

**Minnesota Public Utilities Commission**  
*Staff Briefing Papers*

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Meeting Date: September 17, 2015 ..... \*\*Agenda Item # 1

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Company: Local Exchange Companies, Eligible Telecommunications Carriers

Docket Nos. P999/PR-15-8  
In the Matter of Annual Certifications related to Eligible Telecommunications Carriers' (ETCs) Use of the Federal Universal Service Support required pursuant to C.F.R. §54.313

Issue: Should the Commission approve all petitioning ETCs' requests for high cost support certification?

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***Relevant Documents***

PUC ORDER SETTING FILING REQUIREMENTS (05-741)..... July 21, 2005  
PUC ORDER MODIFYING ANNUAL CERTIFICATION SCHEDULE (14-8) ... April 11, 2014  
Filings for High-Cost Certifications, 15-8 (as summarized in the Attachment).....  
..... March 4 through July 20, 2015  
DOC Request for Time Extension ..... August 31, 2015  
DOC Comments ..... September 4, 2015  
DOC Supplemental Comments (Attachments 1, 2 and 3), Appendix A, and  
Addenda 1, 2, and 3 to Appendix B) ..... September 8, 2015  
DOC Revised Attachment 1 ..... September 9, 2015  
Dunnell Reply Comments ..... September 10, 2015

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### ***Statement of Issues***

Should the Commission approve all petitioning Eligible Telecommunications Carriers' (ETCs') requests for high cost support certification?

### ***Background***

The state commissions have the primary responsibility for designating ETCs as provided under 47 U.S.C. §214(3)(2) of the Telecommunications Act. Only designated ETCs are qualified to receive subsidies from the federal universal service funds (e.g. High-Cost Support and Low-Income or Lifeline), and from any state universal service funds. In numerous cases since 1997, the Minnesota Public Utilities Commission (Commission) had designated all incumbent local exchange companies, some competitive LECs and some wireless telephone service providers as Minnesota ETCs.

On May 23, 2001, the Federal Communications Commission (FCC) released an Order which, among others, concluded that states should file annual certifications with the FCC to ensure that all ETCs use High-Cost universal service support "only for the provision, maintenance and upgrading of facilities and services for which the support is intended" consistent with section 254(e) of the Telecommunications Act of 1996.<sup>1</sup> The Commission approved a set of requirements for certifying ETC's use of federal High Cost support that included the filing of affidavits, and submission of operating and capital investment documentation; the mechanics of which were cited by the Joint Board on Universal Service as an example of what other states can follow.<sup>2</sup>

On March 17, 2005, the FCC issued an Order mandating the requirements for the ETCs' annual certifications.<sup>3</sup> The Commission later adopted, with modifications, all the requirements contained in the FCC Order. On July 21, 2005, the Commission issued an Order incorporating, with modifications, the certification requirements directed by the FCC in Docket 96-45, FCC 05-45.<sup>4</sup>

In November 2011, the FCC issued its New USF Order (also called CAF/ICC Order, FCC 11-161, Report and Order and Further Notice of Proposed Rulemaking in WC Docket No. 10-90 et al). The USF Order provided for significant reforms, including a thorough review of the annual

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

<sup>2</sup> *Recommended Decision, Federal-State Joint Board on Universal Service, FCC 04J-1, CC Docket No. 96-45*, issued on February 27, 2004.

<sup>3</sup> *Report and Order in the Matter of the Federal-State Joint Board on Universal Service*, issued on March 17, 2005.

<sup>4</sup> *Order Setting Filing Requirements and Opening Proceeding to Consider Adopting FCC Standards for Designating Eligible Telecommunications Carriers, Docket No. P999/M-05-741, In The Matter Of Possible Changes To The Commission's Annual Certification Requirements Related To Eligible Telecommunications Carriers' (ETCs) Use Of The Federal Universal Service Fund* issued on July 21, 2005.

reporting requirements from ETCs and required a national standardized reporting framework pursuant to C.F.R. §54.313.

The USF Order directed all ETCs to file with the FCC and the respective state commissions by April 1 of each year. The deadline was later moved to July 1 of each year.<sup>5</sup> The FCC also clarified that the USF Order did not intend to change state reporting requirements as long as they do not create burdens. The Wireline Competition Bureau pursuant to delegated authority, also waived and clarified certain §54.313 requirements, and required carriers to use FCC Form 481 in filing annual ETC certifications.<sup>6</sup>

### ***Procedural History***

On April 11, 2014, the Commission modified the schedule for 2014 and future annual certifications as follows<sup>7</sup>:

ETC's Petitions for Certification:	July 1
Initial Comment Period:	September 1
Reply Comment Period:	September 8

From March 1 through July 20, 2015, ETCs filed their Form 481s to comply with the Commission and FCC requirements. The ETCs also request the Commission to provide the annual certification to the FCC pursuant to 47 C.F. R. §54.314 by October 1, 2015 in order for the companies to receive its federal High Cost support in Minnesota.

At the request of the Department of Commerce (DOC, Commerce), the Commission extended the deadlines for Comments and Reply Comments to September 4 and September 10, respectively.

On September 4, 2015, the Department of Commerce (Commerce) filed its Comments.

On September 10, 2015, Dunnell filed Reply Comments.

### ***The Department's Comments***

The Department cites pertinent laws affecting ETCs' annual certification and requirements, notably 47 C.F.R §54.313 and 47 C.F.R. §54.314. The Department's Appendix A replicates the entire provisions of 47 C.F.R §54.313.

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<sup>5</sup> FCC's Third Order on Reconsideration, FCC 12-52 released on May 14, 2012.

<sup>6</sup> FCC's Public Notice DA 13-1707, WC Docket Nos. 10-90 and 11-42, released on August 6, 2013.

<sup>7</sup> Order Revising Schedule for Annual Certifications, dated April 11, 2014, *In the Matter of Annual Certifications Related to Eligible Telecommunications Carriers' Use of Federal Universal Service Support*, Docket P999/PR-14-8.

The Department's analysis on pages 4 through 9 shows how the petitioners have addressed the current applicable requirements. The Department believes that all the petitioning carriers as listed in Attachment 1, with the exception of Dunnell Telephone Company (Dunnell), have generally provided adequate information and a sufficient level of detail as to how high cost funds have been used, to fulfill the requirements implemented by the FCC in the CAF-ICC and subsequent orders.

With respect to Dunnell, the Department expressed concerns regarding Dunnell's compliance with the certification requirements pursuant to 47 C.F.R §54.313. Appendix B is devoted to a review of Dunnell's financial information.

**TRADE SECRET INFORMATION** provided by the Department on pages 8 and 9 of their Comments, and Response to Information Request #8 in Attachment 3 relates to Dunnell's deficiency on meeting the financial report requirement under section 54.313(f)(2).

Similarly, **TRADE SECRET INFORMATION** contained in Appendix B of the Department's Comments highlights more concerns about Dunnell's use of high cost support in the coming year only for the intended purposes. The Department notes the projected changes in the level of planned investments as well as in the operating expenses for the coming years, as well as the Company's explanation about the status of the accounting records resulting from the Company's acquisition by a Texas limited liability company midyear 2014.

Appendix B contains 3 addenda that explain why the Department questions the reasonableness and/or reliability of the information filed in this docket by Dunnell. Addendum 1 shows the high cost funds received in January through June 2015 by comparably-regulated ETCs, indicating the high ratio of support per loop for Dunnell. Addendum 2 shows Dunnell on top of the list of rate-of-return ETCs with the highest high cost support per loop received for the first half of 2015. It also shows the high ratio of Dunnell's a) Plant, b) Corporate and c) Total Operating Expenditures for 2014 to the number of loops, showing the very high expenditure ratios per loop in each case and the very low Plant Expenditures/Total Operating Expenditures for Dunnell compared with other ETCs. Addendum 3 shows that Dunnell's financial statement shown on its Form 481 filing on July 1, 2015, (See Section 3005 at the very last page of the Attachments to Dunnell's Trade Secret filing in this docket) is not reflective of the costs submitted to NECA or National Exchange Carrier Association, a membership association of local telecom companies for purposes of calculating high cost loop support.

The Department believes, however, that if Dunnell can provide additional substantive explanations to the 6 points enumerated on pages 3 and 4 of Appendix B, the Commission may reasonably include Dunnell in the Commission's certification to the FCC and USAC.

The Department, despite expressed concerns about Dunnell's filings, has included Dunnell on its Attachment 1 list for ETC certification. If Dunnell files sufficient information responsive to the

6 questions raised before the Commission hearing scheduled on September 17, the Department recommends that the Commission certify that all petitioning ETCs including Dunnell has used and will use high cost funds appropriately.

Due to the late filing date, the Department has not gotten a chance to evaluate and comment on Dunnell's reply.

### ***Dunnell's Reply***

On September 10, Dunnell filed Reply Comments, which mostly contained Trade Secret Information.

The Trade Secret version contained Dunnell's explanation of why it was it was not able to file audited financial statements and why the Form 481 filing made on July 1 contained errors that are now being addressed and will be corrected once the financial review by the retained CPA is completed. Dunnell also provided answers to the Department's 6 questions.

In short, the acquisition of Dunnell by KCL Enterprises, LLC in July 2014, which was approved by the Commission in Docket 14-511<sup>8</sup> saved the Company from financial distress. The new owner has since uncovered a number of issues, including the dispute with Zayo Group, LLC which was filed before the Commission in Docket No. 15-138.<sup>9</sup> Dunnell states that it has taken more time than expected to reconstruct the financial and other records of the Company. On page 7, in response to the Department's Inquiry No. 4, Dunnell described its service improvement plan for 2015 and 2016 and says that it anticipates updating the report later. Dunnell regrets the errors contained in its filing, explains that the circumstances are beyond its control, and commits to submit a corrected filing in the future. Dunnell says there is no evidence of misuse of universal service funds and asks the Commission the same benefit of doubt that other small, rural carriers in Minnesota receive.

Not getting the Commission certification at this time would cause the Company irreparable harm and strand its customers. Dunnell requests some latitude from the Commission.

### ***Staff Analysis***

#### **Filings consistent with Section 54.313 requirements**

The High Cost Program of the USF was created to enable consumers in all regions of the country to have access to and pay rates for telecommunications services that are reasonably comparable to those available in the urban areas. The High Cost Program is being transitioned to Connect

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<sup>8</sup> *In the Matter of the Joint Petition of Dunnell Telephone Company, Inc. and KCL Enterprises, LLC for Approval of Stock Transfer*, Docket No. P517/PA-14-511, ORDER dated July 11, 2014.

<sup>9</sup> *In the Matter of Zayo Group's Request to Discontinue telecommunications service to Dunnell Telephone Company*, Docket No. 6854/M-15-138. The case was pulled from the Commission's June 25, 2014 agenda at the request of the parties to allow them more time for settlement discussions. On page 7 of the Trade Secret version of Dunnell's Reply, the Company described the resolution of that dispute.

America Fund pursuant to the FCC's USF/ICC Transformation Order<sup>10</sup> reforming the program and expanding support for broadband. Funding of USF, through revenue-based assessments on interstate and international telecommunications revenues, is generally passed on by the carriers to the end-users. The Universal Service Administrative Company, or USAC, administers the Federal USF and compiles data on high cost support disbursed to each ETC in the state.

47 C.F.R. §54.313 details the updated reporting requirements for High-Cost ETCs. The required data gathered through a template called FCC Form 481 include those for service improvement plans, financial statements, outages, unfulfilled service requests, complaints, price offerings, company affiliations and brands, financial reports and a number of certifications summarized in the following table:

<b>481 Section/ Issue</b>	<b>CFR section and Order</b>	<b>Specific requirements</b>
Section 100 – 5-yr. improvement plans/updates	54.313(a)(1) DA 13-332	RoR ETCs should file a progress report on the 5-year service improvement plan. With respect to the July 1, 2015 filing, USAC has clarified the plan should include 2015 up to the filing date. CETCs do not have to file new 5-yr plans.
Section 200- Outages	54.313(a)(2) DA 13-332, footnote 46	File voice (but not broadband) outages for 2014.
Section 300 – Unfulfilled requests for service	54.313(a)(3)	File unfulfilled voice and broadband requests for 2014.
Section 400 – Complaints	54.313(a)(4)	File complaints for 2014.
Section 500 – Quality and consumer protection	54.313(a)(5)	Certify compliance with certain service standards and consumer protection rules
Section 600 – Emergency certification	54.313(a)(6)	Certify that ETC is able to function in emergency situations.
Section 700	54.313(a)(7)	Report ETC's price offerings as of Jan. 1, 2015
Section 800 – Affiliates and DBAs	54.313(a)(8)	List ETC's holding companies, affiliates, and any branding and universal service identifiers for each entity by study area codes.

<sup>10</sup> FCC Report and Order and Further Notice of Proposed Rulemaking, released on November 18, 2011, FCC 11-161. In the Matter of Connect America Fund, WC Docket No. 10-90, High Cost Universal Service Support, WC Docket No. 05-337, et al.

Section 900 – Tribal engagement	54.313(a)(9)	Demonstrate that ETC has ongoing engagement with tribal governments to the extent it serves tribal lands by completing the tribal engagement worksheet.
Section 1000 – Comparable voice rates	54.313(a)(10)	Certify that rates are reasonably comparable and are no more than 2 standard deviations above the applicable national average urban rate.
Section 1100 – Satellite backhaul	54.313(g)	ETCs compelled to rely exclusively on satellite backhaul to certify that no terrestrial backhaul options exist and that they are offering 1Mbps/256 kbps broadband service within that area.
Section 2005 – Incremental support	54.313(b)(1)(i)	Price cap carriers receiving incremental support must certify that they have deployed broadband service to no fewer than 2/3 of the required locations.
Section 2005 – Frozen support	54.313(c)(3)	Price cap carriers that received frozen support must certify that 2/3 of frozen support received in 2014 was used to offer broadband in areas substantially unserved by an unsubsidized competitor.
Section 2005 – ICC support	54.313(c)(3)	Price cap carriers that received ICC support pursuant to section 54.304 in 2014 must certify that support was used to build and operate broadband-capable networks used to offer own retail service in areas substantially unserved by an unsubsidized competitor.
Section 3005 – Milestone certification	54.313(f)(1)(i)	RoR ETCs must certify that they reasonably addressed requests for broadband service at required speeds and within reasonable time.
Section 3005 – Community anchor institutions	54.313(f)(1)(ii)	RoR ETCs must provide the number, names, and addresses of community anchor institutions to which the ETC began offering broadband service in 2014.
Section 3005 – Privately held RoR financials	54.313(f)(2)	Privately held RoR ETCs must file financial statements.
Section 700	54.313(h)	ILECs to update rates for residential local service and state fees, to the extent that these rates are below the rate floor as defined in 54.328.

Staff worked with industry representatives and with DOC, FCC and USAC about the requirements and procedures related to the annual certifications. Over the years, the requirements have evolved with the reporting now standardized with the use of Form 481.

Staff has reviewed the Form 481 reports filed by the petitioners and believe each ETC, **with the exception of Dunnell**, satisfies the annual reporting requirements for high cost support pursuant to 47 C.F.R. §54.313.

### **Certification for Dunnell**

The remaining issue is whether to include or not to include Dunnell in the Commission certification to the FCC and USAC. Dunnell's explanation of the reasons for the deficiencies in its filings are contained in the Trade Secret version of the Company's Reply received on September 10.

The Commission has an important role in safeguarding the integrity of the universal service program, including making sure that each ETC being certified provided accurate and complete information by which to ascertain whether the support funds are used and will be used only for the intended purposes.

The record in this case indicates that Dunnell's annual report is not complete and fully defensible at this time. The Company, however, is showing a good faith effort to come into compliance and believes that high cost funds have and will be used for intended purposes.

If the Commission certifies Dunnell today and allows it to receive the high cost support for 2016, Staff is not aware of any process by which to decertify the Company to stop 2016 high cost payments in the event Dunnell fails to deliver full compliance. The Commission could certainly deny subsequent years' certification for the Company.

If the Commission does not certify Dunnell now, then the Company will not be eligible to receive high cost support for 2016. The amount of high cost support received by the Company in 2015 and projects to receive in 2016 is significant. According to Dunnell, the loss of the support will devastate the Company.

The Commission may wish to defer certification depending on when it receives Dunnell's full compliance of the requirements. The FCC rules provide for some delays in the certification, but with financial consequences for the ETC. According to section 54.314(d), if the Commission certification is filed on or before October 1, Dunnell will receive support in the first, second, third and fourth quarters of the succeeding year. If the certification is filed by January 1 of the subsequent year, Dunnell will only receive support in the second, third, and fourth quarters of that year. If certification is filed by April 1 of the subsequent year, Dunnell will only receive support in the third and fourth quarters. If certification is filed by July 1 of the subsequent year, Dunnell will only receive support beginning in the fourth quarter of that year. If the Commission defers certification, it may want to direct a time schedule for Dunnell to follow to allow the Department and Staff adequate time to review the filings. In such a case, the Commission may want to delegate authority to the Executive Secretary to certify Dunnell upon favorable recommendation by the Department and Staff.



Staff suggests the following schedule if Dunnell's certification is deferred by the Commission:

For Commission certification on or before	Dunnell filing date on or before
January 1, 2016	December 16, 2015
April 1, 2016	March 18, 2016
July 1, 2016	May 18, 2016

The Commission may want to hear the Department's position relative to Dunnell's September 10 filing. The Commission would want a justifiable basis for certifying that Dunnell will use the funds for 2016 in an appropriate manner for the provision, maintenance and upgrade of facilities for which the support is intended consistent with section 254 of the Telecommunications Act.

### **Form 481 filings by Lifeline only carriers**

Lifeline only carriers also filed Form 481 certifications to the Commission as required under section 54.313. These carriers are listed on the Department's Attachment 2.

Staff has reviewed the filings and believes that no Commission action is necessary on the Lifeline-only filings at this time. There is no present requirement that state commissions need to certify carriers receiving Lifeline only support. This Commission has been vigilant that ETCs follow state and federal rules governing ETCs. Any found deficiencies in providing Lifeline service can be addressed by the Commission in separate future cases for revocation or relinquishment of ETC status, as provided under state rules.

### **State Certification pursuant to Section 54.314**

47 C.F.R. §54.314 provides that States that desire eligible ETCs to receive support pursuant to high-cost program must file an annual certification with USAC and the FCC stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to this section. The filing due date is October 1 of each year.

Starting in 2014, USAC has encouraged the use of online eFiling to submit the §54.314 certification. The online process requires states to check boxes corresponding to individual service area codes (SACs) for each carrier being certified. USAC's online system provides the certification letter that the Commission can use to file with the FCC.

The Attachment lists the petitioning ETCs, including Dunnell, for Commission certification to the FCC and USAC that the listed ETCs have used high cost support received in 2014, and will be used in 2016 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The list will be revised in accordance with the Commission's decision affecting Dunnell as discussed below.

**Commission Options:**

## A. With respect to all petitioning ETCs except Dunnell:

1. Certify that all the petitioning ETCs, except Dunnell, have used High-Cost Support received in 2014, and will use High-Cost Support received in the coming calendar year 2016 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
2. Other action determined by the Commission.

## B. With respect to Dunnell:

1. Certify that Dunnell had used High-Cost Support received in 2014, and will use High-Cost Support received in the coming calendar year 2016 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
2. Do not certify Dunnell at this time.
3. Defer certification for Dunnell until such time that Dunnell comes to full compliance. Direct Dunnell to follow the following schedule for future filing:

For Commission certification on or before	Dunnell filing date on or before
January 1, 2016	December 16, 2015
April 1, 2016	March 18, 2016
July 1, 2016	May 18, 2016

Also, delegate authority to the Executive Secretary to certify Dunnell upon review of the filing by the Department and Staff.

4. Other action determined by the Commission.

**Staff Recommendations**

Staff recommends Option A.1. Staff has no recommendation on B.

## Attachment – List of MN ETCs Certified for High-Cost Support, MNPUC Docket 15-8

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	ETC Seeking High-Cost Certification	Study Area Code/s
1	Ace Telephone Assn	361346
2	Albany Mutual	361347
3	Alliance Comm Coop (incl. Hills Tel Co)	361405, 391405, 391657
4	Arrowhead Comm Corp	361374
5	Arvig Tel Co dba TDS	361350
6	Benton Coop Tel Co	361356
7	Blue Earth Valley	361358
8	Bridge Water Tel Co dba TDS	361362
9	Callaway Tel Co	361365
10	Cannon Valley Telecom	361440
11	CenturyTel of Chester dba CenturyLink	351126
12	CenturyTel Minnesota dba CenturyLink	361445
13	CenturyTel of NW Wisconsin dba CenturyLink	330950
14	Christensen Communications	361425
15	Citizens-Frontier-MN	367123, 361123
16	City of Barnesville	361353
17	Clara City Tel Exch	361370
18	Clements Tel Co	361372
19	Consolidated Tel Co	361373
20	Crosslake Tel Co	361499
<sup>1</sup> 21	<b>Dunnell Tel Co</b>	<b>361381</b>
22	Eagle Valley Tel Co	361383
23	East Otter Tail Tel	361385
24	Easton Tel Co	361384
25	Eckles Tel Co	361386
26	Embarq Minnesota dba CenturyLink	361456
27	Emily Coop Tel Co	361387
28	Farmers Mutual Tel	361389, 369020
29	Federated Tel Coop (incl. fka Fed Utilities)	363190, 361403, 369021
30	Felton Tel Co. Inc.	361391

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<sup>1</sup> Inclusion dependent on Commission decision.

## Attachment – List of MN ETCs Certified for High-Cost Support, MNPUC Docket 15-8

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31	Frontier-Minnesota	361367
32	Garden Valley Tel Co	361395
33	Gardonville Coop Tel	361396
34	Granada Tel Co	361399
35	Halstad Telephone Company	361401
36	Harmony Tel Co	361404
37	Home Tel Co -MN	361408
38	Hutchinson Tel Co	361409
39	Interstate Telecom Coop	361654
40	Johnson Tel Co	361410
41	Kasson & Mantorville	361412
42	Lismore Coop Tel Co	361419
43	Lonsdale Tel Co	361422
44	Loretel Systems, Inc.	361443
45	Mabel Coop Tel-MN	361424
46	Manchester-Hartland Tel Co	361426
47	Mankato - HickoryTech	361427
48	Melrose Tel Co	361430
49	Mid-Communications - HickoryTech	361375
50	Mid State Tel Co (incl.fka KMP) dba TDS	361433, 361413
51	Midwest Tel Co	361431
52	Minnesota Valley Tel	361439
53	New Ulm Telecom, Inc	361442
54	Northern Tel Co - MN	361500
55	Osakis Tel Co	361448
56	Park Region Mutual	361450
57	Paul Bunyan Rural	361451
58	Peoples Tel Co - MN	361453
59	Pine Island Tel Co	361454
60	Polar Comm Mut Aid	381630, 381614
61	Qwest dba CenturyLink	365142
62	Red River Rural Telephone Assoc.	381631
63	Redwood County Tel	361472
64	Rothsay Tel Co, Inc	361474

## Attachment – List of MN ETCs Certified for High-Cost Support, MNPUC Docket 15-8

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65	Runestone Tel Assn	361423, 361475
66	Sacred Heart Tel Co	361476
67	Scott Rice - Integra	361479
68	Sleepy Eye Tel Co	361483
69	Spring Grove Coop	361485
70	Starbuck Tel Co	361487
71	T-Mobile Central LLC	369014
72	Twin Valley-Ulen Tel	361491
73	Upsala Coop Tel Assn	361494
74	Valley Tel Co - MN	361495
75	West Central Tel	361501
76	Western Tel Co	361502
77	Wikstrom Tel Co., Inc.	361505
78	Wilderness Valley	361348
79	Windstream Lakedale, Inc.	361482, 361414
80	Winnebago Coop Assn	361337
81	Winsted Tel Co dba TDS	361507
82	Winthrop Tel Co	361508
83	Wolverton Tel Co	361512
84	Woodstock Tel Co	361510
85	Zumbrota Tel Co	361515