-3574
Help Desk: (320) 834-5155
Fax: (320) 524-2785
Email: gardon@gardonville.net
Hours: Monday-Friday
8:00 am-4:30 pm

www.gctel.com



Gardonville is an equal opportunity provider and employer.

COVID-19 Preparedness Statement

It is our priority and commitment to deliver essential communication services, like broadband internet, to our members and customers. We're being called upon from a federal, state and local level, all asking if we're capable of delivering reliable broadband during this difficult time. The answer is, yes, absolutely we will.

We are working as a team to plan the best way to deliver these products and services. One of our current focuses is to provide schools with a solution for distance learning. We will also be offering free community WiFi for those that need it. Go to our Facebook page for a map of hotspot locations.

Out of a desire to keep our staff and community safe, we're taking proactive steps to maintain a healthy workforce so that we can continue to provide the excellent

service you expect from us. We've established the following practices as it relates to Coronavirus (COVID-19).

Our Alexandria and Brandon offices will be closed to the public until further notice. Payments may be dropped off in the drop box outside. Online payment is also an option.

If a technician needs to come to your home or business and anyone in your household has a cough, fever, shortness of breath or has been traveling in the past 14 days, please contact us to reschedule your appointment. Call or text (320) 524-2211.

Our annual meeting, originally scheduled for May 1st, will be postponed until later in 2020.

Thank you for your understanding and cooperation. Please call (320) 524-2662 or visit www.gctel.com for future changes and updates.

Lifeline Program and Telephone Assistance Program

What is the Lifeline Program?

The Lifeline Program is a federal program that provides a monthly benefit on home or wireless phone or broadband service to eligible **cooperative members**.

The Lifeline benefit can lower the cost of your monthly phone or internet bill. Only one benefit is available per household; either phone service (home or wireless) or internet (home or mobile), but not both.

If you are eligible, apply for a benefit through a participating company in your area.

There are two ways to qualify for the Lifeline Program:

One: Income-Based Eligibility

If your household's income is at or below 135 percent of the federal poverty guidelines, you may be eligible for a Lifeline Program benefit.

135% of the 2020 Federal Poverty Income Guidelines:	
Household Size:	Income:
One	\$17,226
Two	\$23,274
Three	\$29,322
Four	\$35,370
Five	\$41,418
Six	\$47,466

For each additional person, add \$6,048

Two: Program-Based Eligibility

If someone in your household participates in one of these federal programs, you may be eligible for a Lifeline Program benefit:

- Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps
- Medicaid (Medical Assistance)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA) or Section 8
- Veterans Pension and Survivors Benefit
- Tribal Programs (and live on federally-recognized Tribal lands)

One Benefit Per Household

Only one Lifeline Program benefit (either wireless or land-line telephone, home Internet or a cell phone data plan) is allowed per household. The definition of a "household" is anyone living at an address (including children, etc.) who share income(s) and household expenses.

Telephone Assistance Program

The Telephone Assistance Program offers an additional monthly discount on your phone bill. Eligibility requirements are the same as Lifeline and is only available to **cooperative members**.

Gopher Bounty Program

Trap Gophers. Earn Money. Help Your Co-op.

Gardenville, along with other telecommunications companies in west central Minnesota have been inundated in past winters by fiber-optic cable cuts caused by gophers.

Most of the townships in the area pay a bounty for gophers. Their goal in paying the bounty is to encourage controlling the gopher population. They typically pay more for pocket gophers than striped gophers and always require proof of the capture. Each township has their own procedure, and information about their program is readily available.

Gardenville wants to support this effort by matching amounts paid out by townships that are in the co-op service area. Applicants simply need to present a township gopher bounty payment check and fill out a simple form. The Gardenville board will approve the amounts during its monthly meeting and a check will be mailed out to applicants. Look on Gardenville's website for more info.



Business Profile

ProFix Inc.

ProFix Inc. is an Electric Motor Repair shop, now in a new location in Alexandria. Established in July 2011, ProFix was created out of a need in the community for farmers, industrial companies and homeowners.

ProFix offers Repairs and Services of:

- Single & 3-Phase • Frequency Drives
- Irrigation • PTO Repair • Welding
- Torch Work • Furnace & A/C
- Air Compressor • Pool/Jet/Lake Pump
- Gear Box Rebuild • Crop Dryer
- Snow Blower Repair • Farm Duty

ProFix Inc. is a proud member of the Electrical Apparatus Service Association (EASA). EASA is an international trade organization of more than 1,900 electromechanical sales and service firms in 59 countries. Through its many engineering and educational programs, EASA provides members with a means of keeping up to date on materials, equipment, and state-of-the-art technology.

John Lhotak, general manager and repair technician, grew up in a motor shop that his grandfather owned in Omaha, Nebraska. "Motor repair isn't something that is taught in



schools or colleges anymore. These skills are just passed down from generation to generation," he says.

John and Steve Haugen (owner) have over 50 years of motor knowledge and repair. ProFix is able to load test the motor after the repair is complete, to make sure it is functioning at its full potential.

ProFix has a variety of motors in their shop that are for sale. Take a look next time you need them to repair, well, just about anything with a motor! No need to make an appointment. Just stop by during their business hours - Monday through Friday, 8 AM to 5 PM. Call for more information at (320) 763-3071.

ProFix is located at 1209 3rd Avenue East in Alexandria; next to Farm & Industrial Supply.



Welcome to the Team

We're expanding our Help Desk and Customer Service crew. Help us welcome John Reitter, Debbie Ryan and Jana Schaumburg to the team!



John Reitter



Debbie Ryan



Jana Schaumburg

NEW Directories are Here!

The 2020 Vikingland Regional Directory is here! If you haven't received one yet, pick yours up at either of our offices!

Feel free to bring in your old directories so we can recycle them for you.

Directory Credit Assistance Information

If you receive an incorrect telephone number from Directory Assistance, you are entitled to a credit for that Directory Assistance charge. You must use the same dialing pattern to request the credit that you used to make the call. For example, if you dialed 411 for Directory Assistance, you need to dial the same number to request the credit. This will ensure that the proper provider issues the credit.

You may request up to three credits. You will need to inform the provider which listing was incorrect, so the correction can be made. A credit equal to the incorrect charge will appear on your bill.

Welcome New Members!

BRANDON

Bodeaux, Anthony & Amanda.....524-2151
Johnson, Kevin.....524-2213
Burgener, A.....524-2152
Hintermeister, T & L.....524-2323
Fogg, John & Virginia.....524-2533

EVANSVILLE

Lesnau, Jeremy.....948-2234

GARFIELD

Davidson, Tiffany.....834-2133
Becker, Carissa.....834-2089

MILLERVILLE

Moundson, Matthew.....876-2040

Office Closed

Our offices will close at noon on Friday, April 10th in recognition of Good Friday.

Brain Buster

What mountain is the closest to the moon?

Answer

Name - Please Print

March/April Brain Buster

The letters of the word dormitory can be rearranged to produce a two-word phrase that describes a typical dormitory. What is that phrase?

Dirty Room

Last month's winner is DiAnn Ness. Stop in at either our Alexandria or Brandon office to get your goody bag, DiAnn!

Telephone Relay Service

Minnesota Relay is a free telephone service that uses specially trained communications assistants to facilitate telephone calls between people with hearing and speech disabilities and other individuals. Calls can be made to anywhere in the world, 24 hours a day, 365 days a year. All calls are completely confidential. To make a relay call dial 7-1-1. Once connected to the relay service, tell the communications assistant the type of relay call you wish to make. Or, you may dial the specific toll-free number for the type of relay service.

Types of Relay Services Available

Captioned Telephone Service (CTS): CTS uses a special telephone with a text display screen so that a person who is hard of hearing can listen to and read captions of everything the other person on the call says. You speak directly to the other person on the call, and a relay communications assistant transcribes everything the other person says into captions, which appear on the display screen of your CTS phone.

Internet Protocol Captioned Telephone Service (IP CTS): Internet-based forms of CTS are available for those who would like to use CTS on a computer, tablet, or smartphone. Go to: www.fcc.gov/consumers/guides/internet-protocol-ip-captioned-telephone-service

Computer (ASCII): 1-800-627-3529. Computer users can access Minnesota Relay. Set your communications software to the following protocols: speeds ranging from 300 to 2400; 8 Bits; No Parity; 1 Stop Bit; Full Duplex. When calling at a rate of 300 or below, follow the above using Half Duplex.

Hearing Carry Over (HCO): 1-800-627-3529. HCO allows a person who can hear clearly but who has very limited or no speech capability to make and receive phone calls. Using a special text telephone, you type your conversation for the relay communications assistant to read to the other person, and listen directly to the other person's response.

Hearing User: 1-800-627-3529. A hearing person may use a standard telephone or mobile phone to place a relay call and speak with a person who is deaf, hard of hearing, or speech disabled.

Internet Protocol (IP) Relay: IP Relay combines text-based relay service with the ease of the Internet – no need for a TTY. You are able to make your relay call using a computer, laptop, tablet, or smartphone. Go to: www.sprintrelay.com.

Spanish Relay: 1-877-627-5448. Spanish speaking persons with a hearing or speech disability are able to make relay calls. This is not a translation service – both parties must speak Spanish, and at least one party must have a hearing or speech disability.

Speech-to-Speech (STS): 1-877-627-3848. STS allows a person who has difficulty speaking or being understood on the phone to communicate using his or her own voice or voice synthesizer. The relay communications assistant repeats your words so that the other person on the call can understand them, and the other person speaks directly to you.

Text-Telephone (TTY): 1-800-627-3529. This service allows a person who is deaf, deafblind, or speech disabled to use a TTY to communicate with the other person on the call.

Video Relay Service (VRS): VRS allows a person who uses American Sign Language (ASL) to communicate over the phone. The VRS user connects to the relay communications assistant via an Internet-enabled device with a video camera. The communications assistant relays the conversation back and forth between the parties – in ASL with the VRS user and by voice with the called party. Go to: www.fcc.gov/consumers/guides/video-relay-services.

Voice Carry Over (VCO): 1-877-627-3024. VCO allows a person with a hearing disability, but who wants to use his or her own voice, to speak directly to the other party. The communications assistant then types the other party's response, which is displayed on the VCO user's text telephone.

Important Info About the Relay

Emergency Assistance: TTY callers should dial 9-1-1 directly in an emergency. All 9-1-1 centers are equipped to handle TTY calls. Minnesota Relay can process emergency calls, but this may delay the response to your call.

Filing a Complaint: Email your complaint to mn.relay@state.mn.us or call 1-800-657-3775. When filing your complaint please provide: date and time of the relay call, calling from and to phone numbers, CA's identification number and the nature of your complaint.

You may also file a complaint with the Federal Communications Commission:

- www.fcc.gov/complaints
- Voice: 1-888-225-5322
- TTY: 1-888-835-5322
- ASL via VP: 1-844-432-2275

Telephone Equipment Distribution

The TED Program provides free specialized telecommunications equipment to income eligible Minnesotans who are having trouble using the telephone due to a hearing, speech, or physical disability. For more information on the TED Program:

- mn.gov/dhs/ted-program
- Voice: 1-800-657-3663
- TTY: 1-888-206-6555
- ASL via VP: 1-866-635-008



Phone Discounts For Low-Income Users

www.gctel.com
www.runestone.net

Lifeline

This is a federally funded program that will provide a credit each month on your bill. To be eligible, you must be enrolled in one of the following programs:

- Medicaid (Medical Assistance)
- Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Veteran's Pension or Survivor's Pension Benefit
- Individuals that do not qualify under the above criteria but live on a federally recognized reservation may qualify if the applicant receives benefits from one of the following programs: Bureau of Indian Affairs General Assistance; Tribally Administered Temporary Assistance for Needy Families; Head Start (only for those meeting its income qualifying standard); or the National School Lunch Program's free lunch program.
- If you are not on one of the above programs, but your income is at or below 135% of the Federal Poverty Guidelines, you may also apply for and receive the discount. You will need to attach proof of your income to your application.
- For questions about Lifeline or Link-Up, contact your local telephone company.

Telephone Assistance Plan (TAP)

This program offers an additional monthly discount on your phone bill. Eligibility requirements are the same as Lifeline above.



E

