

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

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Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of a Notice to Rural Digital
Opportunity Fund (RDOF) Grant Winners

DOCKET NOS. P-999/CI-21-86 et al.

**COMMENTS OF THE OFFICE
OF THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits to the Minnesota Public Utilities Commission (“Commission”) proposed obligations for companies that seek eligible telecommunications carrier (“ETC”) designations in Minnesota to obtain federal Universal Service Rural Digital Opportunity Fund Phase I (“RDOF” or “RDOF Phase I”) support.¹ With the proper protections, RDOF Phase I support has the potential to significantly decrease the broadband gap for rural Minnesotans. To help bridge Minnesota’s digital divide, the OAG proposes RDOF Phase I ETC obligations that advance federal Universal Service goals and protect rural Minnesotans. Assuming the Commission adopts the OAG’s proposed obligations, the OAG recommends ETC designation for most of the companies that seek it from the Commission.²

To provide context for the OAG’s proposed ETC obligations, the Background section of these Comments reviews the Commission’s role in the RDOF process, the purpose of the RDOF generally, and the RDOF auction structure. It also provides a summary of current federal and state ETC regulation. The Jurisdiction section examines the Commission’s ETC authority and concludes that the Commission may impose RDOF Phase I ETC obligations that are consistent

¹ The Commission established Docket No. P-999/CI-21-86 as the overarching docket for companies seeking RDOF Phase I ETC designations. To streamline the review process, the OAG makes broad ETC recommendations in the overarching docket, instead of tailored recommendations in each individual ETC docket. To ensure each company receives the proper notice, however, the OAG will file a copy of its Comments in each company-specific docket. A list of the companies seeking ETC status and their individual docket numbers is provided as Attachment A to this filing.

² The OAG does not recommend ETC designation for Consolidated Communications, Inc., Fond du Lac Communications, Inc., and Windstream Services, LLC. To the OAG’s knowledge, these companies did not file an ETC petition with the Commission. There is no need for the OAG to make an ETC recommendation for Aspire Networks 2, LLC (“Aspire”). This company withdrew its petition for ETC designation on March 1, 2021. *See generally In the Matter of Petition of Aspire Networks 2, LLC for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Support*, Docket No. P-7050/M-21-32, Letter (Mar. 1, 2021). Under delegated authority, the Commission’s Executive Secretary approved the withdrawal on March 17, 2021. Docket No. P-7050/M-21-32, NOTICE AND ORDER APPROVING PETITION TO WITHDRAW FILING at 1 (Mar. 17, 2021).

with federal Universal Service goals. Finally, the Analysis section identifies existing FCC and state ETC obligations and proposes additional obligations for Minnesota RDOF Phase I ETCs to ensure that rural Minnesotans benefit from RDOF Phase I support.

BACKGROUND

This section of the OAG’s Comments explains the Commission’s role in the RDOF process, the purpose of the RDOF generally, and the structure of the RDOF auction. It also provides a summary of the current federal and state regulation of ETCs. This background will help the Commission understand the federal Universal Service goals the RDOF aims to achieve and how the RDOF auction was designed to facilitate those goals. It will also orient the Commission to the current stage of the RDOF process and how ETC designation fits into the overall RDOF Phase I framework.

I. THE COMMISSION’S ROLE IN THE RDOF PHASE I ETC PROCESS

As discussed in greater detail below, with limited exceptions,³ state commissions are responsible for the designation of ETCs.⁴ On February 2, 2021, the Commission issued a Notice of Filing Requirement and Comment Deadlines for RDOF Grant Winners (“Notice”).⁵ The Notice required companies that seek a Minnesota ETC designation, or an update of their ETC authority, to submit petitions to the Commission by February 19, 2021.⁶ The Notice also requests comments on whether the Commission should approve the ETC designation and update requests, and whether it should take any other actions in this matter.⁷ The Commission must make its ETC designation and update decisions no later than June 7, 2021.⁸

II. AN OVERVIEW OF THE RDOF AND THE RDOF AUCTION PROCESS

A. THE FCC LAUNCHES THE RDOF TO REDUCE THE DIGITAL DIVIDE FOR RURAL AMERICANS.

The RDOF is the Federal Communications Commission’s (“FCC”) most recent effort to bridge the digital divide in rural America. Like the Connect America Fund before it, the RDOF will expand federal Universal Service to support the deployment of affordable broadband to all Americans. As the FCC observed in the *RDOF Order*, “[w]ithout access to broadband, rural

³ See 47 U.S.C. § 214(e)(6) (governing the designation of ETCs that are not subject to state jurisdiction).

⁴ *Id.* § 214(e)(2).

⁵ *In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners*, Docket No. P-999/CI-21-86, Notice of Filing Requirement and Comment Deadlines for RDOF Grant Winners (Feb. 2, 2021) (“Notice”).

⁶ *Id.* at 1. The Notice informed companies that failure to timely file their ETC petitions could result in the Commission being unable to determine ETC status by the FCC-mandated deadline. *Id.*

⁷ *Id.*

⁸ See Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021, AU Docket Nos. 20-34 et al., Public Notice, DA 20-1422, paras. 17, 36 (Dec. 7, 2020) (directing RDOF Phase I applicants to obtain their ETC designations and submit documentation prior to 6 p.m. ET on Monday, June 7, 2021) (“Winning Bidder Announcement”).

communities cannot connect to the digital economy and the opportunities for better education, employment, healthcare, and civic and social engagement it provides.”⁹

To decrease the broadband gap, the FCC established an RDOF budget of up to \$20.4 billion to bring high-speed fixed broadband service to unserved and underserved rural homes and small businesses.¹⁰ RDOF funding will be disbursed in two phases. RDOF Phase I will fund homes and businesses in census blocks that the FCC determines are entirely unserved by fixed voice and broadband at speeds of 25/3 Mbps.¹¹ RDOF Phase II will fund homes and businesses in census blocks that are partially served and locations that are not funded in Phase I.¹² RDOF Phase I funding will be disbursed over a ten-year period.¹³ RDOF Phase I is the phase that is before the Commission now.

B. THE FCC CONDUCTS A MULTI-STEP AUCTION PROCESS TO AWARD RDOF PHASE I SUPPORT.

To award RDOF Phase I support, the FCC conducted a multi-step reverse auction process that included the submission of a short-form application, a competitive bidding auction, and the submission of a long-form application.¹⁴ Visually, the process looks like this:¹⁵



The short-form application, auction bidding and announcement, and long-form application components are discussed in more detail below.

1. The RDOF Phase I Short-Form Application

To bid in the RDOF Phase I auction, interested companies were required to establish baseline financial and technical capabilities using a short-form application.¹⁶ Specifically, an interested company had to: (1) demonstrate that it had at least two years of experience providing a voice, broadband, and/or electric distribution or transmission service; (2) submit detailed company ownership and financial information; and (3) provide high-level technical information to demonstrate that the company possesses the technical qualifications necessary to meet the applicable performance tier and latency requirements.¹⁷ Interested companies also had to certify that, if awarded RDOF Phase I support, they have the capability to build and operate facilities “in

⁹ *In the Matter of Rural Digital Opportunity Fund, Connect America Fund*, WC Docket Nos. 19-126 and 10-90, Report and Order, FCC 20-5, para. 1 (2020) (“*RDOF Order*”).

¹⁰ *Id.*, paras. 2, 5.

¹¹ *Id.*, paras. 5, 9.

¹² *Id.*

¹³ *Id.*, para. 7; *see also* 47 C.F.R. § 54.802(b).

¹⁴ *RDOF Order*, paras. 67–113.

¹⁵ FCC Website, Auction 904: Rural Digital Opportunity Fund – Timeline & Deadlines, <https://www.fcc.gov/auction/904/factsheet> (last visited Mar. 18, 2021).

¹⁶ *RDOF Order*, paras. 69–85.

¹⁷ *Id.*, paras. 70–75.

accordance with the [RDOF] obligations and the [FCC’s] rules generally.”¹⁸ ETC designations were not required at the short-form application stage.¹⁹

2. RDOF Phase I Auction Bidding

The RDOF Phase I auction was conducted as a single nationwide, multi-round reverse auction with a minimum broadband performance tier of 25/3 Mbps.²⁰ The auction was structured to prioritize bids that offered the “highest speeds, most usage, and lowest latency for each area,” while keeping within a \$16 billion RDOF Phase I budget.²¹ The auction was technology-neutral, permitting bids in four performance tiers and two levels of latency, as shown below.²² Each tier was weighted, with a weight of 50 for the minimum performance tier; 35 for the Baseline performance tier; 20 for the Above Baseline performance tier; and 0 for the Gigabit performance tier.²³ The two levels of latency were also weighted, with high-latency bids receiving a weight of 40 and low-latency bids receiving a weight of 0.²⁴ The weighting system was structured to “favor higher-than Baseline speeds and low-latency services.”²⁵

Performance Tiers, Latency, and Weights²⁶

Minimum	≥ 25/3 Mbps	≥ 250 GB or U.S. average, whichever is higher	50
Baseline	≥ 50/5 Mbps	≥ 250 GB or U.S. average, whichever is higher	35
Above Baseline	≥ 100/20 Mbps	≥ 2 TB	20
Gigabit	≥ 1 Gbps/500 Mbps	≥ 2 TB	0

Low Latency	≤ 100 ms	0
High Latency	≤ 750 ms & MOS ≥ 4	40

¹⁸ *Id.*, para. 84.

¹⁹ *See id.*, para. 81 (“We are not persuaded that we should require an applicant to secure its ETC designation prior to the auction.”).

²⁰ *Id.*, paras. 18, 31.

²¹ *Id.*, paras. 8, 21.

²² *Id.*, para. 31.

²³ *Id.*, para. 38.

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.*, para. 39.

3. The RDOF Phase I Long-Form Application

Auction winners submitted RDOF Phase I long-form applications to the FCC.²⁷ The long-form applications contain additional bidder qualification, financial, and network information to demonstrate that the auction winners are qualified to receive RDOF Phase I support.²⁸ The long-form applications also require auction winners to certify that they “will meet the relevant public interest obligations for each performance tier and latency combination” for which they were deemed a winning bidder.²⁹ This includes an obligation to offer broadband service at rates that are equal to or lower than the FCC’s reasonable comparability benchmarks for fixed services offered in urban areas.³⁰ The FCC will utilize the long-form applications to finalize its RDOF Phase I support decisions.³¹ Once the FCC approves a winning bidder’s long-form application, it will release a public notice informing the bidder that it is authorized to receive RDOF Phase I support.³²

4. RDOF Phase I Support Overview and ETC Requirement

At the start of the long-form application process, there were 22 winning bidders seeking \$408,150,745.60 in RDOF Phase I funding to deploy high-speed broadband to 142,841 Minnesota locations.³³ A summary of the winning bidders, their requested funding amounts, and their total number of locations is provided in Attachment B of this filing.

By June 7, 2021, a winning bidder must certify to the FCC that it is an ETC in each of the geographic areas for which it seeks RDOF Phase I support and must provide documentation supporting its ETC status.³⁴ A winning bidder may seek a waiver of the June 7, 2021 ETC deadline from the FCC if it filed an ETC petition with the Commission within 30 days of the FCC public notice announcing it as a winning bidder.³⁵

III. FEDERAL AND STATE REGULATION OF ETCs

To understand the OAG’s proposed RDOF Phase I ETC obligations, it is helpful to understand federal and state regulation of ETCs generally. An ETC must meet certain requirements when it: (1) receives its ETC designation; (2) requests an annual recertification of its

²⁷ *Id.*, para. 86. The RDOF Phase I long-form deadline was January 29, 2021. *See* Winning Bidder Announcement, para. 16.

²⁸ *Id.*, paras. 86–91.

²⁹ *Id.*, para. 89.

³⁰ *Id.*

³¹ *Id.*, para. 86 (“Winning bidders will then be required to submit extensive information detailing their respective qualifications in their long-form applications, allowing for a further in-depth review of their qualifications prior to authorization of support.”).

³² *Id.*; *see also* 47 C.F.R. § 54.804(b)(6)(vi).

³³ *See* Winning Bidder Announcement, Attach. A, <https://docs.fcc.gov/public/attachments/DA-20-1422A2.pdf>, and Attach. B, <https://www.fcc.gov/document/auction-904-winning-bidders/attachment-b> (last visited Mar. 18, 2021).

³⁴ *RDOF Order*, para. 92; Winning Bidder Announcement, paras. 17, 36. *See also* 47 C.F.R. § 54.804(b)(5) (“No later than 180 days after the public notice identifying it as a winning bidder, the long-form applicant shall certify that it is an eligible telecommunications carrier in any area for which it seeks support and submit the relevant documentation supporting that certification.”).

³⁵ 47 C.F.R. § 1.3 (permitting waiver for good cause shown); *RDOF Order*, para. 81.

ETC status; (3) wishes to expand or alter its ETC service area; and (4) wishes to relinquish its ETC status. Except for relinquishment,³⁶ an overview of the federal and state regulations for each of these stages is provided below.

A. ETC DESIGNATION

The federal Communications Act of 1934, as amended (the “Act”), requires a telecommunications provider to obtain an ETC designation prior to receiving federal Universal Service support.³⁷ In 2011, the FCC expanded federal Universal Service support to include broadband networks capable of providing both voice and advanced services.³⁸ With limited exceptions,³⁹ state commissions are responsible for the designation of ETCs.⁴⁰

B. ETC RECERTIFICATION

Each year, a High Cost Program ETC—including an RDOF ETC—must file the information and certifications required by the federal Universal Service rules with the Universal Service Administrative Company (“USAC”).⁴¹ In furtherance of this requirement, the FCC has created the Form 481, a detailed and comprehensive form that all ETCs must file by July 1 each year.⁴² In 2017, the FCC eliminated the requirement that Connect America Fund (“CAF”) ETCs file a copy of their FCC Forms 481 with the state.⁴³ In 2019, however, the Commission issued an

³⁶ States play a critical role in the relinquishment of ETC status. *See* 47 U.S.C. § 214(e)(4) (providing a framework for state evaluation of ETC relinquishment requests). Because relinquishment is not relevant here, however, the OAG does not discuss it further.

³⁷ 47 U.S.C. § 214(e)(1).

³⁸ *In the Matter of Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, paras. 1, 15–16, 45 (2011) (“*2011 Transformation Order*”) (adopting support for broadband-capable networks and setting as performance goals: (1) the preservation and advancement of universal availability of voice service; (2) universal availability of modern networks capable of providing voice and broadband; (3) universal availability of modern networks capable of providing advanced mobile voice and broadband; (4) rates for broadband and voice services that are reasonably comparable in all regions of the nation; and (5) the minimization of the universal service contribution burden on consumers and businesses).

³⁹ *See* 47 U.S.C. § 214(e)(6) (governing ETC designation for common carriers not subject to state jurisdiction).

⁴⁰ *See id.* § 214(e)(2) (authorizing states to grant ETC designations). *See also* Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, AU Docket Nos. 20-34 et al., Notice and Filing Requirements and Other Procedures for Auction 904, FCC 20-77, para. 135 (2020) (specifying that only ETCs designated pursuant to section 214(e) of the Act are eligible for federal Universal Service support) (“RDOF Auction Notice”).

⁴¹ 47 C.F.R. §§ 54.313–14, .316. *See also* RDOF Order, para. 53 (aligning the service milestones and related reporting deadlines with those of other high-cost programs), and paras. 56–57 (adopting “essentially the same reporting requirements for the [RDOF] that the [FCC] adopted for the CAF Phase II auction”).

⁴² *See* RDOF Order, para. 57 (citing 47 C.F.R. § 54.314 and requiring RDOF support recipients to include the same information in their annual FCC Forms 481 as CAF Phase II support recipients). *See also* 47 C.F.R. § 54.313 (containing annual reporting requirements for High Cost Program ETCs); Instructions to FCC Form 481 at 1, <https://www.usac.org/wp-content/uploads/high-cost/documents/Forms/FCC-Form-481-Instructions.pdf> (last visited Mar. 18, 2021).

⁴³ *In the Matter of Connect America Fund ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Report and Order, FCC 17-87, para. 15 (2017).

order reinstating the requirement that Minnesota CAF ETCs electronically file their FCC Forms 481 with the state.⁴⁴

C. EXPANSION OR ALTERATION OF AN ETC'S SERVICE AREA

State commissions determine ETC service areas.⁴⁵ If an ETC wishes to expand or alter its service area, it must seek a new ETC designation from the applicable state commission.⁴⁶

For RDOF Phase I, the FCC has decided that an ETC's service area does not need to conform exactly to the service area of the rural telephone company serving the same area.⁴⁷ Thus, an RDOF Phase I ETC could replace an incumbent rural telephone company in portions of the incumbent's service area.⁴⁸ This change (the "Service Area Change") has important repercussions for price cap carriers.⁴⁹

If an RDOF Phase I ETC receives support in the same area(s) as an incumbent price cap carrier ETC with pre-existing federal Universal Service voice telephony obligations, the incumbent is relieved of its voice obligations in that area on the first day of the month after the new ETC is authorized to receive RDOF Phase I support.⁵⁰ If an existing ETC with existing federal Universal Service voice telephony obligations is awarded RDOF Phase I support in its existing service area(s), however, there is no change to the existing ETC's voice obligations for its existing service area(s).⁵¹

While the Service Area Change process may relieve price cap carrier ETCs of their voice obligations in certain areas, it does not redefine their service area(s) or revoke their ETC designations.⁵² In addition, incumbent price cap carrier ETCs must continue to offer voice telephony service to qualifying low-income households, even in areas where a new ETC receives

⁴⁴ *In the Matter of Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of the Federal Universal Service Support Required Pursuant to C.F.R. 54.313*, Docket No. P-999/PR-19-8, ORDER CERTIFYING ELIGIBLE TELECOMMUNICATIONS CARRIERS' USE OF FEDERAL HIGH-COST SUBSIDY at 3–4 (Oct. 17, 2019) ("2019 ETC Order").

⁴⁵ See 47 U.S.C. § 214(e)(2) ("A State commission shall upon its own motion or upon request designate a common carrier . . . as an eligible telecommunications carrier *for a service area designated by the State commission.*") (emphasis added).

⁴⁶ See *id.* § 214(e)(1) (linking an ETC's federal Universal Service support to the service area(s) for which it has an ETC designation). See also Instructions to the Application for Rural Digital Opportunity Fund Phase I Support – Auction 904, FCC Form 683 at 19–20, <https://docs.fcc.gov/public/attachments/DA-20-1422A4.pdf> (Dec. 7, 2020) (requiring an RDOF applicant to obtain an ETC designation that covers all relevant areas in a state) (last visited Mar. 18, 2021) ("FCC Form 683 Instructions").

⁴⁷ *RDOF Order*, para. 93.

⁴⁸ *Id.*

⁴⁹ In 2011, the FCC adopted a new federal Universal Service funding approach in areas served by incumbent local exchange carriers. These areas are known as price cap areas. Thus, in the RDOF context, a "price cap carrier" refers to an incumbent local exchange carrier that serves a federal Universal Service price cap area.

⁵⁰ *Id.*, paras. 135, 139. Correspondingly, the RDOF Phase I ETC should be prepared to provide voice telephony service throughout its service area(s) on the first day of the month after it is authorized to receive RDOF Phase I support. *Id.*, para. 139.

⁵¹ *Id.*, para. 94.

⁵² *Id.*, para. 136.

RDOF Phase I support.⁵³ Similarly, incumbent ETCs in areas with a new RDOF Phase I ETC must ensure that their voice telephony rates remain just and reasonable in their service areas and that they comply with the nondiscrimination obligations of sections 201 and 202 of the Act.⁵⁴

The Service Area Change does not preempt state-level regulations.⁵⁵ Price cap carriers must comply with state carrier of last resort obligations, even in service areas with a new RDOF Phase I ETC.⁵⁶ They must also comply with state regulations governing just and reasonable local rates, regardless of the presence of a new RDOF Phase I ETC.⁵⁷ Finally, in any service area that is not part of the Service Area Change, price cap carriers remain subject to their pre-existing ETC obligations unless or until they relinquish their ETC designations.⁵⁸

JURISDICTION

Having discussed the RDOF process and examined federal and state ETC regulation, this section of the OAG's Comments discusses the Commission's authority to impose obligations on companies seeking ETC designation in Minnesota.

IV. THE DESIGNATION AND OVERSIGHT OF FEDERAL UNIVERSAL SERVICE ETCs IS ACCOMPLISHED BY THE FEDERAL-STATE PARTNERSHIP.

Practically speaking, it would be impossible for the FCC to oversee the designation and federal Universal Service compliance of every ETC in every state. Accordingly, Congress has delegated ETC designation to the states, and the FCC has empowered states to monitor ETC compliance. An ETC-designating state may enact protections essential to advancing federal Universal Service goals and safeguarding consumer interests, as long as those protections do not conflict with the FCC's federal Universal Service rules. This is the federal-state ETC partnership.

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ *Id.*

⁵⁸ *Id.*, para. 137 (“[P]rice cap carriers must continue to maintain existing voice service until they receive discontinuance authority under section 214(a) of the Act and section 63.71 of the [FCC’s] rules.”).

A. THE FEDERAL–STATE PARTNERSHIP EMPOWERS THE COMMISSION TO ADOPT ETC OBLIGATIONS NECESSARY TO PRESERVE AND ADVANCE THE GOALS OF FEDERAL UNIVERSAL SERVICE.

States play a critical role in the designation, recertification, and regulation of ETCs.⁵⁹ The FCC not only relies on,⁶⁰ but defers to,⁶¹ state commission expertise in the matter of ETC regulation. As long as a state’s ETC obligations advance federal Universal Service goals and do not conflict with the FCC’s ETC requirements, they constitute permissible regulation.⁶²

The FCC has explicitly recognized the state’s important role in advancing federal Universal Service goals through state adoption of ETC requirements that best reflect the circumstances at the local level:

We decline to mandate that state commissions adopt our requirements for ETC designations. Section 214(e)(2) of the Act gives states the primary responsibility to designate ETCs and prescribes that all state designation decisions must be consistent with the public interest, convenience, and necessity. We believe that section 214(e)(2) demonstrates Congress’s intent that state commissions evaluate local factual situations in ETC cases and exercise discretion in reaching their conclusions regarding the public interest, convenience and necessity, as long as such determinations are consistent with federal or other state law. States that exercise jurisdiction over ETCs should apply these requirements in a manner that is consistent with section 214(e)(2) of the Act. Furthermore, state commissions, as the entities most familiar with the service area for which ETC designation is sought, are particularly well-equipped to determine their own ETC eligibility requirements. . . . Consistent with our adoption of permissive federal guidelines for ETC designation, state commissions will continue to maintain the flexibility to impose

⁵⁹ See generally *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (2005) (discussing in detail the state’s role in ETC designation and regulation) (“*2005 ETC Order*”); 47 C.F.R. § 54.314(a) (requiring states to file an annual ETC certification with USAC).

⁶⁰ See RDOF Auction Notice, para. 137 (“A high-cost ETC may also be subject to state-specific requirements imposed by the state that designates it as an ETC.”); *2005 ETC Order*, para. 25 (explaining that “[b]ecause most emergency situations are local in nature,” states may identify their own geographically-specific ETC requirements that are relevant for consideration).

⁶¹ See *RDOF Order*, n.26 (explaining that a state’s refusal to certify a company as an ETC made the company ineligible for High Cost Program support); *2011 Transformation Order*, paras. 15, 75, 82 (declining to preempt state carrier of last resort and voice requirements); *2005 ETC Order*, paras. 21 (deferring to states to determine what constitutes a “reasonable request” under state law), 30 (“As with the other requirements adopted in this Report and Order, state commissions that exercise jurisdiction over ETC designations may either follow the Commission’s framework or impose other requirements consistent with federal law to ensure that supported services are offered in a manner that protects consumers.”), 43 (acknowledging that the FCC and state public-interest analyses may diverge or reach different outcomes based on the area served).

⁶² See 47 U.S.C. § 254(f) (“A State may adopt regulations not inconsistent with the Commission’s rules to preserve and advance universal service.”).

additional eligibility requirements in state ETC proceedings, if they so choose.⁶³

States also play an important role in combating waste, fraud, and abuse in the federal Universal Service Programs. The FCC knows that “[t]he billions of dollars that the Universal Service Fund disburses each year to support vital communications services comes from American consumers and businesses, and recipients must be held accountable for how they spend that money.”⁶⁴ The FCC’s ETC reporting and certification requirements reflect a “floor rather than a ceiling” for states and “state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the [federal Universal Service] statute and [the] implementing regulations”⁶⁵

States have the authority to deny, revoke, or rescind an ETC designation.⁶⁶ “[I]f a state commission believes that high-cost support is being used by an ETC in a manner that is inconsistent with section 254 of the Act, the state commission may decline to file an annual certification or may withdraw an ETC’s designation, which would ensure that [federal Universal Service] funds are no longer distributed to the ETC.”⁶⁷ Although a state has the power to revoke a company’s ETC status, such a remedy should not be invoked except in the most egregious circumstances and state commissions should first explore other alternatives to remedy concerns about an ETC’s performance.⁶⁸

B. THE COMMISSION’S AUTHORITY UNDER THE FEDERAL–STATE PARTNERSHIP EXTENDS TO RDOF PHASE I ETCs.

Both the FCC and RDOF applicants recognize that the Commission’s authority extends to RDOF Phase I ETCs.

The FCC explicitly adopted an ETC requirement for RDOF Phase I applicants.⁶⁹ It also renewed its commitment to the federal–state partnership.⁷⁰ Notably, the FCC upheld the “statutory role that Congress created for state commissions,” despite its awareness that “some interested parties may prefer not to become ETCs with all of the associated obligations.”⁷¹

⁶³ *2005 ETC Order*, para. 61.

⁶⁴ *2011 Transformation Order*, para. 568.

⁶⁵ *Id.*, paras. 31, 573–74 (explaining that the FCC’s certification and reporting framework does not “disturb the existing role of states in designating ETCs and in monitoring that ETCs within their jurisdiction are using universal service support for its intended purpose”).

⁶⁶ *Id.*, para. 1114 (seeking input on circumstances that have caused states to revoke ETC designations) & n.999 (citing the FCC’s *2005 ETC Order* and affirming that “state commissions possess the authority to rescind ETC designations for failure of an ETC to comply with the requirements of section 214(e) of the Act or *any other conditions imposed by the state*”) (emphasis added).

⁶⁷ *2005 ETC Order*, para. 62. *See also 2011 Transformation Order*, para. 612 (“[I]f a state commission determines . . . that an ETC did not meet its speed or build-out requirements for the prior year, a state commission should refuse to certify that support is being used for the intended purposes.”).

⁶⁸ *2011 Transformation Order*, para. 618.

⁶⁹ *RDOF Order*, para. 92.

⁷⁰ *See RDOF Auction Notice*, para. 135 & n.305 (acknowledging that states have the primary responsibility for ETC designation and directing applicants to paragraph 61 of the *2005 ETC Order*).

⁷¹ *RDOF Order*, para. 92.

At least two companies in Minnesota have expressly acknowledged the state’s RDOF Phase I ETC authority. In the federal RDOF proceeding, Frontier Communications argued that “the ETC designation process is the states’ opportunity to vet auction bidders and their service proposals.”⁷² And, Windstream Services, Inc. argued that the ETC requirement “ensure[s] that states . . . have authority to monitor a provider’s use of high-cost support and enforce the obligation to provide supported service.”⁷³

C. THE COMMISSION’S AUTHORITY UNDER THE FEDERAL–STATE PARTNERSHIP EXTENDS TO INTERCONNECTED VOIP ETCs.

Interconnected VoIP providers are subject to the Commission’s ETC authority, even if some applicants argue that the Commission may not impose conditions on them. As technology has evolved, so has the federal–state ETC partnership:

We recognize that [the] USF [is] . . . [a] hybrid state-federal system[], and it is critical to our reforms’ success that states remain key partners even as these programs evolve and traditional roles shift. Over the years, we have engaged in ongoing dialogue with state commissions on a host of issues, including universal service. We recognize the statutory role that Congress created for state commissions with respect to eligible telecommunications carrier designations, and we do not disturb that framework. We know that states share our interest in extending voice and broadband service, both fixed and mobile, where it is lacking to better meet the needs of their consumers. . . . We will continue to rely upon states to help us determine whether universal service support is being used for its intended purposes, including by monitoring compliance with the new public interest obligations described in this Order. We also recognize that federal and state regulators must reconsider how legacy regulatory obligations should evolve as service providers accelerate their transition from the Public Switched Telephone Network (PSTN) to an all IP world.⁷⁴

While the states’ regulatory powers over interconnected VoIP providers have recently been restricted,⁷⁵ these restrictions do not apply to the role that states were explicitly delegated in designating and monitoring ETCs. The *Charter Order* narrowly held that fixed interconnected VoIP service is an information service at the *state* level and that *state* regulation of the service is preempted.⁷⁶ That holding is distinguishable from this proceeding, which involves the explicit delegation of federal regulatory authority to a state enforcer.

⁷² *Id.*, n.228 (citing and quoting Frontier Comments at 12–13).

⁷³ *Id.*, n.263 (citing and quoting Windstream Reply at 18).

⁷⁴ *2011 Transformation Order*, para. 15.

⁷⁵ See generally *Charter Advanced Servs. v. Lange*, 903 F.3d 715 (8th Cir. 2018) (“*Charter Order*”).

⁷⁶ *Id.* at 717 (explaining that the Minnesota Department of Commerce filed a complaint alleging the violation of various state laws when Charter sought to move its interconnected VoIP customers to separate company to avoid state regulation).

State oversight of interconnected VoIP ETCs in the federal Universal Service context is not a matter of state regulation. Rather, it is authority delegated to the states by *Congress* and the *FCC* to monitor the receipt and use of *federal* money.⁷⁷ States impose ETC conditions to discharge their FCC-mandated duty to advance *federal* Universal Service goals and protect the at-risk consumers who receive *federal* Universal Service benefits.⁷⁸ This is the state performing a regulatory function on behalf of the *federal* government; this is not state regulation *per se*.

Moreover, there is no “federal policy of nonregulation” when it comes to interconnected VoIP and federal Universal Service support.⁷⁹ Even though the FCC has declined to classify interconnected VoIP as either a telecommunications service or an information service,⁸⁰ it has made clear that, as recipients of federal Universal Service support, interconnected VoIP providers are governed by sections 214 and 254 of the Act regardless of their regulatory classification.⁸¹

In addition, the FCC actively regulates interconnected VoIP providers in the federal Universal Service space.⁸² In its *2011 Transformation Order*, the FCC included interconnected VoIP in its technology-neutral “voice telephony” definition.⁸³ Additionally, the use of interconnected VoIP by broadband providers to meet their federal Universal Service voice telephony requirements was contemplated in both the CAF and RDOF orders.⁸⁴ Through it all,

⁷⁷ 47 U.S.C. § 214(e)(2); 47 U.S.C. § 254(f). The *Charter Order* would not gain precedential value in the federal Universal Service context even if the federal policy of nonregulation applied. As Supreme Court Justice Thomas reasoned, “[i]t is doubtful whether a federal policy—let alone a policy of nonregulation—is ‘Law’ for purposes of the Supremacy Clause. Under our precedent, such a policy likely is not final agency action because it does not mark ‘the consummation of the agency’s decisionmaking process’ or determine Charter’s ‘rights or obligations.’ . . . Giving pre-emptive effect to a federal agency policy of nonregulation thus expands the power of both the Executive and the Judiciary. It authorizes the Executive to make ‘Law’ by declining to act, and it authorizes the courts to conduct ‘a freewheeling judicial inquiry’ into the facts of federal nonregulation, rather than the constitutionally proper ‘inquiry into whether the ordinary meanings of state and federal law conflict[.]’” (internal citations omitted). *Lipschultz v. Charter Advanced Servs.*, 205 L. Ed. 2d 262, **7–8 (2019) (Thomas, J., dissenting) (petition for cert. denied).

⁷⁸ See generally section IV, subsections A and B of these Comments.

⁷⁹ *Charter Order* at 718–19.

⁸⁰ See *id.* at 718 & nn.2–4 (acknowledging that the FCC has not yet resolved the overarching classification issue of interconnected VoIP); see also *In the Matter of Universal Service Contribution Methodology et al.*, WC Docket No. 06-122 et al., Further Notice of Proposed Rulemaking, FCC 12-46, n.19 (2012) (“Although the [FCC] has not addressed the regulatory classification of interconnected VoIP services under the Act, the [FCC] has concluded that interconnected VoIP providers are ‘providers of interstate telecommunications’ for purposes of universal service.”).

⁸¹ *2011 Transformation Order*, para. 63 (“Our authority to promote universal service in this context does not depend on whether interconnected VoIP services are telecommunications services or information services under the Communications Act.”) & n.67 (“If interconnected VoIP services are telecommunications services, our authority under section 254 to define universal service after ‘taking into account advances in telecommunications and information technologies and services’ enables us to include interconnected VoIP services as a type of voice telephony service entitled to federal universal service support. And, . . . if interconnected VoIP services are information services, we have authority to support the deployment of broadband networks used to provide such services.”).

⁸² See *id.*, paras. 61–69 (discussing the interplay between federal Universal Service regulation and interconnected VoIP).

⁸³ See *id.*, paras. 77–78 (including voice services provided over broadband networks in the definition of voice telephony services).

⁸⁴ See *RDOF Order*, para. 43 (“Section 254 of the [Act] gives the Commission the authority to support telecommunications services, which the Commission has defined as ‘voice telephony service.’ The Commission made clear when it adopted the standalone voice requirement as a condition of receiving [CAF] support in 2011 that the

(Footnote Continued on Next Page)

the FCC has upheld the authority of states to designate and regulate federal Universal Service ETCs.⁸⁵

The delegation of authority from Congress, as well as the FCC's continued utilization of the federal–state partnership, demonstrates that Commission-mandated ETC requirements are not only permissible, they are compulsory. Any other outcome would compel the Commission to grant ETC status while stripping it of any enforcement power or ability to redress federal Universal Service violations. For the limited purpose of discharging its duty under the federal–state partnership, the Commission may require RDOF Phase I interconnected VoIP providers to comply with Commission-mandated ETC requirements.

ANALYSIS

The Commission's desire to maximize broadband support for Minnesotans is laudable. The State should move as quickly as possible to connect all its citizens and communities to fast, reliable broadband. With this goal in mind, it is vital for the Commission to adopt strong ETC obligations to ensure that rural Minnesotans experience the full benefits of RDOF Phase I support.

The final sections of the OAG's Comments focus on existing and proposed ETC obligations for RDOF Phase I applicants seeking an ETC designation in Minnesota. Sections V and VI discuss the current FCC and Commission ETC requirements for High Cost Program ETCs that are applicable to RDOF Phase I applicants. Section VII contains OAG-proposed obligations for Minnesota RDOF Phase I ETCs based on its experiences in recent Commission ETC-related dockets. Section VIII concludes with a summary of the obligations that the Commission should require for RDOF Phase I applicants seeking an ETC designation in Minnesota.

V. AN ETC MUST COMPLY WITH CERTAIN FEDERAL UNIVERSAL SERVICE OBLIGATIONS TO RECEIVE RDOF PHASE I SUPPORT.

The FCC has established mandatory obligations that an ETC must comply with to receive, and continue receiving, federal Universal Service support. These obligations advance federal Universal Service goals and safeguard consumer interests. Lack of knowledge of the FCC's ETC requirements does not excuse noncompliance; ETCs are expected to familiarize themselves with the FCC rules and orders that apply to their federal Universal Service participation.⁸⁶

definition of the supported service, voice telephony service, is technologically neutral, allowing ETCs to provision voice service over many platforms. . . . The record does not show that these facts have changed, and voice telephony is still the supported service. Therefore, we require all ETCs receiving Rural Digital Opportunity Fund support to provide standalone voice service meeting the reasonable comparability requirements in the areas in which they receive support.”); *2011 Transformation Order*, para. 80 (“As a condition of receiving [CAF] support, we require ETCs to offer voice telephony as a standalone service throughout their designated service area. . . . ETCs may use any technology in the provision of voice telephony service.”).

⁸⁵ See, e.g., RDOF Auction Notice, para. 135 (acknowledging that states have the primary responsibility for ETC designation) & n.305 (directing RDOF Phase I applicants to the *2005 ETC Order*).

⁸⁶ See 47 C.F.R. § 0.406 (“Persons having business with the Commission should familiarize themselves with those portions of its rules and regulations pertinent to such business.”); see also RDOF Auction Notice, para. 137 & n.313 (requiring applicants to familiarize themselves with applicable ETC requirements and conduct the due diligence necessary to comply with ETC obligations).

A. THE FCC HAS ESTABLISHED OVERARCHING OBLIGATIONS FOR ALL ETCs.

The FCC has established overarching obligations for all ETCs that receive federal Universal Service support, regardless of the program in which they participate. An ETC must fulfill the following obligations:

FCC General ETC Obligations⁸⁷
<ul style="list-style-type: none"> • Use federal Universal Service support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended.⁸⁸
<ul style="list-style-type: none"> • Provide voice telephony services that include: <ul style="list-style-type: none"> ○ Voice grade service; ○ Access to 911; and ○ Toll limitation services.⁸⁹
<ul style="list-style-type: none"> • Offer broadband services in the area where it receives High Cost support.⁹⁰
<ul style="list-style-type: none"> • Demonstrate that its ETC designation is in the public interest.⁹¹
<ul style="list-style-type: none"> • Offer its broadband and voice services using its own facilities, or a combination of its own facilities and the resale of another carrier’s services (including the services offered by another ETC).⁹²
<ul style="list-style-type: none"> • Advertise the availability of the services and their corresponding charges using media of general distribution.⁹³

B. THE RDOF ORDER ESTABLISHES RDOF-SPECIFIC ETC REQUIREMENTS TO ENSURE THE DEPLOYMENT OF HIGH-SPEED BROADBAND NETWORKS TO UNSERVED RURAL AMERICANS.

In addition to its overarching ETC requirements, the FCC established *RDOF Order*-specific obligations that ETCs must meet. These obligations ensure that RDOF Phase I support is used for wholly unserved areas and does not “go toward overbuilding areas that already have service.”⁹⁴ The obligations include meeting specific service milestones,⁹⁵ which begin regardless of when an ETC is authorized to receive support and occur on December 31 of each year thereafter.⁹⁶ Specifically, RDOF Phase I ETCs must meet the following obligations:

⁸⁷ This list is not exhaustive. It is incumbent on the RDOF Phase I support recipient to familiarize itself with the applicable FCC rules and orders.

⁸⁸ 47 C.F.R. § 54.7(a).

⁸⁹ *Id.* § 54.101(a), (b).

⁹⁰ *Id.* § 54.101(c).

⁹¹ *Id.* § 201(c) (“Upon request and consistent with the public interest, convenience, and necessity, the state commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an [ETC] for a service area . . .”) (emphasis added).

⁹² *Id.* § 54.201(d)(1).

⁹³ *Id.* § 54.201(d)(2).

⁹⁴ *RDOF Order*, para. 13.

⁹⁵ *Id.*, paras. 45–55. Compliance with the service milestones is determined on a statewide basis. Thus, an ETC is considered in compliance with a milestone if it offers service at the required performance levels to the required percentage of locations across all its awarded areas in a given state. *Id.*, para. 54.

⁹⁶ *Id.*, para. 53. “For example, if [an ETC] is authorized to begin receiving support on October 10, 2021, it must complete its 40% milestone by December 31, 2024.” *Id.*, n.146.

RDOF-Specific Phase I ETC Obligations⁹⁷
<ul style="list-style-type: none"> • Commercially offer voice and broadband service to all eligible homes and small businesses within their RDOF Phase I-awarded areas,⁹⁸ including locations that are newly built after the support award that reasonably request service.⁹⁹
<ul style="list-style-type: none"> • Offer the voice and broadband services at rates that are reasonably comparable to rates offered in urban areas.¹⁰⁰
<ul style="list-style-type: none"> • Offer standalone voice service meeting the reasonable comparability requirements in the areas in which the ETC receives RDOF support.¹⁰¹ <ul style="list-style-type: none"> ○ “[A] broadband provider may satisfy its voice obligation by offering voice service through an affiliate or by offering a managed voice solution (including VoIP) through a third-party vendor, <i>but a provider cannot simply rely on the availability of over-the-top voice options to satisfy this obligation.</i>”¹⁰²
<ul style="list-style-type: none"> • Advertise the availability of their voice service throughout their service areas and advertise the availability of broadband service within their service areas.¹⁰³
<ul style="list-style-type: none"> • Comply with applicable Lifeline rules (discussed in more detail below).¹⁰⁴
<p>Bid on all Category One telecommunications and Internet access FCC Forms 470 posted by schools and libraries in census blocks where the ETC receives RDOF Phase I support.¹⁰⁵ Bids must be at rates reasonably comparable to rates charged to schools and libraries in urban areas for comparable offerings.¹⁰⁶</p>
<ul style="list-style-type: none"> • Commercially offer RDOF voice and broadband service to 40% of the applicable number of state locations by the end of the third full calendar year following funding authorization, and 20% each year thereafter.¹⁰⁷
<ul style="list-style-type: none"> • Offer RDOF broadband service meeting the performance standards for the applicable performance tier and latency level.¹⁰⁸

⁹⁷ This list is not exhaustive. It is incumbent on the RDOF Phase I support recipient to familiarize itself with the applicable FCC rules and orders. Also, the OAG does not discuss here RDOF Phase I ETC obligations in later funding years. Instead, it will address those requirements in the applicable annual ETC recertification proceedings.

⁹⁸ *RDOF Order*, para. 6. An ETC meets the “commercially offering” requirement if it offers voice and/or broadband service to a location or could provide it within ten business days upon request. *Id.*, para. 54

⁹⁹ *Id.*, para. 52 (“[ETCs] are not obligated to offer service to . . . newly built locations that do not request service, or to those with exclusive arrangements with other providers.”).

¹⁰⁰ *Id.*, para. 42; *see also* 47 C.F.R. § 54.805(a).

¹⁰¹ *RDOF Order*, paras. 42–43. The FCC explicitly rejected arguments that “RDOF recipients should not be required to offer standalone voice service, because, consumers increasingly are subscribing to voice as a component of their broadband connections.” *Id.*, para. 43. Instead, the FCC reasoned that “auction funding recipients, unlike funding recipients of other [federal Universal Service Fund] mechanisms, ‘may be the only ETC offering voice in some areas and not all consumers may want to subscribe to broadband service.’” *Id.*

¹⁰² RDOF Auction Notice, para. 139 (emphasis added). Two RDOF Phase I applicants, Red River Communications and Savage Communications referenced over-the-top voice in their ETC petitions. The OAG contacted both companies on March 22, 2021. Both companies explained that although they will have an upstream voice provider, they will provide voice services directly to their customers, will actively manage the customer relationship, and will engage in protocol conversion at the customer premises. The OAG is satisfied that the companies are not “simply relying on the availability of over-the-top voice options” to satisfy the standalone voice requirement.

¹⁰³ *RDOF Order*, para. 54.

¹⁰⁴ *Id.*, para. 44.

¹⁰⁵ *See* 47 C.F.R. § 54.805(c).

¹⁰⁶ *Id.*

¹⁰⁷ *RDOF Order*, paras. 45, 48.

¹⁰⁸ *See* 47 C.F.R. § 54.805(b).

<ul style="list-style-type: none"> • File location and technology data in the HUBB by March 1 each year.¹⁰⁹
<ul style="list-style-type: none"> • Annually certify after they have met their final service milestone, including a certification that the network they operated the prior year meets the applicable performance requirements.¹¹⁰
<ul style="list-style-type: none"> • Fulfill the reporting obligations set forth in sections 54.313, 54.314, and 54.316 of the FCC’s rules.¹¹¹
<ul style="list-style-type: none"> • Annually report the number of community anchor institutions to which they begin providing broadband service for the first time, including the number, names, and addresses of those anchor institutions.¹¹²
<ul style="list-style-type: none"> • Annually identify the total amount of RDOF funding used for capital expenditures in the previous calendar year and certify the availability of funds for all project costs that will exceed RDOF support for the next calendar year.¹¹³
<ul style="list-style-type: none"> • Annually certify bidding in the federal Universal Service Schools and Libraries Program (i.e., E-Rate).¹¹⁴
<ul style="list-style-type: none"> • Meet the compliance measures, recordkeeping requirements, and audit requirements set forth in section 54.320(a)–(c) of the FCC’s rules.¹¹⁵
<ul style="list-style-type: none"> • Beginning in year three, notify the FCC within ten days of a service milestone deadline if the deadline will not be met. This includes describing why the deadline will not be met.¹¹⁶

ETCs that do not meet their annual service milestones will be subject to noncompliance measures including, but not necessarily limited to, quarterly reporting and the withholding of RDOF Phase I support.¹¹⁷ ETCs that fail to meet the terms and conditions of federal Universal Service High Cost Program support generally are subject to other sanctions including, but not necessarily limited to, FCC enforcement procedures and penalties, potential revocation of ETC status, and suspension or debarment from the federal Universal Service programs.¹¹⁸

C. THE FCC’S HIGH COST RULES ESTABLISH PROGRAM-SPECIFIC ETC REQUIREMENTS TO ENSURE THE DEPLOYMENT OF HIGH-SPEED BROADBAND NETWORKS TO RURAL AMERICANS.

Pursuant to the FCC’s rules, each year High Cost Program ETCs must provide information and a certification demonstrating:

¹⁰⁹ *RDOF Order*, para. 56. The HUBB is the High Cost Universal Broadband portal. ETCs that receive modernized High Cost Program funding must file deployment data in the HUBB to show where they are building out high-speed Internet service using their federal Universal Service support. Although ETCs *must* file location data by March 1 each year, they are encouraged to file their location data on a rolling basis. *Id.*

¹¹⁰ *Id.*, para. 57.

¹¹¹ See 47 C.F.R. § 54.806(a).

¹¹² *RDOF Order*, paras. 44, 57.

¹¹³ *Id.*, para. 57.

¹¹⁴ *Id.*, n.162.

¹¹⁵ 47 C.F.R. § 54.806(b).

¹¹⁶ *RDOF Order*, para. 64 & nn.177, 281.

¹¹⁷ *Id.*, paras. 58–64.

¹¹⁸ *Id.*, para. 63.

FCC High Cost Program ETC Obligations¹¹⁹
<ul style="list-style-type: none"> • Holding company, operating company, affiliate, and any doing-business-as or other branding designations, as well as the related Study Area Codes.¹²⁰
<ul style="list-style-type: none"> • They are able to function in emergency situations.¹²¹
<ul style="list-style-type: none"> • Their voice services are no more than two standard deviations above the applicable national average urban rate for voice service.¹²²
<ul style="list-style-type: none"> • Their pricing of a service that meets the FCC’s broadband public interest obligations is no more than the applicable benchmark, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states where the ETC receives support.¹²³
<ul style="list-style-type: none"> • The ETC <i>had discussions with</i> Tribal governments (as applicable) that, at a minimum, included: <ul style="list-style-type: none"> ○ A needs assessment and deployment planning with a focus on Tribal community anchor institutions; ○ Feasibility and sustainability planning; ○ Marketing services in a culturally sensitive manner; ○ Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and ○ Compliance with Tribal business and licensing requirements.¹²⁴
<ul style="list-style-type: none"> • The results of network performance tests pursuant to the methodology and in the format determined by the FCC’s Wireline Competition and Wireless Telecommunications Bureaus, and the Office of Engineering and Technology.¹²⁵

D. THE FCC’S LIFELINE RULES AND ORDERS ESTABLISH PROGRAM-SPECIFIC ETC REQUIREMENTS FOR HIGH COST SUPPORT RECIPIENTS TO LOWER THE MONTHLY COST OF PHONE AND INTERNET FOR LOW-INCOME CONSUMERS.

Pursuant to the FCC’s rules and orders, High Cost Program ETCs (i.e., RDOF ETCs) must comply with the following Lifeline obligations:

FCC Lifeline Program Obligations for High Cost Program ETCs¹²⁶
<ul style="list-style-type: none"> • To offer Lifeline service to qualifying low-income consumers throughout their designated service areas.¹²⁷ <ul style="list-style-type: none"> ○ “If an Auction 904 support recipient has obtained an ETC designation that covers more area than the eligible census blocks in its winning bids, that support recipient

¹¹⁹ This list is not exhaustive. It is incumbent on the RDOF Phase I support recipient to familiarize itself with the applicable FCC rules and orders.

¹²⁰ 47 C.F.R. § 54.313(a)(4).

¹²¹ *Id.* § 54.313(a)(1).

¹²² *Id.* § 54.313(a)(2).

¹²³ *Id.* § 54.313(a)(3).

¹²⁴ *Id.* § 54.313(a)(5).

¹²⁵ *Id.* § 54.313(a)(6).

¹²⁶ This list is not exhaustive. It is incumbent on the RDOF Phase I support recipient to familiarize itself with the applicable FCC rules and orders.

¹²⁷ 47 C.F.R. § 54.405(a).

<p>has the obligation to provide Lifeline services throughout its designated service area, including in areas where it cannot use its Auction 904 support.”¹²⁸</p>
<ul style="list-style-type: none"> • To advertise the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.¹²⁹
<ul style="list-style-type: none"> • To indicate on all materials describing Lifeline service, using easily understood language, that Lifeline is a government assistance program, Lifeline service is non-transferable, only eligible consumers may enroll in the Lifeline Program, and Lifeline is limited to one discount per household.¹³⁰ <ul style="list-style-type: none"> ○ This includes all Lifeline print, audio, video, and web materials, including application and certification forms.¹³¹ ○ The ETC must also disclose its name on all materials that describe the Lifeline service.¹³²
<ul style="list-style-type: none"> • High Cost Program ETCs that receive Lifeline Program support must annually report: <ul style="list-style-type: none"> ○ Holding company, operating company, affiliate, and any doing-business-as or other branding designations, as well as the applicable Study Area Codes; and ○ Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan.¹³³ • In addition, a High Cost Program ETC that receives Lifeline support must annually: <ul style="list-style-type: none"> ○ Certify that it is in compliance with all federal Lifeline procedures;¹³⁴ ○ Certify that it has policies and procedures in place to ensure the eligibility of its Lifeline subscribers;¹³⁵ ○ Provide the results of its annual Lifeline recertification efforts to the FCC and USAC;¹³⁶ ○ Provide its annual Lifeline recertification results for subscribers residing on Tribal lands to the applicable Tribal governments;¹³⁷ and ○ Certify that the ETC is in compliance with the Lifeline minimum service standards set forth in the federal Universal Service regulations.¹³⁸

An ETC’s annual FCC Form 481 will be considered non-compliant if: “The [provided Lifeline] website link is inactive or [the] page cannot be found; [t]he ETC’s ‘Home Page’ is not specific to the Lifeline Program; [t]he web page does not provide information on minutes or usage parameters associated with Lifeline Program plans; [t]he web page discusses Lifeline Program eligibility and sign-up, but not terms and conditions or available Lifeline Program service plan

¹²⁸ RDOF Auction Notice, para. 137.

¹²⁹ 47 C.F.R. § 54.405(b).

¹³⁰ *Id.* § 54.405(c).

¹³¹ *Id.*

¹³² 47 C.F.R. § 54.405(d).

¹³³ *Id.* § 54.422(a).

¹³⁴ *Id.* § 54.416(a)(2).

¹³⁵ *Id.* § 54.416(a)(1).

¹³⁶ *Id.* § 54.416(b).

¹³⁷ *Id.*

¹³⁸ 47 C.F.R. § 54.416(a)(3).

price(s); or [it d]oes not provide information on charges incurred for toll calls and additional services.”¹³⁹

VI. TO FULFILL ITS DUTY UNDER THE FEDERAL–STATE PARTNERSHIP, THE COMMISSION HAS ADOPTED OBLIGATIONS FOR HIGH COST PROGRAM SUPPORT RECIPIENTS SEEKING AN ETC DESIGNATION IN MINNESOTA.

In furtherance of its duty to preserve and advance federal Universal Service, the Commission has adopted obligations for High Cost Program support recipients that seek an ETC designation in Minnesota. At a minimum, Minnesota petitions for ETC designation must demonstrate that the applicant meets the basic services, facilities, and advertising requirements of FCC Rule 54.201, and that the requested designation is in the public interest.¹⁴⁰ The Commission has also adopted obligations for High Cost Program CAF Phase II ETCs that it should apply to High Cost Program RDOF Phase I ETCs. Specifically, the Commission should require RDOF Phase I applicants to:

Commission Obligations for High Cost Program ETCs¹⁴¹
<ul style="list-style-type: none"> • Offer the basic services required by FCC Rule 54.101 and section 214(e)(1) of the Act.¹⁴²
<ul style="list-style-type: none"> • Offer those services using its own facilities or a combination of its facilities and resale of another carrier’s services, including the services offered by another eligible ETC.¹⁴³ However, pursuant to FCC’s RDOF requirements, <i>a provider may not rely on the availability of over-the-top voice options to satisfy this obligation.</i>¹⁴⁴
<ul style="list-style-type: none"> • Advertise the availability of those services and their charges using media of general distribution.¹⁴⁵
<ul style="list-style-type: none"> • Demonstrate that the designation is in the public interest.¹⁴⁶
<ul style="list-style-type: none"> • Annually file its FCC Form 481 with the state.¹⁴⁷
<ul style="list-style-type: none"> • Concurrent with its annual FCC Form 481 filing, file with the Commission an affidavit that includes: <ul style="list-style-type: none"> ○ The position of the affiant; ○ A certification that the affiant understands and is familiar with the requirements of the FCC concerning federal Universal Service funding;

¹³⁹ USAC Website, Lifeline Additional Requirements – Annual Filings, <https://www.usac.org/lifeline/additional-requirements/report-data-annually-fcc-form-481/> (last visited Mar. 18, 2021).

¹⁴⁰ Minnesota Department of Commerce Website, Eligible Telecommunications Carriers (ETCs), available at <https://mn.gov/commerce/industries/telecom/etc/> (last visited Mar. 18, 2021). See also 47 C.F.R. § 54.201.

¹⁴¹ This list is not necessarily exhaustive. It is incumbent on the RDOF Phase I support recipient to familiarize itself with the applicable Commission rules and orders.

¹⁴² See *In the Matter of Assist Wireless’s Petition for ETC Designation in Minnesota*, Docket No. P-6978/M-17-213, ORDER GRANTING PETITION FOR ETC DESIGNATION WITH CONDITIONS, Attach. A at 2 (Nov. 15, 2017) (“*Assist Order*”). See also 47 U.S.C. § 214(e)(1); 47 C.F.R. 54.101.

¹⁴³ *Assist Order*, Attach. A at 2; 47 C.F.R. 54.201(d)(1).

¹⁴⁴ *Assist Order*, Attach. A at 2; RDOF Auction Notice, para. 139.

¹⁴⁵ *Assist Order*, Attach. A. at 2; 47 C.F.R. 54.201(d)(2).

¹⁴⁶ *Assist Order*, Attach. A at 3; 47 C.F.R. 54.201(c).

¹⁴⁷ *2019 ETC Order* at 3–4.

- A certification that the ETC has used the High Cost Program support received only for the provision, maintenance, and upgrading of facilities and services for which the support was intended, and will appropriately use the support in the coming year;
 - A certification that the ETC is compliant with applicable rules on service quality and consumer protection; and
 - A certification that there is sufficient backup power to ensure functionality without an external power source, and the company can reroute traffic around damaged facilities and can manage traffic spikes resulting from emergencies.¹⁴⁸
- Work with the Commission’s and the Department of Commerce’s (“Department”) Tribal Liaisons and conduct the appropriate tribal outreach, if it will provide service on Tribal lands.¹⁴⁹

VII. THE OAG PROPOSES ETC OBLIGATIONS DESIGNED TO ENSURE THAT RDOF PHASE I ETC SUPPORT IS USED FOR ITS INTENDED PURPOSE AND THE SUPPORTED SERVICES ARE OFFERED IN A WAY THAT PROTECTS MINNESOTA CONSUMERS.

In previous Commission proceedings, the OAG proposed obligations to ensure that Minnesota ETCs use the federal Universal Service support they receive for its intended purpose and offer the supported services in a way that protects Minnesota consumers. Drawing from its experiences in those proceedings, the OAG proposes obligations that the Commission should adopt for RDOF Phase I applicants seeking ETC designation in Minnesota.¹⁵⁰ These obligations will ensure that the RDOF Phase I ETCs use their support for its intended purpose and that the supported services are offered in a way that protects Minnesota consumers.

Item No.	Proposed Obligation	Basis for Obligation
1	<p><u>Develop a Consumer Service Inquiry Process</u> – Require RDOF Phase I ETCs to include a brief (i.e., no more than one page) summary with their first annual certification filing describing:</p> <ul style="list-style-type: none"> ● how they determine whether they offer RDOF Phase I-supported services in a particular consumer’s area; and 	<p>Confusion about whether High Cost Program-supported services are available in a particular consumer’s geographic area is an issue that has arisen in prior Commission ETC-related proceedings.¹⁵¹</p>

¹⁴⁸ *In the Matter of Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of the Federal Universal Service Support Required Pursuant to [47] C.F.R. [§] 54.313*, Docket No. P-999/PR-18-8, ORDER CERTIFYING ELIGIBLE TELECOMMUNICATIONS CARRIERS’ USE OF FEDERAL HIGH-COST SUBSIDY AND REQUIRING COMMENT PERIOD at 3 (Oct. 24, 2018).

¹⁴⁹ *2019 ETC Order* at 3.

¹⁵⁰ The OAG may modify or supplement its proposed obligations once it has reviewed the Department’s comments in this proceeding.

¹⁵¹ *See, e.g., In the Matter of the Annual Certification Related to ETC Use of Federal Universal Service Support*, Docket No. P-999/PR-20-8, Comments of the Office of the Attorney General at 12 (Mar. 30, 2020) (discussing a Minnesota consumer’s difficulty obtaining accurate information about the availability of CAF-supported high-speed broadband at his home).

	<ul style="list-style-type: none"> • how they convey that information to a consumer that asks about the availability of high-speed broadband at his/her location. 	
2	<p><u>Comply with Consumer Protection Obligations that Advance Federal Universal Service Goals and Protect Minnesota Consumers</u> – The Commission should adopt the list of consumer protection obligations developed by the Department for ETCs that are not required to obtain a Certificate of Authority to operate in Minnesota. This will ensure that they offer their RDOF Phase I-supported services in a way that advances federal Universal Service goals and protects Minnesota consumers.</p>	As previously discussed, the federal–state partnership compels the Commission to adopt those ETC obligations necessary to advance federal Universal Service goals and protect consumers. ¹⁵²
3	<p><u>Provide Annual Status Updates for RDOF Years One and Two</u> – To remain apprised of an RDOF Phase I ETC’s broadband network buildout, the Commission should require Minnesota ETCs to include a brief (e.g., no more than one page) broadband buildout update with their annual certification filing for the first two years that they receive RDOF Phase I support.</p>	The <i>RDOF Order</i> does not require an RDOF Phase I ETC to provide a broadband deployment update until three years after the ETC first receives support. ¹⁵³
4	<p><u>Monitor and Participate in Open Commission ETC-Related Proceedings</u> – Because there is an open ETC proceeding that could impact the obligations of RDOF Phase I applicants that receive a Minnesota ETC designation, the Commission should:</p> <ul style="list-style-type: none"> • Encourage them to participate in the proceeding as appropriate; and • Require them to monitor the proceeding (and any future ETC 	There is an open Commission proceeding concerning the advertising, outreach, and offering of federal Universal Service Lifeline by High Cost ETCs that may impact the obligations of RDOF Phase I applicants subsequent to their designation as ETCs in Minnesota. ¹⁵⁴

¹⁵² See 47 U.S.C. § 254(f).

¹⁵³ See *RDOF Order*, paras. 45, 99 (creating an optional 20% service milestone in year two and referencing the mandatory 40% service milestone in year three).

¹⁵⁴ See generally *In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High Cost ETCs*, Docket No. P-999/CI-20-747.

	proceedings, as applicable) for additional ETC obligations.	
--	---	--

VIII. SUMMARY OF RECOMMENDATIONS

In sum, to ensure the RDOF Phase I support received by Minnesota ETCs is used for its intended purpose and the supported services are offered in a way that protects Minnesota consumers, the Commission should adopt the following obligations for RDOF Phase I ETCs:

- Acknowledge and agree to comply with the FCC-mandated general ETC obligations discussed in section V, subsection A of these Comments;
- Acknowledge and agree to comply with the FCC-mandated RDOF Phase I-specific ETC obligations discussed in section V, subsection B of these Comments;
- Acknowledge and agree to comply with the FCC-mandated High Cost Program-specific ETC obligations discussed in section V, subsection C of these Comments;
- Acknowledge and agree to comply with the FCC-mandated Lifeline Program-specific ETC obligations for High Cost Program ETCs discussed in section V, subsection D of these Comments;
- Acknowledge and agree to comply with the Commission obligations for High Cost Program ETCs discussed in section VI of these Comments; and
- Agree to comply with the following OAG-proposed ETC obligations:
 - Develop a consumer service inquiry process;
 - Comply with the consumer-protection obligations identified by the Department;
 - Provide network buildout updates for the first two years of RDOF Phase I support; and
 - Monitor open Commission ETC-related proceedings for additional obligations that may arise after the receipt of an RDOF Phase I ETC designation.

CONCLUSION

Assuming the Commission adopts the OAG’s proposed obligations, the OAG recommends ETC designation for most of the companies that seek it from the Commission.¹⁵⁵ The Commission has a duty to ensure that the RDOF Phase I support received by Minnesota ETCs is used to provide reliable, high-quality voice and broadband services throughout the State. An ETC must account for how it operates pursuant to its ETC designation and how it spends its RDOF Phase I support. A company that seeks an ETC designation in Minnesota must comply with the RDOF Phase I ETC obligations the Commission adopts to advance federal Universal Service and protect consumers. Receipt of federal Universal Service support is a matter of *privilege, not right*, and the Commission

¹⁵⁵ See *supra* n. 2.

should decline ETC designation for any company that does not wish to be bound by the Commission's ETC requirements.

Dated: March 26, 2021

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ **Kristin Berkland**

KRISTIN BERKLAND
Assistant Attorney General
Atty. Reg. No. 0394804

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ATTORNEYS FOR OFFICE OF THE
ATTORNEY GENERAL—RESIDENTIAL
UTILITIES DIVISION

Attachment A

**Individual Commission Dockets for
Companies Seeking RDOF Phase I ETC Designation in Minnesota**

	PUC Docket No.	Petitioner Name
1	PR-21-26	Starlink Services, LLC d/b/a Space Exploration Technologies Corp. (SpaceX)
2	PR-21-31	AMG Technology Group, LLC d/b/a NextLink Internet
3	PR-21-32	Aspire Networks 1, LLC/ Consortium of AEG and Heron Broadband I ¹
4	PR-21-52	Arrowhead Electric Cooperative
5	PR-21-53	Savage Communications
6	PR-21-56	Paul Bunyan Rural Telephone Cooperative d/b/a Paul Bunyan Communications
7	PR-21-57	Wikstrom Telephone Company
8	PR-21-62	Consolidated Telephone Company d/b/a CTC
9	PR-21-67	Roseau Electric Cooperative, Inc.
10	PR-21-73	Gardonville Cooperative Telephone Association
11	PR-21-77	Farmers Mutual Telephone Company
12	PR-21-81	Federated Telephone Cooperative
13	PR-21-83	Halstad Telephone Company
14	PR-21-84	Garden Valley Telephone Cooperative d/b/a Garden Valley Technologies (Halstad Telephone Company)
15	PR-21-92	Winnebago Cooperative Telecom Association
16	PR-21-124	Midcontinent Communications
17	PR-21-132	Red River Rural Telephone Association d/b/a Red River Communications (Great Plains Consortium)
18	PR-21-133	LTD Broadband LLC
19	PR-21-158	CenturyLink Communications, LLC
20	PR-21-161	Cable One VoIP LLC (Wisper-CABO 904 Consortium)
21	PR-21-180	Interstate Telecommunications Cooperative, Inc. (Great Plains Consortium)
22	No ETC petition filed with Commission	Consolidated Communications, Inc. ²

¹ There is no need for the OAG to make an ETC recommendation for this company. It withdrew its petition for ETC designation on March 1, 2021. See generally *In the Matter of Petition of Aspire Networks 2, LLC for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Support*, Docket No. PR-21-32, Letter (Mar. 1, 2021). The Commission’s Executive Secretary granted the withdrawal request on March 17, 2021. Docket No. P7050/M-21-32, NOTICE AND ORDER APPROVING PETITION TO WITHDRAW FILING (Mar. 17, 2021).

² The OAG does not recommend ETC designation for Consolidated Communications, Inc. To the OAG’s knowledge, this company did not file an ETC petition with the Commission.

	PUC Docket No.	Petitioner Name
23	No ETC petition filed with Commission	Fond du Lac Communications, Inc. ³
24	No ETC petition filed with Commission	Windstream Services, LLC ⁴

³ The OAG does not recommend ETC designation for Fond du Lac Communications, Inc. To the OAG’s knowledge, this company did not file an ETC petition with the Commission.

⁴ The OAG does not recommend ETC designation for Windstream Services, LLC. To the OAG’s knowledge, this company did not file an ETC petition with the Commission.

Attachment B

List of RDOF Phase I Winning Bidders for Minnesota with Location and Support Amounts

Long-Form Applicant Name	Total No. of Eligible Census Blocks	Total No. of Locations	Total 10 Years of Support	Winning Bidder
AMG Technology Investment Group, LLC d/b/a NextLink Internet	384	1,408	\$3,736,316.00	
Arrowhead Electric Cooperative, Inc.	440	4,879	\$18,462,273.10	
Aspire Networks 2, LLC ¹	155	1,150	\$6,709,428.00	Consortium of AEG and Heron Broadband I
Cable One VoIP LLC	6	19	\$1,671.00	Wisper-CABO 904 Consortium
CenturyLink Communications, LLC	516	3,265	\$15,646,093.10	
Consolidated Communications of Minnesota Company ²	2	12	\$11,126.00	Consolidated Communications, Inc.
Consolidated Telephone Company d/b/a CTC	121	979	\$2,040,278.70	Minnesota Connections c/o Consolidated Tel Company
Farmers Mutual Telephone Company	116	332	\$759,822.00	
Federated Telephone Cooperative	85	248	\$537,399.00	
Fond du Lac Communications Inc ³	96	728	\$1,046,123.00	
Garden Valley Telephone Cooperative d/b/a Garden Valley Technologies	186	492	\$2,792,139.40	Halstad Telephone Company
Gardonville Cooperative Telephone Association	10	24	\$63,903.00	
Halstad Telephone Company	38	111	\$325,917.00	
Interstate Telecommunications Cooperative, Inc	153	391	\$51,748.60	Great Plains Consortium
LTD Broadband LLC	18,110	102,005	\$311,877,936.40 ⁴	
Midcontinent Communications	688	6,058	\$4,453,803.70	
Paul Bunyan Rural Telephone Cooperative d/b/a Paul Bunyan Communications	779	5,088	\$16,307,892.10	

¹ There is no need for the OAG to make an ETC recommendation for this company. It withdrew its petition for ETC designation on March 1, 2021. See generally *In the Matter of Petition of Aspire Networks 2, LLC for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Support*, Docket No. PR-21-32, Letter (Mar. 1, 2021). The Commission's Executive Secretary granted the withdrawal request on March 17, 2021. Docket No. P7050/M-21-32, NOTICE AND ORDER APPROVING PETITION TO WITHDRAW FILING (Mar. 17, 2021).

² The OAG does not recommend ETC designation for Consolidated Communications, Inc. To the OAG's knowledge, this company did not file an ETC petition with the Commission.

³ The OAG does not recommend ETC designation for Fond du Lac Communications, Inc. To the OAG's knowledge, this company did not file an ETC petition with the Commission.

⁴ LTD Broadband LLC incorrectly states in its Petition for Expansion that it was awarded \$31,187,793.64 in RDOF Phase I support. See *In the Matter of the Petition of LTD Broadband LLC to Expand its Designation as an Eligible Telecommunications Carrier*, Docket No. PR-21-133, Attach. 2 at 3 (Feb. 17, 2021).

Long-Form Applicant Name	Total No. of Eligible Census Blocks	Total No. of Locations	Total 10 Years of Support	Winning Bidder
Red River Rural Telephone Association, Inc d/b/a Red River Communications	5	11	\$29,952.00	Great Plains Consortium
Roseau Electric Cooperative, Inc.	76	266	\$1,228,494.00	
Savage Communications	492	4,541	\$6,090,479.10	
Starlink Services, LLC	1,379	7,529	\$8,424,807.60	Space Exploration Technologies Corp. (SpaceX)
Wikstrom Telephone Company	93	228	\$983,637.00	
Windstream Lakedale, Inc. ⁵	257	2,899	\$6,548,964.10	Windstream Services LLC, Debtor-In-Possession
Winnebago Cooperative Telecom Association	57	178	\$20,541.70	
Total	24,244	142,841	\$408,150,745.60	

⁵ The OAG does not recommend ETC designation for Windstream Services, LLC. To the OAG's knowledge, this company did not file an ETC petition with the Commission.



The Office of
Minnesota Attorney General Keith Ellison
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March 26, 2021

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

Re: *In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners*
MPUC Docket No. P-999/CI-21-86 et al.

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Kristin Berkland**

KRISTIN BERKLAND
Assistant Attorney General

(651) 757-1236 (Voice)
(651) 296-9663 (Fax)
kristin.berkland@ag.state.mn.us

CERTIFICATE OF SERVICE

Re: *In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners*
MPUC Docket No. P-999/CI-21-86 et al.

I, JUDY SIGAL, hereby certify that on the 26th day of March, 2021, I e-filed with eDockets *Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal

JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-86_Official
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.	P.O. Box 920 312 Fourth Street Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-86_Official
Patrick	Caron	N/A	Wisper-CABO 904 Consortium	210 East Earl Dr Phoenix, AZ 85012	Paper Service	No	OFF_SL_21-86_Official
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-86_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-86_Official
Joshua	Guyan	iguyan@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-86_Official
Jennifer	Richter	jrichter@akingump.com	Akin Gump Strauss Hauer & Feld LLP	2001 K St. NW Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
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Sharon	Adams	Sharon.e.adams@verizon.com	XO Communications Services, LLC	22001 Loudoun Cty Pkw Ashburn, VA 20147	Electronic Service	No	OFF_SL_21-26_M-21-26
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	OFF_SL_21-26_M-21-26
Scott	Anderson	scott.anderson@midco.com	Miccontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-26_M-21-26
Vince	Aragona	varagona@neonetworkdevelopment.com	Neo Network Development Inc.	620 N River Rd Naperville, IL 60563	Electronic Service	No	OFF_SL_21-26_M-21-26
David	Arvig	david.arvig@arvig.com	East Otter Tail Telephone Company	c/o Arvig Communication Systems 160 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-26_M-21-26
Steven	Avromov	savromov@bullseyetelecom.com	BullsEye Telecom, Inc.	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	OFF_SL_21-26_M-21-26
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Melissa	Balu	mbalu@mediacomcc.com	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way Mediacom Park, NY 10918	Electronic Service	No	OFF_SL_21-26_M-21-26
Karly	Baraga Werner	Karly_Baraga-Werner@comcast.com	Comcast Phone of Minnesota, Inc.	10 River Park Plaza St. Paul, MN 55107	Electronic Service	No	OFF_SL_21-26_M-21-26
John	Barnicle	jbarnicle@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, ste 2730 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edine	Bayne	eb4965@att.com	Teleport Communications America, LLC	225 W Randolph St, 27C350 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26
Carl	Billek, Esq.	carl.billek@idt.net	IDT America Corp.	520 Broad St Newark, NJ 07102	Electronic Service	No	OFF_SL_21-26_M-21-26
Geoff	Bloss	gbloss@bomone.com	BCM One Group Holdings, Inc.	7676 Forsyth Blvd Ste 2700 Saint Louis, MI 10017	Electronic Service	No	OFF_SL_21-26_M-21-26
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Kristina	Bourget	kbourget@wins.net	WIN, LLC	4955 Bullis Farm Road Eau Claire, WI 54701	Electronic Service	No	OFF_SL_21-26_M-21-26
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-26_M-21-26
Lance	Casey	lance.casey@consolidated.com	Consolidated Communications of Minnesota Company	221 E Hickory St PO Box 3248 Mankato, MN 56002	Electronic Service	No	OFF_SL_21-26_M-21-26
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda J	Cicco	linda.cicco@bt.com	BT Americas Inc.	11440 Commerce Park Dr Reston, VA 20191	Paper Service	No	OFF_SL_21-26_M-21-26
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-26_M-21-26
Carol	Criscuolo	cc7824@att.com	Teleport Communications America, LLC	1313 Ellison Ave Bronx, NY 10461	Electronic Service	No	OFF_SL_21-26_M-21-26
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Legal	Department	legalnotices@acninc.com	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Electronic Service	No	OFF_SL_21-26_M-21-26
Ralph	Dichy	rdichy@mettel.net	Metropolitan Telecommunications of Minnesota, Inc. dba MetTel	55 Water St FL 31 New York, NY 10041	Electronic Service	No	OFF_SL_21-26_M-21-26
Matt	Diebold	mdiebold@bigrivercom.com	Big River Telephone Company, LLC	24 S Minnesota Ave Cape Girardeau, MO 63702	Electronic Service	No	OFF_SL_21-26_M-21-26
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Keith	Nussbaum	keith@preferredlongdistance.com	Preferred Long Distance, Inc.	Suite 350 16830 Ventura Blvd. Encino, CA 91436	Electronic Service	No	OFF_SL_21-26_M-21-26
Becky	Parker	bparker@nextera.net	Nextera Communications, LLC	13850 Bluestem Ct Suite 150 Baxter, MN 56425	Electronic Service	No	OFF_SL_21-26_M-21-26
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	OFF_SL_21-26_M-21-26
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-26_M-21-26
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Vince	Rosenthal	jr2762@att.com	AT&T Services, Inc.	225 W. Randolph St. Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26
Robert	Russell	brussell@dmv.com	Local Access LLC	11442 Lake Butler Boulevard Windermere, FL 34786	Electronic Service	No	OFF_SL_21-26_M-21-26
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-26_M-21-26
Ronald A	Sheehan	Ronald.Sheehan@fusionconnect.com	Fusion Connect LLC	695 Route 46 W Ste 200 Fairfield, NJ 07004	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Sollenberger	msollenberger@firstcomm.com	First Communications, LLC	3340 W Market St Akron, OH 44333	Electronic Service	No	OFF_SL_21-26_M-21-26
Gwen	Sullivan	gsullivan@nttservices.com	Nebraska Technology & Telecommunications, Inc.	2308 S. 156th Circle Omaha, NE 68130	Electronic Service	No	OFF_SL_21-26_M-21-26
Kevin	Sullivan	Kevin.Sullivan@gtt.net	GC Pivotal, LLC	1595 Peachtree Pkwy Ste 204-337 Cumming, GA 30041	Electronic Service	No	OFF_SL_21-26_M-21-26
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	OFF_SL_21-26_M-21-26
Joseph	Topel	joe.topel.ext@orange.com	France Telecom Corporate Solutions L.L.C.	Coopermine Commons Bldg #2 13865 Sunrise Valley Dr Ste. 425 Herndon, VA 20171-6190	Electronic Service	No	OFF_SL_21-26_M-21-26
Alex	Valencia	avalencia@impacttelecom.com	Matrix Telecom, LLC	400 Las Colinas Blvd E Ste 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-26_M-21-26
Alex	Valencia	alex.valencia@lingo.com	Lingo Communications North, LLC	400 E Las Colinas Blvd Suite 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-26_M-21-26
Rebecca	West	rcui@oncommunications.com	CTC Communications Corp. d/b/a EarthLink Business	2851 Charlevoix Dr SE Ste 209 Grand Rapids, MI 49546	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-31_M-21-31
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-31_M-21-31
Joshua	Guyan	iguyan@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-31_M-21-31
Chris M.	Laughlin	claughlin@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-31_M-21-31
Eric	Pyland	epyland@team.nxlink.com	AMG Technology Investment Group, LLC	d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087	Electronic Service	No	OFF_SL_21-31_M-21-31
Generic Notice	Residential Utilities Division	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_21-31_M-21-31
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-31_M-21-31

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-32_M-21-32
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-32_M-21-32
Kara	Hartman	kara.hartman@aspirenetworks.com	Aspire Networks 2, LLC	PO Box 349 Buford, GA 30515	Electronic Service	No	OFF_SL_21-32_M-21-32
Phillip R.	Marchesiello	pmarchesiello@wbklaw.com	Wilkinson Barker Knauer, LLP	1800 M Street NW Suite 800N Washington, D.C. 20036	Electronic Service	No	OFF_SL_21-32_M-21-32
Generic Notice	Residential Utilities Division	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_21-32_M-21-32
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-32_M-21-32

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-52_M-21-52
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-52_M-21-52
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-52_M-21-52
Generic Notice	Residential Utilities Division	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_21-52_M-21-52
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-52_M-21-52
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 6th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-52_M-21-52
John	Twiest	jtwest@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)	PO Box 39 5401 W Hwy 61 Lutsen, MN 55612	Electronic Service	No	OFF_SL_21-52_M-21-52

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-53_M-21-53
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-53_M-21-53
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-53_M-21-53
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-53_M-21-53
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-53_M-21-53
Scott	Savage	ssavage@scicable.com	Savage Communications	PO Box 810 115 Tobies Mill Pl Hinkley, MN 55037	Electronic Service	No	OFF_SL_21-53_M-21-53
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-53_M-21-53
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 6th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-53_M-21-53

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-56_M-21-56
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-56_M-21-56
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-56_M-21-56
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-56_M-21-56
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_21-56_M-21-56
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-56_M-21-56
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-56_M-21-56
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 6th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-56_M-21-56

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-57_M-21-57
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-57_M-21-57
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-57_M-21-57
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-57_M-21-57
Generic Notice	Residential Utilities Division	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_21-57_M-21-57
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-57_M-21-57
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-57_M-21-57
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-57_M-21-57

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-62_M-21-62
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-62_M-21-62
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-62_M-21-62
Generic Notice	Residential Utilities Division	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_21-62_M-21-62
Mark	Roach	mark@gocctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_21-62_M-21-62
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-62_M-21-62
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-62_M-21-62
Kristi	Westbrook	Kristi@gocctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401-0972	Electronic Service	No	OFF_SL_21-62_M-21-62

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-67_M-21-67
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-67_M-21-67
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-67_M-21-67
Generic Notice	Residential Utilities Division	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_21-67_M-21-67
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-67_M-21-67
Tracey	Stoll	tstoll@roseauelectric.com	Roseau Electric Cooperative, Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_21-67_M-21-67
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-67_M-21-67

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-73_M-21-73
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-73_M-21-73
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-73_M-21-73
Generic Notice	Residential Utilities Division	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_21-73_M-21-73
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-73_M-21-73
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 6th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-73_M-21-73
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_21-73_M-21-73

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56221	Electronic Service	No	OFF_SL_21-77_AM-21-77
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_21-77_AM-21-77
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-77_AM-21-77
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-77_AM-21-77
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-77_AM-21-77
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-77_AM-21-77
Generic Notice	Residential Utilities Division	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_21-77_AM-21-77
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-77_AM-21-77
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-77_AM-21-77

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_21-81_AM-21-81
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-81_AM-21-81
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-81_AM-21-81
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-81_AM-21-81
Generic Notice	Residential Utilities Division	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_21-81_AM-21-81
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-81_AM-21-81
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-81_AM-21-81

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-83_M-21-83
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-83_M-21-83
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-83_M-21-83
Mark	Forseth	markforseth@rv.net	Halstad Telephone Company	Box 55 345 2nd Ave West Halstad, MN 56548	Electronic Service	No	OFF_SL_21-83_M-21-83
Generic Notice	Residential Utilities Division	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_21-83_M-21-83
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-83_M-21-83
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-83_M-21-83

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-84_AM-21-84
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-84_AM-21-84
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-84_AM-21-84
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-84_AM-21-84
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-84_AM-21-84
Mark	Klinkhammer	mark.klinkhammer@gvtel.net	Garden Valley Telephone Company	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-84_AM-21-84
Generic Notice	Residential Utilities Division	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_21-84_AM-21-84
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-84_AM-21-84
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-84_AM-21-84

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-92_AM-21-92
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-92_AM-21-92
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-92_AM-21-92
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-92_AM-21-92
John	Kroger	johnkroger@wctatel.com	Winnepago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	OFF_SL_21-92_AM-21-92
Generic Notice	Residential Utilities Division	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_21-92_AM-21-92
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-92_AM-21-92
Mark	Thoma	markthoma@wctatel.com	Winnepago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_21-92_AM-21-92

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-124_SA-21-124
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-124_SA-21-124
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-124_SA-21-124
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-124_SA-21-124
Gail	Gauthier	gail.gauthier@windstream.com	Windstream, Business Telecom, CTC Comm, Deltacom, EarthLink B, McLeadUSA, PAETEC, Talk America	4001 N Rodney Parham Rd Mailstop: B01 F2-12A Little Rock, AR 72212-2442	Electronic Service	No	OFF_SL_21-124_SA-21-124
Patrick J	Mastel	pat.mastel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-124_SA-21-124
Generic Notice	Residential Utilities Division	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_21-124_SA-21-124
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_21-124_SA-21-124
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-124_SA-21-124
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-124_SA-21-124

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mikaela	Burma	Mikaela.Burma@vantagepoint.com	VantagePoint	2211 N Minnesota St Mitchell, SD 57301	Electronic Service	No	OFF_SL_21-132_M-21-132
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-132_M-21-132
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-132_M-21-132
Generic Notice	Residential Utilities Division	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_21-132_M-21-132
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-132_M-21-132
Tom	Steinolfson	toms@redrivercomm.com	Red River Communications	510 Broadway Abercrombie, ND 58001	Electronic Service	No	OFF_SL_21-132_M-21-132
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-132_M-21-132

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-133_M-21-133
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-133_M-21-133
Generic Notice	Residential Utilities Division	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_21-133_M-21-133
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_21-133_M-21-133

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	OFF_SL_21-158_M-21-158
Greg	Arvig	GARVIG@NEXTERA.NET	Nextera Communications	Suite 100 7115 Forthum Rd Baxter, MN 56425	Electronic Service	No	OFF_SL_21-158_M-21-158
John	Barnicle	jbarnicle@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, ste 2730 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Kyle	Bertrand	kyle.bertrand@inteliquent.com	Onvoy, LLC	550 W Adams St Ste 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-158_M-21-158
Geoff	Bloss	gbloss@bcmone.com	BCM One Group Holdings, Inc.	7676 Forsyth Blvd Ste 2700 Saint Louis, MI 10017	Electronic Service	No	OFF_SL_21-158_M-21-158
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-158_M-21-158
Jenna	Brown	jbrown@voomsolutions.com	QuantumShift Communications, Inc	12657 Alcosta Blvd Ste 418 San Ramon, CA 94583	Electronic Service	No	OFF_SL_21-158_M-21-158
Gary	Case	gary.case@verizon.com	Verizon	600 Hidden Ridge Irving, TX 75038	Electronic Service	No	OFF_SL_21-158_M-21-158
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-158_M-21-158
Shira	Cook	shira.cook@zayo.com	Zayo Group, LLC	1805 29th St Ste 2050 Boulder, CO 80301	Electronic Service	No	OFF_SL_21-158_M-21-158
Corbin	Coombs	cc2862@att.com	AT&T Corp.	225 West Randolph Street Z2 Room 17A140 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Heather	Dobson	heather.dobson@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Dr St Louis, MO 63131	Electronic Service	No	OFF_SL_21-158_M-21-158
Andoni	Economou	aeconomou@mettel.net	Metropolitan Telecommunications of Minnesota, Inc.	55 Water St FL 31 New York, NY 10041	Electronic Service	No	OFF_SL_21-158_M-21-158
Carey	Gagnon	carey.gagnon@verizon.com	Verizon	3131 S Vaughn Way 5th Floor Aurora, CO 80014	Electronic Service	No	OFF_SL_21-158_M-21-158
John	Harrington	jharrington@inteliquent.com	Neutral Tandem-Minnesota	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Joe	Hartman	joe.hartman@acninc.com	ACN Communications Services, Inc.	1000 Progress Pl NE Concord, NC 28025	Electronic Service	No	OFF_SL_21-158_M-21-158
Stacey	Hines	stacey.hines@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Drive St. Louis, Missouri 63131	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ruth	Holder	ruth.holder@bt.com	BT Communications Sales LLC	11440 Commerce Park Dr Reston, VA 20191	Electronic Service	No	OFF_SL_21-158_M-21-158
Julian	Jacquez	jjacquez@bcntele.com	BCN Telecom, Inc.	1200 Mt. Kemble Ave. 3rd Fl. Harding Township, NJ 07960	Electronic Service	No	OFF_SL_21-158_M-21-158
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_21-158_M-21-158
Jim	Lundberg	jl@velocitytelephone.com	Velocity Telephone Inc	656 Mendelssohn Ave N Golden Valley, MN 55427	Electronic Service	No	OFF_SL_21-158_M-21-158
Laurie	McDonough	laurie.mcdonough@acninc.com	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Electronic Service	No	OFF_SL_21-158_M-21-158
Sadia	Mendez	smendez@bcmone.com	BCM One, Inc.	521 5th Ave FL 14 New York, NY 10175	Electronic Service	No	OFF_SL_21-158_M-21-158
Stephen	Meradith	WCI.Minnesota.govaffairs@windstream.com	McLeod USA Telecommunications Services, LLC	Windstream Communications 4001 Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_21-158_M-21-158
Richard	Monto	rmonto@inteliquent.com	Neutral Tandem-Minnesota, LLC	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Bruce A	Ney	bruce.ney@att.com	AT&T Services, Inc.	816 Congress Ave Ste 1100 Austin, TX 78701	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Osborne	dosborne@localaccessllc.com	Local Access LLC	11442 Lake Butler Blvd Windermere, FL 34786	Electronic Service	No	OFF_SL_21-158_M-21-158
Jack D.	Phillips	jack.phillips@tr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_21-158_M-21-158
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-158_M-21-158
Robert	Russell	brussell@dmv.com	Local Access LLC	11442 Lake Butler Boulevard Windermere, FL 34786	Electronic Service	No	OFF_SL_21-158_M-21-158
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-158_M-21-158
Lisa	Sichler	lsichler@bullseyetelecom.com	Bullseye Telecom	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	OFF_SL_21-158_M-21-158
Jason	Topp	jason.topp@lumen.com	Centurylink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-158_M-21-158
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-158_M-21-158
Alex	Valencia	avalencia@impacttelecom.com	Matrix Telecom, LLC	400 Las Colinas Blvd E Ste 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-158_M-21-158
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-158_M-21-158
Brian	Witte	bw8912@att.com	Teleport Communications America, LLC	C/O Global Connects / AT&T Corp. One AT&A Way Rm 4A252B Bedminster, NJ 07921	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Caron	Patrick.Caron@cableone.biz	Cable One, Inc.	210 E Earll Dr Phoenix, AZ 85012	Electronic Service	No	OFF_SL_21-161_M-21-161
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-161_M-21-161
Angela	Collins	acollins@cahill.com	Ionex Communications North, Inc. dba Birch Communications	1990 K St NW Ste 950 Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-161_M-21-161
Cherie R.	Kiser	ckiser@cgrdc.com	Cahill Gordon & Reindel LLP	1990 K St NW Ste 950 Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_21-161_M-21-161
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-161_M-21-161

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tracy	Bandemer	Tracy.Bandemer@itccoop.com	Interstate Telecommunications Cooperative, Inc..	312 4th St W PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-180_M-21-180
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-180_M-21-180
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-180_M-21-180
John	Kuykendall	jkuykendall@jsitel.com	JSI on behalf of Interstate Telecommunications Cooperative, Inc.	7852 Walker Dr Ste 200 Greenbelt, MD 20770	Electronic Service	No	OFF_SL_21-180_M-21-180
Generic Notice	Residential Utilities Division	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_21-180_M-21-180
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-180_M-21-180