
**BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 North Robert Street
St. Paul, Minnesota 55101**

**FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 7th Place East
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St. Paul, Minnesota 55101-2147**

MPUC Docket No. P421/AM-16-496

**In the Matter of the Petition of CenturyLink QC to be Regulated Pursuant to Minn.
Stat. § 237.025; Competitive Market Regulation**

**REPLY BRIEF
OF THE OFFICE OF THE ATTORNEY GENERAL
RESIDENTIAL UTILITIES AND ANTITRUST DIVISION**

March 23, 2017

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REPLY BRIEF OF THE OFFICE OF THE ATTORNEY GENERAL

INTRODUCTION

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) respectfully submits its Reply Brief contesting Qwest Corporation d/b/a CenturyLink QC’s (“CenturyLink” or “the Company”) June 30, 2016 Petition to be regulated pursuant to Minnesota Statutes section 237.025, the Competitive Market Regulation Statute. This Reply will focus on issues raised by the Company and the Minnesota Department of Commerce (the “Department”) in their initial briefs that require a response.

ANALYSIS

Under the Competitive Market Regulation statute and the chosen compliance track under which CenturyLink seeks regulatory relief, the Company must demonstrate—to the Commission’s satisfaction—that it meets the two statutory tests. First, it must demonstrate that “it serves fewer than 50 percent of the households in each exchange service area.”¹ Second, it must demonstrate that “at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider.”² In its Initial Brief, CenturyLink described

¹ Minn. Stat. § 237.025 subd. 4(1).

² Minn. Stat. § 237.025 subd. 4(1).

the tests in front of the Commission as “simple.”³ Throughout its brief, the Company glossed over the numerous assumptions—many of which have been called into question—that undergird the analyses provided by the Company in support of these tests. But the analysis in front of the Commission is not so simple and, because of the significant ramifications that approval would have in the areas of the state most dependent on CenturyLink’s voice service, the Commission must closely scrutinize the Company’s record support.

As the OAG stated in its Initial Brief,⁴ although the Commission cannot base its ultimate decision on the broader economic, technologic, and policy analyses present in “Track 2” of the statute, there are still a number of instances where the public interest can be considered as it specifically applies to the reasonableness of the Company’s analyses in this case. In other words, there are a constellation of decision points and assumptions that the Company relies upon in order to justify crossing the statutory thresholds. The Commission must examine the reasonableness of each assumption made by the Company in pursuit of deregulation to ensure that, for any exchange that it approves, it does so after unpacking and evaluating the entirety of the Company’s showing for that exchange.

This section will respond to arguments made in CenturyLink’s Initial Brief regarding these issues of reasonableness in four parts. First, the Company has failed to support its analysis under the threshold 50 percent test, thus requiring the Commission to deny approval for the exchanges where it fails to meet the clear standard. Second, the Company has failed to support significant aspects of its 60 percent showing that call into question all data on wireline competition. Third, the Commission must resolve doubts as to reasonableness in favor of consumers as it considers wireless coverage in

³ CenturyLink Initial Brief at 6.

⁴ OAG Initial Brief at 16.

this case. Fourth, a lack of public participation in this docket has been exacerbated by poor customer notice sent out by the Company and the Commission should take steps to ensure the quality of future customer notices.

I. CENTURYLINK IMPROPERLY ACCOUNTED FOR THE HOUSEHOLDS IT SERVES UNDER THE 50 PERCENT TEST.

The Company began its analysis of the 50 percent test by stating that “the Commission must simply calculate the following ratio for each exchange service area: Households Served by CenturyLink/Number of Households x 100%.”⁵ In this analysis, the number of households served by the Company is the numerator and the denominator is the total number of households. This “simple” calculation, the Company argued, “establishes that CenturyLink serves less than 50 percent of the households in each [disputed] exchange service area.”⁶ In actuality, however, the Company’s analysis requires several unreasonable logical leaps that would result in direct harm to consumers.

The Company argued that it “took a conservative approach” to the calculation of its market share.⁷ According to CenturyLink, this conservative approach is demonstrated by its inclusion in the numerator of residential lines provided to housing units, which encompasses a broader field than households, which is a subset of housing units.⁸ Hence, there could be a certain number of lines counted in the numerator that are not being utilized by a household, but rather a vacant or intermittently-used housing unit. Inflating the numerator would serve to increase the market share percentage that under the statutory standard, which would be conservative in this case. While the

⁵ CenturyLink Initial Brief at 7.

⁶ *Id.* at 7.

⁷ *Id.*

⁸ In its brief, the Company describes the difference between a “household,” which is the “usual place of residence” under U.S. Census Bureau definitions and a “housing unit,” which is a “house, an apartment, a mobile home or trailer, a group of rooms, or a single room occupied as separate living quarters, or, if vacant, intended for occupancy as separate living quarters.” *Id.* at 8.

arithmetic may be simple enough, the record highlights two instances where the Company inappropriately diverged from its methodology in order to ensure that it met the 50 percent standard.

A. The Commission should reject CenturyLink’s petition for the Cook, Tofte, and Grand Marais exchanges because they do not meet the 50 percent standard.

First, the Company relied upon its “conservative” method; but only until it resulted in exchanges that fail to meet the statutory 50 percent standard. In three exchanges—Cook, Tofte, and Grand Marais—the method employed by the Company for the 106 other exchanges results in market shares well in excess of the 50 percent standard. For these exchanges, the Company asserted that “the percentage of housing units that are households in these areas is significantly smaller than the statewide average.”⁹ According to the Company, this resulted in an “overstatement of the percentage of *households* that CenturyLink serves.”¹⁰ While this may be the case, the Company’s proposal to “adjust” its market share calculation is not reasonable.

The Company’s proposed adjustment to its calculation of the numerator—the number of households served—is to reduce its line count by the ratio of households to housing units in the exchanges.¹¹ For example, assume a Company had 60 lines serving 100 households (a 60 percent market share) in an exchange with 200 housing units. CenturyLink’s manipulation would multiply the 60 lines in the numerator by the ratio of households to housing units (100 households / 200 housing units = 0.5) to equal 30 lines (60 x (100/200) = 30). Under this assumption, a 60 percent market share is artificially reduced to a 30 percent market share, as the 100 household denominator remains unchanged, but the numerator is reduced from 60 to 30. This unreasonably assumes that the same percentage of full time residents receive voice service from CenturyLink than part-time vacationers who own second homes, mobile homes, or trailers in the exchange. Further, the

⁹ *Id.* at 11.

¹⁰ *Id.* (emphasis added).

¹¹ *Id.*

Company provides no evidence in the record to support this logical leap whose only support appears to be that it results in market shares below 50 percent. Failure to meet the threshold question in this analysis means that the Commission must reject the Company's petition for the Cook, Tofte, and Grand Marais exchanges.

B. The Commission should include the small business customer counts provided by Mr. Brigham when calculating CenturyLink's market share.

Second, the Company's "conservative" customer count,¹² as described in Mr. Lubeck's Affidavit, is not even the most conservative customer count that the Company itself provided in the record. In its initial petition, Mr. Brigham presented a customer count he described as a "ceiling," which also included lines serving business customers with three or fewer lines.¹³ As stated in Mr. Lubeck's affidavit, his affidavit "is intended to supplement" the initial affidavits sponsored by Mr. Brigham in this docket.¹⁴ Mr. Lubeck presented customer count information stripped of the previously-counted small business lines included in Mr. Brigham's count. Mr. Lubeck concluded that this was reasonable after his "careful review" of the statute.

Nevertheless, Mr. Brigham's customer count that is inclusive of the small business lines that would also be affected by Commission approval of CenturyLink's petition remains in the record. CenturyLink's brief failed to elaborate on the legal rationale advanced by Mr. Lubeck for stripping out these small business lines from its customer count. Mr. Lubeck's argument is that the Competitive Market Regulation statute's market share test refers only to "households" and that since "[s]mall business customers are not considered as "households" by the Census Bureau," it is proper to strip out the small business customer lines from the customer count calculation.¹⁵ But there are

¹² *Id.* at 7.

¹³ Aff. of Robert Brigham at ¶ 7 (Jun. 30, 2016).

¹⁴ Aff. of Al Lubeck at ¶ 2.

¹⁵ *Id.* at ¶ 11.

two reasons why the Commission should reject this argument and use Mr. Brigham's customer counts, inclusive of small business accounts, as a conservative starting point upon which to base customer counts for the market share analysis.

First, as the Department noted in its Initial Brief, it is possible that a residential customer could reasonably choose to subscribe to a business line instead of a residential line due to specific features of business lines, such as advertising, that are not available to residential line customers.¹⁶ In its Initial Brief, the Company responded to this assertion by attempting to shift the burden of proof to the Department's witness Ms. Gullikson by stating that the "Department is unable to identify any particular exchange" where this adjustment would make a difference in the ultimate conclusion.¹⁷ The Company further questioned Ms. Gullikson's ability to account for other adjustments to the customer counts that may be necessitated by inclusion of business lines doubling as residential lines.¹⁸

The Company ignores the informational imbalance between governmental intervenors and a vast corporation. CenturyLink is the only party to this case that would have the information and the resources to properly account for this scenario, but it instead chooses to downplay the impact and discredit the Department's witness. Due to the unresolved concerns regarding the impact of small business lines that are utilized in lieu of residential lines, the only reasonable alternative for the Commission is to utilize Mr. Brigham's count of customer lines that is inclusive of all eligible small business lines. That is the only way to resolve this issue in favor of consumers since the Company has not offered any reasonable explanation to resolve the concerns first raised by the Department.

¹⁶ See Department Initial Brief at 9–10.

¹⁷ CenturyLink Initial Brief at 15.

¹⁸ *Id.*

The second reason that the Commission should consider a customer count that is inclusive of small business customers is that small business customers would be directly affected by Commission approval of the Company's petition. This impact is rooted in the statute itself. The carrier "petition[ed] the [C]ommission to have its residential voice services *and business voice services to customers subscribing to three or fewer business lines* regulated under this section."¹⁹ The Company has recognized the reasonability of including eligible small business lines in its initial customer count as a "ceiling" for its baseline customer count, which is the numerator of the market share calculation.²⁰ Similarly, it chose to exclude the count of eligible small businesses in the denominator of the market share analysis, citing data availability concerns.²¹

Since Mr. Brigham's confidential Exhibit RHB-3 contains eligible small business customers in the numerator of the market share calculation, but does not include potential eligible small businesses in the denominator, it is true that the calculation thus trends toward the conservative end of the spectrum. But it is important to remember that the Company chose to present this data in this way in Mr. Brigham's affidavit and concluded that "this calculation provides a 'ceiling' for the percentage of residential customers and business customers with three or fewer lines that subscribe to CenturyLink QC voice service."²² Had the Company chosen to present a methodology to estimate the number of potential eligible small businesses in its exchanges, it could have done that and the Commission then could have assessed the reasonability of the estimate. This does not alter the fact that it chose not to and instead decided to strip all small business customers out of the numerator in its subsequent presentation of the customer count.

¹⁹ Minn. Stat. § 237.025 subd. 2(a).

²⁰ Aff. of Robert Brigham at ¶ 7.

²¹ *Id.*

²² *Id.*

C. The Commission should reject CenturyLink’s petition for Coleraine, Comstock, Cook, Grand Marais, Pine City, Silver Bay, Swanville, Tofte, and Biwabik because they fail to meet the 50 percent market share standard.

The OAG’s Table 1 from its Initial Brief lists those exchanges that objectively fail the 50 percent test using the customer count provided by Mr. Brigham and including the Department’s subsequent adjustments to the counts to include UNE-P and resale lines.²³ For three of these exchanges—Cook, Tofte, and Grand Marais—the Company has unreasonably manipulated the data comprising the customer count solely in order to meet the 50 percent standard. For the other exchanges, the Company’s stripping of eligible small business customers from its market share customer count is unsupported by the record and by the law and should thus be rejected.

In addition to the concerns regarding the 50 percent test, the Company’s Initial Brief also fails to address concerns regarding the second test to be applied in this case: the requirement that 60 percent of households have the ability to choose voice service from at least one eligible competitive service provider. The next section will discuss the concerns raised in initial briefing.

II. CENTURYLINK’S INITIAL BRIEF FAILS TO DEMONSTRATE THAT THE COMPETITIVE MARKET REGULATION STATUTE’S 60 PERCENT REQUIREMENT HAS BEEN MET IN MANY OF ITS EXCHANGES.

To meet the second required element for Competitive Market Regulations status, CenturyLink must demonstrate that “at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider.”²⁴ To pass muster, CenturyLink must demonstrate both that the other providers are, by definition, competitive service providers and that at least 60 percent of households can choose voice service from at least one eligible competitive service provider. CenturyLink’s brief illustrates two

²³ The Department alternately includes a list of exchanges that it argues do not meet or only marginally meet the 50 percent criterion in its Initial Brief. Department Initial Brief at 50.

²⁴ Minn. Stat. § 237.025 subd. 4(1).

significant shortcomings in its analysis under this requirement. First, the Company relies upon an incomplete and, thus, inaccurate, definition of competitive service provider, which results in overcounting the households with the choice of voice service. Second, the Company incorrectly assumes that it can aggregate eligible competitive service providers to get to the 60 percent threshold. Both errors call into question the validity of the entirety of the Company's showing with regard to wireline voice choice in its exchanges and, as a result, the Commission should give no weight to any of the wireline competition or, in the alternative, should reject the wireline data for the specific exchanges described below.

A. CenturyLink includes wireline providers that do not meet the statutory definition of competitive service provider.

In its Initial Brief, the Department raised concerns regarding by the very definition of competitive service provider advanced by the Company.²⁵ Under the statute, a wireline competitive service provider must meet two criteria: first, it must “own[] a substantial portion of the last-mile or loop facilities; and second, it must be able to “deliver[] service to a majority of households in an exchange area.”²⁶ Thus, to be counted in the 60 percent test, CenturyLink must first demonstrate that each household being tallied can choose voice service from an entity meeting the statutory definition of competitive service provider. In particular, in addition to owning a “substantial proportion” of its facilities, the provider must be able to deliver service to 50 + 1 percent of households—a simple majority—to be counted toward the 60 percent threshold under the statute.

²⁵ Department Initial Brief at 5, 25–26. “CenturyLink has failed to show that 60 percent of households in each of its exchanges can choose voice service from a CSP, because CenturyLink appears to have disregarded the statutory requirement that a cable or broadband provider, to be deemed a CSP under Minn. Stat. § 237.025 subd. 1 (a) (2) must own “a substantial portion of the last-mile or loop facilities delivering *service to a majority of households* in an exchange service area.” *Id.* at 25.

²⁶ Minn. Stat. § 237.025 subd. 1(a)(2).

CenturyLink has ignored, in both its affidavits and in its Initial Brief, the majority requirement present in the definition of competitive service provider. Mr. Lubeck argued that cable companies meet the statutory definition simply by their ownership of last-mile or loop facilities, with no mention of their ability to deliver to a majority of households.²⁷ In its Initial Brief, the Company simply repeated the flawed logic that, because a cable company owns its facilities, it must be a competitive service provider.²⁸ To complete this analysis, the Commission must consider whether a cable company also has the capability of “delivering service to a majority of households in an exchange area.”²⁹

One adjustment to data provided by the Company regarding cable voice choice is to screen wire centers where less than a majority of households can choose voice service from a cable provider. There are 31 wire centers where fewer than 50 percent of households have access to cable service.³⁰ Notwithstanding the Department’s concerns regarding the Company’s process of determining availability of broadband and of equating broadband to voice service, this means that 31 wire centers do not, by definition, have a cable provider capable of delivering service to a majority of households—the very definition of competitive service provider. Thus, even if only one cable company accounted for all of these cable-accessible households in a wire center or exchange, since it still would not reach a majority of households, then these wire centers must fail to meet the statutory definition of competitive service provider and the households cannot be counted toward the 60 percent threshold.

There is an important interplay in the statute between the definition of competitive service provider and the 60 percent test. The majority requirement in the definition does not make the 60

²⁷ Aff. of Al Lubeck at ¶ 14.

²⁸ CenturyLink Initial Brief at 23.

²⁹ Minn. Stat. § 237.025 subd. 1(a)(2).

³⁰ Aff. of Al Lubeck at AL-4. A list of the 31 wire centers is found in Appendix A.

percent test superfluous. In fact, the majority requirement serves at least two important functions in the analysis. First, under Track 2³¹—which is not at issue in this docket—it must make additional showings under subdivision 4(2), including a demonstration that no economic or market entry barriers exist and that no single provider has the ability to maintain prices above competitive levels or otherwise deter competition.³² Like Track 1, the petitioner must also demonstrate that the 60 percent test is met by an eligible competitive service provider, but evidence of other competitive service providers who meet the majority requirement, but not the 60 percent requirement, could be used as evidence of the presence of competitors in the exchange.

The second function the majority threshold serves is that it prevents the petitioning carrier from improperly aggregating service providers to meet the 60 percent threshold. A petitioning carrier thus cannot aggregate three providers who each serve 20 percent of the exchange to meet the 60 percent barrier because none of the three providers meet the definition of competitive service provider. As the next section will discuss, there are legal and policy reasons for prohibiting such a practice and the Commission should not rely upon data provided by CenturyLink for the exchanges in which it improperly aggregates providers.

B. CenturyLink cannot aggregate competitive service providers to meet the 60 percent threshold.

The definition of competitive service provider is important because CenturyLink attempts to aggregate providers that do not meet the statutory definition of competitive service provider in order to meet the 60 percent test. Indeed, in its Initial Brief, the Company acknowledged that it “looked to

³¹ A showing under Track 2 would be necessary if the carrier sought regulatory relief where it serves greater than 50 percent of households. Although it appears that CenturyLink does serve greater than 50 percent of households in some exchanges, the Company did not seek relief under the more stringent Track 2.

³² Minn. Stat. § 237.025 subd. 4(2).

several sources to *estimate* the availability of competitive alternatives.”³³ But it wrongly asserted that “if CenturyLink can demonstrate to the Commission’s satisfaction that 60% of the customers in an exchange, through a combination of wireline and wireless options, have the opportunity to take non-CenturyLink service, that exchange meets the criteria.”³⁴ The Company also wrongly asserted that the 60 percent standard could be met simply by inference for exchanges where it serves fewer than 40 percent of households.³⁵ Both the definition of competitive service provider and the statutory language that establishes the 60 percent test requires much more than a deduced notion of competition.

As previously stated, the 60 percent threshold requires a demonstration that “at least 60 percent of households” can “choose voice service from at least one additional unaffiliated competitive service provider.”³⁶ This provision requires—at a minimum—the ability of 60 percent of households to choose service from—at a minimum—one additional, eligible competitive service provider. In other words, at least one additional competitive service provider must be able to offer voice service to at least 60 percent of households in an exchange. This requirement establishes the bare minimum needed for approval of an exchange under the 60 percent threshold. No aggregation is envisioned under the wording of the statute and CenturyLink cannot now revise the meaning of the statute to fit its needs in exchanges where it does not meet the 60 percent standard.

In addition to the plain language meaning of the statute, there are strong policy reasons that support the statute’s requirement that at least one competitive service provider be able to offer service to at least 60 percent of households. The presence of at least one competitive service provider that meets the 60 percent threshold, though not dispositive, is indicia of some level of

³³ CenturyLink Initial Brief at 16 (emphasis added).

³⁴ *Id.* at 17.

³⁵ *Id.*

³⁶ Minn. Stat. § 237.025 subd. 4(1).

competition in that exchange. On the other hand, the presence of multiple competitive providers each offering service to fewer than 60 percent of households, does not indicate competition in that exchange. For example, it is possible that those providers are clustered in a particularly dense area of the exchange and so combining the percentages would result in significant overlap. This could result in an exchange where 20 percent of households could choose voice service from 4 competitive service providers. In that scenario, the proper accounting under the statute would be 0 percent—not 80 percent (20 percent x 4), as the Company would have it.³⁷ To the extent possible under this statute, the more limited—and only reasonable—interpretation of the 60 percent test ensures that at least a modicum of competition exists in an exchange that surpasses the threshold.

1. CenturyLink improperly aggregated cable providers and “other wireline providers” such as CLECs.

The concern regarding aggregation is no mere academic exercise; improper aggregation results in scores of exchanges where wireline providers, both cable providers and CLECs, should not be considered as meeting the 60 percent test.

First, that CenturyLink aggregated the households available to be served by multiple cable companies in the same exchange. This means that it counted the households represented by two or more cable companies serving the same wire center, even if one or more of those companies could serve less than the majority of households in the center.

Take, for example, the Nashwauk exchange. The Company’s Exhibit AL-3 indicates that 57 percent (835 / 1,465) of households in that exchange are able to receive cable service, which is lower than the 60 percent standard. But even this number overstates the percentage of households that can choose voice service from an *eligible* competitive services provider. That is because two companies

³⁷ Since none of the four providers would be eligible as competitive service providers.

in that exchange, Mediacom and Savage Communications, both make service available to a roughly equal number of households in that exchange (421 and 414 households, respectively).³⁸ This means that Mediacom makes service available to only 29 percent (421 / 1,465) of households in that exchange and that Savage Communications makes service available to only 28 percent (414 / 1,465) of households in that exchange, both well under the majority required to be counted as a competitive service provider.

The Nashwauk exchange is an ideal example of why the statutory language first requires a competitive service provider to be able to deliver service to a majority of households in an exchange. It is unclear from the data provided by the Company whether there is any overlap amongst the roughly 400 households served by both cable providers. The Company's tally assumes that none of the 400 houses that can receive service from Mediacom can receive service from Savage Communications, and vice versa. This presents a problem, because the reality could be much different. For example, if both companies' service territories exhibited significant overlap, then the roughly 400 households would have at least 3 choices: CenturyLink, Mediacom, and Savage Communications—but many of the other roughly 1,000 households could have no choice. The baseline requirement that a competitive service provider be able to deliver service to a majority of households in the exchange ensures that scenarios like the Nashwauk exchange do not get approval simply because of the addition of several smaller "competitors." The prohibition on aggregation would also prevent combining two competitive service providers (both with service available to a majority of households) to meet the 60 percent standard.³⁹

³⁸ Aff. of Al Lubeck at AL-4 and AL-5.

³⁹ For instance, even two competitive service providers who provide access to 55 percent of households each would not meet the 60 percent threshold.

This problem is even more widespread for CenturyLink’s support for CLECs, which it labels “Other Wireline Providers” in the record. The Company includes CLECs that do not meet the statutory definition of competitive service provider⁴⁰ and it improperly aggregates providers toward the 60 percent standard. Under the statute, CLECs can be counted as a competitive service provider, but *only if* they own a substantial proportion of their facilities and *only if* they have the capability to deliver service to a majority of households in the exchange—the same standard as cable companies. More than three-quarters of the wire centers (125 / 154) fail to meet the majority threshold to include household counts of CLECs as a competitive service provider.⁴¹ The Commission thus cannot consider any household counts from “Other Wireline Providers” for these wire centers.

C. The Commission should not consider any of CenturyLink’s wireline data in making its final determination in this case.

The record demonstrates the significant concerns that have been generated by CenturyLink’s strained definition of competitive service provider and by its attempted aggregation of wireline providers to meet the 60 percent standard in each exchange. Exhibit AL-10 demonstrates the impact that these decisions have had on CenturyLink’s 60 percent showing. This exhibit “provides the aggregate household coverage for cable and wireline providers for each wire center . . . [it] take[s] into account the fact that some households are covered by both cable and other wireline providers, while other households are covered only by a cable or other wireline voice provider.”⁴² This means that there are three “bins” of households included in CenturyLink’s availability showing and each bin contains aggregate counts of various providers in each wire center/exchange.

One way to better understand the impact that aggregation has is to remove any “bin” where less than a majority of households have service available. While imprecise, it represents a global

⁴⁰ CenturyLink Initial Brief at 23.

⁴¹ Aff. of Al Lubeck at AL-7.

⁴² *Id.* at ¶ 18.

adjustment more in line with the statutory requirement for competitive service providers. This correction results in the failure of 39 wire centers to reach the required 60 percent threshold, up from the 24 wire centers that the Company acknowledged in AL-10 that did not meet the standard. Thirteen of the 15 exchanges identified as failing or marginally failing in the OAG's Initial Brief fail after making this correction, with the Coleraine, Holdingford, Staples, Sabin, and Grand Marais exchanges now failing the wireline showing. A Table showing the changes to Exhibit AL-10 is attached in Appendix B.

More than simply adding to the list of exchanges that do not meet the standard, this adjustment demonstrates the unreasonable approach taken by CenturyLink to support the 60 percent test for wireline providers. To summarize, the Company first utilizes an incomplete definition of competitive service provider that results in its counting of many providers that fail to meet the majority requirement. This problem is exacerbated by the Company's aggregation of service providers to meet the 60 percent standard. As a result, because of the intertwined and pervasive nature of these two problems, significant doubt exists as to the Company's wireline data even before the Department's valid concerns regarding the methodology are taken into consideration. The Commission thus should decline to consider any of the data provided by the Company as it relates to wireline providers when making a determination about the 60 percent standard. This leaves the Commission with only the wireless data to support the 60 percent standard; the next section will briefly discuss remaining issues related to this analysis.

III. THE COMMISSION SHOULD RESOLVE CONCERNS REGARDING CENTURYLINK'S WIRELESS DATA TO THE BENEFIT OF CONSUMERS.

The Commission should, as argued by the Department, "conclude that *indoor* signal strength is the appropriate measure of whether a household can choose wireless as a CSP's competitive voice

service.”⁴³ Given the concerns identified above regarding the wireline data, approval of CenturyLink’s petition with respect to the 60 percent standard must hinge solely upon its demonstration of compliance for wireless coverage. It cannot follow, then, that an exchange’s wireless coverage requirement is met by marginal outdoor coverage as this would result in direct harm to Minnesota’s most vulnerable populations.⁴⁴ When assessing the quality of the Company’s wireless market share data, the Commission should resolve doubts as to reasonableness in favor of consumers.⁴⁵

IV. CENTURYLINK’S INADEQUATE NOTICE CONTRIBUTED TO THE LIMITED CUSTOMER RESPONSE IN THIS DOCKET.

Finally, the evidence in the record highlights the inadequacy of the Company’s customer notice included in billing material in February. As of March 20, 2017, only one comment has been received in the Commission’s online comment board, which is open until March 31, 2017. One of the reasons for this low number is likely due to the language contained in the approved customer notice, which noted an earlier comment deadline of March 9, 2017. Although the Commission appears to have moved the public comment period back to March 31, it is doubtful that any customer is aware that this change occurred. Further, the language about the Commission’s online comment service was contained in the middle of the lengthy paragraph in the customer notice, in the same small font as the rest of the information. This is an unfortunate missed opportunity to give CenturyLink’s customers an opportunity for meaningful participation. The minimal public participation is not due to a lack of interest in this case, as CenturyLink argues,⁴⁶ but rather a lack of adequate notice from the Company. A newspaper article from Summer 2016 generated over three

⁴³ Department Initial Brief at 41 (emphasis in original).

⁴⁴ *Id.* at 42–43.

⁴⁵ OAG Initial Brief at 16.

⁴⁶ “[T]his proceeding shows little controversy.” CenturyLink Initial Brief at 2.

dozen comments from readers, with many, but not all, opposing the request by CenturyLink.⁴⁷ The OAG continues to believe that clear customer notice is vital in this case if the Commission approves any of the exchanges petitioned for by CenturyLink.

CONCLUSION

At first glance, the analysis required in this case is quite straightforward. The Company must show, in each exchange, that it passes two percentage-based criteria. A demonstration that it serves fewer than 50 percent of households and that at least 60 percent of households in each exchange can choose voice service from at least one competitive service provider. Despite the simple math that is ultimately at issue, there are a number of methodological assumptions that must be made in order to determine a market share percentage. The Company, through its affidavits and legal briefing, has argued that all of its assumptions are reasonable. Unsurprisingly, each of these assumptions favor the Company's conclusion that all of its exchanges meet the standards articulated by the statute. But despite the simplicity promised by the Company in its Initial Brief, an unpacking of these assumptions exposes the logical leaps the Company had to make in order to arrive at such a conclusion.

In summary, the Company has failed to support its contention that each exchange passes the threshold 50 percent test, which requires a demonstration that it serves fewer than 50 percent of households in each exchange. The Company's evidence fails in two significant respects. First, it improperly manipulates data in the Cook, Tofte, and Grand Marais exchanges, where it fails to meet the standard using the methodology that is standard for the other exchanges in this docket. Second, it improperly excludes identified small business lines affected by the change in regulatory treatment in this docket. This results in the following list of exchanges that should be rejected for failure to

⁴⁷ Mike Hughlett, *CenturyLink, Minnesota's Heir to Old Bell System, Wants to Be Freed from State Oversight*, Star Trib., Aug. 26, 2016.

meet the 50 percent market share standard: Coleraine, Comstock, Cook, Grand Marais, Pine City, Silver Bay, Swanville, Tofte, and Biwabik.

CenturyLink has also presented faulty data in support of the second requirement, which requires choice for at least 60 percent of households. First, it included wireline providers who do not meet the statutory definition of competitive service provider, which has an ownership component *and* a requirement that it be able to deliver service to a majority of households. Second, the Company improperly aggregated providers in order to reach the 60 percent threshold. Both the statutory language and policy considerations prohibit aggregation. Without aggregation, the number of exchanges that fail to meet the 60 percent standard for wireline providers almost doubles, from 24 to 39 exchanges. The distortions created by the Company's decisions here require the Commission to disregard entirely the Company's support for wireline competition in this docket. The Commission must make its determination for the 60 percent test based solely on the wireless data provided by the Company.

Finally, there has been a limited opportunity for public participation in this docket, despite strong indications from other sources that the public is interested in the outcome of this proceeding. It is probable that the low customer engagement was exacerbated by the insufficient notice provided by the Company. In addition, although the Commission extended the comment period deadline, the Company's notice listed an earlier date, which is likely to have discouraged customers from commenting after March 9. These are reasons for the Commission to require robust customer notice with the opportunity for other parties to review if any exchanges are approved.

Dated: March 23, 2017

Respectfully submitted,

LORI SWANSON
Attorney General
State of Minnesota

s/ **Joseph A. Dammel**

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ATTORNEYS FOR OFFICE OF THE
ATTORNEY GENERAL-RESIDENTIAL
UTILITIES AND ANTITRUST DIVISION

Appendix A

Wire Centers with Fewer than 50 Percent Cable Availability⁴⁸

1. Comstock
2. Finland
3. Glenville
4. Jackson
5. Nicollet
6. Swanville
7. Tofte
8. Windom
9. Island Lake
10. Marble
11. Keewatin
12. Buhl
13. Ogilvie
14. Barnum
15. Cass Lake
16. Carlton
17. Mora
18. Cook
19. Braham
20. Royalton
21. Bemidji
22. Hinckley
23. Princeton
24. Biwabik
25. Holdingford
26. Coleraine
27. Duluth Pike Lake
28. Rush City
29. Pine City
30. Grand Marais
31. Foley

⁴⁸ Aff. of AI Lubeck at AL-4.

Appendix B

A	B	C	D	E	F	G	H	I	J	L	K	M
									D+F+H	E+G+I	J/C	L/C
Wire Center	Exchange Service Area	Total Households	Households with Cable & Other Wireline Available	Greater than 50%	Households with Only Cable Voice Available	Greater than 50%	Households with Only Other Wireline Voice Available	Greater than 50%	Households with Cable or Other Wireline Voice	Corrected HHs with eligible CSPs	% Households with Cable or Other Wireline Availability	Corrected %
ALBERT LEA	ALBERT LEA	8,725	3,688	0	4,259	0	625	0	8,572	0	98%	0%
BEMIDJI	BEMIDJI	11,812	2,291	0	2,409	0	4,205	0	8,905	0	75%	0%
BRAHAM	BRAHAM	2,456		0	741	0		0	741	0	30%	0%
BARNUM	BARNUM	1,379		0	203	0	1	0	204	0	15%	0%
BATTLE LAKE	BATTLE LAKE	1,409	501	0	452	0	308	0	1,261	0	89%	0%
BUHL	BUHL	747		0	75	0		0	75	0	10%	0%
BIWABIK	BIWABIK	1,213	35	0	464	0	5	0	504	0	42%	0%
BASS BROOK(COHASSET)	BASS BROOK(COHASSET)	1,374	341	0	471	0	530	0	1,342	0	98%	0%
COLERAINE	COLERAINE	2,200	252	0	684	0	430	0	1,366	0	62%	0%
COMSTOCK	COMSTOCK	156		0		0	13	0	13	0	8%	0%
COOK	COOK	1,030		0	304	0	16	0	320	0	31%	0%
CARLTON	CARLTON	1,631		0	464	0		0	464	0	28%	0%
DULUTH PIKE LAKE	DULUTH	4,616		0	2,067	0	1	0	2,068	0	45%	0%
DETROIT LAKES	DETROIT LAKES	7,305	2,962	0	3,340	0	380	0	6,682	0	91%	0%
FOLEY	FOLEY	2,042		0	991	0	154	0	1,145	0	56%	0%
HOLDINGFORD	HOLDINGFORD	930	53	0	330	0	189	0	572	0	62%	0%
HINCKLEY	HINCKLEY	2,054		0	833	0		0	833	0	41%	0%
ISLAND LAKE	DULUTH	1,656		0	15	0		0	15	0	1%	0%
KEEWATIN	KEEWATIN	518		0	39	0		0	39	0	8%	0%
MAHNOMEN	MAHNOMEN	1,428	422	0	342	0	111	0	875	0	61%	0%
MORA	MORA	4,813		0	1,396	0	41	0	1,437	0	30%	0%
MARBLE	MARBLE	687		0	49	0	8	0	57	0	8%	0%
OGILVIE	OGILVIE	948		0	130	0	52	0	182	0	19%	0%
OWATONNA	OWATONNA	12,285	5,823	0	4,482	0	350	0	10,655	0	87%	0%
PARK RAPIDS	PARK RAPIDS	4,869	601	0	2,423	0	1,650	0	4,674	0	96%	0%
PINE CITY	PINE CITY	3,873		0	1,846	0		0	1,846	0	48%	0%
PRINCETON	PRINCETON	6,858	579	0	2,218	0	382	0	3,179	0	46%	0%
RUSH CITY	RUSH CITY	1,947		0	912	0		0	912	0	47%	0%
ROYALTON	ROYALTON	1,327	5	0	442	0	107	0	554	0	42%	0%
STAPLES	STAPLES	2,412	68	0	1,201	0	242	0	1,511	0	63%	0%
SWANVILLE	SWANVILLE	426		0		0	61	0	61	0	14%	0%
SANDSTONE	SANDSTONE	1,337	7	0	675	675	66	0	748	675	56%	50%
SABIN	SABIN	658		0	337	337	93	0	430	337	65%	51%
GRAND MARAIS	GRAND MARAIS	1,463	705	0		0	750	750	1,455	750	99%	51%
ISANTI	ISANTI	5,183		0	2,775	2775	75	0	2,850	2775	55%	54%
ST CHARLES	ST CHARLES	2,619	283	0	1,479	1479	137	0	1,899	1479	73%	56%
NASHWAUK	NASHWAUK	1,465		0	835	835	4	0	839	835	57%	57%
CAMBRIDGE	CAMBRIDGE	6,200	5	0	3,541	3541		0	3,546	3541	57%	57%
ST PETER	ST PETER	5,798	3,324	3324	1,132	0	197	0	4,653	3324	80%	57%

Exchange identified in OAG Initial Brief, Table 1

Modified from data contained in Exhibit AL-10



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March 23, 2017

Mr. Daniel Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of the Petition of CenturyLink QC to be Regulated Pursuant to Minn. Stat. § 237.05; Competitive Market Regulation
Docket No. P421/AM-16-496**

**Repository for “Highly Sensitive Protected Data” subject to additional protection in
Docket 16-496 (In the Matter of the Petition of CenturyLink QC to be Regulated
Pursuant to Minn. Stat. § 237.025 Competitive Market Regulation)
Docket No. P-421/AM-16-547**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find *Reply Brief of the Office of the Attorney General*. The OAG continues to recommend that the findings contained in the March 9, 2017 *Proposed Findings and Conclusions* be adopted by the Commission; thus no amendments to that document are necessary at this time.

By copy of this letter, all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Joseph A. Dammel**

JOSEPH A. DAMMEL

Assistant Attorney General

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Enclosures

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Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	Yes	OFF_SL_16-496_Official CC Service List
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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_16-496_Official CC Service List
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Jeremy	Kissel	regulatory@globalcapacity.com	GC Pivotal, LLC	180 North LaSalle Street Suite 2430 Chicago, Illinois 60601	Electronic Service	No	OFF_SL_16-496_Official CC Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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James W.	Lienau		New-Cell, Inc.	PO Box 19079 450 Security Blvd. Green Bay, WI 543079079	Paper Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Lindell	john.lindell@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_16-496_Official CC Service List
Colleen	Lockett	regulatory@intrado.com	Intrado Communications Inc.	1601 Dry Creek Dr. Longmont, CO 80503	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Mary	Lohnes	mary_lohnes@mml.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Greg	Lohrenz	gregl@aitech.net	Advanced Integrated Technologies	9855 W 78th St Ste 300 Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Timothy	Loken	Tim.P.Loken@windstream.com	Windstream Communications, Inc.	4001 N Rodney Perham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Robert W.	McCausland	robert.mccausland@h3net.com	Hypercube Telecom, LLC	3200 W Pleasant Run Rd Ste 300 Lancaster, TX 75146	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Brian	McClintock	BMcClintock@tncii.com	TNCI Operating Company LLC	114 E Haley St Ste I Santa Barbara, CA 93101	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Laurie	McDonough	laurie.mcdonough@acninc.com	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Electronic Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	McIntyre	brian.mcintyre@dish.com	dishNET Wireline L.L.C.	9601 S. Meridian Blvd Englewood, CO 80112-5905	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Karin	Medlin	BADEMAIL- karin.e.gray@sprint.com	Sprint Spectrum L.P.	6360 Sprint Parkway Mail Stop: KSOPHE01 1D412 Overland Park, KS 66251	Paper Service	No	OFF_SL_16-496_Official CC Service List
Anthony	Mendoza	tony@mendozalawoffice.com	Mendoza Law Office, LLC	1000 University Ave Ste 222 Saint Paul, MN 55104	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Stephen	Meradith	Stephen.Meradith@windstream.com	Windstream	655 W. Broadway, Ste. 850 San Diego, CA 92101	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Michael R.	Moore	michael.moore@charter.com	Charter Communications, Inc.	12405 Powerscourt Dr St. Louis, MO 63131	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Lance	Murphy	lance.murphy@verizonwireless.com	Verizon Wireless	24242 Northwestern Hwy Southfield, MI 48075	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Glen	Nelson	regulatory@nhcgrp.com	New Horizons Communications Corp.	420 Bedford St Ste 250 Lexington, MA 02420	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Lyndall	Nipps	WCI.Minnesota.govaffairs@windstream.com	McLeodUSA Telecommunications Services, LLC	655 W. Broadway Suite 850 San Diego, CA 92101	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Steve	Nisbet	snisbet@whe.org	WH Link	P.O. Box 330 6800 Electric Drive Rockford, MN 553730330	Electronic Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jerry	Nussbaum	preferred@aol.com	Preferred Long Distance, Inc.	Suite 350 16830 Ventura Boulevard Encino, CA 91436	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Matt	O'Flaherty	oflaherty.matt@gmail.com	SelecTel, Inc.	1825 N Bell St Freemont, NE 68025	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Dan	Olsen	dano@windom-mn.com	City of Windom	444 9th St Windom, MN 56101-0038	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Mike	Orcutt	mgorcutt@nttservices.com	Nebraska Technology & Telecommunications, In.	2308 S. 156 Circle Omaha, NE 68130	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Doug	Osborne	dosborne@localaccessllc.com	Local Access LLC	11442 Lake Butler Blvd Windermere, FL 34786	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Sheila	Paananen	sp1484@att.com	AT&T National Access Management	26019 NE 34th St Redmond, WA 98053	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	Yes	OFF_SL_16-496_Official CC Service List
Becky	Parker	bparker@nextera.net	Nextera Communications, LLC	7115 Forthun Rd Suite 100 Baxter, MN 56425	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Mark	Pavol	regulatory@ymaxcorp.com	YMAX Communications Corp.	PO BOX 6785 West Palm Beach, FL 33404-6785	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Dan	Pecarina	dpecarina@exchange.hbcicom	Hiawatha Broadband Communications, Inc	58 Johnson St Winona, MN 55987	Electronic Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rochelle	Pervisky	RPervisky@exchange.hbci.com	Hiawatha Broadband	58 Johnson Street Winona, MN 55987	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_16-496_Official CC Service List
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Patrick	Phipps	regulatory@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, Suite 2730 Chicago, IL 60606	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Lauren	Predmore	lpredmore@mediacomcc.com	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way Mediacom Park, NY 10918	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Lisa	Purcell	lpurcell@lightedge.com	LH Telecom, Inc.	215 10th St Ste 1000 Des Moines, IA 50309	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Brian	Rankin	brian_rankin@comcast.com	Comcast Cable Communications	1701 John F Kennedy Blvd FL 55 Philadelphia, PA 19103	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Haran	Rashes	hrashes@clearrate.com	Clear Rate Communications, Inc.	Clear Rate Communications, Inc. 555 S. Old Woodward, Suite 600 Birmingham, MI 48009	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	Rhoden	jrhoden@mind.net	Prime Time Ventures, LLC	Suite 202 210 West 8th Street Medford, OR 97501	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Carrie	Rice	carrie.rice@consolidated.com	Consolidated Communications Enterprise Services, Inc.	221 E Hickory St Mankato, MN 56001-3610	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Robert S	Rife	grodham@diversifiedconsulting.net	Broadband Dynamics, LLC	8757 E Via De Commercio FL 1 Scottsdale, AZ 85258-3359	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Emily	Roberts	emily.roberts@windstream.com	PAETEC Business Services	c/o Windstream 1450 N Center Point Rd Hiawatha, IA 52233	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Natalia	Rodrigues	nrodrigues@wcs.com	Wholesale Carrier Services, Inc.	5471 N. University Drive Coral Springs, FL 33067	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Michael	Ruziska	regulatory@entelegent.com	EnTelegent Solutions, Inc.	3800 Arco Corporate Drive Suite 310 Charlotte, NC 28273	Electronic Service	No	OFF_SL_16-496_Official CC Service List
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Dave	Schultz	dschultz@paulbunyan.net	Paul Bunyan Telephone	1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_16-496_Official CC Service List
Michael	Shultz	michael.shultz@consolidated.com	Consolidated Communications	350 S Loop 336 W Conroe, TX 77304-3308	Electronic Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cathy	Shuman	cathy.shuman@ci.monticello.mn.us	FiberNet Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Richard	Sjoberg	rsjoberg@mncable.net	Sjoberg'S, Inc.	315 North Main Street Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Cathie	Skuzacek	skuzace@stolaf.edu	St. Olaf College	1520 St Olaf Ave Northfield, MN 55057	Electronic Service	No	OFF_SL_16-496_Official CC Service List
David	Skogen	dskogen@gcioa.com	Global Connection Inc. of America	5555 Oakbrook Pkwy Ste 620 Norcross, GA 30093	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Jeff	Slater	jeff.slater@rclec.com	RCLEC, Inc.	20 Davis Dr Belmont, CA 94002	Electronic Service	No	OFF_SL_16-496_Official CC Service List
David J.	Smat	regulatory@ingts.com	iNetworks Group, Inc.	Suite 2510 125 S. Wacker Drive Chicago, IL 60606	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Anna	Sokolin Maimon	amaimon@mediacomcc.com	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way Mediacom Park, NY 10918	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Chris	Staton	cstaton@pipertel.com	Pipertel Communications, LLC	9580 W. 14th Avenue Suite 100 Lakewood, CO 80215	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Keith	Stubbe	tunesrus@iw.net	Southwest Minnesota Broadband Services	PO BOX 1006 Lakefield, MN 56150	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Scott	Terry	scott.a.terry@windstream.com	Windstream Lakedale, Inc.	4001 Rodney Parham Rd B1-F02-1221A Little Rock, AR 72212	Electronic Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Shirley	Thomas	shirley.thomas@orange.com	France Telecom Corporate Solutions L.L.C.	13775 McLearen Road Oak Hill, VA 20171	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Elena	Thomasson	elena.thomasson@birch.com	Cbeyond Communications, LLC dba Birch	3060 Peachtree Rd Suite 1065 Atlanta, GA 30305	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Claudia	Tiger	ctiger@bcntele.com	BCN Telecom, Inc.	1200 Mt. Kemble Ave. 3rd Fl. Harding Township, NJ 07960	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Brad	VanLeur	bvanleur@orbitcominc.net	OrbitCom, Inc.	1701 North Louise Avenue Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Nancy A.	Vogel	nancy_vogel@mimi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Evelynn	Vu	evelynn.vu@ringcentral.com	RCLEC, Inc.	20 Davis Dr Belmont, CA 94002	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Jim	Walter	jwalter@702communications.com	VAL-ED Joint Venture, LLP	DbA 702 Communications 702 Main Avenue Moorhead, MN 56560	Electronic Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jared	Welch	jared.welch@accesspointinc.com	Access Point, Inc.	1100 Crescent Green Ste 109 Cary, NC 27518	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Karly	Werner	karly_werner@cable.comcast.com	Comcast Phone of Minnesota, Inc.	10 River Park Plaza St. Paul, MN 55107	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Doyca	Wickham	doyca.wickham@voldelta.com	LSSI Data Corp.	1600 Stewart Ave. Suite 305 Westbury, NY 11590	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Karrie	Willis	BADEMAIL-kwillis@popp.com	POPP.com, Inc.	620 Mendelssohn Ave N Golden Valley, MN 55427	Paper Service	No	OFF_SL_16-496_Official CC Service List
Kristi	Woldt	N/A	Airadigm Communications, Inc.	Suite 50B 100 West College Avenue Appleton, WI 54911	Paper Service	No	OFF_SL_16-496_Official CC Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-496_Official CC Service List
Brian	Worthen	bworthen@mammothnetworks.com	InTTec, Inc.	1001 South Douglas Highway Box 2799 Gillette, WY 82717	Electronic Service	No	OFF_SL_16-496_Official CC Service List
Anita	Yokiel	regulatory@hickorytech.com	Consolidated Communications	221 E Hickory Street PO Box 3248 Mankato, Minnesota 56001	Electronic Service	No	OFF_SL_16-496_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher P	Yost	christopher.yost@zayo.com	Communications Infrastructure Investments, LLC	C/O Zayo Group 1805 29th St Boulder, CO 80301	Electronic Service	No	OFF_SL_16-496_Official CC Service List