

STATE OF MINNESOTA BEFORE THE PUBLIC UTILITIES COMMISSION

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**LTD BROADBAND LLC APPLICATION FOR ELIGIBLE TELECOMMUNICATIONS
CARRIER DESIGNATION**

LTD Broadband LLC (“LTD” or the “Company”) participated in the Federal Communications Commission’s (“FCC”) Connect America Fund Phase II (“CAF II”) auction (“Auction 903”) and was deemed a winning bidder for 840 locations in the eligible census blocks in the census block groups identified in Exhibit B (hereinafter referred to as “Funded Areas”). In this petition, LTD requests an ETC designation for these Funded Areas, which will be given a Study Area Code upon final FCC authorization of CAF II funding. With this Application, and supporting documents, LTD seeks an Order from the Minnesota Public Utilities Commission (“MPUC” or “Commission”) which designates LTD’s census blocks an ETC in the Funded Areas in the census block groups listed in Exhibit A, pursuant to § 214(e) of the Communications Act of 1934.

I. Background

On August 28, 2018, the FCC released a Public Notice¹ announcing the conclusion of Auction 903. Areas that will receive support through this auction are locations in census blocks in rural areas served by price cap carriers that do not have access to broadband at speeds of at least 10 Mbps downstream and 1 Mbps upstream (“10/1”). The FCC has determined that these areas are rural, sparsely populated, and historically, there has not been a viable business case that makes financial and operational sense for investing in state-of-the-art broadband infrastructure in the absence of sufficient and predictable universal service support. The CAF Phase II funding, grant funding, loans and other financial tools, provide sufficient incentives for entities, such as LTD, to expand their existing footprints and serve the rural areas identified for support in Auction 903.

Carriers awarded support in this auction must deploy broadband to the specified number of locations in eligible census blocks in the census block groups in which they bid within a six-year period at the speed tier specified in their bid. Funding in the form of CAF II support will be provided monthly over a ten-year period based upon the amount of their winning bid.

LTD participated in this auction and was among the 103 providers listed as provisional winners. LTD will receive \$1,104,440.80 over a ten-year period to build a network capable of delivering 25/3, low latency broadband to the 840 locations in the Funded Areas upon completion of certain post-auction requirements. One of these requirements is for LTD to be designated an ETC in the Funded Areas by February 25, 2019. Accordingly, grant of this application is vital for consumers in rural Minnesota to be able to receive high speed broadband. The services offered to these subscribers will be the same as LTD provides other customers in Minnesota and Iowa. These services consist of both IP-Voice Services and fixed wireless Broadband service.

¹ Connect America Fund Phase II Auction (Auction 903) Closes; Winning Bidders Announced; FCC Form 683 Due October 15, 2018, Public Notice, AU Docket No. 17-182, WC Docket No. 10-90, DA 18-887 (rel. Aug. 28, 2018) (“Provisional Winners PN”).

II. Authority to Designate the Funded Areas

Pursuant to 47 USC § 214(e)(2), a state commission may designate a common carrier that meets the requirements of 47 USC § 214(e)(1) as an ETC for a service area designated by the state commission. Further, the Commission has authority to designate telecommunications companies as ETCs to receive universal service support under sections 214 and 254 of the Communications Act of 1934, as amended by the Federal Telecommunications Act of 1996 (“the Act”) and has authority to designate geographic service areas for ETCs to receive the support.

47 USC § 153(11) defines a common carrier as "any person engaged as a common carrier for hire, in LTD or foreign communication by wire or radio or in Interstate or foreign radio transmission of energy, except where reference is made to common carriers not subject to this Act; but a person engaged in radio broadcasting shall not, insofar as such person is so engaged, be deemed a common carrier."² LTD provides information services and will continue doing so in the Funded Areas in which it seeks designation. Additionally, as demonstrated below, LTD satisfies the requirements of Section 214(e)(1) for designation as an ETC in the Funded Areas. Accordingly, the Commission has the authority to designate LTD as an ETC in the Funded Areas.

III. LTD Satisfies All the Requirements for Designation as an ETC

Section 214(e)(1) of the Communications Act of 1934, as amended and Section 54.201(d) of the rules of the FCC require ETCs to, throughout their service areas for which designation is received, (1) offer the services supported by federal universal service support mechanisms, (2) either using its own facilities or a combination of its own facilities and resale of another carrier’s services, and to (3) advertise the availability of such services and the charges using media of general distribution³.

A. ETCs Must Offer Supported Services Through its Own Facilities or Through a Combination of its Own Facilities and Resale

In order to be designated as an ETC, a carrier must offer the services that are supported by universal support mechanisms, which are voice telephony services and broadband service as

² 47 USC § 153(11).

³ 47 U.S.C. §214(e)(1); 47 C.F.R § 54.201(d)(1). 47 C.F.R § 54.201(d)(1) defines the term “facilities” as meaning “any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support”

defined in Section 54.101 of the Commission's Rules⁴ either through its own facilities or a combination of its own facilities and resale of another carrier's facilities. Section 54.101(a)(1) defines voice telephony services eligible for universal service support as:

services [that] must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.⁵

Section 54.101(a)(2) defines broadband Internet access services eligible for universal service support as:

services [that] must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.⁶

The FCC has additional buildout requirements for carriers that are awarded CAF Phase II auction support. Pursuant to these requirements, LTD must be able to provide 25/3 Mbps broadband to the 840 locations in the Funded Areas within a six-year period.⁷

⁴ 47 C.F.R. §54.101.

⁵ 47 C.F.R. §54.101(a)(1)

⁶ 47 C.F.R. §54.101(a)(2). Section 54.101(c) requires ETCs "subject to a high-cost public interest obligation to offer broadband Internet access services" to offer broadband services "within the areas where it receives high-cost support."

⁷ For recipients of CAF Phase II support, the FCC waived the requirement that winning bidders seeking an FCC ETC designation file a five-year improvement plan and demonstrate that it will satisfy applicable consumer protection and service quality standards. See WCB Reminds Connect America Fund Phase II Auction Applicants of the Process For Obtaining a Federal Designation as an Eligible Telecommunications Carrier, Public Notice, WC Docket Nos. 09-197, 10-90, DA 18-714 (rel. July 10, 2018) at pp 4-5.

B. LTD Hereby Demonstrates That it will Offer and Provide Each of the Above-listed Services Through its Own Facilities and Resale of Another Carrier's Origination and Termination

1. Voice Grade Access to the Public Switched Network or its Functional Equivalent

Voice grade access to the Public Switched Network or its functional equivalent is provided by LTD using Twilio as a wholesale VoIP provider along with our voice softswitch cluster.

VoIP voice services will be offered to customers. Our softswitch cluster is readily scalable far beyond current usage levels to easily accommodate additional voice customers. Voice switching, broadband backhaul, customer care, network operations and administration will be shared with our current operations. LTD already has data connection to the internet and voice interconnection with Twilio for the exchange of traffic.

2. LTD Offers Minutes of Use for Local Service Provided at No Additional Charge to End Users

LTD will offer voice products in the rate centers of the Funded Areas provisionally awarded to the Company. The local service includes free local calling to the rate centers included with the line for a fixed price.

3. LTD Will Satisfy the Requirement for Access to Emergency Services

LTD will provide access to emergency services through 911 access to the PSAP for all rate centers, as provided our wholesale VoIP providers' operations today. The requirement that ETCs offer access to 911 or enhanced 911 ("E911") applies only "to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems."⁸

4. LTD Will Offer Toll Limitation Services

As part of the requirement that ETCs offer Lifeline discounts to qualifying customers, Section 54.400(d) of the FCC rules require ETCs to offer toll limitation services.⁹ According to this rule, toll limitation service "denotes either toll blocking or toll control service for [ETCs] that are incapable of providing both services" or denotes both toll blocking and toll control

⁸ 47 C.F.R. § 54.101(a)(5).

⁹ 47 C.F.R. § 54.404(d).

service for ETCs that are capable of providing both services.¹⁰ LTD is able to provide toll control service and will provide toll limitation service in the Funded Areas.

5. LTD Will Advertise its Universal Service Offerings

LTD commits to advertise the availability of, and charges for, the supported services using media of general distribution, consistent with its existing advertising practices. The advertising will occur through a combination of media channels, such as the local newspapers in each community, direct mail, website, TV ads and social media.

C. LTD Meets the Additional Eligibility Criteria Adopted by the FCC

In its *2005 ETC Order*,¹¹ the FCC adopted additional criteria that all ETC applicants must satisfy in order to be granted ETC status. The criteria, as set forth in Section 54.202 of the FCC's Rules, require that an ETC applicant must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area; (3) demonstrate its ability to remain functional in emergency situations; (4) demonstrate that it will satisfy consumer protection and service quality standards.¹² To the extent applicable, LTD will meet each of these additional criteria

1. LTD Certifies that it Will Comply with Service Requirements Applicable to the Support that it Receives

In its *2005 ETC Order*, the FCC required that an ETC applicant "make specific commitments to provide service to requesting customers in the service areas for which it is designated as an ETC." Specifically, the FCC found that if the ETC's network already passes or covers the potential customer's premises, the ETC should provide service immediately. In those instances where a request comes from a potential customer within the applicant's licensed service area but outside its existing network coverage, the ETC applicant should provide service within a reasonable period of time if service can be provided at reasonable cost by: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other

¹⁰ 11 Id. 47 C.F.R. § 54.404((b) defines toll blocking as "a service provided by an [ETC] that lets subscribers elect not to allow the completion of outgoing toll calls from their telecommunications channel" while 47 C.F.R. § 54.404(c) defines toll control as "a service provided by an [ETC] that allows subscribers to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or per billing cycle."

¹¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order")

¹² See, 47 C.F.R § 54.202.

equipment; (3) adjusting the nearest cell tower; (4) adjusting network or customer facilities; (5) reselling services from another carrier's facilities to provide service; or (6) employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment.

The FCC stated that if an ETC applicant determines that it cannot serve the customer using one or more of these methods, “then the ETC must report the unfulfilled request to the Commission within 30 days after making such determination.”

LTD hereby certifies that it will comply with the service requirements applicable to the supported voice and broadband services that it will be offering in the Funded Areas, including the requirements for the CAF II auction program. LTD will submit a certification by a professional engineer as part of its CAF II long form application, which states that the Company’s network is providing voice and data services to customers in the Funded Areas and the network capacity can handle the anticipated peak service loads.

2. Five-Year Plan for Proposed Improvements or Upgrades

LTD will provide service to the locations for which it has been awarded support, consistent with the deployment obligations associated with the CAF Phase II auction program. All LTD service areas will be constructed with a hybrid fiber optic and fixed wireless network, with the ability to deliver 25/3 Mbps services to 95% of the 840 awarded. The proposed buildout plan for the CAF II Funded Areas is to extend the existing fiber network to those census blocks listed in Exhibit B.

3. LTD Will Remain Functional in Emergency Situations

LTD hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).¹³ LTD’s voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can modify network routing and weighting as needed to reroute traffic around damaged facilities. Traffic management capabilities will also allow LTD to manage traffic spikes throughout its network, as emergency situations require.

¹³ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of maintaining traffic spikes resulting from emergency situations.”

Specifically, pursuant to Minnesota Administrative Rule 7810.3900, “Emergency Operations,” LTD has established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God, including provisions for emergency power that meet or exceed the rule requirement to provide a minimum of four hours of battery service at each tower site in the network path servicing an awarded census location, and mobile power units that can be delivered on short notice and which can be readily connected to towers without installed emergency power facilities.

LTD has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service. The Company also complies with the FCC’s backup power requirements that became effective in 2015.¹⁴

4. LTD Will Satisfy Consumer Protection and Service Quality Standards

In establishing this certification in its *2005 ETC Order*,¹⁵ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”¹⁶ The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement, and that the sufficiency of other commitments would be considered on a case-by-case basis.¹⁷ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”¹⁸

LTD hereby certifies that it is complying with applicable service quality standards and consumer protection rules. LTD is subject to service quality standards and consumer protection obligations under both federal and, to a limited extent under Minnesota state law as a telecommunications carrier subject to Minnesota Public Utilities Commission regulation. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff

¹⁴ 47 C.F.R. § 12.5.

¹⁵ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“2005 ETC Order”).

¹⁶ *Id.* at ¶ 28.

¹⁷ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new services; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.”

¹⁸ *Id.* at n. 72.

pursuant to the requirements of the MPUC which discloses rates, terms and conditions of service to customers; (2) adherence to state consumer protection and service quality requirements governing telephone providers which requires compliance with the Minnesota Administrative Rules;¹⁹ (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In addition, LTD certifies compliance with broadband-specific consumer protection obligations under both state and federal law. The federal law obligations include, but are not limited to the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in FCC 47 CFR Part 8 § 8.3.

IV. Grant of This Application Will Serve the Public Interest

LTD is the largest fixed wireless Internet service provider in Minnesota and covers over 250,000 locations from a network of more than 1200 towers with 25/3 Mbps broadband.

LTD was founded in 2011 and is limited liability corporation Wireless Internet Service Provider ("WISP") headquartered in Las Vegas, Nevada. The Company provides broadband services to more than 9,000 customers throughout its service territories. LTD has been declared a provisional winner for the FCC's CAF Phase II auction, and continues to push its coverage area boundaries into extremely rural areas that have been left behind in the digital divide.

LTD's focus is to provide quality communications services to its customers at a reasonable price, and LTD is particularly in tune with the communications needs of Americans in extremely rural areas. LTD's service area has an average population density of 1.64 subscribers per route mile throughout the entire service area. With this insight, LTD plans to utilize the CAF Phase II support in the Funded Areas as a particularly important source of funding, because it focuses on areas that are fundamentally similar to LTD's incumbent service territory. The individuals who benefit from CAF Phase II support will now be able to stay connected to the world as well as access critical public safety, health, educational, and economically advantageous Internet-enabled services and applications.

¹⁹ Applicable Minnesota Administrative Rules include: Records and Reports; Customer Relations; Customer Billing, Deposit and Guarantee Requirements; Disconnection of Service, Service Delay; Directories; Engineering; and Inspections, Tests, Service Requirements.

Accordingly, it is in the public interest to designate LTD as an ETC in the CAF Phase II Funded Areas. Once the Commission grants LTD's ETC application and the FCC approves LTD for funding, the Company will receive \$1,104,440.80 over a ten-year period which it will use "as intended" to provide 25/3 Mbps broadband to those residing and working in the Funded Areas.

V . Conclusion

LTD requests that the Commission grant this application expeditiously without a hearing if no interested party has requested a hearing on this application after receiving at least twenty (20) days' notice of opportunity to request such a hearing.

Dated this 22nd day of October, 2018. LTD Broadband LLC.

Attachments

A rectangular box containing a handwritten signature in dark ink. The signature is cursive and appears to read "Corey Hauer".

By: Corey Hauer, CEO

Exhibit A

CAF II LTD Broadband Awarded Census Blocks

CENSUS BLOCK	EXCHANGE	CENSUS BLOCK	EXCHANGE
270190901004033	WATERTOWN	270370615011013	LAKEVILLE
270190901004042	WATERTOWN	270370615011016	LAKEVILLE
270190907013036	VICTORIA	270370615011029	LAKEVILLE
270190907021001	MINNEAPOLIS/ST. PAUL	270370615011031	FARMINGTON
270190908001011	VICTORIA	270370615011031	LAKEVILLE
270190908001014	VICTORIA	270370615011032	FARMINGTON
270190908001015	VICTORIA	270370615011032	LAKEVILLE
270190908001028	VICTORIA	270370615011046	FARMINGTON
270190909003008	CHASKA	270399501001007	W CONCORD
270370603011019	ST. PAUL	270399501001007	WANAMINGO
270370603011022	ST. PAUL	270399501001072	W CONCORD
270370603011030	ST. PAUL	270399501001076	W CONCORD
270370604021001	ST. PAUL	270399501001090	W CONCORD
270370604021009	ST. PAUL	270399501001095	W CONCORD
270370605081010	ST. PAUL	270459601001067	CHATFIELD
270370606041046	ST. PAUL	270459601001092	FOUNTAIN
270370606051031	ST. PAUL	270459603001058	SPRING VALLEY
270370606051039	ST. PAUL	270459603001072	SPRING VALLEY
270370607162009	ST. PAUL	270459603004068	SPRING VALLEY
270370607172014	ST. PAUL	270459604004025	PRESTON
270370607172021	ST. PAUL	270459604004077	SPRING VALLEY
270370607172024	ST. PAUL	270459604004113	CHERRY GRV
270370607172039	ST. PAUL	270459605001014	CHERRY GRV
270370607253026	MINNEAPOLIS	270459605001014	NORTH CHESTER
270370607253026	MINNEAPOLIS	270459605001014	SPRING VALLEY
270370607253026	ST. PAUL	270459605001059	CHERRY GRV
270370607262025	ST. PAUL	270459605001062	NORTH CHESTER
270370607451007	BURNSVILLE	270459605001073	LEROY
270370607451007	MINNEAPOLIS	270459605001073	NORTH CHESTER
270370607452002	BURNSVILLE	270459605001123	LEROY
270370607481032	MINNEAPOLIS	270459605001123	NORTH CHESTER
270370608203023	LAKEVILLE	270459605001124	NORTH CHESTER
270370611082023	HASTINGS	270459605002071	PRESTON
270370614012015	HASTINGS	270490803002062	LAKE CITY
270370615011004	LAKEVILLE	270490803002069	LAKE CITY
270370615011009	LAKEVILLE	270490803002088	LAKE CITY
270370615011011	LAKEVILLE	270490804001121	CANNON FLS
270370615011012	LAKEVILLE	270490804002013	RED WING

270490805002006	CANNON FLS	271034801002108	NEW SWEDEN
270677804002080	WILLMAR	271034801002117	LAFAYETTE
270677804002081	WILLMAR	271034801002122	LAFAYETTE
270677806003089	WILLMAR	271034801002122	NEW SWEDEN
270799501002071	MONTGOMERY	271034801002123	NEW SWEDEN
270799501002086	MONTGOMERY	271034801002128	LAFAYETTE
270799502001017	LE SUEUR	271034801002130	LAFAYETTE
270799502002024	LE SUEUR	271034801002130	NICOLLET
270799502003016	LE SUEUR	271034801002134	LAFAYETTE
270799502004035	LE SUEUR	271034801002134	NEW SWEDEN
270799502004046	LE SUEUR	271034801002134	NICOLLET
270935601001078	LITCHFIELD	271034801002138	LAFAYETTE
270935601001124	COKATO	271034801002139	LAFAYETTE
270935601001136	COKATO	271034801003114	FAIRFAX
270935601001164	DASSEL	271034802001014	LAFAYETTE
270935601002051	COKATO	271034802001014	NEW SWEDEN
270935601002051	DASSEL	271034802001017	NEW SWEDEN
270935601002093	DASSEL	271034802001029	NEW SWEDEN
270935602001001	LITCHFIELD	271034802001032	NEW SWEDEN
270935602001011	LITCHFIELD	271034802001033	NEW SWEDEN
270935602001035	LITCHFIELD	271034802001035	NEW SWEDEN
270935602004077	LITCHFIELD	271034802001038	NEW SWEDEN
270935602004094	LITCHFIELD	271034802001039	NEW SWEDEN
270935602004113	LITCHFIELD	271034802001041	NEW SWEDEN
270935605002002	LITCHFIELD	271034802001043	NEW SWEDEN
270935605002018	LITCHFIELD	271034802001044	NEW SWEDEN
270935605002025	LITCHFIELD	271034802001046	NEW SWEDEN
270935605002027	LITCHFIELD	271034802001047	NEW SWEDEN
270935605002063	GROVE CITY	271034802001048	NEW SWEDEN
270935605002063	LITCHFIELD	271034802001052	NEW SWEDEN
270935605002082	GROVE CITY	271034802001052	NICOLLET
270935605002106	GROVE CITY	271034802001059	NEW SWEDEN
270935605002115	LITCHFIELD	271034802001071	NEW SWEDEN
270935605002126	LITCHFIELD	271034802001071	NICOLLET
270935605004135	LITCHFIELD	271034802001072	NEW SWEDEN
270935605004169	LITCHFIELD	271034802001073	NEW SWEDEN
270935605004184	LITCHFIELD	271034802001083	NICOLLET
270935605004185	LITCHFIELD	271034802001119	ST PETER
270935605004189	LITCHFIELD	271034802001141	NEW SWEDEN
270935605004190	LITCHFIELD	271034802001141	NICOLLET
270935605004197	GROVE CITY	271034802001143	NEW SWEDEN
270935605004197	LITCHFIELD	271034802002007	ST PETER
271034801001008	LAFAYETTE	271034802002011	ST PETER
271034801001011	LAFAYETTE	271034802002069	NICOLLET
271034801001011	NICOLLET	271034802002078	NICOLLET
271034801002062	LAFAYETTE	271034802002142	CAMBRIA
271034801002066	LAFAYETTE	271034802002143	CAMBRIA
271034801002067	LAFAYETTE	271034802002146	CAMBRIA

271034802002147	CAMBRIA	271390803012067	MINNEAPOLIS/ST. PAUL
271034802002148	CAMBRIA	271390805001013	MINNEAPOLIS/ST. PAUL
271034802002154	CAMBRIA	271390807002001	CHASKA
271034802002155	CAMBRIA	271390807002001	MINNEAPOLIS/ST. PAUL
271034802002157	CAMBRIA	271390807002006	MINNEAPOLIS/ST. PAUL
271034802003008	LE SUEUR	271390807002025	MINNEAPOLIS/ST. PAUL
271034802003023	LE SUEUR	271390808003009	JORDAN
271034802003036	NEW SWEDEN	271390808003009	MINNEAPOLIS/ST. PAUL
271034802003053	ST PETER	271390808003012	MINNEAPOLIS/ST. PAUL
271034802003097	NEW SWEDEN	271390808003024	MINNEAPOLIS/ST. PAUL
271034802003097	ST PETER	271390808003029	JORDAN
271034802003160	ST PETER	271390808003029	MINNEAPOLIS/ST. PAUL
271034802003246	ST PETER	271390808003068	JORDAN
271034802004056	CAMBRIA	271390808003100	JORDAN
271034802004064	CAMBRIA	271390808003109	JORDAN
271034802004065	CAMBRIA	271390809031089	MINNEAPOLIS/ST. PAUL
271034804001026	ST PETER	271390809033012	MINNEAPOLIS/ST. PAUL
271090019002076	ROCHESTER	271390813001060	LE SUEUR
271090019002091	ROCHESTER	271390813002003	JORDAN
271090020001095	CHATFIELD	271390813002004	JORDAN
271090022002032	STEWARTVILLE	271390813002017	JORDAN
271090022002128	STEWARTVILLE	271390813002018	BELLE PLAINE
271090022003045	ROCHESTER	271390813002018	JORDAN
271090022003071	ROCHESTER	271390813002022	BELLE PLAINE
271277501002005	REDWOOD FALLS	271390813002022	JORDAN
271277501002020	REDWOOD FALLS	271390813002023	BELLE PLAINE
271277501002036	REDWOOD FALLS	271390813002023	JORDAN
271277502001126	REDWOOD FALLS	271390813002034	BELLE PLAINE
271277502001138	REDWOOD FALLS	271390813002034	JORDAN
271277504002121	LAMBERTON	271390813002039	BELLE PLAINE
271277504002127	LAMBERTON	271390813002043	JORDAN
271277504002128	LAMBERTON	271390813002044	JORDAN
271277504002132	LAMBERTON	271390813002045	JORDAN
271277506001028	LAMBERTON	271390813002046	JORDAN
271277506001224	LAMBERTON	271390813002047	JORDAN
271310703001033	FARIBAULT	271390813002051	BELLE PLAINE
271310704001062	FARIBAULT	271390813002059	BELLE PLAINE
271310706022002	NORTHFIELD	271390813002059	JORDAN
271310707001000	FARIBAULT	271390813002060	BELLE PLAINE
271390802011003	MINNEAPOLIS	271390813002060	JORDAN
271390802011003	MINNEAPOLIS	271390813002065	BELLE PLAINE
271390802011003	MINNEAPOLIS/ST. PAUL	271390813002065	JORDAN
271390803011002	MINNEAPOLIS/ST. PAUL	271390813002085	BELLE PLAINE
271390803011069	MINNEAPOLIS/ST. PAUL	271390813003069	BELLE PLAINE
271390803012018	MINNEAPOLIS/ST. PAUL	271431703001098	GAYLORD
271390803012019	MINNEAPOLIS/ST. PAUL	271431703001099	GAYLORD
271390803012020	MINNEAPOLIS/ST. PAUL	271431703001178	GAYLORD
271390803012022	MINNEAPOLIS/ST. PAUL	271431703001213	GAYLORD

271450102001012	ST CLOUD	271450113024015	COLD SPRING
271450102001046	ST CLOUD	271450113041060	ST CLOUD
271450102001075	ST CLOUD	271450113041067	ST CLOUD
271450102001076	ST CLOUD	271450113041072	ST CLOUD
271450102002037	ST CLOUD	271450113041075	ST CLOUD
271450102003022	ST CLOUD	271450113041076	ST CLOUD
271450102003045	ST JOSEPH	271450113041081	ST CLOUD
271450102003078	ST JOSEPH	271450113041114	ST CLOUD
271450102003120	ST JOSEPH	271450113041129	ST CLOUD
271450104011069	AVON	271450113041154	ST CLOUD
271450104012040	AVON	271450113041156	ST CLOUD
271450104031101	HOLDINGFORD	271450113041166	ST CLOUD
271450104032028	HOLDINGFORD	271450113041176	COLD SPRING
271450112001005	COLD SPRING	271450113041176	ST CLOUD
271450112001005	ST CLOUD	271450113041180	ST CLOUD
271450112001033	COLD SPRING	271450113041189	ST CLOUD
271450112004021	ST CLOUD	271450114001061	ST CLOUD
271450113012008	ST JOSEPH	271450114001067	ST CLOUD
271450113012125	ST JOSEPH	271450114001078	ST CLOUD
271450113021033	COLD SPRING	271450114001079	ST CLOUD