

September 10, 2025

Mike Bull Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, Minnesota 55101-2147

RE: Revision to Comments of the Minnesota Department of Commerce Docket No. P999/PR-25-8

Dear Mr. Bull:

Enclosed is a revision to page 9 of the Minnesota Department of Commerce's September 2, 2025 Comments in Docket No. P999/PR-25-8, which were filed in response to the Minnesota Public Utilities Commission's May 23, 2025 Notice of Comment Period in the following matter:

Annual Certifications Related to Eligible Telecommunications Carriers' (ETCs) Use of Federal Universal Service Support.

Page 9 of the Department's September 2, 2025 comments, incorrectly referenced the year 2023 and should, instead have referenced the year 2024. The attached revision shows the correction to page 9 of the comments. The Department is available to answer questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

DD/ar

Attachment

modifications to the best practices for an annual filing along with the appropriate docket and timing of an annual filing.

IV. DEPARTMENT ANALYSIS

A. OVERVIEW OF DEPARTMENT EXAMINATION

A.1. High-Cost Plans Subject to Certification.

The FCC, through USAC,²² disburses funds to companies through more than 20 different funding programs. In 2023-2024, USAC disbursed \$164,771,105 from eight different programs in Minnesota. These funds were distributed through the following programs, ranked from most to least dollars distributed (plans with \$0 distributed in Minnesota are excluded from this list).

Plan	Abbrev.	Amount Disbursed in
		MN in 2024
Enhanced Alternative Connect America Mode	el EACAM	\$95,234,316.96
Alternative Connect America Model	ACAM	\$16,823,990.04
Alternative Connect America Model II	ACAM II	\$12,553,783.20
Intercarrier Compensation Recovery	ICC	\$17,076,672.00
Connect America Fund Broadband Loop	CAF BLS	\$10,573,980.00
Support		
Rural Digital Opportunity Fund	RDOF	\$8,008,902.60
Connect America Fund Phase II Auction	CAF II Auction	\$2,962,710.22
High Cost Loop	HCL	\$1,194,954.00
Rural Broadband Experiment	RBE	\$341,796.12
Total		\$164,771,105.14

USAC provides a description of each fund at https://www.usac.org/high-cost/funds/.

A.2. Overview of Certification Review.

The Minnesota Commission is required to annually certify that "all federal high-cost support provided to [ETCs] within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to" 47 CFR 54.314(a).²³ The FCC's 481 Form is the primary informational tool used in the certification process, but additional information is relevant in determining whether an ETC should be granted certification.

²² USAC distributes and manages all the universal service funds mandated by the FCC.

²³ See CFR-2022-title47-vol3-part54.pdf (govinfo.gov)

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce Revised Comments

Docket No. P999/PR-25-8

Dated this 9th day of September 2025

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	Trade	Service List Name
1	Issa	Asad	reg@qlinkwireless.com	Q Link Wireless LLC		499 E Sheridan St Ste 400 Dania Beach FL, 33004 United States	Electronic Service		No	P999/PR- 25-8
2	Tracy	Bandemer	tracy.bandemer@itccoop.com	Interstate Telecommunications Cooperative, Inc.		312 4th St W PO Box 920 Clear Lake SD, 57226 United States	Electronic Service		No	P999/PR- 25-8
3	Dianne	Barthel	dianne.barthel@centurylink.com	Qwest Communications Company, LLC.		200 S 5th St Rm 2200 Minneapolis MN, 55402 United States	Electronic Service		No	P999/PR- 25-8
4	James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.		123 W 7th Street Blue Earth MN, 56013 United States	Electronic Service		No	P999/PR- 25-8
5	Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company		301 2nd St S Bellingham MN, 56221 United States	Electronic Service		No	P999/PR- 25-8
6	Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company		301 2nd St S Bellingham MN, 56212-1000 United States	Electronic Service		No	P999/PR- 25-8
7	Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative		405 2nd Street East PO Box 156 Chokio MN, 56221 United States	Electronic Service		No	P999/PR- 25-8
8	David	Bickett	dave.bickett@parkregion.com	Otter Tail Telcom		PO Box 277 100 Main St Underwood MN, 56586 United States	Electronic Service		No	P999/PR- 25-8
9	Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company (old)		150 2nd Ave SW Perham MN, 56573 United States	Electronic Service		No	P999/PR- 25-8
10	Karl	Blake	kblake@polartel.com	Polar Communications Mutual Aid Corp.		PO Box 270 110 Fourth Street East Park River ND, 58270 United States	Electronic Service		No	P999/PR- 25-8
11	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	P999/PR- 25-8
12	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	P999/PR- 25-8
13	Chad	Bullock	chadb@wcta.net	West Central Telephone Association		308 Frontage Road PO Box 304 Sebeka MN, 56477 United States	Electronic Service		No	P999/PR- 25-8
14	Thomas	Burns	tgburns@otcpas.com	OLSEN THIELEN & CO. LTD		2675 Long Lake Rd Saint Paul MN, 55113 United States	Electronic Service		No	P999/PR- 25-8
15	Danny	Busche	dannybusche@live.com	Winthrop Telephone Company		318 2nd Ave E PO Box 310 Franklin MN, 55333-0310 United States	Electronic Service		No	P999/PR- 25-8

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	Thomas	Campbell	tcampbell@otcpas.com	Olsen Thielen		2675 Long Lake Road St. Paul MN, 55309 United States	Electronic Service		No	P999/PR- 25-8
17	James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.		P.O. Box 920 312 Fourth Street Clear Lake SD, 57226 United States	Electronic Service		No	P999/PR- 25-8
18	Andrew	Carlson	acarlson@taftlaw.com	Taft Stettinius & Hollister LLP		Suite 2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	P999/PR- 25-8
19	DANYELL	CARROLL	danyell.carroll@windstream.com	Talk America, LLC		4001 N Rodney Parham Rd Little Rock AR, 72212 United States	Electronic Service		No	P999/PR- 25-8
20	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	P999/PR- 25-8
21	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Street Suite 1400	Electronic Service		Yes	P999/PR- 25-8
22	Angie	Dickison	angie.dickison@tdstelecom.com	TDS Telecom LLC			Electronic Service		No	P999/PR- 25-8
23	Donna	Eul	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company		301 2nd St S Bellingham MN, 56212 United States	Electronic Service		No	P999/PR- 25-8
24	Trent	Fellers	trent.fellers@windstream.com	Windstream		1440 M St Lincoln NE, 68508 United States	Electronic Service		No	P999/PR- 25-8
25	Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI		2631 Morse Rd Columbus OH, 43231-5931 United States	Electronic Service		No	P999/PR- 25-8
26	Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.		P.O. Box 349 612 East 3rd Garretson SD, 57030 United States	Electronic Service		No	P999/PR- 25-8
27	Travis	Floyd	travisf@wcta.net	West Central Telephone Association		308 Frontage Rd PO Box 304 Sebeka MN, 56477 United States	Electronic Service		No	P999/PR- 25-8
28	Mark	Forseth	markforseth@rrv.net	Halstad Telephone Company		Box 55 345 2nd Ave West Halstad MN, 56548 United States	Electronic Service		No	P999/PR- 25-8
29	Julie	Geerdes	jgeerdes@paulbunyan.net	Paul Bunyan Rural Telephone Coop		1831 Anne St. NW Bemidji MN, 56601 United States	Electronic Service		No	P999/PR- 25-8
30	Mackenzie	Gilbertson	mackenzie.gilbertson@aciracoop.net	Federated Telephone		405 2nd Street East PO Box 156 Chokio MN, 56221 United States	Electronic Service		No	P999/PR- 25-8

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31	Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Association		PO Box 304 308 Frontage Rd Sebeka MN, 56477 United States	Electronic Service		No	P999/PR- 25-8
32	William	Haas	william.haas@t-mobile.com	T-Mobile USA, Inc. (PARTY)		P.O. Box 10076 Cedar Rapids IA, 52410 United States	Electronic Service		No	P999/PR- 25-8
33	Roxi	Hacker	roxih@interstatetelcom.com	Interstate Telcom Consulting, Inc		130 Birch Ave Hector MN, 55342 United States	Electronic Service		No	P999/PR- 25-8
34	Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.		1104 19th Ave SW Ste B Willmar MN, 56201 United States	Electronic Service		No	P999/PR- 25-8
35	Corey	Hauer	coreyhauer@gmail.com	LTD Broadband LLC		69 Teahouse St Las Vegas NV, 89138 United States	Electronic Service		No	P999/PR- 25-8
36	Donna	Heaston	donna.heaston@allstream.com	Electric Lightwave, LLC (New)		dba Allstream 2800 Campus Dr Ste 140 Plymouth MN, 55441 United States	Electronic Service		No	P999/PR- 25-8
37	Kent	Hedstrom	kent@runestone.net	Runestone Telephone Association		PO Box 336 100 Runestone Dr Hoffman MN, 56339-0336 United States	Electronic Service		No	P999/PR- 25-8
38	Bruce	Hegge	manager@springgrove.coop	Spring Grove Communications		PO Box 516 166 W Main St Spring Grove MN, 55974 United States	Electronic Service		No	P999/PR- 25-8
39	Sarah	Hendel	info@lismoretele.com	Lismore Cooperative Telephone Company		230 S. 3rd AvePO Box 127 Lismore MN, 56155 United States	Electronic Service		No	P999/PR- 25-8
40	Cory	Hoerler	choerler@mhtele.com	Manchester Heartland		204 Railroad St Manchester MN, 56007-5012 United States	Electronic Service		No	P999/PR- 25-8
41	Conrad	Johnson	jtcconrad@jtc-co.net	Johnson Telephone Company		205 1st Ave NE PO Box 39 Remer MN, 56672-0039 United States	Electronic Service		No	P999/PR- 25-8
42	Dwayne	Johnson	jtcbusiness@jtc-co.net	Johnson Telephone Company		205 1st Ave NE PO Box 39 Remer MN, 56672-0039 United States	Electronic Service		No	P999/PR- 25-8
43	Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.		P.O. Box 1596 1831 Anne Street NW Bemidji MN, 56601 United States	Electronic Service		No	P999/PR- 25-8
44	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	P999/PR- 25-8
45	Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association		131 6th St Albany MN, 56307-8322 United States	Electronic Service		No	P999/PR- 25-8
46	Carrie	Kern Taggart	cak@wiktel.com	Wikstrom Telephone Company Inc		212 South Main PO Box 217 Karlstad MN,	Electronic Service		No	P999/PR- 25-8

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						56732 United States				
47	Randy	Kiesel	randy.kiesel@metronetinc.com	Metro Fibernet, LLC		3701 Communications Way Evansville IN, 47715 United States	Electronic Service		No	P999/PR- 25-8
48	Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company		337 Aetna St Ruthton MN, 56170 United States	Electronic Service		No	P999/PR- 25-8
49	Pat	Knutson	pat.knutson@aciracoop.net	Farmers Mutual Telephone Company		PO Box 156 Chokio MN, 56221 United States	Electronic Service		No	P999/PR- 25-8
50	Patricia	Knutson	in.another.account.pat.knutson@aciracoop.net	Federated Telephone Cooperative		405 2nd Street East PO Box 156 Chokio MN, 56221 United States	Paper Service		No	P999/PR- 25-8
51	Julie	Kolka	juliekolka@mabeltel.coop	Harmony Telephone Company, LLC		PO Box 368 214 N Main St Mabel MN, 55954-0368 United States	Electronic Service		No	P999/PR- 25-8
52	John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.		704 E. Main Street Lake Mills IA, 50450 United States	Electronic Service		No	P999/PR- 25-8
53	Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU- Telecom		27 North Minnesota P.O. Box 697 New Ulm MN, 56073 United States	Electronic Service		No	P999/PR- 25-8
54	Al	Lundeen	alundeen@wiktel.com	Wikstrom Telephone Company		212 S Main St Karlstad MN, 56732-0217 United States	Electronic Service		No	P999/PR- 25-8
55	Monty	Morrow	montymorrow@nuvera.net	Nuvera Communications, Inc.		235 Franklin St Hutchinson MN, 55350 United States	Electronic Service		No	P999/PR- 25-8
56	Steve	Mueller	steve.mueller@gvtel.net	Garden Valley Telephone Company d/b/a Garden Valley Technologies		201 Ross Ave Erskine MN, 56535 United States	Electronic Service		No	P999/PR- 25-8
57	Melanie	Nelson	phinkley@rrv.net	Halstad Telephone Company		345 2nd Ave W PO Box 55 Halstad MN, 56548 United States	Electronic Service		No	P999/PR- 25-8
58	Josh	Netland	jnetland@emily.net	Emily Cooperative Telephone Company		PO Box 100 40040 State Hwy 6 Emily MN, 56447-0100 United States	Electronic Service		No	P999/PR- 25-8
59	Chris	Olson	wcphone@wcta.net	West Central Telephone Assoc.		P.O. Box 304 308 Frontage Road Sebeka MN, 56477 United States	Electronic Service		No	P999/PR- 25-8
60	Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association		506 Broadway PO Box 136 Abercrombie ND, 58001-0136 United States	Electronic Service		No	P999/PR- 25-8
61	Paul	Paco Erickson	paco_erickson@mmi.net			3901 N Louise Ave Sioux Falls SD, 57107 United States	Electronic Service		No	P999/PR- 25-8

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62	Michelle	Painter	michelle.painter@sprint.com	Assurance Wireless USA, L. P.		12502 Sunrise Valley Dr Reston VA, 20196 United States	Electronic Service		No	P999/PR- 25-8
63	Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.		14450 Burnhaven Drive Burnsville MN, 55306 United States	Electronic Service		No	P999/PR- 25-8
64	Brian	Rathman	brian.rathman@telrite.com	Telrite Corporation		2300 Windy Ridge Pkwy Ste 350S Atlanta GA, 30339 United States	Electronic Service		No	P999/PR- 25-8
65	Julia	Redman Carter	julia.redmancarter@viaoneservices.com	Boomerang Wireless LLC		2711 Lyndon B. Johnson Fwy Ste. 1065 Dallas TX, 75234 United States	Electronic Service		No	P999/PR- 25-8
66	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	P999/PR- 25-8
67	Tym	Rutkowski	tym.rutkowski@mossadams.com	Moss Adams		Eagan MN, null United States	Electronic Service		No	P999/PR- 25-8
68	Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company		2220 125th St NW Rice MN, 56367 United States	Electronic Service		No	P999/PR- 25-8
69	David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.		150 2nd St SW Perham MN, 56573 United States	Electronic Service		No	P999/PR- 25-8
70	Julie	Serbus	jserbus@mnval.net	Minnesota Valley Telephone Company		PO Box 310 340 2nd Ave E Franklin MN, 55333 United States	Electronic Service		No	P999/PR- 25-8
71	Ryan	Severson	rseverson@roseauelectric.com	Roseau Electric Cooperative Inc.		1107 3rd St NE PO Box 100 Roseau MN, 56751-1326 United States	Electronic Service		No	P999/PR- 25-8
72	Samantha	Simatos	samantha.simatos@mossadams.com			601 W Riverside Avenue Spokane WA, 99201 United States	Electronic Service		No	P999/PR- 25-8
73	Greg	Springer	greg@goctc.com	Consolidated Telephone Company		PO Box 972 1102 Madison St Brainerd MN, 56401 United States	Electronic Service		No	P999/PR- 25-8
74	Kimberly	Starr	kim@dunnelltelephone.com	Dunnell Telephone Company		PO Box 728 Judson TX, 75660 United States	Electronic Service		No	P999/PR- 25-8
75	Tracey	Stoll	tstoll@roseauelectric.com	Roseau Electric Cooperative, Inc.		1107 3rd St NE PO Box 100 Roseau MN, 56751-1326 United States	Electronic Service		No	P999/PR- 25-8
76	Cynthia	Sweet	csweet@acentek.net	Ace Telephone Association		PO Box 360 207 East Cedar Houston MN, 55943-0360 United States	Electronic Service		No	P999/PR- 25-8

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77	Guy	Swenson	tecmanager@barnesvillemn.com	Barnesville Municipal Telephone Company		PO Box 550 101 Front St S Barnesville MN, 56514 United States	Electronic Service		No	P999/PR- 25-8
78	Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.		704 E Main St Lake Mills IA, 50450 United States	Electronic Service		No	P999/PR- 25-8
79	Amy	Thompson	sflanders@polartel.com	Polar Communications		PO Box 270 Park River ND, 58270 United States	Electronic Service		No	P999/PR- 25-8
80	Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville		18 2nd Avenue NW Kasson MN, 55944 United States	Electronic Service		No	P999/PR- 25-8
81	Jason	Торр	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	P999/PR- 25-8
82	Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone		PO Box 277 Upsala MN, 56384 United States	Electronic Service		No	P999/PR- 25-8
83	Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone		1831 Anne St NW Bemidji MN, 56601 United States	Electronic Service		No	P999/PR- 25-8
84	Kalsie	Vanasse	kalsiev@paulbunyan.net	Paul Bunyan Rural Telephone Coop		1831 Anne Street NW Bemidji MN, 56601 United States	Electronic Service		No	P999/PR- 25-8
85	Amy	Vick	amy.vick@itccoop.com	Interstate Telecommunications Coop., Inc.		312 4th St. W. PO Box 920 Clear Lake SD, 57226 United States	Electronic Service		No	P999/PR- 25-8
86	Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications		3901 N Louise Ave Sioux Falls SD, 57107 United States	Electronic Service		No	P999/PR- 25-8
87	Lyle	Waughtal	lyle.waughtal@gvtel.net	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	P999/PR- 25-8
88	Mark	Wegscheid	markw@broadband-mn.com	Broadband Corp.		1772 Steiger Lake Ln Victoria MN, 55386 United States	Electronic Service		No	P999/PR- 25-8
89	Kristi	Westbrock	kristi@goctc.com	Consolidated Telephone Company		1102 Madison St PO Box 972 Brainerd MN, 56401-0972 United States	Electronic Service		No	P999/PR- 25-8
90	Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company		PO Box 217 212 South Main St Karlstad MN, 56732-0217 United States	Electronic Service		No	P999/PR- 25-8
91	Anthony	Will	anthonyw@broadband-mn.com	Broadband Corp		585 Hwy 7 W Hutchinson MN, 55350 United States	Electronic Service		No	P999/PR- 25-8

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
92	David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association		800 Central Ave N Brandon MN, 56315 United States	Electronic Service		No	P999/PR- 25-8
93	Shane	Young	office@northern.tel	Northern Telephone Company		13448 County Road 25 Wawina MN, 55736 United States	Electronic Service		No	P999/PR- 25-8