

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

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Chair  
Vice-Chair  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Annual Certifications  
Related to Eligible Telecommunications  
Carriers' (ETC) Use of Federal Universal  
Service Support

DOCKET NO. P-999/PR-22-8

**COMMENTS OF THE OFFICE  
OF THE ATTORNEY GENERAL**

**INTRODUCTION**

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments providing certification recommendations to the Minnesota Public Utilities Commission (“Commission”) for those Minnesota eligible telecommunications carriers (“ETCs”) that receive, have received, or will receive, federal Universal Service High Cost Program (“High Cost Program” or “High Cost”) funding.<sup>1</sup> While the OAG makes some general recommendations for Minnesota’s High Cost Program ETCs based on the High Cost Program rules, the federal Universal Service Lifeline Program (“Lifeline Program” or “Lifeline”) rules, and the Lifeline best practices order issued by the Commission on July 20, 2021, the OAG identified no rule violations that would warrant a denial of High Cost ETC certification for any filer at this time.<sup>2</sup> Accordingly, the OAG recommends certification for all of the Minnesota High Cost Program ETCs that require certification.

**BACKGROUND**

**I. STATE ETC DESIGNATION, CERTIFICATION, AND SCHEDULE**

**A. ETC DESIGNATION**

The Telecommunications Act of 1996 requires a telecommunications carrier to receive an ETC designation to be eligible to receive funding from the High Cost Program and the Lifeline Program.<sup>3</sup> Currently, the services supported by the federal Universal Service programs are voice

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<sup>1</sup> ETCs that receive only federal Universal Service Lifeline Program funding file truncated versions of the FCC Form 481 and do not require annual certification by the state.

<sup>2</sup> Note that the OAG had limited time to analyze the more than 100 FCC Forms 481 filed by Minnesota High Cost Program ETCs. If the OAG later determines that a Minnesota High Cost Program ETC has violated program rules in a manner that warrants enhanced compliance obligations or a revocation of ETC status, the OAG will submit a filing in this or another Commission docket to provide recommendations about how to address the non-compliance.

<sup>3</sup> [47 U.S.C. § 214\(e\)\(1\)](#).

telephony services and broadband Internet access services (“BIAS”).<sup>4</sup> With limited exceptions,<sup>5</sup> state commissions are responsible for the designation of ETCs.<sup>6</sup>

## B. ETC CERTIFICATION

Each year, an ETC must file all of the information and certifications required by the federal Universal Service rules with the Universal Service Administrative Company (“USAC”).<sup>7</sup> In furtherance of this requirement, the Federal Communications Commission (“FCC”) has created the Form 481, a detailed and comprehensive form that all ETCs must file by July 1.<sup>8</sup> Although the FCC no longer requires High Cost Program ETCs to file copies of their FCC Forms 481 with the states,<sup>9</sup> the Commission issued an order in 2019 mandating that Minnesota High Cost Program ETCs electronically file their FCC Forms 481 with the state.<sup>10</sup>

States play a critical role in ETC certification. As recognized by the FCC, “[t]he billions of dollars that the Universal Service Fund disburses each year to support vital communications services comes from American consumers and businesses, and recipients must be held accountable for how they spend that money.”<sup>11</sup> Accordingly, a state may adopt those ETC regulations and requirements it sees fit to preserve and advance federal Universal Service so long as those regulations and requirements are not inconsistent with the FCC’s rules.<sup>12</sup> In fact, the FCC’s ETC reporting and certification requirements reflect a “floor rather than a ceiling” for states and “state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the [federal Universal Service] statute and [the] implementing regulations. . . .”<sup>13</sup>

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<sup>4</sup> 47 C.F.R. § 54.101(a).

<sup>5</sup> See 47 U.S.C. § 214(e)(6) (discussing designation for ETCs not subject to state commission jurisdiction).

<sup>6</sup> 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(b).

<sup>7</sup> USAC Website, Annual Requirements, <https://www.usac.org/high-cost/annual-requirements/> (High Cost) and <https://www.usac.org/lifeline/rules-and-requirements/forms/annual-filings/> (Lifeline) (both sites last visited on Sept. 22, 2022). USAC is the designated permanent administrator of the federal Universal Service support mechanisms. See 47 C.F.R. § 54.701(a).

<sup>8</sup> 47 C.F.R. § 54.313(j); see also Instructions to FCC Form 481 at 4, <https://www.usac.org/wp-content/uploads/high-cost/documents/Forms/FCC-Form-481-Instructions.pdf> (last visited Sept. 22, 2021).

<sup>9</sup> *In the Matter of Connect America Fund ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Report and Order, [FCC 17-87](#), para. 15 (2017) (eliminating the federal requirement that High Cost Program ETCs provide copies of their FCC Forms 481 to states) but see 47 C.F.R. § 54.422(c) (retaining the federal requirement that Lifeline Program ETCs file copies of their FCC Forms 481 with the states).

<sup>10</sup> *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*, Docket No. P-999/PR-19-8, ORDER CERTIFYING ELIGIBLE TELECOMMUNICATIONS CARRIERS’ USE OF FEDERAL HIGH-COST SUBSIDY at 3-4 (Oct. 17, 2019) (“2019 ETC Order”).

<sup>11</sup> *In the Matter of Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, [FCC 11-161](#), para. 568 (2011) (“2011 CAF Order”).

<sup>12</sup> See 47 U.S.C. § 254(f) (“A State may adopt regulations not inconsistent with the [FCC]’s rules to preserve and advance universal service.”).

<sup>13</sup> [2011 CAF Order](#), para. 574 (discussing state ETC authority). See also *id.*, para. 573 (establishing an oversight partnership between the FCC and the states).

### C. ETC CERTIFICATION SCHEDULE

In prior years, the Commission has established the following schedule for annual ETC certification:

July 1	Deadline for ETCs to file petitions and supporting documentation, including the information required by the FCC Form 481. <sup>14</sup>
September 1	Deadline for the OAG, the Minnesota Department of Commerce (“Department”), and other interested persons to file comments.
September 8	Deadline for reply comments.

This year, however, the schedule has been modified to account for a federal delay in approving changes to the FCC Form 481.<sup>15</sup> For the current year, the Commission has established the following schedule for annual ETC certification:

July 29	Deadline for ETCs to file petitions and supporting documentation, including the information required by the FCC Form 481. <sup>16</sup>
September 26	Deadline for the OAG, Department, and other interested persons to file comments. <sup>17</sup>
October 3	Deadline for reply comments. <sup>18</sup>

In order for Minnesota High Cost Program ETCs to be eligible for support, the Commission typically must file an annual certification with the FCC and USAC by October 1 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.<sup>19</sup> This year, the FCC has extended the Commission’s certification

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<sup>14</sup> *In the Matter of Annual Certifications Related to Eligible Telecommunications Carriers’ Use of Federal Universal Service Support*, Docket No. P-999/PR-14-8, ORDER at 1 (Apr. 11, 2014).

<sup>15</sup> See generally Wireline Competition Bureau Extends Deadline for Annual High-Cost Use Certification to October 31, 2022, WC Docket No. 10-90, Public Notice, [DA 22-928](#) (Sept. 6, 2022); *In the Matter of Annual Certifications Related to Eligible Telecommunications Carriers’ (ETCs) Use of Federal Universal Service Support*, Docket No. P-999/PR-22-8, ORDER at 1 (Sept. 21, 2022) (“*Commission Extension Order*”); USAC Website, File FCC Form 481, <https://www.usac.org/high-cost/annual-requirements/file-fcc-form-481/> (last visited Sept. 22, 2022).

<sup>16</sup> *In the Matter of the Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of Federal Universal Service Support Required Pursuant to 47 C.F.R. § 54.313*, Docket No. P-999/PR-22-8, Notice of Compliance Filing Period at 1 (July 14, 2022).

<sup>17</sup> *Commission Extension Order* at 1.

<sup>18</sup> *Id.*

<sup>19</sup> [47 C.F.R. § 54.314\(a\)](#).

deadline to October 31, 2022.<sup>20</sup> If the Commission submits its annual certification after October 31, 2022, the Minnesota High Cost Program ETCs may incur funding reductions.<sup>21</sup>

A list of the High Cost Program ETCs requiring Commission certification by October 31, 2022 is provided in Table 1 of Attachment A. Also included in Attachment A are:

Table 2	A list of the High Cost ETCs who are likely to be certified by other states but could also be certified by the Commission;
Table 3	A list of ETCs the Commission should not certify;
Table 4	A list of the High Cost ETCs who do not require certification but who filed FCC Forms 481 with the Commission and have asked the Commission to certify them.
Table 5	A list of the High Cost ETCs who did not file an FCC Form 481 and whose Service Area Codes (“SAC”) are inactive, but who still appear on the Minnesota High Cost annual certification list. The OAG recommends that the Commission write to the FCC and USAC to request the removal of these ETCs from the Minnesota High Cost annual certification list.
Table 6A	A list of wireless Lifeline-only ETCs that are required by the Lifeline Program rules to file their FCC Forms 481 with the Commission but do not require Commission certification to continue receiving Lifeline Program funding.
Table 6B	A list of wireline Lifeline-only ETCs that are required by the Lifeline Program rules to file their FCC Forms 481 with the Commission but do not require Commission certification to continue receiving Lifeline Program funding.

## **II. HIGH COST PROGRAM CERTIFICATION REQUIREMENTS AND ISSUES**

### **A. HIGH COST PROGRAM FUNDING SUMMARY**

In 2021, USAC disbursed approximately \$247,614,218 to Minnesota-designated High Cost Program ETCs from nine (9) different High Cost Program funds.<sup>22</sup> The table below details the disbursements from the nine (9) funds.

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<sup>20</sup> See generally Wireline Competition Bureau Extends Deadline for Annual High-Cost Use Certification to October 31, 2022, WC Docket No. 10-90, Public Notice, [DA 22-928](#) (Sept. 6, 2022).

<sup>21</sup> [47 C.F.R. § 54.314\(d\)](#).

<sup>22</sup> Disbursements reported in whole dollars with rounding. More than 100 ETCs filed FCC Forms 481 this year with each form reporting on a specific SAC.

<b>Fund Name</b>	<b>Fund Acronym</b>	<b>Funding Disbursed in MN - 2020</b>
Alternative Connect America Model	ACAM	\$ 66,216,232
Alternative Connect America Model II	ACAM II	\$ 57,076,714
Connect America Cost Model	CACM	\$ 85,622,880
Connect America Fund Broadband Loop Support	BLS	\$ 11,748,150
Connect America Fund Intercarrier Compensation	ICC	\$ 17,565,816
Connect America Fund Phase II Auction	CAF II Auc	\$ 3,846,744
High Cost Loop	HCL	\$ 4,005,780
Rural Broadband Experiment	RBE	\$ 341,796
Rural Digital Opportunity Fund	RDOF	\$ 1,190,106
<b>Total</b>		<b>\$247,614,218</b>

A brief description of each of these funds is included in Attachment B.

**B. FEDERAL HIGH COST PROGRAM ANNUAL CERTIFICATION REQUIREMENTS.**

Pursuant to the FCC's rules, each year High Cost Program ETCs must provide information and a certification demonstrating:

- They are able to function in emergency situations.
- The pricing of their voice services is no more than two standard deviations above the applicable national average urban rate for voice service.
- Their pricing of a service that meets the FCC's broadband public interest obligations is no more than the applicable benchmark, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states where the ETC receives support.
- Holding company, operating company, affiliate, and any doing-business-as or other branding designations, as well as the related SACs.
- If applicable, 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 services in a culturally sensitive manner;
  - 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 FCC's Wireline Competition and Wireless Telecommunications Bureaus, and the Office of Engineering and Technology.<sup>23</sup>

<sup>23</sup> [47 C.F.R. § 54.313\(a\)\(1\)-\(6\).](#)

### C. FEDERAL HIGH COST PROGRAM BUILD-OUT MILESTONES

High Cost Program ETCs that are subject to specific build-out milestones are required to notify the FCC, USAC, and their states within ten (10) business days if they fail to meet an applicable build-out milestone.<sup>24</sup> Failure to meet a build-out milestone may trigger additional reporting obligations, withholding of support, and/or a recovery action by USAC.<sup>25</sup> “[I]f a state commission determines, after reviewing the annual section 54.313 report, that an ETC did not meet its speed or build-out requirements for the prior year, a state commission should refuse to certify that support is being used for the intended purposes.”<sup>26</sup> Where a state has a concern regarding an ETC’s build-out performance, it is empowered to make a recommendation to the FCC regarding prospective High Cost Program support adjustments or whether to recover past support amounts.<sup>27</sup> Although a state may also elect to revoke a company’s ETC’s status, such a remedy should not be invoked except in the most egregious circumstances and state commissions should first explore other alternatives to remedy concerns about an ETC’s performance.<sup>28</sup>

### D. STATE HIGH COST PROGRAM ANNUAL CERTIFICATION REQUIREMENTS.

Each year, concurrent with its FCC Form 481 filing, a Minnesota High Cost Program ETC must file with the Commission an affidavit that includes:

- The position of the affiant;
- That the affiant understands and is familiar with the requirements of the FCC concerning federal Universal Service funding;
- That the funds are and will be used appropriately (i.e., for their intended purposes);
- That the company is compliant with applicable rules on service quality and consumer protection; and
- 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.<sup>29</sup>

A Minnesota High Cost Program ETC that serves on Tribal lands is required to work with the Commission’s and the Department’s Tribal Liaisons.<sup>30</sup>

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<sup>24</sup> [47 C.F.R. §§ 54.320\(d\)](#) (High Cost ETCs generally); [54.802\(c\)](#) (RDOF ETCs specifically).

<sup>25</sup> [47 C.F.R. §§ 54.315\(c\)\(4\)](#); [54.320\(d\)](#); [54.806](#).

<sup>26</sup> [2011 CAF Order](#), para. 612.

<sup>27</sup> *Id.*

<sup>28</sup> *Id.*, para. 618.

<sup>29</sup> *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*, Docket No. P-999/PR-18-8, ORDER CERTIFYING ELIGIBLE TELECOMMUNICATIONS CARRIERS’ USE OF FEDERAL HIGH-COST SUBSIDY AND REQUIRING COMMENT PERIOD at 3 (Oct. 24, 2018).

<sup>30</sup> *2019 ETC Order* at 3. Note that the FCC has contemplated that ETCs that “fail[] to satisfy the Tribal government engagement obligation would be subject to financial consequences, including potential reduction in support should they fail to fulfill their engagement obligations.” [2011 CAF Order](#), para. 637.

**E. HIGH COST PROGRAM ITEMS FOR DISCUSSION<sup>31</sup>**

**ITEM NO. 1: FCC High Cost Certification Requirements - Whether the High Cost ETCs in Table 1 of OAG Attachment A complied with the FCC's certification requirements for High Cost Program support (see section II.B above).**

**CONCLUSION:** All of the High Cost ETCs in Table 1 of OAG Attachment A complied with the FCC's certification requirements.

*There is no Commission follow-up required for this item.*

**ITEM NO. 2: Commission Affidavit – Whether the High Cost ETCs listed in Table 1 of OAG Attachment A filed the Commission-required affidavits (see section II.D above).**

**CONCLUSION:** All of the High Cost ETCs in Table 1 of OAG Attachment A provided the required affidavit.

*There is no Commission follow-up required for this item.*

**ITEM NO. 3: Form 481 Filing – Whether the High Cost ETCs in Table 1 of OAG Attachment A filed their FCC Forms 481 with the Commission.**

**CONCLUSION:** In 2018, the Commission issued an order requiring High Cost ETCs to file their FCC Forms 481 with the state. All of the High Cost ETCs in Table 1 of OAG Attachment A filed copies of their FCC Forms 481 with the state.

*There is no Commission follow-up required for this item.*

**ITEM NO. 4: Tribal Outreach – Whether the High Cost ETCs in Table 1 of OAG Attachment A engaged in sufficient Tribal engagement.**

**CONCLUSION:** In 2019, the Commission directed High Cost ETCs serving Tribal lands to fully cooperate with the Department, the Tribes, and the Commission. The OAG defers to the Department regarding whether the High Cost ETCs in Table 1 of OAG Attachment A met their calendar year 2021 Tribal engagement obligations.

*The OAG defers to the Department regarding whether there is Commission follow-up required for this item.*

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<sup>31</sup> The OAG continues to recommend that the High Cost ETCs that receive or will receive RDOF funds be required to provide network buildout updates for the first two years they receive RDOF support. Because this recommendation is being addressed in Docket No. P-999/CI-21-86 et al., however, the Commission does not need to reach a decision on that recommendation in this docket.



**ITEM NO. 5: Results of Performance Measures Testing – Whether the Commission has received sufficient information regarding the results of the High Cost ETCs’ performance measures testing.**

**CONCLUSION:** The pre-testing, testing, and testing results dates for performance measures testing are based on High Cost Program ETC type. In 2019, the FCC Wireline Competition and Wireless Telecommunications Bureaus, and the Office of Engineering Technology released the format for network performance testing.<sup>32</sup> The FCC established January 1, 2020 as the earliest pre-testing start date and July 2020 as the earliest testing start date.<sup>33</sup> In 2020, the FCC granted a limited waiver of the performance testing requirements for ACAM, ACAM-I, RBE, and CAF II, reducing their pre-test sample sizes.<sup>34</sup> The first performance measures testing date that applied to the Minnesota High Cost ETCs was January 1, 2021 and the first test results were due in July 2022.

**Schedule for Pre-Testing and Testing<sup>35</sup>**

<b>Fund</b>	<b>Pre-testing Start Date</b>	<b>Pre-testing Results Due</b>	<b>Testing Start Date</b>	<b>Test Results Due</b>
CAF Phase II	January 1, 2020	Following last week of end of Qtr 2020	January 1, 2021	July 2022
RBE	January 1, 2021	Following last week of end of Qtr 2021	January 1, 2022	July 2023
ACAM	January 1, 2021	Following last week of end of Qtr 2021	January 1, 2022	July 2023
ACAM II	January 1, 2022	Following last week of end of Qtr 2021	January 1, 2023	July 2024
BLS	January 1, 2022	Following last week of end of Qtr 2021	January 1, 2023	July 2024
CAF II Auc	January 1, 2022	Following last week of end of Qtr 2021	January 1, 2023	July 2024

<sup>32</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, [FCC 19-104](#), para. 81 (2019) (establishing pre-testing and testing start dates for each of the High Cost Program funds).

<sup>33</sup> *Id.*

<sup>34</sup> See generally *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order, [DA 20-121](#) (Feb. 3, 2020) (waiving and modifying pre-testing requirements); *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order, [DA 20-1512](#) (Dec. 21, 2020) (same as previous).

<sup>35</sup> See USAC Website, Performance Measures Testing, <https://www.usac.org/high-cost/annual-requirements/performance-measures-testing/> (last visited Sept. 22, 2022) (listing pre-testing and testing schedules).



As discussed in section II.B above, the FCC’s rules require High Cost ETCs to provide the results of their performance measures testing as part of the annual certification process.<sup>36</sup> Not all of the High Cost Program ETCs currently make their performance measures testing results available to the Commission. Consequently, the performance measures testing results are not available for the OAG and the Department to review as part of the annual certification process.

Because the FCC’s rules require certain High Cost ETCs to include performance measures testing results with their annual FCC Forms 481, the Commission should require the applicable High Cost ETCs to include their performance measures testing results with the annual FCC Forms 481 that they file with the Commission beginning with the filing year in which their testing results are due.

*The Commission should require the applicable High Cost ETCs to include their performance measures testing results with the annual FCC Forms 481 that they file with the Commission beginning with the filing year in which their testing results are due.*

**ITEM NO. 6: Offering of Stand-Alone Voice Service – Whether High Cost ETCs that receive CAF and ACAM funding are offering the required stand-alone voice service.**

**CONCLUSION:** High Cost ETCs that receive CAF and ACAM funding are required to offer stand-alone voice service.<sup>37</sup> The OAG was able to locate a stand-alone voice service offering on most of the applicable High Cost Program ETCs’ webpages. If the OAG was not able to locate a particular ETC’s stand-alone voice offering, it contacted the ETC seeking the location of the stand-alone voice information. All of the ETCs the OAG contacted provided prompt and detailed responses to the OAG’s inquiries and were able to point the OAG to a stand-alone voice offering.

*There is no Commission follow-up required for this item.*

**ITEM NO. 7: Build-Out Milestones – Whether the High Cost ETCs subject to build-out milestones met those milestones.**

**CONCLUSION:** The OAG conducted a search of eDockets and the FCC’s Electronic Comment Filing System (“ECFS”) and did not identify any letters filed by the Minnesota High Cost ETCs notifying the Commission or the FCC that they failed to meet their 2021 deployment milestones in Minnesota.

*There is no Commission follow-up required for this item.*

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<sup>36</sup> [47 C.F.R. § 54.313\(a\)\(1\)-\(6\)](#).

<sup>37</sup> *In the Matter of Connect America Fund et al.*, WC Docket No. 10-90 et al., Order on Reconsideration, [FCC 18-5](#), para. 20 (2018) (describing the genesis of, and reiterating, the stand-alone voice telephony requirement).

**ITEM NO. 8: High Cost ETCs the Commission should Certify – Whether the Commission should certify the 105 High Cost ETCs on Table 1 of OAG Attachment A that require certification in Minnesota.**

**CONCLUSION:** There are 105 High Cost ETCs listed in Table 1 of OAG Attachment A that are on the Minnesota High Cost annual certification list and require certification by the Commission to receive High Cost support. The OAG reviewed the information filed by all 105 of the High Cost ETCs and sought additional information if it had questions or concerns about a specific ETC's practices. All of the High Cost ETCs the OAG contacted provided prompt and thorough responses to the OAG's inquiries and addressed the OAG's concerns. Accordingly, the OAG recommends certification for all 105 High Cost ETCs that require certification in Minnesota.

*The Commission should certify all 105 Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A.*

**ITEM NO. 9: High Cost ETCs Primarily Operating in Other States – Whether it is necessary for the Commission to certify High Cost ETCs that primarily operate in other states.**

**CONCLUSION:** Some of the High Cost ETCs on the Minnesota High Cost annual certification list primarily operate in other states. These High Cost ETCs are included on the certification lists of both Minnesota and the other states. A list of these High Cost ETCs with the states in which they primarily operate is provided below and in Table 2 of OAG Attachment A.

<u>Company/ETC Name</u>	<u>SAC</u>	<u>State</u>
CenturyTel NW WI	330950	WI
CenturyTel Chester	351126	IA
Polar Telecomm.	381614	ND
Polar Comm Mut Aid	381630	ND
Red River Rural Telephone	381631	ND
Hills Tel Co-SD	391405	SD
Splitrock Telecom Cooperative Inc.	391657	SD

**CONCLUSION:** CenturyTel NW WI (SAC 330950), CenturyTel-Chester (SAC 351126), and Red River Rural Telephone (SAC 381631) filed certification information in Commission Docket No. 22-8. The OAG reviewed that information and does not have any concerns about the certification of these ETCs.

Hills Tel Co-SD (SAC 391405), Polar Telecomm. (SAC 381614), Polar Comm Mut Aid (SAC 381630), and Splitrock Telecom Cooperative Inc. (SAC 391657) did not file information in Commission Docket No. 22-8 so the OAG is not able to assess the merits of their certifications.

As with last year, it is the OAG's understanding that the Department confirmed that all of the above-listed High Cost ETCs will be certified by the other states in which they operate. If those other states fail to certify the High Cost ETCs by October 31, 2022, however, the ETCs' High Cost support for Minnesota could be reduced.<sup>38</sup> In past years, the Commission has certified the High Cost ETCs that primarily operate in other states without incident. Although the Department confirmed that the other states intend to certify these High Cost ETCs, the Commission could also certify them to reduce the potential for an inadvertent funding reduction due to late certification.

***The Commission could certify some or all of the High Cost ETCs in Table 2 of OAG Attachment A.***

**ITEM NO. 10: ETCs the Commission should Not Certify – Whether the Commission should certify all of the ETCs on its certification list.**

**CONCLUSION:** The ETCs listed in Tables 5-6B of OAG Attachment A do not require certification either because they are not included on the Minnesota High Cost annual certification list, they are no longer operational, or they currently solely provide Lifeline-only service. For those SACs listed in Table 5 of OAG Attachment A, the OAG recommends that the Commission send a letter to the FCC and USAC asking them to remove the ETCs from the Minnesota High Cost annual certification list. Because the ETCs listed in Tables 5-6B of OAG Attachment A do not currently receive High Cost Program support, the Commission should *not* certify these ETCs.

***The Commission should not certify the ETCs listed in Tables 5-6B of OAG Attachment A.***

### **III. LIFELINE PROGRAM CERTIFICATION REQUIREMENTS AND ISSUES**

#### **A. FEDERAL LIFELINE PROGRAM ANNUAL CERTIFICATION REQUIREMENTS FOR HIGH COST ETCs**

All ETCs must offer Lifeline services to qualifying low income consumers throughout their designated service areas.<sup>39</sup> In addition, all ETCs must advertise the availability of Lifeline services in a manner reasonably designed to reach the eligible households within their designated service areas.<sup>40</sup> USAC provides guidance on materials and methods to reach eligible households that do not currently receive Lifeline services including, among other things:

- Posting notices at public transportation stops and agencies, shelters, and soup kitchens;
- Running public service announcements; and

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<sup>38</sup> [47 C.F.R. § 54.314\(d\).](#)

<sup>39</sup> [47 C.F.R. § 54.405\(a\).](#)

<sup>40</sup> [47 C.F.R. § 54.405\(b\).](#)

- Providing information booths at central locations.<sup>41</sup>

USAC also recommends developing Lifeline advertising that can be read by any sizeable non-English speaking populations and coordinating with governmental agencies that administer government assistance programs, such as social service agencies, tribal organizations, community centers, public schools, and nursing homes.<sup>42</sup>

Under the FCC’s rules, High Cost Program ETCs that receive Lifeline Program support must annually report holding company, operating company, affiliate, and any doing-business-as or other branding designations, as well as the applicable SACs; and information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan.<sup>43</sup>

## **B. STATE LIFELINE BEST PRACTICES**

On November 25, 2020, the Commission issued an order initiating an investigation into issues related to the offering and advertising of Lifeline services by Minnesota ETCs that receive High Cost Program support.<sup>44</sup> On July 20, 2021, the Commission issued an order establishing best practices for Minnesota High Cost ETCs (“*Lifeline Best Practices Order*”).<sup>45</sup> Specifically, and to the “maximum extent possible”,<sup>46</sup> Minnesota High Cost ETCs must implement the following best practices:

- A website that meets the following criteria:
  - information within three clicks;
  - searchable keywords;
  - periodic functionality checks;
  - all plan information displayed; and
  - continual updates;
- Social media accounts;
- Regular outreach to social service agencies;
- Assign one employee to act as a Lifeline Champion, or train all employees on Lifeline at larger ETCs;
- Community outreach through various means;
- Tribal outreach;

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<sup>41</sup> USAC Website, Lifeline–Additional Requirements–Advertise Lifeline, <https://www.usac.org/lifeline/additional-requirements/advertise-lifeline/> (last visited Sept. 22, 2022).

<sup>42</sup> *Id.*

<sup>43</sup> [47 C.F.R. § 54.422\(a\)](#). To the extent an ETC offers a plan(s) to Lifeline subscribers that is generally available to the public, the ETC may provide summary information regarding such a plan(s), such as a link to a public website that outlines the terms and conditions of the plan(s). *Id.*

<sup>44</sup> See generally *In the Matter of the Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of Federal Universal Service Support Required Pursuant to C.F.R. 54.313*, Docket No. P-999/PR-20-8, ORDER CERTIFYING ELIGIBLE TELECOMMUNICATIONS CARRIERS’ USE OF FEDERAL HIGH-COST SUBSIDY (Nov. 25, 2020).

<sup>45</sup> *In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs*, Docket No. P-999/CI-20-747, ORDER ESTABLISHING BEST PRACTICES AND REQUIRING FILINGS at 8-9 (July 20, 2021).

<sup>46</sup> *Id.* at 8.

- Diverse and disabled population outreach;
- Lifeline information on all disconnection notices;
- Paper materials in various formats; and
- Participate in Lifeline Awareness Week.<sup>47</sup>

The *Lifeline Best Practices Order* also required Minnesota High Cost Program ETCs to file a narrative of their Lifeline outreach efforts in this docket and stated that compliance with best practices (or reasons for noncompliance) would be reviewed as part of the certification process.<sup>48</sup>

### C. LIFELINE PROGRAM ITEMS FOR DISCUSSION

The OAG reached out to many of the Minnesota High Cost Program ETCs (or their consultants) regarding one or more aspects of the ETCs' Lifeline Program compliance. *Every ETC the OAG contacted* promptly and thoroughly responded to the OAG's Lifeline concerns.

#### ITEM NO. 1: Whether the High Cost ETCs filed the required Lifeline outreach narrative in this docket.

**CONCLUSION:** Most, if not all, of the Minnesota High Cost ETCs filed Lifeline outreach narratives with the FCC Forms 481 that they filed in Docket No. 22-8. The Commission made clear in its *Lifeline Best Practices Order* that all High Cost ETCs are required to file an annual Lifeline outreach narrative.<sup>49</sup> Specifically, the Commission found that “[a]ll high-cost ETCs will be required to follow the best practices adopted herein to the maximum extent possible. To evaluate compliance with this requirement, the Commission will require each carrier to file a narrative explanation of its Lifeline outreach efforts with its FCC Form 481 filings. If a carrier does not comply with one or more of the best practices, it should explain its reasons for noncompliance in this narrative filing.”<sup>50</sup>

Because ordering point 2 of the *Lifeline Best Practices Order* states that review of the outreach narratives will occur in Docket No. P-999/PR-21-8, it is possible that some High Cost ETCs are not aware that this is an annual reporting requirement. To prevent confusion in future years, in Docket No. P-999/CI-20-747, the Commission should modify the language from its *Lifeline Best Practices Order* as follows:

2. The companies shall follow the above best practices to the maximum possible extent, and also file a narrative of their Lifeline outreach efforts with the FCC Form 481 filings. The companies' compliance with best practices (or reasons for noncompliance) will be reviewed ~~in the FCC Form 481 filings in Docket No. P-999/PR-21-8~~ annually when the Commission considers recertification of high-cost ETCs.

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<sup>47</sup> *Id.* at 8-9.

<sup>48</sup> *Id.*

<sup>49</sup> *Id.* at 8.

<sup>50</sup> *Id.*

*In Docket No. P-999/CI-20-747, the Commission should modify the language from ordering point 2 of its Lifeline Best Practices Order.*

**ITEM NO. 2: Whether the High Cost ETCs provided active Lifeline weblinks or websites that could be found.**

**CONCLUSION:** The Lifeline weblinks provided in the FCC Forms 481 of a few the High Cost ETCs did not work and/or a working website could not be found. When contacted by the OAG, the ETCs either explained why they do not have a working website, directed the OAG to an updated link, or promptly fixed their weblinks and/or websites.

Some of the High Cost ETCs' Lifeline webpages provided links to Commission or Department websites that are no longer in service. When contacted by the OAG, the ETCs either directed the OAG to an updated link, promptly fixed, or indicated they soon would be fixing the broken links.

*In Docket No. P-999/CI-20-747, the Commission should remind the High Cost ETCs that best practices include periodic reviews of their website links to ensure the links are functioning properly.*

**ITEM NO. 3: Whether the High Cost ETCs provided Lifeline-specific home pages or Lifeline information within three clicks of their home pages.**

**CONCLUSION:** The majority of the High Cost ETCs that have websites have Lifeline-specific home pages. The OAG reached out to any High Cost ETC for which it was not able to find a Lifeline-specific home page or Lifeline-specific information. When contacted by the OAG, the High Cost ETCs either directed the OAG to a Lifeline-specific home page or to Lifeline-specific information that was reachable within three clicks or less from the ETC's home page.

The Lifeline-specific home pages or Lifeline information on some High Cost ETCs' websites was difficult to find, either because buried within a webpage, listed in an unusual place, or was in a smaller font or harder-to-see color than the rest of the webpage.

*In Docket No. P-999/CI-20-747, the Commission should consider adopting as a best practice that the High Cost ETCs ensure that the links to their Lifeline-specific home pages or Lifeline information are easily identifiable.*

**ITEM NO. 4: Whether the High Cost ETCs' websites contained search boxes and searchable keywords.**

**CONCLUSION:** Many of the High Cost ETCs' websites do not contain search boxes and, consequently, cannot be searched using searchable key words. It would be beneficial for these High Cost ETCs to add a search box to their webpages to facilitate customer access to Lifeline information. The Commission should consider encouraging the High Cost ETCs to add a search box to their webpages as a Lifeline best practice.

For those High Cost ETCs that did have search boxes, a search for the term "Lifeline" on their websites typically redirected the OAG to a Lifeline-specific home page or a webpage containing Lifeline information. The OAG notes that the Department recommends common search terms to access Lifeline information in its comments filed in Docket No. P-999/CI-20-747. The Commission may wish to incorporate those search terms into its *Lifeline Best Practices Order*.

*In Docket No. P-999/CI-20-747, the Commission should consider encouraging the High Cost ETCs to add a search box to their webpages as a Lifeline best practice.*

*In Docket No. P-999/CI-20-747, the Commission may wish to incorporate the Department's recommended search terms into its Lifeline Best Practices Order.*

**ITEM NO. 5: Whether the High Cost ETCs' websites provided Lifeline plan information regarding minutes and usage parameters, eligibility and sign-up, terms and conditions, and toll call and additional service charges.**

**CONCLUSION:** As with prior years, while the majority of the High Cost ETCs provided eligibility and sign-up information on their websites, many of them did not include minutes and usage, terms and conditions, and/or toll and additional service charge information. The OAG reached out to any High Cost ETC for which it was unable to find this information to determine if/where such information exists. When contacted by the OAG, the High Cost ETCs either directed the OAG to the Lifeline plan information or explained that they are working to add the information to their websites.

*There is no Commission follow-up required for this item.*

**ITEM NO. 6: Whether the High Cost ETCs included a link to the Lifeline Application on their websites.**

**CONCLUSION:** Although most of the High Cost ETCs included a link to the Lifeline application on their websites, some did not. To facilitate Lifeline enrollment, it



would be beneficial for the High Cost ETCs to include a link to the Lifeline application on their websites.

***In Docket No. P-999/CI-20-747, the Commission should consider adopting as a best practice that the High Cost ETCs include a link to the Lifeline application on their websites.***

**ITEM NO. 7: Whether the High Cost ETCs included a link to their Lifeline-specific home pages or Lifeline information on both their Phone and Internet webpages.**

**CONCLUSION:** The websites for the majority of the High Cost ETCs contain separate Phone and Internet webpages. Some carriers included a link to their Lifeline-specific home pages or Lifeline information on their Phone webpage but not on their Internet webpage and vice versa. Because a Lifeline discount can be applied to Phone or Internet service (or a bundled phone *and* Internet service), it would be beneficial for the High Cost ETCs to include a link to their Lifeline-specific home pages or Lifeline information on both their Phone and Internet webpages.

***In Docket No. P-999/CI-20-747, the Commission should consider adopting as a best practice that the High Cost ETCs include a link to their Lifeline-specific home pages or Lifeline information on both their Phone and Internet webpages.***

**ITEM NO. 8: Whether the Lifeline and TAP discounts on the High Cost ETCs' websites were correct.**

**CONCLUSION:** A number of the High Cost ETCs had outdated Lifeline and/or TAP discount information on their websites. The OAG reached out to any High Cost ETC whose website contained outdated Lifeline and/or TAP discount information. When contacted by the OAG, the High Cost ETCs promptly updated the outdated discount information or indicated that they would do so shortly, as part of a broader refresh of the information on their websites.

***In Docket No. P-999/CI-20-747, the Commission should remind the High Cost ETCs that best practices include continual updates to their Lifeline website information.***

**ITEM NO. 9: Whether the High Cost ETCs included all possible Lifeline discounts on their websites.**

**CONCLUSION:** Some High Cost ETCs solely listed Lifeline voice-only discounts on their websites (or provided links to Lifeline voice-only discounts), while others solely listed Lifeline Internet discounts on their websites (or provided links to Lifeline Internet discounts). Similarly, some High Cost ETCs listed Lifeline voice-

only discounts *and* Lifeline Internet discounts on their websites (or provided links to the information) but did not list the Lifeline bundled discount on their websites.

The OAG reached out to any High Cost ETCs that solely listed the Lifeline discount for voice-only service or solely listed the Lifeline discount for Internet service on their websites. The OAG also reached out to any High Cost ETCs that listed the Lifeline discount for voice-only *and* Lifeline discount for Internet but did not include the Lifeline discount for bundled voice and Internet on their websites. Many High Cost ETCs responded they do not include the Lifeline discounts on their websites because they do not want their websites to contain outdated information if the discount amounts change. A few High Cost ETCs responded that they do not include Lifeline bundled discount information on their websites because it tends to cause customer confusion.

*There is no Commission follow-up required for this item.*

**ITEM NO. 10: Whether the High Cost ETCs advertise Lifeline using social media accounts.**

**CONCLUSION:** The majority of the High Cost ETCs either advertise Lifeline using a social media account or are in the process of using/creating a social media account. Some High Cost ETCs are still considering using/creating social media accounts. High Cost ETCs with limited staff indicated that they do not intend to use/create a social media account at this time. Because it is likely that most Minnesota consumers use social media accounts, the Commission should encourage High Cost ETCs to periodically evaluate the use/creation of social media accounts.

*In Docket No. P-999/CI-20-747, the Commission should encourage High Cost ETCs to periodically evaluate the use/creation of social media accounts.*

**ITEM NO. 11: Whether the High Cost ETCs engaged in regular outreach to social service agencies.**

**CONCLUSION:** The High Cost ETCs had differing perspectives on regular outreach to social service agencies. Some High Cost ETCs contacted social service agencies as a means to disseminate Lifeline information. Other High Cost ETCs did not contact social service agencies because they found such outreach duplicative of their other outreach efforts, challenging because of the breadth of their service territories, or unlikely to provide their customers with an added benefit. At least one High Cost ETC took the position that if a social service agency wanted to view its Lifeline information, it could do so by viewing the publicly available information the ETC's website. Given the varying perspectives on regular outreach to social service agencies and the rationale for the differing approaches, the OAG does not recommend modifying this Lifeline best practice at this time. The Commission may wish to revisit this best practice in a few years, however, after the

High Cost ETCs have had time explore the effectiveness—or lack thereof—of their varying approaches.

*There is no Commission follow-up required for this item.*

**ITEM NO. 12: Whether the High Cost ETCs designated a Lifeline Champion or trained all of their employees on the Lifeline Program.**

**CONCLUSION:** All of the High Cost ETCs reported that they have implemented this Lifeline best practice or are in the process of doing so.

*There is no Commission follow-up required for this item.*

**ITEM NO. 13: Whether the High Cost ETCs conducted community outreach through various means.**

**CONCLUSION:** The majority of the High Cost ETCs reported that they conduct community outreach through various means or are planning to do so. Two of the smallest High Cost ETCs reported that they do not plan to conduct community outreach because their small size allows them to engage with their customers individually.

*There is no Commission follow-up required for this item.*

**ITEM NO. 14: Whether the High Cost ETCs made Tribal governments aware of enhanced Lifeline benefits for Tribal lands.**

**CONCLUSION:** As noted in section II.E above, the OAG defers to the Department regarding whether the Minnesota High Cost Program ETCs have met their Tribal requirements.

*The OAG defers to the Department regarding whether there is Commission follow-up required for this item.*

**ITEM NO. 15: Whether the High Cost ETCs conducted outreach to diverse and disabled populations.**

**CONCLUSION:** As with regular outreach to social service agencies, the High Cost ETCs had differing perspectives on the Lifeline best practice of conducting outreach to diverse and disabled populations. Moreover, as the Department notes in Docket No. P-999/CI-20-747 “there is some confusion on what constitutes appropriate outreach to diverse and disabled populations.”<sup>51</sup> Accordingly, the

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<sup>51</sup> In the Matter of Filings submitted by high-cost, Eligible Telecommunications Carriers in compliance with the Commission’s July 20, 2021 Order Establishing Best Practices and Requiring Filings in Docket No. P999/CI-20-747, Docket No. P-999/CI-20-747, PUBLIC Comments of the Minnesota Department of Commerce at 9 (Sept. 6, 2022).

OAG agrees with the Department that “[t]he Commission may wish to clarify this best practice to improve the outreach efforts to diverse and disabled populations.”<sup>52</sup>

*The Commission may wish to clarify its diverse and disabled population outreach best practice to improve the outreach efforts to diverse and disabled populations.*

**ITEM NO. 16: Whether the High Cost ETCs included Lifeline information on all disconnection notices.**

**CONCLUSION:** Many High Cost ETCs agreed to include Lifeline information on their disconnection notices. Some High Cost ETCs indicated a willingness to consider adding the Lifeline information on their disconnection notices. A few High Cost ETCs stated that they do not include Lifeline information on their disconnection notices. Because multiple parties have already filed comments on this best practice in Docket No. P-999/CI-20-747, the OAG refrains from discussing it here.

*Because multiple parties have filed comments in Docket No. P-999/CI-20-747 regarding the Lifeline best practice of including Lifeline information on all disconnection notices, the OAG refrains from discussing it here.*

**ITEM NO. 17: Whether the High Cost ETCs provided their paper Lifeline materials in various formats.**

**CONCLUSION:** The High Cost ETCs reported that they provide their paper Lifeline materials in various formats and provided screen shots or copies of those paper materials. Accordingly, there is no action item for the Commission with respect to this best practice.

*There is no Commission follow-up required for this item.*

**ITEM NO. 18: Whether the High Cost ETCs participated in Lifeline Awareness Week.**

**CONCLUSION:** Although most of the High Cost ETCs seem willing to participate in Lifeline Awareness Week, a few reported that they are not, and some failed to report on this best practice whatsoever. Those that are hesitant to participate state concerns related to small size and/or limited staff. Because Lifeline Awareness week is a valuable means to disseminate Lifeline information to customers, the OAG recommends retaining this Lifeline best practice.

*There is no Commission follow-up required for this item.*

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<sup>52</sup> *Id.*

#### IV. SUMMARY OF RECOMMENDATIONS

As a result of its annual ETC certification review, the OAG recommends that the Commission take the following actions with respect to the Minnesota High Cost Program ETCs:

- Certify all 105 Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A;
- Certify some or all of the High Cost ETCs listed in Table 2 of OAG Attachment A; and
- Do not certify the ETCs listed in Tables 5-6B of OAG Attachment A.

The OAG will file the Lifeline best practice recommendations from these comments in Docket No. P-999/CI-20-747 and so that the Commission and all interested parties have the opportunity to review and respond to the recommendations.

#### CONCLUSION

The OAG recommends that the Commission certify the High Cost ETCs listed in Tables 1 and 2 of OAG Attachment A. The OAG did not identify any High Cost rule violations sufficient to warrant a denial of High Cost ETC status at this time. If the OAG subsequently identifies a High Cost rule violation(s) that requires the Commission's attention, the OAG will submit a filing in this or another Commission docket to address any potential federal Universal Service non-compliance.

Dated: September 26, 2022

Respectfully submitted,

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## OAG Attachment A

### Eligible Telecommunications Carrier Certification List for the Minnesota Public Utilities Commission (2022)

#### I. High Cost Eligible Telecommunications Carriers the Minnesota Public Utilities Commission Should Certify

The eligible telecommunications carriers (“ETC”) listed below are included on the Minnesota federal Universal Service High Cost Program (“High Cost”) annual certification list generated by the Universal Service Administrative Company (“USAC”) and should be certified by the Minnesota Public Utilities Commission (“Commission”).

<b>Table 1</b> <b>Minnesota High Cost ETCs</b> <b>the Commission Should Certify</b>					
<b>No.</b>	<b>Study Area Code (“SAC”)</b>	<b>ETC Name</b>	<b>State</b>	<b>ETC Type</b>	<b>Certification (Y/N)</b>
1	361346	ACE TEL ASSN-MN	MN	ILEC	Y
2	361347	ALBANY MUTUAL ASSN	MN	ILEC	Y
3	361374	ARROWHEAD COM CORP	MN	ILEC	Y
4	361350	ARVIG TEL CO	MN	ILEC	Y
5	369051	ARROWHEAD ELECTRIC COOPERATIVE	MN	CETC	Y
6	361356	BENTON COOP TEL CO	MN	ILEC	Y
7	361358	BLUE EARTH VALLEY	MN	ILEC	Y
8	361362	BRIDGEWATER TEL CO	MN	ILEC	Y
9	369043	BROADBAND CORP	MN	CETC	Y
10	361445	CENTURYTEL-MINNESOTA	MN	ILEC	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	361123	CITIZENS-FRONTIER-MN	MN	ILEC	Y
15	367123	CITIZENS-FRONTIER-MN	MN	ILEC	Y
16	361353	CITY OF BARNESVILLE	MN	ILEC	Y
17	361370	CLARA CITY TEL EXCH	MN	ILEC	Y
18	361372	CLEMENTS TEL CO	MN	ILEC	Y
19	361373	CONSOLIDATED TEL CO	MN	ILEC	Y
20	369044	CONSOLIDATED TELEPHONE COMPANY	MN	CETC	Y
21	361499	CROSSLAKE TEL CO	MN	ILEC	Y
22	361381	DUNNELL TEL CO	MN	ILEC	Y
23	361383	EAGLE VALLEY TEL CO	MN	ILEC	Y
24	361385	EAST OTTER TAIL TEL	MN	ILEC	Y
25	361384	EASTON TEL CO	MN	ILEC	Y

**OAG Attachment A**

**Eligible Telecommunications Carrier Certification List  
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**Table 1**  
**Minnesota High Cost ETCs  
the Commission Should Certify**

<b>No.</b>	<b>Study Area Code ("SAC")</b>	<b>ETC Name</b>	<b>State</b>	<b>ETC Type</b>	<b>Certification (Y/N)</b>
26	361386	ECKLES TEL CO	MN	ILEC	Y
27	361456	EMBARQ MINNESOTA	MN	ILEC	Y
28	361387	EMILY COOP TEL CO	MN	ILEC	Y
29	361389	FARMERS MUTUAL TEL	MN	ILEC	Y
30	361390	FEDERATED TEL COOP	MN	ILEC	Y
31	366130	FEDERATED TELEPHONE COOPERATIVE	MN	CETC	Y
32	361403	FEDERATED UTILITIES	MN	ILEC	Y
33	361391	FELTON TEL CO. INC.	MN	ILEC	Y
34	361367	FRONTIER-MINNESOTA	MN	ILEC	Y
35	361395	GARDEN VALLEY TEL CO	MN	ILEC	Y
36	369039	GARDEN VALLEY TELEPHONE COMPANY	MN	CETC	Y
37	361396	GARDONVILLE COOP TEL	MN	ILEC	Y
38	361399	GRANADA TEL CO	MN	ILEC	Y
39	361401	HALSTAD TEL CO	MN	ILEC	Y
40	369020	FARMERS MUTUAL TELEPHONE COMPANY	MN	CETC	Y
41	369040	HALSTAD TELEPHONE COMPANY	MN	CETC	Y
42	361404	HARMONY TEL. CO.	MN	ILEC	Y
43	361405	HILLS TEL CO, INC	MN	ILEC	Y
44	361408	HOME TEL CO - MN	MN	ILEC	Y
45	361409	HUTCHINSON TEL CO	MN	ILEC	Y
46	361654	INTERSTATE TELECOMM.	MN	ILEC	Y
47	369041	INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC.	MN	CETC	Y
48	369038	JAGUAR COMMUNICATIONS, INC.	MN	CETC	Y
49	361410	JOHNSON TEL CO	MN	ILEC	Y
50	361412	KASSON & MANTORVILLE	MN	ILEC	Y
51	361419	LISMORE COOP TEL CO	MN	ILEC	Y
52	361422	LONSDALE TEL CO	MN	ILEC	Y
53	361443	LORETEL SYSTEMS INC	MN	ILEC	Y
54	369047	LTD Broadband LLC	MN	CETC	Y
55	361424	MABEL COOP TEL – MN	MN	ILEC	Y
56	361426	MANCHESTER-HARTLAND	MN	ILEC	Y
57	361427	MANKATO-HICKORYTECH	MN	ILEC	Y



**OAG Attachment A**

**Eligible Telecommunications Carrier Certification List  
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<b>No.</b>	<b>Study Area Code ("SAC")</b>	<b>ETC Name</b>	<b>State</b>	<b>ETC Type</b>	<b>Certification (Y/N)</b>
58	361430	MELROSE TEL CO	MN	ILEC	Y
59	361375	MID-COMM-HICKORYTECH	MN	ILEC	Y
60	369015	MIDCONTINENT COMMUNICATIONS	MN	CETC	Y
61	361413	MID STATE DBA KMP	MN	ILEC	Y
62	361433	MID STATE TEL CO	MN	ILEC	Y
63	361431	MIDWEST TEL CO	MN	ILEC	Y
64	361439	MINNESOTA VALLEY TEL	MN	ILEC	Y
65	361442	NEW ULM TELECOM, INC	MN	ILEC	Y
66	361500	NORTHERN TEL CO - MN	MN	ILEC	Y
67	361448	OSAKIS TEL CO	MN	ILEC	Y
68	361450	PARK REGION MUTUAL	MN	ILEC	Y
69	361451	PAUL BUNYAN RURAL	MN	ILEC	Y
70	366132	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	MN	CETC	Y
71	366133	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	MN	CETC	Y
72	361453	PEOPLES TEL CO - MN	MN	ILEC	Y
73	361454	PINE ISLAND TEL CO	MN	ILEC	Y
74	365142	QWEST CORP-MN	MN	ILEC	Y
75	369054	RED RIVER TELEPHONE ASSOCIATION dba RED RIVER COMMUNICATION	MN	CETC	Y
76	361472	REDWOOD COUNTY TEL	MN	ILEC	Y
77	369045	ROSEAU ELECTRIC COOPERATIVE, INC.	MN	CETC	Y
78	361474	ROTHSAY TEL CO, INC	MN	ILEC	Y
79	361475	RUNESTONE TEL ASSN	MN	ILEC	Y
80	361423	RUNESTONE TELEPHONE ASSOCIATION	MN	ILEC	Y
81	361476	SACRED HEART TEL CO	MN	ILEC	Y
82	369052	SAVAGE COMMUNICATIONS	MN	CETC	Y
83	361479	SCOTT RICE – INTEGRA	MN	ILEC	Y
84	361483	SLEEPY EYE TEL CO	MN	ILEC	Y
85	361485	SPRING GROVE COOP	MN	ILEC	Y
86	361487	STARBUCK TEL CO	MN	ILEC	Y
87	369007	TEKSTAR COMMUNICATIONS, INC.	MN	CETC	Y

**OAG Attachment A**

**Eligible Telecommunications Carrier Certification List  
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**Table 1**  
**Minnesota High Cost ETCs  
the Commission Should Certify**

<b>No.</b>	<b>Study Area Code ("SAC")</b>	<b>ETC Name</b>	<b>State</b>	<b>ETC Type</b>	<b>Certification (Y/N)</b>
88	361491	TWIN VALLEY-ULEN TEL	MN	ILEC	Y
89	361494	UPSALA COOP TEL ASSN	MN	ILEC	Y
90	361495	VALLEY TEL CO - MN	MN	ILEC	Y
91	361501	WEST CENTRAL TEL	MN	ILEC	Y
92	369042	WEST CENTRAL TELEPHONE ASSOCIATION	MN	CETC	Y
93	361502	WESTERN TEL CO	MN	ILEC	Y
94	361505	WIKSTROM TEL CO, INC	MN	ILEC	Y
95	369046	WIKSTROM TELEPHONE COMPANY	MN	CETC	Y
96	361348	WILDERNESS VALLEY	MN	ILEC	Y
97	361414	WINDSTREAM COMMUNICATIONS, INC.	MN	ILEC	Y
98	361482	WINDSTREAM COMMUNICATIONS, INC.	MN	ILEC	Y
99	361337	WINNEBAGO COOP ASSN	MN	ILEC	Y
100	369029	WINNEBAGO COOPERATIVE TELECOM ASSOCIATION	MN	CETC	Y
101	361507	WINSTED TEL CO	MN	ILEC	Y
102	361508	WINTHROP TEL CO	MN	ILEC	Y
103	361512	WOLVERTON TEL CO	MN	ILEC	Y
104	361510	WOODSTOCK TEL CO	MN	ILEC	Y
105	361515	ZUMBROTA TEL CO	MN	ILEC	Y

## OAG Attachment A

### Eligible Telecommunications Carrier Certification List for the Minnesota Public Utilities Commission (2022)

#### II. High Cost ETCs Who Likely Will be Certified by Other States but Could Also be Certified by the Commission

Some of the High Cost ETCs on the Minnesota High Cost annual certification list primarily operate in other states. These High Cost ETCs are included on the High Cost annual certification lists of both Minnesota and the other states. Although these High Cost ETCs likely will be certified by other states, the Commission could also certify them to reduce the potential for an inadvertent funding reduction due to late certification.

**Table 2**  
**High Cost ETCs Who Likely Will be Certified by Other States  
but Could Also be Certified by the Commission**

No.	Study Area Code ("SAC")	ETC Name	State	ETC Type	Certification (Y/N)
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 ASSOC.	ND	ILEC	Optional
6	391405	HILLS TEL CO-SD	SD	ILEC	Optional
7	391657	SPLITROCK TELECOM COOPERATIVE INC.	SD	ILEC	Optional

## OAG Attachment A

### Eligible Telecommunications Carrier Certification List for the Minnesota Public Utilities Commission (2022)

#### III. ETCs the Commission Should Not Certify

This table is replaced by Tables 4-6B, which contain additional detail. The Table 3 heading is included in this Attachment for consistency with last year's Commission ETC certification order.

<b><u>Table 3</u></b> <b>ETCs the Commission Should Not Certify</b>					
<b>No.</b>	<b>Study Area Code ("SAC")</b>	<b>ETC Name</b>	<b>State</b>	<b>ETC Type</b>	<b>Certification (Y/N)</b>

## OAG Attachment A

### Eligible Telecommunications Carrier Certification List for the Minnesota Public Utilities Commission (2022)

#### IV. Minnesota High Cost ETCs Who Do Not Require Certification but Who Filed Information with the Commission

Table 4 lists one High Cost ETC who does not require certification (i.e., is not included on the Minnesota High Cost annual certification list generated by USAC) but who filed information and requests to be certified by the Commission.

<b>Table 4</b> <b>Minnesota High Cost ETCs Who Do Not Require Certification</b> <b>but Who Filed Information with the Commission</b>			
<b>No.</b>	<b>Study Area Code ("SAC")</b>	<b>ETC Name</b>	<b>Certification (Follow-Up Required)</b>
1	369053	GARDONVILLE COOP TEL	See footnote <sup>1</sup>

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<sup>1</sup> This SAC filed an FCC Form 481 with the Commission and requests certification. Because the SAC is not included on the Minnesota High Cost annual certification list generated by USAC, however, the Commission will need to reach out to the Federal Communications Commission ("FCC") and USAC to certify this filer outside of the typical check-box process. The OAG and the Department will discuss how this can be accomplished and address this filer further in reply comments.

## OAG Attachment A

### Eligible Telecommunications Carrier Certification List for the Minnesota Public Utilities Commission (2022)

#### V. High Cost ETCs Who are Included on the Commission's Certification List but Who are No Longer Operational

Table 5 lists High Cost ETCs who are included on the Minnesota High Cost annual certification list generated by USAC but who are no longer operational. *The Commission should consider writing to the Federal Communications Commission ("FCC") and USAC to request that these ETCs be permanently removed from Minnesota's High Cost annual certification list.*

<b>Table 5</b> <b>High Cost ETCs Who are Included on the Commission's Certification List but Who are No Longer Operational</b>			
<b>No.</b>	<b>Study Area Code ("SAC")</b>	<b>ETC Name</b>	<b>Certification (Y/N)</b>
1	361357	BLACKDUCK TEL CO	N
2	361437	MINNESOTA LAKE TEL	N
3	366110	LAKE COUNTY d/b/a LAKE CONNECTIONS <sup>2</sup>	N
4	369003	HOMETOWN SOLUTIONS	N

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<sup>2</sup> The FCC rescinded Lake County's ETC status effective December 18, 2019. *See In the Matter of the Petition of Lake County Minnesota for Relinquishment of its Status as a Rural Broadband Experiments Support Recipient and for a Section 1.3 Waiver of the Deployment Schedule*, WC Docket Nos. 10-90 and 14-259, Order, DA 19-1295, para. 20 (Dec. 18, 2019).

## OAG Attachment A

### Eligible Telecommunications Carrier Certification List for the Minnesota Public Utilities Commission (2022)

#### VI. Wireless and Wireline ETCs Who Do Not Receive High Cost Support and Do Not Require Certification by the Commission

Tables 6A and 6B list wireless and wireline ETCs, respectively, who do not receive High Cost support and do not require certification by the Commission.

<b>Table 6A</b> <b>Wireless ETCs Who Do Not Receive High Cost Support</b> <b>and Do Not Require Certification by the Commission</b>			
No.	Study Area Code ("SAC")	ETC Name	Certification (N/A <sup>3</sup> or N <sup>4</sup> )
1	369016	TELRITE CORPORATION DBA LIFE WIRELESS	N/A
2	369032	TRACFONE WIRELESS, LLC	N
3	369023	I-WIRELESS	N/A
4	369024	Q LINK WIRELESS	N/A
5	369025	BOOMERANG WIRELESS	N/A
6	369028	TAG MOBILE, LLC	N/A
7	369033	TEMPO TELECOM, LLC	N/A
8	369018	ASSURANCE WIRELESS USA LP	N/A
9	369030	AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY	N/A
10	369036	NORTH AMERICAN LOCAL LLC	N/A
11	369022	GLOBAL CONNECTIONS INC OF AMERICA DBA STANDUP WIRLESS	N/A
12	369017	TERRACOM WIRELESS <sup>5</sup>	N/A
13	369014	T-MOBILE CENTRAL LLC <sup>6</sup>	N
14	369034	SAGE TELECOM COMMUNICATIONS LLC DBA TRUCONNECT	N/A

<sup>3</sup> An "N/A" denotes an ETC that may have filed its FCC Form 481 with the Commission but *does not* appear on the Minnesota High Cost annual certification list generated by USAC.

<sup>4</sup> An "N" denotes an ETC that may have filed its FCC Form 481 with the Commission and *does* appear on the Minnesota High Cost annual certification list generated by USAC.

<sup>5</sup> The OAG understands that Terracom provided a copy of its FCC Form 481 directly to the Department.

<sup>6</sup> The Commission approved T-Mobile's request to relinquish its High-Cost Program ETC status effective December 31, 2020. *See In the Matter of the Petition of T-Mobile Central LLC for Relinquishment of its High-Cost Status as an Eligible Telecommunications Carrier (ETC)*, Docket No. P-6856/M-20-894, ORDER at 1 (Feb. 23, 2021).



## OAG Attachment A

### Eligible Telecommunications Carrier Certification List for the Minnesota Public Utilities Commission (2022)

<b>Table 6B</b> <b>Wireline ETCs Who Do Not Receive High Cost Support and Do Not Require Certification by the Commission</b>			
<b>No.</b>	<b>Study Area Code ("SAC")</b>	<b>ETC Name</b>	<b>Certification (N/A<sup>7</sup> or N<sup>8</sup>)</b>
1	369021	FEDERATED TELEPHONE COOPERATIVE	N/A
2	369049	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	N/A
3	369050	GARDEN VALLEY TELEPHONE COMPANY	N/A
4	369914	CONSOLIDATED TELEPHONE COMPANY	N/A

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<sup>7</sup> An "N/A" denotes an ETC that may have filed its FCC Form 481 with the Commission but *does not* appear on the Minnesota High Cost annual certification list generated by USAC.

<sup>8</sup> An "N" denotes an ETC that may have filed its FCC Form 481 with the Commission and *does* appear on the Minnesota High Cost annual certification list generated by USAC.

## OAG Attachment B

### Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2021

**Alternative Connect America Model (ACAM)**<sup>1</sup> – 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. ACAM models the forward-looking economic costs of deploying a high-speed network and delivering broadband service. Carriers that elected this option receive predictable monthly payments to provide voice and broadband service to all funded locations over the program’s 10-year support term (2017-2026).

#### **Deployment Obligations**

Carriers must offer at least one commercial voice and one commercial broadband service that meet the relevant service requirements, and must meet the following broadband deployment milestones:

- 40% of deployments by the end of year 4
- 50% of deployments by the end of year 5
- 60% of deployments by the end of year 6
- 70% of deployments by the end of year 7
- 80% of deployments by the end of year 8
- 90% of deployments by the end of year 9
- 100% of deployments by the end of year 10

**Alternative Connect America Cost Model II (ACAM II)**<sup>2</sup> - Established by the 2018 Rate-of-Return Reform Order, the Alternative Connect America Cost Model (ACAM) II 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. Carriers that elected this option receive predictable monthly payments based on support of up to \$200 for each funded location over the program’s 10-year support term (2017-2026). (Carriers electing ACAM II support receive transition payments if their ACAM II support is less than their 2018 legacy support.) Participating carriers must meet annual deployment milestones starting in year four, 2022.

**Connect America Cost Model (CACM)**<sup>3</sup> – The Connect America Cost Model, commonly called “CAF Phase II,” provides support to price- cap carriers based on a forward-looking model of the cost of constructing modern networks for deploying voice and broadband services in states with unserved areas. This is a six-year fund that began in 2015 when the FCC awarded 10 telecommunications carriers over \$1.5 billion in annual support to build voice- and broadband-capable infrastructure in their areas.

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<sup>1</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/acam/> (last visited Sept. 19, 2022).

<sup>2</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/acam-ii/> (last visited Sept. 19, 2022).

<sup>3</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-phase-ii/> (last visited Sept. 19, 2022).

## OAG Attachment B

### Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2021

#### Deployment Obligations

In order to receive CAF II funding, carriers must offer at least one voice and one broadband service commercially. These services must meet the relevant service requirements and go to the required number of locations.

Carriers must complete:

- 40 % of deployments by the end of year 3
- 60 % of deployments by the end of year 4
- 80 % of deployments by the end of year 5
- 100 % of deployments by the end of year 6

**Connect America Fund Phase II Auction (CAF II Auction)**<sup>4</sup> - 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 did not accept CAF Phase II model-based funding and in extremely high-cost areas located within the service areas of the incumbent price cap carriers. After a reverse auction bidding process (Auction 903) completed in 2018, the FCC awarded a total of \$1.49 billion over 10 years to more than 100 winning bidders to provide fixed broadband and voice services to over 700,000 locations in 45 states.

#### Deployment Obligations

In order to receive CAF II Auction funding, carriers must offer at least one stand-alone voice service plan and one plan that provides broadband service commercially. These services must meet the relevant service requirements to the requisite number of locations.

Carriers must complete:

- 40 % of deployments by the end of year 3
- 60 % of deployments by the end of year 4
- 80 % of deployments by the end of year 5
- 100 % of deployments by the end of year 6

**Connect America Fund Broadband Loop Support (BLS)**<sup>5</sup> – Connect America Fund Broadband Loop Support (CAF-BLS) provides support for voice and broadband service, including stand-alone broadband. The fund, a reform of Interstate Common Line Support (ICLS), helps carriers recover the difference between loop costs associated with providing voice and/or broadband service and consumer loop revenues. In 2018, the FCC set a budget of \$1.42 billion for CAF-BLS, which will rise annually with inflation, and reduced the monthly per-line limit on support from \$250 to \$225 as of July 2019 and \$200 as of July 2021. The 2018 order also establishes new

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<sup>4</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-phase-ii-auction/> (last visited Sept. 19, 2022).

<sup>5</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-broadband-loop-support/> (last visited Sept. 19, 2022).

## OAG Attachment B

### Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2021

deployment obligations for carriers remaining on CAF-BLS support, requiring them to expand deployment of broadband at speeds of 25/3 Mbps by 2024.

**Connect America Fund Inter-carrier Compensation (ICC)**<sup>6</sup> - The Inter-carrier Compensation (ICC) Recovery is the component of the Connect America Fund that introduces reforms to the inter-carrier compensation system. ICC Recovery support went into effect in July 2012 and allows incumbent local exchange carriers (ILECs) to charge residential customers an Access Recovery Charge (ARC) on a limited basis. It also allows ILECs to recover charges from certain multiline business customers. If eligible, ILECs may receive additional recovery funds, provided they meet certain broadband service obligations.

**High Cost Loop Support (HCL)**<sup>7</sup> - High Cost Loop (HCL) support is available to rural price-cap and rate-of-return incumbent carriers and competitive carriers providing service in the areas of these rural companies, which must be designated as ETCs. HCL provides support for the last mile of connection for rural companies in service areas where the cost to provide this service exceeds 115 percent of the national average cost per line. ROR carriers have updated limits on capital and operating costs for HCL support and updated corporate operating expense limits for HCL support as well as ICLS.

**Rural Broadband Experiment (RBE)**<sup>8</sup> - 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.

**Rural Digital Opportunity Fund (RDOF)**<sup>9</sup> - The Rural Digital Opportunity Fund (RDOF) will disburse up to \$20.4 billion over 10 years to bring fixed broadband and voice service to millions of unserved homes and small businesses in rural America. The RDOF Phase I Auction ended on Nov. 25, 2020 and awarded \$9.2 billion in support to 180 winning bidders, including incumbent telephone companies, cable operators, electric cooperatives, satellite operators and fixed wireless providers. Winning bidders have committed to deploy broadband to more than 5.2 million homes and small businesses in census blocks that previously lacked broadband service with minimum speeds of 25 megabits per second downstream and 3 megabits per second upstream (25/3 Mbps). Nearly all of these locations are expected to receive access to broadband speeds of at least 100 megabits per second downstream and 20 megabits per second upstream (100/20 Mbps), and more than 85 percent are in areas where the winning bidder has committed to provide gigabit-speed service.

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<sup>6</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/icc-recovery/> (last visited Sept. 19, 2022).

<sup>7</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/high-cost-loop/> (last visited Sept. 19, 2022).

<sup>8</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/rural-broadband-experiments/> (last visited Sept. 19, 2022).

<sup>9</sup> All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/rural-digital-opportunity-fund/> (last visited Sept. 19, 2022).

## **OAG Attachment B**

### **Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2021**

While RDOF support will be disbursed over a period of 10 years, carriers must complete deployment by the end of the eighth year to all locations in areas eligible for support and must meet interim deployment milestones along the way. A reassessment in year six of the program will revise location counts and deployment obligations (and adjust support in certain circumstances).

#### **Deployment Obligations**

RDOF participants must offer stand-alone voice service and broadband service at speeds consistent with their winning bids (which must be at least 25 Mbps downstream and 3 Mbps upstream (25/3 Mbps)) at rates reasonably comparable to those available in urban areas to all locations within an awarded area over eight years of the 10-year program. Initial interim deployment milestones are based on those adopted for the CAF Phase II Auction program.

Carriers must complete:

- 40 percent of deployments by the end of year 3  
(the end of the third full calendar year following funding authorization)
- 60 percent of deployments by the end of year 4
- 80 percent of deployments by the end of year 5
- 100 percent of deployments by the end of year 6



The Office of  
**Minnesota Attorney General Keith Ellison**  
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September 26, 2022

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: *In the Matter of the Annual Certifications Related to Eligible Telecommunications Carriers' (ETC) Use of Federal Universal Service Support***  
**MPUC Docket No. P-999/PR-22-8**

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ Kristin Berkland

KRISTIN BERKLAND

Assistant Attorney General

(651) 757-1236 (Voice)

(651) 296-9663 (Fax)

[kristin.berkland@ag.state.mn.us](mailto:kristin.berkland@ag.state.mn.us)

## CERTIFICATE OF SERVICE

**Re: *In the Matter of the Annual Certifications Related to Eligible Telecommunications Carriers' (ETC) Use of Federal Universal Service Support***  
**MPUC Docket No. P-999/PR-22-8**

I, DEBORAH POOLE, hereby certify that on the 26th day of September, 2022, I e-filed with eDockets *Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Deborah Poole  
DEBORAH POOLE



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Issa	Asad	reg@qlinkwireless.com	Q Link Wireless LLC	499 E Sheridan St Ste 400 Dania Beach, FL 33004	Electronic Service	No	OFF_SL_22-8_PR-22-8
Sam	Bailey	Sam.Bailey@iwirelesshom e.com	i-Wireless	1 Levee Way Ste 3116 Newport, KY 41071	Electronic Service	No	OFF_SL_22-8_PR-22-8
Tracy	Bandemer	Tracy.Bandemer@itccoop. com	Interstate Telecommunications Cooperative, Inc..	3124 h St W PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_22-8_PR-22-8
Dianne	Barthel	dianne_barthel@lumen.com	Centurylink Communications, LLC	200 S 5th St Rm 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-8_PR-22-8
James	Beattie	jbeattie@bevecomm.com	Rural Communications Holding Corp.	123 W 7th Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56221	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_22-8_PR-22-8
David	Bickett	dave.bickett@parkregion.c om	Otter Tail Telcom	PO Box 277 100 Main St Underwood, MN 56586	Electronic Service	No	OFF_SL_22-8_PR-22-8
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_22-8_PR-22-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karl	Blake	kblake@polaritel.com	Polar Communications Mutual Aid Corp.	PO Box 270 110 Fourth Street East Park River, ND 58270	Electronic Service	No	OFF_SL_22-8_PR-22-8
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_22-8_PR-22-8
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_22-8_PR-22-8
Chad	Bullock	chadb@wcta.net	West Central Telephone Association	308 Frontage Road PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_22-8_PR-22-8
Thomas	Bums	tgurns@otcpas.com	OLSEN THIELEN & CO. LTD	2675 Long Lake Rd Saint Paul, MN 55113	Electronic Service	No	OFF_SL_22-8_PR-22-8
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	OFF_SL_22-8_PR-22-8
DANYELL	CARROLL	danyell.carroll@windstream.com	Windstream Services, LLC	4001 N Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_22-8_PR-22-8
Thomas	Campbell	tcampbell@otcpas.com	Olsen Thielen	2675 Long Lake Road St. Paul, MN 55309	Electronic Service	No	OFF_SL_22-8_PR-22-8
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.	P.O. Box 920 312 Fourth Street Clear Lake, SD 57226	Electronic Service	No	OFF_SL_22-8_PR-22-8
Andrew	Carlson	acarlson@taftlaw.com	Taft Stettinius & Hollister LLP	Suite 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-8_PR-22-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Carpenter	jim.carpenter@telrite.com	Telrite Corporation	1110 Alcovy Rd Covington, GA 30014	Electronic Service	No	OFF_SL_22-8_PR-22-8
Generic Notice	Commerce Attomeys	commerce.attomeys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-8_PR-22-8
Teresa	Crews	tcrows@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	Suite 100 1831 Anne Street Bemidji, MN 56601	Electronic Service	No	OFF_SL_22-8_PR-22-8
Angie	Dickison	Angie.dickison@tdstelecom.com	TDS Telecom LLC	525 Junction Road  Madison, WI 53717	Electronic Service	No	OFF_SL_22-8_PR-22-8
Angie	Dickison	angie.dickison@state.mn.us	MN DEED	332 Minnesota St E200 MN DEED St Paul, MN 55101	Electronic Service	No	OFF_SL_22-8_PR-22-8
Donna	Eul	Donna.Eul@Aciracoop.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_22-8_PR-22-8
Donna	Eul	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S  Bellingham, MN 56212	Electronic Service	No	OFF_SL_22-8_PR-22-8
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St  Lincoln, NE 68508	Electronic Service	No	OFF_SL_22-8_PR-22-8
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd  Columbus, OH 43231-5931	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	OFF_SL_22-8_PR-22-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Shari	Flanders	sflanders@polaritel.com	Polar Communications	PO Box 270 Park River, ND 58270	Electronic Service	No	OFF_SL_22-8_PR-22-8
Travis	Floyd	travisf@wcta.net	West Central Telephone Assoc	308 Frontage Rd PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_22-8_PR-22-8
Mark	Forseth	markforseth@rv.net	Halstad Telephone Company	Box 55 345 2nd Ave West Halstad, MN 56548	Electronic Service	No	OFF_SL_22-8_PR-22-8
Julie	Geerdes	jgeerdes@paulbunyan.net	Paul Bunyan Rural Telephone Coop	1831 Anne St. NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_22-8_PR-22-8
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William	Haas	william.haas@t-mobile.com	T-Mobile US	P.O. Box 10076 Cedar Rapids, IA 52410	Electronic Service	No	OFF_SL_22-8_PR-22-8
Roxi	Hacker	roxih@interstatetel.com	Interstate Telcom Consulting	130 Birch Avenue West Hector, Minnesota 55342	Electronic Service	No	OFF_SL_22-8_PR-22-8
Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1104 19th Ave SW Ste B Willmar, MN 56201	Electronic Service	No	OFF_SL_22-8_PR-22-8
Corey	Hauer	coreyhauer@gmail.com	LTD Broadband LLC	69 Teahouse St Las Vegas, NV 89138	Electronic Service	No	OFF_SL_22-8_PR-22-8
Donna	Heaston	Donna.Heaston@Allstream.com	Electric Lightwave, LLC (New)	dba Allstream 2800 Campus Dr Ste 140 Plymouth, MN 55441	Electronic Service	No	OFF_SL_22-8_PR-22-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kent	Hedstrom	kent@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	OFF_SL_22-8_PR-22-8
Bruce	Hegge	manager@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	OFF_SL_22-8_PR-22-8
Sarah	Hendel	info@lismoretele.com	Lismore Cooperative Telephone Company	230 S. 3rd Ave PO Box 127 Lismore, MN 56155	Electronic Service	No	OFF_SL_22-8_PR-22-8
Pauleen	Hinkley	phinkley@rvv.net	Halstad Telephone Company	345 2nd Ave W PO Box 55 Halstad, MN 56548	Electronic Service	No	OFF_SL_22-8_PR-22-8
Cory	Hoerler	choerler@mhtele.com	Manchester Heartland	204 Railroad St Manchester, MN 56007-5012	Electronic Service	No	OFF_SL_22-8_PR-22-8
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-8_PR-22-8
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_22-8_PR-22-8
Conrad	Johnson	jtcconrad@jtc-co.net	Johnson Telephone Company	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_22-8_PR-22-8
Dwayne	Johnson	jtcbusiness@jtc-co.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_22-8_PR-22-8
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6 h St Albany, MN 56307-8322	Electronic Service	No	OFF_SL_22-8_PR-22-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carrie	Kern Taggart	cak@wiktel.com	Wikstrom Telephone Company Inc	212 South Main PO Box 217 Karlstad, MN 56732	Electronic Service	No	OFF_SL_22-8_PR-22-8
Randy	Kiesel	randy.kiesel@metronetinc.com	Metro FiberNet LLC d/b/a MetroNet	3701 Communications Way  Evansville, IN 47715	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St  Ruthton, MN 56170	Electronic Service	No	OFF_SL_22-8_PR-22-8
Patricia	Knutson	in.another.account.Pat.Knutson@Aciracoop.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Paper Service	No	OFF_SL_22-8_PR-22-8
Pat	Knutson	pat.knutson@aciracoop.net	Farmers Mutual Telephone Company	PO Box 156  Chokio, MN 56221	Electronic Service	No	OFF_SL_22-8_PR-22-8
Julie	Kolka	juliekolka@mabeltel.coop	Mabel Cooperative Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	OFF_SL_22-8_PR-22-8
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street  Lake Mills, IA 50450	Electronic Service	No	OFF_SL_22-8_PR-22-8
Tom	Lorenz	Tom.Lorenz@Aciracoop.net	Federated Telephone Cooperative	405 2nd St. E. PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Electronic Service	No	OFF_SL_22-8_PR-22-8
Al	Lundeen	alundeen@wiktel.com	Wikstrom Telephone Company	212 S Main St  Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_22-8_PR-22-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick J	Mastel	pat.mastel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_22-8_PR-22-8
Cassandra	Milligan	cassandra.miligan@tagmobile.com	TAG Mobile, LLC	701 E Plano Pkwy Ste 408 Plano, TX 75074	Electronic Service	No	OFF_SL_22-8_PR-22-8
Monty	Morrow	montymorrow@nuvera.net	Nuvera	235 Franklin St Hutchinson, MN 55350	Electronic Service	No	OFF_SL_22-8_PR-22-8
Steve	Mueller	steve.mueller@gvtel.net	Garden Valley Telephone Company db/a Garden Valley Technologies	201 Ross Ave Erskine, MN 56535	Electronic Service	No	OFF_SL_22-8_PR-22-8
Melanie	Nelson	mdnelson@rvr.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	OFF_SL_22-8_PR-22-8
Josh	Netland	jnetland@emily.net	Emily Cooperative Telephone Company	PO Box 100 40040 State Hwy 6 Emily, MN 564470100	Electronic Service	No	OFF_SL_22-8_PR-22-8
Jeffrey J.	Olson	jeffolson@rtt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	OFF_SL_22-8_PR-22-8
Chris	Olson	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebekia, MN 56477	Electronic Service	No	OFF_SL_22-8_PR-22-8
Paul	Paco Erickson	paco_erickson@mml.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_22-8_PR-22-8
Michelle	Painter	michelle.painter@sprint.com	Virgin Mobile USA, L.P.	12502 Sunrise Valley Dr Reston, VA 20196	Electronic Service	No	OFF_SL_22-8_PR-22-8

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Jack D.	Phillips	jack.phillips@fr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_22-8_PR-22-8
Ren	Preheim	ren.preheim@itccoop.com	Interstate Telecommunications Coop., Inc.	312 4 h Street West Clear Lake, SD 57226	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kristi	Putnam	kristi.putnam@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_22-8_PR-22-8
Brian	Rathman	brian.rathman@telrite.com	Telrite Corporation	2300 Windy Ridge Pkwy Ste 350S Atlanta, GA 30339	Electronic Service	No	OFF_SL_22-8_PR-22-8
Julia	Redman Carter	jrcarter@readywireless.com	Boomerang Wireless LLC	3030 Lyndon B Johnson Fwy Ste 1329 Dallas, TX 75234	Electronic Service	No	OFF_SL_22-8_PR-22-8
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-8_PR-22-8
Mark	Roach	mark@gocctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_22-8_PR-22-8
Tym	Rutkowski	Tym.Rutkowski@mossada.ms.com	Moss Adams	N/A	Electronic Service	No	OFF_SL_22-8_PR-22-8
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_22-8_PR-22-8
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_22-8_PR-22-8



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Julie	Serbus	jserbus@mnval.net	Minnesota Valley Telephone Company	PO Box 310 340 2nd Ave E Franklin, MN 55333	Electronic Service	No	OFF_SL_22-8_PR-22-8
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-8_PR-22-8
Ryan	Severson	rseverson@roseauelectric.com	Roseau Electric Coop., Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_22-8_PR-22-8
Samantha	Simatos	saman.ha.simatos@mossadans.com		601 W Riverside Avenue Spokane, WA 99201	Electronic Service	No	OFF_SL_22-8_PR-22-8
Greg	Springer	greg@gotc.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kimberly	Starr	kim@kclnterprises.net	Dunnell Telephone Company	PO Box 728 Judson, Texas 75660	Electronic Service	No	OFF_SL_22-8_PR-22-8
Tracey	Stoll	tstoll@roseauelectric.com	Roseau Electric Cooperative, Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_22-8_PR-22-8
Cynthia	Sweet	csweet@acentek.net	Ace Telephone Association	PO Box 360 207 East Cedar Houston, MN 559430360	Electronic Service	No	OFF_SL_22-8_PR-22-8
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	OFF_SL_22-8_PR-22-8
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_22-8_PR-22-8

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Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	OFF_SL_22-8_PR-22-8
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-8_PR-22-8
Melissa	Tschida	mitschida@stylekcom.com	Upsala Cooperative Telephone	PO Box 277 Upsala, MN 56384	Electronic Service	No	OFF_SL_22-8_PR-22-8
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kalsie	Vanasse	kalsiev@paulbunyan.net	Paul Bunyan Rural Telephone Coop	1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_22-8_PR-22-8
Amy	Vick	amy.vick@itccoop.com	Interstate Telecommunications Coop., Inc.	312 4 h St. W. PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_22-8_PR-22-8
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_22-8_PR-22-8
Lyle	Waughtal	lyle.waughtal@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_22-8_PR-22-8
Mark	Wegscheid	markw@broadband- mn.com	Broadband Corp.	1772 Steiger Lake Ln Victoria, MN 55386	Electronic Service	No	OFF_SL_22-8_PR-22-8
Diane	Wells	diane.wells@state.mn.us	DEED	1st National Bank Bldg 322 Minnesota St #E200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-8_PR-22-8

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Kristi	Westbrook	Kris i@goclc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401-0972	Electronic Service	No	OFF_SL_22-8_PR-22-8
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 Sou h Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_22-8_PR-22-8
Anthony	Will	anthonyw@broadband-mn.com	Broadband Corp	585 Hwy 7 W Hutchinson, MN 55350	Electronic Service	No	OFF_SL_22-8_PR-22-8
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_22-8_PR-22-8
Shane	Young	office@northern.tel	Northern Telephone Company	13448 County Road 25 Wawina, MN 55736	Electronic Service	No	OFF_SL_22-8_PR-22-8