

Staff Briefing Papers

Meeting Date	October 13, 2022	Agenda Item 1*
Company	Local Exchange Carriers, Eligible Telecommunications Carriers	
Docket No.	P999/PR-22-8	
	In the Matter of Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of the Federal Universal Service Support Required Pursuant to C.F.R. 54.313	
Issue(s)	Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314?	
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Relevant Documents

Date

Comments of the Office of the Attorney General Residential Utilities Division	September 26, 2022
Comments of the Minnesota Department of Commerce	September 26, 2022
Comments of the Minnesota Department of Commerce – Spreadsheet – 481 Compliance	September 26, 2022
Tribal Engagement Report – Department of Commerce	September 29, 2022
Joint reply comments - Office of the Attorney General Residential Utilities Division and Department of Commerce	October 3, 2022
Reply comments of Savage Communications, Inc. (SCI)	October 3, 2022

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

I. Statement of the Issues

1. Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314?

II. Background

In this proceeding, the Minnesota Public Utilities Commission (Commission) is asked to certify 105 ETCs and another seven ETCs (which could be certified by another state Commission) after review of each Company's FCC Form 481.

Under the Federal Telecommunications Act of 1996, telecommunications carriers must be designated "eligible telecommunication carriers" (ETCs) to qualify for subsidies from the federal Universal Service Fund for serving high-cost areas or low-income consumers.¹ State regulatory commissions have primary responsibility for designating ETCs, although the Federal Communications Commission (FCC) acts on designation requests from carriers who are not subject to state commission jurisdiction.

The Commission has an ongoing proceeding in Docket No. P999/CI-21-86 regarding the Commission's jurisdiction to oversee ETCs' compliance as set forth in sections 214(e)(2) and 254(f) of the Communications Act of 1934, as amended, the FCC's Universal Service rules, codified at 47 C.F.R. section 54, and the applicable FCC auction materials. P999/CI-21-86 does not impact the Commission's consideration of the current annual ETC recertifications.

Each year, the Commission and all state commissions must certify that ETCs receiving High-Cost Funds are using the funds received in the previous year (2021) and will use the funds in the coming year (2023), only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Since 2001, States have filed annual certification of FCC Form 481 compliance filings by ETCs regarding high-cost program support from the Universal Service Fund (USF). All companies filing FCC Form 481 under 47 C.F.R. 54.313 are normally certified via the Universal Service Administrative Company (USAC) electronic certification roster and by being sent hardcopy to the FCC by USPS as per federal practice. The Commission does this under authority delegated in 47 C.F.R. 54.314. Wireless companies filing FCC Form 481 under 47 C.F.R. 54.422 do so for the Commission's information only. Those wireless companies are appropriately not listed on the USAC verification system and not certified by the Commission to the FCC.

In 2021, the USAC distributed **\$247,614,218** to Minnesota ETCs to mitigate high costs in the provision of voice and broadband services from nine different High-Cost Program funds. Under

¹ [47 U.S.C. § 214\(e\)\(1\).](#)

these high-cost programs, companies must build out to several locations in given census blocks. Each year, through the required filing of FCC Form 481, companies receiving high-cost funds 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.

Comments on the ETC filings were filed on September 26, 2022 by the Minnesota Office of the Attorney General Residential Utilities Division (OAG or OAG-RUD) and the Minnesota Department of Commerce (DOC or Department).

III. Parties' Comments

- 1. Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314? and 2. In the event a high cost ETC has not filed an executed affidavit, should the Commission require an executed affidavit be filed as a replacement?**

Department

Several high-cost ETCs have begun receiving Rural Development Opportunity Funds (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.² As such, 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 of the Department's September 26, 2022 comments, has requested that it be certified via a letter from the Commission to the FCC. Gardonville filed a 481 form in the current docket but received no high-cost funds during the calendar year 2021. Gardonville's Study Area Code (SAC) is not on USAC's list of carriers needing certification this year; 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.³

² These carriers include 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, and Savage Communications.

³ Please see Department September 26, 2022, Comments at p. 10.

Tables Attached to the Department Comments⁴

Attached to the Department's comments are six tables, the first five of which follow 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. The Department recommends that the Commission certify the ETCs listed in Table 1.

Table 2 lists the High Cost ETCs that will be certified by other states but could also be certified by the Minnesota Commission. The Department recommends that the Commission certify the ETCs listed in Table 2.

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. 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. The Department recommends that the Commission certify the ETC listed (Gardonville, SAC # 369053) in Table 4 by including the SACs in a letter to the FCC.

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. The Department recommends that the Commission request the FCC direct USAC to remove the carriers listed in Table 5 from its list of ETCs to be certified.

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.

OAG

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

- Certify all 105 Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A.

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Please see Department September 26, 2022, Comments at Attachment A pp. i-viii.

- Certify some or all of the High Cost ETCs listed in Table 2 of OAG Attachment A.⁵

Department and OAG Joint Reply

For Table 5, the OAG and the Department jointly recommend that the Commission provide USAC with a list of the carriers (including their SACs) that should be removed from future Minnesota High Cost annual certification lists so that USAC can look into them further.

2. Should the Commission order CAF II and RDOF funding recipients to submit Performance Measure (PM) Testing results with all future 481 filings?

Department

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. Speed and latency standards demand that subscribers have sufficient connectivity to use real-time applications, including Voice over Internet Protocol (VoIP). To meet the PM requirements established by the FCC, High Cost ETCs 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”)
- 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).⁶

For further details regarding PM testing, please pages 11-14 of the Department September 26, 2022 comments.

The Department believes that 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. 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.⁷

⁵ Please see OAG September 26, 2022, Comments Attachment A at pp. 1-5.

⁶ Please see Department September 26, 2022, Comments at p. 11.

⁷ Please see Department September 26, 2022, Comments at p. 13.

OAG

The FCC's rules require High Cost ETCs to provide the results of their performance measures testing as part of the annual certification process. Not all of the High-Cost ETCs currently make their performance measures testing results available to the Commission. Consequently, the PM testing results are not available for the OAG and the Department to review as part of the annual certification process.

Because the FCC's rules require certain High Cost ETCs to include PM testing results with their annual FCC Forms 481, the Commission should require the applicable High Cost ETCs to include their PM testing results with the annual FCC Forms 481 that they file with the Commission beginning with the filing year in which their testing results are due..⁸

3. Should the Commission continue to require quarterly filings of Tribal engagement from the ETCs for the foreseeable future?

Department

The Department provided the following company summaries regarding tribal engagement:

1. Arrowhead Electric Coop. Inc. (AEC)

AEC appears to be meeting the needs and requests of the Grand Portage Band of Chippewa/Lake Superior Tribe. It appears that the relationship between this provider and the Tribe it serves has been one of open dialogue and AEC shows a willingness to meet the requests of the Tribe.

2. Arvig (Arrowhead Communications Corporation, Callaway Telephone Company, East Ottertail Telephone Company, The Peoples Telephone Company of Bigfork, Twin Valley-Ulen Telephone Company)

Arvig continues to meet the requirements set forth in 47 C.F.R. § 54.313(a)(5), though it has discussed issues with unresponsiveness from some Tribes. Arvig is aware of the desires of the Tribes which have responded to outreach efforts and has been willing to seek pragmatic solutions to the issues and requests presented. Arvig has expressly stated it has a desire to work together with the Tribes it serves.

3. Frontier Minnesota (Frontier)

Frontier is no-longer a recipient of high-cost support, and it appears to have no obligation to comply with 47 C.F.R. § 54.313(a)(5). However, Frontier remains involved in discussions regarding tribal engagement. Frontier's willingness to engage in these conversations reflects a general desire to be attentive to the needs of its customers who reside on tribal lands.

⁸ Please see OAG September 26, 2022, Comments at p. 9.

4. Garden Valley Telephone Company (GVTC)

GVTC's quarterly reports demonstrate that its representatives understand and show a willingness to meet the requirements set forth in 47 C.F.R. § 54.313(a)(5). GVTC has met virtually with the Department on several occasions and has expressed a willingness and enthusiasm to build stronger working relationships with the Tribes it serves.

5. Johnson Telephone Company (JTC)

JTC has open dialogue with the Leech Lake Band of Ojibwe (LLBO) and has shown a willingness to meet the requests of the Tribe. However, JTC has noted that permitting applications are processed slowly and only 10 of 36 customers who are eligible for Lifeline receive the discount. JTC has noted that this may be because customers apply the credit to a wireless service. JTC had discussions with LLBO regarding this low participation and plans to participate in ACP in the third quarter of this year.

6. Lumen (CenturyLink, CenturyTel of MN, CenturyTel of NW WI, Embarq, Qwest)

CenturyLink has shown a willingness to discuss tribal needs and requests but expressed hesitation to permit Tribes to own facilities. While CenturyLink's outreach is slightly impersonal and belated, its points of contact have been willing to discuss concerns raised by the Department. CenturyLink appears willing to hold discussions with Tribes regarding needs and requests but has not yet addressed some issues raised by the Department.

7. Nuvera Communications, Inc. (Scott-Rice Telephone Company)

Nuvera has a strong relationship with the Shakopee Mdewakanton Sioux Community and appears to satisfy the requests and needs of the Tribe as they arise. The Department has found no issues with Nuvera's services as it appears they have met and continue to address the requests they receive.

8. Paul Bunyan Rural Telephone Cooperative (PBRTC)

One issue that PBRTC highlighted was its concern that the Affordable Connectivity Program (ACP) is not well known. It believes that there are many eligible customers who are unaware that they are eligible or unaware of the program entirely. To address this issue, PBRTC has been working directly with its Tribal contacts, continues to make its Tribal Engagement contact person available, and has held onsite sign-up days for the ACP, which were advertised in advance.

9. Savage Communications, Inc. (SCI)

SCI has regular contact with the Mille Lacs Band of Ojibwe but expressed a desire for greater communication and for requests to be addressed more quickly.⁹

10. Wikstrom Telephone Company (Wikstrom)

Wikstrom has been attentive to the requests by the Department regarding Tribal engagement. Wikstrom has shown a willingness to listen to the requests of the Tribe.

The Department recommends in its September 29, 2022, Tribal Engagement Report that the Commission:

- a. Adopt the Best Practices Recommendations for Tribal Engagement, presented in Attachment 1 of the September 29, 2022, Tribal Engagement Report.
- b. Continue requiring quarterly updates on Tribal Engagement Practices. Quarterly updates for January, April, July, and October should be submitted under the docket number for the current year. For example, filings for January of 2023 shall be filed under 23-8.
- c. Order that each annual filing, beginning with 23-8, include a narrative of how the ETC comports with the Best Practices Recommendations for Tribal Engagement.¹⁰

OAG

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

4. How should the Commission address the issue of 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 raised by the Department of Commerce?

Department

In their September 26th comments, the Department raised the issue 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, regardless of whether they are prepared to concurrently offer broadband services.

The Department believes for carriers without certificates of authority from this Commission, it

⁹ Please see Department September 29, 2022, Tribal Engagement Report at pp. 12-20.

¹⁰ Please see Department September 29, 2022, Tribal Engagement Report at p. 21.

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.

The Department recommends that the Commission require all RDOF recipients without certificate of authority to demonstrate the way 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.¹¹

OAG

Did not comment on this issue.

SCI Broadband

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.¹²

IV. Staff Analysis

For Minnesota High-Cost Program ETCs to be eligible for support, the Commission must file an annual certification with the FCC and USAC by October 31st of each year certifying that High-Cost Program funds were used in the previous year, and will be used in the coming year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. If the Commission submits its certification after October 31st of this calendar year, the Minnesota High-Cost Program ETCs may incur funding reductions.¹³

¹¹ Please see Department September 26, 2022, Comments at p. 19.

¹² Please see SCI Broadband's October 3, 2022, reply comments at p. 2.

¹³ The FCC Form 481 was not approved and available from the United States Office of Management and Budget (OMB) until July 11, 2022. The schedule was pushed back for filing of the 481 Forms to July 29, 2022, from the normal July 1st. As such, the balance of the schedule was delayed by approximately four weeks. Typically, the Commission must file an annual certification with the FCC and USAC by October 1st of each year certifying that High-Cost Program funds were used appropriately in the previous year and the prior year. This year, the FCC has extended the Commission's certification deadline to October 31, 2022.

In so far as this annual review is a ministerial duty delegated to the Commission by the FCC, Staff concurs that each of the 112 companies requesting certification appear to have met the filing requirements. Please see Tables 1, 2 and 4 of Attachment A of the OAG's September 26, 2022, comments and as indicated on Attachment A Tables 1, 2, and 4 of the Department's September 26, 2022, comments or Table 1, 2, and 4 of Attachment A of this document for the list of ETCs requiring Commission certification.¹⁴

Regarding the Department's proposal to require that ETCs provide the results of Performance Measurements (PM) as part of their annual filings of FCC Form 481, Staff suggests that the Commission ask the parties to clarify this matter at the meeting. Staff notes that the issue is not so much an issue of regulatory burden, but one of being a necessary and reasonable requirement given the nature of the PM data.

With respect to Lifeline and Tribal engagement, Staff notes that no party raised concerns regarding the Departments proposals. However, Staff notes that over time circumstances regarding the relationship between the Tribes and the carriers may change. These changes may reduce the continued relevance of these reports. As such, it would be prudent for the Commission to annually review the efficacy of continuing both the quarterly and annual filings.

Finally, in their September 26th comments, the Department raised the issue 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, regardless of whether they are prepared to concurrently offer broadband services. The targets for the Department are VoIP providers who are not required to possess a certificate of authority from the Commission.

Originally, there were five such carriers that received RDOF ETC designation from the Commission in 2021: LTD Broadband, Starlink, Cable One, NextLink, and Savage Communications (SCI Broadband or SCI).¹⁵ Pending any appeal or reconsideration by the FCC, there are two of these VoIP providers that currently remain active in the process. The two are SCI and NextLink.

¹⁴ Attachment A of the Staff briefing document was prepared by the Department of Commerce.

¹⁵ Of these five ETC designated by the Commission, three of the carriers will either not be actively providing service under RDOF or the ultimate provision will be severely delayed. LTD Broadband had its RDOF long-form application rejected by the FCC and is currently involved in a Commission proceeding (PT7102, E6741, P6995/M-22-221) to revoke its RDOF ETC designation. StarLink had its RDOF long-form application rejected by the FCC. In docket P-7055/RL-22-143, Cable One was allowed to voluntarily relinquish its ETC designation after Cable One was informed on July 26, 2021, by the FCC that there were census blocks that the FCC had concerns about the efficacy of providing additional universal service funds. On August 16, 2021, Cable One informed the FCC that it would no longer pursue RDOF support in the census blocks identified by the FCC and that it would conduct an additional review of the other census blocks that were the subject of its RDOF award.

SCI is scheduled to receive \$6,090,479.10 in support for 4,541 locations in 492 census blocks in Minnesota over a 10-year period. NextLink is scheduled to receive \$3,736,316.00 in support for 1,408 locations in 384 census blocks in Minnesota over a 10-year period.

SCI provided its response in this docket. NextLink has not responded. Given the limited time involved in developing this docket, the Commission may wish to defer action, not take any action on this issue, or request that Nextlink respond in a manner like that of SCI.¹⁶

Decision Options

Does the Commission have sufficient documentation through the filed FCC Form 481 to be assured that the high-cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314?

1. Recertify all companies as indicated in Tables 1, 2, and 4 of Attachment A of the staff briefing papers (*Department, OAG, ETCs*). And
2. Provide USAC with a list of carriers (including their SACs) that should be removed from future Minnesota High-Cost annual certification lists so that USAC can look into them further as provided in Table 5 of Attachment A of the staff briefing papers. (*Department, OAG, ETCs*). or
3. Recertify all companies as indicated in Tables 1, 2, and 4 of Attachment A of the staff briefing papers except for the following, which shall not be recertified: [*specify any ETCs that are not being recertified*].

Should the Commission order CAF II and RDOF funding recipients to submit Performance Measure (PM) Testing results with all future 481 filings?

4. Do not require CAF II and RDOF funding recipients to submit Performance Measure (PM) Testing results with all future 481 filings. or
5. Require CAF II and RDOF funding recipients to submit Performance Measure (PM) Testing results with all future 481 filings (*Department and OAG*).

Should the Commission adopt the Department's proposed Best Practices for Tribal Engagement and continue to require quarterly filings of Tribal engagement from the ETCs for the foreseeable future?

6. Continue requiring quarterly updates on Tribal Engagement Practices. Quarterly updates for January, April, July, and October shall be submitted under the docket number for the

¹⁶ Please see SCI Broadband's October 3, 2022, reply comments at p. 2.

current year. For example, filings for January of 2023 shall be filed under 23-8. (Department) and

7. Adopt the Best Practices Recommendations for Tribal Engagement, as presented in Attachment 1 of the Department's September 29, 2022, Report. (Department) and
8. Order that each annual filing, beginning with 23-8, include a narrative of how the ETC comports with the Best Practices Recommendations for Tribal Engagement. (Department) and
9. Annually evaluate the continued efficacy of requiring all such filings.

How should the Commission address the issue of 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 raised by the Department of Commerce?

10. Within 30 days of the Commission's Order in this matter, require that Nextlink—in a manner similar to SCI's October 3, 2022 reply comments—describe how it will offer voice services throughout its winning bid areas on the first day of the month following its authorization to receive support. or
11. Within 30 days of the Commission's order in this matter, require all RDOF recipients without a certificate of authority to demonstrate the way 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. (Department)

**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

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

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

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

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

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

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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>

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Table 5 Carriers on USAC high-cost list, who are no longer operational and whose SACs no longer exist. The Minnesota PUC should write to FCC requesting that these carriers be removed from USAC's list of high-cost carriers.				
No.	SAC	Carrier Name	Certifying State	Certification (YIN)
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.