

September 13, 2017

Dan Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 500
St. Paul, MN 55101-2147

Re. Melrose Telephone Company, Docket No. P-415/AM-17-65

Dear Mr. Wolf,


Melrose Telephone Company (“Melrose”) is submitting these Comments in response to the Commission’s August 20, 2017 Notice of Comment Period in this docket. Melrose requests that the Commission choose “Alternative 1, Take no action” in this docket.

Melrose believes that the Commission’s decision in this docket should focus on the fact that all of Melrose’s statements regarding the increase to the increase in the FCC’s minimum rate floor were completely accurate when made, and that the FCC did not reverse its position until after Melrose had implemented the rate increase. As a result, Melrose’s position is not like other small telephone companies that learned of the FCC’s change in position before the rates were increased and were, as a result, not in a position of possibly reversing rates that had already been implemented. Melrose does not agree with the Department’s position that its recommendation would be a reasonable interpretation of Minnesota Statute Section 237.773, which does not address the after-the-fact change in underlying facts (the FCC’s position) that is present in this case.

Melrose also believes that a very high level of customer confusion is inevitable if the Department’s recommendation is adopted, and that steps that will lead to such customer confusion should not be required unless needed to correct misstatements (not present in this case), and in the absence of clear direction from Minnesota Statutes (direction that is also not present in this case).

Sincerely,

MELROSE TELEPHONE COMPANY


By Mark Birkholz
Director of Southern Markets