

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,<sup>22</sup> 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 Model	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 Support	CAF BLS	\$10,573,980.00
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	<u>\$341,796.12</u>
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).<sup>23</sup> 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.

<sup>22</sup> USAC distributes and manages all the universal service funds mandated by the FCC.

<sup>23</sup> 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 9<sup>th</sup> day of **September 2025**

**/s/Sharon Ferguson**





#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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 Ave PO 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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						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@mabtel.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
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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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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