

May 7, 2019

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: **Comments of the Minnesota Department of Commerce**  
Docket No. P999/M-19-20

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

2018 Lifeline Recertification Results

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the 2018 Lifeline re-certification filings. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ BRUCE L. LINSCHIED  
Financial Analyst

BLL/ja  
Attachment

## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce

Docket No. P999/M-19-20

#### I. BACKGROUND

##### A. LIFELINE REFORM ORDER

On February 6, 2012, the Federal Communications Commission (FCC) released its Lifeline and Linkup Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 11-42, 03-109, 12-23 and CC Docket No. 96-45 (Lifeline Reform Order). The federal Lifeline program initially subsidized local telecommunications service, but the Lifeline Modernization Order (see I.C. below) extended Lifeline subsidies to broadband (internet) services provided to qualified low-income consumers by service providers designated as “eligible telecommunications carriers” (ETCs).<sup>1</sup> Lifeline subscribers qualify with a household income at or below 135 percent of the Federal Poverty Guidelines,<sup>2</sup> or receipt from at least one of a number of federal assistance programs.<sup>3</sup> Lifeline provides a monthly discount of \$9.25,<sup>4</sup> and an additional \$25.00 for Lifeline service from a facilities based provider to qualifying residents of Tribal lands.<sup>5</sup> In addition, incumbent local exchange carriers (ILECs) do not apply the access recovery charge (ARC) to Lifeline customers.<sup>6</sup> Link-Up provides a 100 percent reduction, up to \$100, off installation charges to qualifying residents of Tribal lands.<sup>7</sup>

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<sup>1</sup> Under the Federal Telecommunications Act of 1996, telecommunications carriers must be designated “eligible telecommunications carriers,” or ETCs to qualify for subsidies from the federal Universal Service Fund (47 U.S.C. §254 (e)). Lifeline benefits were extended to broadband services as a result of Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Order and Memorandum Opinion and Order, (FCC 15-71) rel. June 22, 2015, para. 14; and 47 C.F.R. 54 C.F.R. § 54.104(a).

<sup>2</sup> 47 C.F.R. § 54.409(a) (1).

<sup>3</sup> 47 C.F.R. § 54.409(a) (2).

<sup>4</sup> 47 C.F.R. §54.403 (a) (1). Support levels for either stand-alone voice service or voice service not bundled with broadband subject to the minimum service standards set forth in §54.408 will decline to \$7.25 per month on December 1, 2019, to \$5.25 per month on December 1, 2020, and to zero on December 1, 2021 (54.403(a)(2)). The minimum services standard for fixed broadband speed is 10 Megabits per second and downstream/1 Megabit per second upstream, and a usage allowance of 50 gigabytes per month; and the minimum service standard for mobile broadband speed and data usage allowance for December 1, 2018 until November 30, 2019 is a speed of 3G and a data usage allowance of 2 gigabytes per month. The minimum service standard for mobile voice service on and after December 1, 2018 will be 1000 minutes (54.408(b) (1), (2), and (3)).

<sup>5</sup> 47 C.F.R. §54.403 (a) (3).

<sup>6</sup> Lifeline Reform Order, para. 852. Carriers may not charge an ARC on any Lifeline customer. For residential/single-line business customers the monthly ARC charge cannot exceed \$3.00 per line for residential/single-line business customers for a total of \$6.00 per line in the sixth year, provided that: (1) such increases would not result in regulated residential end-user rates that exceed the \$30 Residential Rate Ceiling . . .

<sup>7</sup> 47 C.F.R. §54.413 (a) (1).

## B. TELEPHONE ASSISTANCE PLAN

A complement to the federal Lifeline program is Minnesota's Telephone Assistance Plan (TAP), which is a required offering by local service providers that are certified by the Commission to provide local exchange service in Minnesota.<sup>8</sup> The TAP program currently provides a bill credit of \$3.50/month to low-income consumers that meet the eligibility criteria used by the Lifeline program.<sup>9</sup> Effective July 1, 2019, the monthly TAP credit increases to \$7.00 and the TAP surcharge increases from \$.03<sup>10</sup> to \$.10.<sup>11</sup>

The Lifeline program and its annual recertification process is integral and critical to Minnesota's Telephone Assistance Plan (TAP). Customers that enroll in Lifeline are now required by the Commission to be auto-enrolled in TAP if the customer subscribes to voice service.<sup>12</sup> Similarly, when a customer is de-enrolled from Lifeline the customer is also de-enrolled from TAP. Unlike the Lifeline program, customers of standalone broadband service are not eligible for the TAP credit.<sup>13</sup> ETCs are required to offer standalone voice service,<sup>14</sup> but unless the technology used to provide voice service is subject to the Commission's jurisdiction, voice service providers are not required to collect and remit TAP fees or provide the TAP credit to customers that are eligible for Lifeline service.<sup>15</sup>

Local telephone service providers, including incumbent local exchange carriers (ILECs) and competitive local exchange carriers (CLECs), must offer TAP in Minnesota.<sup>16</sup> Local exchange carriers are defined as a telephone company or telecommunications carrier providing local exchange service.<sup>17</sup> A radio common carrier, or an entity providing any mobile telecommunications service by means of radio signals and connection to a telephone network,<sup>18</sup> does not receive a certificate of authority from the Commission and does not offer TAP. Fixed wireless providers are not mobile and the provision of local telephone service via fixed wireless technology does not meet the statutory definition of "radio common carrier."

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<sup>8</sup> Minn. Stat. §237.70, subd. 2.

<sup>9</sup> Minn. Stat. § 237.10, subd. 4a.

<sup>10</sup> Commission Order, Docket No. P999/CI-13-213, July 10, 2013, p. 5, Ordering Paragraph 1.

<sup>11</sup> In the Matter of Telephone Assistance Plan Review, ORDER SETTING TAP CREDIT AMOUNT AND SURCHARGE LEVEL AND REQUIREING LOCAL SERVICE PROVIDERS TO INCLUDE TAP INFORMATION ON THEIR WEBSITES, Docket Nos. P-999/CI-17-677 and P-999/CI-18-112, January 15, 2019, Ordering Para. 6, p. 4.

<sup>12</sup> ORDER CLARIFYING RELATIONSHIP BETWEEN LIFELINE AND TAP, AND MAINTAINING CURRENT TAP CREDIT AND SURCHARGE LEVELS, P-999/CI-16-302, October 11, 2016, p.6, Ordering Para. 1,

<sup>13</sup> Minnesota Public Utilities Commission Order Clarifying Relationship between Lifeline and TAP, and Maintaining Current TAP Credit and Surcharge Levels, issued October 11, 2016 in Docket No. P-999/CI-16-302, Ordering Para. 2.

<sup>14</sup> *In Re: Connect America Fund...*, 26 FCC Rcd. 17,663 (Nov 18, 2011)(the "USF Transformation Order") at ¶ 80 and FN 117. (The FCC stated there: "With respect to "standalone service," we mean that consumers must not be required to purchase any other services (e.g., broadband) in order to purchase voice service. "

<sup>15</sup> Order Denying Reconsideration, Docket No. P999CI-18-634, March 22, 2019.

<sup>16</sup> Minn. R. 7812.0100, subp. 34.

<sup>17</sup> Minn. Stat. §237.01, subd. 8.

<sup>18</sup> Minn. Stat. §237.01 subds. 4 & 7.

### C. LIFELINE MODERNIZATION ORDER

On April 27, 2016, the FCC issued its Third Report and Order, Further Report and Order, and Order on Reconsideration (the Lifeline Modernization Order),<sup>19</sup> that included the following provisions:

- The Lifeline eligibility criteria were modified.<sup>20</sup>
- The revised recertification rule (47 CFR § 54.410(f)) states that if the subscriber's program-based or income-based eligibility for Lifeline cannot be determined by accessing one or more state databases . . . , then the National Verifier (NV), state Lifeline administrator, or state agency may obtain a signed certification from the subscriber . . .<sup>21</sup> The two state programs that are Lifeline eligible are Medicaid and SNAP, which are both administered by the Minnesota Department of Human Services (DHS).<sup>22</sup>
- The NV shifts the responsibility for determining a subscriber's Lifeline eligibility from phone and internet service providers to the program's administrator, the Universal Service Administrative Company (USAC). The NV will establish whether a consumer is eligible by electronically querying state and federal data sources, and if necessary, manually reviewing supportive documents.<sup>23</sup> The NV is being deployed in batches of states:
  - 1) First launch- In June 2018, the NV has launched in the states of Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming.<sup>24</sup>
  - 2) Second launch- In October 2018, the NV was launched in Guam, Hawaii, Idaho, New Hampshire, North Dakota, and South Dakota.<sup>25</sup>

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<sup>19</sup> In the Matter of Lifeline and Link UP Reform and Modernization (WC Docket No. 11-42), Telecommunications Carriers Eligible for Universal Service Support (WC Docket No. 09-197), and Connect America Fund (WC Docket No. 10-90), **THIRD REPORT AND ORDER, FURTHER REPORT AND ORDER ON RECONSIDERATION**, Adopted March 31, 2016, Released April 27, 2016 (The Lifeline Modernization Order).

<sup>20</sup> *Id.* 47 U.S.C. §54.409(a) and (b). Consumer's household income must be at or below 135% of the Federal Poverty Guidelines for a household of that size, or receive benefits from one of the following federal assistance programs: Medicaid, Supplemental Nutrition Assistance Program, Supplemental Security Income, Federal Public Housing Assistance, or Veterans and Survivors Pension Benefit. An eligible resident of Tribal lands meets the qualifications for Lifeline if the consumer's household participates in one of the following Tribal-specific federal assistance programs: Bureau of Indian Affairs general assistance, Tribally Administered Temporary Assistance for Needy Families; Head Start for households meeting its income qualifying standard, or the Food Distribution Program on Indian Reservations.

<sup>21</sup> *Op cit.* FN 19, 47CFR § 54.4210(f)(2)(iii) and (3)(iii).

<sup>22</sup> Lifeline, Verify Subscriber Eligibility, State Eligibility Verification Processes, Minnesota, USAC, <https://www.usac.org/li/program-requirements/verify-eligibility/process-by-state.asp>.

<sup>23</sup> *Op cit.* FN 19, 47CFR § 54.410(h), p. 178.

<sup>24</sup> National Verifier Launches – National Verifier - Lifetime Program - USAC.org, Lifeline, National Verifier Launches, <https://www.usac.org/li/tools/national-verifier/lauches/2018/une.aspx>, April 29, 2019

<sup>25</sup> *Id.*

- 3) Third launch- In December 2018, the NV was launched in Missouri, North Carolina, Pennsylvania, or Tennessee.<sup>26</sup>
- 4) Fourth launch- In February 2019, the NV was soft launched in Alaska, American Samoa, District of Columbia, Maine, Northern Marianas Islands, Rhode Island, and the Virgin Islands.<sup>27</sup>
- 5) Fifth launch- On March 12, 2019, the NV was soft launched in Indiana, Kentucky and Michigan.<sup>28</sup>

#### *D. COMMISSION ACTION*

On June 14, 2012, the Commission issued its order in Docket No. P-999/M-12-194 in which it directed ETCs to implement the FCC's Lifeline certification and annual re-certification requirements described in the Lifeline Reform Order. Subsequent orders were issued in 2013, 2014, 2015, 2016 and 2017 in Docket Nos. 12-1315, 14-20, 15-20, 16-20, 17-20 and 18-20 to reflect the requirements of the Lifeline Reform and Modernization Orders, and they required ETCs to submit the results of their annual Lifeline re-certification efforts. ETCs submit the results of their re-certification efforts on FCC Form 555, and the Department reports the results of each year's survey.

## **II. STATEMENT OF ISSUES**

What actions, if any, should the Commission take with respect to the Lifeline re-certification filings submitted by ETCs for 2018?

## **III. APPLICABLE LAW**

47 C.F.R § 54.410 (d) and (f) (*"Annual eligibility re-certification process"*)

(d) *Eligibility certification form.* Eligible telecommunications carriers and state Lifeline administrators or other state agencies that are responsible for the initial determination of a subscriber's eligibility for Lifeline must provide prospective subscribers Lifeline certification forms that provide the information in paragraphs (d) (1) through (3) of this section in clear, easily understood language. If a Federal eligibility certification form is available, entities enrolling subscribers must use such form to enroll a qualifying low-income consumer into the Lifeline program.

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<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> *Id.*

(f) Subpart (1) requires that all ETCs must annually re-certify all Lifeline subscribers 12 months after the subscriber's service initiation date and every 12 months thereafter, except for subscribers in states where the National Verifier, state Lifeline administrator, or other state agency is responsible for annual re-certification of subscribers' Lifeline eligibility.

(f) Subpart (2) describes the methods by which an ETC must confirm a subscriber's eligibility to receive Lifeline benefits.

(f) Subpart (5) provides that "if an eligible telecommunications carrier is unable to re-certify a subscriber . . . , the eligible telecommunications carrier must comply with the de-enrollment requirements provided for in § 54.405(e) (4)."

47 C.F.R. §54.405 (e) (4) ("*De-enrollment for failure to re-certify*") provides that:

[A]n eligible telecommunications carrier must de-enroll a Lifeline subscriber who does not respond to the carrier's attempts to obtain re-certification of the subscriber's continued eligibility as required by § 54.410(f); who fails to provide the annual one-per-household re-certifications as required by § 54.410(f).

And requires that:

Prior to de-enrolling a subscriber under this paragraph, the eligible telecommunications carrier must notify the subscriber in writing separate from the subscriber's monthly bill, if one is provided using clear, easily understood language, that failure to respond to the re-certification request within 60 days of the date of the request will trigger de-enrollment. If a subscriber does not respond to the carrier's notice of impending de-enrollment, the carrier must de-enroll the subscriber from Lifeline within five business days after the expiration of the subscriber's time to respond to the re-certification efforts.

47 C.F.R. §54.405 (e) (5) Service providers must de-enroll a subscriber who has requested de-enrollment within two business days

47 C.F.R. §54.416(b) ("*Annual certifications by eligible telecommunications carriers*") requires that:

All eligible telecommunications carriers must annually provide the results of their re-certification efforts, performed pursuant to § 54.410(f), to the [Federal Communications] Commission and the Administrator. Eligible telecommunications carriers designated as such by one or more states pursuant to § 54.201 must also provide,

on an annual basis, the results of their re-certification efforts to state commissions for subscribers residing in those states where the state designated the eligible telecommunications carrier. Eligible telecommunications carriers must also provide their annual re-certification results for subscribers residing on Tribal lands to the relevant Tribal governments.

**IV. ANALYSIS**

**A. Yearly comparison of re-certification data**

The 2018 re-certification results were submitted by ETCs to comply with Paragraph 148 of the FCC’s Lifeline Reform Order and Section 47 C.F.R. 54.416(b) of the FCC’s Rules. The revised FCC Form 555 used to report re-certification results in 2017 was used again in 2018. On July 1, 2017, ETC service providers were required to recertify all subscribers on a rolling basis according to their anniversary dates, or every 12 months from the customers’ service initiation dates. The results of the 2018 recertification effort and those of prior years are summarized below and taken from Attachment 1, page 7:

Subscribers to be Recertified (a) Col. C	State Database Recertified (b) Col. D	Direct Contact By ETC (c) Col. F (% = d/a)	Direct Contact De-enrolled (d) Col. G	Third Party/USAC Contacted (e) Col. I (% = f/e)	Third Party/USAC De-enrolled (f) Col. K	Total Subscribers De-enrolled (g) Col. M (% = g/a)	Percent of Subscribers De-enrolled (h) Col. O
<b>2018</b>							
63,808	2,441	47,335	10,132 21.40%	14,032	4,983 35.51%	15,115	23.69%
<b>2017</b>							
28,989	1,813	22,080	5,690 25.77%	5,096	2,130 41.80%	7,820	26.98%

The 2012 – 2016 results are presented in the previous format of FCC Form 555 format submitted by ETCs and summarized as follows.

Subscribers to be Re-certified	Subscribers Contacted Directly	Responding Subscribers	Non-responding Subscribers	Ineligible Subscribers Contacted Directly	Subscribers De-enrolled Contacted Directly	Subscribers reviewed by DHS/USAC	Subscribers De-enrolled by DHS/USAC	Total Subscribers De-enrolled
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			(d = b-c)		(f = d+e)			(i = f+h)
				(% = e/b)	(% = (f/b))		(% = h/g)	(% = (i/a))
<b>2016</b>								
60174	43629	35216	8412	191	8603	16983	1110	9713
			19.3%	.44%	19.7%		6.5%	16.02%
<b>2015</b>								
56354	47709	37469	10219	231	10450	9033	1061	11511
			21.4%	.5%	21.9%		11.7%	20.29%
<b>2014</b>								
64509	58458	37818	20640	646	21286	7720	2413	23699
			35.3%	1.1%			31.3%	35.81%
<b>2013</b>								
63302	39002	31018	7983	641	8624	4803	1811	10435
			20.5%	1.6%	22.1%		37.7%	16.48%
<b>2012</b>								
72327	70615	30440	30140		30599	1712	253	30852
			42.7%		43.3%		14.8%	42.66%

**B. What observations emerge from the results of the 2018 re-certification efforts?**

1. Lifeline subscribership in 2018 was approximately the same as the average subscribership since the Lifeline Reform Order was implemented.

Lifeline subscribers requiring recertification dipped to 28,989 in 2017 when the method of counting subscribers changed (see Section IV.A. of these comments, column (a) above for 2018 and 2017). Recertification was not required from: 1) January through June, 2017, when all previous years' recertifications were based upon December 31 subscriberships, and 2) the time when subscribership has been based upon rolling recertification for subscribers with anniversary dates beginning July 1, 2017. Lifeline subscribership was counted for the last half year of 2017, but Lifeline subscribers in 2018 included all subscribers with anniversary dates



from January 1 through December 31, 2018. The following table shows the dip in Lifeline subscribers in 2017.

<u>Year</u>	<u>Subscribers to Recertify</u>
2018	63808
2017	28,989
2016	60,174
2015	56,354
2014	64,509
2013	63,302
2012	72,327

Subscribership has remained stable at approximately 60,000 since 2013. Excluding the first year results of the Lifeline Reform Order and the half-year results in 2017, the average subscribership over the remaining five years was 61,629. When 2012 subscribership is included, the average subscribership is 63,412, and when the 2017 subscribership is added, the average is 58,495.

2. The 2018 de-enrollment rate is approximately the same as the average rate for the last six or seven years.

The 2018 de-enrollment rate of 23.69 % declined from the 2017 de-enrollment rate of 26.98% (see Section IV.A, column (h) above for 2018 and 2017). The 2018 rounded de-enrollment rate of 24% is close to the average rounded de-enrollment rate over the last six or seven years of 23% and 26% ((2018 24% + 2017 27% +2016 16% + 2015 20% + 2014 36% + 2013 16%)/6 years = 23% average; + 2012 43%/7 years = 26% average, see Section IV.A, column (h) above).

Lifeline subscribers and annual de-enrollment rates from 2012 – 2018.

<u>Year</u>	<u>De-enrollment Rate/ subscribers</u>
2018	23.69% or 15,115
2017	26.98% or 7,820
2016	16.02% or 9,713
2015	20.29% or 11,511
2014	35.81% or 23, 699
2013	16.48% or 10,435
2012	42.66% or 30,852

3. The 2018 de-enrollment rates for the various recertification procedures were:

- a. USAC- 36.84% (Attachment 2, Column (O) for 2018). Use of USAC accounted for 18% of subscribers (11,378/63,808, see Attachment 2, column C/Attachment 1, page 7, column C) and had the highest de-enrollment rate in 2018, as well as in previous years (41.87% in 2017, 31.76% in 2016, 32.68% in 2015, and see Attachment 2, column O).
- b. DHS database verification then direct contact- 11.04% (Attachment 3, Column (O) for 2018). Use of the DHS database combined with direct contact of subscribers produced the lowest de-enrollment rate in 2018, as well as in previous years (9.34% in 2017, 5.27% in 2016, 8.80 % in 2015, see Attachment 3, column O). Despite these results, just five ETCs used this method in 2018 representing approximately only one percent of recertifying subscribers (788/63,808), see Attachment 3, column C /Attachment 1, page 7, column C).
- c. Wireline Direct contact-only- 19.67% (excluding the Prepaid Wireless ETCs) (Attachment 4, Column O for 2018). Use of the direct contact-only method for wire line ETCs represent only about two percent of the recertifying subscribers (981/63,808, see Attachment 4, Column C for 2018/Attachment 1, page 7, column C).
- d. Prepaid Wireless ETCs direct contact- 21.29% (Attachment 5, Column (O) for 2018). Wireless subscribers represented 79% of recertifying subscribers in 2018 (50,661/63,808, see Attachment 5, column C/Attachment 1, page 7, column C).

**V. COMMISSION ALTERNATIVES**

1. Accept the Department's analysis regarding the ETC's 2018 Lifeline recertification surveys. All ETCs must file their 2019 FCC Form 555 Lifeline survey results by January 31, 2020.
2. Accept the Departments analysis regarding the ETC's 2018 Lifeline recertification surveys with modifications.
3. Reject the Departments analysis regarding the ETC's 2017 Lifeline recertification surveys.

**VI. RECOMMENDATION**

The Department recommends Alternative 1.

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2018 ETC Lifeline Re-Certification Results															
Annual Certification			Filed Data												
Annual Certification			Recertification Methods												
Annual Certification			State/Fed Data Base			ETC Direct Contact			Third Party						
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
			C=A-B					H=F-G				L=I-K	M=(G+K)	N=(D+F+H)	O=((M/N)*100)
Ace Telephone Association 361346	135	3	132	0		132	40	92	0	self survey	0	0	40	132	30.30%
Albany Mutual Telephone Association	54	0	54	0		0	0	0	54	USAC	30	24	30	54	55.56%
Alliance ETC- (Hills)	15	1	14	0		14	3	11	0	self survey	0	0	3	14	21.43%
American Broadband and Telecommunications	38	0	38	0		38	6	32	0	self survey	0	0	6	38	15.79%
Arrowhead Communications Corporation- see Arvig Enterprises, Inc.															
<b>Arvig Enterprises, Inc.</b>															
(1) Arrowhead Communications Corporation	11	0	11	0		0	0	0	11	USAC	5	6	5	11	45.45%
(2) Callaway Telephone Company, Inc.	8	0	8	0		0	0	0	8	USAC	5	3	5	8	62.50%
(3) Clements Telephone Co.	3		3	0		0	0	0	3	USAC	0	3	0	3	0.00%
(4) Eagle Valley Telephone Company	29	0	29	0		0	0	0	29	USAC	15	14	15	29	51.72%
(5) East Otter Tail Telephone Company	314	0	314	0		0	0	0	314	USAC	146	168	146	314	46.50%
(6) Felton Telephone Company	3	0	3	0		0	0	0	3	USAC	1	2	1	3	33.33%
(7) Home Telephone Company	10	0	10	0		0	0	0	10	USAC	5	5	5	10	50.00%
(8) Loretel Systems Inc.	115	0	115	0		0	0	0	115	USAC	53	62	53	115	46.09%
(9) Melrose Telephone Company	161	0	161	0		0	0	0	161	USAC	72	89	72	161	44.72%
(10) Midwest Telephone Company	73	0	73	0		0	0	0	73	USAC	33	40	33	73	45.21%
(11) Osakis Telephone Company	22	0	22	0		0	0	0	22	USAC	6	16	6	22	27.27%
(12) The Peoples Telephone Co. of Bigfork	29		29	0		0	0	0	29	USAC	14	15	14	29	48.28%
(13) Redwood County Telephone Company	37	0	37	0		0	0	0	37	USAC	16	21	16	37	43.24%
(14) Tekstar Communications Inc.	323	0	323	0		0	0	0	323	USAC	139	184	139	323	43.03%
(15) TwinValley-Ulen Telephone Company	99	0	99	0		0	0	0	99	USAC	43	56	43	99	43.43%
Arvig Telephone Company- see TDS															
City of Barnesville Municipal Telephone	37	0	37	0		0	0	0	37	USAC	23	14	23	37	62.16%
Benton Coop Tel Co	46	2	44			0	0	0	44	USAC	21	23	21	44	47.73%
Blue Earth Valley Telephone Company- see Rural Communications Holding Corp															
Blue Jay Wireless LLC	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%

	2018 ETC Lifeline Re-Certification Results														
	Annual Certification					Recertification Methods					Third Party				
	Subscribers eligible for recertification			State/Fed	Data Base	ETC Direct Contact			Third Party	Subscribers de-enrolled as a result of a third party recertification attempt				Percent of subscribers due for recertification who were de-enrolled	
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
			C=A-B					H=F-G				L=I-K	M=(G+K)	N=(D+F+I)	O=((M/N)*100)
Boomerang Wireless, LLC d/b/a enTouch Wireless	4418	1771	2647	0		0	0	0	2647	USAC	931	1716	931	2647	35.17%
Bridgewater Telephone Co- see TDS															
Budget PrePay Inc.-see Boomerang (16-702, 17-191)															
C-I Communications- see Consolidated Telephone Company															
Callaway Telephone Company-see Arvig Enterprises, Inc.															
Cannon Valley Telecom, Inc.- see Rural Communications Holding Corp															
<b>CenturyLink</b>															
(1) CenturyLink-Chester	1	0	1	0		0	0	0	1	USAC	0	1	1	1	100.00%
(2) CenturyLink-Embarq	431	0	431	0		0	0	0	431	USAC	125	306	125	431	29.00%
(3) CenturyLink-MN	192	0	192	0		0	0	0	192	USAC	65	127	65	192	33.85%
(4) CenturyLink-NW Wisc	142	0	142	121	Wisconsin Cares	21	17	4	0		0	0	17	142	11.97%
(5) CenturyLink-QC	6731	0	6731	0		11	7	4	6720	USAC	2412	4308	2419	6731	35.94%
Christensen Communications Company	14	0	14	0		14	2	12	0	self survey	0	0	2	14	14.29%
Crosslake Telephone Company- see Tri-Co Technologies LLC															
Citizens Tel of Minnesota (361123)- see Frontier Communications															
Citizens Tel of Minnesota (367123)- see Frontier Communications															
Clara City Telephone Co- see Hanson Communications															
Clements Telephone Company- see Arvig Enterprises, Inc.															
<b>Consolidated Communications Holding Company, Inc.</b>															
(1) Consolidated Communications of Mid-Communications Company	106	4	102	67	Department of Human Resources	35	14	21	0	self survey	0	0	14	102	13.73%
(2) Consolidated Communications of Minnesota Company	298	11	287	199	Department of Human Resources	88	28	60	0	self survey	0	0	28	287	9.76%
<b>Consolidated Tel Co</b>	72	0	72	0		0	0	0	72	USAC	36	36	36	72	50.00%
(1) C-I Communications merged into CTC, 17-756															
Crosslake Telephone Company- see Tri County Technologies LLC															
Dunnell Tel Co, Inc.	2	0	2	0		2	0	2	0	self survey	0	0	0	2	0.00%

	2018 ETC Lifeline Re-Certification Results														
	Annual Certification					Recertification Methods			Third Party	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled	
	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt							Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
		C=A-B					H=F-G				L=I-K	M=(G+K)	N=(D+F+H)	O=((M/N)*100)	
Eagle Valley Telephone Company- see Arvig Enterprises, Inc.															
East Otter Tail Telephone Company- see Arvig Enterprises, Inc.															
Easton Telephone Company- see Rural Communications Holding Corp															
Eckles Telephone Company- see Rural Communications Holding Corp															
Emily Cooperative Tel	22	5	17	0		17	5	12	0	self survey	0	0	5	17	29.41%
<b>Farmers-Federated</b>															
(1) Farmers Mutual Tel (361389)	18	1	17					0	17	USAC	6	11	6	17	35.29%
(2) Farmers Mutual Technologies Inc. (369020)	11	3	8	0		0	0	0	8	USAC	4	4	4	8	0.00%
(3) Federated Telephone Coop (369021)	48	0	48	0		0	0	0	48	USAC	17	31	17	48	35.42%
(4) Federated Telephone Coop (361403)	11	0	11	0		0	0	0	11	USAC	5	6	5	11	45.45%
(5) Federated Telephone Cooperative (361390)	37	0	37	0		0	0	0	37	USAC	10	27	10	37	27.03%
Felton Telephone Company- see Arvig Enterprises, Inc.															
<b>Frontier Communications Corp.</b>															
(1) Citizens Tel of Minnesota (361123)	572	0	572	0		0	0	0	572	USAC	0	572	142	572	24.83%
(2) Citizens Tel of Minnesota (367123)	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%
(3) Frontier Communications of MN (361367)	365	0	365	0		0	0	0	365	USAC	102	263	102	365	27.95%
Garden Valley Tel Co	227	15	212	157	Department of Human Resources	55	21	34	0	self survey	0	0	21	212	9.91%
Gardenville Coop Tel Assn	45	0	45	25	Department of Human Resources	20	7	13	0	self survey	0	0	7	45	15.56%
Global Connection Inc of America	144	25	119	0		119	48	71	0	self survey	0	0	48	119	40.34%
Halstad Telephone Company	19	2	17	0		0	0	0	17	USAC	3	14	3	17	17.65%
<b>Hanson Communications, Inc.</b>			0					0				0	0	0	
(1) Clara City Telephone Co	27	0	27	0		27	2	25	0	self survey	0	0	2	27	7.41%
(2) Sacred Heart Telephone Co	8	0	8	0		8	2	6	0	self survey	0	0	2	8	25.00%
(3) Starbuck Telephone Co	48	0	48	0		48	12	36	0	self survey	0	0	12	48	25.00%
(4) Zumbrota Telepoone Co	29	0	29	0		29	9	20	0	self survey	0	0	9	29	31.03%
Harmony Telephone Company (MSG Tel, Inc. - holding company)	22	4	18	0		0	0	0	18	self survey	10	8	10	18	55.56%

ETC	2018 ETC Lifeline Re-Certification Results																
	Annual Certification					Filed Data			Recertification Methods								
	Subscribers			State/Fed	Data Base	ETC Direct Contact			Third Party	Subscribers			Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled		
	eligible for recertification	de-enrolled prior to recertification attempts	total number of subscribers ETC is responsible for recertifying	access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	M	N	O		
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O			
C=A-B			H=F-G			L=I-K			M=(G+K)			N=(D+F+I)			O=((M/N)*100)		
Home Telephone Company- see Arvig Enterprises, Inc.																	
Hutchinson Telephone Company- see NU Telecom, Inc.																	
I-Wireless LLC	2262	519	1743	0		1743	367	1376	0	self survey	0	0	367	1743	21.06%		
Interstate Telecommunications	24	0	24	0		0	0	0	24	USAC	11	13	11	24	45.83%		
Johnson Telephone Company	72	0	72	0		72	0	72	0	self survey	0	0	0	72	0.00%		
KMP d/b/a Mid-State Tel Co.- see TDS																	
Kasson & Mantorville Tel Co	17	0	17	0		17	1	16	0	self survey	0	0	1	17	5.88%		
Larson Utilities, Inc.																	
(1) Minnesota Valley Telephone Company	8	0	8	0		8	0	8	0	self survey	0	0	0	8	0.00%		
(2) Winthrop Telephone Company	4	0	4	0		4	0	4	0	self survey	0	0	0	4	0.00%		
Lismore Coop Tel Co	1	0	1	0		1	0	1	0	no support claimed	0	0	0	1	0.00%		
Lonsdale Tel	0	0	0	0		0	0	0	0	self survey	0	0	0	0	0.00%		
Loretel Systems, Ins.- see Arvig Enterprises, Inc.			0					0					0	0			
Mabel Coop Tel Co	17	3	14	0		14	2	12	0	self survey	0	0	2	14	14.29%		
Manchester-Hartland Telephone Co.	10	0	10	0		10	1	9	0	self survey	0	0	1	10	10.00%		
Mankato Citizens Telephone Co- see Consolidated Communications, Inc.																	
Melrose Telephone Co. -see Arvig Enterprises, Inc.																	
Mid-Communications, Inc.- see Consolidated Communications, Inc.																	
Mid-State Telephone Co. see TDS																	
Midcontinent Communications	752	32	720	0		0	0	0	720	USAC	265	455	265	720	36.81%		
Midwest Telephone Company- see Arvig Enterprises, Inc.																	
Minnesota Valley Tel- see Larson Utilities, Inc.																	
<b>N-U Telecom, Inc.</b>																	
(1) Hutchinson Telephone Company	50	0	50	0		50	14	36	0	self survey	0	0	14	50	28.00%		
(2) New Ulm Telecom, Inc.	123	3	120	0		120	22	98	0	self survey	0	0	22	120	18.33%		
(3) Nuvera Communications, Inc. fka Scott-Rice Tel Co.	60	0	60	0		60	8	52	0	self survey	0	0	8	60	13.33%		
(4) Sleepy Eye Telephone Company	30	0	30	0		30	3	27	0	self survey	0	0	3	30	10.00%		
(5) Western Telephone Company	30	0	30	0		30	6	24	0	self survey	0	0	6	30	20.00%		
Northern Tel Co (affiliate of Wilderness Valley)	2	0	2	0		2	0	2	0	self survey	0	0	0	2	0.00%		







2018 ETC Lifeline Re-Certification Results															
Annual Certification				Recertification Methods											
				ETC Direct Contact			Third Party								
Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled	
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
		C=A-B					H=F-G				L=I-K	M=(G+K)	N=(D+F+H)	O=((M/N)*100)	
Winthrop Tel- see Larson Utilities, Inc.		0													
Wolverton Telephone Co. 361512-see PolarTel		0													
Woodstock Tel Co	19	2	17	0		17	0	17	0	self survey	0	0	0	17	0.00%
Zumbrota Telephone Co- see Hanson Communications, Inc.			0												
2018	71452	7639	63808	2441		47335	10132	37203	14032		4983	9049	15115	63808	23.69%
				3.83%		74.18%	15.88%	58.30%	21.99%		7.81%	14.2%		63808	
2017	38569	9580	28989	1813		22080	5690	16446	5096		2130	2970	7820	28989	26.98%
				6.25%		76.17%	19.63%	56.73%	17.58%		7.35%	10.2%		28989	
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de-enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by USAC	# of subscribers de-enrolled by USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de-enrolled by non-response or ineligibility	Percent of Subscribers de-enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M=(F+K)	N=(J+L)	O=((N/M)*100)
2016	86724	150	8857	17453	60174	43629	35216	8412	191	8603	16983	1110	60612	9713	16.02%
2015	89070	163	7022	25531	56354	47709	37469	10219	231	10450	9033	1061	56734	11511	20.29%
2014	101425	190	8885	27841	64509	58458	37818	20640	646	21286	7720	2413	66178	23699	35.81%
2013	68081				63302	39002	31018	7983	641	8624	4803	1811	63302	10435	16.48%
2012	86891				72327	70615	30440	30140		30599	1712	253	72327	30852	42.66%

2018 ETC Lifeline Re-Certification Results																Attachment 2
Third Party/USAC Companies																page 1 of 2
Annual Certification			Recertification Methods													
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	State/Fed	Data Base	ETC Direct Contact			Third Party				Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled	
					Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC				
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
			C=A-B										M= (G+K)	N=(D+F+I)	O=((M/N)*100)	
Albany Mutual Telephone Association	54	0	54	0		0	0	0	54	USAC	30	24	30	54	55.56%	
<b>Arvig Enterprises, Inc.</b>																
(1) Arrowhead Communications Corporation	11	0	11	0		0	0	0	11	USAC	5	6	5	11	45.45%	
(2) Callaway Telephone Company, Inc.	8	0	8	0		0	0	0	8	USAC	5	3	5	8	62.50%	
(3) Clements Telephone Co.	3	0	3	0		0	0	0	3	USAC	0	3	0	3	0.00%	
(4) Eagle Valley Telephone Company	29	0	29	0		0	0	0	29	USAC	15	14	15	29	51.72%	
(5) East Otter Tail Telephone Company	314	0	314	0		0	0	0	314	USAC	146	168	146	314	46.50%	
(6) Felton Telephone Company	3	0	3	0		0	0	0	3	USAC	1	2	1	3	33.33%	
(7) Home Telephone Company	10	0	10	0		0	0	0	10	USAC	5	5	5	10	50.00%	
(8) Loretel Systems Inc.	115	0	115	0		0	0	0	115	USAC	53	62	53	115	46.09%	
(9) Melrose Telephone Company	161	0	161	0		0	0	0	161	USAC	72	89	72	161	44.72%	
(10) Midwest Telephone Company	73	0	73	0		0	0	0	73	USAC	33	40	33	73	45.21%	
(11) Osakis Telephone Company	22	0	22	0		0	0	0	22	USAC	6	16	6	22	27.27%	
(12) The Peoples Telephone Co. of Bigfork	29	0	29	0		0	0	0	29	USAC	14	15	14	29	48.28%	
(13) Redwood County Telephone Company	37	0	37	0		0	0	0	37	USAC	16	21	16	37	43.24%	
(14) Tekstar Communications Inc.	323	0	323	0		0	0	0	323	USAC	139	184	139	323	43.03%	
(15) TwinValley-Ulen Telephone Company	99	0	99	0		0	0	0	99	USAC	43	56	43	99	43.43%	
City of Barnesville Municipal Telephone	37	0	37	0		0	0	0	37	USAC	23	14	23	37	62.16%	
Benton Coop Tel Co	46	2	44	0		0	0	0	44	USAC	21	23	21	44	47.73%	
<b>CenturyLink</b>																
(1) CenturyLink-Chester	1	0	1	0		0	0	0	1	USAC	0	1	1	1	100.00%	
(2) CenturyLink-Embarq	431	0	431	0		0	0	0	431	USAC	125	306	125	431	29.00%	
(3) CenturyLink-MN	192	0	192	0		0	0	0	192	USAC	65	127	65	192	33.85%	
(4) CenturyLink-QC	6731	0	6731	0		11	7	4	6720	USAC	2412	4308	2419	6731	35.94%	
<b>Consolidated Tel Co</b>	72	0	72	0		0	0	0	72	USAC	36	36	36	72	50.00%	
<b>Farmers-Federated</b>																
(1) Farmers Mutual Tel (361389)	18	1	17	0		0	0	0	17	USAC	6	11	6	17	35.29%	
(2) Farmers Mutual Technologies Inc. (369020)	11	3	8	0		0	0	0	8	USAC	4	4	4	8	0.00%	
(3) FederatedTelephone Coop (369021)	48	0	48	0		0	0	0	48	USAC	17	31	17	48	35.42%	
(4) Federated Telephone Coop(361403)	11	0	11	0		0	0	0	11	USAC	5	6	5	11	45.45%	
(5) Federated Telephone Cooperative (361390)	37	0	37	0		0	0	0	37	USAC	10	27	10	37	27.03%	
<b>Frontier Communications</b>																
(1) Citizens Tel of Minnesota (361123)	572	0	572	0		0	0	0	572	USAC	0	572	142	572	24.83%	
(3) Frontier Communications of MN (361367)	365	0	365	0		0	0	0	365	USAC	102	263	102	365	27.95%	
Halstad Telephone Company	19	2	17	0		0	0	0	17	USAC	3	14	3	17	17.65%	
Interstate Telecommunications	24	0	24	0		0	0	0	24	USAC	11	13	11	24	45.83%	
Midcontinent Communications	752	32	720	0		0	0	0	720	USAC	265	455	265	720	36.81%	
Park Region Tel Co (affiliates Rothsay and Valley Tel Co)	19	0	19	0		0	0	0	19	Solix	4	15	4	19	21.05%	
(1) Rothsay Telephone Co.	5	0	5	0		0	0	0	5	Solix	1	4	1	5	20.00%	
(2) Valley Telephone Co.	5	0	5	0		0	0	0	5	Solix	3	2	3	5	60.00%	
Runestone Telecom Assn- 361423	8	0	8	0		0	0	0	8	USAC	1	7	1	8	12.50%	
Runestone Telecom Assn- 361475	71	0	71	0		0	0	0	71	USAC	32	39	32	71	45.07%	

2018 ETC Lifeline Re-Certification Results																Attachment 2			
Third Party/USAC Companies																page 2 of 2			
Annual Certification				Recertification Methods															
				State/Fed	Data Base	ETC Direct Contact				Third Party									
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled				
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O				
<b>Rural Communications Holding Corporation</b>																			
(1) Blue Earth Valley Telephone Co	186	0	186	0		0	0	0	186	USAC	112	74	112	186	60.22%				
(2) Cannon Valley Telecom, Inc.	35	0	35	0		0	0	0	35	USAC	16	19	16	35	45.71%				
(3) Easton Telephone Company	23	0	23	0		0	0	0	23	USAC	14	9	14	23	60.87%				
(4) Eckles Telephone company	48	0	48	0		0	0	0	48	USAC	23	25	23	48	47.92%				
(5) Granada Telephone Company	3	0	3	0		0	0	0	3	USAC	2	1	2	3	66.67%				
(6) Pine Island Telephone Company	24	0	24	0		0	0	0	24	USAC	13	11	13	24	54.17%				
Southwest Minnesota Broadband Services	35	0	35	0		0	0	0	35	USAC	7	28	7	35	20.00%				
Spring Grove Comm	59	3	56	0		0	0	0	56	USAC	38	18	38	56	67.86%				
<b>TDS Telecommunications Corporation</b>																			
(1) Arvig Telephone Company	115	1	114	0		0	0	0	114	USAC	40	74	40	114	35.09%				
(2) Bridge Water Telephone Co	31	0	31	0		0	0	0	31	USAC	13	18	13	31	41.94%				
(3) KMP d/b/a Mid-State Tel Co.	1	0	1	0		0	0	0	1	USAC	0	1	0	1	0.00%				
(4) Mid-State Telephone Company	57	0	57	0		0	0	0	57	USAC	18	39	18	57	31.58%				
(5) Winsted Telephone Company	12	1	11	0		0	0	0	11	USAC	3	8	3	11	27.27%				
Wikstrom Telephone Co., Inc.	24	0	24	0		0	0	0	24	USAC	13	11	13	24	54.17%				
Winnebago Coop Telecom Association 316337	4	0	4	0		0	0	0	4	USAC	1	3	1	4	25.00%				
2018	11423	45	11378	0		11	7	4	11367		4042	7325	4192	11378	36.84%				
Total	71195		63808	0.00%		0.10%	0.06%	0.04%	99.90%		35.5%	64.4%							
Percent of total	16.04%		17.83%																
2017	5271	143	5128	0		34	21	13	5094		2126	2968	2147	5128	41.87%				
				0.00%		0.66%	0.41%	0.25%	99.34%		41.5%	57.9%							
2017 ETC Lifeline Re-Certification Results																Attachment 2			
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de-enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by USAC	# of subscribers de-enrolled by USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de-enrolled by non-response or ineligibility	Percent of Subscribers de-enrolled				
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O				
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M=(F+K)	N=(J+L)	O=(N/M)*100				
2016 Totals	3729	0	221	183	3325	0	0	0	0	0	3325	1056	3325	1056	31.76				
2015 Totals	3219	0	347	253	2619	8	8	0	0	0	2619	856	2619	856	32.68				
2014 Results	3729	0	81	0	3648	5	5	0	0	0	3162	1796	3167	1796	56.71				
2013 Results													3162	1796	56.80				

2018 ETC Lifeline Re-Certification Results																Attachment 3
Wireline Data base & Direct Contact Companies																
Annual Certification			Recertification Methods													
ETC	State/Fed Data Base			ETC Direct Contact					Third Party					Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC				
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
			C=A-B										M= (G+K)	N=(D+F+I)	O=((M/N)*100)	
<b>CenturyLink</b>																
CenturyLink-NW Wisc	142	0	142	121	Wisconsin Cares	21	17	4	0	self survey	0	0	17	142	11.97%	
<b>Consolidated Communications Holding Company, Inc.</b>																
(1) Consolidated Communications of Mid-Communications Company	106	4	102	67	Department of Human Resources	35	14	21	0	self survey	0	0	14	102	13.73%	
(2) Consolidated Communications of Minnesota Company	298	11	287	199	Department of Human Resources	88	28	60	0	self survey	0	0	28	287	9.76%	
Garden Valley Tel Co	227	15	212	157	Department of Human Resources	55	21	34	0	self survey	0	0	21	212	9.91%	
Gardonville Coop Tel Assn	45	0	45	25	Department of Human Resources	20	7	13	0	self survey	0	0	7	45	15.56%	
2018 Total	818	30	788	569		219	87	132	0		0	0	87	788	11.04%	
Percent of total	1.15%		1.23%													
2017	668	4	664	529		135	62	73	0		0	0	62	664	9.34%	
<b>ETC</b>	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de-enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by state, eligibility data base	# of subscribers de-enrolled by state, eligibility data base	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de-enrolled by non-response or ineligibility	Percent of Subscribers de-enrolled	
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)	
2016 Totals	12099	150	252	341	11356	2429	1878	551	15	566	8927	32	11356	598	5.27	
2015 Totals	2059	0	55	88	1916	576	511	82	7	89	1368	82	1944	171	8.80	
2014 Totals	3246	150	26	178	3042	1248	805	444	14	458	1794	25	3043	483	15.87	
2013 Results	2771		150		2621								2942	387	13.15	

2018 ETC Lifeline Re-Certification Results															
Wireline Direct Contact Companies															
Attachment 4															
page 1 of 3															
Annual Certification			Recertification Methods			ETC Direct Contact			Third Party						
			State/Fed	Data Base											
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
			C=A-B										M= (G+K)	N=(D+F+I)	O=((M/N)*100)
Ace Telephone Association 361346	135	3	132	0		132	40	92	0	self survey	0	0	40	132	30.30%
Alliance ETC- (Hills)	15	1	14	0		14	3	11	0	self survey	0	0	3	14	21.43%
Christensen Communications Company	14	0	14	0		14	2	12	0	self survey	0	0	2	14	14.29%
Dunnell Tel Co, Inc.	2	0	2	0		2	0	2	0	self survey	0	0	0	2	0.00%
Emily Cooperative Tel	22	5	17	0		17	5	12	0	self survey	0	0	5	17	29.41%
<b>Hanson Communications, Inc.</b>															
(1) Clara City Telephone Co	27	0	27	0		27	2	25	0	self survey	0	0	2	27	7.41%
(2) Sacred Heart Telephone Co	8	0	8	0		8	2	6	0	self survey	0	0	2	8	25.00%
(3) Starbuck Telephone Co	48	0	48	0		48	12	36	0	self survey	0	0	12	48	25.00%
(4) Zumbrota Telepoone Co	29	0	29	0		29	9	20	0	self survey	0	0	9	29	31.03%
Harmony Telephone Company (MSG Tel, Inc.- holding company)	22	4	18	0		0	0	0	18	self survey	10	8	10	18	55.56%
Johnson Telephone Company	72	0	72	0		72	0	72	0	self survey	0	0	0	72	0.00%
Kasson & Mantorville Tel Co	17	0	17	0		17	1	16	0	self survey	0	0	1	17	5.88%
<b>Larson Utilities, Inc.</b>															
(1) Minnesota Valley Telephone Company	8	0	8	0		8	0	8	0	self survey	0	0	0	8	0.00%
(2) Winthrop Telephone Company	4	0	4	0		4	0	4	0	self survey	0	0	0	4	0.00%
Lismore Coop Tel Co	1	0	1	0		1	0	1	0	no support claimed	0	0	0	1	0.00%
Lonsdale Tel	0	0	0	0		0	0	0	0	self survey	0	0	0	0	0.00%
Mabel Coop Tel Co	17	3	14	0		14	2	12	0	self survey	0	0	2	14	14.29%
Manchester-Hartland Telephone Co.	10	0	10	0		10	1	9	0	self survey	0	0	1	10	10.00%
<b>N-U Telecom, Inc.</b>															
(1) Hutchinson Telephone Company	50	0	50	0		50	14	36	0	self survey	0	0	14	50	28.00%
(2) New Ulm Telecom, Inc.	123	3	120	0		120	22	98	0	self survey	0	0	22	120	18.33%
(3) Nuvera Communications, Inc. fka Scott-Rice Tel Co.	60	0	60	0		60	8	52	0	self survey	0	0	8	60	13.33%
(4) Sleepy Eye Telephone Company	30	0	30	0		30	3	27	0	self survey	0	0	3	30	10.00%
(5) Western Telephone Company	30	0	30	0		30	6	24	0	self survey	0	0	6	30	20.00%
Northern Tel Co (affiliate of Wilderness Valley)	2	0	2	0		2	0	2	0	self survey	0	0	0	2	0.00%
<b>PolarTel</b>															
(1) Wolverton Telephone Co. 361512	0	0	0	0		0	0	0	0	self survey	0	0	0	0	0.00%

2018 ETC Lifeline Re-Certification Results															
Wireline Direct Contact Companies															
Attachment 4															
Page 2 of 3															
Annual Certification			Recertification Methods			ETC Direct Contact			Third Party						
			State/Fed	Data Base											
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
			C=A-B										M= (G+K)	N=(D+F+I)	O=((M/N)*100)
Red River Rural Telephone Assoc.	68	0	68	0		68	20	48	0	self survey	0	0	20	68	29.41%
Tri-Co Technologies fka Crosslake Tel. Co.	12		12	0		12	5	7	0	self survey	0	0	5	12	41.67%
Upsala Coop Tel Assn	24	0	24	0		24	0	24	0	self survey	0	0	0	24	0.00%
West Central Tel Assn.	45	0	45	0		45	11	34	0	self survey	0	0	11	45	24.44%
Wikstrom Telephone Co., Inc.			0							self survey			0	0	#DIV/0!
Wilderness Valley Tel Co ( see affiliate Northern Tel Co)	1	0	1	0		1	0	1	0	self survey	0	0	0	1	0.00%
<b>Windstream Communications</b>			0												
(1) Windstream Communications LLC-361414	65	0	60			60	11	49	0	self survey	0	0	11	60	18.33%
(2) Windstream Communications LLC-361482	31	4	27	0		27	4	23	0	self survey	0	0	4	27	14.81%
Woodstock Tel Co	19	2	17	0		17	0	17	0	self survey	0	0	0	17	0.00%
2018	1011	25	981	0	0	963	183	780	18	0	10	8	193	981	19.67%
Total	71195		63808	0.00%		98.17%	18.65%	79.51%	1.83%		1.0%	0.8%			
Percent Total	1.42%		1.54%												
2017	914	41	873	0	0	873	118	678	0	0.0%	4	0.0%	122	873	13.97%
				0		1	13.52%	77.66%	0		0.5%	0.0%			
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de-enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by USAC	# of subscribers de-enrolled by USAC	# of subscribers attempted to recertify directly, or by state, data base, or USAC	# of subscribers de-enrolled by non-response or ineligibility	Percent of Subscribers de-enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)
2016 Totals	2008	0	79	177	1752	1752	1444	307	33	340	0	0	1752	340	19.41
2015 Totals	15075	163	471	681	13760	13760	10155	3567	43	3610	0	0	13760	3610	26.24%
2014 Totals	18091	190	466	831	16604	16576	12064	4512	36	4548	32	21	16608	4569	27.51

2018 ETC Lifeline Re-Certification Results															Attachment 4
Annual Certification					Recertification Methods										Page 3 of 3
					State/Fed	Data Base	ETC Direct Contact			Third Party					
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M= (F+K)	N=(J+L)	O=((N/M)*100)
2013 Results						17427				4965					28.49%
2012 Results						70615				30599					43.33%
							42.7%			43.3%		14.8%			

2018 ETC Lifeline Re-Certification Results																Attachment 5				
Wireless Companies																				
Annual Certification				Recertification Methods				Third Party												
			State/Fed	Data Base	ETC Direct Contact															
ETC	Subscribers eligible for recertification	Subscribers de-enrolled prior to recertification attempts	Total number of subscribers ETC is responsible for recertifying	Subscribers recertified through ETC access to state or federal database	Name of data source	Subscribers contacted by ETC directly to recertify	Subscribers who failed to recertify through ETC direct outreach attempt	Subscribers who recertified through ETC direct outreach attempt	Third Party-Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC	Name of third party administrator used to verify subscriber eligibility	Subscribers de-enrolled as a result of a third party recertification attempt	Subscribers recertified by a state administrator or third party administrator or USAC	Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled					
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O					
			C-A-B										M=(G+K)	N=(D+F+I)	O=(M/N)*100					
American Broadband and Telecommunications	38	0	38	0		38	6	32	0	self survey	0	0	6	38	15.79%					
Blue Jay Wireless LLC dba Standup Wireless	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%					
Boomerang Wireless, LLC d/b/a enTouch Wireless	4418	1771	2647	0		0		0	2647	USAC	931	1716	931	2647	35.17%					
Global Connection Inc of America	144	25	119	0		119	48	71	0	self survey	0	0	48	119	40.34%					
I-Wireless LLC	2262	519	1743	0		1743	367	1376	0	self survey	0	0	367	1743	21.06%					
Q Link Wireless LLC (Quadrant Holdings Group LLC)	33347	3022	30325	0		30325	7638	22687	0	self survey	0	0	7638	30325	25.19%					
Sage Telecom Communications LLC (TSC Acquisition Corporation)	0	0	0	0		0	0	0	0	no support claimed	0	0	0	0	0.00%					
T-Mobile Central LLC	68	5	63	0		63	13	50	0	self survey	0	0	13	63	20.63%					
TAG Mobile LLC	7	0	7	0		7	2	5	0	self survey	0	0	2	7	28.57%					
Telrite Corporation d/b/a Life Wireless	7179	1362	5817	1849	Department of Human Resources	3968	1347	2621	0	self survey	0	0	1347	5817	23.16%					
Tempo Telecom LLC (subsidiary of Birch Equity Partners)	256	36	220	0		220	65	155	0	self survey	0	0	65	220	29.55%					
TerraCom, Inc.	124	6	118	23	Department of Human Resources	95	40	55	0	self survey	0	0	40	118	33.90%					
Virgin Mobile USA, LP dba Assurance Wireless *	10357	793	9564	0		9564	329	9235	0	self survey	0	0	329	9564	3.44%					
2018	58200	7539	50661	1872	0	46142	9855	36287	2647	0	931	1716	10786	50661	21.29%					
Total	71195		63808	3.70%		91.08%	19.45%	71.63%	5.22%		1.8%	3.4%								
Percent of Total	81.75%		79.40%																	
2017	31713	9391	22322	1284	0	21038	5264	15684	0	0.0%	0.0%	0.0%	5264	22322	23.58%					
				5.75%		94.25%	23.58%	70.26%	0		0	0								
ETC	FCC Form 497 (Feb 2015)	Wholesale lines provided to wireline resellers	# initially enrolled in current calendar year	Number of Subscribers de-enrolled prior to recertification	# of subscribers to be recertified	# of subscribers contacted directly	# of responding subscribers	# of non-responding subscribers	# of ineligible responding subscribers	# of subscribers de-enrolled	# of subscribers reviewed by state, eligibility data base	# of subscribers de-enrolled by state, eligibility data base	# of subscribers attempted to recertify directly, or by state, data base	# of subscribers de-enrolled by non-response or ineligibility	Percent of Subscribers de-enrolled					
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O					
					E=(A-B-C-D)			H=(F-G)		J=(H+I)			M=(F+K)	N=(J+L)	O=(N/M)*100					
2016 Totals	69149	0	8341	16945	43863	39570	31948	7622	143	7765	4731	26	44301	7791	17.59					
2015 Totals	68648	0	6149	24503	37996	33360	26792	6568	181	6749	4988	109	38348	6858	17.88					
2014 Totals	75852	24469	8253	26580	41019	40803	25086	15717	601	16318	1731	4	42534	16322	38.37					
2013 Results	40219	0	1535	18442	20242	20269	17351	2918	369	3287	0	0	20269	3287	16.22					



## **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  
Comments**

**Docket No. P999/M-19-20**

**Dated this 7<sup>th</sup> day of May 2019**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-20_PR-19-20
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-20_PR-19-20
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_19-20_PR-19-20

U10036 Ace Telephone Association Cynthia Sweet 207 E CEDAR ST Houston MN 55943-0360	U10403 Alliance Communications Cooperative, Inc Kari Flanagan Manager PO Box 349 612 E 3RD ST Garretson SD 57030	U6916 American Broadband and Telecommunica Jeffrey S Ansted President 1 Seagate Ste 600 Toledo OH 43604
U10073 Arrowhead Communications Corp. David Schornack 150 2nd Street SW Perham MN 56573	U10077 Arvig Telephone Company Jean M Pauk State Governnt Affairs Mngr- TDS Telecom 525 Junction Rd Madison WI 53717	U10131 Barnesville Municipal Telephone Company Guy Swenson Tech Coordinator PO Box 550 101 Front St N Barnesville MN 56514
U10140 Benton Cooperative Telephone Company Cheryl L Scapanski General Manager 2220 125th St NW Rice MN 56367-9701	U10149 Blue Earth Valley Telephone Company dba Jim Beattie Regulatory 123 W 7th St Blue Earth MN 56013-1309	U10156 Bridge Water Telephone Company Jean M Pauk Manager External Relations- TDS Telecom 525 Junction Rd Madison WI 53717
U10213 Callaway Telephone Company David Schornack 150 2nd St SW Perham MN 56573-1409	U10215 Cannon Valley Telecom, Inc. Jim Beattie Regulatory 123 W 7th St Blue Earth MN 56013	U10227 CenturyTel of Chester, Inc. dba CenturyLi Jason Topp 200 S 5th St Ste 200 Minneapolis MN 55402
U10738 CenturyTel of Minnesota, Inc. dba Century Jason Topp 200 S 5th St Ste 2200 Minneapolis MN 55402	U10935 CenturyTel of Northwest Wisconsin, LLC c Jason Topp 200 S 5th St Ste 2200 Minneapolis MN 55402	U10640 Christensen Communications Company Kathy Boutwell regulatory 104 W Main St Madelia MN 56062-1440
U10251 Citizens Telecommunications Company of Scott Bohler 2378 Wilshire Blvd Mound MN 55364-1652	U10231 Clara City Telephone Exchange Company Bruce Hanson Office Mgr 1104 19th Ave SW Ste B Willmar MN 56201	U10233 Clements Telephone Company, Inc. Mark Birkholz 150 2nd St. SW Perham MN 56573
U10643 Consolidated Communications of Minnesc Ann Morrison 221 E Hickory Street PO Box 3248 Mankato MN 56002-3248	U10248 Consolidated Telephone Company Kristi K Westbrook PO Box 972 1102 Madison Street Brainerd MN 56401	U10303 Dunnell Telephone Company, Inc. Charles Mattingly Owner PO Box 728 Judson TX 75660-0728
U10315 Eagle Valley Telephone Company David Schornack 150 2nd St. SW Perham MN 56573	U10320 East Otter Tail Telephone Company Loretta Tastad 150 2nd St SW Perham MN 56573	U10323 Easton Telephone Company dba BEVCOMI Jim Beattie 123 W. 7th St. Blue Earth MN 56013
U10325 Eckles Telephone Company dba BEVCOMM Jim Beattie Regulatory 123 W 7th St Blue Earth MN 56013	U11037 Embarq Minnesota, Inc. dba CenturyLink Jason Topp 200 S 5th St Ste 2200 Minneapolis MN 55402	U10335 Emily Cooperative Telephone Company Josh Netland PO Box 100 Emily MN 56447-0100
U10363 Farmers Mutual Telephone Company Kevin Beyer 301 2nd St S Bellingham MN 56212	U10366 Federated Telephone Cooperative Kevin Beyer Marketing/Customer Service PO Box 156 405 2nd St E Chokio MN 56221	U10367 Felton Telephone Company, Inc. David Schornack 150 2nd St. SW Perham MN 56573

U10223  
Frontier Communications of Minnesota, Inc  
Scott Bohler  
2378 Wilshire Blvd  
Mound MN 55364-1652

U14006  
Global Connection Inc. of America  
Dee DiCicco VP Operations  
5555 Oakbrook Pkwy Ste 620  
Norcross GA 30093

U10445  
Harmony Telephone Company  
Jim Fishbaugher  
35 1st Ave. NE  
PO Box 308  
Harmony MN 55939-0308

U10465  
Hutchinson Telephone Company dba NU-  
Monty S Morrow  
PO Box 697  
27 N Minnesota St  
New Ulm MN 56073

U10511  
Johnson Telephone Company  
Dwayne Johnson Sec/Treas  
205 1st Ave NE  
PO BOX 39  
Remer MN 56672-0039

U10590  
Lonsdale Telephone Company  
Bonnie Simon reg  
PO Box 358  
Lonsdale MN 55046

U10642  
Manchester-Hartland Telephone Company  
Dave Steele  
204 Railroad St  
Manchester MN 56007-5012

U13760  
Midcontinent Communications  
Kristi Putnam  
3901 N Louise Ave  
Sioux Falls SD 57107

U10736  
Northern Telephone Company of Minnesota  
Shane Young President  
13448 County Road 25  
Wawina MN 55736

U10784  
Park Region Mutual Telephone Co. - Coop  
Dave Bickett  
PO Box 277  
100 Main St  
Underwood MN 56586-0277

U10401  
Garden Valley Telephone Company - Coop  
Tim Brinkman CEO/General Manager  
201 Ross Ave.  
PO Box 259  
Erskine MN 56535-0259

U10411  
Granada Telephone Company dba BEVCOI  
Jim Beattie  
123 W 7th St  
Blue Earth MN 56013

U13089  
Heartland Telecommunications Company  
Kent Westphal  
339 1st Ave. NE, P.O. Box 200  
Sioux Center IA 51250

U10295  
Interstate Telecommunications Cooperative  
Tracy Bandemer CPA  
312 4th St. West  
PO Box 920  
Clear Lake SD 57226

U10545  
Kasson & Mantorville Telephone Company  
Beth Tollefson  
18 2nd Avenue NW  
Kasson MN 55944

U10724  
Loretel Systems, Inc.  
David Schornack  
150 2nd St SW  
Perham MN 56573

U10658  
Melrose Telephone Company dba Arvig  
Mark Birkholz Director of Southern Mark  
150 2nd St SW  
Perham MN 56573

U10670  
Midwest Telephone Company  
Mark Birkholz Reg  
150 Second Street SW  
Perham MN 56573

U10716  
Nuvera Communications, Inc.  
Chris Newman Reg  
PO Box 697  
27 N Minnesota St  
New Ulm MN 56073-0697

U10785  
Paul Bunyan Rural Telephone Coop  
Gary Johnson Gen Mgr  
1831 Anne St NW  
Bemidji MN 56601-5660

U10402  
Gardenville Cooperative Telephone Assoc  
Dave Wolf Manager  
800 Central Ave N  
Brandon MN 56315

U10440  
Halstad Telephone Company  
Melanie Nelson  
PO Box 55  
345 2nd Ave W  
Halstad MN 56548

U10459  
Home Telephone Company  
Mark Birkholz  
150 2nd St. SW  
Perham MN 56573

U13543  
Jaguar Communications, Inc.  
Kristine Anderson  
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U10586  
Lismore Cooperative Telephone Company  
Kim Haugen Bookkeeper & Reg Contact  
PO Box 127  
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U10636  
Mabel Cooperative Telephone Company  
Lorren Tingesdal  
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Mabel MN 55954

U10666  
Mid-State Telephone Company  
Jean M Pauk Ext Rel Mgr-MN,WI  
TDS Telecom  
525 Junction Rd  
Madison WI 53717

U10684  
Minnesota Valley Telephone Company  
Danny Busche Office Mgr.  
PO Box 310  
340 2nd Ave E  
Franklin MN 55333

U10755  
Osakis Telephone Company  
Mark Birkholz  
150 2nd St SW  
Perham MN 56573

U10795  
Pine Island Telephone Company dba BEVCOI  
Jim Beattie  
123 W 7th St  
Blue Earth MN 56013

U10796 Polar Communications Mutual Aid Corpor Shari Flanders CFO PO Box 270 Park River ND 58270	U10832 Red River Rural Telephone Association Jeffrey J Olson General Manager 510 Broadway PO Box 136 Abercrombie ND 58001-0136	U6859 Redwood County Telephone Company Mark Birkholz 160 2nd St SW Perham MN 56573
U10851 Rothsay Telephone Company David Bickett PO Box 277 Underwood MN 56586	U10855 Runestone Telephone Association Kent Hedstrom CEO PO Box 336 Hoffman MN 56339-0336	U10914 Sacred Heart Telephone Company Bruce Hanson Regulatory 1104 19th Ave SW Ste B Willmar MN 56201
U10921 Scott-Rice Telephone Company Donna Heaston Mgr, Reg Affairs Integra Telecom 6160 Golden Hills Dr Golden Valley MN 55416-1020	U10933 Sleepy Eye Telephone Company dba Nuvei Kathy Lund PO Box 697 27 N Minnesota St New Ulm MN 56073	U6845 Southwest Minnesota Broadband Services Travis Thies General Manager PO Box 1006 Lakefield MN 56150
U10942 Spring Grove Communications Bruce Hegge 166 W Main St Spring Grove MN 55974	U10952 Starbuck Telephone Company Bruce Hanson Regulatory 1104 19th Ave SW Willmar MN 56201-5006	U13198 Tekstar Communications, Inc. David Schornack General Manager dba Arvig Communication Systems 150 2nd St SW Perham MN 56573
U13867 Telrite Corporation Karen Russell Compliance Administrator 11100 Alcovy Road Covington GA 30014	U10789 The Peoples Telephone Company of Bigfo Mark Birkholz 150 2nd St. SW Perham MN 56573	U6970 Tri-Co Technologies, LLC James L Beattie 123 West 7th St Blue Earth MN 56013
U11022 Twin Valley-Ulen Telephone Co. Mark Birkholz 150 2nd St SW Perham MN 56573	U11040 Upsala Cooperative Telephone Associatio Melissa Tschida PO Box 277 Upsala MN 56384	U11056 Valley Telephone Company Dave Bickett PO Box 277 100 Main St Underwood MN 56586
U11089 West Central Telephone Association Chad Bullock 308 Frontage Road PO Box 304 Sebeka MN 56477	U11097 Western Telephone Company dba Nuvera Kathy Lund 27 N Minnesota St # 697 C/O NEW ULM TELECOM INC. New Ulm MN 56073	U11101 Wikstrom Telephone Company Curtiss Wikstrom PO Box 217 212 S Main Street Karlstad MN 56732-0217
U12806 Wilderness Valley Telephone Company Inc Shane Young President 13448 County Road 25 Wawina MN 55736	U10579 Windstream Lakedale, Inc. Stephen Meradith 1440 M St Lincoln NE 68508	U11106 Winnebago Coop. Telecom Assoc. Mark Thoma General Manager 704 E Main St Lake Mills IA 50450
U11108 Winsted Telephone Company Jean M Pauk External Relations Manager, 525 Junction Rd C/O TDS TELECOM Madison WI 53717	U11109 Winthrop Telephone Company Danny Busche Office Mgr. PO Box 310 318 2nd Ave E Franklin MN 55333-0310	U11111 Wolverton Telephone Company Karl Blake Gen Mgr PO Box 270 Park River ND 58270-0270
U11112 Woodstock Telephone Company Kenneth Knuth President 337 Aetna St Ruthton MN 56170	U11125 Zumbrota Telephone Company Bruce Hanson Regulatory 1104 19th Ave SW Ste B Willmar MN 56201	