

Staff Briefing Papers

Meeting Date	September 21, 2023	Agenda Item 1**
Company	Local Exchange Carriers, Eligible Telecommunications Carriers	
Docket No.	P999/PR-23-8	
	In the Matter of Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of the Federal Universal Service Support Required Pursuant to C.F.R. 54.313	
Issue(s)	Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314?	
Staff	Marc Fournier	Marc.Fournier@state.mn.us 651-201-2214

 Relevant Documents	Date
Comments of the Minnesota Department of Commerce	August 23, 2023
Reply Comments of LTD Broadband	August 30, 2023

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

I. Statement of the Issues

1. Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314?

II. Background

In this proceeding, the Minnesota Public Utilities Commission (Commission) is asked to certify 105 eligible telecommunications carriers (ETCs) and another seven ETCs (which could be certified by another state Commission)¹ after review of each Company's FCC Form 481.

Under the Federal Telecommunications Act of 1996, telecommunications carriers must be designated ETCs to qualify for subsidies from the federal Universal Service Fund for serving high-cost areas or low-income consumers.² State regulatory commissions have primary responsibility for designating ETCs, although the Federal Communications Commission (FCC) acts on designation requests from carriers who are not subject to state commission jurisdiction.

Each year, the Commission and all state commissions must certify that ETCs receiving High-Cost Funds are using the funds received in the previous year (2022 in this proceeding) and will use the funds in the coming year (2024 in this proceeding), only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Since 2001, states have filed annual certification of FCC Form 481 compliance filings by ETCs regarding high-cost program support from the Universal Service Fund (USF). All companies filing FCC Form 481 under 47 C.F.R. 54.313 are normally certified by the Commission and Commission Staff enters the Commission's action via the Universal Service Administrative Company (USAC) electronic certification roster and by sending a hardcopy to the FCC by USPS as per federal practice. The Commission does this under authority delegated in 47 C.F.R. 54.314. Wireless companies filing FCC Form 481 under 47 C.F.R. 54.422 do so for the Commission's information only. Those wireless companies are appropriately not listed on the USAC verification system and not certified by the Commission to the FCC.

In 2022, the USAC distributed **\$168,461,938.77** to Minnesota ETCs to mitigate high costs in the provision of voice and broadband services from nine different High-Cost Program funds. Under these high-cost programs, companies must build out to several locations in given census blocks.³ Each year, through the required filing of FCC Form 481, companies receiving high-cost funds report information, including an affidavit that the company meets certain FCC requirements. The Minnesota Commission requires each company seeking certification to include a separate affidavit from a company officer confirming that funds are used appropriately.

¹ These are ETCs serving Minnesota customers that primarily operate in other states. The other states would likely certify the ETCs listed in Table 2 below, but the Commission could also certify these ETCs out of an abundance of caution, guarding against the possibility that some other state might fail to grant certification in time.

² [47 U.S.C. § 214\(e\)\(1\)](#).

³ Census blocks are "statistical areas bounded by visible features, such as streets, roads, streams, and railroad tracks, and by nonvisible boundaries, such as selected property lines and city, township, school district, and county limits and short line-of-sight extensions of streets and roads."

(https://transition.fcc.gov/form477/Geo/more_about_census_blocks.pdf)

On November 8, 2022, the Commission issued an Order Recertifying Eligible Telecommunications Carriers and Setting Additional Requirements, in Docket No. P999/PR-22-8. In that Order, the Commission took the following actions:

- 1) Connect America Fund Phase II (CAF II) and Rural Digital Opportunity Fund (RDOF) funding recipients must file performance measurement (PM) testing results with all future 481 filings,
- 2) ETCs must continue filing quarterly updates on Tribal Engagement Practices, Quarterly updates for January, April, July, and October must be filed under the docket number for the current year,
- 3) The Commission adopts the Best Practices Recommendations for Tribal Engagement, as shown in Attachment 1 of the Department's September 29, 2022 Report in docket 22-8, and
- 4) Each annual filing, beginning in 2023, must include a narrative of how the ETC comports with the Best Practices Recommendations for Tribal Engagement.

Comments on the ETC filings were filed on August 23, 2023 by the Minnesota Department of Commerce (DOC or Department). Reply comments were filed by LTD Broadband on August 30, 2023.

III. Parties' Comments

1. Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314? and 2. In the event a high cost ETC has not filed an executed affidavit, should the Commission require an executed affidavit be filed as a replacement?

Department

The Department stated the following:

The Minnesota Commission is required to annually certify that "all federal high-cost support provided to [ETCs] within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to" 47 CFR 54.314(a). The FCC's 481 Form is the primary informational tool used in the certification process, but additional information is relevant in determining whether an ETC should be granted certification.⁴

Tables Attached to the Department Comments⁵

Attached to the Department's comments are six tables, the first five of which follow the Commission's October 21, 2021, Order Certifying Eligible Telecommunications Carriers' Use of Federal High-Cost Subsidy in Docket P999/PR-21-8.

⁴ Please see Department August 23, 2023, Comments at page 8.

⁵ Please see Department August 23, 2023, Comments at Attachment A pp. i-ix.

Table 1 lists the Minnesota High Cost ETCs that the Commission should certify, consistent with the Department's recommendation in the current docket. The Department recommends that the Commission certify the ETCs listed in Table 1.

Table 2 lists the high-cost ETCs that will be certified by other states but could also be certified by the Minnesota Commission.

Table 3 has been reserved for high-cost ETCs where there is a recommendation against certification by the Department.

Table 4 lists Minnesota high-cost ETCs for which the Commission has no action item, but the carriers have requested that the Commission certify the company.⁶ The ETCs filed 481 forms in the current docket but received no high-cost funding during the calendar year 2022 and are not on USAC's list of carriers needing certification this year.

Table 5 lists carriers who, along with their associated Study Area Codes (SACs), are no longer operational, but whose SACs are still listed in certain USAC spreadsheets.⁷ The Department has left Table 5 blank.

Table 6 lists carriers who are non-high-cost ETCs that do not receive high-cost support and do not require certification. These carriers have Lifeline-only designation and offered Lifeline benefits to Minnesota customers during the calendar year 2022.

2. Should the Commission certify LTD Broadband for CAF II Funding Program?⁸

Department

The Department stated the following:

In August 2022, LTD's RDOF award was rejected by the FCC on the basis that its long-form application was deficient. LTD filed an Application for Review (AFR) with the FCC, but the FCC is under no obligation to accept or reject their appeal within any specific timeline. These events at the federal level have left residents of the 102,005 Minnesota locations in limbo for broadband and voice services that had been scheduled to be deployed with federal USF dollars.

⁶ Carriers in Table 4 sent emails to the Department, around July 5, 2023 and July 6, 2023 requesting certification even though they received no high-cost funds during the year 2022. These carriers having various reasons for requesting certification, from the Minnesota Public Utilities Commission for the year 2022. Primary among the reasons they have provided to the Department is the need for Minnesota Public Utilities Commission certification to participate in other FCC programs, such as the Lifeline and Affordable Connectivity Programs.

⁷ A Study Area Code (SAC) is a unique number that USAC assigns to eligible telecommunication carriers (ETCs) that uniquely identifies that company based on its service area. Companies must have at least one SAC per state in which they operate, but can have more than one SAC within a state if they have more than one service area. (<https://www.usac.org/lifeline/get-started/join-lifeline-as-an-etc/>)

⁸ Connect America Fund (CAF) Phase II Auction, commonly called "CAF II Auction," provides support to carriers to deliver service in areas where the incumbent price cap carrier didn't accept previous [CAF Phase II](#) funding and in extremely high-cost areas located within the service areas of the incumbent price cap carriers. (<https://www.usac.org/high-cost/funds/caf-phase-ii-auction/>)

The locations are once again eligible for state and federal funding, but until and unless a decision is made on the AFR, the risk of reversal makes planning precarious and undesirable for any other broadband provider. Due to this uncertainty, the Minnesota Telecommunications Association (MTA) and Minnesota Rural Electric Association (MREA) jointly commenced an action (Docket No. 22-221 or LTD Docket) to revoke the LTD ETC designation for the Minnesota RDOF locations.

While the two dockets are intertwined, certification in this docket and the outcome of the LTD Docket are separate, independent, and rely on different depth of analyses. Federal ETC certification limits the Commission to review of the ETCs' attestations as to proper use of USF distributions, advertising, and outreach. The Telecommunications Act and subsequent federal guidance, however, encourages states to look deeper into potential ETCs when considering ETC designation, which is the heart of the matter in the LTD Docket.

LTD did not receive high-cost funding for calendar year 2022 and is not on USAC's list of carriers that need certification this year, however, the company requested that the Commission certify. Given that USAC does not require an LTD certification decision this year, the Department recommends deferring a decision on LTD's ETC re-certification to the LTD Docket. An explanatory statement consistent with the situation in the LTD Docket will prevent confusion at the state and federal levels in this docket and in the LTD Docket.⁹

Reply of LTD

LTD responded to the Department by stating the following:

LTD has neither received nor been approved to receive RDOF support at this time. The affidavit it filed in July is unrelated to the LTD RDOF Docket, and DOC is mistaken in seeking to tie these proceedings together. DOC apparently understands this, as Attachment A (Table 3) to the DOC Comments correctly states the Study Area Code ("SAC") assigned to LTD's CAF II authorization.¹⁰ (The FCC has not assigned a SAC to LTD's RDOF area because it has not been authorized to receive RDOF support.) To the extent that questions have been raised regarding LTD's potential authorization for RDOF funding, they relate to the scope of deployment proposed under that program specifically and have no impact on the CAF II program. CAF II and RDOF are distinct USF support programs, and LTD is designated as an ETC in Minnesota at different locations with respect to each program. LTD is performing as

⁹ Please see Department August 23, 2023, Comments on pages 16-17. Additionally, in footnote 9 on page 3 of the May 6, 2022, MTA and MREA's (Petitioners') Petition to revoke LTD Broadband's RDOF ETC designation in Docket No. 22-221, the Petitioners clearly indicated that the Petition applies only to the expanded ETC designation LTD received in the LTD Expansion Order issued June 3, 2021, and does not apply to LTD's initial designation for CAF II funding that LTD received on February 8, 2019.

Staff notes that the Department's portrayal of the facts is inaccurate. Staff has verified that LTD Broadband is on USAC's list of carriers that require certification this year. LTD is on the list because it is currently receiving funds under the FCC's CAF II funding program and was certified last year by this Commission to receive CAF II funding (Please see Commission's November 8, 2022, Order Recertifying Eligible Telecommunications Carriers and Setting Additional Requirements Attachment A at p. ii in Docket No. P-999/PR-22-8).

¹⁰ A Study Area Code (SAC) is a unique number that USAC assigns to eligible telecommunication carriers (ETCs) that uniquely identifies that company based on its service area. Companies must have at least one SAC per state in which they operate, but can have more than one SAC within a state if they have more than one service area. (<https://www.usac.org/lifeline/get-started/join-lifeline-as-an-etc/>)

required in meeting its CAF II performance obligations and deployment milestones and continues to construct new infrastructure to meet the needs of unserved and underserved populations, including those in Minnesota. LTD's affidavit presents no basis for a finding that the Commission should refuse to re-certify LTD.

The LTD RDOF Docket does not in any way involve LTD's CAF ETC designation. The DOC readily admits that "certification in this docket and the outcome of the [LTD RDOF Docket] are separate, independent, and rely on different depth of analyses." The only justification that it offers as a countervailing basis for nonetheless treating these two distinct proceedings as connected is its contention that federal law encourages it "to look deeper into potential ETCs when considering ETC designation." But LTD is already an established ETC and has submitted its affidavit in performance of its existing ETC obligations relating to CAF II support. Looking deeper does not mean that DOC can simply intertwine LTD's separate ETC designations into an ongoing proceeding involving only the RDOF ETC designation, particularly when there is no depth of analysis provided (indeed, no analysis at all) establishing any basis to connect the two matters.

Additionally, DOC cites no defect in LTD's July affidavit that could justify withholding ETC certification, but instead opines that "USAC does not require an LTD certification this year" because it "did not receive high-cost funding for calendar year 2022." But this bare statement ignores the scope of the Commission's 2018 ETC Certification Order, which provides that the required affidavit must cover much more than just use of funds during the prior calendar year, including certifications with respect to potential use of funds in the coming year, compliance with applicable rules on service quality and consumer protection, and capabilities with respect to backup power and traffic management. Arbitrarily withholding certification for LTD, and LTD alone, would call into question without basis the entirety of LTD's ETC compliance certification for 2023.

Finally, LTD stated the vaguely articulated position that DOC has taken in its Comments is prejudicial to LTD's continued status as an ETC for purposes of the CAF II program. DOC's opaque assertion that an "explanatory statement consistent with the situation in the LTD Docket will prevent confusion" is unsupported by any substantive discussion or evidence and indeed would create significant confusion where there currently is none. Both the suggested conflation of this docket with the separate LTD RDOF Docket and the proposed withholding of ETC certification for 2023 would be improper and prejudicial. Accordingly, the Commission should re-certify LTD's ETC designation with respect to SAC 369047.¹¹

3. Should the Commission order all high-cost funding ETCs to submit Performance Measure (PM) Testing results with all future 481 filings?

Department

The Department stated the following:

Commerce identified 19 carriers in Minnesota that received funding through one or more of these USF programs and were required to report PM results to USAC in 2023. To protect proprietary information, Department Staff asked each company through information

¹¹ Please see LTD Broadband's August 30, 2023 reply comments at pages 2-3.

requests (IRs) to share the summary results of their reporting. Commerce also asked if each company had been warned or fined due to the inability to meet a program's performance requirements. If a company did not need to report PM results, Commerce asked for the reason.

Four price-cap carriers, that shared PM testing and reporting results in 2022, received IRs this year: CenturyLink, Frontier, Windstream, and Consolidated. In keeping with the Commission's Notice of Compliance Filing Period dated May 25, 2023, all that accepted CAF II funding responded promptly to Commerce IRs related to PM testing results. Responses indicated none were penalized for failure to report required results or for inability to meet performance standards.

Consolidated Communications and Frontier indicated that USAC did not require either to report PM results in 2023. Consolidated and Windstream Lakedale stated that both had successfully finished required CAF II reporting in 2021. Consolidated went on to state that it will not be required to begin additional reporting until 2025. CenturyLink also completed required CAF II PM testing and reporting; USAC deemed the company 100% compliant. Frontier confirmed that it did not receive universal service support in 2022, ending its obligation to engage in PM testing and reporting in 2021.

The following companies received USF funding through the ACAM¹² or RBE¹³ Programs and, based on USAC reporting results, Commerce has no concerns regarding their USF PM obligations:

- Arvig Telephone Company
- Blue Earth Valley/BevComm
- Christensen Communications
- Dunnell Telephone Company
- East Otter Tail Telephone Company
- Interstate Telecommunications
- Mabel Telephone Cooperative
- Minnesota Valley, Telephone Company
- New Ulm Telecom, Inc.
- Northern Telephone Company
- Park Region Mutual Telephone Company
- Paul Bunyan Rural Telephone Cooperative
- Rothsay Telephone Company
- Sacred Heart Telephone Company
- Wikstrom Telephone Company

The only deviation from 100% (or nearly 100%) compliance for ACAM recipients was one company. From January – April 2022, funding was temporarily withheld, because the

¹² The Alternative Connect America Cost Model (ACAM) provides funding to rate-of-return carriers that voluntarily elected to transition to a new cost model for calculating High Cost support in exchange for meeting defined broadband build-out obligations. (<https://www.usac.org/high-cost/funds/acam/>)

¹³ The Rural Broadband Experiments (RBE) provides funding for experiments in price-cap areas to bring robust, scalable broadband networks to residential and small business locations in rural communities. (<https://www.usac.org/high-cost/funds/rural-broadband-experiments/>)

company did not meet performance standards. The Company, however, states that problems have been corrected, the Company is now in 100% compliance, and funding has been restored.¹⁴

The Department continued:

The Department believes sharing PM testing results is not burdensome for ETCs. Companies must collect and report the data for USAC and can easily share the same information with the Department and Commission. Providing the same information to state commissions, that companies are already required to produce for submission to USAC, is not an excessive burden to ETCs. This year, all 19 carriers promptly responded to Commerce IRs with PM compliance reporting results they had received from USAC. No carriers reported difficulties with providing this information.

In 2022, the Commission adopted Commerce's recommendation and decided that high-cost carriers that received CAF II and RDOF program funds should report PM testing results in future 481 filings. CAF II testing obligations are phasing out as high-cost carriers complete deployments and meet milestones. Minnesota ETCs have received funding from other USF programs that require PM results reporting – ACAM, ACAM Revised, ACAM II, RBE, CAF II Auction, and CAF BLS – and monitoring of PM test results is a way to ensure the Commission meets its obligation to help monitor use of ratepayer funds. Additionally, all high-cost ETCs will meet the same reporting requirements if all must share PM testing results with the Commission.

Commerce recommends that the Commission order all high-cost ETCs to share PM testing results with the Commission as part of future 481 filings.¹⁵

3. Should the Commission continue to require quarterly filings of Tribal engagement from the ETCs for the foreseeable future?

Department

The Department stated the following:

Quarterly updates from ETCs are the primary tools used to help the Department evaluate the efforts of each company as they respond to concerns and requests of the Tribe(s). The Department also relies on email correspondence and calls with companies to discuss questions and concerns as they arise. To date, each provider has submitted quarterly reports. In general, the engagement between ETCs and Tribes is consistent, with the majority of ETCs sending quarterly correspondence to their primary points of contact and engaging in calls and in-person meetings, when requested.

In its November 8, 2022, Order in Docket No. P999/PR-22-8, the Minnesota Commission adopted the Best Practices Recommendations for Tribal Engagement and directed each ETC that serves Tribal lands to file quarterly updates to memorialize its ongoing efforts to reach out to the tribe(s). These reports are due each year on the first day of January, April, July (as

¹⁴ Please see Department's August 23, 2023, comments at pages 12-13.

¹⁵ Please see Department's August 23, 2023, comments at pages 13-14.

part of the annual filing of Form 481), and October. The plans must include: (a) the carrier's plan to address the individual reporting requirements in form 481 from the FCC, (b) the name, position, and contact information of the person primarily responsible for tribal engagement, and (c) the ongoing duties that person will have with respect to tribal engagement. The Department recommends that the Commission continue to require quarterly filings of Tribal engagement from the ETCs for the foreseeable future.

The Department will comment on these quarterly filings separately from the current comments.¹⁶

IV. Staff Analysis

For Minnesota High-Cost Program ETCs to be eligible for support, the Commission must file an annual certification with the FCC and USAC by October 1st of each year certifying that High-Cost Program funds were used in the previous year, and will be used in the coming year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. If the Commission submits its certification after October 1st of this calendar year, the Minnesota High-Cost Program ETCs may incur funding reductions.

In so far as this annual review is a ministerial duty delegated to the Commission by the FCC, Staff concurs that each of the 105 companies requesting certification appear to have met the filing requirements. Please see Tables 1, 2 and 4 of Attachment A of the Department's August 23, 2023, comments or Tables 1, 2, and 4 of Attachment A of this document for the list of ETCs requiring Commission certification.¹⁷

With respect to Table 3, the Department is recommending that the Commission not certify LTD Broadband for this Company to receive grant funding under the FCC's Connect America Fund II (CAF II) program. Given that the CAF II and RDOF programs are separate and distinct from one another, Staff suggests that the Commissioners request the Department to provide the complete rationale for the recommendation that LTD not be certified for CAF II. As stated in footnote 9 above, Staff notes the Department's portrayal of the facts is inaccurate and that LTD is on the USAC's ETC certification list because the company is currently receiving funds under the CAF II program.

Regarding the Department's proposal to require that ETCs provide the results of Performance Measurements (PM) as part of their annual filings of FCC Form 481, Staff suggests that the Commission ask the parties to clarify this matter at the meeting.

With respect to Tribal engagement, Staff notes that no party raised concerns regarding the Departments proposals. However, Staff notes that over time circumstances regarding the relationship between the Tribes and the carriers may change. These changes may reduce the continued relevance of these reports. As such, it would be prudent for the Commission to annually review the efficacy of continuing both the quarterly and annual filings.

¹⁶ Please see Department's August 23, 2023, Comments on page 14.

¹⁷ Attachment A of the Staff briefing document was prepared by the Department of Commerce.

Decision Options

Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314?

1. Certify all companies as indicated in Tables 1, 2, and 4 of Attachment A of the staff briefing papers (*Department*).

OR

2. Recertify all companies as indicated in Tables 1, 2, and 4 of Attachment A of the staff briefing papers except for the following, which shall not be recertified: *[specify any ETCs that are not being recertified]*.

AND

3. Provide USAC with a list of carriers (including their SACs) that should be certified in a letter to the FCC (*Department*).

Should the Commission certify LTD Broadband for CAF II Funding Program?

4. Certify LTD Broadband to continue to receive CAF II funding as was done by the Commission in Docket No. P999/PR-22-8.

OR

5. Do not certify LTD Broadband to continue to receive CAF II funding and defer certification on this carrier (*Department*).

Should the Commission order all high-cost funding program ETCs to submit Performance Measure (PM) Testing results with all future 481 filings?

6. Require all high-cost funding recipients to submit Performance Measure (PM) Testing results with all future 481 filings (*Department*).

OR

7. Do not require all high-cost funding recipients to submit Performance Measure (PM) Testing results with all future 481 filings.

Should the Commission continue to require quarterly filings of Tribal engagement from the ETCs consistent with the requirements in the Commission's October 21, 2021 and November 8, 2022 Orders?

8. Continue to require quarterly filings of Tribal engagement from the ETCs consistent with the requirements in the Commission's October 21, 2021 and November 8, 2022 Orders. (*Department*)

OR

9. Discontinue the requirement for quarterly filings of Tribal engagement from the ETC.

Attachment A

2023 Eligible Telecommunications Carriers for Certification by the Minnesota Public Utilities Commission

I. HIGH-COST ETCs THAT THE MINNESOTA PUBLIC UTILITIES COMMISSION SHOULD CERTIFY

The eligible telecommunications carriers ("ETC") listed below are included on Minnesota's federal Universal Service High-Cost Program ("High-Cost Program") certification list and should be certified by the Minnesota Public Utilities Commission ("Commission").

Table 1 Minnesota High-Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (YIN)
1	361346	ACE TEL ASSN-MN	MN	ILEC	y
2	361347	ALBANY MUTUAL ASSN	MN	ILEC	y
3	369055	AMG TECHNOLOGY INVESTMENT GROUP, LLC D/B/A NEXTLINK INTERNET	MN		y
4	361374	ARROWHEAD COM CORP	MN	ILEC	y
5	361350	ARVIGTELCO	MN	ILEC	y
6	369051	ARROWHEAD ELECTRIC COOPERATIVE	MN	CLEC	y
7	361356	BENTON COOP TEL CO	MN	ILEC	y
8	361358	BLUE EARTH VALLEY	MN	ILEC	y
9	361362	BRIDGEWATER TEL CO	MN	ILEC	y
10	369043	BROADBAND CORP	MN	CETC	y
11	361365	CALLAWAY TEL CO	MN	ILEC	y
12	361440	CANNON VLY TELECOM	MN	ILEC	y
13	361425	CHRISTENSEN COMM CO	MN	ILEC	y
14	361353	CITY OF BARNESVILLE	MN	ILEC	y
15	361370	CLARA CITY TEL EXCH	MN	ILEC	y
16	361372	CLEMENTS TEL CO	MN	ILEC	y
17	361373	CONSOLIDATED TEL CO	MN	ILEC	y
18	369044	CONSOLIDATED TELEPHONE COMPANY	MN	CETC	y
19	361499	CROSSLAKE TEL CO	MN	ILEC	y
20	361381	DUNNELL TEL CO	MN	ILEC	y
21	361383	EAGLE VALLEY TEL CO	MN	ILEC	y
22	361385	EAST OTTER TAIL TEL	MN	ILEC	y
23	361384	EASTON TEL CO	MN	ILEC	y
24	361386	ECKLES TEL CO	MN	ILEC	y
25	361387	EMILY COOP TEL CO	MN	ILEC	y
26	361389	FARMERS MUTUAL TEL	MN	ILEC	y
27	369020	FARMERS MUTUAL TELEPHONE COMPANY	MN	ILEC	y
28	361390	FEDERATED TEL COOP	MN	ILEC	y

**2023 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 1 Minnesota High-Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (YIN)
29	366130	FEDERATED TELEPHONE COOPERATIVE	MN	CETC	y
30	361403	FEDERATED UTILITIES	MN	ILEC	y
31	361391	FELTON TEL CO. INC.	MN	ILEC	y
32	361395	GARDEN VALLEY TEL CO	MN	ILEC	y
33	369039	GARDEN VALLEY TELEPHONE COMPANY	MN	CETC	y
34	361396	GARDONVILLECOOPTEL	MN	ILEC	y
35	361399	GRANADA TEL CO	MN	ILEC	y
36	361401	HALSTAD TEL CO	MN	ILEC	y
37	369040	HALSTAD TELEPHONE COMPANY	MN	CETC	y
38	361404	HARMONY TEL. CO.	MN	ILEC	y
39	361405	HILLS TEL CO, INC	MN	ILEC	y
40	361408	HOME TEL CO - MN	MN	ILEC	y
41	361409	HUTCHINSON TEL CO	MN	ILEC	y
42	361654	INTERSTATE TELECOMM.	MN	ILEC	y
43	369041	INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC.	MN	CETC	y
44	369038	JAGUAR COMMUNICATIONS, INC.	MN	CETC	y
45	361410	JOHNSON TEL CO	MN	ILEC	y
46	361412	KASSON & MANTORVILLE	MN	ILEC	y
47	361419	LISMORE COOP TEL CO	MN	ILEC	y
48	361422	LONSDALE TEL CO	MN	ILEC	y
49	361443	LORETEL SYSTEMS INC	MN	ILEC	y
50	361424	MABEL COOP TEL - MN	MN	ILEC	y
51	361426	MANCHESTER-HARTLAND	MN	ILEC	y
52	361427	MANKATO-HICKORYTECH	MN	ILEC	y
53	361430	MELROSE TEL CO	MN	ILEC	y
54	361375	MID-COMM-HICKORYTECH	MN	ILEC	y
55	369015	MIDCONTINENT COMMUNICATIONS	MN	CETC	y
56	361413	MID STATE DBA KMP	MN	ILEC	y
57	361433	MID STATE TEL CO	MN	ILEC	y
58	361431	MIDWEST TEL CO	MN	ILEC	y
59	361439	MINNESOTA VALLEY TEL	MN	ILEC	y
60	361442	NEW ULM TELECOM, INC	MN	ILEC	y
61	361500	NORTHERN TEL CO - MN	MN	ILEC	y

**2023 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 1 Minnesota High-Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (YIN)
62	361448	OSAKIS TEL CO	MN	ILEC	y
63	361450	PARK REGION MUTUAL	MN	ILEC	y
64	361451	PAUL BUNYAN RURAL	MN	ILEC	y
65	366132	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	MN	CETC	y
66	366133	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	MN	CETC	y
67	361453	PEOPLES TEL CO - MN	MN	ILEC	y
68	361454	PINE ISLAND TEL CO	MN	ILEC	y
69	365142	QWEST CORP-MN	MN	ILEC	y
70	369054	RED RIVER TELEPHONE COMPANY dba RED RIVER	MN	ILEC	y
71	361472	REDWOOD COUNTY TEL	MN	ILEC	y
72	369045	ROSEAU ELECTRIC COOPERATIVE, INC.	MN	CETC	y
73	361474	ROTHSAY TEL CO, INC	MN	ILEC	y
74	361475	RUNESTONE TEL ASSN	MN	ILEC	y
75	361423	RUNESTONE TELEPHONE ASSOCIATION	MN	ILEC	y
76	361476	SACRED HEART TEL CO	MN	ILEC	y
77	369052	SAVAGE COMMUNICATIONS		CETC	y
78	361479	SCOTT RICE - INTEGRA	MN	ILEC	y
79	361483	SLEEPY EYE TEL CO	MN	ILEC	y
80	361485	SPRING GROVE COOP	MN	ILEC	y
81	361487	STARBUCK TEL CO	MN	ILEC	y
82	361491	TWIN VALLEY-ULEN TEL	MN	ILEC	y
83	361494	UPSALA COOP TEL ASSN	MN	ILEC	y
84	361495	VALLEY TEL CO - MN	MN	ILEC	y
85	361501	WEST CENTRAL TEL	MN	ILEC	y
86	369042	WEST CENTRAL TELEPHONE ASSOCIATION	MN	CETC	y
87	361502	WESTERN TEL CO	MN	ILEC	y
88	361505	WIKSTROM TEL CO, INC	MN	ILEC	y
89	369046	WIKSTROM TELEPHONE COMPANY	MN	CETC	y
90	361348	WILDERNESS VALLEY	MN	ILEC	y
91	361414	WINDSTREAM COMMUNICATIONS, INC.	MN	ILEC	y

**2023 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 1 Minnesota High-Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (YIN)
92	361337	WINNEBAGO COOP ASSN	MN	ILEC	y
93	369029	WINNEBAGO COOPERATIVE TELECOM ASSOCIATION	MN	ILEC	y
94	361507	WINSTED TEL CO	MN	ILEC	y
95	361508	WINTHROP TEL CO	MN	ILEC	y
96	361512	WOLVERTON TEL CO	MN	ILEC	y
97	361510	WOODSTOCK TEL CO	MN	ILEC	y
98	361515	ZUMBROTA TEL CO	MN	ILEC	y

**2023 Eligible Telecommunications Carriers for Certification
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Table 2 High-Cost ETCs that are likely to be Certified by Other States but Could Also be Certified by the Commission					
No.	SAC	Carrier Name	Certifying State	Carrier Type	Certification (YIN)
1	330950	CENTURYTEL OF NW WI	WI	ILEC	Optional
2	351126	CENTURYTEL - CHESTER	IA	ILEC	Optional
3	381614	POLAR TELECOMM.	ND	ILEC	Optional
4	381630	POLAR COMM MUT AID	ND	ILEC	Optional
5	381631	RED RIVER TELEPHONE	ND	ILEC	Optional
6	391405	HILLS TEL CO-SD	SD	ILEC	Optional
7	391657	SPLITROCK TELECOM COOPERATIVE INC.	SD	ILEC	Optional

**2023 Eligible Telecommunications Carriers for Certification
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Table 3 ETCs that the Commission Should Not Certify					
No.	SAC	Carrier Name	Certifying State	Carrier Type	Certification (YIN)
1	369047	LTD Broadband, LLC	MN	CLEC	N

**2023 Eligible Telecommunications Carriers for Certification
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Table 4 Minnesota High-Cost ETCs not requiring certification, but filing information			
No.	SAC	Carrier Name	Certification (YIN)
1	361445	CENTURYTEL-MINNESOTA	<i>Requested certification, but not included on USAC list, so requires a letter</i>
2	361123	CITIZENS-FRONTIER-MN	<i>Requested certification, but not included on USAC list, so requires a letter</i>
3	367123	CITIZENS-FRONTIER-MN	<i>Requested certification, but not included on USAC list, so requires a letter</i>
4	361456	EMBARQ MINNESOTA	<i>Requested certification, but not included on USAC list, so requires a letter</i>
5	361367	FRONTIER MN	<i>Requested certification, but not included on USAC list, so requires a letter</i>
6	369007	TEKSTAR COMMUNICATIONS, INC.	<i>Requested certification, but not included on USAC list, so requires a letter</i>
7	361482	WINDSTREAM COMMUNICATIONS, INC.	<i>Requested certification, but not included on USAC list, so requires a letter</i>

**2023 Eligible Telecommunications Carriers for
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Table 4 Minnesota High-Cost ETCs not requiring certification, but filing information			
No.	SAC	Carrier Name	Certification (YIN)
8	369021	FEDERATED TELEPHONE COOPERATIVE	<i>Requested certification, but not included on USAC list, so requires a letter</i>
9	369030	AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>
10	369049	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	<i>Requested certification, but not included on USAC list, so requires a letter</i>
11	369050	GARDEN VALLEY TELEPHONE COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>
12	369053	GARDONVILLE COOP TEL	<i>Requested certification, but not included on USAC list, so requires a letter</i>
13	369914	CONSOLDIATED TELEPHONE COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>