



Savage Communications Inc.
115 Tobies Mill Place
P.O. Box 810
Hinckley, MN 55037

October 3, 2022

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

Re: Docket No. P999/PR-22-8 Annual Certifications Related to Eligible Telecommunications (“ETCs”) Use of Federal Universal Service Support Reply Comments

Dear Mr. Seuffert:

Savage Communications, Inc. (herein referred to as “SCI”) submits these reply comments under Docket 22-8 in response to the Minnesota Department of Commerce (“DOC”) comments filed on September 26th, 2022, specifically in the following areas: VIII & IX.

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

C. NON-CERTIFICATED ETCs COULD IMPROVE CONSUMER PROTECTIONS

SCI was identified by the DOC as already providing much of the consumer protections requested by the DOC on a voluntary basis. To-date, SCI is unaware of any consumer complaints for any of the protections proposed.

“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.”

Identified as a shortfall, SCI submits that on December 31, 2021, as part of the Lifeline Docket No. P999/PR-20-747, SCI submitted supplement narrative regarding requirements on Lifeline Advertising and Best Practices. In this filing SCI provided best practice information and website links that were in effect at year-end 2021. SCI confirmed that the website links provided in the filing are still active today and a consumer has access to the information within the recommended number of clicks (filing provided as Attachment A).

SCI requests the Commission not carve out specific rules for a small group of ETCs without properly considering the appropriate level of consumer protections so that they are not



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redundant with existing Federal rules and regulatory oversight that have been discussed in Docket P999/CI-21-86.

IX. REQUIREMENT THAT RDOF RECIPIENTS OFFER VOICE SERVICE

“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.”

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.

SCI is aware of their voice service obligation as part of their commitment to service RDOF-awarded areas. As part of their FCC Long-Form Application and Public Notice of Award, SCI received the approval of the FCC to offer a VoIP solution to meet the voice obligation. SCI is required to certify annually their compliance with the obligations of the RDOF award and has completed this as part of the 481 filing process. SCI does not intend to resell a service of the incumbent telecommunication carrier throughout any RDOF-awarded service area, therefore would not be required to request authority as a CLEC within the State of MN.

Please contact me at mike@scicable.net or by phone at 320-384-7442 x717 with any questions concerning this filing.

Sincerely,
Michael R. Danielson
Vice President of Operations
Attachment

ATTACHMENT A



Savage Communications Inc.
115 Tobies Mill Place
P.O. Box 810
Hinckley, MN 55037

December 31, 2021

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

Re: Supplement Narrative to Annual Certification Related to Eligible
Telecommunications Carriers' Use of the Federal Universal Service Support Reporting
Requirements on Lifeline advertising and Best Practices, Dk No, 20-747

Dear Mr. Seuffert:

Savage Communications, Inc (herein referred to as "SCI") submits this supplement filing in Docket No. P999/PR-20-747 for the additional Information requested in the Minnesota Public Utilities Commission August 2, 2021 Notice of Lifeline Outreach Filing Requirement for High Cost ETCs.

SCI lists the following current outreach methods or plans to implement moving forward for advertising lifeline services and outreach best practices as determined by the Commission:

- Provide a website that meets the following criteria: provides lifeline information within three clicks, searchable key words, periodic functionality checks, all plan information is displayed and provide continual updates:
 - SCI's website allows users to obtain lifeline information within two clicks.
 - Functionality checks and updates will be completed quarterly.
- Use social media accounts to advertise the lifeline program
 - SCI will plan to post information on lifeline in the new year.
- Keep in regular contact with local social agencies that can offer information to their clients
 - SCI is working toward outreach to local schools, food shelves, libraries and churches providing lifeline information.
- Designate one employee to act as a Lifeline Champion well versed in the Lifeline program or train all customer service representatives on lifeline to assist customers with questions or issues concerning the lifeline program:



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- SCI will train all of its customer service representatives on the lifeline program.
- Perform community outreach through various means:
 - SCI is working towards promoting the lifeline program at community events in the next year.
- Engage in outreach to tribal governments in its service area:
 - SCI has on going communications with a tribal government in its service area.
- Engage in outreach towards diverse populations with disabilities, including translating lifeline advertising into language other than English and using the telecommunications relay services, text telephone and speech to speech services:
 - SCI will work to include these practices in the new year. SCI will have copies of the Lifeline application in its office in English and Spanish.
- Provide Lifeline information on all disconnect notices:
 - SCI will work towards adding lifeline information on its disconnect notices for the new year.
- Provide lifeline information in paper materials in various formats:
 - SCI will have paper lifeline application forms in English and Spanish in its office.
- Participate in Lifeline awareness week:
 - SCI is making plans to participate in lifeline awareness week in 2022 which is the third week in September.

Included are screen shots of the lifeline information available from SCI's website.

Please contact me at mike@scicable.net or by phone at 320-384-7442 x717 with any questions concerning this filing.


Sincerely,

Michael R. Danielson

Vice President of Operations

Attachment

Screen Shots of Lifeline Information on SCI Broadband's Website:



As an SCI Broadband subscriber, you can bundle SCI Digital Phone Unlimited with your other services to save on your monthly bill. You'll have the convenience of one bill, one payment and one number to call for customer service and 24/7 technical support. Plus, you'll enjoy the same local service and quality you've come to expect from SCI Broadband. If you're ready to talk savings, visit our packages page for pricing and availability.


[Pricing](#)

PHONE SERVICE ASSISTANCE

Here to help

SCI Broadband offers assistance programs for broadband internet and landline telephone subscribers, including federally- and state-funded discounts for qualified low-income individuals and tribal residents, and accessibility programs for the deaf, hard-of-hearing and speech impaired.

[Learn more](#)



Lifeline Program

Lifeline is a federally-funded discount on broadband internet service or landline telephone service for qualified residents. Lifeline recipients will be automatically enrolled in the TAP program as required by Minnesota law and applicable Commission Orders.

Apply for Lifeline

- [Click here for English](#)
- [Haga clic aquí Español](#)

Minnesota Telephone Assistance Plan

The Minnesota Telephone Assistance Plan (TAP) program is a state-funded monthly discount on landline telephone service for qualified residents. **Lifeline recipients will be automatically enrolled in the TAP program.** [Click here](#) to apply.

Additional benefits are available to persons living on Tribal lands or reservations.

[Click here](#) for more information about telephone discounts.

Telephone Equipment Distribution Program

[Click here](#) for more information about telephone accessibility programs.