

September 1, 2020

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

RE: **Comments of the Minnesota Department of Commerce**
Docket No. P999/PR-20-8

Dear Mr. Seuffert:

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

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

Sincerely,

/s/ JOY GULLIKSON
Telecommunications Analyst

/s/ DIANE DIETZ
Telecommunications Analyst

JG/DD/ja
Attachment

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**COMMENTS OF THE DEPARTMENT OF COMMERCE REGARDING
ETC RECERTIFICATION**

Docket No. P999/PR-20-8

I: INTRODUCTION

Each year, the Minnesota Public Utilities Commission (Commission) must certify that Eligible Telecommunications Carriers (ETCs) receiving High Cost Funds are using the funds received in the previous year (2019), and will use the funds in the coming year (2021), only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.¹

In 2019, the Universal Service Administrative Company (USAC) distributed \$250,157,654 to Minnesota ETCs to mitigate high costs in the provision of voice and broadband services. Under several of the high cost schemes, companies must build out to a number of locations in given census blocks.² Each year, through the required filing of FCC Form 481, companies receiving high cost funds³ report certain information, including an affidavit that the company meets certain FCC requirements. The Minnesota Commission requires each company seeking certification to include a separate affidavit from a company officer confirming that funds are used appropriately.

This year, companies filed 107 reports, with each report representing a specific Study Area Code (SAC). Some companies have more than one SAC. Of the 107 reports, four were from companies that have never filed ETC recertifications.⁴ An additional 2 new SACs were filed from companies that had previously received ETC certification, each for different geographic areas. The companies that are to be recertified are listed on the protected USAC certification page and recreated as Attachment 1 to this report. One company listed is no longer an ETC: Lake County relinquished its ETC status through Docket No. P6944/RL-19-195.

2: STATEMENT OF ISSUES

For each ETC, the Minnesota Commission has a binary choice: either approve the company's recertification or deny it. If the Commission approves, the ETC will receive funding in the program year (2021). If the Commission denies ETC recertification for a company, that company will not receive funding. The decision to approve is based upon a number of factors, as enumerated in 47 C. F. R. part 54 and Minnesota Rules and statutes, and the Commission

¹ 47 CFR § 54.314 (a).

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

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

⁴ Those companies not filing 481s prior to this year are: Broadband Corp., Jaguar Communications, LTD Broadband Inc., and Roseau Electric Cooperative.

may wish to approve recertification this year, but order additional information to be filed in future years, if the Commission determines any of the factors caused concern.

The issues the Department of Commerce (Department) examined regarding compliance with ETC requirements include:

- A. Are the locations listed by companies receiving funds that rely on specific location deployment sufficiently accurate?
- B. Whether the companies serving Tribal Lands provided enough evidence of proactive engagement, as required by 47 C. F. R. § 54.313 (5).
- C. Whether high cost fund recipients are appropriately offering and advertising Lifeline services in their locations pursuant to 47 C. F. R. § 54.405.
- D. Whether the Commission wishes to certify the Companies whose SACs are registered in a state other than Minnesota, but who have customers within Minnesota.

The ultimate issue before the Commission is whether the Commission has sufficient documentation through the FCC form 481 filings to be assured that the high cost funds received by each ETCs have been, and will be, used for their intended purpose, pursuant to 47 C.F.R. § 54.314.

3: RELEVANT HISTORICAL BACKGROUND

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

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

On April 11, 2014, in Docket No. P999/PR-14-08, the Minnesota Commission issued an Order modifying the schedule for future annual certifications as follows:

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

On July 7, 2017, for implementation in the July 1, 2018 and future 481 filings, the FCC released an Order simplifying annual reporting requirements for ETCs receiving high-cost support. These changes eliminated the following information that was being collected: 1) network outage information; 2) unfulfilled service requests; 3) number of complaints per 1,000 subscribers for voice and broadband services; 4) voice and broadband service rates; and 5) the requirement for ETCs to certify compliance with service quality standards.⁵ The FCC also ordered that ETCs did not have to file directly with the state commissions, but the reports are available for states to download from the USAC website.

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

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

As part of the 2019 ETC certification process, the Minnesota Commission ordered: “[b]eginning in 2020, companies must electronically file with the Commission their FCC Form 481 filings under 47 C.F.R. 54.313, along with the affidavit required in Docket No. P-999/PR-18-8.”

This last year (2019) marked the first year that some companies received high cost funds from the FCC. Broadband Corporation (SAC 369043) received \$14,271, Jaguar Communications (SAC 369038) received \$25,529, LTD Broadband received \$18,407, and Roseau Electric (SAC 369045) received \$121,437.

⁵ *Report and Order*. In the Matter of Connect America Fund ETC Annual Reports and Certifications. WC Docket No. 10-90, WC Docket No. 14-58. Released July 7, 2017.

3: DISCUSSION OF LAW AND POLICY

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

47 U.S.C. § 214 (e) (2) states:

Designation of eligible telecommunications carriers A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1)⁶ as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

Congress stated that only ETCs can receive Federal universal support. Section 254(e) of the Telecommunications Act states:

After the date on which Commission [FCC] regulations implementing this section take effect, only an eligible telecommunications carrier designated under Section 214(e) shall be eligible to receive specific Federal universal support. A carrier that receives such support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Any such support should be explicit and sufficient to achieve the purposes of this section.

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

Further, States may enact regulations in addition to the FCC's regulations. 47 U.S.C. § 214 (f) (2) states:

A State may adopt regulations not inconsistent with the Commission's rules to preserve and advance universal service. Every telecommunications carrier that provides intrastate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, in a manner determined by the State to the preservation and advancement of universal service in that State. A State may adopt regulations to provide for additional definitions and standards to preserve and advance universal service within that State only to the extent that such regulations adopt additional specific, predictable, and sufficient mechanisms to support such definitions or standards that do not rely on or burden Federal universal service support mechanisms.

Thus, the state may enact regulations that require ETCs to act in a manner that protects consumers and otherwise safeguards the use of federal funds. Whether or not providers act under the auspices of a state issued Certificate of Authority or receive their ability to provide service under an ETC designation alone, this Minnesota Commission can enact regulations that limit the behavior of companies receiving high cost funds. The FCC recognized the authority of states to enact regulations in its November 18, 2011 Order, FCC 11-161:

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

In a more recent Order, the FCC again recognized the role of the States as “primarily responsible for designating ETCs.”⁷

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

⁷ See. *FCC Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking*. FCC 19-111, paragraph 28, Released November 14, 2019.

- The carrier is able to function in emergency situations, per §54.202(a)(2).
- The carrier's voice service is no more than two standard deviations above the applicable national average urban rate for voice service (\$51.61).
- Pricing of broadband service that meets the FCC's public interest obligations is no more than the applicable benchmark.
- Holding company and operating company identification.
- To the extent the recipient serves Tribal lands, documents or information demonstrating that the ETC had discussions with Tribal governments that, at a minimum, included:
 - A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
 - Feasibility and sustainability planning;
 - Marketing in a culturally sensitive manner;
 - Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
 - Compliance with Tribal business and licensing requirements.
- The results of network performance tests pursuant to the methodology and in the format determined by the Wireline Competition Bureau.⁸

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

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

47 C.F.R §54.405, titled "Carrier Obligations to Offer Lifeline," provides:

All eligible telecommunications carriers must:

- (a) Make available Lifeline service, as defined in §54.401, to qualifying low-income consumers.
- (b) Publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

⁸ The network performance test methodology is behind schedule, and the FCC delayed this requirement until the second half of 2020, so no test results were provided in 2019.

(c) Indicate on all materials describing the service, using easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. For the purposes of this section, the term “materials describing the service” includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms.

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

In section 254(f), Congress expressly permitted States to take action to preserve and advance universal service, so long as not inconsistent with the Commission’s universal service rules. The federal statute permits States to adopt additional regulations to preserve and advance universal service so long as they also adopt state mechanisms to support those additional substantive requirements. Consistent with this federal framework, State commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the statute and our implementing regulations, so long as those additional reporting requirements do not create burdens that thwart achievement of the universal service reforms set forth in this Order.

4: SUMMARY OF HIGH COST SUPPORT FUNDS

The FCC, through the Universal Access Corporation (USAC)⁹, disburses money to companies through 20 different funds. In Minnesota in 2019, USAC disbursed \$250,157,654 from ten different funds. These funds were distributed through the following programs, ranked from most dollars distributed to least (plans with \$0 distributed in Minnesota are excluded from this list).

⁹ USAC distributes and manages all the universal service funds mandated by the FCC.

Plan	Abbrev.	Amount Disbursed in MN in 2019
Connect America Cost Model	CACM	85,622,880
Alternative Connect America Model	ACAM	66,216,232
Alternative Connect America Model II	ACAM II	43,138,423
Connect America Fund Broadband Loop Support	BLS	22,063,339
Connect America Fund Intercarrier Compensation	ICC	18,224,958
High Cost Loop	HCL	11,902,332
Connect America Fund Phase II Auction	CAF II Auc	1,955,255
Frozen High Cost Support	FHCS	1,371,760
Interstate Common Line Support	ICLS	892,975
Rural Broadband Experiment	RBE	<u>(1,230,500)¹⁰</u>
		250,157,654

An explanation of each fund is included in Appendix A

5: DISCUSSION OF ISSUES

A. Are the locations listed by companies receiving funds that rely on specific location deployment sufficiently accurate?

The accuracy of served locations by reporting companies was a concern raised in the 2019 recertification proceeding, and concerns raised then continue with the current recertification proceeding. In addition to the question over the accuracy of reporting, both Frontier and CenturyLink have notified USAC that they are in danger of falling short of their 2019 location commitments. If companies fall short of their location commitments, they may be required to return funds. If funds must be returned to USAC, they were clearly not being used in the manner intended. To the extent that an ETC fails to serve the required number of locations, or

¹⁰ Only 2 companies received RBE funds in MN in 2019: Paul Bunyan, Federated. The negative amount is largely the result of funds returned by Lake County dba Lake Connections, after it relinquished its ETC status.

inaccurate location information results in funds being returned to USAC, it is consumers, and in particular rural consumers, who suffer the consequences.

The accuracy of reporting location information by the Frontier companies was recently before this Commission as a part of this 20-8 docket, in response to a Frontier customer complaint regarding his home address being misrepresented on the USAC Broadband map.¹¹ In addition to reviewing the consumer complaint, the Department had spent several months examining the filings of Frontier and concluded that there were many instances in which Frontier had misrepresented addresses in contravention to the intention and requirements of the FCC. Along with other recommendations, the Department requested that the Commission order:

- . . . Frontier to review its HUBB data for those locations it has identified as served with CAF II funds, eliminating all invalid locations, and providing for one location per pair of latitude/longitude points for all but multi-tenant locations. Frontier should then file the correction to the HUBB.
- Require Frontier to provide a listing of all eliminated locations and an accurate reporting of the locations, that are actually served, within 60 days.¹²

The Commission did not adopt the Department's recommendations but chose to have its Executive Secretary send a letter to USAC requesting that USAC audit Frontier's use of CAF II locations.¹³

Although the Department hopes that some progress will be made in the communications occurring between the Executive Secretary and USAC, the Department continues to believe Frontier should be required to correct its HUBB data base to remove repeat USPS addresses and create unique postal or directional addresses for each Latitude and Longitude reported.

The Department has not sufficiently analyzed the location data of carriers, other than Frontier, to make a recommendation on improving the accuracy of location information.

B. Whether the companies serving Tribal Lands provided enough evidence of proactive engagement, as required by 47 C. F. R. § 54.313 (5).

ETCs are required to demonstrate that they have engaged with Tribal governments, that at a minimum includes: (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,

¹¹ <https://data.usac.org/publicreports/caf-map/>

¹² <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={E0402D71-0000-CF1F-80C0-9F851240B59A}&documentTitle=20203-161594-01>

¹³ See Attachment 2.

facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements.¹⁴

In its report in Docket 19-8, the Department stated that it intends to work with each of the companies that serve Tribal lands to attempt to create a better method of Tribal engagement than currently exists. The Commission then formalized in its Order that the companies serving Tribal lands need to fully cooperate with both the Department and the Commission as well as with the Tribes to comply with Section 54.313(a)(9), using FCC Form 481 to ensure acceptable Tribal engagement occurs in the future.

In January of 2020, the Commission Tribal Liaison and the Department Tribal Liaison worked with the Minnesota Telecom Alliance (MNTA) to invite Minnesota telephone companies to a meeting to discuss Tribal engagement in telecommunications. At the meeting, in Sebeka, Minnesota, the Department Tribal Liaison explained the requirements of the FCC, provided some background information and discussed the need for the companies to find the right person to communicate with within the Tribal leadership, and offered assistance in setting up meetings. Following that initial meeting, the Department Tribal Liaison, working with MNTA, created a contact list for each company with the name, telephone number, and email address for the best contact person in each tribe. The intent was for each of the companies serving tribal lands to meet with the tribes, with assistance provided by the Tribal Liaisons, if necessary. Unfortunately, in March of this year, the COVID-19 Pandemic began, and planned visits needed to be curtailed.

On May 8, 2020, the Department sent a letter to the ETCs serving Tribal areas, asking for an update on company efforts to engage Tribal entities, as envisioned by the FCC, per the instructions concerning the 481 filing. The Department had responses from some, but not all companies. It appears that while the telephone companies were willing to properly fulfill their tribal engagement obligations, some, but not much progress was made in having meaningful meetings, due to the pandemic.

The responses filed in this year's FCC Form 481 filings showed no improvement in Tribal engagement over the previous year, although the reporting period was for a time prior to the Department and Commission's Tribal Liaison efforts. The Department recommends that the Commission order continuing cooperation with the Commission and Department, to assist with creating meaningful engagement.

¹⁴ 47 C.F.R. § 54.313(a)(5); see also *Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Telecommunications Bureau Issue Further Guidance on Tribal Government Engagement Obligation Provisions of the Connect America Fund*, WC Docket Nos. 10-90 et al., 27 FCC Rcd 8176 (2012).

C. Whether high cost fund recipients are appropriately offering and advertising Lifeline services in their locations pursuant to 47 C. F. R. § 54.405.

Pursuant to 47 C. F. R. § 54.405, All ETCs must make Lifeline service available to qualifying low income consumers and must publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. The 481 form, line 1210, requires either a document describing the terms and conditions of voice telephony Lifeline service, or a link to a public website that describes those terms and conditions. A well set up website, while not the only way to publicize the availability of Lifeline, is clearly an effective way to reach many potential customers. However, if a reasonable consumer cannot find the appropriate web page, the offering is of little value and the carrier is not complying with ETC requirements.

In Minnesota 8,524 non-tribal households receive Lifeline service from ETCs that also receive high cost funds; 6750 of those households apply Lifeline to voice. An additional 95 households residing in Indian Country receive Lifeline service from ETCs that also receive high cost funds; 75 of those households apply Lifeline to voice.

The Department looked at the websites of every ETC to determine if it is properly advertising Lifeline. The majority of the company web pages are not easy to access, even if they contain the appropriate information. An illustrative case is Arvig, which has one website for thirteen ETCs. In each of the thirteen 481 filings, the following address was offered in response to line 1210: www.arvig.com/phone-assistance. However, when the Department attempted to use this address, it produced an error message. In response to a request, Arvig offered another link: www.arvig.net/Minnesota-telephone-assistance-plan-lifeline. This latter address does offer information on how to apply for Lifeline, but the path to that particular page from either the Arvig.com or the Arvig.net addresses is not clear. Consideration should be given on whether customers should be able to reach the web page describing Lifeline within 2 clicks, or some other number the Commission deems reasonable, from the main page. If fewer clicks are required, the path is more likely to be apparent to a reasonable person.

Three of the companies not previously receiving high cost funds currently offer no Lifeline service: Jaguar, LTD Broadband, and Roseau Electric. LTD Broadband and Roseau electric have not yet built out their networks, and have until 2023 or 2022, respectively, to make their first milestone. Jaguar did not respond to the Department's information request.

The Department would like to recognize Garden Valley Telephone Company as an excellent example of how to offer Lifeline service. The website, www.gvtel.com has seven slides on its main page that rotate. The first slide concerns COVID-19 Assistance Plans and Updates, the second is for Assistance Plans, where it outlines Minnesota's Telephone Assistance Plan, the Federal Lifeline program, and Garden Valley's internet assistance offers.

D. Whether the Commission wishes to certify the Companies whose SACs are registered in a state other than Minnesota, but who have customers within Minnesota.

Some SACs serve Minnesota customers, but are registered to be certified in other states. The following SACs serve Minnesota customers, but are registered in other states and will be certified in those states.

SAC	Carrier Name	Certifying State
391405	Alliance Comm Coop - Hills Tel Coop	South Dakota
391657	Alliance Comm Coop - Splitrock	South Dakota
351126	CenturyTel of Chester	Iowa
330950	CenturyTel of NW Wisc	Wisconsin
361401	Halstad Telephone Co	North Dakota
361443	Loretel Systems	North Dakota
381630	Polar Comm Mutual Aid Corp	North Dakota
381614	Polar Telecomm	North Dakota

The Department has confirmed with the Commission Staff in North Dakota, Iowa, and South Dakota, that the above listed companies will be certified by the Commissions in those states. In the past, the Minnesota Commission has certified these companies and no harm has come from it. Because the Department has confirmed the intent of the state Commissions to certify these companies, the Department recommends recertification of these companies.

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

With fewer than 60 days available for it to analyze 107 SACs, the Department has limited means to investigate and provide the Commission with assurance that high cost funds have been, and will be, used for their intended purpose. Therefore, the Department focused its efforts on encouraging companies to reach out effectively to Tribal leaders, examining the locations of Frontier, and reviewing the level of Lifeline offerings and the manner of those offerings. The Department has found no reason to deny recertification for any ETC, but as discussed in these comments there are some areas of concern that merit regulatory oversight.

The requirement that ETCs must offer a stand-alone voice product is one that the Department and Commission have covered thoroughly in ETC certifications.¹⁵ In its review of Roseau Electric Company's Lifeline offering, the Department discovered that the price list shows a requirement

¹⁵ See. 47 C.F.R. § 54.201 (b): An eligible telecommunications carrier eligible to receive high-cost support must offer voice telephony

to subscribe to internet service in order to receive voice service. As the services are not yet ready for offering, the erroneous requirement was corrected without customers being negatively affected.

Also, this is the first year where there are two companies seeking ETC recertification, but have not received a certificate of authority from this Commission. As they were not required by this Commission to obtain a certificate of authority, neither Broadband Corporation nor LTD Broadband are required to file tariffs or price lists, and they are not required to comply with the consumer protections afforded by the Commission's rules, including Minn. R. 7810.1100, subp. 3, which requires companies to respond to the Commission within 5 days on complaints. As these companies have not yet deployed network in Minnesota from the high cost funds received, customers have not yet been served and possible concerns with these companies operating differently than what is required by Commission rules has not come to fruition.

6: COMMISSION OPTIONS

A. Are the locations listed by companies receiving funds that rely on specific location deployment sufficiently accurate?

The Commission has the following options:

1. Order Frontier to correct the multiple USPS addresses in its HUBB data base
2. Require all companies to cooperate with the Department's review of location information
3. Make no order regarding locations

B. Have the companies serving Tribal Lands provided enough evidence of proactive engagement, as required by 47 C. F. R. § 54.313 (5).

The Commission has the following options:

1. Order continued cooperation with the Commission and Department in encouraging meaningful engagement
2. Make no order regarding Tribal engagement

C. Are high cost fund recipients appropriately offering and advertising Lifeline services in their locations pursuant to 47 C. F. R. § 54.405.

The Commission has the following options:

1. Order that all ETCs must offer Lifeline services for both voice and broadband in their ETC areas and should seek to provide information concerning Lifeline services on its public website that can be reached within two clicks.
2. Make no order regarding Lifeline offerings

D. Whether the Commission wishes to certify the Companies whose SACs are registered in a state other than Minnesota, but who have customers within Minnesota

The Commission has the following options:

1. Certify the ETC who operate and have their SACs registered in other states but have some operations in Minnesota.
2. Make no order regarding such filings.

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

The Commission has the following options:

1. Recertify the ETC on Attachment I
2. Refuse to recertify some or all of the ETCs

7: RECOMMENDATION

The Department recommends Alternative A1, A2, B1, C1, D1, and E1.

APPENDIX A

Explanation of High Cost Funds Received in Minnesota 2018

Connect America Cost Model (CACM). The Connect America Cost Model, CACM/CAM adopted by the Wireline Competition Bureau on April 22, 2014, for determining the offer of support to **Price Cap**¹⁶ carriers. This is also known as CAF II. CACM is a model that estimates the cost to provide voice and broadband-capable network connections to all locations in the country. CACM provides specific details at the Census Block level, for the forward-looking cost to deploy and operate carrier grade VOIP service and a broadband-capable network and universal service support levels for that voice and broadband-capable network.¹⁷

The CACM fund is a six-year fund that began in 2015 with the award of \$1.5 billion to 10 telecommunications carriers.

In order to receive CAF II funding, carriers must offer at least one voice and one broadband service commercially. These services must meet the relevant service requirements and go to the required number of locations.

Carriers must complete:

- 40 % of deployments by the end of year 3
- 20 % more deployments by the end of year 4
- 20 % more deployments by the end of year 5
- 100 % of deployments by the end of year 6.

Alternative Connect America Model (ACAM). The Alternative Connect America Cost Model (ACAM) provides support to **Rate of Return** carriers that voluntarily elected to transition to a new cost model for calculating High Cost funding. ACAM models forward-looking economic costs of deploying and operating a fiber-to-the-premise (FTTP) network. Carriers must offer at least one voice and one broadband service commercially. These services must meet the relevant service requirements and go to the required number of locations.

Carriers must complete:

- 40% of deployments by the end of year 4
- 50% of deployments by the end of year 5
- 60% of deployments by the end of year 6
- 70% of deployments by the end of year 7
- 80% of deployments by the end of year 8
- 90% of deployments by the end of year 9
- 100% of deployments by the end of year 10

¹⁶ Minnesota has four price cap companies: CenturyLink, Consolidated, Windstream, and Frontier.

¹⁷ Connect America Cost Model, Document 3.1.4 Revised 6/21/2013.

Alternative Connect America Model II. (ACAM II). Established by the 2018 Rate-of-Return Reform Order, the Alternative Connect America Cost Model (ACAM) II provides funding to rate-of-return carriers that voluntarily elected to transition to a new cost model for calculating High Cost support in exchange for meeting defined broadband build-out obligations. Carriers that elected this option receive predictable monthly payments based on support of up to \$200 for each funded location over the program's 10-year support term (2017-2026). (Carriers electing ACAM II support receive transition payments if their ACAM II support is less than their 2018 legacy support.) Participating carriers must meet annual deployment milestones starting in year four, 2022.

Connect America Fund Broadband Loop Support (BLS) Connect America Fund Broadband Loop Support (CAF BLS) provides support for broadband-only lines, as well as voice lines and voice/broadband lines. It helps carriers recover the difference between loop costs associated with providing broadband-only service and consumer broadband-only loop revenues.

CAF BLS was formerly Interstate Common Line Support or ICLS.

Connect America Fund Intercarrier Compensation (ICC). The Intercarrier Compensation (ICC) Recovery is the component of the Connect America Fund that introduces reforms to the intercarrier compensation system. ICC Recovery support went into effect in July 2012, and allows incumbent local exchange carriers (ILECs) to charge residential customers an Access Recovery Charge (ARC) on a limited basis. It also allows ILECs to recover charges from certain multiline business customers. If eligible, ILECs may receive additional recovery funds, provided they meet certain broadband service obligations.

HIGH COST LOOP SUPPORT (HCL). High Cost Loop (HCL) support is available to rural price-cap and rate-of-return incumbent carriers and competitive carriers providing service in the areas of these rural companies, which must be designated as ETCs. HCL support provides support for the last mile of connection for rural companies in service areas where the cost to provide this service exceeds 115 percent of the national average cost per line. ROR carriers have updated limits on capital and operating costs for HCL support and updated corporate operating expense limits for HCL support as well as ICLS.

Connect America Fund Phase II Auction (CAF II Auction). provides support to carriers to deliver service in areas where the incumbent price cap carrier didn't accept CAF Phase II model-based funding and in extremely high-cost areas located within the service areas of the incumbent price cap carriers. After a reverse auction bidding process (Auction 903) completed in 2018, the FCC awarded a total of \$1.49 billion over 10 years to more than 100 winning bidders to provide fixed broadband and voice services to over 700,000 locations in 45 states.

Frozen High Cost Support (FHCS). With the advent of the Connect American Fund, existing High Cost Program support was frozen at December 2011 levels and additional changes were made to existing programs to transition universal service from focusing on voice networks to supporting and expanding broadband availability

Rural Broadband Experiment (RBE). The Rural Broadband Experiments (RBE) provides funding for experiments in price-cap areas to bring robust, scalable broadband networks to residential and small business locations in rural communities.

**LIST OF STUDY AREA CODES (SACs) TO BE CERTIFIED BY MINNESOTA PUBLIC UTILITIES
COMMISSION FOR YEAR 2020**

SAC	Carrier Name	State	Carrier Certified	Certified	
			Type	In 2019?	In 2020?
361346	ACE TEL ASSN-MN	1-MN	ILEC	Yes	No
361347	ALBANY MUTUAL ASSN	2-MN	ILEC	Yes	No
361374	ARROWHEAD COMM CORP	3-MN	ILEC	Yes	No
361350	ARVIG TEL CO	4-MN	ILEC	Yes	No
361356	BENTON COOP TEL CO	5-MN	ILEC	Yes	No
361358	BLUE EARTH VALLEY	6-MN	ILEC	Yes	No
361362	BRIDGEWATER TEL CO	7-MN	ILEC	Yes	No
369043	Broadband Corp	8-MN	CETC	No	No
361365	CALLAWAY TEL CO	9-MN	ILEC	Yes	No
361440	CANNON VLY TELECOM	10-MN	ILEC	Yes	No
351126	CENTURYTEL-CHESTER	11-IA	ILEC	Yes	No
361445	CENTURYTEL-MINNESOTA	12-MN	ILEC	Yes	No
330950	CENTURYTEL-NW WI	13-WI	ILEC	Yes	No
361425	CHRISTENSEN COMM CO	14-MN	ILEC	Yes	No
361123	CITIZENS-FRONTIER-MN	15-MN	ILEC	Yes	No
367123	CITIZENS-FRONTIER-MN	16-MN	ILEC	Yes	No
361353	CITY OF BARNESVILLE	17-MN	ILEC	Yes	No
361370	CLARA CITY TEL EXCH	18-MN	ILEC	Yes	No
361372	CLEMENTS TEL CO	19-MN	ILEC	Yes	No
361373	CONSOLIDATED TEL CO	20-MN	ILEC	Yes	No
369044	Consolidated Telephone Company	21-MN	CETC	Yes	No
361499	CROSSLAKE TEL CO	22-MN	ILEC	Yes	No
361381	DUNNELL TEL CO	23-MN	ILEC	Yes	No
361383	EAGLE VALLEY TEL CO	24-MN	ILEC	Yes	No
361385	EAST OTTER TAIL TEL	25-MN	ILEC	Yes	No
361384	EASTON TEL CO	26-MN	ILEC	Yes	No
361386	ECKLES TEL CO	27-MN	ILEC	Yes	No
361456	EMBARQ MINNESOTA	28-MN	ILEC	Yes	No
361387	EMILY COOP TEL CO	29-MN	ILEC	Yes	No
361389	FARMERS MUTUAL TEL	30-MN	ILEC	Yes	No

361390	FEDERATED TEL COOP	31-MN	ILEC	Yes	No
366130	Federated Telephone Cooperative	32-MN	CETC	Yes	No
361403	FEDERATED UTILITIES	33-MN	ILEC	Yes	No
361391	FELTON TEL CO. INC.	34-MN	ILEC	Yes	No
361367	FRONTIER-MINNESOTA	35-MN	ILEC	Yes	No
361395	GARDEN VALLEY TEL CO	36-MN	ILEC	Yes	No
369039	Garden Valley Telephone Company	37-MN	CETC	Yes	No
361396	GARDONVILLE COOP TEL	38-MN	ILEC	Yes	No
361399	GRANADA TEL CO	39-MN	ILEC	Yes	No
361401	HALSTAD TEL CO	40-MN	ILEC	Yes	No
369040	Halstad Telephone Company	41-MN	CETC	Yes	No
361404	HARMONY TEL. CO.	42-MN	ILEC	Yes	No
361405	HILLS TEL CO, INC	43-MN	ILEC	Yes	No
391405	HILLS TEL CO-SD	44-SD	ILEC	Yes	No
361408	HOME TEL CO - MN	45-MN	ILEC	Yes	No
361409	HUTCHINSON TEL CO	46-MN	ILEC	Yes	No
361654	INTERSTATE TELECOMM.	47-MN	ILEC	Yes	No
369041	Interstate Telecommunications Cooperative, Inc.	48-MN	CETC	No	No
369038	Jaguar Communication, Inc	49-MN	CETC	No	No
361410	JOHNSON TEL CO	50-MN	ILEC	Yes	No
361412	KASSON & MANTORVILLE	51-MN	ILEC	Yes	No
366110	Lake County d/b/a Lake Connections	52-MN	CETC	Yes	No
361419	LISMORE COOP TEL CO	53-MN	ILEC	Yes	No
361422	LONSDALE TEL CO	54-MN	ILEC	Yes	No
361443	LORETEL SYSTEMS, INC	55-MN	ILEC	Yes	No
369047	LTD Broadband LLC	56-MN	CETC	No	No
361424	MABEL COOP TEL - MN	57-MN	ILEC	Yes	No
361426	MANCHESTER-HARTLAND	58-MN	ILEC	Yes	No
361427	MANKATO-HICKORYTECH	59-MN	ILEC	Yes	No
361430	MELROSE TEL CO	60-MN	ILEC	Yes	No
361413	MID STATE DBA KMP	61-MN	ILEC	Yes	No
361433	MID STATE TEL CO	62-MN	ILEC	Yes	No
361375	MID-COMM-HICKORYTECH	63-MN	ILEC	Yes	No
369015	Midcontinent Communications	64-MN	CETC	Yes	No
361431	MIDWEST TEL CO	65-MN	ILEC	Yes	No

361439	MINNESOTA VALLEY TEL	66-MN	ILEC	Yes	No
361442	NEW ULM TELECOM, INC	67-MN	ILEC	Yes	No
361500	NORTHERN TEL CO - MN	68-MN	ILEC	Yes	No
361448	OSAKIS TEL CO	69-MN	ILEC	Yes	No
361450	PARK REGION MUTUAL	70-MN	ILEC	Yes	No
361451	PAUL BUNYAN RURAL	71-MN	ILEC	Yes	No
366132	Paul Bunyan Rural Telephone Cooperative	72-MN	CETC	Yes	No
366133	Paul Bunyan Rural Telephone Cooperative	73-MN	CETC	Yes	No
361453	PEOPLES TEL CO - MN	74-MN	ILEC	Yes	No
361454	PINE ISLAND TEL CO	75-MN	ILEC	Yes	No
381630	POLAR COMM MUT AID	76-ND	ILEC	Yes	No
381614	POLAR TELECOMM.	77-ND	ILEC	Yes	No
365142	QWEST CORP-MN	78-MN	ILEC	Yes	No
361472	REDWOOD COUNTY TEL	79-MN	ILEC	Yes	No
369045	Roseau Electric Cooperative, Inc.	80-MN	CETC	No	No
361474	ROTHSAY TEL CO, INC	81-MN	ILEC	Yes	No
361475	RUNESTONE TEL ASSN	82-MN	ILEC	Yes	No
361423	Runestone Telephone Association	83-MN	ILEC	Yes	No
361476	SACRED HEART TEL CO	84-MN	ILEC	Yes	No
361479	SCOTT RICE -INTEGRA	85-MN	ILEC	Yes	No
361483	SLEEPY EYE TEL CO	86-MN	ILEC	Yes	No
391657	SPLITROCK TELECOM COOPERATIVE INC.	87-SD	ILEC	Yes	No
361485	SPRING GROVE COOP	88-MN	ILEC	Yes	No
361487	STARBUCK TEL CO	89-MN	ILEC	Yes	No
369014	T-Mobile Central LLC	90-MN	CETC	Yes	No
361491	TWIN VALLEY-ULEN TEL	91-MN	ILEC	Yes	No
361494	UPSALA COOP TEL ASSN	92-MN	ILEC	Yes	No
361495	VALLEY TEL CO - MN	93-MN	ILEC	Yes	No
361501	WEST CENTRAL TEL	94-MN	ILEC	Yes	No
369042	West Central Telephone Association	95-MN	CETC	Yes	No
361502	WESTERN TEL CO	96-MN	ILEC	Yes	No
361505	WIKSTROM TEL CO, INC	97-MN	ILEC	Yes	No
369046	Wikstrom Telephone Company	98-MN	CETC	No	No
361348	WILDERNESS VALLEY	99-MN	ILEC	Yes	No

361414	Windstream Communications, Inc.	100-MN	ILEC	Yes	No
361482	Windstream Communications, Inc.	101-MN	ILEC	Yes	No
361337	WINNEBAGO COOP ASSN	102-MN	ILEC	Yes	No
361507	WINSTED TEL CO	103-MN	ILEC	Yes	No
361508	WINTHROP TEL CO	104-MN	ILEC	Yes	No
361512	WOLVERTON TEL CO	105-MN	ILEC	Yes	No
361510	WOODSTOCK TEL CO	106-MN	ILEC	Yes	No
361515	ZUMBROTA TEL CO	107-MN	ILEC	Yes	No

Attachment 2

DOC Comments

Docket No. P999/PR-20-8

Attached letter is 2 pages.



July 15, 2020

Office of General Counsel
Ernesto Beckford
Universal Service Administrative Company (USAC)
700 12th Street NW
Suite 900
Washington, DC 20005

Dear Mr. Beckford:

The Minnesota Public Utilities Commission (MPUC) requests that USAC initiate an audit of Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC (Frontier).

In December 2019, it came to the MPUC's attention via consumer complaint that there may be some irregularities with Frontier's use of Connect America Phase II (CAF II) funds.

The customer complaint concerns the availability of broadband internet access service (BIAS) at the minimum speed requirements of the Federal Communications Commission (FCC), as represented on the Connect America Fund (CAF) Broadband Map for Frontier. The Frontier customer alleges that the CAF Broadband Map contains inaccuracies about his location and the actual addresses of his neighbors, but also alleges that the internet speeds do not meet the minimum 10 Mbps download and 1 Mbps upload (10/1) speeds for locations funded by the FCC via CAF II.

In order to formally follow-up on this complaint, the MPUC issued its Request for Review and Comment Period in Docket P999/PR-20-8 on January 15, 2020, based on the customer complaint described above. As part of this inquiry, the MPUC forwarded the supporting documents from the customer's complaint to the Minnesota Department of Commerce (MDOC) and the Minnesota Office of the Attorney General-Residential Utilities Division (OAG-RUD) in order to facilitate their investigation of the customer's complaint.

The MDOC and the OAG-RUD ("the Minnesota State Agencies"), concluded that Frontier may not be able to match reported CAF II locations with a customer's desire for high speed broadband internet access service. As part of their conclusion, the Agencies referenced the HUBB database. However, Frontier filed reply comments with the MPUC suggesting the two agencies did not fully understand the relevance of the data in the HUBB database and noted that it recently passed a USAC audit. At MPUC's June 11, 2020 agenda meeting, the

Commission voted unanimously to take no official action at this time and instead directed MPUC's executive secretary to contact USAC.

Different from many other state regulatory structures in this area the Minnesota State Agencies play a significant role in investigating and promoting the public interest in front of the MPUC that is more judicial in nature than other states. Their initial inquiry into this matter is appreciated, but the MPUC and the Minnesota State Agencies defer in large part to the expertise of USAC, as it performs these audits regularly. USAC also would have the expertise to decide whether an audit is warranted, and can report the results of the audit to the FCC, Minnesota State Agencies, and MPUC as appropriate. Additionally, there are compliance items and penalties already established at the federal level if ETCs are not meeting their requirements. We would ask you for a careful review of Frontier's use of these CAF II funds in Minnesota and if warranted conduct Beneficiary and Contributor Audit Program ("BCAP") audit. Through this review and auditing process we request updates for the Minnesota State Agencies as they fulfill their important investigatory function under Minnesota's regulatory paradigm around ETC certification and other state regulatory authority.

For these reasons, MPUC requests that USAC conduct an audit of the use of CAF II funds by Frontier, including both Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC. Please let the MPUC know what course of action USAC determines is most appropriate in this circumstance.

If you have any questions, please contact Marc Fournier at Marc.Fournier@state.mn.us or 651-201-2214, or Michelle Rebholz at Michelle.Rebholz@state.mn.us or 651-201-2206. In addition, should USAC choose to contact either of the Minnesota State Agencies, you may review their comments in our eDockets system under Docket 20-8.

Sincerely,

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission

Cc: Amy Klobuchar (U S Senator)
Tina Smith (U S Senator)
Joy Gullikson (DOC)
Kristin Berkland (OAG-RUD)
Scott Bohler (Frontier)

Equal Opportunity Employer

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. P999/PR-20-8

Dated this **31st** day of **August 2020**

/s/Sharon Ferguson

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Bickett	dave.bickett@parkregion.com	Otter Tail Telecom	PO Box 277 100 Main St Underwood, MN 56586	Electronic Service	No	OFF_SL_20-8_PR-20-8
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_20-8_PR-20-8
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_20-8_PR-20-8
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_20-8_PR-20-8
Jack	Briggs	jbriggs@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Owatonna, MN 55060-2926	Electronic Service	No	OFF_SL_20-8_PR-20-8
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	201 Ross Avenue PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_20-8_PR-20-8
Chad	Bullock	chadb@wcta.net	West Central Telephone Association	308 Frontage Road PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_20-8_PR-20-8
Thomas	Burns	tgburns@otcpas.com	OLSEN THIELEN & CO. LTD	2675 Long Lake Rd Saint Paul, MN 55113	Electronic Service	No	OFF_SL_20-8_PR-20-8
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	OFF_SL_20-8_PR-20-8
Thomas	Campbell	tcampbell@otcpas.com	Olsen Thielen	2675 Long Lake Road St. Paul, MN 55309	Electronic Service	No	OFF_SL_20-8_PR-20-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.	P.O. Box 920 312 Fourth Street Clear Lake, SD 57226	Electronic Service	No	OFF_SL_20-8_PR-20-8
Andrew	Carlson	acarlson@taftlaw.com	Taft Stettinius & Hollister LLP	Suite 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-8_PR-20-8
Jim	Carpenter	jim.carpenter@telrite.com	Telrite Corporation	1110 Alcovy Rd Covington, GA 30014	Electronic Service	No	OFF_SL_20-8_PR-20-8
Danyell	Carroll	danyell.carroll@windstream.com	Talk America, LLC	4001 N Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_20-8_PR-20-8
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_20-8_PR-20-8
Teresa	Crews	tcrews@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	Suite 100 1831 Anne Street Bemidji, MN 56601	Electronic Service	No	OFF_SL_20-8_PR-20-8
Angie	Dickison	angie.dickison@state.mn.us	MN DEED	332 Minnesota St E200 MN DEED St Paul, MN 55101	Electronic Service	No	OFF_SL_20-8_PR-20-8
Donna	Eul	Donna.Eul@Aciracoop.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_20-8_PR-20-8
Donna	Eul	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212	Electronic Service	No	OFF_SL_20-8_PR-20-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_20-8_PR-20-8
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd Columbus, OH 43231-5931	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kari	Flanagan	karif@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	OFF_SL_20-8_PR-20-8
Shari	Flanders	sflanders@polartel.com	Polar Communications	PO Box 270 Park River, ND 58270	Electronic Service	No	OFF_SL_20-8_PR-20-8
Travis	Floyd	travisf@wcta.net	West Central Telephone Assoc	308 Frontage Rd PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_20-8_PR-20-8
Mark	Forseth	markforseth@rrv.net	Halstad Telephone Company	Box 55 345 2nd Ave West Halstad, MN 56548	Electronic Service	No	OFF_SL_20-8_PR-20-8
Julie	Geerdes	jgeerdes@paulbunyan.net	Paul Bunyan Rural Telephone Coop	1831 Anne St. NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_20-8_PR-20-8
Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Assoc	PO Box 304 308 Frontage Rd Sebeka, MN 56477	Electronic Service	No	OFF_SL_20-8_PR-20-8
William	Haas	william.haas@t-mobile.com	T-Mobile Central LLC	2001 Butterfield Rd Suite 1900 Downers Grove, IL 60515	Electronic Service	No	OFF_SL_20-8_PR-20-8
Roxi	Hacker	roxih@interstatetelcom.com	Interstate Telcom Consulting	130 Birch Avenue West Hector, Minnesota 55342	Electronic Service	No	OFF_SL_20-8_PR-20-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1104 19th Ave SW Ste B Willmar, MN 56201	Electronic Service	No	OFF_SL_20-8_PR-20-8
Corey	Hauer	coreyhauer@gmail.com	LTD Broadband LLC	69 Teahouse St Las Vegas, NV 89138	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kim	Haugen	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd AvePO Box 127 Lismore, MN 56155	Electronic Service	No	OFF_SL_20-8_PR-20-8
Donna	Heaston	Donna.Heaston@Allstream.com	Electric Lightwave, LLC (New)	dba Allstream 2800 Campus Dr Ste 140 Plymouth, MN 55441	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kent	Hedstrom	kent@runestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	OFF_SL_20-8_PR-20-8
Bruce	Hegge	manager@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	OFF_SL_20-8_PR-20-8
Pauleen	Hinkley	phinkley@rrv.net	Halstad Telephone Company	345 2nd Ave W PO Box 55 Halstad, MN 56548	Electronic Service	No	OFF_SL_20-8_PR-20-8
Cory	Hoerler	choerler@mhtele.com	Manchester Heartland	204 Railroad St Manchester, MN 56007-5012	Electronic Service	No	OFF_SL_20-8_PR-20-8
Dwayne	Johnson	jtcbusiness@jtc-co.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_20-8_PR-20-8
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-8_PR-20-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-8_PR-20-8
Conrad	Johnson	jtconrad@jtc-co.net	Johnson Telephone Company	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_20-8_PR-20-8
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	OFF_SL_20-8_PR-20-8
Carrie	Kern Taggart	cak@wiktel.com	Wikstrom Telephone Company Inc	212 South Main PO Box 217 Karlstad, MN 56732	Electronic Service	No	OFF_SL_20-8_PR-20-8
Mark	Klinkhammer	klinkham@gvtel.com	Garden Valley Telephone Company	201 Ross Avenue PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	OFF_SL_20-8_PR-20-8
Pat	Knutson	pat.knutson@aciracoop.net	Farmers Mutual Telephone Company	PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_20-8_PR-20-8
Patricia	Knutson	in.another.account.Pat.Knutson@Aciracoop.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Paper Service	No	OFF_SL_20-8_PR-20-8
Julie	Kolka	juliekolka@mabeltel.coop	Mabel Cooperative Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	OFF_SL_20-8_PR-20-8
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	OFF_SL_20-8_PR-20-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Lorenz	Tom.Lorenz@Aciracoop.net	Federated Telephone Cooperative	405 2nd St. E. PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Electronic Service	No	OFF_SL_20-8_PR-20-8
Al	Lundeen	alundeen@wiktel.com	Wikstrom Telephone Company	212 S Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_20-8_PR-20-8
Patrick J	Mastel	pat.mastel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_20-8_PR-20-8
Cassandra	Milligan	cassandra.milligan@tagmobile.com	TAG Mobile, LLC	701 E Plano Pkwy Ste 408 Plano, TX 75074	Electronic Service	No	OFF_SL_20-8_PR-20-8
Todd	Morris	todd.morris@itctel.com	Interstate Telecommunications Coop	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_20-8_PR-20-8
Ann	Morrison	amorrison@fairpoint.com	Consolidated Communications Enterprise Services, Inc./Fairpoint	221 E Hickory St Mankato, MN 56001-3610	Electronic Service	No	OFF_SL_20-8_PR-20-8
Monty	Morrow	montymorrow@nuvera.net	Nuvera	235 Franklin St Hutchinson, MN 55350	Electronic Service	No	OFF_SL_20-8_PR-20-8
Melanie	Nelson	mdnelson@rrv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	OFF_SL_20-8_PR-20-8
Josh	Netland	jnetland@emily.net	Emily Cooperative Telephone Company	PO Box 100 40040 State Hwy 6 Emily, MN 564470100	Electronic Service	No	OFF_SL_20-8_PR-20-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-8_PR-20-8
Chris	Olson	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeka, MN 56477	Electronic Service	No	OFF_SL_20-8_PR-20-8
Paul	Paco Erickson	paco_erickson@mmi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_20-8_PR-20-8
Michelle	Painter	michelle.painter@sprint.com	Virgin Mobile USA, L.P.	12502 Sunrise Valley Dr Reston, VA 20196	Electronic Service	No	OFF_SL_20-8_PR-20-8
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_20-8_PR-20-8
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kristi	Putnam	kristi.putnam@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kris	Rademacher	kriss@farmerstel.net	Farmers Mutual Telephone Co.	301 2nd St S Bellingham, MN 562120369	Electronic Service	No	OFF_SL_20-8_PR-20-8
Brian	Rathman	brian.rathman@telrite.com	Telrite Corporation	2300 Windy Ridge Pkwy Ste 350S Atlanta, GA 30339	Electronic Service	No	OFF_SL_20-8_PR-20-8
Julia	Redman Carter	jrcarter@readywireless.com	Boomerang Wireless LLC	955 Kacena Rd Ste A Hiawatha, IA 52233	Electronic Service	No	OFF_SL_20-8_PR-20-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-8_PR-20-8
Mark	Roach	mark.roach@ctctelcom.net	Consolidated Telephone Company	1102 Madison Street PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_20-8_PR-20-8
Bryan	Roth	Bryan.roth@itctel.com	Interstate Telecommunications Coop.	P.O. Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_20-8_PR-20-8
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_20-8_PR-20-8
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_20-8_PR-20-8
Julie	Serbus	jserbus@mnval.net	Minnesota Valley Telephone Company	PO Box 310 340 2nd Ave E Franklin, MN 55333	Electronic Service	No	OFF_SL_20-8_PR-20-8
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-8_PR-20-8
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_20-8_PR-20-8
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 Lonsdale, MN 55046-0358	Electronic Service	No	OFF_SL_20-8_PR-20-8
Greg	Springer	greg@gocctc.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	OFF_SL_20-8_PR-20-8

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Kimberly	Starr	kim@kclenterprises.net	Dunnell Telephone Company	PO Box 728 Judson, Texas 75660	Electronic Service	No	OFF_SL_20-8_PR-20-8
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_20-8_PR-20-8
Cynthia	Sweet	csweet@acentek.net	Ace Telephone Association	PO Box 360 207 East Cedar Houston, MN 559430360	Electronic Service	No	OFF_SL_20-8_PR-20-8
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	OFF_SL_20-8_PR-20-8
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_20-8_PR-20-8
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	OFF_SL_20-8_PR-20-8
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-8_PR-20-8
Melissa	Tschida	mtschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277 Upsala, MN 56384	Electronic Service	No	OFF_SL_20-8_PR-20-8
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kalsie	Vanasse	kalsiev@paulbunyan.net	Paul Bunyan Rural Telephone Coop	1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_20-8_PR-20-8

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Amy	Vick	amyb@itctel.com	Interstate Telecommunications Coop., Inc.	312 4th St. W. PO Box 920 Clear Lake, SD 57226	Paper Service	No	OFF_SL_20-8_PR-20-8
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_20-8_PR-20-8
Lyle	Waughtal	lyle.waughtal@gvtel.net	Garden Valley Telephone Company - Coop	201 Ross Ave PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_20-8_PR-20-8
Mark	Wegscheid	markw@broadband-mn.com	Broadband Corp.	1772 Steiger Lake Ln Victoria, MN 55386	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kathy	Weitala	kathy.weitala@itctel.com	Interstate Telecommunications Cooperative, Inc..	312 4th Street West Clear Lake, South Dakota 57226	Electronic Service	No	OFF_SL_20-8_PR-20-8
Diane	Wells	diane.wells@state.mn.us	Department of Commerce	Suite 500 85 Seventh Place East St. Paul, MN 55102198	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kristi	Westbrock	Kristi@goctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401-0972	Electronic Service	No	OFF_SL_20-8_PR-20-8
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_20-8_PR-20-8
Mike	Wilker	Mwilker@jagcom.net	Jaguar Communicatoins, Inc.	213 S Oak Ave Owatonna, MN 55060	Electronic Service	No	OFF_SL_20-8_PR-20-8
Anthony	Will	anthonyw@broadband-mn.com	Broadband Corp	585 Hwy 7 W Hutchinson, MN 55350	Electronic Service	No	OFF_SL_20-8_PR-20-8

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David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_20-8_PR-20-8
Shane	Young	office@northern.tel	Northern Telephone Company	13448 County Road 25 Wawina, MN 55736	Electronic Service	No	OFF_SL_20-8_PR-20-8