



Moss & Barnett

September 8, 2020

Via E-Filing

Mr. Will Seuffert
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
Saint Paul, MN 55101-2147

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 via e-Filing, on behalf of Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC, please find Reply Comments in the above-entitled docket.

The filing contains protected data, as defined in Minn. R. 7829.0100, subp. 19a. This information is subject to protection under 47 U.S.C. § 222, 47 C.F.R. § 64.2001, and Minn. Stat. § 13.679. Other information marked as protected data is being supplied to the Commission by Frontier, is subject of efforts by Frontier that are reasonable under the circumstances to maintain its secrecy, and derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. Accordingly, the information marked as protected data is private data on individuals under Minn. Stat. § 13.02, subd. 12 or trade secret information under Minn. Stat. § 13.37(1)(b). Frontier requests that this data be treated as nonpublic and private or confidential data under the Minnesota Government Data Practices Act, Minn. Stat. Ch. 13, and as protected data under the Commission's rules.

Sincerely,

Richard J. Johnson
Attorney at Law
P: (612) 877-5275
Rick.Johnson@lawmoss.com

RJJ/keb
Attachments
cc: Parties of Record

NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE

**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 Reply Comments of Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC
---	---

These Reply Comments are filed on behalf of Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC (collectively “Frontier”): (1) to respond to the August 31, 2020 Comments of the Department of Commerce (“Department Comments”) and September 1, 2020 Comments of the Office of Attorney General (“OAG Comments”); and (2) to provide supplemental information as previously indicated by Frontier.

Response to OAG Comments

Frontier agrees with the OAG who “recommends ETC recertification for Frontier” in the absence of any information to the contrary from USAC concerning use of CAF II funding.¹ Frontier has not received any communication from USAC in relation to any possible review or audit following the Commission’s July 15, 2020 letter to USAC.

Frontier also agrees with the OAG Comments that no follow-up is needed with respect to Frontier’s 2019 deployment milestone for Minnesota.²

The OAG Comments raise no other issues with respect to Frontier.

Response to Department Comments.

Frontier agrees with the Department recommendation that the Commission recertify Frontier as an ETC (along with other listed Minnesota ETCs).³

Frontier disagrees with the Department recommendation that the Commission order Frontier to correct addresses in the High Cost Universal Broadband (“HUBB”) data base.⁴

¹ OAG Comment p 9.

² OAG Comments p. 8.

³ Department Comments, p 15.

⁴ Department Comments, p. 10, 14, 15.

NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE

The Department Comments do not raise an issue with respect to Frontier's use of CAF II funding or other issues.

Supplemental Information

Frontier's July 1, 2020 Request for Eligible Telecommunication Carrier ("ETC") Certification indicated Frontier's intent to provide further information (in addition to the information contained in Attachment E to Frontier's Request).⁵

Questions were raised relating to the accuracy of location information and addresses provided by Frontier to the Universal Service Administrative Company ("USAC") HUBB Portal for Minnesota. Frontier explained its positions in regard to HUBB addresses in its Reply Comments, and the Commission did not accept a Department recommendation to require correction of addresses at its meeting on June 11, 2020. The Commission was correct in making this decision.

The Department Comments recognize that Commission decision⁶ but continue that recommendation. The Commission should not accept that recommendation for the reasons that led the Commission's June 11, 2020 decision, which are confirmed by the following supplemental information.

Since the June 11, 2020 meeting, Frontier has continued its efforts to increase the accuracy of address information, as discussed in Frontier's April 27, 2020 Reply Comments.⁷ Specifically, Frontier determined that it would be useful to conduct a review of the information available regarding the location information and addresses provided by Frontier to the HUBB Portal in order to be in a position to implement a solution as soon as it became available to the industry. To accomplish this objective, in July, 2020, Frontier retained Pitney Bowes Software Inc (PBSI), dba Precisely ("Precisely"). Precisely provides accuracy and consistency in data for 12,000 customers in more than 100 countries, including 90 percent of the Fortune 100, and these and other businesses rely on Precisely's data integration, data quality, location intelligence, and data enrichment products.

[NOT PUBLIC DATA BEGINS Frontier retained Precisely to review location information and addresses provided by Frontier to the HUBB Portal and to assist Frontier in making improvements in its CAF II address database. In addition, Frontier directed Precisely to begin its Frontier-wide efforts with location information and addresses provided by Frontier to the HUBB Portal for Minnesota.

The review and services to be provided by Precisely that pertain to Minnesota have not been completed, and the conclusions are thus necessarily not final. Nonetheless, the review and services have progressed to the point that substantial certainty is available and useful information can be

⁵ Frontier Request for ETC Certification, Attachment E, p. 4-5 ("Frontier anticipates making a supplemental filing to provide further information addressing these questions [raised in the Commission's June 11, 2020 meeting.]

⁶ Department Comments, p. 10

⁷ Frontier April 27 Reply Comments, p. 13-15 and Attachment E to Frontier Request for ETC certification, p 6-7.

NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE

provided to the Commission, subject to the possibility of correction based on completion of Precisely's review.

Frontier provided Precisely: (1) a list of the locations it has reported in USAC HUBB Portal for Minnesota; (2) a list of eligible census blocks in Minnesota associated with the CAF II program; and (3) the polygons (i.e., geometric shapes around Frontier equipment) reflecting where Frontier could provide 10/1 Mbps service. The list of 37,921 CAF II reported locations Frontier has reported to HUBB for Minnesota included 37,434 individual latitude/longitude locations.⁸

Minnesota Latitude and Longitude Locations Reported to the HUBB.

Precisely reviewed Frontier's CAF II reported locations to determine that the locations are within Frontier's 10/1 Mbps polygons and within a CAF II census block. Frontier has reported 37,921 latitude/longitudes in Minnesota to the HUBB. Precisely has street address data based on property records tax ("Precisely parcels") associated with 52,407 parcels of real estate located within Frontier's 10/1 Mbps polygons and a CAF II census block – i.e., the CAF II eligible areas where Frontier can provide 10/1 Mbps internet – 14,486 more than Frontier reported to the HUBB. While it is unlikely that all these additional 14,486 parcels would qualify as CAF locations, these additional parcels support the conclusion Frontier has reported a conservative number of CAF locations in Minnesota.

Addresses for Locations

Precisely also confirmed what Frontier had explained in its Reply Comments – that not even the Post Office has complete data for all CAF II locations in very rural areas. However, Precisely reviewed and confirmed that, of the 37,921 CAF II locations Frontier reported in Minnesota as of June 30, 2020, at least 95% of them were associated with a Precisely parcel. Precisely conducted this review by comparing Frontier's latitude/longitudes to Precisely's parcel data, which incorporates Minnesota property records. Frontier continues to review and refine these initial findings and will continue to update its location data, including any needed updates to the USAC HUBB, accordingly.

Precisely also compared the street addresses that Frontier provided for the 37,921 CAF II reported locations to Precisely's addresses for parcels. For 25,151 (66%) of these 37,921 CAF II reported locations, Frontier's street address was an exact match to the Precisely's street address for the parcel. For 8,108 (21%) of these 37,921 CAF II reported locations, the latitude/longitude fell within the Precisely parcel, but the street address was not an exact match. This data does not account for addresses that were different by only a few numbers or a different spelling of a street. Frontier continues to analyze addresses to determine which of these street addresses it will update, and Frontier will provide the best street address.

⁸ As used herein, a "CAF II reported location" is a living unit or small business that Frontier reported for the CAF II program. An individual "latitude/longitude location" is the single latitude/longitude point related to the CAF II reported locations. Thus, Multi-Dwelling Units ("MDUs") would represent a single latitude/longitude location but multiple CAF II reported locations.

NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE

For an additional 1,435 (4%) of these 37,921 CAF II reported locations, there was a Precisely parcel, but there was no street address associated with the Precisely parcel. In Frontier's review of a sample of these locations so far, it has found that Frontier latitude/longitude may have been assigned ("pinned") next to the parcel boundary, such as on the street or the edge of the property. Frontier continues to review these locations. **NOT PUBLIC DATA ENDS]**

While Frontier continues to object to the Department recommendation that the Commission issue an order pertaining to HUBB data, Frontier intends to continue its review and refinement of data, and to update its location data, including, if needed, updates to the USAC HUBB, as the engagement with Precisely continues.

Dated: September 8, 2020

Respectfully submitted,

_____/s/
Kevin Saville
Senior Vice President and General Counsel
Frontier Communications
401 Merritt 7
Norwalk, CT 06851
203-614-5030
KS9458@ftr.com

_____/s/
Richard J. Johnson
Patrick T. Zomer
Moss & Barnett, P.A.
150 South Fifth Street
Suite 1200
Minneapolis, MN 55402
612-877-5275
Rick.Johnson@lawmoss.com
Pat.Zomer@lawmoss.com

CERTIFICATE OF SERVICE

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

MPUC Docket No.: P-999/PR-20-8

Karen E. Berg certifies that on the 8th day of September, 2020, she filed a true and correct copy of the **Reply Comments of Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC**, by positing it on www.edockets.state.mn.us. Said document was also served via U.S. Mail and e-mail as designated on the Official Service List on file with the Minnesota Public Utilities Commission and attached hereto.

/s/ Karen E. Berg

Karen E. Berg

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Bickett	dave.bickett@parkregion.com	Otter Tail Telcom	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	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212	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

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@interstatetel.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
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 1596 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	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
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
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
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	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

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 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

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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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 551012198	Electronic Service	No	OFF_SL_20-8_PR-20-8
Kristi	Westbrock	Kristi@gocctc.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

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