

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

Beverly Jones Heydinger	Chair
Dr. David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

In the Matter of a Rulemaking to Consider DOCKET NO. P-999/R-14-413
Possible Amendments to Minnesota Rules,
parts 7810.4100 through 7810.6100

**COMMENTS OF THE OFFICE OF THE
ATTORNEY GENERAL – RESIDENTIAL
UTILITIES AND ANTITRUST DIVISION**

The Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) respectfully submits its Comments in the matter of a Rulemaking to Consider Possible Amendments to Minnesota Rules parts 7810.4100 through 7810.6100. While the OAG is not opposed to the concept of modernizing the service quality rules to eliminate antiquated language or improving clarity, it recommends that the Commission not repeal or otherwise rollback substantive elements of the rules because they provide important protections for consumers.

I. INTRODUCTION

On March 26, 2014, CenturyLink, Inc. (“CenturyLink”) filed a Petition for Waiver from Minnesota Rule part 7810.5800 and a Request for Rulemaking to Modernize Service Quality Rules. In Docket Number P-421/AM-14-255, the Commission denied CenturyLink’s request for a waiver from Rule 7810.5800.¹ In Docket Number P-421/AM-14-256, the Commission granted

¹ Order Denying Variance Request, *In the Matter of the Petition of CenturyLink Inc. for a Variance to Minnesota Rules, part 7810.5800*, Docket No. P.421/AM-14-255 (Aug.11, 2014). The Commission also denied CenturyLink’s request for reconsideration on the waiver. Order Denying Reconsideration, *In the Matter of the Petition of CenturyLink Inc. for a Variance to Minnesota Rules, part 7810.5800*, Docket No. P.421/AM-14-255 (Oct. 10, 2014).

CenturyLink's request and initiated a rulemaking proceeding to "consider possible changes" to Minnesota Rules parts 7810.4100 through 7810.6100.² On August 4, 2014, the Commission issued a Request for Comments regarding the rulemaking. The Commission's Request for Comments indicated that "anyone requesting rule changes that would eliminate or reduce current service quality standards" would, at minimum, be required to provide the following information:

1. Provide evidence of competition, including the level and scope of such competition in relation to different types of customers (large business, small business, residential, etc.) and geography, and the extent to which existing competition supports the rule changes being recommended. Such evidence and analysis should, at a minimum, reflect or be guided by the following:

a. Any market-power analysis should, at a minimum, address the analysis set forth in: (i) *Horizontal Merger Guidelines*, U.S. Department of Justice and Federal Trade Commission, August 19, 2010; and (ii) Memorandum Opinion and Order, *Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Phoenix, Arizona Metropolitan Statistical Area*. Federal Communications Commission, WC Docket No. 09-135, June 22, 2010.

b. Commenters should provide evidence of whether wireless service is a substitute for and/or a complement to wireline local service in each relevant market and, if so, to what extent.

c. Relevant markets should, at a minimum, reflect (i) different customer segments, including but not necessarily limited to residential, small business (1-3 lines, suggested), medium business (4-200 lines, suggested) and large business (over 200 lines, suggested); and (ii) different geographic areas where customers face the same choice of competitive services (in some cases this may require defining the market at a level less than that covered by a wire center -for example where cable is offered in an urban area but not in the rural portion of the wire center).

² Order Detailing Disposition of Petition and Initiating Rulemaking Proceeding, *In the Matter of the CenturyLink, Inc. Petition for Rulemaking to Revise Service Quality Rules*, Docket No. P-421/AM-14-256 (May 22, 2014).

d. Relevant substitutes for traditional landline service should exclude services provided by carriers affiliated with the traditional landline service provider.

2. Provide proposed language for each rule change sought, and for each rule change provide:

a. A demonstration of how the recommended rule change would impact retail service quality and the extent to which service quality would be adequately protected by competition and/or the recommended rule change;

b. An analysis of how the change would, if at all, maintain or improve service quality;

c. An analysis and evidence of the impact any recommended change would potentially have on competition, local exchange carriers and wholesale service quality;

d. Any other relevant evidence, analysis and argument supporting any recommended rule change and the impact of such change on telecommunications consumers;

3. Provide arguments or evidence as to why rule changes should or should not be made regardless of evidence related to competition.³

In its initial Petition, CenturyLink identified two primary reasons for the Commission to consider a rulemaking for Minnesota Rules, parts 7810.4100 through 7810.6100 (“Service Quality Rules” or “Rules”). CenturyLink first suggests that some of the Service Quality Rules are outdated and that some of the Rules could be eliminated or updated to reflect modern realities. For example, CenturyLink highlights Rule 7810.5100, which requires telephone operators to be “courteous, considerate and efficient.” While some telephone operators still exist, they are no longer required to physically connect every call. The OAG does not object to

³ Request for Comments, *In the Matter of a Rulemaking to Consider Possible Amendments to Minnesota Rules, parts 7810.4100 through 7810.6100*, Docket No. P-999/R-14-413 (Aug. 4, 2014).

the concept of modernizing the Service Quality Rules to eliminate antiquated language or improve clarity, as long as it is done carefully to ensure that no consumer protections are lost.

The OAG does object to CenturyLink's suggestion that the substantive Service Quality Rules should be repealed or otherwise rolled back.⁴ The Service Quality Rules exist to ensure that all Minnesota consumers have reliable access to high quality wireline service,⁵ which is a basic public necessity. The Commission should not reduce or repeal any of the Service Quality Rules because they are vital to ensuring that CenturyLink and other telecommunications companies have an incentive to provide high quality wireline service at a reasonable cost in the absence of competitive market pressures.

II. THE SERVICE QUALITY RULES PROVIDE IMPORTANT PROTECTIONS FOR CONSUMERS.

The Service Quality Rules ensure that consumers in Minnesota can enjoy high quality, low cost telephone service in the absence of effective competition. CenturyLink characterizes the Rules as “outdated” and “obsolete,”⁶ but it also acknowledges that the Service Quality Rules affect the level of service it provides to its customers; therefore, without the Rules the quality of CenturyLink's service would likely be degraded.

⁴ Notably, CenturyLink will not benefit even if the Service Quality Rules are repealed or modified because it is not currently regulated by the Rules. Instead, CenturyLink will be regulated by an Alternative Form of Regulation plan (“AFOR”) until December 31, 2016, and in particular the Retail Service Quality Plan contained in the AFOR. *See* Order Approving Extension of Second Revised Alternative Form of Regulation Plan, *In the Matter of Extending CenturyLink's Second Revised Alternative Form of Regulation Plan*, Docket No. P-421/AR-13-498 (Nov. 20, 2013).

⁵ The term “wireline service” is used herein to refer to the landline telephone service offered by CenturyLink as an incumbent local exchange carrier. The term is not intended to encompass telephone service offered by wireless telephone providers—which will be referred to as “wireless service”—or that offered by facilities-based Voice over Internet Protocol telephone providers—which will be referred to as “VoIP service.”

⁶ Petition for Waiver of Minnesota Rule Part 7810.5800 and Request for Rulemaking to Modernize Service Quality Rules, *In the Matter of the CenturyLink, Inc. Petition for Rulemaking to Revise Service Quality Rules*, at 1, 3, Docket No. P-421/AM-14-256 (March 26, 2014).

For example, CenturyLink complains of Rule 7810.5800, which controls interruptions to service. Rule 7810.5800 requires telephone utilities to “clear 95 percent of all out-of-service troubles within 24 hours.” CenturyLink claims that meeting this requirement imposes an excessive burden because it would prefer to repair broadband internet service before repairing wireline phone service.⁷ CenturyLink’s argument is itself an argument for retaining the Service Quality Rules: without Rule 7810.5800, CenturyLink would take longer to repair outages for telephone customers. Many people rely on wireline phone service as their primary connection to the outside world. Even more importantly, for some people the wireline phone system may be their only way to call for help in the case of an emergency. It is easy to imagine an isolated rural consumer in Minnesota whose only method of communication is through a wireline telephone; Rule 7810.5800 exists because it is just as easy to imagine CenturyLink making a business decision that repairing an outage for an isolated rural consumer is a lower priority than restoring lucrative broadband connections for business customers. Because of Rule 7810.5800, consumers in Minnesota, including our isolated rural customer, can expect to have outages repaired within 24 hours in the vast majority of circumstances.

The other Service Quality Rules that CenturyLink would have repealed also provide valuable protections for consumers. For example, Rule 7810.5200 requires CenturyLink and other telephone utilities to ensure that calls are answered within ten seconds 95 percent of the time. Rule 7810.5300 requires that consumers receive a dial tone within three seconds on 95 percent of calls. Rule 7180.5550 requires CenturyLink and other utilities to make sure that they have sufficient facilities to provide “adequate” transmission at appropriate volume levels and without distortion, noise, or cross talk. These Rules form the foundational standards of

⁷ *Id.* at 5.

telephone service. By seeking to initiate the current proceedings, CenturyLink is essentially stating that it no longer desires to meet these basic requirements. Put differently, if the Rules are repealed, consumers will no longer be able to expect that CenturyLink will connect their call in a reasonable amount of time or that their calls will be free of interference.

But this is why the Service Quality Rules exist. The Service Quality Rules are the reason that everyday consumers are not concerned about whether the wireline telephone system will work correctly. The Rules ensure that the system works, and without them CenturyLink will not have sufficient incentive to continue the level of service that is required for a basic necessity like telephone service.

III. CENTURLINK MUST MEET A HIGH BURDEN TO PROVE THAT THERE IS EFFECTIVE COMPETITION AMONG DIFFERENT TELEPHONE SERVICES.

The underlying premise of CenturyLink's request that the Commission rollback its Service Quality Rules is that it faces effective competition from rivals providing equivalent telephone service. This alleged competition, CenturyLink argues, will force it to maintain the quality of its wireline telephone service, and renders the Rules superfluous. But this claim is at best conjecture at present, and at worst displays a fundamental misunderstanding of antitrust law. And absent sufficient evidence of effective competition, any rollback of the Service Quality Rules will leave consumers at the mercy of a monopolist who has no incentive—regulatory or economic—to maintain adequate service quality.

A. EFFECTIVE COMPETITION REQUIRES DEMAND SUBSTITUTABILITY BETWEEN PRODUCTS OR SERVICES SUFFICIENT TO CONSTRAIN ANTICOMPETITIVE CONDUCT, AND MERE FUNCTIONAL SUBSTITUTABILITY WILL NOT SUFFICE.

The general standard to evaluate whether effective competition exists between two products or services⁸ is well developed in antitrust law: “The extent to which one market prevents exploitation of another market depends on the extent to which consumers will change their consumption of one product in response to a price change in another, *i.e.*, the ‘cross-elasticity of demand.’”⁹ The appropriate inquiry thus focuses on the change in consumer demand—often described in terms of the reasonable “substitutability”¹⁰ or “interchangeability”¹¹ of one product with another—in evaluating whether products compete.

Inherent in the focus on demand substitutability is that mere *functional* substitutability is not sufficient for one product to act as a competitive constraint on another. A car and a horse can both take a person from one place to another, but few people would replace a car with a horse as their primary means of transportation, despite their functional substitutability. Similarly, while cellular telephones and wireline telephones both allow a consumer to make a phone call, just because the products provide functional substitutability does not indicate that the products compete with one another.

Applied here, these principles place the burden on CenturyLink to demonstrate that its wireline customers are willing and able to substitute wireless or VoIP service if the

⁸ For simplicity’s sake, hereafter only the term “product” and “product market” will be used when discussing antitrust law principles. In general, the same principles apply to the sale and purchase of services as well.

⁹ *Eastman Kodak Co. v. Image Technical Servs., Inc.*, 504 U.S. 451, 469 (1992).

¹⁰ *Nat’l Collegiate Athletic Ass’n v. Bd. of Regents of Univ. of Oklahoma*, 468 U.S. 85, 111 (1984) (stating that “the correct test for determining whether [the product] constitute[s] a separate market...[is] whether there are other products that are reasonably substitutable”).

¹¹ *United States v. E. I. du Pont de Nemours & Co.*, 351 U.S. 377, 404 (1956) (stating that the “market is composed of products that have reasonable interchangeability”).

circumstances warrant. Unless it can make this threshold showing, CenturyLink’s request that the Commission rollback its Service Quality Rules based on the alleged competition it faces from providers of wireless and VoIP telephone service is nothing more than a myth.

B. GOODS AND SERVICES ARE NOT REASONABLY INTERCHANGEABLE, AND THEREFORE WILL NOT CONSTRAIN THE ACTIONS OF THE SELLER, UNLESS THEY SHARE THE SAME “PRODUCT MARKET” AND “GEOGRAPHIC MARKET.”

The U.S. Department of Justice (“DOJ”) and Federal Trade Commission’s (“FTC”) *Horizontal Merger Guidelines* state that “[m]arket definition focuses solely on demand substitution factors, i.e., customers’ ability and willingness to substitute away from one product to another in response to a price increase or a corresponding non-price change such as a reduction in product quality or service.”¹² Market definition inquiries involve two separate but equally important determinations: whether the products at issue share the same “product market” and “geographic market.”¹³

1. Appropriately defining a “product market.”

“The basic relevant product market test is ‘reasonable interchangeability.’ Interchangeability may be measured by, and is substantially synonymous with, cross-elasticity. A market is *elastic* if demand goes down as price goes up. A market is *cross-elastic* if rising prices for product A cause consumers to switch to product B.”¹⁴ The DOJ and FTC often use what is known as the “hypothetical monopolist test” to help delineate the appropriate boundaries

¹² United States Department of Justice & Federal Trade Commission, *Horizontal Merger Guidelines* at 7 (Aug. 19, 2010) (hereafter “*Merger Guidelines*”).

¹³ *Merger Guidelines* at 8-14 (separately discussing how to define a product market and geographic market); *see also, e.g., Bailey v. Allgas, Inc.*, 284 F.3d 1237, 1246 (11th Cir. 2002) (“Defining the relevant market requires identification of both the product at issue and the geographic market for that product.”).

¹⁴ *Telecor Commc’ns, Inc. v. Sw. Bell Tel. Co.*, 305 F.3d 1124, 1131 (10th Cir. 2002) (italics original); *see also, e.g., Brown Shoe Co. v. United States*, 370 U.S. 294, 325 (1962) (“The outer boundaries of a product market are determined by the reasonable interchangeability of use or the cross-elasticity of demand between the product itself and substitutes for it.”).

of a product market.¹⁵ Using this test, one asks whether a hypothetical profit-maximizing firm that is the only present and future seller of a product could profitably impose a small but significant non-transitory increase in price (“SSNIP”) for the product.¹⁶ If the hypothetical monopolist could successfully impose a SSNIP, there are no reasonably interchangeable alternative products that consumers would substitute to defeat the price increase (i.e., there are no competing products). If enough consumers would substitute a different product in response to a SSNIP to make the price increase unprofitable, then that substitute product should be included in the candidate product market.

The Federal Communications Commission (“FCC”) applied precisely this methodology to telecommunications markets in its *Phoenix Forbearance Order*.¹⁷ In evaluating whether wireline service competes with wireless service for the purposes of evaluating Qwest’s¹⁸ petition that it waive certain regulatory requirements, the FCC explained how the *Merger Guidelines* dictate that it “consider whether there are a sufficient number of wireline service customers who, in response to a price increase in wireline local access service, would stop subscribing to their wireline service and instead rely exclusively on mobile wireless service, so as to render the price increase unprofitable.”¹⁹

¹⁵ See *Merger Guidelines* at 8-10.

¹⁶ See *id.* at 9.

¹⁷ *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Phoenix, Arizona Metropolitan Statistical Area*, WC Docket No. 09-135, FCC 10-133, ¶¶ 51-63 (Jun. 22, 2010) (hereafter “*Phoenix Forbearance Order*”). The 10th Circuit Court of Appeals affirmed the *Phoenix Forbearance Order* on appeal. See *Qwest Corporation v. Federal Communications Commission*, 689 F.3d 1214 (10th Cir. 2012).

¹⁸ Qwest changed its name to CenturyLink following a merger in 2011.

¹⁹ *Phoenix Forbearance Order* ¶ 56.

Here, pursuant to the Commission’s order, the burden is on CenturyLink to provide sufficient, economically sound evidence that, if it imposed a SSNIP or reduced the resources used to maintain wireline service quality, this would cause a sufficient number of customers to switch to other telephone providers to make the practice unprofitable. Absent such evidence, there is no basis upon which to conclude that other types of telephone service occupy the same product market as wireline service, and therefore compete with it.

2. Appropriately defining a “geographic market.”

Even if two products are part of the same product market, they also must share the same geographic market to competitively constrain one another. A geographic market for antitrust purposes is “the area of effective competition . . . in which the seller operates, and to which the purchaser can practicably turn for supplies.”²⁰ More simply, if a consumer is not reasonably able to turn to another seller of a product then the two sellers are not competing for the consumer’s business even if they are selling the exact same product.²¹

Geographic markets can be local, regional, or national in nature,²² and “determining the relevant geographic market is a fact-intensive exercise centered on the commercial realities of the market and competition.”²³ Here, defining the appropriate geographic market focuses on where, if anywhere, customers residing in CenturyLink’s wireline service territory can reasonably turn to purchase satisfactory alternative telephone service from a different provider.

²⁰ *Tampa Elec. Co. v. Nashville Coal Co.*, 365 U.S. 320, 327 (1961).

²¹ To provide a stark example of sellers of identical products located in different geographic markets, a gas station in Duluth does not compete with a gas station in St. Paul because a consumer cannot practicably substitute the gas sold at the Duluth station even if the St. Paul station drastically increased its per gallon price.

²² See *Brown Shoe*, 370 U.S. at 337.

²³ *E.I. du Pont de Nemours & Co. v. Kolon Indus., Inc.*, 637 F.3d 435, 442 (4th Cir. 2011).

Again, pursuant to the Commission's order it is CenturyLink's duty to provide sufficient, economically sound evidence to establish a well-defined geographic market.

C. SUBSTANTIAL AUTHORITY SUGGESTS THAT WIRELESS SERVICE DOES NOT COMPETE WITH WIRELINE SERVICE BECAUSE THEY OCCUPY DIFFERENT "PRODUCT MARKETS."

To date, the literature discussing whether wireless and wireline service share the same product market for antitrust purposes has generally concluded that they do not, notwithstanding the increasing number of "cord cutters" that rely exclusively on wireless service.

In its *Phoenix Forbearance Order*, the FCC found that Qwest had not provided sufficient evidence that wireless service was in the same product market as wireline service, i.e., that the two services competed in an antitrust sense.²⁴ The FCC further discussed why statistics establishing that a large number of "cord cutters" were present in a given area do not prove effective competition. As the FCC explained in the order, such statistics provide no insight into whether wireless service has a price-constraining effect on wireline service:

Qwest submitted studies that estimate the percentage of households that exclusively rely upon mobile wireless services in the Phoenix area, which cannot alone establish whether mobile wireless services should be included in the same relevant product market as residential wireline voice service. Knowing the percentage of households that rely exclusively upon mobile wireless is insufficient to determine whether mobile wireless services have a price-constraining effect on wireline access services. Moreover, . . . other reasons may explain the growth in the number of wireless-only customers, besides an increasing cross-elasticity of demand between mobile wireless and wireline services. For example, nationwide statistics published by the CDC suggest that the choice to rely exclusively upon mobile wireless services could be driven more by differences in consumers' age, household structure, and underlying preferences than by relative price differentials. Furthermore, . . . several classes of customers appear unlikely to drop wireline service in response to a significant price increase, including those who: (a) value the reliability and safety of wireline service; (b) value a single point of contact for multiple household members; (c) live in a household with poor wireless coverage; (d) operate a business out of their home

²⁴ *Phoenix Forbearance Order* ¶ 60.

and believe that wireline service offers better reliability and sound quality; or (e) desire a service that is more economically purchased when bundled with a local service (e.g., wireline broadband Internet service, or a video service).²⁵

The DOJ agrees with the FCC on this point. In an earlier report about the competitive conditions that exist within the telecommunications industry, the DOJ explained:

The existence of some consumers who choose to substitute wireless service for access to the landline network does not demonstrate that wireless service is an effective constraint on prices for access to landline services. That determination turns in part on the number of customers who would choose to substitute to wireless services entirely in response to a specified price increase for landline telephone service, compared with the number of customers who would choose to stay with landline and pay the additional price. The size of that wireless substitution effect is not known. However, there are reasons (discussed below) to think that wireless is not by itself an effective competitive constraint today.

...

[T]here is little evidence that landline telephone companies consider the threat of wireless substitution sufficient to change their access prices. In response to customers “cutting the cord,” a telephone company can either lower its prices to all customers to keep subscribers from switching, or leave prices where they are. A company would choose the first option if the loss of revenue from cord-cutting is expected to be greater than the loss of revenue from reducing the fees paid by customers who would not switch. If, however, the extent of wireless substitution in response to price changes is small, the company would choose not to lower prices. In fact, stand-alone landline access prices have remained relatively stable and do not appear to have declined substantially below the levels at which they are capped by regulation.

Most significantly, [a knowledgeable economist] observed that econometric analyses of the issue have not shown that wireless and landline telephone services are in the same product market, though they may be getting close. He concluded that “even though we have the vast migration of minutes, we don’t see any ability to constrain access pricing.”²⁶

²⁵ *Id.* ¶ 59 (footnotes omitted).

²⁶ United States Department of Justice, *Voice, Video and Broadband: The Changing Competitive Landscape and Its Impact on Consumers* at 65-66 (Nov. 2008).

More recently, the DOJ continued to maintain that wireless and wireline services occupied different product markets in its lawsuit that scuttled the proposed merger between AT&T Wireless and T-Mobile. The DOJ's complaint against AT&T and T-Mobile alleged:

There are no cost-effective alternatives to mobile wireless telecommunications services. Because neither fixed wireless services nor wireline services are mobile, they are not regarded by consumers of mobile wireless telecommunications services as reasonable substitutes. In the face of a small but significant price increase imposed by a hypothetical monopolist it is unlikely that a sufficient number of customers would switch some or all of their usage from mobile wireless telecommunications services to fixed wireless or wireline services such that the price increase or reduction in innovation would be unprofitable. Mobile wireless telecommunications services accordingly is a relevant product market under [applicable antitrust law].²⁷

Given these circumstances, CenturyLink bears a heavy burden to produce substantial and compelling evidence establishing that these conclusions no longer hold, that wireless service does now have a price-constraining effect on wireline service, and that the two services should be included in the same product market.

D. WIRELESS AND VOIP TELEPHONE SERVICE ARE OFFERED IN ONLY CERTAIN GEOGRAPHIC MARKETS IN MINNESOTA, AND WILL NOT ACT AS A COMPETITIVE CONSTRAINT ON CENTURYLINK IN AREAS WHERE THEY ARE UNAVAILABLE.

CenturyLink's indiscriminating claim that competition from wireless and VoIP telephone providers will deter price increases and ensure it maintains adequate service quality also suffers from significant geographic market problems. It is undisputed that VoIP providers do not offer service in all areas of Minnesota. CenturyLink customers in areas not serviced by VoIP providers are unable to substitute such service if CenturyLink raises its prices or fails to maintain adequate service quality. In short, CenturyLink faces *no* competition from VoIP providers in areas of Minnesota in which VoIP providers do not offer service.

²⁷ *United States of America v. AT&T, Inc. et al.*, No. 11-cv-01560, ¶ 12 (D.D.C. Aug. 31, 2011).

Assuming *arguendo* that wireless service is in the same product market as wireline service, similar geographic market problems exist. Thirty seconds spent reviewing Verizon's, AT&T's, T-Mobile's, or Sprint's online coverage maps reveals that there are various portions of Minnesota in which they do not offer service. CenturyLink wireline customers in these areas cannot turn to a wireless carrier for telephone service. Anyone who has traveled in outstate Minnesota can further attest that in many areas where a wireless carrier claims to have coverage that coverage is so spotty that calls are highly unreliable, if not impossible. Outstate consumers simply cannot rely on wireless providers as a substitute for CenturyLink's wireline telephone service in many geographic areas of Minnesota.

While the above circumstances belie CenturyLink's assertion that it faces effective competition from wireless and VoIP providers throughout its service territory, the magnitude of the claim's overbreadth remains an unknown. To satisfactorily establish well-defined geographic markets, CenturyLink must produce localized (e.g., zip code) data identifying the parameters of its service territory, as well as the other telephone providers that it alleges compete with it in each portion of its service territory. Such data would act as a starting point for expert analysis in gaining further insight on the troubling geographic market issues discussed above.

If CenturyLink is able to satisfy the Commission that *it* faces effective competition, another significant problem remains: rolling back the Service Quality Rules would apply to *every* provider of wireline telephone service in Minnesota. It is likely that at least some wireline telephone carriers, particularly those serving rural Minnesotans, do not face effective competition from other providers. Because eliminating or altering the Rules would apply statewide, such a step would result in at least some monopoly telephone providers that no longer have any incentive—regulatory or economic—to maintain service quality for their customers.

CenturyLink’s request that the Commission rollback its Service Quality Rules would thus likely result in some Minnesotans dealing with the anticompetitive effects of receiving service from a monopoly telephone provider, even if that monopolist is not CenturyLink. This is yet another reason for the Commission to proceed cautiously in making any substantive changes in its Service Quality Rules.

E. OLIGOPOLY MARKETS, AND IN PARTICULAR DUOPOLIES, DO NOT NECESSARILY INSULATE CONSUMERS FROM ANTICOMPETITIVE BUSINESS PRACTICES DESPITE THE NOMINAL COMPETITION THAT IS PRESENT.

Even if CenturyLink provides sufficient evidence to establish that it faces effective competition from at least one other telephone provider in a given area, this does not necessarily shield consumers from a degradation in wireline service quality if the market is oligopolistic. An “oligopoly market is one in which a few relatively large sellers account for the bulk of the output.”²⁸ “With so few sellers, oligopolists find it easier to coordinate their behavior to maintain prices above the normal competitive level. . . . Oligopolists can anticipate with greater certainty how their rivals are likely to react to a price increase. Simply by observing other firms’ conduct, oligopolists can maintain prices at high levels just as effectively as a monopolist or a group of firms engaging in an express price-fixing conspiracy.”²⁹

Those Minnesotans that do have a choice for landline telephone service provider are likely limited to two options, a form of oligopoly known as duopoly.³⁰ As a preeminent antitrust scholar has observed, “duopoly markets typically perform quite poorly. . . . Indeed, depending on

²⁸ 2B Phillip E. Areeda & Herbert Hovenkamp, *Antitrust Law* ¶ 404a (4th ed. 2014) (hereafter “Areeda & Hovenkamp”).

²⁹ Thomas A. Piraino, Jr., *Regulating Oligopoly Conduct Under the Antitrust Laws*, 89 Minn. L. Rev. 9, 9-10 (2004) (footnotes omitted).

³⁰ *FTC v. H.J. Heinz Co.*, 246 F.3d 708, 724 n.23 (D.C. Cir. 2001) (stating that “a duopoly [is] a market with only two competitors”).

assumptions, output may be no higher, and price no lower, in such a market than it is in an absolute monopoly.”³¹ The FCC recognized in its *Phoenix Forbearance Order* that duopoly markets do not necessarily mean effective competition exists among telephone providers, stating:

[Our prior analysis of competition among telephone providers] inappropriately assumed that a duopoly always constitutes effective competition and is necessarily sufficient to ensure just, reasonable, and nondiscriminatory rates and practices, and to protect consumers. The potential for supracompetitive prices may be a concern where there is a duopoly or a market dominated by a few firms and there are high barriers to entry into the market. Economists, courts, and the [FCC] have long recognized that duopolies may present significant risks of collusion and supracompetitive pricing, which can lead to significant decreases in consumer welfare. As the D.C. Circuit has stated, “[t]he combination of a concentrated market and barriers to entry is a recipe for price coordination.”

We thus find that the move from monopoly to duopoly is not alone necessarily sufficient to justify forbearance in proceedings such as this one. While duopolies may yield competitive results in certain circumstances, both theoretical and empirical studies suggest that duopolies may pose competitive concerns in other circumstances. . . .

Given the theoretical and empirical concerns with duopoly in some markets, and the experience in Omaha following the Commission’s grant of forbearance, we find it appropriate to adopt a more comprehensive analytical framework for considering forbearance requests like Qwest’s. We thus return to a traditional market power framework, which the Commission established in the Competitive Carrier proceedings and developed further in subsequent decisions, to evaluate competition in telecommunications markets in forbearance proceedings such as this one. This approach also is comparable to the analysis used by the DOJ, FTC, and telecom regulators in other countries³²

Accordingly, even if CenturyLink produces sufficient evidence of another competitor present in certain portions of its service territory, if we are left with an oligopolistic market it

³¹ 4 Areeda & Hovenkamp ¶ 911 & n.1 (3rd ed. 2009).

³² *Phoenix Forbearance Order* ¶¶ 29-37 (footnotes omitted).

must further provide an evidentiary basis to believe that the market is sufficiently competitive to incentivize it to maintain satisfactory wireline service quality.

IV. CONCLUSION

The OAG recommends that the Commission deny CenturyLink's request to repeal, or otherwise substantively rollback, any part of the Service Quality Rules.

Dated: December 4, 2014

Respectfully submitted,

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December 4, 2014

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Re: *In the Matter of a Rulemaking to Consider Possible Amendments to
Minnesota Rules, parts 7810.4100 through 7810.6100*
MPUC Docket No. P-999/R-14-413

Dear Dr. Haar:

Enclosed and e-filed in the above-referenced matter please find an updated version of the
Comments of the Office of the Attorney General – Residential Utilities and Antitrust Division

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

Sincerely,

s/Ryan Barlow

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Enclosures

cc: Affidavit of Service

AFFIDAVIT OF SERVICE

Re: *In the Matter of a Rulemaking to Consider Possible Amendments to Minnesota Rules, parts 7810.4100 through 7810.6100*
MPUC Docket No. P-999/R-14-413

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I hereby state that on December 4, 2014, I filed with eDockets *Comments of the Office of the Attorney General – Residential Utilities and Antitrust Division* and served the same upon all parties listed on the attached service list by email, and/or United States mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/ Judy Sigal
Judy Sigal

Subscribed and sworn to before me
this 4th day of December, 2014.

s/ Patricia Jotblad
Notary Public

My Commission expires: January 31, 2015.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Abbott	telecom-mgt@stolaf.edu	St. Olaf College	1520 St. Olaf Avenue Northfield, MN 55057	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jamie	Adams	jamieadams@fdlrez.com	Fond Du Lac Reservation Business Community	1720 Big Lake Road Cloquet, MN 55720	Paper Service	No	SPL_SL_14-413_Initial Notice
Registered	Agent	N/A	LSSI Data Corp.	c/o CT Corporation System, Inc. 100 So. 5th Street, Suite 1075 Minneapolis, MN 55402	Paper Service	No	SPL_SL_14-413_Initial Notice
Francis X	Ahearn	fahearn@mcgrawcom.net	McGraw Communications, Inc.	521 5th Ave Floor 14 New York, NY 10175-1200	Electronic Service	No	SPL_SL_14-413_Initial Notice
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	SPL_SL_14-413_Initial Notice
Deborah	Allison	dallison@paulbunyan.net	BI-CAP, Inc.	PO Box 579 Bemidji, MN 566010579	Paper Service	No	SPL_SL_14-413_Initial Notice
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	SPL_SL_14-413_Initial Notice
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	SPL_SL_14-413_Initial Notice
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	SPL_SL_14-413_Initial Notice
Arnie	Anderson	ArnieAnderson@MinnCAP.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Drive, Suite 202 St. Paul, MN 55103	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark J.	Angell		Angell And Associates	1075 Rosewood Drive Grapevine, TX 76051	Paper Service	No	SPL_SL_14-413_Initial Notice
Deborah S.	Arnott		IG2, Inc.	5018 196th Street Fresh Meadows, NY 113651319	Paper Service	No	SPL_SL_14-413_Initial Notice
Greg	Arvig	GARVIG@NEXTERA.NET	Nextera Communications	Suite 100 7115 Forthum Rd Baxter, MN 56425	Electronic Service	No	SPL_SL_14-413_Initial Notice
Issa	Asad	N/A	Q Link Wireless LLC	499 E Sheridan St Ste 300 Dania Beach, FL 33004	Paper Service	No	SPL_SL_14-413_Initial Notice
Merton	Auger	merton.auger@ci.buffalo.mn.us	City Of Buffalo	212 Central Avenue Buffalo, MN 55313	Electronic Service	No	SPL_SL_14-413_Initial Notice
Roger	Avelsgard	ravelsgard@breckenridgemn.net	City of Breckenridge Utilities	420 Nebraska Avel Breckenridge, MN 56520	Electronic Service	No	SPL_SL_14-413_Initial Notice
Joseph	Ayers	joe.ayers@tccaction.com	Tri-County Community Action (TCC)	501 LeMieur Street Little Falls, MN 56345-3367	Paper Service	No	SPL_SL_14-413_Initial Notice
Connie	Bagley	connie@semaaarochestermn.org	Southwestern Minnesota AAA	421 SW First Avenue, Room 201 Rochester, MN 55902	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Bailey	dbailey@bullseyetelecom.com	BullsEye Telecom, Inc.	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	SPL_SL_14-413_Initial Notice
James T	Balvanz	N/A	Boomerang Wireless LLC	955 Kacena Rd Ste A Hiawatha, IA 52233	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street Blue Earth, MN 56013	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jim	Beattie	N/A	Blue Earth Valley Telephone Co.	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-413_Initial Notice
Jim	Beattie	N/A	Pine Island Telephone Company	123 W 7th St Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-413_Initial Notice
Jim	Beattie	N/A	Easton Telephone Co.	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-413_Initial Notice
Jim	Beattie	N/A	Cannon Valley Telecom, Inc.	123 W 7th St Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-413_Initial Notice
Jim	Beattie	N/A	Granada Telephone Company	123 W 7th St. Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-413_Initial Notice
Jim	Beattie	N/A	Eckles Telephone Company dba BEVCOMM	123 West 7th Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-413_Initial Notice
Robert	Benes	bobb@lakesandpines.org	Lakes and Pines Community Action Council	1700 Maple Avenue East More, MN 55051-1227	Paper Service	No	SPL_SL_14-413_Initial Notice
Jim	Benning	jbenning@duluthmn.gov	City of Duluth	Room 202 411 West First Street Duluth, MN 55802	Paper Service	No	SPL_SL_14-413_Initial Notice
Dirk	Berger	dberger@bevcomm.com	BEVCOMM Eckles Telephone Company	115 Main Street W. New Prague, MN 56071	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kyle	Bertrand	kbertrand@broadvox.com	Broadvox-CLEC, LLC	75 Erieview Plaza Suite 400 Cleveland, OH 44114	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	SPL_SL_14-413_Initial Notice
Fazil	Bhimani	fazilb@aol.com	LightNet LLC	2790 Quebec Court Little Canada, MN 55117	Electronic Service	No	SPL_SL_14-413_Initial Notice
David	Bickett		Park Region Mutual Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Bickett		Valley Telephone Co.	PO Box 277 100 Main Street Underwood, MN 56586	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Bickett	dave.bickett@parkregion.com	Otter Tail Telcom	PO Box 277 100 Main St Underwood, MN 56586	Electronic Service	No	SPL_SL_14-413_Initial Notice
Carl	Billek, Esq.	carl.billek@idt.net	IDT America Corp.	550 Broad St 17th Fl 520 Broad Street Newark, NJ 07102	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mark	Birkholz	N/A	Clements Telehone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark	Birkholz	N/A	Osakis Telephone	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Arlyn	Birkholz	bademailbirkholz@access-com.net	Access Communications Inc	5005 Cheshire Parkway N., Suite 1 Plymouth, MN 55446	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark	Birkholz	N/A	Redwood County Telephone Company	160 Second Avenue SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark	Birkholz	N/A	Midwest Information Systems, Inc.	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark	Birkholz	N/A	Melrose Telephone Company	150 Second St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark	Birkholz	N/A	Home Telephone Company	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark	Birkholz	N/A	Mainstreet Communications, LLC	150 Second St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
Bruce	Bjerke	bbjerke@minnkota.com	Clearwater-Polk Electric	315 Main Avenue North PO Box O Bagley, MN 566211001	Electronic Service	No	SPL_SL_14-413_Initial Notice
Nancy	Blankenhagen	nancyblankenhagen@nu-telcom.net	New Ulm Telecom Inc.	P.O. Box 697 27 N. Minnesota Street New Ulm, MN 560730697	Electronic Service	No	SPL_SL_14-413_Initial Notice
Liam	Bohan	liam.bohan@ftthcom.com	FTTH Communications L.L.C.	c/o EveresTV Two Executive Drive, Ste 635 Fort Lee, NJ 07024	Electronic Service	No	SPL_SL_14-413_Initial Notice
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard M.	Boudria	dboudria@bcntele.com	BCN Telecom, Inc.	107 W Michigan Ave FL 4 Kalamazoo, NJ 49007	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kathy	Boutwell	kathyb@chriscomco.net	Christensen Communications Co	104 Main Street West Madelia, MN 56062	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jim	Bowers	N/A	North St. Paul Public Works	2400 Margaret St. N. St. Paul, MN 55109-3020	Paper Service	No	SPL_SL_14-413_Initial Notice
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-413_Initial Notice
Carolina	Bradpiece	cbradpiece@capagency.org	Community Action Partnership of Scott,	Carver and Dakota Counties 712 Canterbury Road South Shakopee, MN 55379	Paper Service	No	SPL_SL_14-413_Initial Notice
Lisa	Brickner	lbrickner@grandportage.com	Grand Portage Reservation Tribal Council	83 Stevens Road, P.O. Box 428 Grand Portage, MN 55605	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_14-413_Initial Notice
Paul	Brinkman	paulb@nesc.k12.mn.us	Northeast Service Cooperative	5525 Emerald Ave Mountain Iron, MN 55768-2068	Electronic Service	No	SPL_SL_14-413_Initial Notice
Tim	Brinkman	tim.brinkman@parkregion.com	Park Region Mutual Telephone Co.	100 Main Street PO Box 277 Underwood, MN 56586	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Vera	Brown	vbrown@mnochippewatribe.org	Minnesota Chippewa Tribe AAA	PO Box 217 Cass Lake, MN 56633	Paper Service	No	SPL_SL_14-413_Initial Notice
Diane	Browning	diane.c.browning@sprint.com	Sprint Corporation	KSOPHN0314-3A459 6450 Sprint Pkwy Overland Park, KS 66251	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mary	Buley	N/A	Minnesota Independent Equal Access Corp.	10300 6th Ave N Plymouth, MN 55441	Paper Service	No	SPL_SL_14-413_Initial Notice
Mary	Buley	mary.buley@onvoy.com	Onvoy, LLC	10300 6th Ave N Plymouth, MN 55441	Electronic Service	No	SPL_SL_14-413_Initial Notice
Christopher	Bunce	cbunce@birch.com	Ionex Communications North, Inc.	2323 Grand Blvd Ste 925 Kansas City, MO 64108	Electronic Service	No	SPL_SL_14-413_Initial Notice
Richard G.	Burud	burud@federatedrea.coop	Federated Rural Electric Assoc.	PO Box 69 77100 US Highway 71 Jackson, MN 56143	Electronic Service	No	SPL_SL_14-413_Initial Notice
Danny	Busche	dannyb@means.net	Minnesota Valley Telephone Company	318 Second Ave East P O Box 310 Franklin, MN 55333-0310	Electronic Service	No	SPL_SL_14-413_Initial Notice
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	SPL_SL_14-413_Initial Notice
Lance	Casey	lance.casey@consolidated.com	Consolidated Communications	N/A	Electronic Service	No	SPL_SL_14-413_Initial Notice
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peter	Chevalier	peter.chevalier@zayo.com	Zayo Enterprise Networks, LLC	400 Centennial Pkwy Ste 200 Louisville, CO 80027	Electronic Service	No	SPL_SL_14-413_Initial Notice
Olson	Chris	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	SPL_SL_14-413_Initial Notice
Linda J.	Cicco	N/A	BT Americas Inc.	11440 Commerce Park Drive Reston, VI 20191	Paper Service	No	SPL_SL_14-413_Initial Notice
Cathy	Clucas	cathy.clucas@centurylink.com	CenturyLink	200 South 5th St Room 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jules	Coffman	jcoffman@pngmail.com	PNG Telecommunications, Inc.	8805 Governors Hill Dr Ste 250 Cincinnati, OH 45249-3312	Electronic Service	No	SPL_SL_14-413_Initial Notice
Regulatory	Contact	wci.regulatory@windstream.com	Windstream Communications, Inc.	600 Willowbrook Office Park Fairport, NY 14450	Electronic Service	No	SPL_SL_14-413_Initial Notice
Geoff	Cookman	regulatory@granitenet.com	Granite Telecommunications, LLC	100 Newport Avenue Ext Quincy, MA 02171	Electronic Service	No	SPL_SL_14-413_Initial Notice
Rod	Cox	rod.cox@tdsmetro.com	TDS Metrocom	Suite 6000 525 Junction Road Madison, WI 53717	Electronic Service	No	SPL_SL_14-413_Initial Notice
Patrick D.	Crocker	contact@nationwideregulatorycompliance.com	CROCKER & CROCKER	The Kalamazoo Building 107 West Michigan, 4th Floor Kalamazoo, MI 490074752	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Allen	Crowser	acrowser@rea-alp.com	Alexandria Light and Power	316 Fillmore Street P. O. Box 609 Alexandria, MN 563080609	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jie	Cui	jcui@oncommunications.com	CTC Communications Corp. d/b/a EarthLink Business	225 Cedar Hill St Ste 111 Marlborough, MA 01752	Electronic Service	No	SPL_SL_14-413_Initial Notice
Greg	Darnell	greg.darnell@cbeyond.net	Cbeyond Communications	320 Interstate North Pkwy SE Ste 300 Atlanta, GA 30339-2205	Electronic Service	No	SPL_SL_14-413_Initial Notice
Haleh	Davary	haleh.davary@verizon.com	Verizon	c/o VERIZON 201 Spear St FL 7 San Francisco, CA 94105	Electronic Service	No	SPL_SL_14-413_Initial Notice
William	Davis	lkurth@campis.org	Community Action of Minneapolis	505 East Grant St Ste 100 Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jean	Dawson		MN Government Report	B-12 Press Room State Capitol St. Paul, MN 55155	Paper Service	No	SPL_SL_14-413_Initial Notice
Dennis	DeMers	dpd@tvoc.org	Tri-Valley Opportunity Council	102 North Broadway, P.O. Box 607 Crookston, MN 56716	Paper Service	No	SPL_SL_14-413_Initial Notice
Jennifer	DePinto	N/A	Reliant Communications, Inc.	801 International Pkwy Suite 500 Lake Mary, FL 32746	Paper Service	No	SPL_SL_14-413_Initial Notice
Linda	Dellaero	ldellaero@matrixbt.com	Matrix Telecom, Inc.	433 E Las Colinas Blvd Ste 400 Irving, TX 75039	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	DenHerder	sdenherder@lightedge.com	LH TELECOM, INC.	215 10th Street Suite 1220 Des Moines, IA 50309	Electronic Service	No	SPL_SL_14-413_Initial Notice
Legal	Department	N/A	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Paper Service	No	SPL_SL_14-413_Initial Notice
Ramona R.	Desjarlait	ramonad@paulbunyan.net	Red Lake Band of Chippewa Indians	PO Box 190 Red Lake, MN 56671	Paper Service	No	SPL_SL_14-413_Initial Notice
Ralph	Dichy	rdichy@mettel.net	Metropolitan Telecommunications of Minnesota, Inc. dba MetTel	55 Water St FL 31 New York, NY 10041	Electronic Service	No	SPL_SL_14-413_Initial Notice
Shannon	Dieringer	sdieringer@firstcomm.com	First Communications LLC	3340 West Market Street Akron, OH 44333	Electronic Service	No	SPL_SL_14-413_Initial Notice
Executive	Director		League Of MN Cities	145 University Avenue West St Paul, MN 551032044	Paper Service	No	SPL_SL_14-413_Initial Notice
Elaine	Divelbliss	N/A	Virgin Mobile USA, L.P.	10 Independence Blvd Warren, NJ 07059	Paper Service	No	SPL_SL_14-413_Initial Notice
Loretta	Dixon	loretta.dixon@lowersiouxc om	Lower Sioux Indian Community	39527 Res Highway 1 PO Box 308 Morton, MN 39527	Paper Service	No	SPL_SL_14-413_Initial Notice
Linda	Dobinson	linda.dobinson@telcologix. com	Telcologix, LLC	209 W. 1st Street Suite 200 Duluth, MN 55802	Electronic Service	No	SPL_SL_14-413_Initial Notice
Liza	Donabauer	ldonabauer@arlingtonmn.c om	City of Arlington	204 Shamrock Drive Arlington, MN 55307	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	SPL_SL_14-413_Initial Notice
Melissa	Driskell	melissa.driskell@telrite.com	Telrite Corporation	4113 Monticello St Covington, GA 30014	Electronic Service	No	SPL_SL_14-413_Initial Notice
Allison	Dunmire	allison_dunmire@mitel.com	Mitel NetSolutions, Inc.	1146 N Alma School Rd Mesa, AZ 85201-3000	Electronic Service	No	SPL_SL_14-413_Initial Notice
David L.	Dunning	N/A	Wolverton Telephone Company	PO Box 270 Park River, ND 58270	Paper Service	No	SPL_SL_14-413_Initial Notice
Pete	Eggimann	PEGGIMANN@MN- MESB.ORG	Metropolitan Emergency Services Board	2099 University Ave W Ste 201 St. Paul, MN 551043431	Electronic Service	No	SPL_SL_14-413_Initial Notice
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	SPL_SL_14-413_Initial Notice
Joan	Engler	joan.m.engler@verizon.com	Verizon Select Services, Inc.	1 Verizon Way VC53S460 Basking Ridge, NJ 07920	Electronic Service	No	SPL_SL_14-413_Initial Notice
Robin	Enkey	robine@budgetprepay.com	Budget PrePay, Inc. dba Budget Phone	1325 Barksdale Blvd Ste 200 Bossier City, LA 71111-4600	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mark	Erickson		City Of Lakefield	301 Main Street PO Box 1023 Lakefield, MN 561500900	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Erpelding	mark@openaccessconnections.org	Open Access Connections	1821 University Avenue Suite N-184 ST. Paul, MN - Minnesota 55104	Electronic Service	No	SPL_SL_14-413_Initial Notice
Donna	Eul	donnaeul@fedtel.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	SPL_SL_14-413_Initial Notice
Carol	Fabre	carolf@whiteearth.com	White Earth Reservation Tribal Council	County Road 4, P.O. Box 418 White Earth, MN 56591	Paper Service	No	SPL_SL_14-413_Initial Notice
Benay	Fairbanks	benay.fairbanks@llojibwe.org	Leech Lake Band of Ojibwe	Tribal Development 115 Sixth Street NW, Suite E Cass Lake, MN 56633	Paper Service	No	SPL_SL_14-413_Initial Notice
Christianson	Farms			RR 2 Miltona, MN 56354	Paper Service	No	SPL_SL_14-413_Initial Notice
Kristen	Farole	kfarole@terracominc.com	TerraCom, Inc.	401 E Memorial Rd Ste 400 Oklahoma City, OK 73114	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kelly	Faul	kelly.faul@xo.com	XO Communications Services Inc.	13865 Sunrise Valley Drive Herndon, VA 20171	Electronic Service	No	SPL_SL_14-413_Initial Notice
Erin	Feikema	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd AvePO Box 127 Lismore, MN 56155	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jeffrey	Feldman	jfeldman@everestv.com	FTTH Communications L.L.C.	c/o EverestV Two Executive Drive, Ste 635 Fort Lee, NJ 07024	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd Columbus, OH 43231-5931	Electronic Service	No	SPL_SL_14-413_Initial Notice
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	SPL_SL_14-413_Initial Notice
Terri	Firestein	tfireccg@myactv.net	FiberNet Monticello	10806 Garrison Hollow Rd Clear Spring, MD 21722	Electronic Service	No	SPL_SL_14-413_Initial Notice
Cynthia	Firstman	cat@airespring.com	Airespring, Inc.	6060 Sepulveda Blvd. Suite 220 Van Nuys, CA 91411	Electronic Service	No	SPL_SL_14-413_Initial Notice
George	Fish	gfish@gvtel.com	Garden Valley Telephone Company	PO Box 259 201 Ross Ave Erskine, MN 56535-0259	Electronic Service	No	SPL_SL_14-413_Initial Notice
John	Fitzgerald	N/A	Western Community Action	1400 South Saratoga Street Marshall, MN 56258-1315	Paper Service	No	SPL_SL_14-413_Initial Notice
Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	SPL_SL_14-413_Initial Notice
Shari	Flanders	sflanders@polartel.com	Polar Communications	PO Box 270 Park River, ND 58270	Electronic Service	No	SPL_SL_14-413_Initial Notice
Thomas	Fletcher	tfletcher@aexcom.com	AEX Communications, Inc.	4445 W 77th St Ste 102 Edina, MN 55435-5134	Electronic Service	No	SPL_SL_14-413_Initial Notice
William	Flynn, Esq.		LINDQUIST & VENNUM P.L.L.P.	4200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Charles	Forst	charles.forst@zayo.com	Zayo Group, LLC	400 Centennial Pkwy Ste 200 Louisville, CO 80027	Electronic Service	No	SPL_SL_14-413_Initial Notice
Lisa Jill	Freeman	ljfreeman@bandwidth.com	Bandwidth.com CLEC, LLC	Venture Center III - 5th Floor 900 Main Campus Drive Raleigh, NC 27606	Electronic Service	No	SPL_SL_14-413_Initial Notice
Susan	Freeman		Network Operator Services, Inc.	P.O. Box 3529 Longview, TX 75606	Paper Service	No	SPL_SL_14-413_Initial Notice
Paul	Fuglie		Verizon Select Services	HQE01H21 600 Hidden Ridge Irving, TX 75038	Paper Service	No	SPL_SL_14-413_Initial Notice
Wayne	Gandy		Encompass Communications, LLC	Suite 286 119 West Tyler Street Longview, TX 75601	Paper Service	No	SPL_SL_14-413_Initial Notice
Bill	Garcia	bill.garcia@windstream.com	Windstream	1800 Old Pecos Trail, Suite J Santa Fe, NM 87505	Electronic Service	No	SPL_SL_14-413_Initial Notice
Tony	Gebhard	tony@sytekcom.com	Upsala Cooperative Telephone Association	PO Box 366 117 Main St Upsala, MN 56384	Electronic Service	No	SPL_SL_14-413_Initial Notice
Tara	Geshick	tgeshick@boisfortensn.gov	Bois Forte Reservation Tribal Council	5344 Lake Shore Drive, PO Box 16 Nett Lake, MN 55772	Paper Service	No	SPL_SL_14-413_Initial Notice
Linda	Giersdorf	lindag@rmdc.org	Minnesota River Area Agency on Aging, Inc.	PO Box 3323 Mankato, MN 56002-3323	Paper Service	No	SPL_SL_14-413_Initial Notice

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Edward H.	Griffin		US LEC Communications, Inc.	6801 Morrison Blvd. Charlotte, NC 28211	Paper Service	No	SPL_SL_14-413_Initial Notice
Marv	Grunig	winutl@windom-mn.com	Windom Municipal Utilities	444 9th Street Windom, MN 56101	Electronic Service	No	SPL_SL_14-413_Initial Notice
Donna	Gunderson		Johnson Telephone Company	205 1st Avenue NE PO Box 39 Remer, MN 56672	Paper Service	No	SPL_SL_14-413_Initial Notice
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	SPL_SL_14-413_Initial Notice
Jennifer	Haas	regulatory@publicwireless.com	Public Wireless, Inc.	25 East Trimble Road San Jose, CA 95131	Electronic Service	No	SPL_SL_14-413_Initial Notice
William	Haas	N/A	T-Mobile Central, LLC	601 Pennsylvania Av. NW Ste 800 Washington, DC 20004-2710	Paper Service	No	SPL_SL_14-413_Initial Notice
Steven J.	Haaven	shaaven@minnkota.com	Wild Rice Electric Cooperative, Inc.	PO Box 438 502 North Main Mahnomon, MN 56557	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mary	Haberek	mhaberek@ami.net	AMI Communications, Inc.	300 Cardinal Drive, Suite 280 St. Charles, IL 60175	Electronic Service	No	SPL_SL_14-413_Initial Notice
Brian	Hackett	bhackett@gtl.net	Global Tel*Link Corporation	12021 Sunset Hills Rd Ste 100 Reston, VA 20190	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert L.	Hammond, Jr.	N/A	BEVCOMM, Inc.	123 W 7th St Blue Earth, MN 56013-1309	Paper Service	No	SPL_SL_14-413_Initial Notice
Catherine	Hannan	channan@broadviewtel.com	Broadview Networks, Inc.	800 Westchester Avenue Suite N-501 Rye Brook, NY 10573	Electronic Service	No	SPL_SL_14-413_Initial Notice
JoAnn	Hanson	joann.hanson@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-413_Initial Notice
Bruce	Hanson	N/A	Clara City Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SL_14-413_Initial Notice
Bruce	Hanson	N/A	Starbuck Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SL_14-413_Initial Notice
Diane	Hanson	dhanson@bvillemn.net	Barnesville Munc. Phone & Electric	PO Box 550 102 Front Street North Barnesville, MN 56514	Electronic Service	No	SPL_SL_14-413_Initial Notice
Bruce	Hanson	N/A	Zumbrot Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SL_14-413_Initial Notice
Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1700 Technology Dr Ste 100 Willmar, MN 56201	Electronic Service	No	SPL_SL_14-413_Initial Notice
Robert J.	Hauge	lccity@hickorytech.net	Lake Crystal Municipal Utilities	100 E. Robinson Street P.O. Box 86 Lake Crystal, MN 560550086	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dan	Hayes		Southern Minnesota Municipal Power	500 1st Avenue SW Rochester, MN 559023303	Paper Service	No	SPL_SL_14-413_Initial Notice
Peter	Healy	peter.healy@tdsmetro.com	TDS Metrocom, Inc.	525 Junction Rd Ste 6000 Madison, WI 53717	Electronic Service	No	SPL_SL_14-413_Initial Notice
Donna	Heaston	Donna.Heaston@IntegraTelecom.com	Integra Telecom of MN, Inc	6160 Golden Hills Drive Golden Valley, MN 55416	Electronic Service	No	SPL_SL_14-413_Initial Notice
William	Heaston	bill.heaston@sdncommunications.com	PrairieWave Telecommunications, Inc.	2900 W. 10th Street Sioux Falls, SD 57104	Electronic Service	No	SPL_SL_14-413_Initial Notice
William P.	Heaston	N/A	South Dakota Network, LLC	2900 W. 10th Street Sioux Falls, SD 57104	Paper Service	No	SPL_SL_14-413_Initial Notice
Ted	Heckmann	ted.Heckmann@cinbell.com	Cincinnati Bell Any Distance, Inc.	P.O. Box 2301 221 E. Fourth Street, 1280 Cincinnati, OH 45201-2301	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jerry	Heiberger	jerry.heiberger@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	SPL_SL_14-413_Initial Notice
Charles	Heins	cheins@ci.redwood-falls.mn.us	Redwood Falls Public Utilities	PO Box 526 Redwood Falls, MN 562830526	Electronic Service	No	SPL_SL_14-413_Initial Notice
Andy	Hennis	andyh@chriscomco.net	Christensen Communications Company	104 West Main Street Madelia, MN 56062	Electronic Service	No	SPL_SL_14-413_Initial Notice
John	Herron	N/A	City Of Melrose / Melrose Public Util.	225 East First Street N. Melrose, MN 56352	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Hickle	jim.hickle@velocitytelephone.com	Velocity Telephone Inc	4050 Olson Memorial Hwy Ste 100 Golden Valley, MN 55422	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jim	Hiedeman	jimh@uppersiouxcommunity-nsn.gov	Upper Sioux Community	5744 Highway 67 East PO Box 147 Granite Falls, MN 56241	Paper Service	No	SPL_SL_14-413_Initial Notice
Clarence	Hightower	N/A	Community Action Partnership	of Ramsey and Washington Counties 450 North Syndicate Street, Suite 300 St. Paul, MN 55104-4127	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark	Hoffman	N/A	Entelegent Solutions, Inc.	3800 Arco Corp Drive Suite 310 Charlotte, NC 28273	Paper Service	No	SPL_SL_14-413_Initial Notice
Scott	Hoffmann	hoffmann@wins.net	Wisconsin Independent Network, LLC	Box 107 800 Wisconsin Street Eau Claire, WI 547033612	Electronic Service	No	SPL_SL_14-413_Initial Notice
Paul	Hoge	phoge@crosslake.net	Crosslake Communications	35910 County Road 66 PO Box 70 Crosslake, MN 56442	Electronic Service	No	SPL_SL_14-413_Initial Notice
Pamela	Hollick	pamela.hollick@twtelecom.com	TW Telecom	4625 W 86th St Ste 500 Indianapolis, IN 46268-7804	Electronic Service	No	SPL_SL_14-413_Initial Notice
Curtis L	Hopfinger	chopfinger@securustech.net	Evercom Systems, Inc.	14651 Dallas Pkwy Ste 600 Dallas, TX 752546815	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kevin	Hopkins	khopkins@telephoneassociates.com	Telephone Associates, Inc.	329 Grand Ave Superior, WI 54880	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rich	Horner		Guaranteed Phone Service	#1 2201 West Broadway Council Bluffs, IA 51501	Paper Service	No	SPL_SL_14-413_Initial Notice
Dan	Hoskins	danh@wikel.com	North Star Electric	P.O. Box 719 Baudette, MN 56623	Electronic Service	No	SPL_SL_14-413_Initial Notice
Gerard	Howe	jhowe@bigrivertelephone.com	Big River Telephone Company	24 South Minnesota Avenue Cape Girardeau, MO 63703	Electronic Service	No	SPL_SL_14-413_Initial Notice
Dana	Hoyle	cgarrett@broadvox.com	Cypress Communications Operating Company, LLC	1950 N. Stemmons Fwy. Ste. 3031 Dallas, TX 75229	Paper Service	No	SPL_SL_14-413_Initial Notice
William	Hunt	WilliamP.Hunt@dish.com	dishNET Wireline L.L.C.	2460 W 26TH AVE STE 380C Denver, CO 80211-5349	Electronic Service	No	SPL_SL_14-413_Initial Notice
Karen	Hyde	bademailkaren.hyde@level3.com	Level 3 Communications	200 Technology Drive Pittsburgh, PA 15219	Paper Service	No	SPL_SL_14-413_Initial Notice
Timothy	Ibisch	cityadmin@heartlandpower.org	City of Tyler	230 N. Tyler Street Tyler, MN 56178	Electronic Service	No	SPL_SL_14-413_Initial Notice
Charles S.	Isdall		Comdata Telecommunications Services	5301 Maryland Way Brentwood, TN 37027	Paper Service	No	SPL_SL_14-413_Initial Notice
SUZANNE	JAQUES	kconner@telephoneassociates.com	Telephone Associates	PO BOX 1436 823 Belknap St Ste 201 Superior, WI 54880	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marja	Johnson	lisa@icom.net	Coast International Inc.	14303 West 95TH Street Lenexa, KS 66215	Electronic Service	No	SPL_SL_14-413_Initial Notice
Dwayne	Johnson	jtcbusiness@means.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jane	Johnson		City Of Grove City	P.O. Box 98 Groove City, MN 56243	Paper Service	No	SPL_SL_14-413_Initial Notice
Catherine	Johnson	cjohnson@intercountycc.org	Inter-County Community Council	207 Main Street, PO Box 189 Oklee, MN 56742	Paper Service	No	SPL_SL_14-413_Initial Notice
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-413_Initial Notice
Korwin	Johnson	kjohnson@agralite.com	Agralite Electric Cooperative	PO Box 228 320 East Highway 12 Benson, MN 56215	Electronic Service	No	SPL_SL_14-413_Initial Notice
Johnny	Johnson	N/A	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Paper Service	No	SPL_SL_14-413_Initial Notice
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	SPL_SL_14-413_Initial Notice
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	SPL_SL_14-413_Initial Notice
William	King	billking@youbetnet.net	KTF Telcom	2156 Poplar St Mora, MN 55051	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Melanie	King	melanie.king@tagmobile.com	Tag Mobile, L.L.C.	1330 Capital Pkwy Carrollton, TX 75006-3647	Electronic Service	No	SPL_SL_14-413_Initial Notice
Linda	Klinkner	lindak@nu-telcom.net	New Ulm Telecom, Inc.	400 Second North PO Box 697 New Ulm, MN 560730697	Electronic Service	No	SPL_SL_14-413_Initial Notice
Rex	Knowles	Rex.Knowles@xo.com	XO Communications Services, Inc.	8851 Sandy Parkway Sandy, UT 84070	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	SPL_SL_14-413_Initial Notice
Thomas G.	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jim	Koep	utilities@lakefieldmn.com	Lakefield Public Utilities	PO Box 1023 Lakefield, MN 56150	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jeff	Korn	jkorn@storesonline.com	Crexendo Business Solutions, Inc.	1303 N. Research Way Orem, UT 84097	Electronic Service	No	SPL_SL_14-413_Initial Notice
Patricia	Kraft	patricia.kraft@state.mn.us	Department of Public Safety	445 Minnesota Stree Suite 137 St Paul, Minnesota 55101-5137	Electronic Service	No	SPL_SL_14-413_Initial Notice
Brian	Krambeer	bkrամbeer@tec.coop	Tri-County Electric Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	SPL_SL_14-413_Initial Notice
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Deborah L.	Kuhn	deborah.kuhn@verizon.com	VERIZON	Suite 700 205 North Michigan Avenue Chicago, IL 60601	Electronic Service	No	SPL_SL_14-413_Initial Notice
Pamela	LaBine	nashwaukcityhall@mchsi.com	Nashwauk Public Utilities	301 Central Avenue Nashwauk, MN 55769	Electronic Service	No	SPL_SL_14-413_Initial Notice
Andrew	Labbe	andrew.labbe@level3.com	Level 3 Communications, LLC	1025 Eldorado Blvd Broomfield, CO 80021	Electronic Service	No	SPL_SL_14-413_Initial Notice
Renee	Ladd	rldadd@arnan.com	ARNAN Services, Inc.	5125 Mill Road Red Wing, MN 55066	Electronic Service	No	SPL_SL_14-413_Initial Notice
Debra	Larson	debp5@willmar.com	Prairie Five Community Action Council	719 North 7th Street Montevideo, MN 56265	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Larson	dave.larson@fosston.com	Fosston Municipal Utilities	220 E 1st St. PO Box 239 Fosston, MN 56542	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kevin	Larson	klarson@ctctelcom.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	SPL_SL_14-413_Initial Notice
Larry	Laskowski		Network Billing Systems	155 Willowbrook Blvd Wayne, NJ 7470	Paper Service	No	SPL_SL_14-413_Initial Notice
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_14-413_Initial Notice
Colleen	Lockett	regulatory@intrado.com	Intrado Communications Inc.	1601 Dry Creek Dr. Longmont, CO 80503	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mary	Lohnes	mary_lohnes@mimi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_14-413_Initial Notice
Greg	Lohrenz	gregl@aitech.net	Advanced Integrated Technologies	9855 W 78th St Ste 300 Eden Prairie, MN 55344	Electronic Service	No	SPL_SL_14-413_Initial Notice
Bill	Loonan		Lismore Coop. Telephone Co.	PO Box 127 Lismore, MN 56155	Paper Service	No	SPL_SL_14-413_Initial Notice
Kathy	Lund	N/A	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Paper Service	No	SPL_SL_14-413_Initial Notice
Kurt	Maass	N/A	TTM Operating Corporation, Inc.	Suite 210 146 N. Canal Street Seattle, WA 98103	Paper Service	No	SPL_SL_14-413_Initial Notice
Danna	MacKenzie	danna.mackenzie@state.mn.us	MN Office of Broadband Development	332 Minnesota Street, #E200 1st National Bank Building St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-413_Initial Notice
James	MacKenzie	info@wimactel.com	WiMacTel, Inc.	13515 I Circle Omaha, NE 68137	Electronic Service	No	SPL_SL_14-413_Initial Notice
Joan	Macik	joanm@heartlandcaa.org	Heartland Community Action Agency	200 SW 4th St, PO Box 1359 Willmar, MN 56207	Paper Service	No	SPL_SL_14-413_Initial Notice
Lee	Maier	lee@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
General	Manager		Lake Country Power	Grand Rapids Service Center 2810 Elida Drive Grand Rapids, MN 55744	Paper Service	No	SPL_SL_14-413_Initial Notice
James	Mancuso	jmanuso@clearworld.net	Clear World Communications	3501 South Harbor Blvd. Suite 200 Santa Ana, CA 92704	Electronic Service	No	SPL_SL_14-413_Initial Notice
Thomas	Margavio	tm5886@att.com	BellSouth Long Distance, Inc.	AT&T Midtown Center 675 W Peachtree Ste 17E21 Atlanta, GA 30375	Electronic Service	No	SPL_SL_14-413_Initial Notice
Tom	Maroney	tmaroney@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	SPL_SL_14-413_Initial Notice
Katherine Barker	Marshall	N/A	US Signal Company, L.L.C.	201 Ionia Avenue SW Grand Rapids, MI 49503	Paper Service	No	SPL_SL_14-413_Initial Notice
Paul	Masters	pmasters@ernestgroup.com	Ernest Communications, Inc.	Suite 150 5275 Triangle Parkway Norcross, GA 30092	Electronic Service	No	SPL_SL_14-413_Initial Notice
Laura	Matosian	regulatory@comtech21.com	COMTECH 21, LLC	One Barnes Park South Wallingford, CT 6492	Electronic Service	No	SPL_SL_14-413_Initial Notice
Joe	Mattison	jmattison@telephoneassociates.com	Telephone Associates, Inc.	329 Grand Avenue Superior, WI 54880	Electronic Service	No	SPL_SL_14-413_Initial Notice
Anthony	Mayer		WETEC LLC Db a Unitel Communications	105 Third Street West P.O. Box 151 Park Rapids, MN 56470	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert W.	McCausland	robert.mccausland@h3net.com	Hypercube Telecom, LLC	3200 W Pleasant Run Rd Ste 300 Lancaster, TX 75146	Electronic Service	No	SPL_SL_14-413_Initial Notice
Francie	McComb		Talk America, Inc.	2134 W. Laburnum Ave. Richmond, VA 232274342	Paper Service	No	SPL_SL_14-413_Initial Notice
Pat	McDonough	N/A	i-Wireless	1 Levee Way Ste 3104 Newport, KY 41071	Paper Service	No	SPL_SL_14-413_Initial Notice
Patrick	McFarland	patrick.mcfarland@accap.org	Anoka County Community Action Program	1201 - 89th Avenue NE, Suite 345 Blaine, MN 55434	Paper Service	No	SPL_SL_14-413_Initial Notice
James	McKnight	JMCKNIGHT@mediacomc.com	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way Mediacom, NY 10918	Electronic Service	No	SPL_SL_14-413_Initial Notice
David	Meyer	dave@glencoelightandpower.com	Glencoe Light and Power Commission	305 11th Street East Glencoe, MN 55336	Electronic Service	No	SPL_SL_14-413_Initial Notice
Johnny	Michael	jbekuto@yahoo.com	Worldview Video Relay Service d/b/a Worldview VRS	3832 Dunbar Ct Brooklyn Park, MN 55443-1975	Electronic Service	No	SPL_SL_14-413_Initial Notice
Shelby	Michlin		Network Billing Systems, LLC	155 Willowbrook Blvd. Wayne, NJ 7470	Paper Service	No	SPL_SL_14-413_Initial Notice
Robert A	Millar	robert.millar@crowncastle.com	NextG Networks of Illinois, Inc.	c/o CROWN CASTLE 2000 Corporate Dr Canonsburg, PA 15317	Electronic Service	No	SPL_SL_14-413_Initial Notice
Angie	Miller	N/A	Community Action Duluth	2424 W. 5th St Suite 102 Duluth, MN 55806	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jackie	Mines	Jackie.Mines@state.mn.us	Department of Public Safety	x x 55102	Electronic Service	No	SPL_SL_14-413_Initial Notice
Keith	Modglin	keith.modglin@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Dr Onamia, MN 56359-2236	Electronic Service	No	SPL_SL_14-413_Initial Notice
Deb	Mohelski	debmohelski@mlwl.us	Moose Lake Water And Light Commission	P.O. Box 418 401 Douglas Ave Moose Lake, MN 55767	Electronic Service	No	SPL_SL_14-413_Initial Notice
Michael	Monsrud	N/A	Bagley Public Utilities	18 Main Ave. S. PO Box M Bagley, MN 56621	Paper Service	No	SPL_SL_14-413_Initial Notice
Richard	Monto	rmonto@inteliquent.com	Neutral Tandem-Minnesota, LLC	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	SPL_SL_14-413_Initial Notice
Michael R.	Moore	michael.moore@chartercom.com	Charter Communications, Inc.	12405 Powerscourt Drive St. Louis, MO 63131	Electronic Service	No	SPL_SL_14-413_Initial Notice
Monty	Morrow	montymorrow@nu-telecom.net	NU Telecom	235 Franklin St PO Box 279 Hutchinson, MN 55350	Electronic Service	No	SPL_SL_14-413_Initial Notice
Katherine	Mudge	katherine.mudge@megapath.com	MegaPath Corporation	1835-B Kramer Ln Ste 100 Austin, TX 78758	Electronic Service	No	SPL_SL_14-413_Initial Notice
Julie	Musselman Oost	regulatory@airustel.com	Airus, Inc.	840 S Canal St FL 7 Chicago, IL 60607-4519	Electronic Service	No	SPL_SL_14-413_Initial Notice
Ralph D.	Mykkanen	BADEMAIL-ralphm@mlcmmn.com	Mille Lacs Electric Cooperative	P.O. Box 230 Aitkin, MN 56431	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Nagle	steven@wcmca.org	West Central Minnesota Communities Action	411 Industrial Park Blvd. Elbow Lake, MN 56531-4213	Paper Service	No	SPL_SL_14-413_Initial Notice
Dale	Narlock	dnarlock@citytrf.net	City of Thief River Falls	Power & Light Dept. Box 528 Thief River Falls, MN 56701	Electronic Service	No	SPL_SL_14-413_Initial Notice
Steve	Nasby	snasby@windom-mn.com	City of Windom	444 9th St PO Box 38 Windom, MN 56101-0038	Electronic Service	No	SPL_SL_14-413_Initial Notice
David	Nelson	davidnelson@kpcoop.com	Kandiyohi Power Cooperative	P.O. Box 40 8605 47th Street NE Spicer, MN 562880040	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mike	Nelson	N/A	Comcast Phone of Minnesota, Inc.	183 Inverness Drive West Englewood, CO 80112	Paper Service	No	SPL_SL_14-413_Initial Notice
Daniel C.	Nelson	dcndtc@bevcomm.net	Dunnell Telephone Company, Inc.	PO Box 42 110 N Seeley Ave Dunnell, MN 56127	Electronic Service	No	SPL_SL_14-413_Initial Notice
Michael	Nelson	Michael_Nelson@cable.comcast.com	Comcast Corp.	183 Inverness Drive West Englewood, CO 80112	Electronic Service	No	SPL_SL_14-413_Initial Notice
DeeAnne	Newville	dnewville@renville-sibley.coop	Renville-Sibley Cooperative Power Assn	103 Oak Street Box 68 Danube, MN 56230	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mark	Nibaur	markn@austinutilities.com	Austin Utilities	400 Fourth Street NE Austin, MN 55912	Electronic Service	No	SPL_SL_14-413_Initial Notice
Randy	Nordin	ranordin@nwcaa.org	Norwest Comm Action Agency	312 North Main Street PO Box 67 Badger, MN 56714	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Keith	Nussbaum	keith@preferredlongdistance.com	Preferred Long Distance, Inc.	Suite 350 16830 Ventura Blvd. Encino, CA 91436	Electronic Service	No	SPL_SL_14-413_Initial Notice
Matt	O'Flaherty	oflaherty.matt@gmail.com	SelecTel, Inc.	1825 N Bell St Freemont, NE 68025	Electronic Service	No	SPL_SL_14-413_Initial Notice
Joseph	O'Hara	N/A	Zone Telecom, LLC	3130 Pleasant Run Springfield, IL 62711	Paper Service	No	SPL_SL_14-413_Initial Notice
Financial	Officer		Emily Cooperative Telephone Company	P.O. Box 100 Emily, MN 564470100	Paper Service	No	SPL_SL_14-413_Initial Notice
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	SPL_SL_14-413_Initial Notice
Robert	Olson	rolson@emily.net	Emily Cooperative Telephone Company	PO Box 100 Emily, MN 564470100	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jennifer	Ong	jennifer.ong@timestelecomusa.com	Yestel USA, Inc.	4343 E Lowell St c/o TIMES TELECOM USA Ontario, CA 91761-2222	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mike	Orcutt	mgorcutt@nttservices.com	Nebraska Technology & Telecommunications, In.	2308 S. 156 Circle Omaha, NE 68130	Electronic Service	No	SPL_SL_14-413_Initial Notice
Eric James	Osterberg	staff@soundchoicecommunications.com	Sound Choice Communications, LLC	PO Box 17010 Minneapolis, MN 55417	Electronic Service	No	SPL_SL_14-413_Initial Notice
Craig	Otterness	otter@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Donna	Palumbo	donna.palumbo@ipc.com	IPC Network Services, Inc.	3 2nd St 15th Floor Jersey City, NJ 07311	Electronic Service	No	SPL_SL_14-413_Initial Notice
Wayne	Paplow		City Of Dundee	111 N. Main Street Dundee, MN 56131	Paper Service	No	SPL_SL_14-413_Initial Notice
Kimm	Partridge	kimm.partridge@ucn.net	UCN, Inc.	Suite 500 7730 S. Union Park Avenue Midvale, UT 84047	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mark	Pavol	regulatory@ymaxcorp.com	YMAX Communications Corp.	PO BOX 6785 West Palm Beach, FL 33404-6785	Electronic Service	No	SPL_SL_14-413_Initial Notice
Joseph	Pederson	joep@lakesandprairies.net	Lakes & Prairies Community Action	Partnership, Inc. 715 11th Street N. #402 Moorhead, MN 565602088	Paper Service	No	SPL_SL_14-413_Initial Notice
Gloria	Pederson	gpederson@bevcomm.com	Cannon Valley Telephone, Inc.	123 West Seventh Street Blue Earth, MN 56013	Electronic Service	No	SPL_SL_14-413_Initial Notice
Rochelle	Pervisky	RPervisky@exchange.hbcicom	Hiawatha Broadband	58 Johnson Street Winona, MN 55987	Electronic Service	No	SPL_SL_14-413_Initial Notice
Diane	Peters	diane.peters@level3.com	Level 3 Communications, LLC	225 Kenneth Dr. Rochester, NY 14623-4277	Electronic Service	No	SPL_SL_14-413_Initial Notice
Linda	Peterson	N/A	C-I Communications, Inc.	1102 Madison St Brainerd, MN 56401	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark E.	Petsche		Wells Public Utilities	P.O. Box 96 101 1st Street S.E. Wells, MN 56097	Paper Service	No	SPL_SL_14-413_Initial Notice
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	SPL_SL_14-413_Initial Notice
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-413_Initial Notice
Leah	Pigatti	lpigatti@mahube.org	Mahube-Otwa Community Action Parenership	1125 West River Road, P.O. Box 747 Detroit Lakes, MN 56502	Paper Service	No	SPL_SL_14-413_Initial Notice
Jennifer	Podolske		Wright Hennepin Co-Op Electric Assoc.	P.O. Box 330 6800 Electric Drive Rockford, MN 55373	Paper Service	No	SPL_SL_14-413_Initial Notice
THOMAS	QUINN	TOM.QUINN@SUNGARD. COM	SunGard NetWork Solutions Inc.	680 E SWEDESFORD RD WAYNE, PA 19087	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kris	Rademacher	krisr@farmerstel.net	Farmers Mutual Telephone Co.	301 2nd St S Bellingham, MN 562120369	Electronic Service	No	SPL_SL_14-413_Initial Notice
Lori	Raiber	lori.raiber@tricap.org	Tri-County Action Programs (Tri-CAP)	1210 23rd Avenue South PO Box 683 Waite Park, Mn 56387	Paper Service	No	SPL_SL_14-413_Initial Notice
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	SPL_SL_14-413_Initial Notice
Terry	Ray	tray@extenetsystems.com	ExteNet Systems, Inc.	Suite 340 3030 Warrenville Road Lisle, IL 60532	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jeff	Reynolds	bademailjeff@telequality.com	TeleQuality Communications, Inc.	Suite 207 16601 Blanco Road San Antonio, TX 78232	Paper Service	No	SPL_SL_14-413_Initial Notice
Robert	Riddell	telenutz@mlecwb.net	Northern Telephone Company	13448 Co. Rd. 25 Wawina, MN 557369721	Electronic Service	No	SPL_SL_14-413_Initial Notice
Robert	Riddell		Wilderness Valley Telephone Co. Inc.	13448 Co. Rd. 25 Wawina, MN 557369721	Paper Service	No	SPL_SL_14-413_Initial Notice
Robert S	Rife	grodham@diversifiedconsulting.net	Broadband Dynamics, LLC	8757 E Via De Comercio FL 1 Scottsdale, AZ 85258-3359	Electronic Service	No	SPL_SL_14-413_Initial Notice
Judith A	Riley	jriley@telecompliance.net	Mosaic Networx LLC dba MX NETWORK	PO Box 720128 Oklahoma City, OK 73172-0128	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jennifer	Rise	jrise@702com.net	VAL-ED Joint Venture LLP	702 Main Avenue Moorhead, MN 56560	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mark	Roach	mark.roach@ctctelcom.net	Consolidated Telephone Company	1102 Madison Street PO Box 972 Brainerd, MN 56401	Electronic Service	No	SPL_SL_14-413_Initial Notice
Vernell	Roberts		Wadena Light And Water	104 Jefferson Street North Wadena, MN 56402	Paper Service	No	SPL_SL_14-413_Initial Notice
Vernell	Roberts	vroberts@lakesnet.net	Detroit Lakes Public Utilities	1025 Roosevelt Ave Detroit Lakes, MN 56501	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Natalia	Rodrigues	nrodriques@wcs.com	Wholesale Carrier Services, Inc.	5471 N. University Drive Coral Springs, FL 33067	Electronic Service	No	SPL_SL_14-413_Initial Notice
Carey	Roesel	croesel@tmnc.com	Technologies Management, Inc.	PO Drawer 200 Winter Park, FL 327900200	Electronic Service	No	SPL_SL_14-413_Initial Notice
Clinton M.	Rogers	clintonmrogers@hotmail.com	Janesville Utilities	101 N. Mott, Box 0 Janesville, MN 560480617	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jeffrey	Roiland	jeff.s.roiland@gmail.com	Lake Communications	409 17th Ave Two Harbors, Mn 55616	Electronic Service	No	SPL_SL_14-413_Initial Notice
Brad	Roos	bradr@marshallutilities.com	Marshall Municipal Utilities	113 4th Street South Marshall, MN 56258	Electronic Service	No	SPL_SL_14-413_Initial Notice
Steve	Roussos	N/A	Convergia, Inc.	237 Hymns Blvd Pointe Claire, Quebec H9R 5C7 CANADA	Paper Service	No	SPL_SL_14-413_Initial Notice
Marc	Rozar		Custom Network Solutions, Inc.	Suite 102 210 E Route 4 Paramus, NJ 76525103	Paper Service	No	SPL_SL_14-413_Initial Notice
Michelle	Salisbury	michelle.salisbury@crowncastle.com	NewPath Networks, LLC	c/o CROWN CASTLE 2000 Corporate Dr Canonsburg, PA 15317	Electronic Service	No	SPL_SL_14-413_Initial Notice
Phillip	Sam	phillip.sam@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia, MN 56359	Paper Service	No	SPL_SL_14-413_Initial Notice
Catherine	Sampson	csampson@ardc.org	Arrowhead Area Agency on Aging	221 West 1st Street Duluth, MN 55802	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Curtis A	Sampson	bademaildspeiser@hcctel.net	O.U. Connection, Inc.	PO Box 697 27 N Minnesota St New Ulm, MN 56073	Paper Service	No	SPL_SL_14-413_Initial Notice
Christopher	Sandberg	cksandberg@locklaw.com	LOCKRIDGE GRINDAL NAUEN PLLP	100 Washington Ave S Ste 2200 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-413_Initial Notice
Betty	Sanders	betty.sanders@chartercom.com	Charter Fiberlink, LLC	12405 Powerscourt Drive St. Louis, MO 63131	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jill	Sandford	jill.sandford@zayo.com	Zayo Group, LLC	360 Hamilton Avenue White Plains, NY 10601	Electronic Service	No	SPL_SL_14-413_Initial Notice
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jeff	Schill	jeff.schill@netins.com	Iowa Network Services Inc	4201 Corporate Drive West Des Moines, Iowa 50266	Electronic Service	No	SPL_SL_14-413_Initial Notice
Travis	Schmidt	tschmidt@mpsutility.com	Moorhead Public Service	500 Center Ave. PO Box 779 Moorhead, MN 56561	Electronic Service	No	SPL_SL_14-413_Initial Notice
Bruce	Schoonover	bademailbruce.schoonover@knology.com	Knology of the Plains, Inc.	1241 OG Skinner Dr West Point, GA 31833-1789	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Schornack	N/A	Arrowhead Communications Corporation	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Schornack	N/A	Hector Communications Corporation (H)	(on behalf of Arrowhead Communications Corp) 27 North Minnesota St New Ulm, MN 56073	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Schornack	N/A	Felton Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Schornack	N/A	Loretel Systems, Inc.	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Schornack	N/A	The Peoples Telephone Company of Bigfork	150 2nd St. SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Schornack	N/A	East Otter Tail Telephone Company	150 2nd Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Schornack	N/A	Twin Valley-Ulen Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Schornack	N/A	Callaway Telephone Company	150 Second Street SW Perham, MN 56573	Paper Service	No	SPL_SL_14-413_Initial Notice
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	SPL_SL_14-413_Initial Notice
John	Schultz	jschultz@u-rekabroadband.com	Minnesota Fiber Exchange LLC	176 Rutherford Rd Stillwater, MN 55082	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kevin	Seamans	KEVIN.SEAMANS@BESTBUY.COM	BBY Networks, Inc	7601 Penn Ave. Richfield, MN 55423	Electronic Service	No	SPL_SL_14-413_Initial Notice
Marcia	Seibert Volz	N/A	City of Fairfax	18 1st St. SE PO Box K Fairfax, MN 55332	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Seliga	N/A	FTTH Communications L.L.C.	2930 146th St Ste 105 Rosemount, MN 55068	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark C.	Sexton	msexton@wccaweb.com	Wright County Community Action	130 West Division Street PO Box 787 Maple Lake, MN 55358	Paper Service	No	SPL_SL_14-413_Initial Notice
Omesh	Sharma	Omesh.sharma@clearfly.net	Greenfly Networks, Inc. dba Clearly Communications	PO BOX 77706 San Francisco, CA 94107	Electronic Service	No	SPL_SL_14-413_Initial Notice
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 126 South Main Street Lonsdale, MN 55046-0358	Electronic Service	No	SPL_SL_14-413_Initial Notice
Dawn	Simonson	dawn@tcaging.org	Metropolitan Area Agency on Aging	2365 North McKnight Rd., Ste 3 St. Paul, MN 55109-2264	Paper Service	No	SPL_SL_14-413_Initial Notice
David J.	Smat	regulatory@ingts.com	iNetworks Group, Inc.	Suite 2510 125 S. Wacker Drive Chicago, IL 60606	Electronic Service	No	SPL_SL_14-413_Initial Notice
Don	Snyders	don@alliancecom.net	Alliance Communications Cooperative, Inc.	PO Box 349 612 Third St Garretson, SD 57030	Electronic Service	No	SPL_SL_14-413_Initial Notice
Compliance	Specialist	Compliance@velocity.org	Velocity The Greatest Phone Company Ever, Inc.	7130 Spring Meadows W Dr Holland, OH 43528	Electronic Service	No	SPL_SL_14-413_Initial Notice
William J.	Spitzer	mayor@stcharlesmn.org	City of St. Charles	830 Whitewater Avenue St. Charles, MN 55972	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sabrina	Spruill	bademail_Sabrina@mobilitie.com	Mobilitie, LLC	660 Newport Center Drive, Suite 200 Newport Beach, CA 92660	Paper Service	No	SPL_SL_14-413_Initial Notice
Joseph	Steffel	joseph.steffel@ci.buffalo.mn.us	City of Buffalo Municipal Electric	212 Central Avenue Buffalo, MN 55313	Electronic Service	No	SPL_SL_14-413_Initial Notice
Neal	Steffl	nsteffl@smoc.us	Southwestern MN Opportunity Council, Inc.	1106 - 3rd Avenue, P.O. Box 787 Worthington,, MN 56187	Electronic Service	No	SPL_SL_14-413_Initial Notice
Lance J.M.	Steinhart	info@telecomcounsel.com	Attorney at Law	1725 Windward Concourse Ste 150 Alpharetta, GA 30005	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kate	Stem	BADEMAILkate.stem@accesspointinc.com	Access Point, Inc.	1100 Crescent Green, Ste. 109 Cary, NC 27518	Paper Service	No	SPL_SL_14-413_Initial Notice
Wayne D.	Stenberg	wayne.stenberg@semcac.org	Semcac	204 South Elm PO Box 549 Rushford, MN 559710549	Paper Service	No	SPL_SL_14-413_Initial Notice
Rick	Stern	rstern@nitelusa.com	Network Innovations, Inc. d/b/a Nitel	1101 W Lake St. Chicago, IL 60657	Electronic Service	No	SPL_SL_14-413_Initial Notice
Tim	Stoner	timothy.stoner@belw.org	Blue Earth Light & Water Dept.	125 East Seventh Street Blue Earth, MN 56013	Electronic Service	No	SPL_SL_14-413_Initial Notice
Paul	Stowman	paul@rothsay.us	Rothsay Telephone Company	PO Box 158 137 1st St NW Rothsay, MN 56579-0158	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Wayne	Stowman	wstowman@rtelnet.net	Rothsay Telephone Company	137 1st St NW Rothsay, MN 56579	Electronic Service	No	SPL_SL_14-413_Initial Notice
Ronald	Streyle	ronstreyle@juno.com	Rochester Telecom Systems, Inc.	PO Box 235 Rochester, MN 559030235	Electronic Service	No	SPL_SL_14-413_Initial Notice
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-413_Initial Notice
Keith	Stubbe	tunesrus@iw.net	Southwest Minnesota Broadband Services	PO BOX 1006 Lakefield, MN 56150	Electronic Service	No	SPL_SL_14-413_Initial Notice
Cynthia	Sweet	csweet@acecomgroup.com	Ace Telephone Association	207 East Cedar P.O. Box 360 Houston, MN 559430360	Electronic Service	No	SPL_SL_14-413_Initial Notice
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	SPL_SL_14-413_Initial Notice
Harlan	Tardy	N/A	KOOTASCA Community Action	201 NW 4th St #130 Grand Rapids, MN 55744	Paper Service	No	SPL_SL_14-413_Initial Notice
Harlan	Tardy	harlan.tardy@aeoa.org	Arrowhead Economic Opportunity Agency, Inc.	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL_14-413_Initial Notice
Mike	Theisen		Northern Minnesota Utilities	910 Cloquet Ave. Cloquet, MN 55720	Paper Service	No	SPL_SL_14-413_Initial Notice
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carl	Thompson		PromiseVision Technology, Inc.	#212 1050 E 2nd Edmond, OK 73034	Paper Service	No	SPL_SL_14-413_Initial Notice
Michael	Thorsteinson	mike.thorsteinson@threeiverscap.org	Three Rivers Community Action	1414 North Star Drive Zumbrota, MN 55992	Paper Service	No	SPL_SL_14-413_Initial Notice
Lorren	Tingesdal	lorren@mabeltel.coop	Harmony Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	SPL_SL_14-413_Initial Notice
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	SPL_SL_14-413_Initial Notice
Daniel	Tonder	d.tonder@mnpower.com	Minnesota Power	PO Box 60 Little Falls, MN 56345	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-413_Initial Notice
Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277 Upsala, MN 56384	Electronic Service	No	SPL_SL_14-413_Initial Notice
Brad	VanLeur	bvanleur@orbitcominc.net	OrbitCom, Inc.	1701 North Louise Avenue Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_14-413_Initial Notice
William	VanderSluis	regulatory@hickorytech.com	Enventis Telecom, Inc.	221 E Hickory St Mankato, MN 56001-3610	Electronic Service	No	SPL_SL_14-413_Initial Notice
William	VanderSluis	N/A	Mankato Citizens Telephone Company	221 E. Hickory Street PO Box 3248 Mankato, MN 56002-3248	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William	VanderSluis	N/A	Crystal Communications, Inc.	221 E. Hickory Street Mankato, MN 56001	Paper Service	No	SPL_SL_14-413_Initial Notice
William	VanderSluis	N/A	Heartland Telecommunications Company of Iowa	221 East Hickory Street SW Mankato, MN 56001	Paper Service	No	SPL_SL_14-413_Initial Notice
William	VanderSluis	N/A	CP Telecom	209 W 1st St Duluth, MN 55802	Paper Service	No	SPL_SL_14-413_Initial Notice
Charlie	Vig	N/A	Shakopee Mdewakanton Sioux Community	2330 Sioux Trail Prior Lake, MN 55372	Paper Service	No	SPL_SL_14-413_Initial Notice
Patricia	Voorhees	regulatory@matrixbt.com	Touch 1 Communications, Inc.	7171 Forest Lane suite 700 Dallas, TX 75230	Electronic Service	No	SPL_SL_14-413_Initial Notice
Lori	Vrolson	lori@cmcoa.org	Central Minnesota Council on Aging	1301 W St. Germain St., Suite 101 St. Cloud, MN 56301-3456	Paper Service	No	SPL_SL_14-413_Initial Notice
Dana	Wahlberg	dana.wahlberg@state.mn.us	Department of Public Safety	Town Square Ste 137 444 Cedar St St. Paul, MN 551015126	Electronic Service	No	SPL_SL_14-413_Initial Notice
Darle	Waldner	darla@nwrdc.org	Land of the Dancing Sky AAA	109 South Minnesota Street Warren, MN 56762-1428	Paper Service	No	SPL_SL_14-413_Initial Notice
Anthony T.	Ward	atward@grpuc.org	Public Utilities Commission	P O Box 658 500 SE 4th Street Grand Rapids, MN 55744	Electronic Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karl	Wardin	ww3587@att.com	AT&T Corp	225 W Randolph St, 27C350 Chicago, IL 60606	Electronic Service	No	SPL_SL_14-413_Initial Notice
David	Wareikis	dwareikis@bluejaywireless.com	Blue Jay Wireless, LLC	5010 Addison Circle Addison, TX 75001	Electronic Service	No	SPL_SL_14-413_Initial Notice
Jerry	Watts	jerry.watts@corp.earthlink.com	EarthLink	Suite 106 3000 Columbia House Blvd. Vancouver, WA 98661	Electronic Service	No	SPL_SL_14-413_Initial Notice
Avi	Weisman		Gold Line Telemanagement Inc.	180 West Beaver Creek Rd Richmond Hill, ON L4B 1B4 CANADA	Paper Service	No	SPL_SL_14-413_Initial Notice
Kent	Westphal	kwestphal@mypremieronline.com	Northern Iowa Telephone Company	PO Box 200 339 1st Ave E Sioux Center, IA 51250	Electronic Service	No	SPL_SL_14-413_Initial Notice
Bruce	White	bademaillscovill@telecomsys.com	Telecommunication Systems	275 West Street Annapolis, MD 21401	Paper Service	No	SPL_SL_14-413_Initial Notice
Mary	Whiting	mwhiting@corp.earthlink.com	EarthLink Business, LLC	2610 Horizon Dr Ste B Grand Rapids, MI 49546	Electronic Service	No	SPL_SL_14-413_Initial Notice
Tom	Wierimaa	N/A	Mosaic Networx LLC	454 Las Gallinas Ave Ste 145 San Rafael, CA 94903	Paper Service	No	SPL_SL_14-413_Initial Notice
Ray H.	Wigern		Wells Public Utilities	101 First Street SE PO Box 96 Wells, MN 56097	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	SPL_SL_14-413_Initial Notice
Sandra	Williams	sandrawilliams@netoneint.com	Net One International, Inc.	6933 University Blvd. Winter Park, FL 32792-6707	Electronic Service	No	SPL_SL_14-413_Initial Notice
Lyle R.	Williamson	Lyle.Williamson@Verizon.com	Verizon Wireless	8350 E Crescent Pkwy Ste 200 Greenwood Village, CO 80111	Electronic Service	No	SPL_SL_14-413_Initial Notice
Karrie	Willis	kwillis@popp.com	POPP.com, Inc.	620 Mendelssohn Ave N Golden Valley, MN 55427	Electronic Service	No	SPL_SL_14-413_Initial Notice
David	Wolf	dwolf@gctel.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	SPL_SL_14-413_Initial Notice
Cliff	Woodbury	cliff.woodbury@ies911.com	Independent Emergency Services LLC	235 Franklin St SW Hutchinson, MN 55350-0279	Electronic Service	No	SPL_SL_14-413_Initial Notice
John T.	Woodwick	john@mnvac.org	Minnesota Valley Action Council	706 North Victory Drive Mankato, MN 56001	Paper Service	No	SPL_SL_14-413_Initial Notice
Lezlie	Young	lezlie.p.young@windstream.com	Talk America Inc.	4001 N. Rodney Parham Rd. Little Rock, AR 72212	Electronic Service	No	SPL_SL_14-413_Initial Notice
Kathy	Zacher	citykaz@acegroup.cc	City Of Rushford	101 N. Mill St. PO Box 430 Rushford, MN 55971	Electronic Service	No	SPL_SL_14-413_Initial Notice
Richard	Zierdt	N/A	Community Action Partnership	of Suburban Hennepin 8800 Highway 7, Suite 401 St. Louis Park, MN 55426	Paper Service	No	SPL_SL_14-413_Initial Notice

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-413_Official
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_14-413_Official
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_14-413_Official
Ron	Elwood	relwood@mnlsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_14-413_Official
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-413_Official
Deborah L.	Kuhn	deborah.kuhn@verizon.com	VERIZON	Suite 700 205 North Michigan Avenue Chicago, IL 60601	Electronic Service	No	OFF_SL_14-413_Official
John	Lindell	agorud.ecf@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_14-413_Official