

September 2, 2025

Mike Bull
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. P999/PR-25-8

Dear Mr. Bull:

Attached are the comments of the Minnesota Department of Commerce (Department or Commerce) in response to the Minnesota Public Utilities Commission's (Commission) May 23, 2025 Notice of Comment Period in the following matter:

Annual Certifications Related to Eligible Telecommunications Carriers' (ETCs) Use of Federal Universal Service Support.

The Department's recommendations are included in the attached comments and the Department is available to answer questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

DD/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. P999/PR-25-8

I. INTRODUCTION

Each year, the Minnesota Public Utilities Commission (Minnesota Commission or Commission) must certify that Eligible Telecommunications Carriers (ETCs) receiving high-cost funds are using the funds received in the preceding calendar year and in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.¹

In 2024, the Federal Communications Commission (FCC) authorized, and the Universal Service Administrative Company (USAC) distributed, \$164,771,105 to Minnesota ETCs under Commission oversight to mitigate high costs in the provision of voice and broadband services. Under several of the high-cost programs, companies must build out broadband networks to a set number of locations in designated census blocks.² Each year, through the required filing of FCC Form 481, companies receiving high-cost funds³ report certain 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.⁴

The Tables attached to these comments list the categories of carriers that are subject to the annual certification process:

- Table 1 lists Minnesota companies receiving high-cost funds that the Commission should certify.
- Table 2 lists high-cost companies likely to be certified in another state, that serve some Minnesota customers that the Commission may wish to certify, to ensure the company is certified.
- Table 3 lists high-cost companies that the Commission should not certify.
- Table 4 lists high-cost companies that do not require certification but filed information and request that the Commission certify it.

¹ 47 CFR § 54.314 (a)

² Several of the funds pay out over a period of years and require that the carrier provision service to a percentage of the eligible locations for each of the years that the fund pays out.

³ Companies certified as ETCs providing Lifeline-only are required to file abbreviated versions of FCC Form 481, however, state commissions do not annually certify these Lifeline-only providers.

⁴ Minnesota Public Utilities Commission, *Order certifying Eligible Telecommunications Carriers' use of Federal High-Cost Subsidy and Requiring Comment Period in the Matter of Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of the Federal Universal Service Support Required Pursuant to 47 CFR § 54.313*, (October 24, 2018), Docket No. P999/PR-18-8, eDockets ([201810-147276-01](#)) wherein the Minnesota Public Utilities Commission required that, in future filings, an officer of each company subject to state certification file an affidavit with the Commission concurrently with the FCC Form 481 filing. Hereafter referred to as "18-8 Order."

- Table 5 lists companies whose Study Area Codes (SACs) are no longer in use and no Form 481 was filed but remain on the USAC list. Table 5 is blank, but the heading is retained to match last year's Order in Docket 23-8.
- Table 6 lists carriers who are not high-cost ETCs, 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.

II. PROCEDURAL BACKGROUND

May 23, 2025	The Public Utilities Commission (Commission) posted a notice of comment period for the petition. ⁵
June 18, 2025 to July 1, 2025	High-cost Telephone and telecommunications carriers who received Universal Service Funds from the Federal Communications Commission during the year 2024, filed their Form 481s and Affidavits as required by the Minnesota Public Utilities Commission (Commission).

Topic(s) open for comment:

- *Should the Commission approve the annual recertification compliance filings of Eligible Telecommunications Carriers' (ETCs) status for use of Federal Universal Service Fund (USF) support required pursuant to 47 C.F.R. § 54.313?*

III. RELEVANT HISTORICAL BACKGROUND

Section 254(e) of the Telecommunications Act of 1996 provides that a carrier that receives universal service support must use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. This requirement is also contained in 47 C.F.R § 54.314.

The oversight of ETCs is a joint federal-state effort. Federal support funds for Universal Service are made available through the FCC and are subject to FCC rules. However, states provide the initial designation of and subsequent certification(s) of ETCs through the Communications Act of 1934, as amended.

⁵ Minnesota Public Utilities Commission Notice of Compliance Filing Period in the Matter of the Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of Federal Universal Service Support Pursuant to 47 CFR § 54.313, (May 23, 2025), Docket No. P999/PR-25-8, eDockets ([20255-219209-01](#)).

47 U.S.C. § 214 (e) (2) states:

Designation of eligible telecommunications carriers. A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1)⁶ as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

Further, States may enact regulations in addition to the FCC's regulations. 47 U.S.C. § 254 (f) states:

A State may adopt regulations not inconsistent with the Commission's rules to preserve and advance universal service.

Thus, in 47 U.S.C. § 254 (f), Congress expressly permits States to take action to preserve and advance universal service, so long as state actions are not inconsistent with the Commission's universal service rules. States may adopt additional regulations to preserve and advance universal service.

Whether or not providers act under the auspices of a State issued Certificate of Authority or receive their ability to provide service under an ETC designation alone, state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the statute.

The FCC recognized the authority of States to enact regulations in its November 18, 2011 Order, FCC 11- 161:

⁶ Paragraph (1) states: A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the charges therefor using media of general distribution.

The statute permits states to adopt additional regulations to preserve and advance universal service so long as they also adopt state mechanisms to support those additional substantive requirements. Consistent with this federal framework, state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the statute and our implementing regulations, so long as those additional reporting requirements do not create burdens that thwart achievement of the universal service reforms set forth in this Order.⁷

In more recent Orders, the FCC again recognized the role of the States as “primarily responsible for designating ETCs.”⁸

47 C.F.R. § 54.313 outlines the annual reporting requirements for high-cost funding recipients. Among other requirements, each company or holding company shall certify:

- The carrier is able to function in emergency situations, per § 54.202(a)(2).
- The carrier’s voice service rate is no more than two standard deviations above the applicable national average urban rate for voice service (currently \$54.75).⁹
- Pricing of broadband service that meets the FCC’s public interest obligations is no more than the applicable benchmark to be announced annually.¹⁰
- The recipient’s holding company, operating companies, and affiliates’ identification, and any branding.
- To the extent the recipient serves Tribal lands, documents or information demonstrating that the ETC had discussions with Tribal governments that, at a minimum, included:
 - A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
 - Feasibility and sustainability planning;
 - Marketing in a culturally sensitive manner;

⁷ See FCC Report and Order and Further Notice of Proposed Rulemaking. FCC 11-161 released November 18, 2011, para. 574.

⁸ See FCC *Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking*. FCC 19-111 released November 14, 2019, para. 28. See also FCC Order designating 56 carriers as ETCs where the carrier is not subject to the State commission’s jurisdiction, WC Docket No 09-197 and 10-90, released June 8, 2021, para.4, explaining the limitations on when the FCC grants ETC designations.

⁹ See Public Notice, Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 Urban Rate Survey For Fixed Voice and Broadband Services, Posting Of Survey Data And Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers, DA 20-1409. Released November 30, 2021.

¹⁰ *Id.* <https://docs.fcc.gov/public/attachments/DA-20-1409A1.pdf>

- Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- Compliance with Tribal business and licensing requirements.
- The results of network performance tests pursuant to the methodology and in the format determined by the Wireline Competition Bureau.¹¹

47 C.F.R § 54.314, titled “Certification of Support for Eligible Telecommunications Carriers,” provides:

- (a) **Certification.** States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar 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 this section.

47 C.F.R § 54.405, titled “Carrier Obligations to Offer Lifeline,” provides: All eligible telecommunications carriers must:

- (a) Make available Lifeline service, as defined in § 54.401, to qualifying low-income consumers.
- (b) Publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.
- (c) Indicate on all materials describing the service, using easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. For the purposes of this section, the term “materials describing the service” includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms.
- (d) Disclose the name of the eligible telecommunications carrier on all materials describing the service.

¹¹ The FCC delayed this requirement, until 2022, see Section V.

A. *APPLICABLE ORDERS AND NOTICES OF THE FEDERAL COMMUNICATIONS COMMISSION AND MINNESOTA PUBLIC UTILITIES COMMISSION*

On November 18, 2011, the FCC released its Report and Order and Further Notice of Proposed Rulemaking, *In the Matter of Connect America, et al.* in WC Dockets No. 10-90, 07-135, 03-109, and 10-208, GN Docket No. 09-51, CC Dockets 09-92 and 96-45, and WT Docket No 10-208, which comprehensively reformed universal service and intercarrier compensation mechanisms. (Connect America Fund – Intercarrier Compensation Order or CAF-ICC Order). Among other things, the CAF-ICC Order addressed annual Section 254(e) certification by states (with respect to the ETCs they have designated). The FCC extended its current reporting requirements (previously codified in 47 C.F.R.

Section 54.209) to all ETCs and codified the reporting requirements in new Section 54.313 of its rules.

On April 11, 2014, in Docket No. P999/PR-14-8, the Minnesota Commission issued an Order modifying the schedule for future annual certifications as follows:

July 1	Deadline for ETCs to file petitions and supporting documentation, including the information required by FCC Form 481.
September 1	Deadline for comments by the Department, OAG, and other interested persons.
September 8	Deadline for replies.

On July 7, 2017, for implementation in the July 1, 2018, and future 481 filings, the FCC released an Order simplifying annual reporting requirements for ETCs receiving high-cost support. These changes eliminated the following information that was being collected:

- 1) network outage information;
- 2) unfulfilled service requests;
- 3) number of complaints per 1,000 subscribers for voice and broadband services;
- 4) voice and broadband service rates; and
- 5) the requirement for ETCs to certify compliance with service quality standards.¹²

The FCC also ordered that ETCs did not have to file directly with the state commissions, but the reports are available for states to download from the USAC website.

¹² *Report and Order.* In the Matter of Connect America Fund ETC Annual Reports and Certifications. WC Docket No. 10-90, WC Docket No. 14-58. Released July 7, 2017.

On October 24, 2018, the Minnesota Commission issued its Order in Docket P999/PR-18-8¹³ requiring that, in future filings, an officer of each company subject to state certification file an affidavit with the Commission concurrently with the FCC Form 481 filing. The affidavit must include:

- 1) The position of the affiant.
- 2) That the affiant understands and is familiar with the requirements of the FCC concerning universal service funding.
- 3) That the funds are and will be used appropriately.
- 4) That the company is compliant with applicable rules on service quality and consumer protection.
- 5) That there is sufficient backup power to ensure functionality without an external power source, and the company is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergencies.

As part of the 2019 ETC certification process, the Minnesota Commission ordered: “[b]eginning in 2020, companies must electronically file with the Commission their FCC Form 481 filings under 47 C.F.R. 54.313, along with the affidavit required in Docket No. P-999/PR-18-8.” The submission of the Form 481 filings in eDockets makes them part of the record, upon which the Commission can rely for its decisions.

In its January 30, 2020 Order, the FCC established the Rural Digital Opportunity Fund (RDOF), a grant program originally intended to provide up to \$20.4 billion over a 10-year period to bring high-speed broadband networks to unserved and underserved areas.¹⁴ RDOF grants will be distributed in two phases. Phase I will target census blocks that are wholly unserved by fixed voice and broadband of at least 25 Megabits per second (Mbps) download speed and 3 Mbps upload speed. Phase II will fund unserved locations within partially served census blocks.

In its December 7, 2020 Notice, the FCC announced the results of auction 904, which pertains to RDOF. The winning bidders included 24 companies selected to receive \$408,150,745.60 to deploy high-speed broadband to 142,841 assigned locations in Minnesota.¹⁵ Winning bidders were required to submit long-form applications to the FCC with more information regarding their qualifications and their plans to use awarded support to meet RDOF obligations.¹⁶ Additionally, by June 7, 2021, a winning bidder was required to certify and provide documentation that it was an ETC in each area for which it sought support.¹⁷ If the FCC then approved the long-form application, the applicant would be authorized to begin receiving support.

¹³ 18-8 Order.

¹⁴ See *In the Matter of Rural Digital Opportunity Fund*, WC Docket No. 19-126, Report and Order, FCC 20-5, ¶ 5 (January 30, 2020) (RDOF Order).

¹⁵ See *In the Matter of Rural Digital Opportunity Fund*, WC Docket No. 19-126., Public Notice, Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, DA 20-1422, ¶¶ 17, 36 (December 7, 2020) (Winning Bidder Announcement).

¹⁶ RDOF Order, ¶¶ 86–91.

¹⁷ 47 C.F.R. §§ 54.803(a), 54.804(b)(5).

In its May 28, 2021 and June 3, 2021 Orders, the Minnesota Commission approved petitions filed by various applicants for ETC designation in certain census blocks for the purpose of receiving RDOF grants. The Commission also required additional compliance filings from ETCs. In its May 28, 2021 and June 3, 2021 Orders, the Minnesota Commission stated that the petitioning carriers were subject to the Commission's ongoing jurisdiction to oversee ETC compliance as set forth in sections 214(e)(2) and 254(f) of the Federal Communications Act of 1934 as amended, the FCC's universal service rules codified at 47 C.F.R. part 54, and the applicable FCC auction materials.

The Commission's July 20, 2021 Order Establishing Best Practices and Requiring Filings directed high-cost ETCs to follow the Commission's best practices regarding advertising of the Lifeline program in Docket No. P999/CI-20-747.¹⁸

In its November 8, 2022 Order in Docket No. P999/PR-22-8¹⁹, the Minnesota Commission directed each ETC that serves Tribal lands to file reports 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 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 Commission Order of November 8, 2022, in Docket No. P999/PR-22-8,²⁰ took the following actions: (1) CAF II and 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, (4) The Commission adopts the Best Practices Recommendations for Tribal Engagement, as shown in Attachment 1 of the Department's September 29, 2022 Report, (5) Each annual filing, beginning in 2023, must include a narrative of how the ETC comports with the Best Practices Recommendations for Tribal Engagement.

In its April 12, 2023 Order Denying Modifications to July 20, 2021 Order Establishing Best Practices in the matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs in Docket No. P999/CI-20-747,²¹ among other things, the Commission requested that the Department engage ETCs and stakeholders regarding what would be appropriate

¹⁸ Minnesota Public Utilities Commission, *Order Establishing Best Practices and Requiring Filings in the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs*. (July 20, 2021) Docket No. P999/CI-20-747. eDockets ([20217-176339-01](#)). Hereafter 20-747 Order of July 20, 2021.

¹⁹ Minnesota Public Utilities Commission, *Order Certifying Eligible Telecommunications Carriers and Setting Additional Requirements in the Matter of Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of the Federal Universal Service Support Required Pursuant to 47 CFR § 54.313*. (November 8, 2022). Docket No. P999/PR-22-8. eDockets ([202211-190496-01](#)). Hereafter 22-8 Order.

²⁰ 22-8 Order.

²¹ Minnesota Public Utilities Commission, *Order Denying Modifications to July 20, 2021 Order Establishing Best Practices in the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs*. (April 12, 2023) Docket No. P999/CI-20-747. eDockets ([20234-194720-01](#)). Hereafter 20-747 Order of April 12, 2023.

modifications to the best practices for an annual filing along with the appropriate docket and timing of an annual filing.

IV. DEPARTMENT ANALYSIS

A. OVERVIEW OF DEPARTMENT EXAMINATION

A.1. High-Cost Plans Subject to Certification.

The FCC, through USAC,²² disburses funds to companies through more than 20 different funding programs. In 2023, USAC disbursed \$164,771,105 from eight different programs in Minnesota. These funds were distributed through the following programs, ranked from most to least dollars distributed (plans with \$0 distributed in Minnesota are excluded from this list).

Plan	Abbrev.	Amount Disbursed in MN in 2024
Enhanced Alternative Connect America Model	EACAM	\$95,234,316.96
Alternative Connect America Model	ACAM	\$16,823,990.04
Alternative Connect America Model II	ACAM II	\$12,553,783.20
Intercarrier Compensation Recovery	ICC	\$17,076,672.00
Connect America Fund Broadband Loop Support	CAF BLS	\$10,573,980.00
Rural Digital Opportunity Fund	RDOF	\$8,008,902.60
Connect America Fund Phase II Auction	CAF II Auction	\$2,962,710.22
High Cost Loop	HCL	\$1,194,954.00
Rural Broadband Experiment	RBE	\$341,796.12
Total		\$164,771,105.14

USAC provides a description of each fund at <https://www.usac.org/high-cost/funds/>.

A.2. Overview of Certification Review.

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).²³ 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.

²² USAC distributes and manages all the universal service funds mandated by the FCC.

²³ See [CFR-2022-title47-vol3-part54.pdf \(govinfo.gov\)](https://www.fcc.gov/document/cfr-2022-title47-vol3-part54.pdf)

The current report addresses the following issues relating to ETC certification:

- ETC compliance with the Lifeline Best Practices established in the Commission's July 20, 2021 Order in Docket No. P999/CI-20-747. The Department will file a separate report on Lifeline Best Practices including issues relating to Lifeline outreach required of high-cost carriers by the Federal Rules.
- Some ETCs received RDOF funds during the years 2023 and request certification. Other ETCs have not yet received funding.
- Some fund recipients must now report results of performance testing; those providers shared their results with Commerce.
- Tribal engagement from ETCs has been of concern to the Commission. Over the past two years, the Department has worked with the ETCs serving Tribal lands to increase the quantity and quality of engagement efforts.
- The Tables 1-6 list the affected companies and the Department's recommendation to certify ETCs for continued receipt of high-cost funds, or to take other action.

B. LIFELINE COMPLIANCE OF HIGH-COST CARRIERS

The Federal Rules establish Lifeline outreach requirements for high-cost Universal Service Fund recipients.

In addition to the federal Lifeline outreach requirements, the Minnesota Commission's July 20, 2021 Order in Docket No. P999/CI-20-747²⁴ established the following best practices regarding advertising of the Lifeline program for high-cost ETCs and directed high-cost carriers to comply with the best practices, to the maximum extent possible:

- a. A website that meets the following criteria: information within three clicks, searchable keywords, periodic functionality checks, all plan information displayed; and continual updates;
- b. Social media accounts;
- c. Regular outreach to social service agencies;
- d. Assign one employee to act as a Lifeline Champion, or train all employees on Lifeline at larger ETCs;
- e. Community outreach through various means;
- f. Tribal outreach;
- g. Diverse and disabled population outreach;
- h. Lifeline information on all disconnection notices;
- i. Paper materials in various formats;
- j. Participate in Lifeline Awareness Week.

²⁴ 20-747 Order of July 20, 2021.

All high-cost carriers submitted compliance filings in Docket No. P999/CI-20-747 and proposed a variety of methods for complying with the Minnesota Commission's Order.

In its April 12, 2023 Order Denying Modifications to July 20, 2021 Order Establishing Best Practices in the matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs in Docket No. P999/CI-20-747,²⁵ among other things, the Commission requested that the Department engage ETCs and stakeholders regarding what would be appropriate modifications to the best practices for an annual filing along with the appropriate docket and timing of an annual filing.

The Commission's December 12, 2024 Order, in Docket No. P999/CI-24-8,²⁶ directed carriers that received high-cost funding during the year 2023 to file their Lifeline Best Practices reports, by December 31, 2025, in compliance with the Commission's Order Establishing Best Practices and Requiring Filings (July 20, 2021) in Docket No. P999/CI-20-747, *In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs*.²⁷ These carriers must file the reports electronically in Docket No. P-999/CI-20-747.

The Department recommends that the filing requirement established in the Commission's December 12, 2024 Order be updated to require that **carriers that received high-cost funding during the year 2024 be required to file their Lifeline Best Practices reports by December 31, 2025**. The Department will file comments on these Lifeline Best Practices filings, including any issues relating to the federal Lifeline outreach requirements, in separate comments in the Commission's high cost ETC annual certification docket.

C. PERFORMANCE MEASUREMENTS TESTING.

C.1. Background and History of Performance Measurements Testing.

In 2011, the FCC announced that recipients of high-cost universal service support would be required to test broadband networks and report the results to ensure compliance with speed and latency metrics.²⁸ Results, reported to USAC, would be subject to audit. The FCC implemented performance measurement (PM) testing to support the goal of bringing a similar internet experience to both rural areas and urban environments.

The USF/ICC Transformation Order established guidelines for ETCs related to the what, when, and how high-cost ETCs should test broadband networks. The FCC also provided reporting requirements and basics of compliance. In subsequent Orders, the FCC clarified and updated PM testing requirements for

²⁵ 20-747 Order of July 20, 2021.

²⁶ Minnesota Public Utilities Commission, *Order in the Matter of Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of the Federal Universal Service Support required Pursuant to CFR 54.313. (October 1, 2024) Docket No. P999/PR-24-8. eDockets ([202410-210616-01](#))*. Hereafter 24-8 Order.

²⁷ 20-747 Order of July 20, 2021.

²⁸ WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, [26 FCC Rcd 17663](#), 17705-06, para. 109 (2011) (*USF/ICC Transformation Order*).

high-cost support recipients to stay current with changes in funding sources and advances in technology, and to respond to comments from the industry.²⁹

Regardless of the USF funding program, carriers file results with the Performance Measures Module, rather than the FCC Form 481. In 2022, price cap carriers that had been awarded CAF Phase II funding were the first to report PM results. These carriers shared results with the Commission in the 2022 ETC Certification Docket.³⁰ In 2023, providers that were required to report PM results to the FCC, shared those results as requested, with the Department.³¹ As with prior years, the Department reached out to providers in 2024 to obtain the PM results and all promptly responded.

C.2. Current Requirements.

PM testing ensures that networks funded with subsidies meet minimum speed and latency requirements. Established standards aim to bring a similar experience to both rural and urban areas and to monitor companies that promise to deploy networks that will meet the established standards.³² Speed and latency standards demand that subscribers have sufficient connectivity to use real-time applications, including Voice over Internet Protocol (VoIP).³³ Testing and reporting results continue through a provider's support term, regardless of the fund, and ends when the provider no longer receives support. To meet the PM requirements established by the FCC, high-cost recipients must adhere to and report compliance with the following:

- Speed: At least 80 percent of network speed measurements must be at 80 percent of required speeds (the "80/80 Standard")³⁴
- Latency: Round trip packet travel must be at 100 milliseconds (ms) or less (the standard for high-latency carriers, such as satellite providers awarded under CAF Phase II, is 95% of packets must travel round trip at 750 ms or less).³⁵

²⁹ See WC Docket No. 10-90, Order, 33 FCC Rcd 6509 (WCB/WTB/OET 2018) [Order DA 18-710](#), released and adopted on July 6, 2018 (*Performance Measures Order*) and In the Matter of Connect America Fund, WC Docket No. 10-90, Order on Reconsideration, Adopted Oct. 25, 2019, FCC 19-104.

³⁰ See Comments of the Minnesota Department of Commerce, pp. 12-13, *Annual Certification related to ETC use of Federal Universal Service Support. (FCC Form 481, pursuant TO 47 C.F.R. 47)*, Docket P999/PR-22-8, Doc. No. [20229-189305-01](#).

³¹ Minnesota Department of Commerce, *Comments*, (August 23, 2023), Docket No. P999/PR-23-8, eDockets ([20238-198450-01](#) trade secret) and [20238-198450-02 public](#)), pages. 9-14,

³² See *USF/ICC Transformation Order and FNPRM*, para 110 stating. "...[W]e find that requiring ETCs to submit verifiable test results to USAC and the relevant state commissions will strengthen the ability of this Commission and the states to ensure that ETCs that receive universal service funding are providing at least the minimum broadband speeds, and thereby using support for its intended purpose as required by section 254(e)."

³³ Id. at para 96.

³⁴ The test consists of a single measure of download or upload speed of 10 to 15 seconds duration between the consumer testing location and a specific remote server. See *Performance Measures Order* at para 18.

³⁵ Providers may choose between three methods for testing: (1) the Measuring Broadband America (MBA) infrastructure, in which various entities manage testing for the FCC; (2) existing tools that are available from the private sector and which the FCC has approved; or (3) develop their own self-testing software.

The process of testing also requires high-cost ETCs to follow specific requirements put into place to obtain results that accurately and consistently reflect how their deployed networks serve subscribers, including³⁶ but not limited to:

- Locations tested must be from **active subscriber locations** that are randomly assigned through USAC to a remote test server located at, or reached by passing through, an FCC-designated internet exchange point (IXP).³⁷
- Carriers must perform at least one download and one upload test during each testing hour at each testing location.
- PM testing must be performed at each speed tier offered in each state where that speed tier is offered and where high-cost support funds deployment.
- Testing must occur between 6 p.m. and 12 a.m., including weekends.
- All speed tests must occur in the same week; all latency tests must occur in the same week, but speed testing and latency testing can occur in different weeks.
- If an ETC performs more than the minimum number of required tests at one location, it must report the results of all tests.
- Larger carriers test up to 50 locations while small carriers may test as few as 5 locations.

C.2.a. "Pre-testing" vs. "Testing."

Before implementing these requirements, the FCC and USAC created a "Pre-testing" period for each fund to allow ETCs the opportunity to correct testing process anomalies and make network corrections needed to comply with standards. Pre-testing involved randomly selected, active subscriber locations and results had to be certified and reported. If ETCs that didn't meet speed and latency requirements, did not lose access to support during pre-testing, they were not subject to withholding. However, if ETCs didn't report PM pre-testing results, they were subject to withholding.

RDOF fund recipients in Minnesota entered the "pre-testing" period in 2025 and Enhanced ACAM recipients will begin the "pre-testing" phase in 2026.

C.2.b. Reporting

Testing and reporting schedules are dictated by the milestone calendar associated with each high-cost fund. This year, Minnesota providers required to report PM testing results are those that accepted Alternative Connect America Cost Model (ACAM), Alternative Connect America Model II (ACAM II), Connect America Fund Broadband Loop Support (CAF BLS), Connect America Fund II Auctions (CAF II Auction) and the Rural Broadband Experiment (RBE) programs.³⁸

³⁶ There are waivers and exceptions available for some of these and other requirements when an ETC cannot accommodate. For example, very small ISPs may not have 5 subscribers in a state within each service tier.

³⁷ ETCs report what locations to which they have completed deployment and USAC's Performance Measure Module (PMM) uses the information to randomly assign locations to be tested. The testing locations are reassigned after two years of testing.

³⁸ Alaska Plan recipients also begin testing and reporting in 2023.

Schedule for Minnesota Carriers Reporting PM Results³⁹

Program	Pre-testing Start Date	Official Testing Start Date	First Official Testing Results Due	Official Testing Final Year ⁴⁰
ACAM	January 1, 2021	January 1, 2022	July 2023	2026
ACAM II	January 1, 2022	January 1, 2023	July 2024	2028
CAF BLS	January 1, 2022	January 1, 2023	July 2023	2024/2025 (for 5-year milestone)
CAF II Auction	January 1, 2022	January 1, 2023	July 2024	2029-2032 (varies by carrier)
RBE	January 1, 2021	January 1, 2022	July 2023	2024 or 2025 (varies by carrier)
RDOF ⁴¹	January 1, 2025	January 1, 2026	July 2026	2031 or 2032 (varies by carrier)
Enhanced ACAM	January 1, 2026	January 1, 2027	July 2027	2029 (varies by carrier)

C.2.c. Compliance

The FCC considers a company's ability to achieve speed and latency standards a necessary component of meeting deployment commitments. ETCs have one year to address performance shortcomings (the "pre-testing" period) before the FCC withholds support. The level of high-cost support withheld is commensurate with the level of noncompliance.⁴²

C.2.d. Results from High-Cost Carriers Serving Minnesota

Commerce identified 43 carriers in Minnesota that received funding through one or more of these USF programs and reported PM results to USAC in 2024. To protect proprietary information, staff informally asked each company to share the summary results of their reporting via confidential email. Almost all providers were 100% compliant throughout the year. In the few cases where deviations may have resulted in possible funding withheld, all were resolved within the time allowed and for the Q4 2024 reporting.

³⁹ For the complete calendar of all program testing, see <https://www.usac.org/high-cost/annual-requirements/performance-measures-testing/>.

⁴⁰ For all USF high cost programs, providers with problems meeting the PM standards have one year after the final year of testing to return to compliance; this varies by carrier.

⁴¹ While pre-testing for these providers started earlier in 2025, official results will not be required until 2026. No RDOF recipients need report until 2026.

⁴² See *Performance Measures Order*.

C.3. The Commission Should Continue Requiring High-Cost ETCs to File Annual PM Testing Results.

In the 2011 USF/ICC Transformation Order, the FCC plainly stated that ETCs shall share PM testing results with states' designating authorities:

"We will require recipients of funding to test their broadband networks for compliance with speed and latency metrics and certify to and report the results to the Universal Service Administrative Company (USAC) on an annual basis. These results will be subject to audit. In addition, as part of the federal-state partnership for universal service, we expect and encourage states to assist us in monitoring and compliance and therefore require funding recipients to send a copy of their annual broadband performance report to the relevant state or Tribal government."⁴³

Congress determined that state commissions act as efficient gatekeepers to guard against waste, fraud, and abuse of high-cost funding.⁴⁴ As such, the Commission may use all available tools to determine that ETCs use funding to meet the goal of universal service. The Commission has already determined that the best forum to receive and review PM testing results for compliance is the annual 481 filings.

In 2022, 2023, and 2024, the Commission adopted the Department's recommendations to require high-cost carriers receiving high cost funds from all USF programs to report PM testing results with future 481 filings. Reviewing PM test results helps the Commission meet its obligation to monitor use of ratepayer funds in the state. The Department recommends continuing this practice for the foreseeable future to ensure compliance.

D. TRIBAL ENGAGEMENT.

The Minnesota Commission's Order of October 21, 2021, in Docket No. P999/PR-21-8,⁴⁵ requires ETCs serving Tribal lands to file quarterly updates with the PUC, explaining their ongoing efforts of outreach and engagement with the Tribe(s) they serve. Minnesota has nine such carriers which collectively serve the 11 reservations in the State.

Quarterly updates from ETCs are the primary tools used by the Department to 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 ask questions and discuss concerns as they arise. To date, each provider has submitted quarterly reports. In general, the engagement between ETCs and

⁴³ See *USF/ICC Transformation Order and FNPRM*, para 109.

⁴⁴ See *USF/ICC Transformation Order and FNPRM*, para. 573.

⁴⁵ Minnesota Public Utilities Commission. *Order Certifying Eligible Telecommunications Carriers' Use of Federal High-Cost Subsidy in the Matter of the Annual Certification Related to Eligible Telecommunications Carriers (ETCs) Use of Federal Universal Service Support Required Pursuant to § 54.313*, (October 21, 2021) Docket No. P999/PR-21-8. eDockets ([202110-179001-01](#))

Tribes is consistent, with the majority of ETCs sending quarterly correspondence to their primary points of contact and making calls and meetings, when requested.

In its November 8, 2022 Order in Docket No. P999/PR-22-8,⁴⁶ 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 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.

E. AFFIDAVITS AND FINANCIAL STATEMENTS.

On October 24, 2018, the Minnesota Commission issued its Order in Docket P999/PR-18-8 requiring that, in future filings, an officer of each company subject to state certification file an affidavit with the Commission concurrently with the FCC Form 481 filing. Specifically, the Minnesota Commission ordered: "[b]eginning in 2020, companies must electronically file with the Commission their FCC Form 481 filings under 47 C.F.R. 54.313, along with the affidavit required in Docket No. P-999/PR-18-8."⁴⁷ According to the October 24, 2018 Order, the affidavit must include:

- a. The position of the affiant.
- b. That the affiant understands and is familiar with the requirements of the FCC concerning universal service funding.
- c. That the funds are and will be used appropriately.
- d. That the company is compliant with applicable rules on service quality and consumer protection.
- e. That there is sufficient backup power to ensure functionality without an external power source, and the company is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergencies.

The purpose in establishing the affidavit requirement was to ensure compliance with the requirements of 47 C.F.R. § 54.313, which requires high-cost carriers to submit annual 481 filings. 47 C.F.R. § 54.314 requires:

States that desire eligible telecommunications carriers to receive support pursuant to the **high-cost** program must file an annual certification with the Administrator and the Commission

⁴⁶ 22-8 Order, pages 4-5.

⁴⁷ 18-8 Order, page 3.

stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. (emphasis added).

The affidavit requirement adopted by the Commission, and recommended by the Department, was consistent with an affidavit filed by carriers represented by Olsen, Thielen, Ltd. in the current docket.

In its September 19, 2018 responsive comments in Docket No. P999/PA-18-08,⁴⁸ the Department recommended that, in addition to the affidavit, high-cost carriers be required to submit a financial summary consistent with the financial summary filed by carriers represented by Olsen, Thielen, Ltd. This financial summary includes the following information:

- f. The sources of Federal Universal Service Receipts Subject to Certification
- g. An explanation of statewide distribution vs. study area code disbursement
- h. Plant Specific Operations Expenses
- i. Customer Operations Expenses
- j. Corporate Operations Expenses
- k. Total Year Supported Expenses Before Return on Investment
- l. Additions
- m. 481 Financial Statement Summarized Information
- n. Corporate Expense to Operating Revenue Information

In its October 24, 2018 Order in Docket No. P999/PR-18-08, the Commission stated that it would “issue a notice and establish a comment period on whether a financial summary should be filed along with the financial affidavit, and on whether there is interest in establishing a stakeholder process for further discussion of such issues.”⁴⁹

The Notice of Comment, referenced in the October 24, 2018 Order was never issued. It is the Department’s understanding that, at the time when the Commission was considering releasing a Notice of Comment, Olsen, Thielen, Ltd. already included financial summaries along with its annual filings in the annual certification docket. Because the firm currently represents carriers holding a majority of the Minnesota SCs, the Commission and its staff may consider a comment period to address inclusion of financial summaries with 481 unnecessary.

The Department will review the financial summaries included with the annual filings made in the current docket and will comment on these summaries separately, to the extent that Commission action is recommended.

⁴⁸ Minnesota Department of Commerce, *Reply Comments*, (September 20, 2018). Docket No. P999/PR-18-8. eDockets ([20189-146527-01](#))

⁴⁹ 18-8 Order, page 3.

V. DEPARTMENT RECOMMENDATIONS

A. TABLES ATTACHED TO DEPARTMENT COMMENTS

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

Table 1 lists the Minnesota high-cost ETCs that the Commission should certify, consistent with the Department's recommendation in the current docket.

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.⁵⁰ 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 SACs, are no longer operational, but whose SACs are still listed in certain USAC spreadsheets. 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.

B. RECOMMENDATIONS

The Department recommends that the Commission take the following actions:

1. Certify the ETCs listed in Table 1.
2. Certify the ETCs listed in Table 2.
3. Certify the ETC listed in Table 4 by including the SACs in a letter to the FCC.
4. Take no action on the ETC provision of Lifeline Services, as those issues are to be addressed in separate comments.

⁵⁰ 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.

5. Require all high-cost ETCs to share results of performance measures testing with the Commission in the Annual Certification Docket.
6. Take no action on the quarterly reports on Tribal engagement efforts for those ETCs serving Tribal lands.
7. 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. Require carriers that were recipients of high-cost funding during the year 2024 to submit their Lifeline Best Practices compliance filings, in compliance with the Commission's July 20, 2021 Order in Docket No. P999/CI-20-747, by **December 31, 2025**. These compliance filings should be efiled in Docket No. P999/CI-20-747.

**2024 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Attachment A

**2024 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

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

The ETCs listed below are included on Minnesota's federal Universal Service High-Cost Program (High-Cost Program) certification list and should be certified by the 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

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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	369047	LTD BROADBAND LLC	MN	CETC	y
46	361410	JOHNSON TEL CO	MN	ILEC	y
47	361412	KASSON & MANTORVILLE	MN	ILEC	y
48	361419	LISMORE COOP TEL CO	MN	ILEC	y
49	361422	LONSDALE TEL CO	MN	ILEC	y
50	361443	LORETEL SYSTEMS INC	MN	ILEC	y
51	361424	MABEL COOP TEL - MN	MN	ILEC	y
52	361426	MANCHESTER-HARTLAND	MN	ILEC	y
53	361427	MANKATO-HICKORYTECH	MN	ILEC	y
54	361430	MELROSE TEL CO	MN	ILEC	y
55	361375	MID-COMM-HICKORYTECH	MN	ILEC	y
56	369015	MIDCONTINENT COMMUNICATIONS	MN	CETC	y
57	361413	MID STATE DBA KMP	MN	ILEC	y
58	361433	MID STATE TEL CO	MN	ILEC	y
59	361431	MIDWEST TEL CO	MN	ILEC	y
60	361439	MINNESOTA VALLEY TEL	MN	ILEC	y
61	361442	NEW ULM TELECOM, INC	MN	ILEC	y
61	361500	NORTHERN TEL CO - MN	MN	ILEC	y

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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

**2024 Eligible Telecommunications Carriers for Certification
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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

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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

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Table 3 ETCs that the Commission Should Not Certify					
No.	SAC	Carrier Name	Certifying State	Carrier Type	Certification (YIN)

**2024 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>
8	369050	GARDEN VALLEY TELEPHONE COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>
9	369053	GARDONVILLE COOPERATIVE TELEPHONE ASSOCIATION	<i>Requested certification, but not included on USAC list, so requires a letter</i>
10	369049	PAUL BUNYAN TELEPHONE COOPERATIVE	<i>Requested certification, but not included on USAC list, so requires a letter</i>
11	369021	FEDERATED TELEPHONE COOPERATIVE	<i>Requested certification, but not included on USAC list, so requires a letter</i>
12	369030	AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>
13	369049	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	<i>Requested certification, but not included on USAC list, so requires a letter</i>
14	369050	GARDEN VALLEY TELEPHONE COMPANY	<i>Requested certification, but not included on USAC list, so requires a letter</i>
15	369053	GARDONVILLE COOP TEL	<i>Requested certification, but not included on USAC list, so requires a letter</i>
16	369914	CONSOLIDATED TELEPHONE COMPANY	<i>Requested certification, but not included on</i>

**2024 Eligible Telecommunications Carriers for Certification
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			<i>USAC list, so requires a letter</i>
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Table 5 Carriers on USAC high-cost list, who are no longer operational and whose SACs no longer exist. The Minnesota PUC should write to FCC requesting that these carriers be removed from USAC's list of high-cost carriers.				
No.	SAC	Carrier Name	Certifying State	Certification (YIN)

Table 6A Wireless ETCs that do not receive high-cost support and do not require certification				
No.	SAC	Carrier Name	Certifying State	Certification (YIN)
1	369016	TELRITE CORPORATION DBA LIFE WIRELESS	<i>MN</i>	<i>N/A</i>
2	369032	TRACFONE WIRELESS, LLC	<i>MN</i>	<i>N²</i>
3	369025	BOOMERANG WIRELESS	<i>MN</i>	<i>N/A</i>
4	369033	TEMPO TELECOM, LLC	<i>MN</i>	<i>N/A</i>
5	369018	ASSURANCE WIRELESS USA LP	<i>MN</i>	<i>N/A</i>
6	369058	DISH WIRELESS LLC	<i>MN</i>	<i>N/A</i>
7	369017	TERRACOM, INC	<i>MN</i>	<i>N/A</i>
8	369023	I-WIRELESS, LLC	<i>MN</i>	<i>N/A</i>
9	369057	Air Voice Wireless, LLC	<i>MN</i>	<i>N/A</i>
10	369022	GLOBSL CONNECTION OF AMERICA	<i>MN</i>	<i>N/A</i>
11	369030	AMERICAN BRODBAND AND TELECOMMUNICATIONS CO	<i>MN</i>	<i>N/A</i>
12	369060	IM TELECOM LLC	<i>MN</i>	<i>N/A</i>
13	369034	SAGE TELECOM COMMUNICATIONS LLC	<i>MN</i>	<i>N/A</i>
14	369059	TRUCONNECT COMMUNICATIONS INC.	<i>MN</i>	<i>N/A</i>
Table 6B Wireline ETC SACs that do not receive high-cost support and do not require certification				
No.	SAC	Carrier Name	Certifying State	Certification (YIN)

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. P999/PR-25-8

Dated this **2nd** day of **September 2025**

/s/Nicole Westling

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Issa	Asad	reg@qlinkwireless.com	Q Link Wireless LLC		499 E Sheridan St Ste 400 Dania Beach FL, 33004 United States	Electronic Service		No	P999/PR-25-8
2	Tracy	Bandemer	tracy.bandemer@itccoop.com	Interstate Telecommunications Cooperative, Inc.		312 4th St W PO Box 920 Clear Lake SD, 57226 United States	Electronic Service		No	P999/PR-25-8
3	Dianne	Barthel	dianne.barthel@centurylink.com	Qwest Communications Company, LLC.		200 S 5th St Rm 2200 Minneapolis MN, 55402 United States	Electronic Service		No	P999/PR-25-8
4	James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.		123 W 7th Street Blue Earth MN, 56013 United States	Electronic Service		No	P999/PR-25-8
5	Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company		301 2nd St S Bellingham MN, 56221 United States	Electronic Service		No	P999/PR-25-8
6	Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company		301 2nd St S Bellingham MN, 56212-1000 United States	Electronic Service		No	P999/PR-25-8
7	Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative		405 2nd Street East PO Box 156 Chokio MN, 56221 United States	Electronic Service		No	P999/PR-25-8
8	David	Bickett	dave.bickett@parkregion.com	Otter Tail Telcom		PO Box 277 100 Main St Underwood MN, 56586 United States	Electronic Service		No	P999/PR-25-8
9	Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company (old)		150 2nd Ave SW Perham MN, 56573 United States	Electronic Service		No	P999/PR-25-8
10	Karl	Blake	kblake@polartel.com	Polar Communications Mutual Aid Corp.		PO Box 270 110 Fourth Street East Park River ND, 58270 United States	Electronic Service		No	P999/PR-25-8
11	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	P999/PR-25-8
12	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	P999/PR-25-8
13	Chad	Bullock	chadb@wcta.net	West Central Telephone Association		308 Frontage Road PO Box 304 Sebeka MN, 56477 United States	Electronic Service		No	P999/PR-25-8

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Thomas	Burns	tgburns@otcpas.com	OLSEN THIELEN & CO. LTD		2675 Long Lake Rd Saint Paul MN, 55113 United States	Electronic Service		No	P999/PR-25-8
15	Danny	Busche	dannybusche@live.com	Winthrop Telephone Company		318 2nd Ave E PO Box 310 Franklin MN, 55333-0310 United States	Electronic Service		No	P999/PR-25-8
16	Thomas	Campbell	tcampbell@otcpas.com	Olsen Thielen		2675 Long Lake Road St. Paul MN, 55309 United States	Electronic Service		No	P999/PR-25-8
17	James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.		P.O. Box 920 312 Fourth Street Clear Lake SD, 57226 United States	Electronic Service		No	P999/PR-25-8
18	Andrew	Carlson	acarlson@taftlaw.com	Taft Stettinius & Hollister LLP		Suite 2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	P999/PR-25-8
19	DANYELL	CARROLL	danyell.carroll@windstream.com	Talk America, LLC		4001 N Rodney Parham Rd Little Rock AR, 72212 United States	Electronic Service		No	P999/PR-25-8
20	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	P999/PR-25-8
21	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	P999/PR-25-8
22	Angie	Dickison	angie.dickison@tdstelecom.com	TDS Telecom LLC			Electronic Service		No	P999/PR-25-8
23	Donna	Eul	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company		301 2nd St S Bellingham MN, 56212 United States	Electronic Service		No	P999/PR-25-8
24	Trent	Fellers	trent.fellers@windstream.com	Windstream		1440 M St Lincoln NE, 68508 United States	Electronic Service		No	P999/PR-25-8
25	Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI		2631 Morse Rd Columbus OH, 43231-5931 United States	Electronic Service		No	P999/PR-25-8
26	Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.		P.O. Box 349 612 East 3rd Garretson SD, 57030 United States	Electronic Service		No	P999/PR-25-8
27	Travis	Floyd	travisf@wcta.net	West Central Telephone Association		308 Frontage Rd PO Box 304 Sebeka MN,	Electronic Service		No	P999/PR-25-8

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56477 United States				
28	Mark	Forseth	markforseth@rrv.net	Halstad Telephone Company		Box 55 345 2nd Ave West Halstad MN, 56548 United States	Electronic Service		No	P999/ PR-25-8
29	Julie	Geerdes	jgeerdes@paulbunyan.net	Paul Bunyan Rural Telephone Coop		1831 Anne St. NW Bemidji MN, 56601 United States	Electronic Service		No	P999/ PR-25-8
30	Mackenzie	Gilbertson	mackenzie.gilbertson@aciracoop.net	Federated Telephone		405 2nd Street East PO Box 156 Chokio MN, 56221 United States	Electronic Service		No	P999/ PR-25-8
31	Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Association		PO Box 304 308 Frontage Rd Sebeka MN, 56477 United States	Electronic Service		No	P999/ PR-25-8
32	William	Haas	william.haas@t-mobile.com	T-Mobile USA, Inc. (PARTY)		P.O. Box 10076 Cedar Rapids IA, 52410 United States	Electronic Service		No	P999/ PR-25-8
33	Roxi	Hacker	roxih@interstatetelcom.com	Interstate Telcom Consulting, Inc		130 Birch Ave Hector MN, 55342 United States	Electronic Service		No	P999/ PR-25-8
34	Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.		1104 19th Ave SW Ste B Willmar MN, 56201 United States	Electronic Service		No	P999/ PR-25-8
35	Corey	Hauer	coreyhauer@gmail.com	LTD Broadband LLC		69 Teahouse St Las Vegas NV, 89138 United States	Electronic Service		No	P999/ PR-25-8
36	Donna	Heaston	donna.heaston@allstream.com	Electric Lightwave, LLC (New)		dba Allstream 2800 Campus Dr Ste 140 Plymouth MN, 55441 United States	Electronic Service		No	P999/ PR-25-8
37	Kent	Hedstrom	kent@runestone.net	Runestone Telephone Association		PO Box 336 100 Runestone Dr Hoffman MN, 56339-0336 United States	Electronic Service		No	P999/ PR-25-8
38	Bruce	Hegge	manager@springgrove.coop	Spring Grove Communications		PO Box 516 166 W Main St Spring Grove MN, 55974 United States	Electronic Service		No	P999/ PR-25-8
39	Sarah	Hendel	info@lismoretele.com	Lismore Cooperative Telephone Company		230 S. 3rd AvePO Box 127 Lismore MN, 56155 United States	Electronic Service		No	P999/ PR-25-8

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
40	Cory	Hoerler	choerler@mhtele.com	Manchester Heartland		204 Railroad St Manchester MN, 56007-5012 United States	Electronic Service		No	P999/ PR-25-8
41	Conrad	Johnson	jtcconrad@jtc-co.net	Johnson Telephone Company		205 1st Ave NE PO Box 39 Remer MN, 56672-0039 United States	Electronic Service		No	P999/ PR-25-8
42	Dwayne	Johnson	jtcbusiness@jtc-co.net	Johnson Telephone Company		205 1st Ave NE PO Box 39 Remer MN, 56672-0039 United States	Electronic Service		No	P999/ PR-25-8
43	Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.		P.O. Box 1596 1831 Anne Street NW Bemidji MN, 56601 United States	Electronic Service		No	P999/ PR-25-8
44	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	P999/ PR-25-8
45	Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association		131 6th St Albany MN, 56307-8322 United States	Electronic Service		No	P999/ PR-25-8
46	Carrie	Kern Taggart	cak@wiktel.com	Wikstrom Telephone Company Inc		212 South Main PO Box 217 Karlstad MN, 56732 United States	Electronic Service		No	P999/ PR-25-8
47	Randy	Kiesel	randy.kiesel@metronetinc.com	Metro Fibernet, LLC		3701 Communications Way Evansville IN, 47715 United States	Electronic Service		No	P999/ PR-25-8
48	Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company		337 Aetna St Ruthon MN, 56170 United States	Electronic Service		No	P999/ PR-25-8
49	Pat	Knutson	pat.knutson@aciracoop.net	Farmers Mutual Telephone Company		PO Box 156 Chokio MN, 56221 United States	Electronic Service		No	P999/ PR-25-8
50	Patricia	Knutson	in.another.account.pat.knutson@aciracoop.net	Federated Telephone Cooperative		405 2nd Street East PO Box 156 Chokio MN, 56221 United States	Paper Service		No	P999/ PR-25-8
51	Julie	Kolka	juliekolka@mabeltel.coop	Harmony Telephone Company, LLC		PO Box 368 214 N Main St Mabel MN, 55954-0368 United States	Electronic Service		No	P999/ PR-25-8
52	John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.		704 E. Main Street Lake Mills IA, 50450 United States	Electronic Service		No	P999/ PR-25-8

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom		27 North Minnesota P.O. Box 697 New Ulm MN, 56073 United States	Electronic Service		No	P999/ PR-25-8
54	Al	Lundeen	alundeen@wiktel.com	Wikstrom Telephone Company		212 S Main St Karlstad MN, 56732-0217 United States	Electronic Service		No	P999/ PR-25-8
55	Monty	Morrow	montymorrow@nuvera.net	Nuvera Communications, Inc.		235 Franklin St Hutchinson MN, 55350 United States	Electronic Service		No	P999/ PR-25-8
56	Steve	Mueller	steve.mueller@gvtel.net	Garden Valley Telephone Company d/b/a Garden Valley Technologies		201 Ross Ave Erskine MN, 56535 United States	Electronic Service		No	P999/ PR-25-8
57	Melanie	Nelson	phinkley@rrv.net	Halstad Telephone Company		345 2nd Ave W PO Box 55 Halstad MN, 56548 United States	Electronic Service		No	P999/ PR-25-8
58	Josh	Netland	jnetland@emily.net	Emily Cooperative Telephone Company		PO Box 100 40040 State Hwy 6 Emily MN, 56447-0100 United States	Electronic Service		No	P999/ PR-25-8
59	Chris	Olson	wcphone@wcta.net	West Central Telephone Assoc.		P.O. Box 304 308 Frontage Road Sebeka MN, 56477 United States	Electronic Service		No	P999/ PR-25-8
60	Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association		506 Broadway PO Box 136 Abercrombie ND, 58001-0136 United States	Electronic Service		No	P999/ PR-25-8
61	Paul	Paco Erickson	paco_erickson@mmi.net			3901 N Louise Ave Sioux Falls SD, 57107 United States	Electronic Service		No	P999/ PR-25-8
62	Michelle	Painter	michelle.painter@sprint.com	Assurance Wireless USA, L. P.		12502 Sunrise Valley Dr Reston VA, 20196 United States	Electronic Service		No	P999/ PR-25-8
63	Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.		14450 Burnhaven Drive Burnsville MN, 55306 United States	Electronic Service		No	P999/ PR-25-8
64	Brian	Rathman	brian.rathman@telrite.com	Telrite Corporation		2300 Windy Ridge Pkwy Ste 350S Atlanta GA, 30339 United States	Electronic Service		No	P999/ PR-25-8

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65	Julia	Redman Carter	julia.redmancarter@viaoneservices.com	Boomerang Wireless LLC		2711 Lyndon B. Johnson Fwy Ste. 1065 Dallas TX, 75234 United States	Electronic Service		No	P999/PR-25-8
66	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	P999/PR-25-8
67	Tym	Rutkowski	tym.rutkowski@mossadams.com	Moss Adams		Eagan MN, null United States	Electronic Service		No	P999/PR-25-8
68	Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company		2220 125th St NW Rice MN, 56367 United States	Electronic Service		No	P999/PR-25-8
69	David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.		150 2nd St SW Perham MN, 56573 United States	Electronic Service		No	P999/PR-25-8
70	Julie	Serbus	jserbus@mnval.net	Minnesota Valley Telephone Company		PO Box 310 340 2nd Ave E Franklin MN, 55333 United States	Electronic Service		No	P999/PR-25-8
71	Ryan	Severson	rseverson@roseauelectric.com	Roseau Electric Cooperative Inc.		1107 3rd St NE PO Box 100 Roseau MN, 56751-1326 United States	Electronic Service		No	P999/PR-25-8
72	Samantha	Simatos	samantha.simatos@mossadams.com			601 W Riverside Avenue Spokane WA, 99201 United States	Electronic Service		No	P999/PR-25-8
73	Greg	Springer	greg@goc tc.com	Consolidated Telephone Company		PO Box 972 1102 Madison St Brainerd MN, 56401 United States	Electronic Service		No	P999/PR-25-8
74	Kimberly	Starr	kim@dunnelltelephone.com	Dunnell Telephone Company		PO Box 728 Judson TX, 75660 United States	Electronic Service		No	P999/PR-25-8
75	Tracey	Stoll	tstoll@roseauelectric.com	Roseau Electric Cooperative, Inc.		1107 3rd St NE PO Box 100 Roseau MN, 56751-1326 United States	Electronic Service		No	P999/PR-25-8
76	Cynthia	Sweet	csweet@acentek.net	Ace Telephone Association		PO Box 360 207 East Cedar Houston MN, 55943-0360 United States	Electronic Service		No	P999/PR-25-8
77	Guy	Swenson	tecmanager@barnesvillemn.com	Barnesville Municipal Telephone Company		PO Box 550 101 Front St S Barnesville MN, 56514 United States	Electronic Service		No	P999/PR-25-8
78	Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.		704 E Main St Lake Mills IA, 50450 United States	Electronic Service		No	P999/PR-25-8

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79	Amy	Thompson	sflanders@polartel.com	Polar Communications		PO Box 270 Park River ND, 58270 United States	Electronic Service		No	P999/ PR-25-8
80	Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville		18 2nd Avenue NW Kasson MN, 55944 United States	Electronic Service		No	P999/ PR-25-8
81	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	P999/ PR-25-8
82	Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone		PO Box 277 Upsala MN, 56384 United States	Electronic Service		No	P999/ PR-25-8
83	Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone		1831 Anne St NW Bemidji MN, 56601 United States	Electronic Service		No	P999/ PR-25-8
84	Kalsie	Vanasse	kalsiev@paulbunyan.net	Paul Bunyan Rural Telephone Coop		1831 Anne Street NW Bemidji MN, 56601 United States	Electronic Service		No	P999/ PR-25-8
85	Amy	Vick	amy.vick@itccoop.com	Interstate Telecommunications Coop., Inc.		312 4th St. W. PO Box 920 Clear Lake SD, 57226 United States	Electronic Service		No	P999/ PR-25-8
86	Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications		3901 N Louise Ave Sioux Falls SD, 57107 United States	Electronic Service		No	P999/ PR-25-8
87	Lyle	Waughtal	lyle.waughtal@gvtel.net	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	P999/ PR-25-8
88	Mark	Wegscheid	markw@broadband-mn.com	Broadband Corp.		1772 Steiger Lake Ln Victoria MN, 55386 United States	Electronic Service		No	P999/ PR-25-8
89	Kristi	Westbrock	kristi@goc tc.com	Consolidated Telephone Company		1102 Madison St PO Box 972 Brainerd MN, 56401-0972 United States	Electronic Service		No	P999/ PR-25-8
90	Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company		PO Box 217 212 South Main St Karlstad MN, 56732-0217 United States	Electronic Service		No	P999/ PR-25-8
91	Anthony	Will	anthonyw@broadband-mn.com	Broadband Corp		585 Hwy 7 W Hutchinson MN, 55350 United States	Electronic Service		No	P999/ PR-25-8

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92	David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association		800 Central Ave N Brandon MN, 56315 United States	Electronic Service		No	P999/ PR-25-8
93	Shane	Young	office@northern.tel	Northern Telephone Company		13448 County Road 25 Wawina MN, 55736 United States	Electronic Service		No	P999/ PR-25-8