

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Annual Certifications
Related to Eligible Telecommunications
Carriers' (ETC) Use of Federal Universal
Service Support

DOCKET NO. P-999/PR-20-8

**COMMENTS OF THE OFFICE
OF THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments providing recertification recommendations to the Minnesota Public Utilities Commission (“Commission”) for those Minnesota eligible telecommunications carriers (“ETCs”) that receive, have received, or will receive, federal Universal Service High Cost Program (“High Cost Program”) funding.¹ While the OAG has identified some follow-up items for certain of Minnesota’s High Cost Program ETCs, the OAG has found no violations of program rules that would warrant a denial of ETC status.² Accordingly, the OAG recommends recertification for all of Minnesota’s High Cost Program ETCs.

BACKGROUND

I. STATE ETC DESIGNATION, RECERTIFICATION, AND SCHEDULE

A. ETC DESIGNATION

Under the Federal Telecommunications Act of 1996, a telecommunications carrier must be designated as an ETC to be eligible to receive funding from the federal Universal Service Lifeline Program (“Lifeline Program”) and the High Cost Program.³ Currently, the services supported by the federal Universal Service programs are voice telephony services and broadband

¹ ETCs that receive only federal Universal Service Lifeline Program funding file truncated versions of the FCC Form 481 and do not require annual recertification by the state.

² Note that the OAG had fewer than sixty (60) days to analyze the 107 FCC Forms 481 filed by Minnesota High Cost Program ETCs. If the OAG’s follow-up reveals that a Minnesota High Cost Program ETC has violated program rules in a manner that warrants enhanced compliance obligations or a revocation of ETC status, the OAG will submit a filing in this, or another, Commission docket to provide recommendations about how to address the non-compliance.

³ 47 U.S.C. § 214(e)(1).

Internet access services (“BIAS”).⁴ With limited exceptions,⁵ state commissions are responsible for the designation of ETCs.⁶

B. ETC RECERTIFICATION

Each year, an ETC must file all information and certifications required by the federal Universal Service rules with the Universal Service Administrative Company (“USAC”).⁷ In furtherance of this requirement, the Federal Communications Commission (“FCC”) has created the Form 481, a detailed and comprehensive form that all ETCs must file by July 1.⁸ Although the FCC no longer requires ETCs to file copies of their FCC Forms 481 with the states,⁹ the Commission issued an order in 2019 mandating that Minnesota ETCs electronically file their FCC Forms 481 with the state.¹⁰

States play a critical role in ETC recertification. As recognized by the FCC, “[t]he billions of dollars that the Universal Service Fund disburses each year to support vital communications services comes from American consumers and businesses, and recipients must be held accountable for how they spend that money.”¹¹ Accordingly, a state may adopt those ETC regulations and requirements it sees fit to preserve and advance federal Universal Service so long as those regulations and requirements are not inconsistent with the FCC’s rules.¹² In fact, the FCC’s ETC reporting and certification requirements reflect a “floor rather than a ceiling” for states and “state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the [federal Universal Service] statute and [the] implementing regulations. . . .”¹³

⁴ 47 C.F.R. § 54.101(a).

⁵ See 47 U.S.C. § 214(e)(6) (discussing ETC designation for common carriers not subject to state commission jurisdiction).

⁶ 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(b). See also WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier, WC Docket Nos. 09-197, 10-90, Public Notice, DA 18-714, 1 n.4 (July 10, 2018) (“Carriers subject to state jurisdiction should follow state rules and requirements to apply for [ETC] designation.”).

⁷ *In the Matter of Connect America Fund ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Report and Order, FCC 17-87, ¶ 15 (July 7, 2017) (“*ETC Annual Reports and Certifications Order*”). USAC is the designated administrator of the federal Universal Service support mechanisms. See 47 C.F.R. § 54.701(a).

⁸ 47 C.F.R. § 54.313(j); see also Instructions to FCC Form 481 at 1, <https://www.usac.org/wp-content/uploads/high-cost/documents/Forms/FCC-Form-481-Instructions.pdf> (last visited Aug. 26, 2020).

⁹ *ETC Annual Reports and Certifications Order* at ¶ 15.

¹⁰ *In the Matter of Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of the Federal Universal Service Support Required Pursuant to C.F.R. 54.313*, Docket No. P-999/PR-19-8, Order Certifying Eligible Telecommunications Carriers’ Use of Federal High-Cost Subsidy at 3-4 (Oct. 17, 2019) (“*2019 ETC Order*”).

¹¹ *In the Matter of Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, ¶ 568 (Nov. 18, 2011) (“*2011 CAF Order*”).

¹² 47 U.S.C. § 254(f).

¹³ *2011 CAF Order* at ¶¶ 573-74 (discussing state ETC authority); see also *id.* at ¶ 611 (“[C]onsistent with the partnership between the Commission and the states to preserve and enhance universal service, and our recognition that states will continue to be the first place that consumers may contact regarding consumer protection issues, we encourage states to bring to our attention issues and concerns about all carriers operating within their boundaries. . . .”).

C. ETC RECERTIFICATION SCHEDULE

The Commission has established the following schedule for annual ETC recertification:

July 1	Deadline for ETCs to file petitions and supporting documentation, including the information required by the FCC Form 481.
September 1	Deadline for the OAG, the Department, and other interested persons to file comments.
September 8	Deadline for reply comments. ¹⁴

In order for Minnesota High Cost Program ETCs to be eligible for support, the Commission must file an annual certification with the FCC and USAC by October 1 of each year certifying that High Cost Program funds were used in the previous year, and will be used in the coming year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.¹⁵ If the Commission submits its certification after October 1 of the applicable calendar year, the Minnesota High Cost Program ETCs may incur funding reductions.¹⁶

A list of the ETCs requiring Commission certification by October 1, 2020 is provided in Attachment A.

II. HIGH COST PROGRAM RECERTIFICATION REQUIREMENTS AND ISSUES

A. HIGH COST PROGRAM FUNDING SUMMARY

In 2019, USAC disbursed \$250,157,654 to Minnesota-designated High Cost Program ETCs from ten (10) different High Cost Program funds.¹⁷ Table 1 below details the disbursements from the ten (10) funds.

Table 1

Fund Name	Fund Acronym	Funding Disbursed in MN - 2019
Alternative Connect America Model	ACAM	\$66,216,232
Alternative Connect America Model II	ACAM II	\$43,138,423
Connect America Cost Model	CACM	\$85,622,880
Connect America Fund Broadband Loop Support	BLS	\$22,063,339

¹⁴ *In the Matter of Annual Certifications Related to Eligible Telecommunications Carriers' Use of Federal Universal Service Support*, Docket No. P-999/PR-14-8 at 1 (Apr. 11, 2014).

¹⁵ 47 C.F.R. § 54.314(a).

¹⁶ 47 C.F.R. § 54.314(d).

¹⁷ This year, 107 FCC Forms 481 were filed by the companies, with each form reporting on a specific Study Area Code. Four of the FCC Forms 481 were filed by companies that have not previously filed an ETC recertification. Those companies are Broadband Corp., Jaguar Communications, LTD Broadband, Inc., and Roseau Electric Cooperative.

Connect America Fund Intercarrier Compensation	ICC	\$18,224,958
Connect America Fund Phase II Auction	CAF II Auc	\$ 1,955,255
Frozen High Cost Support	FHCS	\$ 1,371,760
High Cost Loop	HCL	\$11,902,332
Interstate Common Line Support	ICLS	\$ 892,975
Rural Broadband Experiment	RBE	\$ (1,230,500) ¹⁸

A brief description of each of these funds is included in Attachment B.

B. FEDERAL HIGH COST PROGRAM CERTIFICATION REQUIREMENTS.

Pursuant to the FCC's rules, each year High Cost Program ETCs must provide information and a certification demonstrating:

- They are able to function in emergency situations as delineated in the FCC's rules.
- Their voice services are no more than two standard deviations above the applicable national average urban rate for voice service.
- Their pricing of a service that meets the FCC's broadband public interest obligations is no more than the applicable benchmark, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states where the ETC receives support.
- Holding company, operating company, affiliate, and any doing-business-as or other branding designations, as well as the related Study Area Codes.
- If applicable, 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 services 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 FCC's Wireline Competition and Wireless Telecommunications Bureaus, and the Office of Engineering and Technology.¹⁹

¹⁸ There were two companies that received RBE funds in Minnesota in calendar year 2019 – Federated Telephone Cooperative and Paul Bunyan Rural. The negative dollar amount reflected above for RBE is predominantly the result of funding being returned by Lake County d/b/a Lake Connections after relinquishment of its ETC status.

¹⁹ 47 C.F.R. § 54.313(a)(1)-(6).

C. FEDERAL HIGH COST PROGRAM BUILD-OUT MILESTONES

High Cost Program ETCs that are subject to specific build-out milestones are required to notify the FCC, USAC, and their states within ten (10) business days if they fail to meet an applicable build-out milestone.²⁰ Failure to meet a build-out milestone may trigger additional reporting obligations, withholding of support, and/or a recovery action by USAC.²¹ “[I]f a state commission determines, after reviewing the annual section 54.313 report, that an ETC did not meet its speed or build-out requirements for the prior year, a state commission should refuse to certify that support is being used for the intended purposes.”²² Where a state has a concern regarding an ETC’s build-out performance, it is empowered to make a recommendation to the FCC regarding prospective High Cost Program support adjustments or whether to recover past support amounts.²³ Although a state may also elect to revoke a company’s ETC’s status, such a remedy should not be invoked except in the most egregious circumstances and state commissions should first explore other alternatives to remedy concerns about an ETC’s performance.²⁴

D. STATE HIGH COST PROGRAM CERTIFICATION REQUIREMENTS.

Each year, concurrent with its FCC Form 481 filing, a Minnesota High Cost Program ETC must file with the Commission an affidavit that includes:

- The position of the affiant;
- That the affiant understands and is familiar with the requirements of the FCC concerning federal Universal Service funding;
- That the funds are and will be used appropriately (i.e., for their intended purposes);
- That the company is compliant with applicable rules on service quality and consumer protection; and
- 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.²⁵

A Minnesota High Cost Program ETC that serves on Tribal lands is required to work with the Commission’s and the Department’s Tribal Liaisons.²⁶

²⁰ 47 C.F.R. § 54.320(d).

²¹ 47 C.F.R. § 54.315(c)(4); 54.320(d).

²² 2011 CAF Order at ¶ 612.

²³ *Id.*

²⁴ *Id.* at ¶ 618.

²⁵ *In the Matter of Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of the Federal Universal Service Support Required Pursuant to § C.F.R. 54.313*, Docket No. P-999/PR-18-8, Order Certifying Eligible Telecommunications Carriers’ Use of Federal High-Cost Subsidy and Requiring Comment Period at 3 (Oct. 24, 2018).

²⁶ 2019 ETC Order at 3. Note that the FCC has contemplated that ETCs that “fail[] to satisfy the Tribal government engagement obligation would be subject to financial consequences, including potential reduction in support should they fail to fulfill their engagement obligations.” 2011 CAF Order, ¶ 637.

E. HIGH COST PROGRAM ITEMS FOR DISCUSSION

ITEM NO. 1: Funding Certification - Whether the companies listed in Attachment A complied with the Commission's order and provided certification from a company officer that the company has used the High Cost Program support received only for the provision, maintenance, and upgrading of facilities and services for which the support was intended, and will appropriately use the support in the coming year.

CONCLUSION: All of the companies in Attachment A provided the required certification.

There is no Commission follow-up required for this item.

ITEM NO. 2: Commission Affidavit – Whether the companies listed in Attachment A filed the Commission-required affidavits (see section II.D above).

CONCLUSION: At least one company failed to file the Commission-required affidavit or certified only a subset of the required items. The OAG will reach out to the company/companies that did not comply with this requirement to remind them of their filing obligation. If a company fails to comply with this Commission-mandated affidavit requirement again next year, the OAG will provide a recommendation(s) to address the non-compliance.

Because this is a still a relatively new requirement, the Commission should remind companies of the obligation to file a copy of the affidavit with the Commission.

ITEM NO. 3: Form 481 Filing – Whether the Commission received the required FCC Form 481 filing.

CONCLUSION: Last year, the Commission issued an order requiring companies to file their FCC Forms 481 with the state. At least one company failed to file a copy of its FCC Form 481 with the state. The OAG will reach out to any company/companies that did not comply with this requirement to remind them of their filing obligation. If a company fails to comply with this Commission-mandated requirement again next year, the OAG will provide a recommendation(s) to address the non-compliance.

Because this is the first year the new requirement is in effect, the Commission should remind companies of their obligation to file a copy of their FCC Form 481 with the Commission.

ITEM NO. 4: Tribal Outreach – Whether there has been sufficient Tribal engagement.

CONCLUSION: Last year, the Commission directed companies serving Tribal lands to fully cooperate with the Department, the Tribes, and the Commission.

While the OAG has reviewed the submissions of those companies that serve Tribal lands and has formed some preliminary thoughts about Tribal engagement, it recognizes that the onset of the COVID-19 pandemic in March 2020 likely frustrated attempts at increased Tribal engagement. Accordingly, the OAG concludes that the Commission should delay strict adherence to its Tribal engagement requirement until the start of calendar year 2021.

There is no Commission follow-up required for this item.

ITEM NO. 5: Companies Serving Primarily in Another State – Whether it is necessary for the Commission to certify companies that primarily operate in other states.

The companies below serve primarily in the state indicated:

<u>Company Name</u>	<u>SAC</u>	<u>State</u>
CenturyTel Chester	351126	IA
CenturyTel NW WI	330950	WI
Hills Tel Co-SD	391405	SD
Polar Comm Mut Aid	381630	ND
Polar Telecomm.	381614	ND
SplitRock Telecom Cooperative Inc.	391657	SD

CONCLUSION: Last year, the Department of Commerce (“Department”) confirmed that the companies that serve primarily in other states were being certified by the public utility commissions in the states in which they serve. In addition, the Department reached out to USAC and was told that there is no need for this Commission to certify companies that operate primarily in other states. The OAG confirmed with the Department that the Department engaged in the same process for the current year. Accordingly, the OAG defers to the Department to make a recommendation for this item.

ITEM NO. 6: Results of Network Performance Testing – Whether the Commission has received sufficient information regarding the results of the companies’ network performance testing.

CONCLUSION: As of last year, the FCC Wireline Competition and Wireless Telecommunications Bureaus, and the Office of Engineering Technology had not yet released the format for network performance testing. Although the performance measures have now been released, the FCC established January 1, 2020 as earliest pre-testing start date and July 2020 as the earliest testing start date.²⁷ Accordingly, the OAG recommends postponing Commission review of this item until the calendar year 2021 ETC recertification process. The OAG will

²⁷ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, FCC 19-104, ¶ 81 (Oct. 31, 2019) (establishing pre-testing and testing start dates for each of the High Cost Program funds).

closely monitor network performance testing in calendar year 2021 and report its findings to the Commission as part of the next round of ETC recertifications.

There is no Commission follow-up required for this item.

ITEM NO. 7: Offering of Stand-Alone Voice Service – Whether companies that receive CAF and ACAM funding are offering the required stand-alone voice service.

CONCLUSION: Companies that receive CAF and ACAM funding are required to offer stand-alone voice service.²⁸ For at least one company, the OAG was unable to locate a stand-alone voice service offering on the company's web page. The OAG will reach out to any company/companies for which it was unable to locate a stand-alone voice service offering to ensure that such an offering exists. The OAG will also provide the Department with the identity of the company/companies so that the Department can work with them to ensure their websites offer clear information about stand-alone voice service. If the OAG determines that a company is not offering the required stand-alone voice service, it will submit a filing in this, or another, Commission docket to provide recommendations about how to address the non-compliance.

There is no Commission follow-up required for this item.

ITEM NO. 8: Build-Out Milestones – Whether companies subject to build-out milestones met those milestones.

CONCLUSION: Two companies filed letters in January 2020 notifying the Commission that they may not have met their 2019 deployment milestones in Minnesota.²⁹ While the OAG plans to reach out to both of these companies to confirm that they complied with their federal every-three-month reporting obligations, a review of the FCC's EDOCs and ECFS systems does not indicate any reporting non-compliance issues for either company.

There is no Commission follow-up required for this item.

²⁸ *In the Matter of Connect America Fund et al.*, WC Docket No. 10-90 et al., Order on Reconsideration, FCC 18-5, ¶ 20 (Jan. 31, 2018) (describing the genesis of, and reiterating, the stand-alone voice telephony requirement).

²⁹ See generally Letter from J. Chicoine, Senior Manager of Regulatory Affairs, Frontier Communication Corporation, to R. Barlow, Acting Executive Secretary, Minnesota Public Utilities Commission, Docket No. P-999/PR-20-8 (Jan. 16, 2020) (filed Jan. 23, 2020); Letter from A. Schriner, Director of Public Policy, CenturyLink, to R. Barlow, Acting Executive Secretary, Minnesota Public Utilities Commission, Docket No. P-999/PR-20-8 (Jan. 23, 2020) (enclosing an erratum filing notifying the FCC that the company did not meet its 2019 High Cost Program deployment milestone in Minnesota).

ITEM NO. 9: Frontier Communications Follow-Up – Whether the Commission should recertify Frontier Communications (“Frontier”) as an ETC for calendar year 2021.

In January 2020, the Commission issued a Request for Review and Comment Period concerning potential irregularities in the use of Frontier’s High Cost Program support.³⁰ The OAG and the Department filed comments, and Frontier filed reply comments in the docket.³¹ At an agenda meeting in June 2020, the Commission voted unanimously to take no official action at the time and instead directed the Executive Secretary to contact USAC. To date, the OAG has not heard anything from USAC regarding Frontier’s use of its 2019 High Cost Program funding.³²

CONCLUSION: Given the Commission’s recent inquiry to USAC regarding Frontier’s use of its 2019 High Cost Program funding and the short timeframe for ETC recertification, the OAG recommends ETC recertification for Frontier unless or until the Commission receives information to the contrary from USAC.

III. LIFELINE PROGRAM RECERTIFICATION REQUIREMENTS AND ISSUES

A. LIFELINE ANNUAL CERTIFICATION REQUIREMENTS FOR HIGH COST ETCs

All ETCs are required to offer Lifeline services to qualifying low income consumers throughout their designated service areas.³³ In addition, all ETCs must advertise the availability of Lifeline services in a manner reasonably designed to reach the eligible households within their designated service areas.³⁴ USAC provides guidance on materials and methods to reach eligible households that do not currently receive Lifeline services including, among other things:

- Posting notices at public transportation stops and agencies, shelters, and soup kitchens;
- Running public service announcements; and
- Providing information booths at central locations.³⁵

³⁰ See *In the Matter of the Annual Certification Related to ETC Use of Federal Universal Service Support*, Docket No. P-999/PR-20-8, Request for Review and Comment Period at 1 (Jan. 15, 2020) (“*Frontier ETC Review*”).

³¹ *Frontier ETC Review*, Docket No. P-999/PR-20-8, Comments of the OAG (Mar. 30, 2020), Comments of the Department (Mar. 30, 2020), and Reply Comments of Frontier Communications (Apr. 27, 2020).

³² This is not unusual as, even if it does decide to conduct an audit, USAC keeps the fact of any program audit and the results of that audit confidential until the FCC deems the audit final. See USAC Website, About-Appeals & Audits-Beneficiary and Contributor Audit Program (BCAP), <https://www.usac.org/about/appeals-audits/beneficiary-and-contributor-audit-program-bcap/> (last visited Aug. 30, 2020). The duration of an audit will vary based on the size and dollar amount of the support involved, with many audits taking more than a year to complete. *Id.*

³³ 47 C.F.R. § 54.405(a).

³⁴ 47 C.F.R. § 54.405(b).

³⁵ USAC Website, Lifeline–Additional Requirements–Advertise Lifeline, <https://www.usac.org/lifeline/additional-requirements/advertise-lifeline/> (last visited Aug. 25, 2020).

USAC also recommends developing Lifeline advertising that can be read by any sizeable non-English speaking populations and coordinating with governmental agencies that administer government assistance programs, such as social service agencies, tribal organizations, community centers, public schools, and nursing homes.³⁶

Under the FCC's rules, High Cost Program ETCs that receive Lifeline Program support must annually report:

- Holding company, operating company, affiliate, and any doing-business-as or other branding designations, as well as the applicable Study Area Codes; and
- Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan.³⁷

An ETC's annual FCC Form 481 will be considered non-compliant if: "The [provided Lifeline] website link is inactive or [the] page cannot be found, [t]he ETC's 'Home Page' is not specific to the Lifeline Program, [t]he web page does not provide information on minutes or usage parameters associated with Lifeline Program plans, [t]he web page discusses Lifeline Program eligibility and sign-up, but not terms and conditions or available Lifeline Program service plan price(s), or [d]oes not provide information on charges incurred for toll calls and additional services."³⁸

B. LIFELINE PROGRAM ITEMS FOR DISCUSSION

ITEM NO. 1: Whether companies advertised the availability of Lifeline services in a manner reasonably designed to reach eligible households within their service areas.

CONCLUSION: Unless voluntarily submitted as part of a company's annual FCC Form 481, the OAG has no insight into the type(s) of Lifeline advertising a company conducts each year and cannot determine whether such advertising is reasonably designed to reach the eligible households within an ETC's service area.

Accordingly, and on a triennial basis beginning with the calendar year 2021 FCC Form 481 filing, the OAG recommends that the Commission require the companies to submit sample Lifeline advertising materials.³⁹ Those companies

³⁶ *Id.*

³⁷ 47 C.F.R. § 54.422(a). To the extent an ETC offers a plan(s) to Lifeline subscribers that is generally available to the public, the ETC may provide summary information regarding such a plan(s), such as a link to a public website that outlines the terms and conditions of the plan(s). 47 C.F.R. § 54.422(a)(2).

³⁸ USAC Website, Lifeline—Additional Requirements—Annual Filings, <https://www.usac.org/lifeline/additional-requirements/report-data-annually-fcc-form-481/> (last visited Aug. 25, 2020).

³⁹ The submission of these materials should also include an explanation of where/how each advertising material was deployed to reasonably reach eligible households within a company's service area(s).

that already voluntarily provide this information as part of an applicable FCC Form 481 filing should be permitted to reference the filing to satisfy this requirement.

ITEM NO. 2: Whether the companies provided active Lifeline weblinks or websites that could be found.

CONCLUSION: The Lifeline weblinks provided in the FCC Forms 481 of some companies did not work and/or a working web page could not be found. Moreover, there seems to be at least one company that erroneously believes that it does not have to provide Lifeline service. The OAG will reach out to any company/companies for whom it was unable to locate a working main or Lifeline web page to notify them of this issue. The OAG will also reach out to any company who does not seem to understand its Lifeline service obligation to make sure that it understands that the offering of Lifeline service is an FCC-mandated requirement for the acceptance of High Cost Program funds. If a company fails to comply with this requirement again next year, the OAG will provide recommendations to address the non-compliance.

Given the critical importance of Lifeline service, the OAG recommends that the Commission require all of the companies to conduct periodic (e.g., monthly) checks of their Lifeline web pages to ensure they are functional.

ITEM NO. 3: Whether the companies provided Lifeline-specific home pages.

CONCLUSION: For those companies with functioning websites, the majority of the companies had Lifeline-specific home pages. The OAG will reach out to any company/companies that do not have Lifeline-specific home pages to make them aware of this requirement. The OAG will also provide the Department with the identity of the company/companies that do not have Lifeline-specific home pages so that the Department can work with them to ensure their websites offer clear information about Lifeline service offerings.

There is no Commission follow-up required for this item.

ITEM NO. 4: Whether companies' web pages provided Lifeline plan information regarding minutes and usage parameters, eligibility and sign-up, terms and conditions, and toll call and additional service charges.

CONCLUSION: While the majority of the companies provided eligibility and sign-up information on their web pages, many of them did not include minutes and usage, terms and conditions, and/or toll and additional service charge information. The OAG will reach out to any company/companies for which it was unable to find this information to determine if/where such information exists. The OAG will also provide the Department with the identity of the company/companies that

did not include this information so that the Department can work with them to ensure their websites offer clear information about Lifeline service.

There is no Commission follow-up required for this item.

ITEM NO. 5: Whether companies made Tribal governments aware of enhanced Lifeline benefits for Tribal lands.

CONCLUSION: The Lifeline Program provides enhanced benefits for qualifying Tribal lands.⁴⁰ Because it was only last year that the Commission directed companies serving Tribal lands to fully cooperate with the Commission's and the Department's Tribal liaisons, the OAG recommends delaying review of this item until the calendar year 2021 ETC recertification process.

There is no Commission follow-up required for this item.

IV. SUMMARY OF RECOMMENDATIONS

As a result of its ETC recertification review, the OAG recommends that the Commission take the following specific actions with respect to Minnesota's High Cost Program ETCs:

- Remind companies of their obligation to file the Commission-mandated affidavit;
- Remind companies of their obligation to file a copy of the FCC Form 481 with the Commission;
- Beginning with the calendar year 2021 ETC recertification process, and on a triennial basis, require companies to submit sample Lifeline advertising materials, including an explanation of where/how each advertising material was deployed to reasonably reach eligible households within a company's service area(s); and
- Require all companies to conduct periodic (e.g., monthly) checks of their Lifeline web pages to ensure functionality.

CONCLUSION

The OAG recommends that the Commission recertify all of the Minnesota High Cost Program ETCs listed in Attachment A. Although the OAG has identified areas of follow-up for certain Minnesota High Cost Program ETCs, the OAG did not identify any program rule violations that it felt were sufficient to warrant a denial of ETC status at this time. If the OAG detects a violation of the federal Universal Service rules during its follow-up that requires the

⁴⁰ 47 C.F.R. § 54.403(a)(3) (Lifeline support); 54.413 (Tribal Link Up).

Commission's attention, it will submit a filing in this or another Commission docket to provide recommendations to address the non-compliance.

Dated: September 1, 2020

Respectfully submitted,

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OAG Attachment A

Study Area Codes (SACs) for Minnesota Public Utilities Commission Certification for Calendar Year 2020

No.	SAC	Carrier Name	State	Carrier Type	2019 Certification (Y/N)
1	361346	ACE TEL ASSN-MN	MN	ILEC	Y
2	361347	ALBANY MUTUAL ASSN	MN	ILEC	Y
3	361374	ARROWHEAD COM CORP	MN	ILEC	Y
4	361350	ARVIG TEL CO	MN	ILEC	Y
5	361356	BENTON COOP TEL CO	MN	ILEC	Y
6	361358	BLUE EARTH VALLEY	MN	ILEC	Y
7	361362	BRIDGEWATER TEL CO	MN	ILEC	Y
8	369043	Broadband Corp	MN	CETC	N
9	361365	CALLAWAY TEL CO	MN	ILEC	Y
10	361440	CANNON VLY TELECOM	MN	ILEC	Y
11	351126	CENTURYTEL-CHESTER	IA	ILEC	Y
12	361445	CENTURYTEL-MINNESOTA	MN	ILEC	Y
13	330950	CENTURYTEL-NW WI	WI	ILEC	Y
14	361425	CHRISTENSEN COMM CO	MN	ILEC	Y
15	361123	CITIZENS-FRONTIER-MN	MN	ILEC	Y
16	367123	CITIZENS-FRONTIER-MN	MN	ILEC	Y
17	361353	CITY OF BARNESVILLE	MN	ILEC	Y
18	361370	CLARA CITY TEL EXCH	MN	ILEC	Y
19	361372	CLEMENTS TEL CO	MN	ILEC	Y
20	361373	CONSOLIDATED TEL CO	MN	ILEC	Y
21	369044	Consolidated Telephone Company	MN	CETC	Y
22	361499	CROSSLAKE TEL CO	MN	ILEC	Y
23	361381	DUNNELL TEL CO	MN	ILEC	Y
24	361383	EAGLE VALLEY TEL CO	MN	ILEC	Y
25	361385	EAST OTTER TAIL TEL	MN	ILEC	Y
26	361384	EASTON TEL CO	MN	ILEC	Y
27	361386	ECKLES TEL CO	MN	ILEC	Y
28	361456	EMBARQ MINNESOTA	MN	ILEC	Y
29	361387	EMILY COOP TEL CO	MN	ILEC	Y
30	361389	FARMERS MUTUAL TEL	MN	ILEC	Y
31	361390	FEDERATED TEL COOP	MN	ILEC	Y
32	366130	Federated Telephone Cooperative	MN	CETC	Y
33	361403	FEDERATED UTILITIES	MN	ILEC	Y
34	361391	FELTON TEL CO. INC.	MN	ILEC	Y
35	361367	FRONTIER-MINNESOTA	MN	ILEC	Y
36	361395	GARDEN VALLEY TEL CO	MN	ILEC	Y
37	369039	Garden Valley Telephone Company	MN	CETC	Y
38	361396	GARDONVILLE COOP TEL	MN	ILEC	Y
39	361399	GRANADA TEL CO	MN	ILEC	Y
40	361401	HALSTAD TEL CO	MN	ILEC	Y

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Study Area Codes (SACs) for Minnesota Public Utilities Commission Certification for Calendar Year 2020

No.	SAC	Carrier Name	State	Carrier Type	2019 Certification (Y/N)
41	369040	Halstad Telephone Company	MN	CETC	Y
42	361404	HARMONY TEL. CO.	MN	ILEC	Y
43	361405	HILLS TEL CO, INC	MN	ILEC	Y
44	391405	HILLS TEL CO-SD	SD	ILEC	Y
45	361408	HOME TEL CO – MN	MN	ILEC	Y
46	361409	HUTCHINSON TEL CO	MN	ILEC	Y
47	361654	INTERSTATE TELECOMM.	MN	ILEC	Y
48	369041	Interstate Telecommunications Cooperative, Inc.	MN	CETC	N
49	369038	Jaguar Communication, Inc	MN	CETC	N
50	361410	JOHNSON TEL CO	MN	ILEC	Y
51	361412	KASSON & MANTORVILLE	MN	ILEC	Y
52	366110	Lake County d/b/a Lake Connections ¹	MN	CETC	Y
53	361419	LISMORE COOP TEL CO	MN	ILEC	Y
54	361422	LONSDALE TEL CO	MN	ILEC	Y
55	361443	LORETEL SYSTEMS, INC	MN	ILEC	Y
56	369047	LTD Broadband LLC	MN	CETC	N
57	361424	MABEL COOP TEL - MN	MN	ILEC	Y
58	361426	MANCHESTER-HARTLAND	MN	ILEC	Y
59	361427	MANKATO-HICKORYTECH	MN	ILEC	Y
60	361430	MELROSE TEL CO	MN	ILEC	Y
61	361375	MID-COMM-HICKORYTECH	MN	ILEC	Y
62	369015	Midcontinent Communications	MN	CETC	Y
63	361413	MID STATE DBA KMP	MN	ILEC	Y
64	361433	MID STATE TEL CO	MN	ILEC	Y
65	361431	MIDWEST TEL CO	MN	ILEC	Y
66	361439	MINNESOTA VALLEY TEL	MN	ILEC	Y
67	361442	NEW ULM TELECOM, INC	MN	ILEC	Y
68	361500	NORTHERN TEL CO – MN	MN	ILEC	Y
69	361448	OSAKIS TEL CO	MN	ILEC	Y
70	361450	PARK REGION MUTUAL	MN	ILEC	Y
71	361451	PAUL BUNYAN RURAL	MN	ILEC	Y
72	366132	Paul Bunyan Rural Telephone Cooperative	MN	CETC	Y

¹ The Minnesota Public Utilities Commission granted Lake County’s petition to relinquish its eligible telecommunications carrier (“ETC”) status effective June 3, 2019. *See In the Matter of the Petition of Lake County for Relinquishment of ETC Designation*, Docket No. P-6944/RL-19-195, Order at 1 (July 21, 2020). However, because the company received federal Universal Service High Cost Program funding for part of calendar year 2019 it shows up on USAC’s ETC recertification list.

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Study Area Codes (SACs) for Minnesota Public Utilities Commission Certification for Calendar Year 2020

No.	SAC	Carrier Name	State	Carrier Type	2019 Certification (Y/N)
73	366133	Paul Bunyan Rural Telephone Cooperative	MN	CETC	Y
74	361453	PEOPLES TEL CO – MN	MN	ILEC	Y
75	361454	PINE ISLAND TEL CO	MN	ILEC	Y
76	381630	POLAR COMM MUT AID	ND	ILEC	Y
77	381614	POLAR TELECOMM.	ND	ILEC	Y
78	365142	QWEST CORP-MN	MN	ILEC	Y
79	361472	REDWOOD COUNTY TEL	MN	ILEC	Y
80	369045	Roseau Electric Cooperative, Inc.	MN	CETC	N
81	361474	ROTHSAY TEL CO, INC	MN	ILEC	Y
82	361475	RUNESTONE TEL ASSN	MN	ILEC	Y
83	361423	Runestone Telephone Association	MN	ILEC	Y
84	361476	SACRED HEART TEL CO	MN	ILEC	Y
85	361479	SCOTT RICE – INTEGRA	MN	ILEC	Y
86	361483	SLEEPY EYE TEL CO	MN	ILEC	Y
87	391657	SPLITROCK TELECOM COOPERATIVE INC.	SD	ILEC	Y
88	361485	SPRING GROVE COOP	MN	ILEC	Y
89	361487	STARBUCK TEL CO	MN	ILEC	Y
90	369014	T-Mobile Central LLC	MN	CETC	Y
91	361491	TWIN VALLEY-ULEN TEL	MN	ILEC	Y
92	361494	UPSALA COOP TEL ASSN	MN	ILEC	Y
93	361495	VALLEY TEL CO – MN	MN	ILEC	Y
94	361501	WEST CENTRAL TEL	MN	ILEC	Y
95	369042	West Central Telephone Association	MN	CETC	Y
96	361502	WESTERN TEL CO	MN	ILEC	Y
97	361505	WIKSTROM TEL CO, INC	MN	ILEC	Y
98	369046	Wikstrom Telephone Company	MN	CETC	N
99	361348	WILDERNESS VALLEY	MN	ILEC	Y
100	361414	Windstream Communications, Inc.	MN	ILEC	Y
101	361482	Windstream Communications, Inc.	MN	ILEC	Y
102	361337	WINNEBAGO COOP ASSN	MN	ILEC	Y
103	361507	WINSTED TEL CO	MN	ILEC	Y
104	361508	WINTHROP TEL CO	MN	ILEC	Y
105	361512	WOLVERTON TEL CO	MN	ILEC	Y
106	361510	WOODSTOCK TEL CO	MN	ILEC	Y
107	361515	ZUMBROTA TEL CO	MN	ILEC	Y

OAG Attachment B

Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2019

Alternative Connect America Model (ACAM)¹ – The Alternative Connect America Cost Model (ACAM) 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. ACAM models the forward-looking economic costs of deploying a high-speed network and delivering broadband service. Carriers that elected this option receive predictable monthly payments to provide voice and broadband service to all funded locations over the program’s 10-year support term (2017-2026).

Deployment Requirements

Carriers must offer at least one commercial voice and one commercial broadband service that meet the relevant service requirements, and must meet the following broadband deployment milestones:

- 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

Alternative Connect America Cost Model II (ACAM II)² - 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 Cost Model (CACM)³ – The Connect America Cost Model, commonly called “CAF Phase II,” provides support to price- cap carriers based on a forward-looking model of the cost of constructing modern networks for deploying voice and broadband services in states with unserved areas. This is a six-year fund that began in 2015 when the FCC awarded 10 telecommunications carriers over \$1.5 billion in annual support to build voice- and broadband-capable infrastructure in their areas.

¹ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/acam/> (last visited Aug. 27, 2020).

² All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/acam-ii/> (last visited Aug. 27, 2020).

³ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-phase-ii/> (last visited Aug. 27, 2020).

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Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2019

Deployment Requirements

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
- 60 % of deployments by the end of year 4
- 80 % of deployments by the end of year 5
- 100 % of deployments by the end of year 6

Connect America Fund Phase II Auction (CAF II Auction)⁴ - Connect America Fund (CAF) Phase II Auction, commonly called “CAF II Auction,” provides support to carriers to deliver service in areas where the incumbent price cap carrier did not 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.

Deployment Requirements

In order to receive CAF II Auction funding, carriers must offer at least one stand-alone voice service plan and one plan that provides broadband service commercially. These services must meet the relevant service requirements to the requisite number of locations.

Carriers must complete:

- 40 % of deployments by the end of year 3
- 60 % of deployments by the end of year 4
- 80 % of deployments by the end of year 5
- 100 % of deployments by the end of year 6

Connect America Fund Broadband Loop Support (BLS)⁵ – Connect America Fund Broadband Loop Support (CAF-BLS) provides support for voice and broadband service, including stand-alone broadband. The fund, a reform of Interstate Common Line Support (ICLS), helps carriers recover the difference between loop costs associated with providing voice and/or broadband service and consumer loop revenues. In 2018, the FCC set a budget of \$1.42 billion for CAF-BLS, which will rise annually with inflation, and reduced the monthly per-line limit on support from \$250 to \$225 as of July 2019 and \$200 as of July 2021. The 2018 order

⁴ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-phase-ii-auction/> (last visited Aug. 27, 2020).

⁵ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-broadband-loop-support/> (last visited Aug. 27, 2020).

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Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2019

also establishes new deployment obligations for carriers remaining on CAF-BLS support, requiring them to expand deployment of broadband at speeds of 25/3 Mbps by 2024.

Connect America Fund Intercarrier Compensation (ICC)⁶ - The Inter-carrier Compensation (ICC) Recovery is the component of the Connect America Fund that introduces reforms to the inter-carrier 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.

Frozen High Cost Support (FHCS)⁷ - 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. Price cap carriers and their rate-of-return affiliates, CETCs, and rate-of-return carriers are eligible for frozen support if they were receiving High Cost Program support as of December 2011.

High Cost Loop Support (HCL)⁸ - 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 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.

Interstate Common Line Support (ICLS)⁹ - Interstate Common Line Support (ICLS) is available only to rate-of-return incumbent carriers (mostly rural and some non-rural carriers) and competitive carriers providing service in the areas of these companies, which must be designated as ETCs. ICLS helps to offset interstate access charges and is designed to permit each rate-of-return carrier to recover its common line revenue requirement, while ensuring that its subscriber line charges (SLCs) remain affordable to its customers. ICLS is based on annual projected data submitted by incumbent carriers each March 31 and is subject to an annual true-up process based on actual data submitted by incumbent carriers each December 31 for the previous calendar year. Because competitive carriers receive ICLS based on the incumbent carriers' data filings, which

⁶ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/icc-recovery/> (last visited Aug. 27, 2020).

⁷ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/frozen-high-cost-support/> (last visited Aug. 27, 2020).

⁸ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/high-cost-loop/> (last visited Aug. 27, 2020).

⁹ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/interstate-common-line-support/> (last visited Aug. 27, 2020).

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Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2019

are used to calculate per-line rates, competitive carriers do not need to file projected or true-up data for ICLS.

Rural Broadband Experiment (RBE)¹⁰ - 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.

¹⁰ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/rural-broadband-experiments/> (last visited Aug. 27, 2020).



The Office of
Minnesota Attorney General Keith Ellison
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September 1, 2020

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

Re: *In the Matter of the Annual Certifications Related to Eligible Telecommunications Carriers' (ETC) Use of Federal Universal Service Support*
Docket No. P-999/PR-20-8

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

/s/ **Kristin Berkland**

KRISTIN BERKLAND

Assistant Attorney General

(651) 757-1236 (Voice)

(651) 296-9663 (Fax)

kristin.berkland@ag.state.mn.us

Enclosure

CERTIFICATE OF SERVICE

Re: *In the Matter of the Annual Certifications Related to Eligible Telecommunications Carriers' (ETC) Use of Federal Universal Service Support*
Docket No. P-999/PR-20-8

I, JUDY SIGAL, hereby certify that on the 1st day of September, 2020, I e-filed with eDockets *Comments of the Minnesota Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	OFF_SL_20-8_PR-20-8
Issa	Asad	reg@qlinkwireless.com	Q Link Wireless LLC	499 E Sheridan St Ste 400 Dania Beach, FL 33004	Electronic Service	No	OFF_SL_20-8_PR-20-8
Sam	Bailey	Sam.Bailey@wirelesshome.com	i-Wireless	1 Levee Way Ste 3116 Newport, KY 41071	Electronic Service	No	OFF_SL_20-8_PR-20-8
Tracy	Bandemer	Tracy.Bandemer@itccoop.com	Interstate Telecommunications Cooperative, Inc..	312 4 h St W PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_20-8_PR-20-8
Dianne	Barthel	Dianne.barthel@centurylink.com	Centurylink Communications, LLC	200 South Fifth Street Room 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-8_PR-20-8
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_20-8_PR-20-8
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Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56221	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	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
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 Sebek, MN 56477	Electronic Service	No	OFF_SL_20-8_PR-20-8
Thomas	Burns	tgburns@otcpas.com	OLSEN THIELEN & CO. LTD	2875 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	tcrows@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
Angle	Dickison	angle.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	karl@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 Sebek, MN 56477	Electronic Service	No	OFF_SL_20-8_PR-20-8
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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 Sebek, 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 Ave PO 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@mv.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
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
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1586 1831 Anne Street NW Bemidji, MN 56601	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
Conrad	Johnson	jtcconrad@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
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
Steve	Kalka	skatk@albanytel.com	Albany Mutual Telephone Association	131 6 h 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 Aetha St Ruthron, 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@mabelltel.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	kathy.lund@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@rvr.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

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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 Sebek, MN 56477	Electronic Service	No	OFF_SL_20-8_PR-20-8
Paul	Paco Erickson	paco_erickson@mml.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	krisr@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

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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@tctel.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	1217 h Pl 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	tsoll@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@sylekcom.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 4 h 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	Weitla	kathy.weitla@itctel.com	Interstate Telecommunications Cooperative, Inc..	312 4 h 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 551012198	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kristi	Westbrook	Kris i@gocic.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 Sou h Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_20-8_PR-20-8
Mike	Wilker	Mwilker@jagcom.net	Jaguar Communications, 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