

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

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

**In the Matter of the Petition of Windstream MPUC Docket No.: _____
Communications, LLC for Designation as
Eligible Telecommunications Carrier**

ORIGINAL FILING

Windstream Communications, LLC, (“WC” or the “Company”) requests the Minnesota Public Utilities Commission (“Commission”) approve its request for designation as an Eligible Telecommunications Carrier (“ETC”) for specific areas awarded to WC in the Federal Communications Commission (“FCC”) Rural Digital Opportunity Fund Auction (“RDOF Auction”) in areas outside of its affiliate’s incumbent service territory.

The filing includes the following attachments:

Attachment 1	One paragraph summary of the filing in accordance with Minn. Rules pt. 7829.1300.
Attachment 2	Petition to designate WC’s RDOF service area as an Eligible Telecommunications Carrier.
Attachment 3	Certificate of Service

In addition, the following information is provided in accordance with Minn. Rules pt. 7829.1300, subp. 3:

Utility:	Windstream Communications, LLC 4001 North Rodney Parham Road Little Rock, AR 72212
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Date of Filing	April 6, 2021
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Controlling Statute Time
In Processing Filing: Minn. Rules pt. 7811.1400, subp. 12

If additional information is required, please contact me at 501-748-6313.

/s/ Nicole Winters
Nicole Winters
Counsel II
Windstream Communications, LLC

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In the Matter of the Petition of Windstream Communications, LLC for Designation as Eligible Telecommunications Carrier **MPUC Docket No.:** _____

SUMMARY OF FILING

Windstream Communications, LLC’s (“WC” or the “Company”) parent company, Windstream Services, LLC (“Windstream Services”) was named a winning bidder for certain census blocks in the State of Minnesota under the FCC’s RDOF Phase 1 Auction.¹ Under RDOF rules, Windstream Services is allowed to assign its winning bids to its affiliates in Minnesota.² Windstream Services’ winning bids cover areas within its incumbent affiliate Windstream Lakedale, Inc.’s territory and areas outside of the incumbent’s service area. For the areas within the incumbent’s territory, Windstream Lakedale, Inc. already holds the necessary Eligible Telecommunications Carrier (“ETC”) designation. For the areas outside of Windstream Lakedale, Inc.’s territory, WC will be responsible for RDOF deployment and compliance. These areas are more specifically defined in **Exhibit A**. WC is not currently designated as an ETC in Minnesota and WC respectfully requests the Commission to grant it petition for designation as an ETC in the areas defined in the Petition.

¹ *Rural Digital Opportunity Fund Phase 1 Auction (Auction 904) Closes, Winning Bidders Announced*, Public Notice, DA No. 20-1422 (OEA/WCB rel. Dec. 7, 2020) (“*Auction 904 Results Notice*”). See, <https://docs.fcc.gov/public/attachments/DA-20-1422A1.pdf>

² See *Rural Digital Opportunity Fund Phase 1 Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, Public Notice, FCC 20-77, 35 FCC Rcd 686 (June 11, 2020) (“*Auction 904 Procedures Public Notice*”), at ¶ 43.

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In the Matter of the Petition of Windstream Communications, LLC for Designation as Eligible Telecommunications Carrier **MPUC Docket No.:** _____

**PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

Windstream Communications, LLC (“WC” or “Company”) requests the Minnesota Public Utilities Commission (the “Commission”) approve its request for designation as an Eligible Telecommunications Carrier (“ETC”) covering 20 census block groups in 253 eligible census blocks located in Anoka, Chisago, Hennepin, Isanti and Sherburne Counties (collectively, the “Census Block Groups” and each, individually, a “Census Block Group”) identified in **Exhibit A**. This petition is submitted pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),³ Sections 54.201 and 54.202 of the Federal Communications Commission (“FCC”) rules,⁴ and the Orders of this Commission. WC’s request for ETC designation relates to certain Minnesota areas covered by the FCC’s Rural Digital Opportunity Fund Phase I Action (Auction 904) (the “RDOF Auction”).

³ 47 U.S.C. § 214(e)(2)

⁴ 47 C.F.R. §§ 54.201 and 54.202.

WC further respectfully requests that the Commission issue an order designating WC as an ETC in the state of Minnesota on or before June 7, 2021, pursuant to the Act⁵ and FCC rules and the Orders of this Commission, or order any other relief on a timely basis as may be appropriate. In support of this Petition, WC states as follows:

I. Company Overview

WC is a Delaware limited liability company with a place of business at 4001 North Rodney Parham Road, Little Rock, Arkansas 72212. WC is authorized by the Commission to provide interexchange telecommunications services in Minnesota.⁶ WC is authorized to do business in Minnesota, and copies of its registration as a company doing business in Minnesota are on file with Secretary of State.

Petitioner WC is a wholly owned subsidiary of Windstream Holdings II, LLC (hereinafter, “Windstream”) and Windstream Services, LLC (hereinafter, “Windstream Services”), both Delaware limited liability companies also headquartered at the same address as WC. Windstream, through its subsidiaries, is a leading provider of advanced network communications and technology solutions for consumers, small businesses, enterprise organizations and carrier partners across the U.S. Windstream provides voice and data services that enhance the communication capabilities of consumers and businesses throughout Minnesota. Windstream’s consumer and small business segment includes approximately 1.4 million residential and small business customers that receive voice, broadband, entertainment, and security solutions. Windstream’s enterprise business segment offers services such as software-defined wide area networking (“SD-WAN”) and unified communications as a service (“UcaaS”) to businesses across the U.S.

⁵ 47 U.S.C. § 214(e)(2)

⁶ See Commission Docket No. P-6518/NA-05-1990, January 25, 2006.

Windstream does not provide telecommunications services in its own right. Rather, it owns and operates a number of licensed telecommunications providers in all states and the District of Columbia, many of which also hold authority from the FCC to provide domestic interstate and international telecommunications services.

WC has operated as an interexchange provider in the state for almost 15 years.⁷ WC's incumbent affiliate Windstream Lakedale, Inc. has operated in Minnesota for 75 years. Combined, WC and its other CLEC and ILEC affiliates have provided telecommunications services for over 100 years. WC is managed by the same company officers and management team that oversees its affiliates. WC's affiliates also have successfully participated in federal broadband programs such as the Connecting America Fund (both phases) and the Rural Utilities Service program. In addition, WC's affiliates have previously participated in and will continue to participate in state broadband expansion programs. As a result, WC has the necessary experience to implement and execute the requirements both under the RDOF program, as well as federal and state ETC obligations.

II. Rural Digital Opportunity Fund Participation

On December 7, 2020, the FCC announced that Windstream Services, was a winning bidder in Auction 904 for census block groups in 18 states, including Minnesota.⁸ As a condition of receiving funding, WC must obtain from either the relevant state commission, or from the FCC where such state commission lacks jurisdiction, ETC designation to cover its winning bid areas by June 7, 2021.⁹ WC is in the process of seeking designation as an ETC in each of the 18 states in which it was selected as a winning bidder and specifically seeks such designation from Minnesota

⁷ See Commission Docket No. P-6518/NA-05-1990.

⁸ *RDOF Winning Bidder PN*, Attach. A at pp. 8-9.

⁹ *RDOF Winning Bidder PN* at ¶ 36. The FCC “will presume that an entity acted in good faith if the entity files its ETC application within 30 days of the release of” the RDOF Winning Bidder PN. *Id.* at ¶ 37.

for the 20 eligible census block groups in the state for which it has been announced as a winning bidder in Auction 904.¹⁰

Windstream is committed to closing the digital broadband divide in the United States by working to provide greater access to voice and broadband services in unserved, rural, and or high-cost areas. Being awarded over \$523 million in RDOF funding across 18 states, Windstream plans to bring fiber-to-the-home to nearly 200,000 locations.

A. Winning Bids Assigned to WC

Per the FCC's procedures for the RDOF Auction, winning bidders could divide and/or wholly assign their bids to affiliated operating companies.¹¹ Windstream Services assigned its winning RDOF Auction bids for the Census Block Groups to WC, an approved long distance provider in Minnesota.¹² As assignee of the Minnesota bids, WC must satisfy certain public interest requirements, including eventual designation as an ETC for the respective RDOF Census Block Groups originally awarded to Windstream Services. By assignment, WC, has been selected to receive \$6,533,570 over a ten-year period (\$653,357 annually) to provide services to 20 census block groups in Minnesota. The census blocks and census block groups associated with WC's winning bids are identified in **Exhibit A**, as well as a map illustrating the RDOF census blocks.

B. Communications and Correspondence

The legal name, address and telephone number of WC is as follows:

Windstream Communications, LLC
4001 North Rodney Parham Road
Little Rock, AR 72212
(501) 748-7000

¹⁰ See Exhibit A for the identified census block groups in Minnesota, along with a map of the same.

¹¹ See *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, Public Notice, FCC 20-77, 35 FCC Rcd 686 (June 11, 2020) ("*Auction 904 Procedures Public Notice*"), at ¶ 43.

¹² As noted in Section IV, WC intends to meet its RDOF voice obligations via VoIP services, WC plans to file a separate CLEC Certification Application with the Commission.

Pleadings, orders, notices or other correspondence and communications regarding this Petition should be provided to:

Nicole Winters
Windstream
Counsel II
4001 North Rodney Parham Road
Little Rock, AR 72212
501-748-6313
Nicole.Winters@windstream.com

The name and title of the officer or representative of WC authorizing this Petition is, Jeff Small, whose signature appears at the end of this Petition as **Exhibit B**.

III. Request for Expedited Consideration

In order to be eligible for RDOF funds, WC must be designated as an ETC in the Census Block Groups. The FCC's rules for the RDOF Auction did not require that participants be an ETC as of the initial short-form application filing deadline.¹³ Instead, a company that is awarded support is expected to obtain an ETC designation for the areas covered by its successful bids within 180 days after being announced as a winning bidder.¹⁴ Winning bidders must submit appropriate documentation of such ETC status to the FCC.¹⁵ As noted, WC has been selected as a winning bidder in the RDOF Auction for 20 eligible census block groups in Minnesota. Because the timeframe for WC to obtain ETC designation is short and the consequences of failure to do so would prevent WC from expanding service to the Census Block Groups, WC respectfully requests that the Commission review this application promptly and grant ETC designation to WC on an expedited basis.

¹³ *Auction 904 Procedures Public Notice*, at ¶ 136.

¹⁴ *Id.*

¹⁵ *Id.*

IV. WC Meets the Requirements for ETC Certification

WC, meets the requirements of ETC designations. WC will comply with the requirements under Section 214(e)(2) of the Act, provides all of the services and functionalities supported by the federal universal service program under 47 C.F.R. § 54.101 and will do so in the Census Block Groups that are the subject of this petition.

A. WC Will Provide Service as a Common Carrier (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d))

For purposes of this designation, WC will offer a proven fiber-to-the-premise network architecture to deliver broadband and VoIP services. WC's affiliates have extensive experience deploying this type of network as it has constructed this same network to over 477,000 consumer and business locations in 18 states. Subscriber voice traffic will transit Windstream Service's highly redundant, all-fiber network and connect with Windstream Services' wholly-owned switching network, which currently supports nearly 2 million voice lines across 18 states. As such, with respect to the VoIP service it plans to deploy in the areas listed in **Exhibit A**, WC is a common carrier.

B. WC Satisfies All Federal Requirements for ETC Designation

Section 214(e) of the Act requires a carrier seeking ETC designation to certify that it offers services supported by the federal universal service support mechanisms under Section 254(c) using either its own facilities or a combination of its own facilities and the resale of services of another carrier. Section 214(e) further requires the carrier to advertise the availability and charges for such services using media of general distribution.

WC hereby commits and certifies that it will offer, either directly or through a resale relationship, voice and broadband services to those areas within the Census Block Groups. WC will further ensure that both the availability and costs for such services will be advertised using

appropriate media. WC further commits that it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the universal service support is intended. *See* 47 U.S.C. § 254(e) and 47 C.F.R. § 54.7(a).

C. WC Will Offer the Services Supported by the Federal Universal Service Support Mechanisms (47 C.F.R. § 54.101)

WC will offer the following voice telephony and broadband services that are supported by federal universal service support mechanisms:¹⁶

- a. Voice Grade Access to the PSTN. WC will meet this requirement through the provision of fiber-based VoIP service that is interconnected to the PSTN, which will be offered as a standalone telephony service throughout its territories listed in **Exhibit A**.¹⁷ The service will include minutes of use for local service provided at no additional charge to end users (specifically, WC's service plans will offer unlimited usage within the United States); and access to emergency services via 911 and E-911, where implemented by local government or other public safety organizations. WC will also provide toll limitation services to qualifying low-income consumers or may charge the same prices for toll and non-toll calls in accordance with the FCC's rules.¹⁸
- b. Broadband Internet Access Services. WC will offer fiber-based broadband Internet access service that provides the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service.¹⁹ End user connections will be routed to a local or regional exchange, where WC will interconnect through an Internet exchange point that carries traffic to all or substantially all Internet end points.

WC commits to provide these services consistent with applicable universal service support rules and will meet the service requirements for RDOF Phase I support.²⁰ WC will offer at least one standalone voice plan and one service plan that provides high speed broadband. These plans will be offered at rates that are reasonably comparable to rates offered in urban areas.²¹ WC will

¹⁶ 47 C.F.R. § 54.101.

¹⁷ *See id.* § 54.101(b).

¹⁸ *See id.* § 54.101(a)(1).

¹⁹ *See id.* § 54.101(a)(2).

²⁰ *See id.* § 54.101(c).

²¹ *See Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 707-08, paras. 42-43.

be responsible for providing customer care, providing quality of service guarantees, and meeting the FCC's universal service fund-related requirements.²²

WC also will make available Lifeline services to qualifying low-income consumers pursuant to the FCC's rules at all locations in Minnesota where it is authorized to receive RDOF support.²³

D. WC Will Provide Service Using Its Own Facilities or a Combination of its Own Facilities and Resale of Another Carrier's Services (47 U.S.C. § 214(e)(1)(A), 47 C.F.R. § 54.201(d)(1))

WC will primarily offer supported services using its own facilities, and may use a combination of its own facilities and resale of another carrier's services depending on the deployment scenario.²⁴ WC will have the exclusive right to use the broadband facilities it deploys to offer the supported services.

E. WC Will Provide Service Throughout Its Designated Service Area (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d))

WC commits to providing the supported services throughout the Census Block Groups identified in **Exhibit A**, consistent with all applicable requirements.²⁵

F. WC Will Advertise the Availability of Its Services and Charges Using Media of General Distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2))

WC will advertise the availability of and charges for its supported service offerings using media of general distribution, and will undertake outreach initiatives to increase consumer

²² See *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, Public Notice, WC Docket No. 09-197 et al., 33 FCC Rcd 6696, 6698 (WCB 2018) (“*ETC Designation Public Notice*”); see also *RDOF Auction Procedures PN* at 6129, para. 139.

²³ 47 C.F.R. §§ 54.101(d) and 54.405(a); see also *RDOF Auction Procedures PN*, 35 FCC Rcd at 6128 (stating, “[e]ach Auction 904 support recipient must offer Lifeline voice and broadband service throughout the eligible areas covered by its winning bids to qualifying low-income consumers pursuant to the Lifeline program rules.”).

²⁴ See 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.101; see also *ETC Designation Public Notice*, 33 FCC Rcd at 6698 (“Facilities are the ETC’s ‘own’ if the ETC has exclusive right to use the facilities to provide the supported services or when service is provided by any affiliate within the holding company structure.”).

²⁵ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

awareness of its service offerings, consistent with all applicable requirements.²⁶ WC will offer and advertise its VoIP and broadband services through various marketing channels, including but not limited to direct mail, email, local and community outreach events, and targeted online electronic advertising. In addition, WC will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

G. WC Meets the Additional Requirements for Designation as an ETC (47 C.F.R. § 54.202)

The FCC's March 17, 2005, *ETC Criteria Order* sets forth certain additional elements for ETC applications.²⁷ The applicable FCC criteria, promulgated at 47 C.F.R. § 54.202(a), require that an ETC applicant must²⁸:

- Certify it will comply with the service requirements applicable to the support that it receives;
- Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area;
- Demonstrate the ability to remain functional in emergency situations; and
- Demonstrate that it will satisfy applicable consumer protection and service quality standards.

1. WC Will Comply with Service Requirements Applicable to the Support it Receives

Pursuant to 47 C.F.R. § 54.202(a)(1)(i), WC hereby certifies that it will comply with the service requirements applicable to the supported services that it will be offering in the Census Block Groups. Upon request, WC will provide timely service to all customers within the Census Block Groups where WC's network will provide coverage. If a potential customer is within WC's licensed area but outside of its existing network coverage, WC will work to provide service at a

²⁶ See 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d).

²⁷ See *Federal-State Board on Universal Service*, CC Docket 96-45, Report and Order, 20 FCC Rcd 6371 (March 17, 2005) ("*ETC Criteria Order*").

²⁸ See 47 C.F.R. § 54.202(a)(1)-(3).

reasonable cost. WC further certifies that it will comply with any applicable requirements for service specific to the RDOF Auction.

2. Five-Year Plan Requirement Has Been Waived

Normally, the FCC requires that an ETC applicant submit a five-year plan describing proposed improvements or upgrades to the applicant's network throughout its proposed service area. In this case, the FCC has waived the requirement that RDOF Auction winning bidders submit a five-year service improvement plan.²⁹ Accordingly, WC need not specifically demonstrate the existence of a five-year plan, as the underlying objective of furthering service access and public interest will be verified and assured through mechanisms specific to the Census Block Groups and the RDOF Auction.

3. WC Will Remain Functional During Emergencies

WC certifies that it is able to function in emergency situations as required under 47 C.F.R. § 54.202(a)(2). WC's voice and broadband network is designed to remain functional in emergency situations without an external power source, will remain functional using backup power, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required. *See* 47 C.F.R. § 54.202(a)(2). WC further monitors its networks with sophisticated equipment capable of detecting disruptions caused by emergency situations that allow WC to respond quickly.

²⁹ For recipients of Connect America Fund ("CAF") Phase II support, the FCC waived the requirement that winning bidders seeking an FCC ETC designation file a five-year improvement plan and demonstrate that it will satisfy applicable consumer protection and service quality standards. *See Connect America Fund*, et al., WC Docket No. 1090 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949 (2016) (*CAF Phase II Auction Order*) at ¶¶ 157-68. Similarly, for purposes of the RDOF, the FCC incorporated by reference the analysis of forbearance factors that it considered and found warranted in CAF Phase II. *See RDOF Auction Order* at ¶ 95 & n. 271 and internal citations. *See also Auction 904 Procedures Order* at ¶ 136 & n. 308.

4. WC Will Meet Consumer Protection and Service Quality Standards

The FCC provides that an ETC applicant must “demonstrate that it will satisfy applicable consumer protection and service quality standards.” 47 C.F.R. § 54.202(a)(3). The FCC, however, waived the requirement that bidders seeking ETC designation certify that they will satisfy consumer protection and service quality standards.³⁰ To the extent necessary, WC requests a waiver of state requirements based on these waived FCC requirements.

V. Public Interest

WC’s designation as an ETC for the Census Block Groups will allow it to build out services to unserved areas using federal funding, bringing the benefits of added voice and high-speed broadband services to these areas. Accordingly, it is in the public interest to designate WC as an ETC in the Census Block Groups. Once the Commission grants WC’s ETC petition and the FCC approves WC for funding, WC will receive \$6,533,570.00 over a ten-year period to provide voice and broadband services to those residing and working in the Census Block Groups.

The availability of WC’s RDOF supported voice and broadband services will have a positive effect on unserved areas in the Census Block Groups. WC is committed to expanding access to these services that will enable consumers to access new opportunities of all kinds, including education, healthcare, business, civic engagement, and personal connection. New opportunities may include starting a business, taking online classes, or seeing friends and family, among many other possibilities. Expanded voice and broadband service will increase these opportunities for the people of Minnesota being served by WC in its respective RDOF Census Block Groups.

³⁰ See *supra*, n. 20.

Moreover, Minnesota consumers will particularly benefit from WC's designation as an ETC. WC is widely recognized as a premier provider of voice and broadband Internet offerings that relies on advanced systems, technologies, and infrastructure. WC provides voice and broadband Internet services to hundreds of thousands of residential customers in 18 states.

In addition, consumers will further benefit from WC's experience as a Lifeline service provider. WC and its affiliates have substantial experience in providing Lifeline services to low income consumers and communities. This will further facilitate WC's swift offering of needed services for qualifying low-income customers in the Census Block Groups.

VI. Conclusion and Request for Expedited Review

WC meets the requirements of both state and federal laws and regulations for designation as an ETC in the Census Block Groups listed in **Exhibit A**. Pursuant to 47 U.S.C. § 214(e), the Commission should designate WC as an ETC for the requested areas. By taking this action, the Commission will ensure that unserved consumers in the requested areas will have access to reliable voice and broadband service at rates equal to or less than what they are currently paying. Granting WC's request for ETC designation will benefit the public interest and increase competition.

WHEREFORE, for the reasons stated herein, WC respectfully requests that the Commission designate Windstream Communications, LLC as an ETC in the Census Block Groups listed in **Exhibit A** by no later than June 7, 2021 and order such other relief as may be appropriate.

- Signature Page Follows -

Date this 6th day of April, 2021.

WINDSTREAM COMMUNICATIONS, LLC

/s/ Nicole Winters
Nicole Winters
Counsel II
4001 North Rodney Parham Road
Little Rock, AR 72212
(501) 748-6313
Nicole.Winters@windstream.com

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Re: In the Matter of the Petition of Windstream Communications, LLC for Designation as Eligible Telecommunications Carrier

CERTIFICATE OF SERVICE

Nicole Winters hereby certifies that on the 6th day of April, 2021, she served the annexed filing of Windstream on the parties identified on the filing letter, by electronic mail, directed to said addresses at their last known email addresses.

/s/ Nicole Winters
Nicole Winters

EXHIBIT A
CENSUS BLOCK GROUPS

<u>Census Block ID</u>	<u>Census Block Group ID</u>	<u>County</u>
270030502331002	270030502331	Anoka County, MN
270030502331007	270030502331	Anoka County, MN
270030502331010	270030502331	Anoka County, MN
270030502331018	270030502331	Anoka County, MN
270030502331025	270030502331	Anoka County, MN
270030502331027	270030502331	Anoka County, MN
270030508092008	270030508092	Anoka County, MN
270030508092019	270030508092	Anoka County, MN
270030508092021	270030508092	Anoka County, MN
270030509012012	270030509012	Anoka County, MN
270030516003009	270030516003	Anoka County, MN
270030516003011	270030516003	Anoka County, MN
270030516003024	270030516003	Anoka County, MN
270030516003028	270030516003	Anoka County, MN
270030516003032	270030516003	Anoka County, MN
270251101003004	270251101003	Chisago County, MN
270251101003007	270251101003	Chisago County, MN
270251101003016	270251101003	Chisago County, MN
270251101003025	270251101003	Chisago County, MN
270251101003058	270251101003	Chisago County, MN
270251101003069	270251101003	Chisago County, MN
270251101003077	270251101003	Chisago County, MN
270251102001003	270251102001	Chisago County, MN
270251102001004	270251102001	Chisago County, MN
270251102001006	270251102001	Chisago County, MN
270251102001007	270251102001	Chisago County, MN
270251102001008	270251102001	Chisago County, MN
270251102001010	270251102001	Chisago County, MN
270251102001011	270251102001	Chisago County, MN
270251102001015	270251102001	Chisago County, MN
270251102001016	270251102001	Chisago County, MN
270251102001032	270251102001	Chisago County, MN
270251102001034	270251102001	Chisago County, MN
270251102001035	270251102001	Chisago County, MN
270251102001036	270251102001	Chisago County, MN
270251102001038	270251102001	Chisago County, MN
270251102001039	270251102001	Chisago County, MN

<u>Census Block ID</u>	<u>Census Block Group ID</u>	<u>County</u>
270251102001041	270251102001	Chisago County, MN
270251102001042	270251102001	Chisago County, MN
270251102001044	270251102001	Chisago County, MN
270251102001045	270251102001	Chisago County, MN
270251102001047	270251102001	Chisago County, MN
270251102001048	270251102001	Chisago County, MN
270251102001050	270251102001	Chisago County, MN
270251102001053	270251102001	Chisago County, MN
270251102001054	270251102001	Chisago County, MN
270251102001055	270251102001	Chisago County, MN
270251102001057	270251102001	Chisago County, MN
270251102001071	270251102001	Chisago County, MN
270251102001072	270251102001	Chisago County, MN
270251102001073	270251102001	Chisago County, MN
270251102001075	270251102001	Chisago County, MN
270251102001078	270251102001	Chisago County, MN
270251102001104	270251102001	Chisago County, MN
270251102002000	270251102002	Chisago County, MN
270251102002002	270251102002	Chisago County, MN
270251102002029	270251102002	Chisago County, MN
270251102002034	270251102002	Chisago County, MN
270251102002043	270251102002	Chisago County, MN
270251102002046	270251102002	Chisago County, MN
270251102002047	270251102002	Chisago County, MN
270251102002051	270251102002	Chisago County, MN
270251102002052	270251102002	Chisago County, MN
270251102002053	270251102002	Chisago County, MN
270251102004001	270251102004	Chisago County, MN
270251102004003	270251102004	Chisago County, MN
270251102004005	270251102004	Chisago County, MN
270251102004010	270251102004	Chisago County, MN
270251102004038	270251102004	Chisago County, MN
270251102004053	270251102004	Chisago County, MN
270251102004057	270251102004	Chisago County, MN
270251102004080	270251102004	Chisago County, MN
270251102004086	270251102004	Chisago County, MN
270251102004088	270251102004	Chisago County, MN
270251102004089	270251102004	Chisago County, MN
270251102004090	270251102004	Chisago County, MN

<u>Census Block ID</u>	<u>Census Block Group ID</u>	<u>County</u>
270251102004091	270251102004	Chisago County, MN
270251102004096	270251102004	Chisago County, MN
270251102004098	270251102004	Chisago County, MN
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<u>Census Block ID</u>	<u>Census Block Group ID</u>	<u>County</u>
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270591305022097	270591305022	Isanti County, MN
270591305022108	270591305022	Isanti County, MN
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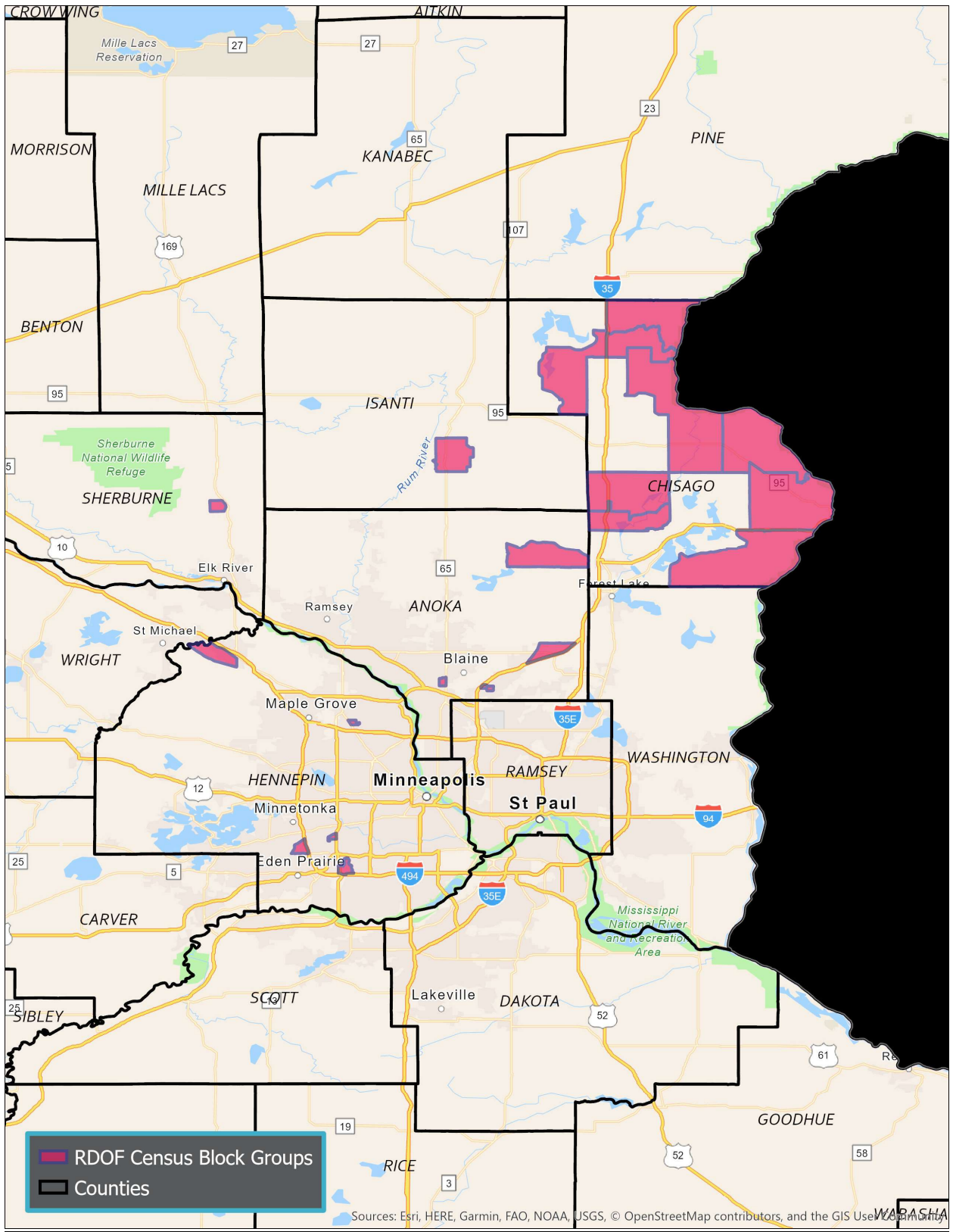


EXHIBIT B

VERIFICATION

I, Jeff Small, state that I am President – Kinetic of Windstream Services, LLC and Windstream Communications, LLC; that I am authorized to make this Verification on behalf of the companies; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.



Jeff Small
President – Kinetic