

September 28, 2022

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

**RE: Tribal Engagement Report of the Minnesota Department of Commerce**  
Docket No. P999/PR-22-8

Dear Mr. Seuffert:

Attached is the Tribal Engagement Report of the Minnesota Department of Commerce. This Report outlines the recent history and present status of the relationships between high-cost Eligible Telecommunications Carriers and the Tribes they serve. This report also provides Best Practices Recommendations for Tribal Engagement for the Commission's consideration.

Sincerely,

/s/ KYLE STRAITON  
Telecommunications Analyst

/s/ JOY GULLIKSON  
Telecommunications Analyst

KS/JG/ja  
Attachment



## Minnesota Tribal Engagement Report Telecommunications Unit

09/28/2022

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In Memoriam  
**Lorna LaGue**

October 21, 1964- August 22, 2022

The Department of Commerce would like to dedicate this Tribal Engagement Report in recognition of the life and contributions of Lorna LaGue, its Tribal Liaison. Lorna passed away during the completion of this Report. Lorna's passionate service made a strong and positive impact on the Department, her coworkers, and the State's relationships with Native American Tribes. Her work included contributions to this Tribal Engagement Report.

Lorna will be sincerely missed as a colleague, expert, and friend.

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## ***I. Introduction***

This report outlines the recent history and present status of the relationships between high-cost Eligible Telecommunications Carriers (“ETC”) and the tribe(s) they serve as observed by the Minnesota Department of Commerce (“Department” or “Commerce”). In Minnesota, there are 11 federally recognized Indian Tribes.<sup>1</sup> Federally recognized Indian Tribes have an inherent right to operate their own governmental systems and are sovereign nations.<sup>2</sup> The Federal Communications Commission (“FCC”) requires ETCs that receive high-cost funds and serve on tribal lands to file an annual report demonstrating that the ETC has actively held conversations with each tribal government they serve.<sup>3</sup> The requirement for engagement falls on the provider and not on the tribe. The Minnesota Public Utilities Commission’s (“Commission”) Order of October 21, 2021<sup>4</sup> requires these ETCs to file quarterly updates with the Commission, explaining their ongoing efforts to reach out to and engage with the tribe(s) they serve. Through these quarterly updates and in meetings with the companies, the Department has been reviewing and encouraging the efforts of each company. Tribal Engagement requirements are described in 47 C.F.R. § 54.313(a)(5) and states that providers must demonstrate they have engaged in discussions with tribes that, at a minimum, included the following:

- i. A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- ii. Feasibility and sustainability planning;
- iii. Marketing services in a culturally sensitive manner;
- iv. Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- v. Compliance with Tribal business and licensing requirements. Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services to the Tribes, Tribal members, or Tribal lands. These include certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government licensure.

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<sup>1</sup> Minnesota Indian Tribes, [mn.gov/porta/government/tribal/mn-indian-tribes](https://mn.gov/porta/government/tribal/mn-indian-tribes), 2022

<sup>2</sup> The Indian Self-determination and Education Assistance Act of 1975, as amended (25 U.S.C. 450 et seq.) and the Tribal Self-Governance Act of 1994 (25 U.S.C. 458aa et seq.)

<sup>3</sup> 47 C.F.R. § 54.313(a)(5)

<sup>4</sup> “Annual reporting requirements for High-cost recipients,” Code of Federal Regulations, Title 47 (2020), Chapter I, Subchapter B, Part 54.313, <https://www.ecfr.gov/current/title-47/chapter-I/subchapter-B/part-54>

<sup>4</sup> 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

## ***II. Recent History of Tribal Engagement Efforts***

### ***a. FCC Comments About Meaningful Outreach***

On October 21, 2019, the FCC issued a Public Notice seeking comments regarding Tribal Engagement. Tribes had expressed concern that the existing engagement process was lacking and wanted more effective collaboration between tribal governments and the ETCs serving them.<sup>5</sup> The FCC noted that providers found it difficult to maintain up-to-date contact lists for tribal leaders or members who could discuss the needs of the tribes. ETCs stated that keeping lists up to date was especially difficult as representatives change, often hold multiple roles, and tribes may have different titles for their employees and those employees' roles.<sup>6</sup> This concern is shared by Commerce, tribes, and ETCs operating in Minnesota. This issue is compounded by the fact that many providers' outreach attempts go unanswered. The provider may reach the right person but not receive a response or request from the tribe. As the requirement for engagement falls on providers and not on tribes, providers need to be diligent in maintaining appropriate points of contact.

The FCC recommended that tribal governments assess the goals, needs, and priorities of their tribe, and keep the FCC updated by identifying opportunities where tribes could partner with carriers.<sup>7</sup> It also sought input on the usefulness of in-person meetings between providers and tribal leaders. The FCC asked for input regarding previous recommendations by the Native Nations Communications Task Force, which had solicited tribes for input to identify areas where they could partner with carriers.<sup>8</sup> Similar requests have been made in Minnesota for providers to hold in-person meetings with tribes.

### ***b. PUC Order in 19-8<sup>9</sup>***

#### ***i. Acknowledging engagement issues, willingness of companies to engage***

In its Order Certifying Eligible Telecommunications Carriers' Use of Federal High-Cost Subsidy Order on October 17, 2019, the Commission directed: "companies serving tribal lands to fully cooperate with the Department, the tribes, and the Commission to comply with C.F.R. 54.313 (a)(5), using Form 481."(p.3)

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<sup>5</sup> Public Notice, WC Docket No. 10-90, Consumer and Governmental Affairs Bureau Seeks Comment on Effectiveness of its Tribal Engagement Guidance and to Refresh the Record on Related Petitions for Reconsideration, October 21, 2019

<sup>6</sup> *id*

<sup>7</sup> *id*

<sup>8</sup> Review of *Improving and Increasing Broadband Deployment on Tribal Lands*. 2019. Native Nations Communications Task Force. [https://www.fcc.gov/sites/default/files/nnctf\\_tribal\\_broadband\\_report.pdf](https://www.fcc.gov/sites/default/files/nnctf_tribal_broadband_report.pdf)

<sup>9</sup> 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-19-8, Order Certifying Eligible Telecommunications Carrier's Use of Federal High-Cost Subsidy, October 17, 2019

### ***c. January 2020 meeting with companies***

In a meeting between providers that serve tribal lands and Commerce held on January 8, 2020, the Department found that many providers shared concerns about reaching the right point of contact for each tribe. To address this issue, the Department created a spreadsheet of companies and points of contact for tribes. Mary Otto, the Department's Tribal Liaison at the time, had already made an outreach attempt with tribes to help coordinate the points of contact for the tribes. With the assistance of the Minnesota Telecom Alliance, appropriate contacts for providers were added to the spreadsheet, which has been shared with both the providers and the tribes.

### ***d. Orders in 20-8<sup>10</sup> and 21-8<sup>11</sup>***

The Public Utilities Commission's order in Docket 20-8 requires that ETCs serving tribal lands shall continue cooperation with the Commission and the Department in encouraging meaningful Tribal Engagement.<sup>12</sup> It reiterated the federal requirement that ETCs serving tribal lands demonstrate that they have had discussions with tribal governments, as laid out in 47 C.F.R. § 54.313(a)(5).<sup>13</sup> The Department also planned meetings between ETCs and providers though they were postponed because of the COVID-19 pandemic.

A year later, in Docket 21-8, the Department observed that despite some discussions, only limited progress appeared to have been made. The Commission therefore ordered ETCs on tribal lands to submit, "a detailed plan on how it will meaningfully and appropriately engage with all the tribes it serves during the remainder of 2021 and the first half of 2022. The plan shall include:

- A. the carrier's plan to address the individual reporting requirements in Form 481 from the Federal Communications Commission;
- 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."<sup>14</sup>

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<sup>10</sup> Order Certifying Eligible Telecommunications Carriers' use of Federal High-Cost Subsidy, Docket no. P-999/PR-20-8 (20-8)

<sup>11</sup> 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

<sup>12</sup> -20-8

<sup>13</sup> See *supra*

<sup>14</sup> 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

The Commission further ordered: “each ETC that serves tribal lands shall file reports to memorialize its ongoing efforts to reach out to the tribe(s). The reports will be due each year on the first day of January, April, July (as part of the annual filing of Form 481), and October”.<sup>15</sup>

### ***III. Review of Quarterly Filings and Company Meetings***

#### ***a. Background***

The Companies have submitted their plans and quarterly filings to date, as required, with descriptions of their updated Tribal Engagement efforts. The Department followed-up with each company after the January and April 2022 filings. In these meetings, the Department discussed issues and successes of each individual company and their outreach efforts. Many companies expressed ongoing difficulties in receiving responses from tribes and were, therefore, unsure if this lack of response was because the tribe had no engagement needs or for other reasons. Focus was placed on issues where companies fell short in demonstrating that they met the requirements of Form 481. With each quarterly filing, the Department observed improvements, particularly in areas highlighted by the Department in virtual meetings. As the Department observed commonalities among companies from filing to filing it began internal discussions of best-practices.

The need and desire for engagement with service providers vary between tribes. Some tribes have requested an ongoing physical presence of providers on tribal lands while others have requested that providers have no direct contact with tribal members or people residing on tribal lands, other than correspondence which is required by law. Some issues were compounded by the Covid-19 pandemic, which canceled or delayed many in-person meetings of this type. However, the Department has observed that the majority of Minnesota providers on tribal lands have met, plan to meet, and/or would be willing to hold these in-person meetings now and in the future.

As noted in the FCC’s December 5, 2019 Public Notice, carriers reported issues with keeping current on tribal leadership and appropriate points of contact. This observation has also been made by the Department of Commerce. The Department’s contact list of tribal leadership was provided to ETCs and proved useful as providers have adopted it for Tribal Engagement. While companies expressed a willingness to work with and entertain requests from tribes, many had previously reported their trouble making headway or initiating contact.

Some tribes are interested in owning facilities and companies have varied levels of willingness to let tribes own these facilities and equipment. Common concerns among carriers are that tribes may lack the technical knowledge and/or staff to handle the maintenance and upkeep of equipment. Another common concern is the cost of network facilities, and the loss of revenue companies may experience if they make this transition. Currently, there is only one

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<sup>15</sup> 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.

working example of this relationship (between the Shakopee Mdewakanton Sioux Community and Nuvera) but companies have expressed a willingness to review proposals. No company has said “no” to such requests, to the Department’s knowledge, but none have shown enthusiasm for proposals they have seen or anticipate seeing. However, companies have said they are more open to new proposals than they were prior to the Covid-19 pandemic.

## ***b. January***

### ***i. January Filings***

For most providers, January’s quarterly filings followed the requirements of 47 C.F.R. § 54.313(a)(5) with companies responding to each requirement individually. These filings demonstrated that providers made outreach efforts as they were required to, but some companies’ responses lacked depth and detail. It appeared that outreach efforts were aimed at satisfying the FCC and PUC requirements rather than engaging in meaningful outreach with the tribe(s) served. Many providers had ongoing relationships with the tribe(s) they served, though these quarterly filings did not provide a forum to reference company history or prior engagement efforts.

Some providers failed to include any reference regarding discussions of needs assessments or identification of community anchor institutions, as required by 47 C.F.R. § 54.313(a)(5)(i).<sup>16</sup> Additionally, 47 C.F.R. § 54.313(a)(5)(iii) requires companies to market their services, “in a culturally sensitive manner”.<sup>17</sup> Here, several providers claimed to meet the requirement but provided no detail, examples, or background on the matter. Companies did not show that the marketing materials used on tribal lands differed in any way from materials used on non-tribal lands, though it is possible that they may not need to be different.

Many providers did not take ownership of contact lists for tribes. These companies simply copied the names previously provided by the Department, without making updates. Several companies’ outreach correspondence to tribes was full of legal jargon. This was not and is not, in the view of the Department, an effective means of engaging with tribes. The Department also found that some providers’ outreach correspondence was nearly identical from tribe to tribe when the provider served more than one tribe. In these examples, only the name of the tribe and contact person changed from one piece of correspondence to the next. Some of this outreach correspondence was made by provider staff who were not identified as the primary point of contact between the provider and the tribe.

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<sup>16</sup> In the Matter of the Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of Federal Universal Service Support Required Pursuant to C.F.R. § 54.313, Docket No.P-999/PR-19-8, Order Certifying Eligible Telecommunications Carrier’s Use of Federal High-Cost Subsidy, October 17, 2019

<sup>17</sup> id

## ***ii. January Virtual Meetings***

The Department held individual meetings with each provider virtually to discuss the issues staff identified in their January quarterly filings. Companies which had not previously included a needs assessment agreed to include a discussion of such in future filings. Providers also agreed to expand and offer more detail regarding each requirement of these quarterly updates. This included providing details and possibly copies of outreach efforts and details of any marketing materials used on the tribal land(s) served. Companies which had used the contact list provided by the Department agreed to take ownership of their points of contact and no-longer reference these contacts as Commerce-identified points of contact.

## ***c. April***

### ***i. April Filings***

In reviewing the April filings, the Department noted slight improvements in engagement efforts for most companies but found that some issues carried over from the previous filings. Specifically, documents or information demonstrating that companies had discussions about needs assessments were still absent from several providers' filings. The same providers did not identify community anchor institutions, though the Department had requested this information. Many providers again claimed to market their services in a culturally sensitive manner without offering further detail or examples.

Providers did, however, offer more detail on their outreach efforts to the tribe(s) they serve. Some provided copies of correspondence they sent to tribes, and some offered a summary of their outreach correspondence. Most providers took ownership of their contact lists and outreach correspondence was handled by the person identified by the company as the primary point of contact for Tribal Engagement.

### ***ii. April Virtual Meetings***

The Department held virtual meetings with each provider to discuss April's quarterly filings. Conversations with providers revealed that the information in quarterly reports was only a small portion of their engagement efforts. It became apparent, in most cases, that providers were more aware of the needs and desires of the tribe(s) served than their reports demonstrated. Providers were also able to identify anchor institutions on tribal lands, but several providers expressed confusion regarding what qualifies as an anchor institution.

Providers were asked if they felt that relationships between their companies and the tribe(s) they serve had improved from the last quarter. All providers stated that relations had improved, overall. Many providers, however, again noted issues with Tribal Engagement and the lack of response to outreach correspondence, including phone calls and emails which had not been responded to by their tribal contacts.

The Department heard that some tribes were interested in owning facilities that would be operated by providers. Providers were willing to discuss arrangements such as these, but some stated they would be reluctant to operate facilities they didn't own. Many providers were concerned that tribes lacked the technical knowledge to manage the equipment and facilities, should they be owned by the tribe. Providers were also asked if they are, or would be, willing to share service area maps with the tribes. The majority of providers expressed a willingness to share these maps, but some companies believed this was providing tribes with too much detail, possibly giving competitors an advantage.

#### ***d. July***

##### ***i. July Filings***

The Department again reviewed quarterly filings which were due on July 1, 2022. Several providers filed quarterly reports which addressed concerns previously identified in meetings with the Department. At the same time, other providers have yet to address issues which have been raised on multiple occasions by the Department. These issues include providers not taking ownership of their lists of tribal contacts and providers whose quarterly reports do not identify community anchor institutions.

Many companies showed improvements in several areas. First, some companies that filed July updates included needs assessments and several identified community anchor institutions, as requested by the Department. Other providers previously acknowledged that references to tribe(s)' needs assessments and community anchor institutions should be added but did not address them in these July filings. Demonstrating that a company has had these discussions with the tribe(s) they serve is the first item required under 47 C.F.R. § 54.313(a)(5), which states: "documents or information demonstrating that the ETC had discussions with tribal governments that, at a minimum, included: (i) A needs assessment and deployment planning with a focus on tribal community anchor institutions".

Companies which summarized these discussions about needs assessments also tended to have better-documented outreach correspondence. Some providers documented just one or two contacts with the tribe(s) served between the April and July filings. In these examples, it appears that some providers simply received no requests from the tribe(s) they serve. However, one provider sent some of its outreach correspondence the day before its quarterly report was submitted.

One provider documented over 40 contacts with the tribes it serves, with timely responses in every example. Several providers have met or plan to meet with tribes in person, whether at the companies' facilities or on tribal lands. The outreach correspondence provided in these filings addresses the Department's concern that the requirement for engagement is on the providers and not on the tribes.

#### ***IV. Company Specific Notes; Quarterly Reports and Meetings***

Summaries of the Companies' responses to the requirement for a narrative explaining quarterly outreach efforts are listed below. The Department also sought feedback from tribal leaders regarding the filings by the ETCs and noted that there was no obligation that the tribes respond to the Department's request. Pertinent information regarding these quarterly reports and follow-up meetings are noted below.

##### **1. Arrowhead Electric Coop. Inc. (AEC)**

###### **i. Tribes Served**

AEC serves the Grand Portage Band of Lake Superior Chippewa.

###### **ii. Unique Characteristics of the Company**

AEC is primarily an Internet Service Provider (ISP). It serves nearly the whole land area of Grand Portage or about 300-400 homes. AEC's first filing came in the second quarter, as it had recently been approved for RDOF funding. AEC operated as an ISP prior to this approval.

###### **iii. What the Company is Doing Well**

AEC's quarterly filing and April meeting with the Department demonstrate that it has and further intends to build a working relationship with the Grand Portage Band. AEC is willing to send representatives to meet directly with Tribal leadership and Tribal members, including participating in a wellness fair on June 11. The fair was held at the Grand Portage Community Center and AEC provided applications for ACP and Lifeline. AEC shows a willingness and enthusiasm to continue engagement efforts. AEC's service includes 100Gb fiber. AEC also included a copy of the flyer it used to publicize the ACP, which described benefits in approachable terms and was made available on the Tribe's Facebook page and in community buildings. AEC's July report showed that it has maintained open lines of communication with the Tribe it serves. It included a needs assessment and took ownership of its list of contacts.

###### **iv. Concerns**

The Department observes no concerns at this time and has not heard concerns from Grand Portage.

###### **v. Summary**

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)**

### **i. Tribes Served**

Arvig serves the Boise Fort Band of Chippewa, the Leech Lake Band of Ojibwe, and the White Earth Nation.

### **ii. Unique Characteristics of the Company**

Arvig proposed expanding its service area on the White Earth reservation to cover hundreds of additional customers. It has not formalized any projects and continues to evaluate cost-effectiveness.

### **iii. What the Company is Doing Well**

Arvig has expressed a willingness to share coverage maps with the Tribes it serves. Arvig sends correspondence to each of the Tribes it serves, though some of this correspondence has not been responded to. In the instances where Arvig has received a response to its outreach efforts, particularly with Leech Lake, it appears to have a strong understanding of the Tribe's desires. Furthermore, Arvig's filings have stated it is willing to work with the Tribes served particularly with joint building and grant opportunities. In its most recent filing, Arvig documented that new accounts have been added on Tribal lands. 21 customers added ACP broadband credits and 9 customers added lifeline credits. Arvig has made edits to its website and posted flyers at several tribal locations to better explain benefits and make benefit information more accessible.

### **iv. Concerns**

Arvig's most recent filing does not specifically include evidence of discussions about a needs assessment, though it does include documentation of its efforts to increase awareness of benefits to customers on Tribal lands. Arvig may continue to rely on an outdated contact list previously provided by the Department of Commerce. Arvig is reluctant to allow Tribes to own their own facilities but has not ruled-out this possibility.

### **v. Summary**

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)**

#### **i. Tribes Served**

Frontier serves the Bois Forte Band of Chippewa, Fond du Lac Band of Lake Superior Chippewa, and Mille Lacs Band of Ojibwe.

#### **ii. Unique Characteristics of the Company**

Frontier no-longer receives High-Cost support as an ETC, and it appears this exempts Frontier from complying with 47 C.F.R. § 54.313(a)(5), which begins with “Any recipient of high cost support shall provide.....” However, Frontier remains an ETC under Minn. Stat. 237 and has continued to participate in discussions regarding Best-Practices for Tribal Outreach and Engagement. Though it serves portions of the Fond du Lac Band of Lake Superior Chippewa, this Tribe has its own ETC and has few, if any, needs from Frontier.

#### **iii. What the Company is Doing Well**

Frontier has maintained open lines of communication with each Tribe it serves and has been willing to discuss the needs and requests received. It submitted quarterly reports in January and April and participated in the Best-Practices for Tribal Engagement meeting in May.

#### **iv. Concerns**

Frontier serves a large portion of tribal land. As Frontier no-longer receives high-Cost support, it appears it is no longer required to comply with the tribal engagement requirements. To the extent that Frontier is the only landline provider on tribal land, there is not a process/tool to ensure the needs of residents on these tribal lands are being met.

#### **v. Summary**

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.

### **4. Garden Valley Telephone Company (GVTC)**

#### **i. Tribes Served**

GVTC serves the Red Lake Nation and White Earth Nation.

**ii. Unique Characteristics of the Company**

GVTC serves with 100% fiber service on Red Lake Nation and White Earth Nation. GVTC is willing to discuss unique ownership and management arrangements of facilities with Tribes but has not yet seen a proposal they are comfortable with.

**iii. What the Company is Doing Well**

GVTC's outreach is timely and direct. GVTC has established contact with the Tribes it serves. GVTC is responsive to requests made by the Department regarding Tribal Engagement including a willingness to discuss Tribal Engagement topics, both on positive interactions and interactions with challenges. In one instance, the Department's former Tribal Liaison, Lorna LaGue facilitated a conversation where the company and a Tribe it serves had a conflict. GVTC has an open dialogue and a well-documented history of its Tribal Engagement efforts.

**iv. Concerns**

GVTC has addressed previous concerns presented by the Department.

**v. Summary**

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)**

**i. Tribes Served**

JTC serves the Leech Lake Band of Ojibwe with telephone and internet service.

**ii. Unique Characteristics of the Company**

JTC has regular, direct contact with Leech Lake Band of Ojibwe's contact person (Sally Fineday) and is open to unique/new solutions to the requests and needs of the Tribe. JTC has been working with the Bug O Nay Ge Shig School to ensure that all students have internet access.

**iii. What the Company is Doing Well**

JTC has improved its relationship with Leech Lake, especially with the Bug O Nay Shig School project. JTC has met with, and continues to be willing to meet with, the Tribe face-to-face. JTC has had discussions on mapping and right-of-way issues and shows an openness to sharing that information with the Tribe. JTC has completed build out projects to two housing

areas on the Leech Lake reservation and has three additional projects planned for 2022 on the Leech Lake reservation.

**iv. Concerns**

JTC has addressed previous concerns presented by the Department. The Department observes no concerns at this time and has not heard of additional concerns from the Leech Lake Band of Ojibwe.

**v. Summary**

JTC has open dialogue with Leech Lake 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 Leech Lake 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)**

**i. Tribes Served**

CenturyLink serves all 11 Tribes: the Bois Forte Band of Chippewa, the Fond du Lac Band of Lake Superior Chippewa, the Grand Portage Band of Lake Superior Chippewa, the Leech Lake Band of Ojibwe, the Lower Sioux Indian Community, the Mille Lacs Band of Ojibwe, the Prairie Island Indian Community, the Red Lake Nation, the Shakopee Mdewakanton Sioux Community, the Upper Sioux Community, and the White Earth Nation.

**ii. Unique Characteristics of the Company**

CenturyLink serves Tribes in Minnesota and out of state and is the largest provider of services on Tribal lands in Minnesota.

**iii. What the Company is Doing Well**

CenturyLink outreach is regular, structured, and contacts are well-documented. CenturyLink has been receptive to feedback from the Department regarding Tribal Engagement and has participated in individual meetings, and the collective Best-Practices Recommendations meeting.

**iv. Concerns**

CenturyLink's filings have not included any evidence of discussions about needs assessments and it continues to use an out-of-date contact list, once provided by the Department. Though it has a well-documented record of reaching out to Tribes, it has only

addressed a portion of the issues the Department raised with its quarterly reports. Specifically, CenturyLink has not memorialized, in writing, its feasibility and sustainability planning, or explained how it markets its services in a culturally sensitive manner. Additionally, CenturyLink's outreach correspondence to Tribes has occurred within only a day of it filing a quarterly update. Through email correspondence, the company took more than three weeks to identify which of its entities served the Lower Sioux Indian Community. With delayed correspondence, CenturyLink's quarterly reports contain outdated updates and its July filing is not a useful snapshot of recent events.

**v. Summary**

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)**

**i. Tribes Served**

Nuvera serves the Shakopee Mdewakanton Sioux Community with telephone and internet service.

**ii. Unique Characteristics of the Company**

Nuvera works closely with the Shakopee Mdewakanton Sioux Community. Nuvera handles end-user subscriptions while the facilities are owned by the Tribe.

**iii. What the Company is Doing Well**

Nuvera takes a responsive approach to Tribal Engagement. While it meets the requirements of sending correspondence and outlining the requirements of 47 C.F.R. § 54.313(a)(5), the actions it takes are almost entirely based on the requests made and initiated by the Tribe. One example of this is that Shakopee Mdewakanton Sioux Community handles all marketing materials except for materials which may be required by law. Nuvera's engagement is unique, and it demonstrates a strong understanding of the needs of the Tribe.

**iv. Concerns**

Nuvera has addressed previous concerns presented by the Department. The Department observes no concerns at this time and has not heard of additional concerns from the Shakopee Mdewakanton Sioux Community.

**v. Summary**

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)**

**i. Tribes Served**

PBRTC serves the Red Lake Nation and the Leech Lake Band of Ojibwe with telephone and internet service.

**ii. Unique Characteristics of the Company**

PBRTC makes frequent contact with both the Leech Lake Band of Ojibwe and the Red Lake Nation. PBRTC has shown a willingness to assist customers with the Affordable Connectivity Program Applications. Recently, PBRTC participated in events on the Red Lake and Leech Lake reservations where it received over 40 applications for assistance programs. PBRTC's board includes a member of the Red Lake Nation and Tribal Council. PBRTC has expressed a willingness to discuss unique requests by the Tribes regarding the ownership and operation of facilities.

**iii. What the Company is Doing Well**

PBRTC is responsive to the requests made by the Tribes it serves, particularly regarding ACP applications and assistance. PBRTC planned to send representatives to Leech Lake to assist people with ACP applications and possibly train tribal representatives on the application process. PBRTC also hosts annual meetings with Tribes at its corporate office to discuss needs, sustainability, and marketing its services in a culturally sensitive manner.

**iv. Concerns**

PBRTC has addressed previous concerns presented by the Department. The Department observes no concerns at this time and has not heard of additional concerns from the Leech Lake Band of Ojibwe or the Red Lake Nation.

**v. Summary**

One issue that PBRTC highlighted was its concern that the Affordable Connectivity Program 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 (SC)**

### **i. Tribes Served**

SC serves the Mille Lacs Band of Ojibwe with telephone and internet service.

### **ii. Unique Characteristics of the Company**

SC has a long, working relationship with Mille Lacs Band representatives and leadership but is a new ETC.

### **iii. What the Company is Doing Well**

SC has been working on buildout projects to residential properties but noted that the cost of building has jumped 30% in consecutive years. SC was recently awarded RDOF blocks but needs approval from the Mille Lacs Band of Ojibwe to build out further. Without approval from the Tribe, SC may not be able to satisfy its RDOF bids and could incur penalties.

### **iv. Concerns**

SC has addressed previous concerns presented by the Department regarding its quarterly filings. The increasing cost of construction is a concern, as well as SC's ability to complete build out projects without cooperation from the Tribe. The Department has not heard of additional concerns from the Mille Lacs Band of Ojibwe.

### **v. Summary**

SC 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.

## **10. Wikstrom Telephone Company (Wikstrom)**

### **i. Tribes Served**

Wikstrom serves parts of the Red Lake Nation.

### **ii. Unique Characteristics of the Company**

Wikstrom has no customers but continues to reach out to the Tribe on a quarterly basis.

### **iii. What the Company is Doing Well**

While it has no customers, Wikstrom is willing to listen to the needs of the Tribe and has shared a map indicating a phone line replacement. Wikstrom also expressed a willingness to share more detailed mapping information if there was a request or need from the Tribe.

### **iv. Concerns**

Wikstrom has addressed previous concerns presented by the Department. The Department observes no concerns at this time and has not heard of additional concerns from the Red Lake Nation.

### **v. Summary**

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.

## ***V. Best Practices***

To facilitate and encourage meaningful engagement between ETCs and tribes, the Department drafted best practice recommendations for Tribal engagement. These recommendations were based on requests made by tribes, observations made by the Department, examples of business practices which showed positive results and responses, business practices which showed negative results and responses, observations by the Department of 47 C.F.R. § 54.313(a)(5), and common-sense solutions. Many of the issues identified by the Department were based on the filings submitted by the providers.

The draft of best-Practices was presented by the Commissioner of Commerce to the Minnesota Indian Affairs Council (MIAC), seeking feedback from tribes. Following the presentation to the MIAC, on May 25, 2022, the Department met with companies to share and discuss the best practices recommendations. Some providers did express concern about sharing detailed up-to-date maps of existing service within reservation boundaries because such information was deemed to be competitively sensitive data. Providers did indicate they are willing to share maps with tribes, so long as those maps did not include trade-secret data and were not shared with any other parties.

The Best-Practices Recommendations for Tribal Engagement are attached as Attachment 1. These best practices are slightly modified from what was originally presented to the tribes and service providers, as feedback and other communication provided some refinements to the language. If adopted by the Commission, these best practices are intended to encourage providers to establish productive relationships with the tribe(s) served, to expand and improve the availability of services, and increase the take-rates of benefits available to residents of tribal lands. The best practices are not meant to be a one-size-fits-all approach as each provider has a unique capacity to offer services and each tribe has unique needs and requests.

## **VI. Conclusion**

Tribal Engagement and relationships between providers and tribes have shown improvement, especially following the additional requirements for quarterly reports by the Public Utilities Commission. Recently, there has been increased interest from tribes regarding owning their own facilities. Though no plans have been made, this interest should be monitored to ensure that customers receive reliable service. Challenges remain but it appears that engagement efforts have improved overall. Many companies have expressed a willingness to review new and unique proposals and requests from the tribe(s) they serve. Providers have highlighted that the Covid-19 pandemic has brought on new challenges, requiring providers to become more flexible when it comes to meeting the requests of the tribe(s). The Department has encouraged providers to keep an open dialog with the tribe(s) served and to include the Department and its Tribal Liaison in situations where conflicts arise. The Department hopes that the Best-Practices Recommendations for Tribal Engagement leads to stronger relationships between providers and tribes and ultimately leads to higher take-rates of discounts and benefits for low-income customers and customers residing on tribal lands.

## **VII. Recommendations**

The Department recommends that the Commission:

- a. Adopt the Best Practices Recommendations for Tribal Engagement, presented here as Attachment 1.
- 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.

### **Best Practices Recommendations for Tribal Engagement**

The following Best Practices recommendations serve as a guide for providers to be responsive to the unique needs of the tribes they serve and to ensure that they meet the requirements of 47 C.F.R. 54.313 (a)(5).<sup>18</sup> These best practices echo the work some providers have demonstrated and were compiled based on discussions with some tribal leaders.

1. **Tribes are sovereign nations. Address all correspondence to the tribal contact using respectful, culturally sensitive language.** All correspondence concerning engagement should be addressed to the appropriate contact person. Letters and emails should be written with the understanding that the requirement for engagement is on the providers, not on the tribes. A form letter detailing the federal requirements and then offering a meeting is not a good practice. Instead, the correspondence should build upon past experiences and identify possible future activity. Once contact is well established, follow the desires of the tribal contact person concerning the manner of communications and how/whether to copy the tribal chair or other concerned persons.
2. **Maintain current contact lists and respond in a timely manner.** Identify tribal contacts who can discuss the needs of tribal members pertaining to telecommunication service and the provider personnel who have the responsibility to work with the tribes. Providers should respond to communications from these identified individuals in a timely manner. If initially providers do not get a response to their reach out efforts, providers should continue to reach out, especially with phone calls.

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<sup>18</sup> 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:

- (i) A needs assessment and deployment planning with a focus on tribal community anchor institutions;
- (ii) Feasibility and sustainability planning;
- (iii) Marketing services in a culturally sensitive manner;
- (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- (v) Compliance with tribal business and licensing requirements. Tribal business and licensing requirements include business practice licenses that Tribal and non-tribal business entities, whether located on or off tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services to the tribes, tribal members, or tribal lands. These include certificates of public convenience and necessity, tribal business licenses, master licenses, and other related forms of tribal government licensure.

3. **Have at least quarterly check-ins with tribal contacts, unless directed otherwise by the tribe.** Providers should initiate contact with tribes quarterly, or as often as desired by the tribe(s) served. If provider staff or tribal contacts change, providers should initiate introductions with the tribe served. This check-in is best when a face-to-face meeting can be arranged. Each tribal staff member may have many roles, and engagement works best if information is concise and complete. Providers should memorialize these check-ins, outreach attempts, and their outcomes.
4. **Develop a needs assessment that is memorialized in writing, with the understanding that it must be a living document.** As providers engage in discussions with the tribes, there is an opportunity to learn what the tribes believe can benefit the tribal lands, including service to community centers, schools, healthcare facilities, and other anchor institutions. It works best if this needs assessment is viewed as a living document, outlining the unique needs of the tribe. The needs assessment should change as needs are met and other needs develop.
5. **Provide the tribe with up-to-date maps.** Provide the tribe with up-to-date maps of their existing service within the reservation boundaries and update the maps as changes occur.
6. **Up-to-date and easy-to-navigate websites.** Providers should have up-to-date and easy-to-navigate websites covering all their services, including descriptions and application information for low-income assistance programs. These low-income assistance programs include the Affordable Connectivity Program (ACP), Lifeline, Link-Up and the Telephone Assistance Plan (TAP). Company websites should provide information specific to residents living on tribal lands. Websites should include contact information so that customers and potential customers can discuss programs and seek assistance directly with an agent. Company websites should follow the best practices for Lifeline as established by the Minnesota Public Utilities Commission in its July 20, 2021 Order in Docket 20-747.
7. **Publicize affordability programs that benefit residents on tribal lands.** Only 12% of eligible Minnesota households participate in Lifeline and TAP, and participation is even lower on tribal lands. Residents of tribal lands can benefit from programs such as Lifeline, Link-Up, TAP, and the Affordable Connectivity Program, particularly since there are enhanced benefits for households on tribal lands. Provider personnel working directly with the tribal land customers at tribal locations can greatly benefit residents who are eligible for these low-income assistance programs. In advance of being at the agreed upon location on the tribal land, information and applications can be distributed ahead of time. It would be an added benefit if the provider trains tribal members to assist others in signing up for these services.

The following programs provide assistance to low-income consumers:

1. The Affordable Connectivity Program (ACP)

[Affordable Connectivity Program \(ACP\) | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/affordable-connectivity-program-ACP)

The ACP provides a discount of \$75 per month toward broadband/internet service for low-income residents of tribal lands. Eligible households can also receive a one-time discount of up to \$100 to purchase a laptop, desktop computer, or tablet from participating providers. The ACP discount can be combined with the Lifeline Benefit and connection charges can be lessened through the Link-Up program. If voice service is purchased from a certified provider, the benefit can also be combined with the state Telephone Assistance Program (TAP).

2. Lifeline

[Home - Universal Service Administrative Company \(lifelinesupport.org\)](https://lifelinesupport.org/)

Lifeline provides a discount of up to \$34.25 per month for broadband/internet to eligible households on tribal lands. If the subscriber has only voice service, the discount is \$30.25 to those on tribal lands. Subscribers eligible to receive Lifeline are also eligible to receive the ACP. A separate application for the ACP and Lifeline is required.

3. Link-Up

[Enhanced Tribal Benefit - Universal Service Administrative Company \(usac.org\)](https://usac.org/enhanced-tribal-benefit)

Link-Up is available to eligible Lifeline subscribers, providing a 100% reduction (up to \$100) of the charge for starting telecommunications service at a Tribal Lifeline subscriber's primary residence. Link-Up is only available to subscribers who reside on tribal lands.

4. Telephone Assistance Plan (TAP)

[Apply For Telephone Discounts / Public Utilities \(mn.gov\)](https://mn.gov/public-utilities/telephone-discounts)

TAP is a \$10 per month credit for landline voice telephone service. It is in addition to the Lifeline and ACP monthly discounts. If a subscriber enrolls in Lifeline and receives a voice telephone service by a company with a certificate of authority to operate in Minnesota, the subscriber will be auto-enrolled to receive the TAP credit. In other words, a separate application is not needed. If a subscriber enrolls in the ACP, but not Lifeline, there is not an auto-enrollment process to receive the TAP credit and a separate application is needed.

## **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  
Tribal Engagement Report**

**Docket No. P999/PR-22-8**

**Dated this 29<sup>th</sup> day of September 2022**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sam	Bailey	Sam.Bailey@iwirelesshom e.com	i-Wireless	1 Levee Way Ste 3116  Newport, KY 41071	Electronic Service	No	OFF_SL_22-8_PR-22-8
Tracy	Bandemer	Tracy.Bandemer@itccoop. com	Interstate Telecommunications Cooperative, Inc..	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	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_22-8_PR-22-8
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S  Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_22-8_PR-22-8
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
David	Bickett	dave.bickett@parkregion.c om	Otter Tail Telcom	PO Box 277 100 Main St Underwood, MN 56586	Electronic Service	No	OFF_SL_22-8_PR-22-8
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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 Sebekas, 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
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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

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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@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
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
Donna	Eul	Donna.Eul@Aciracoop.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_22-8_PR-22-8
Donna	Eul	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S  Bellingham, MN 56212	Electronic Service	No	OFF_SL_22-8_PR-22-8
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St  Lincoln, NE 68508	Electronic Service	No	OFF_SL_22-8_PR-22-8
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd  Columbus, OH 43231-5931	Electronic Service	No	OFF_SL_22-8_PR-22-8
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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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
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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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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