

September 26, 2022

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. P999/PR-22-8

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

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

Sincerely,

/s/ JOY GULLIKSON
Telecommunications Analyst

/s/ DIANE DIETZ
Telecommunications Analyst

/s/ LISA GONZALEZ
Telecommunications Analyst

/s/ KYLE STRAITON
Telecommunications Analyst

/s/ ARIELLE TIAMIYU
Telecommunications Analyst

JG/DD/LG/KS/AT/ar
Attachments

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Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

ETC ANNUAL
CERTIFICATION
P999/PR-22-8

I. INTRODUCTION

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

In 2021, the Federal Communications Commission (FCC) authorized, and the Universal Service Administrative Company (USAC) distributed, \$247,614,218 to Minnesota ETCs under Commission oversight, to mitigate high costs in the provision of voice and broadband services. Under several of the high-cost schemes, companies must build out broadband networks to a set number of locations in designated census blocks.² Each year, through the required filing of FCC Form 481, companies receiving high-cost funds³ report certain information, including an affidavit that the company meets certain FCC requirements. The Minnesota Commission requires each company seeking certification to include a separate affidavit from a company officer confirming that funds are used appropriately.⁴

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

- Table 1 lists Minnesota companies receiving high-cost funds that the Commission should certify.
- Table 2 lists high-cost companies likely to be certified in another state, that serve some Minnesota customers that the Commission may wish to certify, to ensure the company is certified.
- Table 3 lists high-cost companies that the Commission should not certify. Table 3 is blank, but the heading is retained to match last year's Order in Docket 21-8.

¹ 47 CFR § 54.314 (a).

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

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

⁴ On October 24, 2018, the Minnesota Commission issued its Order in Docket P999/PR-18-8 requiring that, in future filings, an officer of each company subject to state certification file an affidavit with the Commission concurrently with the FCC Form 481 filing.

- Table 4 lists one high-cost company that does not require certification but filed information and requests that the Commission certify it.
- Table 5 lists companies whose Study Area Codes (SACs) are no longer in use, and no 481 was filed, but remain on the USAC list. The Department recommends that the Commission request USAC and the FCC remove these SACs from the certification list.
- Table 6 lists the mobile Lifeline-only ETCs that do not require Commission certification and Local Service Providers (LSPs) that are ETCs eligible for high-cost funding, but are currently providing Lifeline-only universal services

II. RELEVANT HISTORICAL BACKGROUND

A. FEDERAL LAW AND RULES

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

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

47 U.S.C. § 214 (e) (2) states:

Designation of eligible telecommunications carriers. A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1)⁵ as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

⁵ Paragraph (1) states: A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received— § 214 TITLE 47—TELECOMMUNICATIONS Page 50 (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the charges therefor using media of general distribution.

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

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

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

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

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

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

In more recent Orders, the FCC again recognized the role of the States as "primarily responsible for designating ETCs."^{6 7}

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

- The carrier is able to function in emergency situations, per §54.202(a)(2).
- The carrier's voice service rate is no more than two standard deviations above the applicable national average urban rate for voice service (currently \$54.75).⁸
- Pricing of broadband service that meets the FCC's public interest obligations is no more than the applicable benchmark to be announced annually.⁹

⁶ See FCC *Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking*. FCC 19-111, released November 14, 2019 para 28.

⁷ See FCC Order designating 56 carriers as ETCs where the carrier is not subject to the State commission's jurisdiction, WC Docket No 09-197 and 10-90, released June 8, 2021, para.4, explaining the limitations on when the FCC grants ETC designations.

⁸ See Public Notice, Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 Urban Rate Survey For Fixed Voice and Broadband Services, Posting Of Survey Data And Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers, DA 20-1409. Released November 30, 2021.

⁹ *Id.* <https://docs.fcc.gov/public/attachments/DA-20-1409A1.pdf>

- The recipient's holding company, operating companies, and affiliates' identification, and any branding.
- To the extent the recipient serves Tribal lands, documents or information demonstrating that the ETC had discussions with Tribal governments that, at a minimum, included:
 - A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
 - Feasibility and sustainability planning;
 - Marketing in a culturally sensitive manner;
 - Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
 - Compliance with Tribal business and licensing requirements.
- The results of network performance tests pursuant to the methodology and in the format determined by the Wireline Competition Bureau.¹⁰

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

- (a) **Certification.** States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to this section.

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

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

¹⁰ The network performance test methodology is behind schedule, and the FCC delayed this requirement, until this year, see Section VI.

(d) Disclose the name of the eligible telecommunications carrier on all materials describing the service.

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

On November 18, 2011, the FCC released its Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Connect America, et al. in WC Dockets No. 10-90, 07-135, 03-109, and 10-208, GN Docket No. 09-51, CC Dockets 09-92 and 96-45, and WT Docket No 10-208, which comprehensively reformed universal service and intercarrier compensation mechanisms. (Connect America Fund – Intercarrier Compensation Order or CAF-ICC Order). Among other things, the CAF-ICC Order addressed annual Section 254(e) certification by states (with respect to the ETCs they have designated). The FCC extended its current reporting requirements (previously codified in 47 C.F.R. §54.209) to all ETCs and codified the reporting requirements in new section 54.313 of its rules.

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

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

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

- 1) network outage information;
- 2) unfulfilled service requests;
- 3) number of complaints per 1,000 subscribers for voice and broadband services;
- 4) voice and broadband service rates; and
- 5) the requirement for ETCs to certify compliance with service quality standards.¹¹

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

On October 24, 2018, the Minnesota Commission issued its Order in Docket P999/PR-18-8 requiring that, in future filings, an officer of each company subject to state certification file an affidavit with the Commission concurrently with the FCC Form 481 filing. The affidavit must include:

- a. The position of the affiant.
- b. That the affiant understands and is familiar with the requirements of the FCC

¹¹ *Report and Order*. In the Matter of Connect America Fund ETC Annual Reports and Certifications. WC Docket No. 10-90, WC Docket No. 14-58. Released July 7, 2017.

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

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

In its January 30, 2020 Order, the FCC established the Rural Digital Opportunity Fund (RDOF), a grant program that will provide up to \$20.4 billion over a 10-year period to bring high-speed broadband networks to unserved and underserved areas.¹² RDOF grants will be distributed in two phases. Phase I will target census blocks that are wholly unserved by fixed voice and broadband of at least 25 Megabits per second (Mbps) download speed and 3 Mbps upload speed. Phase II will fund unserved locations within partially served census blocks.

In its December 7, 2020 Notice, the FCC announced the results of auction 904, pertaining to RDOF. The winning bidders included 24 companies selected to receive \$408,150,745.60 to deploy high-speed broadband to 142,841 assigned locations in Minnesota.¹³ Winning bidders were required to submit long-form applications to the FCC with more information regarding their qualifications and their plans to use awarded support to meet RDOF obligations.¹⁴ Additionally, by June 7, 2021, a winning bidder was required to certify and provide documentation that it was an ETC in each area for which it sought support.¹⁵ If the FCC then approved the long-form application, the applicant would be authorized to begin receiving support.

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

The Commission’s July 20, 2021 Order Establishing Best Practices and Requiring Filings directed high-

¹² See *In the Matter of Rural Digital Opportunity Fund*, WC Docket No. 19-126, Report and Order, FCC 20-5, ¶ 5 (January 30, 2020) (RDOF Order).

¹³ See *In the Matter of Rural Digital Opportunity Fund*, WC Docket No. 19-126., Public Notice, Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, DA 20-1422, ¶¶ 17, 36 (December 7, 2020) (Winning Bidder Announcement).

¹⁴ RDOF Order, ¶¶ 86–91.

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

cost ETCs to follow the Commission’s best practices regarding advertising of the Lifeline program in Docket No. P999/CI-20-747.

In its October 21, 2021 Order in Docket No. P999/PR-21-8, the Minnesota Commission directed each ETC that serves Tribal lands to file reports to memorialize its ongoing efforts to reach out to the tribe(s). These reports are due each year on the first day of January, April, July (as part of the annual filing of Form 481), and October. The plans must include: (a) the carrier’s plan to address the individual reporting requirements in form 481 from the FCC, (b) the name, position, and contact information of the person primarily responsible for tribal engagement, and (c) the ongoing duties that person will have with respect to tribal engagement.

III. OVERVIEW OF DEPARTMENT EXAMINATION

A. HIGH-COST PLANS SUBJECT TO CERTIFICATION

The FCC, through the Universal Service Access Corporation (USAC),¹⁶ disburses funds to companies through 20 different funding programs. In Minnesota in 2021, USAC disbursed \$247,614,218 from nine different programs. These funds were distributed through the following programs, ranked from most dollars distributed to least (plans with \$0 distributed in Minnesota are excluded from this list).

Plan	Abbrev.	Amount Disbursed in MN in 2021
Connect America Cost Model	CACM	\$85,622,880
Alternative Connect America Model	ACAM	66,216,232
Alternative Connect America Model II	ACAM II	57,076,714
Connect America Fund Inter-carrier Comp	ICC	17,565,816
Connect America Fund Broadband Loop		
Support	BLS	11,748,150
High-Cost Loop	HCL	4,005,780
Connect America Fund Phase II Auction	CAF II Auc	3,846,744
Rural Digital Opportunity Fund	RDOF	1,190,106
Rural Broadband Experiment	RBE	<u>341,796</u>
Total		\$247,614,218

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

B. OVERVIEW OF CERTIFICATION REVIEW

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

¹⁶ USAC distributes and manages all the universal service funds mandated by the FCC.

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

- ETC compliance with the Lifeline Best Practices established in the Commission's July 20, 2021 Order in Docket No. P999/CI-20-747. The Department filed a separate report in that docket.
- Some ETCs received RDOF funds during the years 2021 and request certification. Other ETCs started receiving funding in 2022, or have not yet received funding.
- Although not required previously due to a lack of acceptable testing mechanisms, performance testing by price cap ETCs is now required, although results are not provided as part of the FCC Form 481.
- Tribal engagement from ETCs has been of concern to the Commission. Over the past two years, the Department has worked with the ETCs serving Tribal lands to increase the quantity and quality of engagement efforts. A separate report has been filed in this docket.
- ETCs that do not have certificates of authority are not subject to the same consumer protections as other Local Service Providers (LSPs)—the Department discusses the concern.
- RDOF recipients must offer voice services in the area in which they serve, beginning on the first day of the month following the first receipt of funding, as required by the FCC. Carriers that do not have certificates of authority may not be able to resell the incumbent's voice service.
- This annual high-cost review examines the FCC Forms 481 filed by ETCs that are designated as Lifeline-only ETCs (mobile providers) as well as Local Service Providers (LSPs) that did not receive high-cost funds during 2022. No certification is required of these carriers, and no bad actors were uncovered as a result of the examination.
- The tables 1-6 list the affected companies and the Department's recommendation to certify ETCs for continued receipt of high-cost funds, or to take other action. The Department has provided the spreadsheet summarizing all the filing high-cost ETCs and the categories examined in the review process.

IV. LIFELINE COMPLIANCE OF HIGH-COST CARRIERS

The Minnesota Commission's July 20, 2021 Order in Docket No. P999/CI-20-747 established the following best practices regarding advertising of the Lifeline program for high-cost ETCs and directed high-cost carriers to comply with the best practices, to the maximum extent possible:

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

- g. Diverse and disabled population outreach;
- h. Lifeline information on all disconnection notices;
- i. Paper materials in various formats;
- j. Participate in Lifeline Awareness Week.

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

On September 6, 2022, in Docket No. P999/CI-20-747, the Department filed a report addressing the Lifeline best practices of high-cost ETCs. In that report the Department recommended some modifications to the Commission's list of Best Practices. The Department also requested, among other recommendations, that the Commission order companies to include Lifeline information in their disconnection notices.

In general, the Department found the websites addressed Lifeline services better than in previous annual certification dockets. For this Docket (22-8), the Department recommends that the Commission take no action, but instead address the provision of Lifeline service by high-cost companies in Docket 20-747.

V. HIGH-COST CARRIERS RECEIVING RDOF FUNDS

In its May 28, 2021 and June 3, 2021 Orders in Docket No. P999/CI-20-86 and company specific dockets, the Minnesota Commission approved petitions for the following carriers seeking ETC designation in certain census blocks for the purpose of receiving RDOF grants and required additional compliance filings:

StarLink Services, LLC,
AMG Tech. Investment Group, LLC, dba NextLink
Arrowhead Electric Cooperative
Cooperative Wikstrom Telephone Company
CTC, Roseau Electric Cooperative
Farmers Mutual Telephone Company
Halstad Telephone Cooperative
Winnebago Cooperative Telecom Association,
Red River Rural Tel. Assoc. dba Red River Comm.
Interstate Telecommunications Cooperative, Inc.
LTD Broadband, LLC.

Savage Communications, Inc.
Cable One VoIP, LLC
Paul Bunyan Rural Telephone
Consolidated Telephone Company dba
Gardonville Cooperative Tel. Assoc.
Federated Telephone Cooperative,
Garden Valley Telephone Cooperative,
Midcontinent Communications,
CenturyLink Communications, LLC
Windstream Communications, LLC

Some of these carriers were previously designated as high-cost ETCs for the purposes of receiving funds from high-cost programs prior to their RDOF application.¹⁷

¹⁷ On August 10, 2022 the FCC announced that it was rejecting the long-form applications of LTD Broadband and StarLink, to receive support through the Rural Digital Opportunity Fund program. The FCC "determined that these applications failed to demonstrate that the providers could deliver the promised service. See <https://docs.fcc.gov/public/attachments/DOC-386140A1.pdf>

The following carriers received RDOF funds during the calendar year 2021:

Midcontinent Communications	Federated Telephone Cooperative
Paul Bunyan Rural Telephone Cooperative	Farmers Mutual Telephone Company
Winnebago Cooperative Telephone Association	Garden Valley Telephone Company
Consolidated Telephone Company	Roseau Electric Cooperative
Arrowhead Electric Cooperative	Savage Communications.

Additional high-cost ETCs have begun receiving RDOF funds during the calendar year 2022, the certification of these additional carriers will not be necessary until the Minnesota Commission's 2023 annual certification docket opens. As a result, those ETCs designated to receive RDOF grants in the Commission's May 28, 2021 and June 3, 2021 Orders, and not receiving RDOF funds or funds from other high-cost programs during the year 2021, will not need to be certified by the Minnesota Commission in the current docket. However, Gardonville Cooperative Telephone Company, listed on Table 4, has requested that it be certified via a letter from the Commission to the FCC.¹⁸ Gardonville filed a 481 form in the current docket but received no high-cost funds during the calendar year 2021. Gardonville's SAC is not on USAC's list of carriers needing certification this year, however it was awarded an RDOF grant by the FCC in the year 2021. There is no harm in granting certification to the SAC on Table 4, for Gardonville, if the Commission chooses to do so.

VI. PERFORMANCE MEASUREMENTS TESTING

A. BACKGROUND AND HISTORY OF PERFORMANCE MEASUREMENTS TESTING

In 2011, the FCC announced that recipients of high-cost universal service support would be required to test broadband networks and report the results to ensure compliance with speed and latency metrics.¹⁹ Results, reported to USAC, would be subject to audit. The FCC implemented Performance Measurements (PM) testing to support the goal of bringing a similar internet experience to both rural areas and urban environments.

The USF/ICC Transformation Order established guidelines for ETCs related to what, when, and how they should test broadband networks they deployed with high-cost support. The FCC also laid out reporting requirements and basics of compliance. After changes in funding sources, advances in technology, and comments from the industry, the FCC released subsequent Orders to clarify and update PM testing requirements for high-cost support recipients.²⁰

This year, for the first time, results of PM testing are available from price cap carriers. Companies must file results of testing for deployed CAF Phase II locations. Carriers file results with the Performance Measures Module, rather than the FCC Form 481.

¹⁸ Via a September 12, 2022 email message from Tom Campbell of Olsen-Thielen Co. to the Department (not included, but available on request).

¹⁹ WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17705-06, para. 109 (2011) (*USF/ICC Transformation Order*).

²⁰ See WC Docket No. 10-90, Order, 33 FCC Rcd 6509 (WCB/WTB/OET 2018) Order DA 18-710, released and adopted on July 6, 2018 (*Performance Measures Order*) and In the Matter of Connect America Fund, WC Docket No. 10-90, Order on Reconsideration, Adopted Oct. 25, 2019, FCC 19-104.

B. CURRENT REQUIREMENTS

PM testing is intended to ensure that networks funded with high-cost dollars can meet speed and latency requirements. Established standards aim to bring a similar experience to both rural and urban areas and to monitor companies that promise to deploy networks that will meet the established standards.²¹ Speed and latency standards demand that subscribers have sufficient connectivity to use real-time applications, including VoIP.²² To meet the PM requirements established by the FCC, high-cost recipients must adhere to and report compliance with the following:

- Speed: At least 80 percent of network speed measurements must be at 80 percent of required speeds (the “80/80 Standard”)²³
- Latency: Round trip packet travel must be at 100 milliseconds (ms) or less (the standard for high-latency carriers, such as satellite providers awarded under CAF Phase II, is 95% of packets must travel round trip at 750 ms or less).

To perform PM testing, ETCs may use one of three approaches:

1. The Measuring Broadband America (MBA) infrastructure, in which various entities manage testing for the FCC;
2. Existing tools that are available from the private sector and which the FCC has approved; or
3. Develop their own self-testing software.

The process of testing also requires high-cost ETCs to follow specific requirements put into place to obtain results that accurately and consistently reflect how their deployed networks serve subscribers, including²⁴ but not limited to:

- Locations tested must be from **active subscriber locations** that are randomly assigned through USAC to a remote test server located at, or reached by passing through, and FCC-designated internet exchange point (IXP).²⁵
- Carriers must perform at least one download and one upload test during each testing hour at each testing location.
- PM testing must be performed at each speed tier offered in each state where that speed tier is offered and where high-cost support funds deployment.
- Testing must occur between 6 p.m. and 12 a.m., including weekends.

²¹ “[W]e find that requiring ETCs to submit verifiable test results to USAC and the relevant state commissions will strengthen the ability of this Commission and the states to ensure that ETCs that receive universal service funding are providing at least the minimum broadband speeds, and thereby using support for its intended purpose as required by section 254(e).” (USF/ICC Transformation Order and FNPRM), para 110.

²² Id. at para 96.

²³ The test consists of a single measure of download or upload speed of 10 to 15 seconds duration between the consumer testing location and a specific remote server. See Performance Measures Order at para 18.

²⁴ There are waivers and exceptions available for some of these and other requirements when an ETC cannot accommodate. For example, very small ISPs may not have 5 subscribers in a state within each service tier.

²⁵ ETCs report what locations to which they have completed deployment and USAC’s Performance Measure Module (PMM) uses the information to randomly assign locations to be tested. The testing locations are reassigned after two years of testing.

- All speed tests must occur in the same week; all latency tests must occur in the same week, but speed testing and latency testing can occur in different weeks.
- If an ETC performs more than the minimum number of required tests at one location, it must report the results of all tests.
- Larger carriers test up to 50 locations while small carriers may test as few as 5 locations.

“Pre-testing” vs. “Testing”

The FCC and USAC have created a “Pre-testing” period for each fund to allow ETCs the opportunity to correct testing process anomalies and make network corrections needed to comply with standards. Pre-testing also involves randomly selected, active subscriber locations and results must be certified and reported. If ETCs don’t meet speed and latency requirements, they will not lose access to support during pre-testing, but if ETCs do not report PM pre-testing results, they will be subject to withholding.

Reporting

Testing and reporting schedules are dictated by the milestone calendar associated with each high-cost fund. Price-cap carriers began pre-testing January 1, 2020, and testing July 1, 2020. Test results were due in July 2022. CAF II Auction pre-testing began January 1, 2022, and official testing is scheduled to begin on January 1, 2023. Results must be reported by July 2024.²⁶

Compliance

The FCC considers a company’s ability to achieve speed and latency standards a necessary component of meeting deployment commitments. ETCs have one year to address performance shortcomings (the “pre-testing” period) before the FCC withholds support. The level of high-cost support withheld is commensurate with the level of noncompliance.²⁷

Results from Price-cap Carriers Serving Minnesota

The Department identified four price-cap carriers required to implement PM testing and report results to USAC this July: CenturyLink, Frontier, Windstream, and Consolidated. None of the identified ETC reported testing results with their 481 filings submitted to the Commission. The Department requested the results of PM testing from each company, and except for CenturyLink²⁸, all promptly cooperated. Responses indicated none were penalized for failure to report results or for inability to meet performance standards.

- CenturyLink, which used a third-party platform for testing, provided PM testing results from Q1 – Q4 of 2021. Except for Q3 2021, the company achieved 100% compliance. Within Q3, CenturyLink obtained 94% Level 1 compliance, which could have resulted in 5% support withheld.

²⁶ For the calendar of all program testing, see <https://www.usac.org/high-cost/annual-requirements/performance-measures-testing/>.

²⁷ See *Performance Measures Order*.

²⁸ CenturyLink eventually responded with the reporting data after follow-up from Department Staff. The company did not provide the information in its initial response to the information request on the matter.

- Consolidated, which used the MBA method, provided testing results from Q1 – Q4 of 2021. The company achieved 100% compliance.
- Frontier, which worked with a vendor to develop its own testing method, stated that its 2020 pre-testing data was not available from USAC. The company provided PM testing results from Q1 – Q4 2021, indicating 100% compliance with speed and latency requirements.
- Windstream Lakedale, which developed its own testing method, provided Q2 – Q4 2020 of pre-testing and Q1 – Q4 2021 PM testing. Pre-testing showed the network needed improvement, and testing results indicated that the improvements had been made; Windstream Lakedale achieved 100% PM testing compliance.

C. THE COMMISSION SHOULD REQUIRE ETCs TO FILE PM TESTING RESULTS AS PART OF ANNUAL 481 FILINGS

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

"We will require recipients of funding to test their broadband networks for compliance with speed and latency metrics and certify to and report the results to the Universal Service Administrative Company (USAC) on an annual basis. These results will be subject to audit. In addition, as part of the federal-state partnership for universal service, we expect and encourage states to assist us in monitoring and compliance and **therefore require funding recipients to send a copy of their annual broadband performance report to the relevant state or Tribal government.**"²⁹

Congress determined that state commissions act as efficient gatekeepers to guard against waste, fraud, and abuse of high-cost funding.³⁰ As such, the Commission may use all available tools to determine that ETCs use funding to meet the goal of universal service. The best forum to receive and review PM testing results for compliance is the annual 481 filings.

Moreover, sharing PM testing results is not burdensome for ETCs. Companies must collect and report the data for USAC and can easily share the same information with the Department and Commission. Three ETCs submitted PM testing results this year promptly; CenturyLink initially resisted providing the information.³¹ Providing information to the state that companies are already required to produce for submission to USAC is not an excessive burden to ETCs.

The Department recommends that the Commission order CAF II and RDOF funding recipients to submit PM testing results with all future 481 filings.

²⁹ See *USF/ICC Transformation Order and FNPRM*, para 109.

³⁰ See *USF/ICC Transformation Order and FNPRM*, para. 573.

³¹ CenturyLink initially responded that the information would be available to download from USAC.

VII. TRIBAL ENGAGEMENT

The Minnesota Commission's Order of October 21, 2021³² requires ETCs serving Tribal lands to file quarterly updates with the PUC, explaining their ongoing efforts to reach out to and engage with the tribe(s) they serve. Through these quarterly updates and through meetings directly with the companies, the Department has been reviewing the efforts of each company as they address the requests of the Tribes. In general, the engagement between ETCs and Tribes has increased and ETCs have been taking strides to make services and benefits more accessible. The Department's Tribal Liaison, Lorna LaGue, helped to improve communications between ETCs and Tribes, questions were answered, and several issues were resolved. The untimely death of the Department's Tribal Liaison, Lorna LaGue, is a significant loss for the Department, but the Department expects progress to continue and encourages the ETCs serving tribes to expand the availability of benefits and services. A separate report summarizing the efforts of the ETCs will be filed with the Commission.

Of note among providers are the efforts of Paul Bunyan Rural Telephone Company (PBRTC). PBRTC has made demonstrable efforts to engage with and heed requests of the Tribes it serves, specifically by conducting "sign up" events, where PBRTC representatives were on-site at Tribal community centers, to explain the ACP and assist customers with the application process. Representatives visited the Red Lake Nation on two occasions and recently sent representatives to Leech Lake. In these examples, PBRTC has reported that in-person visits have been successful as existing customers added benefits to their accounts and new benefit-eligible households signed up for service.

The Department recommends that the Commission continue to require quarterly filings of Tribal engagement from the ETCs for the foreseeable future.

VIII. CONSUMER PROTECTIONS REQUIREMENTS FOR HIGH-COST CARRIERS NOT HOLDING CERTIFICATES OF AUTHORITY FROM THE MINNESOTA COMMISSION

A. ETCs WITHOUT CERTIFICATES OF AUTHORITY ARE NOT REQUIRED TO ADHERE TO THE SAME LEVEL OF CONSUMER PROTECTIONS AS OTHER ETCs.

As stated above in Section II,³³ the Commission has jurisdiction to designate and certify ETCs. Three RDOF and CAF II awardees without Certificates of Authority from the Commission received ETC designation and filed 481 forms this year. Minnesota Chapter 237 generally does not apply to non-certificated ETCs except where the Commission has made specific regulations concerning such companies.

³² 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-21-8, Order Certifying Eligible Telecommunications Carrier's Use of Federal High-Cost Subsidy, October 21, 2021

³³ *Supra*, Section II, See also *In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant Winners*, Docket No. P999/CI-21-86, Docket opened Feb. 2, 2021. See the Department Comments, March 26, 2021, pp. 3-7, for a detailed discussion on PUC jurisdiction over ETCs as determined by state and federal rules.

In Docket P999/CI-21-86, the Department recommended that the Commission implement six specific consumer protections for non-certificated ETCs.³⁴ The Commission has not yet considered the recommendations offered by parties in Docket P999/CI-21-86.

The six consumer protections the Department recommended were, in brief:

1. Disruption of 911 service reported;
2. 911 Plan approved by DPS;
3. Resolve service outages promptly;
4. Prices and terms available to customers;
5. ETC shall provide information about the Consumer Affairs Office (CAO); and
6. Customers shall not be on hold an excessive amount of time.³⁵

B. THE DEPARTMENT USED AVAILABLE RESOURCES TO EXAMINE NON-CERTIFICATED ETCs' RECENT PERFORMANCE OF CONSUMER RELATED ACTIVITY.

The three ETCs without Certificates of Authority sought certification in the current docket with 481 filings:

- Broadband Corporation (CAF II)
- LTD Broadband, LLC (CAFII)
- Savage Communications (RDOF)

The Department reviewed each company's 481 filings and websites to determine if the ETCs would be compliant with consumer protections recommended in Docket P999/CI-21-86. Staff also contacted DPS to obtain information about existing or pending 911 plans.

C. NON-CERTIFICATED ETCs COULD IMPROVE CONSUMER PROTECTIONS

PUBLIC SAFETY: Disruption of 911 service reported (recommendation #1) and 911 plan approved (recommendation #2)

Broadband Corporation, LTD Broadband, and Savage Communications each submitted initial 911 plans, but these plans have not apparently been fully vetted by the DPS.

The Department and the Office of Attorney General received several complaints from LTD subscribers about lengthy broadband outages in the fall of 2021. Subscribers contacting the Department were not associated with locations deployed with high-cost funding, but spoke of widespread, repetitive outages that lasted weeks or months in some cases.³⁶ Any outage indicates a potential lack of access to 911 service for subscribers. To the Department's knowledge, LTD did not report any 911 service interruptions to any state agency.

³⁴ See Comments of the Minnesota Department of Commerce in response to PUC Notice of Comment Period, issued June 30, 2021, In the Matter of a Notice to Rural Digital Opportunity Fund Grant Winners, Docket No: P999/CI-21-86pp. 10 - 21 Doc. No. 202111-180026-01.

³⁵ More detail about each of the six recommendations can be found in Attachment A of Reply Comments from the Department, Docket No. P999/CI-21-86, Dec. 20, 2021, Doc. No. 202112-180858-01.

³⁶ See, for example: → LTD Broadband outage or down - All errors & problems in real time (downhunter.com) and Frustrations with outages at LTD Broadband might send red flag to federal funders | Blandin on Broadband

CUSTOMER SERVICE EXPECTATIONS: Resolve service outages promptly (Recommendation #3).

The FCC does not require ETCs to report outages on form 481 and no state Administrative Rule requires non-certificated ETCs to report outages to the Commission, as is the case when significant outages affect certificated ETCs.³⁷ Anecdotal information from customers does not provide comprehensive reporting and may apply to locations beyond the scope of high-cost funding, but offers insight into an ETC's performance.

No subscribers from Broadband Corporation or Savage Communications contacted the Department to report outages during the past year.³⁸ LTD's fall 2021 outage prompted subscribers in the Austin area to contact the Department and the Office of the Attorney General. Consumers reported outages lasting up to four weeks and reported difficulties reaching customer service representatives for information on repairs. Without a Certificate of Authority, LTD customers did not enjoy the same consumer protections as neighbors who receive broadband and voice service from certificated ETCs.³⁹

TRANSPARENT RATES ONLINE AND EXPLICIT TERMS FOR NEW SUBSCRIBERS: Prices and terms available to customers (Recommendation #4)

Without opening a new subscriber account, Department Staff were unable to determine if the three non-certificated ETCs explicitly described contract terms and conditions to new subscribers. 47 C.F.R. 54.201 (d)(2) requires ETCs to "[a]dvertise the availability of such services and the charges therefore using media of general distribution."⁴⁰ Without tariffs or price lists on file to refer to, the Department had only the web pages of the non-certificated carriers as a source of rates, terms and conditions of service.

Broadband Corporation, one of the non-certificated carriers, does not provide pricing on its website but includes a coverage locator along with the statement "Click to find a plan available in your area." The Department experimented with the locator to find a pricing plan, but was instead prompted to call for rates for service at a specific address. References to rates are brief and conflicting, depending on the web page.⁴¹

³⁷ Minn. Rule 7810.0600 Report to Commission on Service Disruption.

³⁸ The Enforcement Division at the Department of Commerce receives and addresses consumer complaints across many regulated industries. Telecommunications complaints are not listed as a complaint type handled by the Enforcement Division.

³⁹ 7810.5800 Interruptions of Service. "... The minimum objective should be to clear 95 percent of all out-of-service troubles within 24 hours of the time such troubles are reported. ... Every telephone utility shall inform the commission, as soon as possible, of any major catastrophe such as that caused by fire, flood, violent wind storms, or other acts of God which apparently will result in prolonged and serious interruption of service to a large number of customers."

⁴⁰ See 47 CFR 54.201(d)(2) "A common carrier designated as an eligible telecommunications carrier under this section shall be eligible to receive universal service support in accordance with section 254 of the Act and... shall throughout the service area for which the designation is received:(2) Advertise the availability of such services and the charges therefore using media of general distribution."

⁴¹ E.g. on the Main page ("Plans starting at just \$20 a month!") and the Products & Services page ("...with plans starting at just \$35 a month"). See <https://broadband-mn.com/> and <https://broadband-mn.com/products-services/>.

LTD Broadband, another non-certificated carrier, lists packages and prices on its website, but all references include the “starting at” prefix.⁴² The Department was able to contact a Customer Service Representative (CSR) but only after providing a name, phone number, and email address. The CSR could not answer a basic question about rates, said he would follow up on the request for information, but would not confirm whether the follow up would occur via email, phone, or text.

Savage Communications, the third non-certificated carrier, provided downloadable pricelists entitled “channel lineups” for all its service areas. The channel lineup .pdfs provided detailed information on prices for bundles, internet access, and voice service. Savage also provided installation fees and similar charges typically included in terms and conditions of a tariff. Savage Communications offered a chat option and the CSR provided honest and quick information to how to access the pricelists.

With respect to transparency on low-income assistance programs, the September 6, 2022 report filed by the Department in Docket No. P999/CI-20-747 addresses the Lifeline best practices of all high-cost ETCs, including the not-certificated carriers. Most notably, none of the three non-certificated companies provided searchable websites and Lifeline information was not prominent.

CUSTOMER RELATIONS: ETC shall provide information about the Consumer Affairs Office (CAO) (Recommendation #5) and Customers shall not be on hold an excessive amount of time (Recommendation #6)

Recommendation #5 suggested that non-certificated ETCs be required to provide information about the PUC’s Consumer Affairs Office (CAO) upon enrollment, when signing up a new subscriber. The Department is unaware of any notification is provided by non-certified providers of the CAO, nor is the Department aware that these same entities are responsive to CAO with any consumer complaints that may be raised. In the absence of a PUC requirement, there is no transparency on whether customers are provided information about CAO on enrollment or, if customers are aware of CAO, whether non-certificated entities will fully cooperate with the CAO.

Recommendation #6 simply seeks to have some reasonableness with respect to the amount of time customer’s wait on-hold when calling for assistance. The Department learns of complaint hold times when either subscribers or another entity bring their concerns to our attention. Although certificated ETCs are subject to Minn. Rule 7810.5200 Answering Time,⁴³ customers of non-certificated ETCs have no recourse under Commission’s rules.

⁴² Links appear to be broken as when hovering over each listing, they appear to be links to more information but clicking does not take the user to another page.

⁴³ 7810.5200 Answering Time. Adequate forces shall be provided at local manual offices in order to assure that 95 percent of the calls will be answered within ten seconds. Ninety percent of repair service calls, calls to the business office, and other calls shall be answered within 20 seconds. An “answer” shall mean that the operator or representative is ready to render assistance and/or ready to accept information necessary to process the call. An acknowledgment that the customer is waiting on the line shall not constitute an answer.

No customer complaints about hold times have come to the Department about service from Savage Communications or Broadband Corporation; neither is the Department aware of such complaints to any other entity. However, during LTD's fall 2021 outage customers complained to the Department about hold times, some stating that they were on hold for hours and that long hold times were always typical when they called for assistance. In the absence of transparency, the Department's lack of awareness should not be interpreted as "no problem exists."

D. RECOMMENDATION

With respect to the six consumer protections and the three non-certificated ETCs, the Department recommends that the Commission consider these matters in Docket No. 21-86.

IX. REQUIREMENT THAT RDOF RECIPIENTS OFFER VOICE SERVICE

FCC Order 20-05, known as the RDOF Order, established voice service requirements for providers receiving RDOF support. The Order states:

[T]he new provider receiving Rural Digital Opportunity Fund support should be prepared to provide voice service throughout its service areas, either through its own facilities or a combination of its own and other ETC's facilities, on the first day of that month.⁴⁴

The Department sent questions to the FCC asking:

1. If a price cap carrier is relieved of its federal high-cost ETC obligation, but continues to offer voice service in the area where a new provider is receiving RDOF support, is the new provider required to offer voice service in that area?
2. If the answer to question 1 is "no", does the "be prepared to" language require the new provider receiving RDOF support to provide voice service only when the price cap carrier stops providing voice service?
3. Is there any requirement for a new provider receiving RDOF support to provide voice service, prior to when it deploys broadband, in non-price cap areas?

The response from the FCC was:

1. We [the FCC] expect the RDOF recipient to offer and advertise voice, if requested, the first day of the month following its authorization to receive support, which it can do through resale. But we want the RDOF recipient to be responsible for billing and customer service. The reason for this is that the supported service is voice.

⁴⁴ See In the Matter of Rural Digital Opportunity Fund, WC Docket No. 19-126, Report and Order, FCC 20-5, ¶ 5 (January 30, 2020) (RDOF Order), paragraph 139.

2. Note that before the price cap carrier can stop providing voice service, it must be granted a discontinuance under section 214 of the Commission's rules, and it also may need permission under state rules.
3. An RDOF recipient is required to offer voice service, if requested, throughout its service area, which could include non-price-cap areas.⁴⁵

The FCC response makes clear that all RDOF recipients must be prepared to offer voice services throughout their winning bid areas on the first day of the month following its authorization to receive support, whether or not they are prepared to concurrently offer broadband services. For carriers without certificates of authority from this Commission, it is likely that the only way to offer voice services is through the resale of voice by another ETC, which would be the incumbent telephone company. To resell the incumbent telephone company's services, an entity must have a certificate of authority to offer CLEC services, pursuant to Minn. Stat. 237.16, subd 1. and Minn. R. 7812.0600.

It is likely that RDOF recipients are unaware of this conundrum. The Department recommends that the Commission require all RDOF recipients without certificate of authority to demonstrate the manner in which they are offering voice service throughout their territory to comply with the FCC RDOF Order, or if support is not yet being received, how they will offer voice service on the first day of the month following its authorization to receive support. Voice service may be through VoIP, but if internet is not yet available to the locations where RDOF funds are used for deployment, the RDOF recipient without a certificate of authority will need to explain how the provision of VoIP is possible at the RDOF funded locations. If an RDOF recipient without a certificate of authority intends to resell service of a telecommunications carrier with a certificate of authority in Minnesota, then an application for authority as a CLEC reseller is required.

X. ETCS OFFERING LIFELINE-ONLY BENEFITS

A. THE DEPARTMENT EXAMINED CARRIERS OFFERING ONLY LIFELINE SERVICE BECAUSE THEY ARE REQUIRED TO FILE FORM 481 WITH STATE COMMISSIONS

Fourteen Mobile Wireless Lifeline-only carriers provided Lifeline benefits to Minnesota customers during the calendar year 2021. These carriers provided Lifeline credits of approximately \$5,832,900 during the calendar year 2021. Of the 14 carriers, Q Link Wireless was the largest provider of wireless Lifeline to Minnesota customers with \$3,238,437 in credits provided in 2021. The following is a breakdown of the Lifeline benefits provided by Wireless Lifeline-only carriers during the year 2021:

	SAC	Carrier	Lifeline Credits for the Year 2021⁴⁶
1	369024	Q LINK WIRELESS	\$3,238,437
2	369018	ASSURANCE WIRELESS	760,786
3	369036	NORTH AMERICAN LOCAL LLC	462,445

⁴⁵ The email with the Department's questions and the FCC's response is provided in Attachment B.

⁴⁶ <https://opendata.usac.org/Lifeline/Lifeline-Disbursements-Tool/rink-mije> .

4	369032	TRACFONE WIRELESS, LLC DBA SAFELINK WIRELESS	434,385
		TELRITE CORPORATION DBA LIFE WIRELESS DBA	
5	369016	ACCESS WIRELESS	359,264
		SAGE TELECOM COMMUNICATIONS LLC DBA	
6	369034	TRUCONNECT	297,850
7	369025	BOOMERANG WIRELESS DBA ENTOUCH WIRELESS	170,353
8	369023	I-WIRELESS	55,572
		GLOBAL CONNECTIONS INC OF AMERICA DBA	
9	369022	STANDUP WIRELESS	26,938
10	369014	T-MOBILE CENTRAL LLC	11,340
11	369017	TERRACOM WIRELESS	6,636
12	369028	TAG MOBILE, LLC	3,507
13	369033	TEMPO TELECOM, LLC	3,046
		AMERICAN BROADBAND AND TELECOMMUNICATIONS	
14	369030	COMPANY DBA AMERICAN ASSISTANCE	2,341
		total	\$5,832,900

Under 47 CFR 54.422, part (c), carriers are required to file FCC Forms 555 and 481 with state Commissions, because state Commissions provide oversight in ensuring the ongoing success of the Lifeline program.⁴⁷

During the 2021 calendar year most wireless Lifeline-only carriers saw a downward trend in Lifeline subscribership. Of the Lifeline-only carriers operating in Minnesota during the year 2021, only three carriers provide Lifeline benefits to consumers located on tribal lands (i.e., Boomerang dba enTouch Wireless, North American Local LLC, and SafeLink Wireless).

B. REVIEW OF LIFELINE-ONLY CARRIERS.

The Department conducted a website review for each carrier to ensure the Lifeline-only carriers were in compliance with the rule, in 47 CFR 54.405(b), requiring that Lifeline providers publicize the availability of the Lifeline program in a manner reasonably designed to reach individuals likely to qualify for the service. The Department reviewed carrier websites to ensure operable links to the USAC National Verifier webpage, assisting customers seeking Lifeline benefits. The Department also reviewed carrier websites to ensure that information provided regarding eligibility for Lifeline was in compliance with rule 47 CFR § 54.409 income qualifications. It is the intent of the Department to communicate any concerns with websites and outreach directly with the carriers. If concerns identified cannot be satisfactorily resolved, the Department will file comments with the Commission to address those concerns.

⁴⁷ All carriers offering Lifeline support are required to file FCC Forms 555 and 481 including incumbent local exchange carriers, ETCs receiving high-cost support, and wireless Lifeline-only carriers.

XI. SUMMARY OF DEPARTMENT RECOMMENDATIONS

A. TABLES ATTACHED TO DEPARTMENT COMMENTS

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

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

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

Table 3 has been reserved for high cost ETCs where there is a recommendation against certification by the Department. The Department is not recommending denial of certification for any carriers, so Table 3 is blank.

Table 4 lists a Minnesota high cost ETC for which the Commission has no action item, but the carrier has requested that the Commission certify the company. The ETC filed a 481 form in the current docket but received no high-cost funding during the calendar year 2021 and is not on USAC's list of carriers needing certification this year.⁴⁸

Table 5 lists carriers who, along with their associated SACs, are no longer operational, but whose SACs are still listed in certain USAC spreadsheets. The Department recommends that the Commission write to USAC requesting that the carriers listed in Table 5 be removed from USAC's list of high-cost carriers.

Table 6 lists carriers who are non-high-cost ETCs that do not receive high-cost support and do not require certification. These carriers have Lifeline-only designation and offered Lifeline benefits to Minnesota customers during the calendar year 2021. In addition to Mobile Wireless Lifeline-only carriers, there are two LSPs: Citizens Frontier Minnesota, and Frontier Minnesota, that are ETCs eligible for high-cost funding, but not currently receiving such funding. These two ETCs received \$27,562,715 in Lifeline funding in 2021.

B. RECOMMENDATIONS

The Department recommends that the Commission take the following actions:

1. Certify the ETCs listed in Table 1.
2. Certify the ETCs listed in Table 2.
3. Certify the ETC listed in Table 4 by including the SACs in a letter to the FCC.

⁴⁸ This request was made by Tom Campbell of Olsen, Thielen and Co. in his September 12, 2022, email to the Department.

4. Request the FCC to have USAC remove the carriers listed in Table 5 from its list of ETCs to be certified.
5. Take no action on the ETC provision of Lifeline Services, as those issues are to be addressed in Docket P999/CI-20-747.
6. Require that ETCs provide the results of Performance Measurements as part of the annual filings of FCC Form 481.
7. Address the continuing filing of quarterly reports on Tribal engagement efforts for those ETCs serving Tribal lands when the Commission considers the full report of the Department on this matter.
8. Consider consumer protections for ETCs without Certificates of Authority in Docket P999/CI-21-86.
9. Within 30 days of the Commission's order in this matter, require all RDOF recipients without certificate of authority to demonstrate the manner in which they are offering voice service throughout their territory to comply with the FCC RDOF Order, or if support is not yet being received, how they will offer voice service on the first day of the month following its authorization to receive support.

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

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

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

Table 1 Minnesota High Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (YIN)
1	361346	ACE TEL ASSN-MN	MN	ILEC	y
2	361347	ALBANY MUTUAL ASSN	MN	ILEC	y
3	361374	ARROWHEAD COM CORP	MN	ILEC	y
4	361350	ARVIGTELCO	MN	ILEC	y
5	369051	ARROWHEAD ELECTRIC COOPERATIVE	MN	CLEC	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
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

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 1 Minnesota High Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (YIN)
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	361395	GARDEN VALLEY TEL CO	MN	ILEC	y
35	369039	GARDEN VALLEY TELEPHONE COMPANY	MN	CETC	y
36	361396	GARDONVILLECOOPTEL	MN	ILEC	y
37	361399	GRANADA TEL CO	MN	ILEC	y
38	361401	HALSTAD TEL CO	MN	ILEC	y
39	369020	FARMERS MUTUAL TELEPHONE COMPANY	MN	CETC	y
40	361367	FRONTIER MN	MN	ILEC	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
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

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 1 Minnesota High Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (YIN)
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 COMPANY dba RED RIVER	MN	ILEC	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		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	ILEC	y
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

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 1 Minnesota High Cost ETCs that the Commission Should Certify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	Certification (YIN)
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	ILEC	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

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

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

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

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

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 4 Minnesota High Cost ETCs not requiring certification, but filing information			
No.	SAC	Carrier Name	Certification (YIN)
1	369053	GARDONVILLE COOP TEL	<i>Requested, but not included on USAC list, so requires a letter</i>

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 5 Carriers on USAC high-cost list, who are no longer operational and whose SACs no longer exist. The Minnesota PUC should write to FCC requesting that these carriers be removed from USAC's list of high-cost carriers.				
No.	SAC	Carrier Name	Certifying State	Certification (YIN)
1	361357	BLACKDUCK TEL CO	MN	N
2	361437	MINNESOTA LAKE TEL	MN	N
3	366110	LAKE COUNTY d/b/a LAKE CONNECTIONS ¹	MN	N
4	369003	HOMETOWN SOLUTIONS	MN	N

¹ 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). The Universal Service Administrative Company has continued that it will remove Lake County from future Minnesota certification lists but is unable to do so for the current certification list.

**2022 Eligible Telecommunications Carriers for Certification
by the Minnesota Public Utilities Commission**

Table 6A Wireless ETCs that do not receive high-cost support and do not require certification				
No.	SAC	Carrier Name	Certifying State	Certification (YIN)
1	369016	TELRITE CORPORATION DBA LIFE WIRELESS	MN	N/A
2	369032	TRACFONE WIRELESS, LLC	MN	N ²
3	369023	I-WIRELESS	MN	N/A
4	369024	Q LINK WIRELESS	MN	N/A
5	369025	BOOMERANG WIRELESS	MN	N/A
6	369028	TAG MOBILE, LLC	MN	N/A
7	369033	TEMPO TELECOM, LLC	MN	N/A
8	369018	ASSURANCE WIRELESS USA LP	MN	N/A
9	369030	AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY	MN	N/A
10	369036	NORTH AMERICAN LOCAL LLC	MN	N/A
11	369022	GLOBAL CONNECTIONS INC OF AMERICA DBA STANDUP WIRELESS	MN	N/A
12	369017	TERRACOM WIRELESS	MN	N/A
13	369014	T-MOBILE CENTRAL LLC ³	MN	N
14	369034	SAGE TELECOM COMMUNICATIONS LLC DBA TRUCONNECT	MN	N/A
Table 6B Wireline ETC SACs that do not receive high cost support and do not require certification				
No.	SAC	Carrier Name	Certifying State	Certification (YIN)
1	369021	FEDERATED TELEPHONE COOPERATIVE	MN	N/A
2	369049	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE	MN	N/A
3	369050	GARDEN VALLEY TELEPHONE COMPANY	MN	N/A
4	369914	CONSOLIDATED TELEPHONE COMPANY	MN	N/A

² TracFone Wireless and T-Mobile are the only companies in Table 6A that appear in the USAC MN Certification list.

³ The Commission approved T-Mobile's request to relinquish its High-Cost Program ETC status effective December 31, 2020. *In the Matter of the Petition of T-Mobile Central LLC for Relinquishment of its High-Cost Status as an Eligible Telecommunications Carrier (ETC)*, P-6856/M-20-894, ORDER at 1 (Feb. 23, 2021).

From: [Gayle Teicher](#)
To: [Doyle, Greg \(COMM\)](#); [Brad \(James\) Ramsay \(jramsay@naruc.org\)](#); [Emmitt Carlton](#)
Cc: [Theodore Marcus](#); [Gonzalez, Lisa \(COMM\)](#); [Gullikson, Joy \(COMM\)](#); [Michelle Jones](#); [Yvette Cage](#); [Gayle Teicher](#)
Subject: RE: [EXTERNAL]: RDOF voice requirement
Date: Wednesday, August 17, 2022 12:38:21 PM
Attachments: [image001.png](#)
[image002.png](#)

Greg,

Thanks for reaching out and for your patience. After coordinating internally, there is no objection to attaching the email exchange.

Best,

Gayle

Gayle Radley Teicher
Senior Attorney, Office of Intergovernmental Affairs
Consumer and Governmental Affairs Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554
202 418-1515
gayle.teicher@fcc.gov

From: Gayle Teicher <Gayle.Teicher@fcc.gov>
Sent: Thursday, August 4, 2022 2:13 PM
To: Doyle, Greg (COMM) <greg.doyle@state.mn.us>; 'jramsay@naruc.org' <jramsay@naruc.org>
Cc: Gonzalez, Lisa (COMM) <Lisa.Gonzalez@state.mn.us>; Gullikson, Joy (COMM) <joy.gullikson@state.mn.us>; Emmitt Carlton <Emmitt.Carlton@fcc.gov>; Theodore Marcus <Theodore.Marcus@fcc.gov>; Michelle Jones <Michelle.Jones@fcc.gov>; Yvette Cage <Yvette.Cage@fcc.gov>; Gayle Teicher <Gayle.Teicher@fcc.gov>
Subject: RE: [EXTERNAL]: RDOF voice requirement

Greg

Thanks for reaching out. We will coordinate internally and get back to you on this as soon as we can.

Best

Gayle

Gayle Radley Teicher
Senior Attorney, Office of Intergovernmental Affairs
Consumer and Governmental Affairs Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554
202 418-1515

gayle.teicher@fcc.gov

From: Doyle, Greg (COMM) <greg.doyle@state.mn.us>
Sent: Thursday, August 4, 2022 3:10 PM
To: Gayle Teicher <Gayle.Teicher@fcc.gov>; 'jramsay@naruc.org' <jramsay@naruc.org>
Cc: Gonzalez, Lisa (COMM) <Lisa.Gonzalez@state.mn.us>; Gullikson, Joy (COMM) <joy.gullikson@state.mn.us>; Emmitt Carlton <Emmitt.Carlton@fcc.gov>; Theodore Marcus <Theodore.Marcus@fcc.gov>; Michelle Jones <Michelle.Jones@fcc.gov>
Subject: RE: [EXTERNAL]: RDOF voice requirement

Gayle, we would like to attach the below email exchange to public comments being filed with the Minnesota Public Utilities Commission. Is that ok?

Greg Doyle
Manager, Telecommunications
651-539-1875
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101



From: Gayle Teicher <Gayle.Teicher@fcc.gov>
Sent: Wednesday, July 13, 2022 12:40 PM
To: Doyle, Greg (COMM) <greg.doyle@state.mn.us>; 'jramsay@naruc.org' <jramsay@naruc.org>
Cc: Gonzalez, Lisa (COMM) <Lisa.Gonzalez@state.mn.us>; Gullikson, Joy (COMM) <joy.gullikson@state.mn.us>; Emmitt Carlton <Emmitt.Carlton@fcc.gov>; Theodore Marcus <Theodore.Marcus@fcc.gov>; Michelle Jones <Michelle.Jones@fcc.gov>; Gayle Teicher <Gayle.Teicher@fcc.gov>
Subject: RE: [EXTERNAL]: RDOF voice requirement

Doyle

In reference to the questions you posed, please see the following responses.

1. We expect the RDOF recipient to offer and advertise voice, if requested, the first day of the month following its authorization to receive support, which it can do through resale. But we want the RDOF recipient to be responsible for billing and customer service. The reason for this is that the supported service is voice.
2. Note that before the price cap carrier can stop providing voice service, it must be granted a discontinuance under section 214 of the Commission's rules, and it also may need permission

under state rules.

3. An RDOF recipient is required to offer voice service, if requested, throughout its service area, which could include non-price cap areas.

Please let us know if we can be of further assistance.

Regards,

Gayle

Gayle Radley Teicher
Senior Attorney, Office of Intergovernmental Affairs
Consumer and Governmental Affairs Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554
202 418-1515
gayle.teicher@fcc.gov

From: Doyle, Greg (COMM) <greg.doyle@state.mn.us>
Sent: Friday, July 8, 2022 1:55 PM
To: Gayle Teicher <Gayle.Teicher@fcc.gov>; 'jramsay@naruc.org' <jramsay@naruc.org>
Cc: Gonzalez, Lisa (COMM) <Lisa.Gonzalez@state.mn.us>; Gullikson, Joy (COMM) <joy.gullikson@state.mn.us>; Emmitt Carlton <Emmitt.Carlton@fcc.gov>
Subject: RE: [EXTERNAL]: RDOF voice requirement

Super. Thank you.

Greg Doyle
Manager, Telecommunications
651-539-1875
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101



From: Gayle Teicher <Gayle.Teicher@fcc.gov>
Sent: Friday, July 8, 2022 12:54 PM
To: Doyle, Greg (COMM) <greg.doyle@state.mn.us>; 'jramsay@naruc.org' <jramsay@naruc.org>

Cc: Gonzalez, Lisa (COMM) <Lisa.Gonzalez@state.mn.us>; Gullikson, Joy (COMM) <joy.gullikson@state.mn.us>; Gayle Teicher <Gayle.Teicher@fcc.gov>; Emmitt Carlton <Emmitt.Carlton@fcc.gov>
Subject: RE: [EXTERNAL]: RDOF voice requirement

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Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Greg and Brad

Thank you for your inquiry. We reached out internally and will be back to you once we hear back.

Thanks very much.

Gayle

*Gayle Radley Teicher
Senior Attorney, Office of Intergovernmental Affairs
Consumer and Governmental Affairs Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554
202 418-1515
gayle.teicher@fcc.gov*

From: Doyle, Greg (COMM) <greg.doyle@state.mn.us>
Sent: Friday, July 8, 2022 10:04 AM
To: Gayle Teicher <Gayle.Teicher@fcc.gov>; 'jramsay@naruc.org' <jramsay@naruc.org>
Cc: Gonzalez, Lisa (COMM) <Lisa.Gonzalez@state.mn.us>; Gullikson, Joy (COMM) <joy.gullikson@state.mn.us>
Subject: [EXTERNAL]: RDOF voice requirement

CAUTION: This email originated from outside of the Federal Communications Commission. Do not click on links or open attachments unless you recognize the sender and trust the content to be safe. If you suspect this is a phishing attempt, please use the 'Report Message' feature in Microsoft Outlook or forward the email to the NSOC.

Gayle and Brad,

There is some language in the attached RDOF Order that we are hoping you can help us understand. We want to understand the timing of when a new provider receiving RDOF support is required to offer stand-alone voice service in the areas in which it is receiving support. The language that states "be prepared to" is causing us confusion.

Our questions:

1. If a price cap carrier is relieved of its federal high-cost ETC obligation, but continues to offer voice service in the area where a new provider is receiving RDOF support, is the new provider required to offer voice service in that area?
2. If the answer to question 1 is “no”, does the “be prepared to” language require the new provider receiving RDOF support to provide voice service only when the price cap carrier stops providing voice service?
3. Is there any requirement for a new provider receiving RDOF support to provide voice service, prior to when it deploys broadband, in non-price cap areas?

139. Finally, we clarify the specific timing to the grant of limited forbearance to incumbent price cap carriers that are replaced by a new provider. First, we find that these carriers will be relieved of their federal high-cost ETC obligation to offer voice telephony in specific census blocks on the first day of the month after a new ETC is authorized to receive Rural Digital Opportunity Fund support in those blocks. Thus, the new provider receiving Rural Digital Opportunity Fund support should be prepared to provide voice service throughout its service areas, either through its own facilities or a combination of its own and other ETC’s facilities, on the first day of that month. Price cap carriers electing to receive a seventh year of model-based support will maintain their obligation to provide both voice and broadband service throughout 2021, as explained above. These carriers will be relieved of their federal high-cost ETC obligation to offer voice telephony in specific census blocks on January 1, 2022, regardless of when a new ETC is authorized to receive Rural Digital Opportunity Fund support. Finally, incumbent price cap carriers that decline a seventh year of model-based support will be relieved of the federal high-cost ETC obligation to offer voice telephony on the first day of the month after a new Rural Digital Opportunity Fund support recipient is authorized to receive support.

Greg Doyle

Manager, Telecommunications

651-539-1875

mn.gov/commerce

Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101



CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. P999/PR-22-8

Dated this **26th** day of **September 2022**

/s/Sharon Ferguson

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@iwirelesshome.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..	312 4th 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@bevcomm.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	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
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	mpucnotices@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
David	Bickett	dave.bickett@parkregion.com	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@polartel.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 Sebek, MN 56477	Electronic Service	No	OFF_SL_22-8_PR-22-8
Thomas	Burns	tgburns@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 Attorneys	commerce.attorneys@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	tcrews@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	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212	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
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@polartel.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@rrv.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
Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Assoc	PO Box 304 308 Frontage Rd Sebeka, MN 56477	Electronic Service	No	OFF_SL_22-8_PR-22-8
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@interstatetelcom.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 AvePO Box 127 Lismore, MN 56155	Electronic Service	No	OFF_SL_22-8_PR-22-8
Pauleen	Hinkley	phinkley@rrv.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
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
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
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
Conrad	Johnson	jtconrad@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
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th 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@wikel.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 Ruthon, 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@wikel.com	Wikstrom Telephone Company	212 S Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_22-8_PR-22-8

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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.milligan@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 d/b/a Garden Valley Technologies	201 Ross Ave Erskine, MN 56535	Electronic Service	No	OFF_SL_22-8_PR-22-8
Melanie	Nelson	mdnelson@rrv.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
Chris	Olson	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	OFF_SL_22-8_PR-22-8
Jeffrey J.	Olson	jeffolson@rrt.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
Paul	Paco Erickson	paco_erickson@mmi.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@ftr.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 4th 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@goctc.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@mossadams.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 7th 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	samantha.simatos@mossadams.com		601 W Riverside Avenue Spokane, WA 99201	Electronic Service	No	OFF_SL_22-8_PR-22-8
Greg	Springer	greg@gocctc.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@kclenterprises.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	mtschida@sytekcom.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 4th 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	Westbrock	Kristi@goctc.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 South 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