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September 4, 2015

**PUBLIC DOCUMENT**

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **PUBLIC Comments of the Minnesota Department of Commerce**  
Docket No. P999/PR-15-08

Dear Mr. Wolf:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce in the following matter:

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

The Department's recommendation is contained herein. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ KATHERINE DOHERTY  
Rates Analyst

KD/ja  
Attachment

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**PUBLIC COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE**

**DOCKET No. P999/PR-15-08**

**I. HISTORICAL BACKGROUND**

Section 254(e) of the Telecommunications Act of 1996 provides that a carrier who receives universal service support must use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

On May 23, 2001, the FCC issued its Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45,<sup>1</sup> adopting rules governing the distribution of support to rural carriers. Among other things, the FCC concluded that states should file annual certifications with the FCC to ensure that rural and non-rural carriers receiving universal service fund support use that support only for the provision, maintenance and upgrading of facilities and services for which the support is intended consistent with section 254(e).

On December 23, 2002, the Minnesota Public Utilities Commission (Commission) issued an Order in Docket No. P999/M-02-1403, setting forth requirements that each ETC who received universal support file an affidavit from a corporate officer stating that any Universal Service Funds received would be used only for their intended purpose, and documentation regarding the previous year's receipt of subsidies from the Universal Service Fund and the company's operating and capital expenditures.

On March 17, 2005, the Federal Communications Commission released a Report and Order in the Matter of the Federal-State Joint Board on Universal Service.<sup>2</sup> In the Order, the FCC adopted additional "mandatory requirements for ETC designation proceedings in which the

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<sup>1</sup> In the Matter of Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, May 23, 2001

<sup>2</sup> 47 U.S.C § 254(e).

[Federal Communications] Commission acts pursuant to section 214(e)(6)<sup>3</sup> of the Communications Act of 1934, as amended.”<sup>4</sup>

On July 21, 2005, in Docket No. P999/M-05-741, the Commission issued an Order incorporating into its future annual certification process (beginning with petitions filed by ETCs in 2006) the filing requirements set forth by the FCC in CC Docket 96-45, FCC 05-46, with modifications.

On November 18, 2011, the FCC released its Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Connect America, et al. in WC Dockets No. 10-90, 07-135, 03-109, and 10-208, GN Docket No. 09-51, CC Dockets 09-92 and 96-45, and WT Docket No 10-208 (CAF-ICC Order), which comprehensively reformed universal service and intercarrier compensation mechanisms. Among other things, the CAF-ICC Order addressed annual Section 254(e) certification by states (with respect to the ETCs they have designated). The FCC extended its current reporting requirements (previously codified in 47 C.F.R. §54.209) to all ETCs, including those designated by states, incorporated new reporting requirements, and codified the reporting requirements in new section 54.313 of its rules.

On April 11, 2014, the Commission issued an Order, modifying the schedule for 2014 and future annual certifications as follows:

July 1	Deadline for ETCs to file petitions and supporting documentation, including the information required by FCC Form 481
September 1	Deadline for comments by the Department, OAG, and other interested persons.
September 8	Deadline for replies

On August 31, 2015, the Commission issued a notice extending the deadlines for 2015, at the request of the Department. Initial Comments are due September 4, and replies by September 10.

## II. PROCEDURAL BACKGROUND

Between June 18, 2015 and July 2, 2015, Form 481 filings were received from Eligible Telecommunications Carriers (ETCs) in receipt of high cost funding, seeking certification from the Commission that they had used and will use high cost support received from the

<sup>3</sup> Section 214(e) (6) provides for FCC designation of eligible telecommunications carriers in cases in which the carriers are not subject to the jurisdiction of a state commission.

<sup>4</sup> In the Matter of the Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order*, March 17, 2005, para.1.

Federal Universal Service Fund only for the provision, maintenance, and upgrading of facilities and services for which the support is intended (Attachment 1). In addition, between June 24, 2015 and July 20, 2015, the Lifeline-only ETCs listed in Attachment 2, subject to the reporting requirements of 47 C.F.R. 54.422, filed copies of their Form 481 filings submitted to the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC). Lifeline funding is provided to ETCs as reimbursement for service provided to existing Lifeline subscribers (reported by ETCs monthly to USAC), and is not subject to certification by the Commission. While the Department reviewed the Lifeline-only Form 481s and noted no deficiencies, the Lifeline-only Form 481s are provided to the Commission on an informational basis only. The Department does not address the Lifeline only filings in its comments.

### III. STATEMENT OF ISSUE

- Whether each of the petitioning carriers in receipt of high cost funding provided sufficient documentation for the Commission to certify that federal universal service high-cost support received in the previous year was used and that any federal universal service high-cost support received in the coming calendar year will be used only for the intended purposes.

### IV. DISCUSSION OF LAW AND POLICY

#### FEDERAL LAW

Section 254(e) of the Telecommunications Act states:

After the date on which Commission regulations implementing this section take effect, only an eligible telecommunications carrier designated under Section 214(e) shall be eligible to receive specific Federal universal service support. ***A carrier that receives such support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.*** Any such support should be explicit and sufficient to achieve the purposes of this section (emphasis added).

47 C.F.R. §54.202(a)(1)(ii) describes an initial service improvement plan and requires a five-year plan that describes ***with specificity*** proposed improvements or upgrades to the applicant's network throughout its proposed service area. Each applicant shall estimate the area and population that will be served as a result of the improvements (emphasis added).

47 C.F.R. §54.313 outlines the annual reporting requirements for high-cost funding recipients.<sup>5</sup>

47 C.F.R. §54.314, titled “Certification of Support for Eligible Telecommunications Carriers,” provides:

(a) *Certification.* States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers 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 this section.

## V. ANALYSIS

FCC rules require that any recipient of high cost universal service support file all information and certifications required by 47 C.F.R. 54.313 by July 1, 2015, and by July 1 in subsequent years with the FCC, the Universal Service Administrative Company (USAC), and relevant state commissions. USAC has created a detailed and comprehensive form (Form 481) for this purpose, which ETCs are required to use for their annual filings. States are required to file certifications pursuant to 47 CFR §54.314 by October 1.

### A. *THE CARRIERS’ SUBMISSIONS OF SERVICE QUALITY IMPROVEMENT PLANS AS REQUIRED BY 47 C.F.R. §54.313(A)(1)*

47 C.F.R. 54.313(a)(1) requires that rate of return recipients of high cost funding submit a progress report on its five-year service quality improvement plan pursuant to §54.202(a)(1)(ii), including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled in the prior calendar year.

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<sup>5</sup> The specific reporting requirements included in 47 C.F.R. 54.313 are set forth in Appendix A attached to the Departments’ comments.

47 C.F.R. 54.202(a)(1)(2) outlines the requirements for an initial service improvement plan. ETCs must submit a five-year plan that describes *with specificity* proposed improvements or upgrades to the applicant's network throughout its proposed service area, and should estimate the area and population that will be served as a result of the improvements. The initial service improvement plan should also demonstrate how high cost universal service funds were used to improve service, coverage, and capacity.

The Universal Service Administrative Company (USAC) has clarified that, with respect to the July 1, 2015 filings, the service improvement plan should include 2015 up to the filing date.<sup>6</sup>

Each of the rate of return ETCs receiving high cost support has submitted a five-year plan. Each carrier has provided an estimate of the area(s) and population that will be served as the result of any projected investments. All of the ETCs' plans describe USF support received and include, to the extent applicable, progress reports on the network improvements and upgrades proposed in 2014, as well as explanations to the extent that any targets set in 2014 were not met. Each carrier, provided information regarding how the funds were used to improve service, coverage, or capacity.

On May 1, 2014, the FCC waived the requirement for price cap recipients of frozen high support or incremental support<sup>7</sup> to file 5 year service improvement plans until July 1 of the year following the acceptance of Connect America Phase II funds. No Minnesota price cap carrier is required to file a service improvement plan in 2015.

**B. THE CARRIERS' SUBMISSIONS OF DATA REQUIRED BY 54.313(A)(2) - (A)(8) OF THE FCC'S RULES**

As required by 47 C.F.R. 54.313(a)(2)-(a)(4) (and Form 481), all of the petitioning carriers have provided information concerning outages, unfulfilled service requests, and complaints. Each of the carriers has provided the necessary certifications with respect to their

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<sup>6</sup> See USAC response 48 to Frequently Asked Questions on USAC's website, stating that "the progress report this year will cover 2015 up to the filing date. Next year's progress report, due July 1, 2016, will address calendar year 2015. The year after that, for the filing due July 1, 2017, the progress report would address calendar year 2016, etc. Though not required, carriers may note revisions to their plan for years 2016-2019 as part of the current progress report being submitted. <http://www.usac.org/hc/caf/about/faq/Filing-FCC-Form-481.aspx>.

<sup>7</sup> Minnesota price cap carriers include Frontier Communications of Minnesota, Inc. (Frontier), Citizens Telecommunications Company of Minnesota, LLC, Windstream Communications, Inc. (Windstream), Mankato Citizens Telephone Company dba Consolidated Communications (Mankato), Mid-Communications, and CenturyLink - including Qwest Corporation (Qwest), Embarq Minnesota, Inc.(Embarq), CenturyTel of Minnesota, Inc., CenturyTel of Chester, Inc., and CenturyTel of Chester, Inc.(collectively the CenturyLink Companies ).

compliance with applicable service quality and consumer protection standards,<sup>8</sup> and emergency functionality [47.54.313(a)(5) – (a)(6).] All carriers filed reports of their price offerings<sup>9</sup> (54.313(a)(7)) and provided statements as to their holding companies, operating companies, affiliates, and branding or “doing business as” (dba), as applicable (54.313(a)(8)).

*C. THE CARRIERS’ CERTIFICATIONS WITH RESPECT TO TRIBAL ENGAGEMENT (54.313(A)(9))*

Section 54.313(a)(9) requires ETCs, to the extent that they serve tribal lands, to provide information with respect to their tribal engagement obligations. All petitioning ETCs that serve Tribal lands have reported, using FCC Form 481, the extent to which they have engaged tribal governments in their plans to deploy broadband and voice service in tribal areas.

*D. CERTIFICATIONS WITH RESPECT TO PRICING OF VOICE SERVICES RELATIVE TO THE APPLICABLE NATIONAL AVERAGE [54.313(A)(10)]*

Section 54.313(a)(10) requires ETCs to certify that the pricing of their voice services are no more than 2 standard deviations above the applicable national average urban rate.<sup>10</sup> Each petitioning carrier has provided the required certification.

*E. RESULTS OF NETWORK PERFORMANCE TESTING [54.313(A)(11)]*

ETCs will be required to file, with their FCC Form 481s, results of network performance tests in future years. This requirement is not applicable in 2015.

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<sup>8</sup> The Department notes that Dunnell Telephone Company (Dunnell) initially [TRADE SECRET INFORMATION HAS BEEN EXCISED].

<sup>9</sup> ETCs are required to report their voice and broadband price offerings in effect as of January 1 of the reporting year. The Department noted certain deficiencies in Dunnell’s filing and requested clarification of Dunnell’s submission with respect to both its voice and broadband offerings. Dunnell provided the requested clarifications and replacement pages on September 2, 2015 as reflected in its response to Department information requests. Dunnell stated that it will also file the revision with USAC and the FCC. These revisions adequately address the Department’s concerns about Dunnell’s voice and broadband offerings. See Dunnell’s responses to Department IR #1, and IR #7.

<sup>10</sup> The national average urban rate for voice service is to be specified annually in a public notice issued by the FCC’s Wireline Competition Bureau, Wireless Telecommunications Bureau, and Office of Engineering and Technology. The national average urban rate is currently set at \$47.48.

*F. CERTIFICATIONS RELATED TO BROADBAND OBLIGATIONS*

Each ETC is required to provide a letter certifying that it is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time. All ETCs have provided the necessary certifications.<sup>11</sup>

Each petitioning ETC has reported the number, names, and addresses of community anchor institutions, if any, to which the ETC newly began providing access to broadband service in the preceding calendar year; and

*Price cap carriers that receive frozen high cost support (54.313(c)(1))*

Price cap carriers that receive frozen high cost support (FHCS) must provide certification that the support the company received was used and will be used in a manner consistent with the goal of achieving universal availability of voice and broadband. The certification is made at the holding company level. Frontier, Citizens, the CenturyLink companies (with the exception of Qwest) Windstream Corporation, Mankato and Mid-Communications receive frozen high cost support, and have filed the necessary certifications.

*Price cap carriers that receive high cost support to offset reductions in access charges (54.313(d))*

All price cap carriers that receive high cost support to offset reductions in access charges are required to certify that the support received pursuant to §54.304 in the prior calendar year was used to build and operate broadband-capable networks used to offer the provider's own retail service in areas substantially unserved by an unsubsidized competitor. Mid Communications, Mankato, and Windstream are subject to this requirement and have filed the required certifications.

*Recipients of Connect America Phase I incremental and Phase II support (54.313(b) and (e))*

Recipients of Connect America Phase I incremental support and Phase II support must provide certain certifications regarding their obligations to deploy broadband beginning, respectively two years and three years after acceptance of funding. Frontier and Citizens are

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<sup>11</sup> Dunnell provided a certification, and in response to the Department's information request's provided additional information with respect to its broadband offering to end users. The revised information resolves the Department's concerns about the certification.(See Dunnell response to the Department's IR #7)



the only carriers subject to this requirement in 2015, and have provided the necessary certifications.

G. *FINANCIAL REPORTS (54.313(F)(2))*

47 C.F.R. 54.314(f)(2) requires that privately held rate of return carriers submit a full and complete report of the company's financial condition and operations as of the previous year (2014). Recipients of loans from the Rural Utilities Service (RUS) must submit copies of their RUS Operating Report for Telecommunications Borrowers (RUS Report) as filed with the RUS. Carriers that are not recipients of loans from the RUS, and whose financial statements are audited in the ordinary course of business, must submit a copy of their *audited* financial statements. All other privately held rate of return carriers must submit either 1) copies of their financial statements which have been subject to review by an independent certified public accountant, 2) a financial report in a format that is comparable to the RUS report that *has been subjected to review by an independent certified public accountant*, or a financial report in a format that is comparable to the RUS report *with the underlying information subjected to a review by a review by an independent certified public accountant*.

All carriers subject to this requirement, with the exception of Dunnell, filed copies of their audited or reviewed financial statements as required. Dunnell filed a financial report that had not been audited or subjected to a review by subject to review by an independent certified public accountant, and provided a certification signed by its president Charles Mattingly, stating:

**[TRADE SECRET INFORMATION HAS BEEN EXCISED].**

Notably Dunnell did not provide a date by which it would provide reviewed financial statements and a CPA letter. The Department notes that currently Dunnell is not in compliance with 47 C.F.R Section 513(f)(2) . The Department has additional concerns about Dunnell's financial statements, as expressed in Appendix B.

*AREAS WITH NO TERRESTRIAL BACKHAUL (54.313(G))*

Carriers without access to terrestrial backhaul that are compelled to rely exclusively on satellite backhaul in their study area must file annual certifications 1) that no terrestrial backhaul options exist, and 2) that they offer broadband service at actual speeds of at least 1 Mbps downstream and 256 kbps upstream within the supported area served by satellite middle-mile facilities. ETCs have provided the necessary certification to the extent that it is applicable.

*H. RATES AND LINE COUNTS FOR RESIDENTIAL LOCAL SERVICE [54.313(H)]*

47 C.F.R. 54.313(h) requires that high-cost recipients report to the FCC all of their rates for residential local service for all portions of their service area, as well as state fees to the extent the sum of those rates and fees are below the FCC's established rate floor, and the number of lines for each rate specified. Only incumbent local exchange carriers (ILEC) that are ETCs are required to file their local residential rates. All ILEC ETCs have filed the "Rate Floor Data Collection Form," as required.<sup>12</sup>

**VI. COMMISSION OPTIONS**

The Department believes that the petitioning carriers listed in Attachment 1 have generally provided adequate information and a sufficient level of detail as to how high cost funds have been used, to fulfill the requirements implemented by the FCC in the CAF-ICC and subsequent orders. Although the Department continues to have concerns about the information provided (or not provided) by Dunnell, the Department has tentatively included Dunnell on the Attachment 1 list. The Department believes that if Dunnell files sufficient information as outlined in Appendix B, the Commission could reasonably certify that Dunnell has used and will use high cost funds appropriately.

**VII. COMMISSION OPTIONS**

- A. Certify that all of the petitioning ETCs listed in Attachment 1 have used Federal High Cost Universal Service Support received in 2014 and the first half of 2015, and will use Federal High Cost Universal Service Support received in the coming year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
- B. Find that some or all of the petitioning ETCs have failed to provide sufficient information to certify that the high cost support provided to the petitioning ETC(s) in 2014 and the first half of 2015, and will be used in 2016 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Deny some or all of the ETCs' petitions for certification.

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<sup>12</sup> The Department notes that while Dunnell did include the Rate Floor Data Collection Form with its Form 481, **[TRADE SECRET INFORMATION HAS BEEN EXCISED]**. Dunnell has fulfilled the requirements of 47 C.F.R. 54.313(h).

## VIII. RECOMMENDATION

The Department recommends Alternative A, provided that Dunnell provides the additional clarifying information outlined in Appendix B, prior to the Commission's hearing in this matter. The Commission should certify, based on the representations and certifications provided by the carriers, that the high cost support provided in 2014 and the first half of 2015 to the petitioning ETCs listed in Attachment 1 was used, and will be used in the coming year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

/ja

(Appendix B)

**PUBLIC COPY**

**(TRADE SECRET DATA HAS BEEN EXCISED)**

## **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  
Public Comments and Appendix B**

**Docket No. P999/PR-15-8**

**Dated this 4<sup>th</sup> day of September 2015**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-8_P999-PR-15-8
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000  Owatonna, MN 55060	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Issa	Asad	issa@QuadrantHoldings.com	Q Link Wireless LLC	499 E Sheridan St Ste 400  Dania Beach, FL 33004	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Sam	Bailey	Sam.Bailey@iwirelesshome.com	i-Wireless	1 Levee Way Ste 3104  Newport, KY 41071	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Dianne	Barthel	Dianne.barthel@centurylink.com	Centurylink Communications, LLC	200 South Fifth Street Room 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
David	Bickett	dave.bickett@parkregion.com	Otter Tail Telcom	PO Box 277 100 Main St Underwood, MN 56586	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW  Perham, MN 56573	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd  Mound, MN 55364-1652	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
John	Bokelmann	manchester@deskmedia.com	Manchester Heartland	204 Railroad St  Manchester, MN 56007-5012	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Kathy	Boutwell	kathyb@chriscomco.net	Christensen Communications Co	104 Main Street West  Madelia, MN 56062	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8

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Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Danny	Busche	N/A	Minnesota Valley Telephone Company	318 Second Ave East P O Box 310 Franklin, MN 55333-0310	Paper Service	No	OFF_SL_15-8_P999-PR-15-8
Mary	Calderon	mary.calderon@tagmobile.com	Tag Mobile, L.L.C.	1330 Capital Pkwy  Carrollton, Texas 75006	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Thomas	Campbell	tcampbell@otcpas.com	Olsen Thielen	2675 Long Lake Road  St. Paul, MN 55309	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Andrew	Carlson	acarlson@briggs.com	Briggs And Morgan	2200 IDS Center80 South Eighth Street  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Elaine	Divelbliss	elaine.Divelbliss@virginmobileusa.com	Virgin Mobile USA, L.P.	10 Independence Blvd  Warren, NJ 07059	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Melissa	Driskell	melissa.driskell@telrite.com	Telrite Corporation	4113 Monticello St  Covington, GA 30014	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
David L.	Dunning	ddunning@polartel.com	Polar Communications Mutual Aid Corporation	110 4th St E  Park River, ND 58270	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8

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Kristen	Farole	kfarole@terracominc.com	TerraCom, Inc.	401 E Memorial Rd Ste 400  Oklahoma City, OK 73114	Electronic Service	No	OFF_SL_15-8_P999-PR- 15-8
Erin	Feikema	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd AvePO Box 127  Lismore, MN 56155	Electronic Service	No	OFF_SL_15-8_P999-PR- 15-8
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd  Columbus, OH 43231-5931	Electronic Service	No	OFF_SL_15-8_P999-PR- 15-8
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	OFF_SL_15-8_P999-PR- 15-8
Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	OFF_SL_15-8_P999-PR- 15-8
Shari	Flanders	sflanders@polartel.com	Polar Communications	PO Box 270  Park River, ND 58270	Electronic Service	No	OFF_SL_15-8_P999-PR- 15-8
William	Haas	william.haas@t-mobile.com	T-Mobile USA, Inc.(PARTY)	2001 Butterfield Rd  Downers Grove, IL 60515	Electronic Service	No	OFF_SL_15-8_P999-PR- 15-8
Roxi	Hacker	roxih@interstatetelcom.com	Interstate Telcom Consulting	130 Birch Avenue West  Hector, Minnesota 55342	Electronic Service	No	OFF_SL_15-8_P999-PR- 15-8



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Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1700 Technology Dr Ste 100  Willmar, MN 56201	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Donna	Heaston	Donna.Heaston@IntegraTelecom.com	Integra Telecom of MN, Inc	6160 Golden Hills Drive  Golden Valley, MN 55416	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Kent	Hedstrom	kent@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Stephen	Hegdal	N/A	Frontier Communications of Minnesota, Inc.	14450 Burnhaven Drive  Burnsville, MN 55306	Paper Service	No	OFF_SL_15-8_P999-PR-15-8
Jerry	Heiberger	jerry.heiberger@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920  Clear Lake, SD 57226	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Paul	Hoge	phoge@crosslake.net	Crosslake Communications	35910 County Road 66 PO Box 70 Crosslake, MN 56442	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
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_15-8_P999-PR-15-8
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Dwayne	Johnson	jtcbusiness@means.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St  Albany, MN 56307-8322	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St  Ruthton, MN 56170	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street  Lake Mills, IA 50450	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-8_P999-PR-15-8
Mary	Lohnes	mary_lohnes@mmi.net	Midcontinent Communications	3901 N Louise Ave  Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
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	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Tom	Maroney	tmaroney@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Monty	Morrow	montymorrow@nu-telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Lyndall	Nipps	lyndall.nipps@windstream.com	Windstream	655 W. Broadway, Ste. 850  San Diego, CA 92101	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Robert	Olson	rolson@emily.net	Emily Cooperative Telephone Company	PO Box 100  Emily, MN 564470100	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Craig	Otterness	otter@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road  Madison, WI 53717	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive  Burnsville, MN 55306	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Kris	Rademacher	krisr@farmerstel.net	Farmers Mutual Telephone Co.	301 2nd St S  Bellingham, MN 562120369	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
M.	Ray	cecilia.ray@lawmoss.com	Moss & Barnett	Suite 1200 150 S. 5th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Julia	Redman Carter	jrcafter@readywireless.com	Boomerang Wireless LLC	955 Kacena Rd Ste A  Hiawatha, IA 52233	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Carrie	Rice	Carrie.Rice@enventis.com	Enventis Telecom, Inc.	221 E Hickory St  Mankato, MN 56001-3610	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25  Wawina, MN 557369721	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Mark	Roach	mark.roach@ctctelcom.net	Consolidated Telephone Company	1102 Madison Street PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW  Rice, MN 56367	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW  Perham, MN 56573	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 126 South Main Street Lonsdale, MN 55046-0358	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Gregory	Springer	greg.springer@ctctelcom.net	C-I Communications, Inc.	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Kimberly	Starr	kim@vncenterprises.com	Dunnell Telephone Company	P. O. Box 733  Judson, Texas 75660	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Wayne	Stowman	wstowman@rtelnet.net	Rothsay Telephone Company	137 1st St NW  Rothsay, MN 56579	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East CedarP.O. Box 360  Houston, MN 559430360	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St  Lake Mills, IA 50450	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Lorren	Tingesdal	lorren@mabeltel.coop	Harmony Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW  Kasson, MN 55944	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277  Upsala, MN 56384	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
David	Wareikis	dwareikis@bluejaywireless.com	Blue Jay Wireless, LLC	5010 Addison Circle  Addison, TX 75001	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-8_P999-PR-15-8
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N  Brandon, MN 56315	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8
Lezlie	Young	lezlie.p.young@windstream.com	Talk America Inc.	10802 Executive Center Dr  Little Rock, AR 72211	Electronic Service	No	OFF_SL_15-8_P999-PR-15-8

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	SPL_SL_13-8_ETC for P999.PR-13-8
Issa	Asad	issa@QuadrantHoldings.com	Q Link Wireless LLC	499 E Sheridan St Ste 400  Dania Beach, FL 33004	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Sam	Bailey	Sam.Bailey@iwirelesshome.com	i-Wireless	1 Levee Way Ste 3104  Newport, KY 41071	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jim	Beattie	N/A	Easton Telephone Co. dba BEVCOMM	123 West 7th Street  Blue Earth, MN 56013	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jim	Beattie	N/A	Granada Telephone Company dba BEVCOMM	123 W 7th St.  Blue Earth, MN 56013	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jim	Beattie	N/A	Pine Island Telephone Company dba BEVCOMM	123 W 7th St  Blue Earth, MN 56013	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jim	Beattie	N/A	Cannon Valley Telecom, Inc.	123 W 7th St  Blue Earth, MN 56013	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jim	Beattie	N/A	Blue Earth Valley Telephone Co.	123 West 7th Street  Blue Earth, MN 56013	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jim	Beattie	N/A	Eckles Telephone Company dba BEVCOMM	123 West 7th Street  Blue Earth, MN 56013	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Bickett		Valley Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Bickett		Park Region Mutual Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Birkholz	N/A	Home Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Mark	Birkholz	N/A	Clements Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Mark	Birkholz	N/A	Osakis Telephone	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Mark	Birkholz	N/A	Melrose Telephone Company	150 Second St. SW Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Scott	Bohler	scott.bohler@fr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Kathy	Boutwell	kathyb@chriscomco.net	Christensen Communications Co	104 Main Street West Madelia, MN 56062	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Danny	Busche	N/A	Minnesota Valley Telephone Company	318 Second Ave East P O Box 310 Franklin, MN 55333-0310	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Mary	Calderon	mary.calderon@tagmobile. com	Tag Mobile, L.L.C.	1330 Capital Pkwy Carrollton, Texas 75006	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Elaine	Divelbliss	elaine.Divelbliss@virginmobileusa.com	Virgin Mobile USA, L.P.	10 Independence Blvd  Warren, NJ 07059	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Misty	Drake	misty.drake@telrite.com	Telrite Corporation	4113 Monticello St Ste 330  Covington, GA 30014	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David L.	Dunning	N/A	Wolverton Telephone Company	PO Box 270  Park River, ND 58270	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Robin	Enkey	robine@budgetprepay.com	Budget PrePay, Inc. dba Budget Phone	1325 Barksdale Blvd Ste 200  Bossier City, LA 71111-4600	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Donna	Eul	donnaeul@fedtel.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Kristen	Farole	kfarole@terracominc.com	TerraCom, Inc.	401 E Memorial Rd Ste 400  Oklahoma City, OK 73114	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Erin	Feikema	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd AvePO Box 127  Lismore, MN 56155	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd  Columbus, OH 43231-5931	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Shari	Flanders	sflanders@polartel.com	Polar Communications	PO Box 270  Park River, ND 58270	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
William	Haas	N/A	T-Mobile Central, LLC	601 Pennsylvania Av. NW Ste 800  Washington, DC 20004-2710	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
JoAnn	Hanson	joann.hanson@centurylink.com	CenturyLink	200 S 5th St Ste 2200  Minneapolis, MN 55402	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Bruce	Hanson	N/A	Zumbrot Telephone Company	1700 Technology Dr Ste 100  Willmar, MN 56201	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1700 Technology Dr Ste 100  Willmar, MN 56201	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Bruce	Hanson	N/A	Starbuck Telephone Company	1700 Technology Dr Ste 100  Willmar, MN 56201	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Bruce	Hanson	N/A	Clara City Telephone Company	1700 Technology Dr Ste 100  Willmar, MN 56201	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Donna	Heaston	Donna.Heaston@IntegraTelecom.com	Integra Telecom of MN, Inc	6160 Golden Hills Drive  Golden Valley, MN 55416	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kent	Hedstrom	kent@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jerry	Heiberger	jerry.heiberger@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920  Clear Lake, SD 57226	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Paul	Hoge	phoge@crosslake.net	Crosslake Communications	35910 County Road 66 PO Box 70 Crosslake, MN 56442	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Dwayne	Johnson	jtcbusiness@means.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St  Albany, MN 56307-8322	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St  Ruthon, MN 56170	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street  Lake Mills, IA 50450	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Mary	Lohnes	mary_lohnes@mmi.net	Midcontinent Communications	3901 N Louise Ave  Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
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	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Maroney	tmaroney@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Monty	Morrow	montymorrow@nu-telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Lyndall	Nipps	lyndall.nipps@windstream.com	Windstream	655 W. Broadway, Ste. 850  San Diego, CA 92101	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Robert	Olson	rolson@emily.net	Emily Cooperative Telephone Company	PO Box 100  Emily, MN 564470100	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Craig	Otterness	otter@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road  Madison, WI 53717	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive  Burnsville, MN 55306	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Kris	Rademacher	krisr@farmerstel.net	Farmers Mutual Telephone Co.	301 2nd St S  Bellingham, MN 562120369	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Julia	Redman Carter	jrccarter@readywireless.com	Boomerang Wireless LLC	955 Kacena Rd Ste A  Hiawatha, IA 52233	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carrie	Rice	Carrie.Rice@enventis.com	Enventis Telecom, Inc.	221 E Hickory St  Mankato, MN 56001-3610	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Robert	Riddell		Wilderness Valley Telephone Co. Inc.	13448 Co. Rd. 25  Wawina, MN 557369721	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25  Wawina, MN 557369721	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Mark	Roach	mark.roach@ctctelcom.net	Consolidated Telephone Company	1102 Madison Street PO Box 972 Brainerd, MN 56401	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW  Rice, MN 56367	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Schornack	N/A	Callaway Telephone Company	150 Second Street SW  Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Schornack	N/A	The Peoples Telephone Company of Bigfork	150 2nd St. SW  Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW  Perham, MN 56573	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Schornack	N/A	Loretel Systems, Inc.	150 Second Street SW  Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Schornack	N/A	East Otter Tail Telephone Company	150 2nd Street SW  Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Schornack	N/A	Arrowhead Communications Corporation	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Schornack	N/A	Felton Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Schornack	N/A	Twin Valley-Ulen Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 126 South Main Street Lonsdale, MN 55046-0358	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Gregory	Springer	greg.springer@ctctel.com	C-I Communications, Inc.	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Wayne	Stowman	wstowman@rtelnet.net	Rothsay Telephone Company	137 1st St NW Rothsay, MN 56579	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East Cedar P.O. Box 360 Houston, MN 559430360	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Lorren	Tingesdal	lorren@mabeltel.coop	Harmony Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW  Kasson, MN 55944	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277  Upsala, MN 56384	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Wareikis	dwareikis@bluejaywireless.com	Blue Jay Wireless, LLC	5010 Addison Circle  Addison, TX 75001	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N  Brandon, MN 56315	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8
Lezlie	Young	lezlie.p.young@windstream.com	Talk America Inc.	10802 Executive Center Dr  Little Rock, AR 72211	Electronic Service	No	SPL_SL_13-8_ETC for P999.PR-13-8