

March 26, 2021

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

RE: Comments of the Minnesota Department of Commerce on the petitions filed by Rural Digital Opportunity Fund Grant Winners, Docket No: P999/CI-21-86

Dear Mr. Seuffert:

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

In the Matter of a Notice of Filing Requirements and Comment Deadlines Rural Digital Opportunity Fund (RDOF) Grant Winners

The attached are comments relate to issues common to all petitioners, for the Commission to consider under Docket No. P999/CI-21-86, as well as the specific petitions filed by Rural Digital Opportunity Fund (RDOF) grant winners in the following dockets:

<u>Petitioning Company</u>	<u>Docket No.</u>
Arrowhead Electric Cooperative	P6888/M-21-52
Cable One VoIP	P7055/M-21-161
CenturyLink, Inc.	P5096/M-21-158
Consolidated Telephone Co dba CTC	P406/AM-21-62
Farmers Mutual Telephone Company	P522/AM-21-77
Federated Telephone Cooperative	P523/AM-21-81
Garden Valley Telephone Coop	P409/AM-21-84
Gardonville Cooperative Telephone Assn	P527/M-21-73
Halstad Telephone Company	P530/M-21-83
Interstate Telecommunications	P515/AM-21-180
LTD Broadband LLC	P6995/M-21-133
Midcontinent Communications	P6186/SA-21-124
Next Link Internet	P7049/M-21-31
Paul Bunyan Rural Telephone Coop	P423/AM-21-56
Red River Rural Telephone Assn dba Red River Comm	P558/M-21-132
Roseau Electric Cooperative, Inc.	P6996/M-21-67
Savage Communications	P7051/M-21-53
Starlink Services, LLC	P7047/M-21-26
Wikstrom Telephone Company	P432/M-21-57
Winnebago Cooperative Telecom	P571/AM-21-92

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Docket No. P999/CI-21-86

Analysts assigned: Joy Gullikson, Diane Dietz

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The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ JOY GULLIKSON
Rate Analyst

/s/ DIANE DIETZ
Rate Analyst

JG/DD/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. P999/CI-21-86

I. PROCEDURAL BACKGROUND

A. RDOF AWARDS, GENERALLY

In the years since the Federal Communications Commission (FCC) established the Universal Service Fund, pursuant to Congress's directive, ". . . broadband has gone from being a luxury to a necessity integrated into nearly every facet of our economy and society."¹ To that end, the FCC established the Rural Digital Opportunity Fund (RDOF) to bring high-speed service to areas previously unserved with 25/3 Mbps service, where no similar federal or state broadband subsidy programs exist to provide 25/3 Mbps or better service.² RDOF was given a budget of \$20.4 billion to be made available over 10 years, over two phases. Phase I had a budget of \$16 billion and Phase II, \$4.4 billion.³

The FCC determined that the funds from Phase I were to be awarded through a multi-round, reverse, descending clock auction that favors faster services with lower latency and encourages intermodal competition in order to ensure that the greatest possible number of Americans will be connected to the best possible networks, all at a competitive cost,⁴ similar to the recent Connect American Fund (CAF) II grants.⁵ Winning bidders were announced December 7, 2020, with federal ten-year support of \$9.23 billion.⁶ The winning bidders are required to submit a post-auction application for support no later than January 29, 2021.⁷

In Minnesota, 24 companies, either singly, or in consortium with other providers, were winning bidders of \$408,150,745.60, to be distributed over ten years.⁸ These funds are in support of 142,852 locations that were previously unserved at 25/3 Mbps or greater. Most of the winning bidders committed to providing one gigabit per second of service.

By June 7, 2021, each winning bidder must demonstrate that it has high-cost eligible telecommunications carrier (ETC) status in all areas where the winning bidder will receive support.⁹

¹ *In the Matter of Rural Digital Opportunity Fund Connect America Fund*. WC Docket No. 10-126 and 10-90, Report and Order FCC 20-5 (2020) (*RDOF Order*), para. 3.

² *Id.*, para. 13.

³ *Ibid.*

⁴ *Id.*, para. 5.

⁵ *Ibid.*

⁶ *FCC Public Notice* DA 20-1422, (December 7, 2020), p.1.

⁷ *Ibid.*

⁸ *Id.* Attachment A "Winning Bidders Summary" and Attachment B "State Results Summary"

⁹ *FCC Public Notice*, p.7

As of March 19, 2021, of the 24 companies receiving notification of winning bids, one company, Aspire Networks, withdrew its petition for ETC status.¹⁰ One company, Windstream, has not filed a petition as of the creation of these comments.¹¹ Consolidated Communications, Inc. has not filed a petition for ETC status with the Commission because all its winning bids are in its existing ETC locations. Fond du Lac, listed by the FCC as a Minnesota winning bidder, also has not filed an application for ETC status with this Commission as it is a Tribal provider, and may apply directly to the FCC for its ETC status.

The Department notes that these comments pertain to those areas the Commission should address at this stage of the proceedings. As many of the companies have not begun offering service, or even begun their build outs, there is much that remains unknown. As companies that receive ETC status begin filing their recertifications, areas not addressed here will be examined at that time.

B. WINNING BIDDERS:

Except as noted, the following companies are winning bidders and have filed ETC applications with the Minnesota Commission:

¹⁰ Docket 21-32. The Commission approved the withdrawal on March 17, 2021.

¹¹ The Department reached out to Windstream, and received a reply email on March 16, 2021, stating that counsel for Windstream was in the process of drafting the applications.

Applicant	Docket No.	Support over 10 years	Census blocks	Locations
Arrowhead Electric Cooperative	21-52	\$18,462,273.10	440	4,879
Aspire Networks-2*	21-32	6,709,428.00	155	1,150
Cable One VoIP	21-161	1,671.00	2	19
CenturyLink, Inc.	21-158	15,646,093.10	516	3,265
Consolidated Communications, Inc.	**	11,126.00	2	12
Consolidated Telephone Co d/b/a CTC	21-62	2,040,278.70	121	979
Farmers Mutual Telephone Company	21-77	759,822.00	116	332
Federated Telephone Cooperative	21-81	537,399.00	85	248
Fond du Lac Communications Inc	Not filed	1,046,123.00		728
Garden Valley Telephone Coop	21-84	2,792,139.40	186	492
Gardonville Cooperative Telephone Association	21-73	63,903.00	10	24
Halstad Telephone Company	21-83	325,917.00	38	111
Interstate Telecommunications	21-180	51,748.60	153	402
LTD Broadband LLC	21-133	311,877,936.40	18,110	102,005
Midcontinent Communications	21-124	4,453,803.70	688	6,058
Next Link	21-31	3,736,316.00	384	1,408
Paul Bunyan Rural Telephone Coop	21-56	16,307,892.10	779	5,088
Red River Rural Telephone Assn dba Red River Communications	21-132	29,952.00	5	11
Roseau Electric Cooperative, Inc.	21-67	1,228,494.00	76	266
Savage Communications	21-53	6,090,479.10	492	4,541
Starlink Services, LLC	21-26	8,424,807.60	1,379	7,529
Wikstrom Telephone Company	21-57	983,637.00	93	228
Windstream Lakedale, Inc.	Not filed	6,548,964.10	257	2,899
Winnebago Cooperative Telecom	21-92	20,541.70	57	178
TOTALS		408,150,745.60	24,142	142,852

*Withdrawn, effective 3-17-21

** All Census Blocks already within ETC area.

II. LEGAL BACKGROUND

A. FEDERAL (FCC) REQUIREMENTS

An ETC designation denotes a company that has received federal funds financed by voice service ratepayers. As such, these companies are stewards of federal funds. A series of state and federal oversight protections are in place to ensure the trust placed in these companies to bring broadband and telecommunications service to

otherwise unserved locations. States determine whether applicants for federal Universal Service Funds should be certified as ETCs, and to do so, the starting point for States is to follow the rules promulgated by the FCC.

Some FCC requirements for ETC status are common to all types of funding provided by the FCC while other rules are specific to RDOF winning bidders. While not an exhaustive list, the most applicable Federal rules are listed below.

§54.7 (a) Intended Use. A carrier that receives federal universal service support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Each year, through their 481 filings, companies must attest to appropriate use of government funds.

§54.101 (a and c) Supported services for rural, insular, and high cost areas. Carriers must offer voice telephony, broadband services, and access to the emergency service offered by public safety organizations, such as 911.¹² This rule contains the requirement that RDOF ETCs must offer a stand-alone voice product. Interconnected VoIP services are permitted as the stand-alone service, but an application such as "over-the-top" VoIP is not acceptable.¹³

§54.201 (d (1) and (2)) generally. ETCs must offer the services that are supported by federal universal service support mechanisms using its own facilities or a combination of its own facilities and resale of another carrier's services; and advertise the availability of such services and the charges therefore using media of general distribution.

§54.101 (d) and §54.405 (a through c) Lifeline Service. An ETC must comply with the Lifeline requirements for ETCs (Subpart E). ETCs must agree to offer Lifeline service and publicize the service in a manner reasonably designed to reach those likely to qualify for the service. All materials describing the service must use easily understood language that explains that Lifeline is a government assistance program, the service is non-transferable, and only eligible consumers may enroll in the program, which is limited to one discount per household.

§54.805 (a) (b) (c). Rural Digital Opportunity Fund public interest obligations. Recipients of RDOF support are required to offer broadband service with latency suitable for real-time applications, including Voice over internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, at rates that are reasonably comparable to rates for comparable offerings in urban areas. Additionally, winning bidders must bid on connectivity to schools and libraries in response to FCC Form 470.

¹² See, also *RDOF Order* para.6: "After the auction, we will require Phase I support recipients to offer the required voice and broadband service to all eligible homes and small businesses within the awarded areas, without regard to the number of locations identified by the CAM, and instead as determined subsequently by the Bureau."

¹³ *FCC Public Notice 20-77*, June 11, 2020: "An ETC satisfies its obligation to "offer" qualifying services by being legally responsible for dealing with customer problems, providing quality of service guarantees, and meeting universal service fund-related requirements. Accordingly, a broadband provider may satisfy its voice obligation by offering voice service through an affiliate or by offering a managed voice solution (including VoIP) through a third-party vendor, **but a provider cannot simply rely on the availability of over-the-top voice options to satisfy this obligation.**"(emphasis added).

Additional FCC rules and requirements speak to ongoing requirements of ETCs, such as the requirement to file annually form 481¹⁴ and report milestones.¹⁵

B. STATE REQUIREMENTS, GRANTED THROUGH CONGRESSIONAL ACTION

State commissions certify ETCs. This authority is given by Congress through 47 U.S.C. §214 (e)(2):

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

This authority is further clarified by 47 U.S.C. §254:

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

In its *RDOF Order* the FCC noted: “We recognize the statutory role that Congress created for state commissions and the FCC with respect to ETC designations, and we do not disturb that framework.”¹⁶

The Minnesota Commission designates ETCs that serve in Minnesota under the authority granted by Congress. In 2005 the FCC released its Report and Order *In the Matter of Federal-State Joint Board on Universal Service*, in which the FCC recognized that the role of each state commission was unique to the circumstances of that state: “We decline to mandate that state commissions adopt our requirements for ETC designations. Section 214(e)(2)

¹⁴ 47 C.F.R. §314 Certification of support for eligible telecommunications carriers and *RDOF Order* para. 57.

¹⁵ *RDOF Order* para. 57.

¹⁶ *In the Matter of Rural Digital Opportunity Fund*, FCC 20-5 (2020) para. 92.

of the Act gives states the primary responsibility to designate ETCs and prescribes that all state designation decisions must be consistent with the public interest, convenience, and necessity.”¹⁷

The FCC went on to state: “. . .state commissions, as the entities most familiar with the service area for which ETC designation is sought, are particularly well-equipped to determine their own ETC eligibility requirements. **[S]tate commissions will continue to maintain the flexibility to impose additional eligibility requirements in state ETC proceedings, if they so choose.**”¹⁸

The ability for states to establish their own requirements consistent with the goal of universal service was also recognized by the FCC in its *2011 ICC/Transformation Order*, where the FCC noted:

The statute¹⁹ permits states to adopt additional regulations to preserve and advance universal service so long as they also adopt state mechanisms to support those additional substantive requirements.²⁰ Consistent with this federal framework, state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the statute and our implementing regulations, so long as those additional reporting requirements do not create burdens that thwart achievement of the universal service reforms set forth in this Order.²¹

In the *ICC/Transformation Order* the FCC further stated: “Our authority to promote universal service in this context does not depend on whether interconnected VoIP services are telecommunications services or information services under the Communications Act.”²² The FCC went on to explain:

If interconnected VoIP services are telecommunications services, our authority under section 254 to define universal service after “taking into account advances in telecommunications and information technologies and services” enables us to include interconnected VoIP services as a type of voice telephony service entitled to federal universal service support. And, as explained below, if interconnected VoIP services are information services, we have authority to support the deployment of broadband networks used to provide such services.²³

¹⁷ *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (2005), para. 61.

¹⁸ *Id.*

¹⁹ Referring to 47 U.S.C. 214 (e) and 254 (f).

²⁰ *Id.*

²¹ *In the Matter of Connect America Fund, et al.* Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (*ICC/Transformation Order*) (2011) para. 574.

²² *ICC/Transformation Order* para. 63

²³ *Id.* Fn.67.

The *Charter Order*²⁴ does not divest the Commission of its authority over the ETC certification process, the annual recertification process, or the application of State requirements that support universal service. The oversight of ETCs, particularly those entities that are not operating under a Minnesota Certificate of Authority, is not a matter of the state asserting jurisdiction over companies that are providing information services. Rather the Minnesota regulatory agencies perform their respective regulatory functions on behalf of the federal government with the specific duties laid out by Congress and the FCC to advance universal service and monitor the receipt and use of federal money.

III. APPROPRIATE REGULATIONS THE COMMISSION MAY CONSIDER FOR ETCs

While the FCC has clearly acknowledged that States may impose requirements upon ETCs, any requirement are to be “. . .not inconsistent with the Commission's (FCC's) rules to preserve and advance universal service”²⁵ The federal statute allows the Minnesota Commission to establish requirements specific to ETCs, including broadband and voice service of all technologies. So, while many rules that apply to telephone companies are also applicable for an ETC, not all rules are appropriate in the context of setting requirements for oversight of a federal program which has unique application in the state. The purpose of State requirements imposed upon ETCs is to preserve and advance universal service. Protections for consumers, providing a forum for consumer complaints, along with providing the services promised, are paramount for the preservation and advancement of universal service.

A. HISTORY OF MN COMMISSION ACTIONS WITH RESPECT TO ETCs

The Commission has long exercised its jurisdiction over ETCs, including ETCs that are not required to obtain a certificate of authority from the Commission to operate in Minnesota. For example, mobile wireless providers are not subject to Minnesota Chapter 237.²⁶ However, many mobile wireless providers are Lifeline only carriers, that is, the carrier receives reimbursement from federal funds for providing service to eligible low income customers, but does not otherwise receive high-cost support. The Commission, in granting Lifeline only ETC status to these companies, has imposed State requirements, including the filing of an informational tariff. For example, in granting ETC Designation to Virgin Mobile, the Commission ordered in part:

- Within 30 days of the Commission's Order, Virgin Mobile shall file a revised tariff or customer service agreement containing all rates, terms, conditions, service quality commitments, and other provisions that apply to its Lifeline service. The tariff or customer service agreement shall include a detailed description of its service offering, any additional services that may be added to it, and the areas in Minnesota where it is offered. Virgin Mobile shall attach a copy of the CTIA standards, to which it will adhere. and a copy of the Minnesota Rules, by which it has agreed to be bound, to its tariff for the purpose of public disclosure. Additionally, Virgin Mobile shall notify the Commission and the Department in writing immediately upon any change to

²⁴ See generally *Charter Advanced Services (MN), LLC et al. v. Nancy Lange, et al.*, 903 F.3d 715 (8th Cir. 2018) (“Charter Order”).

²⁵ 47 U.S.C. § 254 (f).

²⁶ Minn. Stat. § 237.01, sub.7: “However, none of chapter 237 applies to telephone company activities which conform to the definition of a radio common carrier.”

the Lifeline offering terms, conditions, or rates, or if it seeks to withdraw its Lifeline offering or any portion thereof. Virgin Mobile shall file a revised tariff or customer agreement page to reflect such changes.

- Virgin Mobile shall comply with the collection and remittance provisions of Minn. Stat. §§ 403.11 and 237.52.²⁷

Until the CAF II Reverse Auction 903²⁸, and with one exception (T-Mobile), the Commission has not been asked to grant ETC status for high cost companies that do not have certificates of authority, because the ETCs receiving federal grants were existing incumbent telephone companies. As telephone companies, the ETCs were subject to the rules and regulations of the Commission as they pertained to the voice portion of the service. As a result of the CAF II auction process, a few companies that had not previously appeared before the Commission filed for ETC status. Some of the new companies filed as a competitive local exchange carrier (CLEC), thus being subject to Commission rules and Minnesota Chapter 237.

Two of the CAF II Auction 903 petitioners, Broadband Corporation and LTD Broadband, did not seek a certificate of authority as a CLEC in conjunction with their petitions for ETC designation in Minnesota.²⁹ At the time, the Commission did not establish ETC specific regulations for the protection of consumers beyond what is mandated by the FCC. However, the choice of the Commission not to impose additional regulations at the time the companies petitioned for ETC status does not bar the Commission from doing so subsequently. For example, in docket Nos. P999/CI-17-509 and P999/CI-20-747, the Commission is examining the appropriate notice and outreach requirements for Lifeline only and High cost ETCs.

In this current round of ETC petitions, there are several companies that are requesting ETC status in order to gain access to federal funds that have not received a certificate of authority from the MN Commission. It is appropriate for the Commission to consider how it wishes to monitor these companies, and how it wishes to protect consumers purchasing services that are no longer a luxury, but a necessity. As with docket Nos. P999/CI-17-509 and P999/CI-20-747 the Commission may exercise its authority to establish State requirements that advance universal service for those ETCs that do not have a certificate of authority.

B. CONSUMER PROTECTIONS THAT THE COMMISSION MAY WISH TO CONSIDER

Many companies, including new applicants, indicated that they would adhere to the Consumer Protection requirements of the Minnesota Commission. For example, Garden Valley Telephone Cooperative (GVT) stated in its petition: "GVT is subject to, and complies with, the Commission's Rules pertaining to service quality and consumer protection."³⁰ LTD Broadband, LLC, a winning bidder in the CAF II 903 Auction, but not a CLEC in

²⁷ *Order Granting Limited ETC Designation*. In the Matter of the Petition of Virgin Mobile USA, L.P. for Designation as an Eligible Telecommunications Carrier. Docket No. P6863/M-11-314, December 7, 2012.

²⁸ See generally: <https://www.fcc.gov/auction/903>.

²⁹ State certification is required to obtain ETC status in numerous States.

³⁰ Petition of Garden Valley Cooperative Telephone Company, Docket No: P409/AM-21-84, p.4.

Minnesota, and the recipient of the largest amount of RDOF funds³¹ stated in its petition: “[Upon designation as an ETC to additional areas, LTD Broadband will satisfy all consumer protection and service quality standards as provided in 47 C.F.R § 54.202(a)(3), as well as all applicable state specific consumer protection and service quality standards.”³²

For companies that did not explicitly state agreement to adhere to Commission regulations or that stated opposition to the oversight of the Commission, the Department reached out via email with a list of 19 basic consumer protections that are in Commission Rules and state statute and asked the companies if they would agree to abide by the protections, and if not, why not.³³ See Attachment 1. These basic consumer protections adhere to CLECs and incumbent carriers, and reference to the statute or rule is included with each listed item. Not all rules and regulations that apply to CLECs and incumbent carriers are included in this list. The ETC applicant may be the only choice for broadband services for many of the consumers in the ETC designated locations that are receiving federal high cost support, and consumers that desire voice service often purchase a bundled broadband/voice service offering, some basic consumer protections are warranted. Consumers in such areas are vulnerable to improper practices that are possible in areas where choice is severely limited.

The 19 consumer protection items listed in Attachment 1 pertain to the most basic of protections and are do not interfere with the company’s ability to set rates. The protections, which all CLECs and ILECs also follow, allow all ETCs serving voice and broadband customers to operate on a level playing field. With these protections in place, no company can add charges for unwanted services to the customer’s bill, all customers will have meaningful access to the Commission’s Consumer Affairs Office, and companies will maintain plant and equipment. Having consistent consumer protection for all providers will allow the Commission to adhere to its mandate to “apply the same standards and criteria to all eligible telecommunications carriers” at the annual recertification of ETCs.³⁴

Responses to the Department’s request that carriers agree to the listed consumer protections varied. Most companies agreed to follow Commission established consumer protections as there appears to be some recognition that some consumer protections should exist for those customers receiving service made possible by government funds. Some companies did not specifically address consumer protections. Other companies felt they could pick and choose the protections they would agree to. Red River Communications, for example agreed to the majority of the 19 consumer protections, but objected to providing an informational tariff, objected to providing interest on deposits, and objected to informing the Commission about a pending sale or change of control. The response of Red River Rural Telephone Association summed up the objections of some of the ETCs by stating: “Interconnected VoIP is not regulated by the Commission.”

³¹ LTD Broadband received \$1.3 billion nationwide (15 states) -- \$311,877,936.40 in Minnesota. See FCC Public Notice DA20-1422 Winning Bidders Announced. December 7, 2020.

³² Petition of LTD Broadband, Docket No. P6095/M-21-133, p.9.

³³ Cable One dba Sparklight, Docket No. P7055/M-21-161, did not receive an email asking for agreement to abide by the consumer protections in Attachment 1, since the petition was not filed until March 8, 2021.

³⁴ Minnesota Statute § 237.435 ANNUAL UNIVERSAL SERVICE FUNDING CERTIFICATION. In determining whether to provide the annual certification of any eligible telecommunications carrier for continued receipt of federal universal service funding, the commission shall apply the same standards and criteria to all eligible telecommunications carriers

Savage Communications agreed to cooperate with investigations, complete intrastate calls, and comply with the TAP rules, but would not formally agree to the other consumer protections. In its petition, Savage Communications stated: "Savage Communications is a provider of broadband services and Voice Over the Top (VoIP) services. Neither of these services are regulated by the MN PUC."³⁵

The companies that seek to dictate the terms under which they would be subject to Commission oversight are in direct contradiction to the ability of the States to adopt regulations in the furtherance of universal service and the requirement of the Commission to apply the same standards and criteria³⁶

IV. REQUIREMENTS TO ENGAGE WITH TRIBAL AREAS

There is no requirement to explain Tribal engagement activities in order to receive ETC status from the Commission. However, Tribal engagement is a requirement of all ETCs for state recertification, which is set forth in 47 C.F.R. §54.313. Among the requirements, ETCs must file documents or other information demonstrating that the ETC had discussions with Tribal governments that, at a minimum, include:

- A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- Feasibility and sustainability planning;
- Marketing in a culturally sensitive manner;
- Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- Compliance with Tribal business and licensing requirements³⁷

In the past, very few companies have offered a meaningful response to this requirement beyond sending a letter to the Tribal chair seeking a meeting. In the 2019 ETC Certification, the Commission directed ". . . companies serving Tribal lands to fully cooperate with the Department, the Tribes, and the Commission to comply with C.F.R. 54.313 (a)(5), using Form 481.³⁸ In response, the Department (PUC staff were invited) and the Minnesota Telecom Alliance together set up a meeting on January 8, 2020, to discuss tribal engagement, inviting those companies known to have Tribal lands as part of their service territory. Integral to that meeting was the Department's Tribal Liaison, who provided valuable information about reaching out to the Tribal governments.³⁹ The Tribal Liaison, working with the MTA, established a list of contacts, both at the company and for the Tribes, to facilitate discussions. Unfortunately, the Pandemic resulted in the disruption of the outreach activity that was anticipated following that meeting.

For the RDOF winning bidders, the Department sent an email asking the companies to list the census blocks that serve Tribal areas, to encourage companies to start engaging with the Tribal governments in their area. Several companies, such as Starlink Services, Midco, Savage Communications, Halstad, CenturyLink and Paul Bunyan responded that they believed some of the census blocks awarded to them contained Tribal lands. Not all

³⁵ Petition of Savage Communications, Docket No. P7051/M-21-53, p.2.

³⁶ See above, section II B.

³⁷ 47 C.F.R. § 54.313 (5).

³⁸ *In the Matter of the Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of Federal Universal Service Support Required Pursuant to C.F.R. 54.313*, Docket No. P999/PR-19-8. October 17, 2020.

³⁹ The Commission Tribal Liaison was invited but was unable to attend.

companies responded. Cable One, and most notably, LTD Broadband, did not respond. LTD Broadband was the winning bidder in 18,110 census blocks in Minnesota, making it likely that some of the Census Blocks encompass Tribal lands.

While the Commission is not obligated to make a finding regarding service to Tribal lands as part of the ETC applications, the Department urges the Commission to put all ETCs on notice that the Commission expects reasonable efforts to be taken. The Commission may also wish to remind companies that they may reach out to the Tribal Liaisons of the Commission and the Department to help them determine the appropriate Tribal contacts and to provide assistance in connecting to the Tribes, as needed.

V. REQUIREMENTS TO PROVIDE STAND-ALONE VOICE SERVICE

As noted earlier, The FCC is clear that while interconnected VoIP is a valid offering for the voice only portion of the ETC service, over-the-top VoIP is not sufficient. In paragraph 139 of the RDOF Auction Notice (20-77), the FCC states (footnotes included):

An ETC satisfies its obligation to “offer” qualifying services by being legally responsible for dealing with customer problems, providing quality of service guarantees, and meeting universal service fund-related requirements.⁴⁰ Accordingly, a broadband provider may satisfy its voice obligation by offering voice service through an affiliate or by offering a managed voice solution (including VoIP) through a third-party vendor, but a provider cannot simply rely on the availability of over-the-top voice options to satisfy this obligation⁴¹

The FCC defines an “over-the-top” VoIP subscription on its instructions for completing FCC Form 477, stating that a provider should “count a subscription as an over-the-top subscription if you (including affiliates) do not supply (that is, do not sell to the end user) the high-capacity connection that terminates at the end user’s premises and delivers the interconnected VoIP service.”⁴²

Two companies, Savage Communications and Red River asserted in their petitions that they offered Voice over the Top (VoIP) services.”⁴³

⁴⁰ Cf. *Connect America Fund*, Report and Order, 28 FCC Rcd 7211, 7215, para. 9 (WCB 2013) (finding that it is not sufficient for a broadband provider to qualify as an “unsubsidized competitor” if a consumer must obtain voice service from a third party, because that broadband provider would not be offering a voice service) (*Phase II Challenge Process Order*).

⁴¹ See *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 707-08, paras. 42-43 (requiring Rural Digital Opportunity Fund recipients to offer standalone voice); cf. *Phase II Challenge Process Order*, 28 FCC Rcd 7224, n.21 (explaining that a broadband provider would be considered to be providing voice service if it did so through an affiliated competitive local exchange company or through “a managed voice solution obtained from a third party vendor . . . so long as the broadband provider is the entity responsible for dealing with any customer problems, and it provides quality of service guarantees to end user customers”).

⁴² <https://us-fcc.app.box.com/v/Form477Instructions>, p.23.

⁴³ See, for example, *Savage Communications* Petition, p 1, p.2.

If the statements of Savage and Red River were accurate, the Commission cannot certify either company as an ETC, as the companies do not sell to the end user the high-capacity connection that terminates at the end user's premises and delivers the interconnected VoIP service. When the customer does not receive broadband service, over-the-top VoIP is not possible and cannot satisfy the stand-alone voice obligation.

On March 24, 2021, Savage Communications filed a correction letter with the Commission stating that it had used the term "over the top" incorrectly, and Savage offers service no differently from other interconnected VoIP providers. The Department believes the same is true for Red River, and that the Attorney General's office had discussions with Red River to that effect.

Also, RDOF funded ETC must be prepared to provide stand-alone voice service to all customers in the RDOF funded areas on January 1, 2022, either through the ETC's own facilities or a combination of its own and other ETC's facilities.⁴⁴ As the FCC recognized, the time and cost to install the RDOF funded ETCs own network to serve customers will not happen by January 1, 2022. Also, beyond, January 1, 2022, the RDOF funded ETC may not find it economical to incur the expense to install a broadband network in an RDOF designated census block for customers that only desire stand-alone voice service. Yet, the RDOF funded ETC is required to provide the service.

Companies that are certified to provide telecommunications services in Minnesota may simply resell the service of the incumbent telephone company to satisfy the stand-alone voice requirement. However, those companies that do not have a certificate of authority in Minnesota, are not authorized to resell telecommunications service and are required to incur the expense to provide stand-alone voice service, even if that means installing their broadband network to the customer. The alternative for these providers is to seek authority to operate as a CLEC in Minnesota.

VI. LIFELINE REQUIREMENTS

Lifeline service is fundamental to the provision of Universal Service and all ETCs must advertise Lifeline "in a manner reasonably designed to reach those likely to qualify for the service."⁴⁵ The Commission has two proceedings open that address Lifeline and ETCs: P999/CI-17-509 and P999/CI-20-747. Further enhancements that the Commission determines in these two proceeding will help ensure low income consumers will benefit through increased awareness and participation in broadband services, which have become an integral part of many Minnesotans' lives.

VII. OTHER AREAS

Several requirements for ETC were not supplied by companies, such as pricing, advertising, promises to bid on all FCC Form 470 postings seeking broadband service for schools and libraries, results of speed and latency tests, and certification that funds are used only for the purpose they were granted. All of these requirements are required and necessary to ensure the appropriate use of Federal funds for the deployment of Universal Service. However, at this time, companies are not necessarily able to provide such information, and not doing so does

⁴⁴ *In the Matter of Rural Digital Opportunity Fund Connect America Fund*. WC Docket No. 10-126 and 10-90, Report and Order FCC 20-5 (2020) (*RDOF Order*), para. 139.

⁴⁵ 47 C.F.R. §54.101.

not affect the ability of the Commission to grant ETC status. The Commission may choose to remind the filing companies of its authority to review such matters in the future.

VIII. DEPARTMENT RECOMMENDATIONS SPECIFIC TO EACH PETITIONER

This section provides background information and provides recommendation specific to the individual petitions of each of the ETC applicants.

A. ARROWHEAD ELECTRIC COOPERATIVE, DOCKET NO. P6888/M-21-52

1. Background

On April 20, 2012, Arrowhead Electric Cooperative (Arrowhead) received its certificate of authority to operate as a Minnesota CLEC in Docket No. P6888/NA-12-231. Arrowhead operates in the Grand Marais, Hovland, Silver Bay and Tofte exchanges in Lake and Cook Counties. Arrowhead had not filed with the Commission for designation as an ETC prior to the current petition.

In the current docket, Arrowhead is requesting ETC designation in the census blocks awarded in the RDOF auction and is also requesting ETC designation in remaining portions of its CLEC service area.

As an award winner in Phase 1 of the FCC's RDOF auction, Arrowhead will receive \$18,462,273.10 in assigned support over 10 years for 4,879 assigned locations. The affected census blocks, listed in Exhibit 3 of Arrowhead's petition, are in Cook County.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in remaining portions of its CLEC service area, and in the locations designated for receipt of its RDOF award, subject to the conditions established by the Commission for all petitioners.

B. CABLE ONE VOIP, LLC DBA SPARKLIGHT, Docket No. P7055/M-21-161

1. Background

The petition filed by Cable One VoIP, LLC dba Sparklight (Cable One) for designation as an ETC to receive RDOF funding is the first filing made by the carrier in Minnesota. Cable One and its subsidiaries provide cable/video, Internet access, broadband, and voice services in 21 states, including Minnesota. Other subsidiaries of Cable One hold ETC designations in the states of Illinois, Missouri, and Oklahoma.

Cable One will receive \$1,671, in Minnesota, in assigned support over 10 years for 19 assigned locations, as part of the Wisper – CABO 904 Consortium. The areas where the carrier is seeking RDOF designation cover two census blocks in Clay county, which are listed in Exhibit 1 of the petition. The carrier is also requesting ETC designation for Lifeline only service in the Dilworth, Moorhead, and Oakport franchise areas of Clay County.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the two census block in Clay county, listed in Exhibit 1 of its petition, and also grant ETC designation for Lifeline only service in the Dilworth, Moorhead, and Oakport franchise areas of Clay County. In addition, Cable One should be subject to the conditions established by the Commission for all petitioners in the RDOF dockets.

C. CENTURYLINK COMMUNICATIONS, LLC, DOCKET NO. P5096/M-21-158

1. Background

CenturyLink Communications, LLC (CenturyLink) received its certificate of authority to provide long distance service in the Commission's December 8, 1994 Order in Docket No. P5096/NA-94-883. On October 13, 1999, CenturyLink received its certificate of authority to operate as a CLEC in Docket No. P5096/NA-99-939. CenturyLink's first filing for designation as an ETC is in the current docket. CenturyLink is an affiliate of other incumbent and competitive local carriers operating in Minnesota including, among others, Qwest Corporation dba CenturyLink.

CenturyLink will receive \$15,646,093.10 in assigned support for 10 years for 3,265 assigned locations in Minnesota. CenturyLink's RDOF census blocks fall outside the areas of its ILEC affiliates.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the census blocks designated for receipt of its RDOF award, subject to the conditions established by the Commission for all petitioners.

D. CONSOLIDATED TELEPHONE COMPANY DBA CTC, Docket No. P406/AM-21-62

1. Background

Consolidated Telephone Company dba CTC (Consolidated) currently operates as an ILEC serving the exchanges of Freedhem, Leader, Lincoln, Mission, Motley, Nokay Lake, Outing, Pillager, Randall, and Sullivan Lake. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's September 2, 2004 Order in Docket No. P406/NA-04-1212. Consolidated received its first designation as an ETC in the Commission's February 14, 2019 Order in Docket No. P406/AM-18-645.

Consolidated will receive \$2,040,278.70 in assigned support for 10 years for 979 assigned locations and 121 census blocks in Minnesota. The census blocks are located in the Deerwood, Aitkin, Bennettville, Crosby, Little Falls, Browerville, and Staples exchanges.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

E. FARMERS MUTUAL TELEPHONE COMPANY, DOCKET NO. P522/AM-21-77

1. Background

Farmers Mutual Telephone Company (Farmers) currently operates as an ILEC serving the exchanges of Bellingham, Cerro Gordo, and Marietta. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's November 28, 2007 Order in Docket No. P522/AM-07-1372 and the February 25, 2009 Order in Docket No. P522/AM-09-12. Farmers was designated as an ETC in the Commission's July 26, 2012 Order in Docket No. P522/AM-12-188 and the February 14, 2019 Order in Docket No. P522/AM-18-718.

Farmers will receive \$759,822 in assigned support for 10 years for 332 assigned locations in Minnesota.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

F. FEDERATED TELEPHONE COOPERATIVE, Docket No. P523/AM-21-81

1. Background

Federated Telephone Cooperative (Federated) currently operates as an ILEC serving the exchanges of Big Bend, Chokio, Correll, Danvers, Hancock, Holloway, Milan, and Odessa. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's October 13, 2014 Order in Docket No. P523/M-14-678, the April 3, 2015 Order in Docket No. P523/M-15-261, and the January 14, 2016 Order in Docket No. P523/SA-15-1074. Federated was designated as an ETC in the Commission's July 26, 2012 Order in Docket No. P523/AM-12-119 and the February 14, 2019 Order in Docket No. P523/AM-18-630.

Federated will receive \$537,399 in assigned support for 10 years for 248 assigned locations in Minnesota.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

G. GARDEN VALLEY TELEPHONE COOPERATIVE, Docket No. P409/AM-21-84

1. Background

Garden Valley Telephone Company (Garden Valley) currently operates as an ILEC serving the exchanges of Bagley, Beltrami, Brooks, Clearbrook, Erskine, Fertile, Fosston, Gatzke, Gonvick, Goodridge, Grygla, Gully, Lengby, Leonard, Maple Bay, McIntosh, Mentor, Minerva, Oklee, Plummer, Red Lake Falls, Shevlin, St. Hilaire, and Winger. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's April

5, 2017 Order in Docket No. P409/SA-17-175 and April 25, 2018 Order in Docket No. P409/SA-18-203 Garden Valley was designated as an ETC in the Commission's July 2, 2018 Order in Docket No. P409/M-17-837 and the February 14, 2019 Order in Docket No. P409/AM-18-607 .

Garden Valley will receive \$2,792,139.40 in assigned support for 10 years for 492 assigned locations in Minnesota. The census blocks are located in Mahnommen, Marshall, Pennington and Polk Counties.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

H. GARDONVILLE COOPERATIVE TELEPHONE ASSOCIATION, Docket No. P527/M-21-73

1. Background

Gardonville Cooperative Telephone Association (Gardonville) currently operates as an ILEC serving the exchanges of Brandon, Evansville, Garfield, and Millerville. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's April 9, 2015 Order in Docket No. P527/SA-277 and the June 1, 2017 Order in Docket No. P527/SA-17-301.

Gardonville will receive \$63,903 in assigned support for 10 years for 24 assigned locations in Minnesota.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

I. HALSTAD TELEPHONE COMPANY, Docket No. P530/M-21-83

1. Background

Halstad Telephone Company (Halstad) currently operates as an ILEC serving the exchanges of Bygland, Climax, Fisher, Halstad, Nielsville, and Shelby. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's February 22, 2016 and August 4, 2016 Orders in Docket No. P530/SA-16-84. Halstad has previously been granted ETC certification in the Commission's July 2, 2018 Order in Docket No. P530/M-17-838.

Halstad will receive \$325,917 in assigned support for 10 years for 24 assigned locations in Minnesota.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

J. INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC, Docket No. P515/AM-21-180

1. Background

Interstate Telecommunications Cooperative, Inc. (Interstate) currently operates as an ILEC operating in the East Elkton, East Gary, Hendricks, and Lake Benton exchanges. The carrier holds a certificate of authority to operate as an CLEC pursuant to the Commission's December 19, 2018 Order in Docket No. P515/SA-18-680.

Interstate will receive \$51,748.60 in assigned support for 10 years for 153 locations in Minnesota. The census blocks are located in Lincoln County.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

K. LTD BROADBAND LLC, Docket No. P6995/M-21-133

1. Background

LTD Broadband LLC (LTD) currently operates as a provider of broadband services and does not hold a certificate of authority from the Commission. LTD initially received ETC designation in the Commission's February 8, 2019 Order in Docket No. P6995/M-18-653.

LTD will receive \$311,877,936.40 in assigned support for 10 years for 102,005 assigned locations in Minnesota. Exhibit 1 of the petition lists the census blocks, which include locations in St. Louis, Carlton, Le Sueur, Morrison, Goodhue, Todd, Kandiyohi, Dakota, Isanti, Martin, Stearns, Steele, Carver, Wright, Waseca, Mower, Nicollet, Rice, Dodge, Traverse, Watonwan, Scott, Houston, Cottonwood, Olmsted, Washington, Clay, McLeod, Becker, Brown, Wabasha, Marshall, Wilkin, Winona, Big Stone, Faribault, Polk, and Lincoln Counties.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in locations designated for the receipt of its RDOF award. In addition, LTD should be subject to the conditions established by the Commission for all petitioners.

L. MIDCONTINENT COMMUNICATIONS, Docket No. P6186/M-21-124

1. Background

Midcontinent Communications (Midco) is a CLEC that received its certificate of authority to provide resold local services in the Commission's November 7, 2002 Order in Docket No. P6186/NA-02-1541. Midco then received its certificate of authority to provide resold local services in the Commission's March 26, 2007 Order in Docket No. P6186/NA-07-160. Midco subsequently expanded its service area in numerous other dockets. Midco received Commission approval for designation as an ETC in the Commission's December 12, 2006 Order in Docket No. P6186/M-06-1251. Midco then filed to expand its ETC status in Docket Nos. P6186/M-06-1348, P6186/M-16-39, P6186/M-17-230, and P6185/M-18-207, and P6186/SA-18-761.

Midco will receive \$4,453,803.70 in assigned support for 10 years for 6,058 assigned locations in Minnesota. The census blocks that are the subject of the RDOF award are located in the Pease, Glendorado and South Haven rate centers in Mille Lacs, Sherburne, and Stearns County.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in remaining portions of its CLEC service area and in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners. Also approve the proposal of Midco to expand its service area to cover the RDOF rate centers listed in Exhibit 1 of its petition, contingent upon the following:

1. Filing any necessary tariff updates.
2. Filing and receiving Commission approval of any necessary updates to its 911 plan.

M. AMG TECHNOLOGY INVESTMENT GROUP, LLC dba NEXTLINK INTERNET, Docket No. P7049/M-21-31

1. Background

AMG Technology Investment Group, LLC dba NextLink Internet (NextLink) currently operates as a provider of high-speed Internet and VoIP services. The company holds no certificate from the Commission. NextLink's first filing with the Commission is the current ETC designation petition.

Next Link will receive \$3,736,316 in assigned support for 10 years for 1,408 assigned locations in Minnesota. The census blocks are located in Jackson and Nicollet Counties.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in locations designated for the receipt of its RDOF award. In addition, NextLink should be subject to the conditions established by the Commission for all petitioners in the RDOF dockets.

N. PAUL BUNYAN RURAL TELEPHONE COOPERATIVE, Docket No. P423/AM-21-56

1. Background

Paul Bunyan Rural Telephone Cooperative dba Paul Bunyan Communications (Paul Bunyan) currently operates as an ILEC in the following exchanges: Ash River, Becida, Deer River, Kelliher, LaPorte, Northome, Ponemah, Puposky, Red Lake, Solway, Squaw Lake, Turtle River. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's Orders in Docket Nos. P423/NA-98-1674, P423/AM-02-1557, P423/AM-06-71, P423/AM-07-83, P423/AM-09-71, P423/AM-12-959, P423/AM-13-129, P423/SA-16-929, and P423/M-16-930. Paul Bunyan has previously been granted ETC certification in Docket Nos. P423/M-15-433, P423/M-17-854, and P423/M-18-605.

Paul Bunyan will receive \$16,307,892.10 in assigned support for 10 years for 5,088 assigned locations in Minnesota. The census blocks included in the RDOF award are located in Aitkin, Cass, Hubbard, Itasca, Koochiching, and St. Louis Counties.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

O. RED RIVER RURAL TELEPHONE ASSOCIATION DBA RED RIVER COMMUNICATIONS, Docket No. P558/M-21-132

1. Background

Red River Rural Telephone Association, dba Red River Communications (Red River) currently operates as an ILEC serving the exchanges of Barnesville, Fairmont, Kent and Rollag. The carrier is not currently certificated to operate as a CLEC. Red River's current petition for RDOF designation is being handled in Docket No. P558/M-21-132 and is its first ETC filing with the Commission pertaining to areas outside of its ILEC service areas.

Red River will receive \$29,952 in assigned support for 10 years for 11 assigned locations in Minnesota. The census blocks included in the RDOF award are located in northwestern Minnesota.

Red River has not agreed to comply with the requirements of Minn. Stat. section 237.231 on pending sales or changes of control and Minn. R. 7810.1600 and Minn. Stat. section 325E.02(b) on deposits.

2. Department Recommendation

As discussed in Section V, over-the-top VoIP cannot be used to satisfy the requirement to provide voice service. Red River may be misusing the term "over-the-top" and may provide acceptable interconnected VoIP service to satisfy the voice requirements. If the statement of Red River is accurate, the Commission cannot certify Red River as an ETC, as it does not sell to the end user the high-capacity connection that terminates at the end user's premises and delivers the interconnected VoIP service.

Red River should provide written evidence that it complies with the requirement to offer voice service that is not over-the-top VoIP prior to the Commission meeting where the Commission will consider the ETC applications of the RDOF winning bidders. If Red River provides this evidence, the Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award, subject to the conditions established by the Commission for all petitioners.

P. ROSEAU ELECTRIC COOPERATIVE, INC., Docket No. P6996/M-21-67

1. Background

Roseau Electric Cooperative, Inc. (Roseau) holds a certificate of authority to operate as a CLEC pursuant to the Commission's January 9, 2019 Order in Docket No. P6996/NA-18-676. The carrier has previously been granted ETC certification in Docket No. P6996/M-18-679.

Roseau will receive \$1,228,494 in assigned support for 10 years for 266 assigned locations in Minnesota.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award, subject to the conditions established by the Commission for all petitioners.

Q. SAVAGE COMMUNICATIONS, Docket No. P7051/M-21-53

1. Background

Savage Communications (Savage) currently operates as a provider of Internet and VoIP services. The company holds no certificate from the Commission. Savage's first filing with the Commission is the current ETC designation petition.

Savage will receive \$6,090,479.10 in assigned support for 10 years for 4,541 locations in Minnesota. The census blocks are located in Aitkin, Carlton, Crow Wing, Itasca, Mille Lacs, Pine, and St. Louis Counties.

Savage has not agreed to comply with the requirements of Minn. Stat. section 237.231 on pending sales or changes of control and Minn. R. 7810.1600 and Minn. Stat. section 325E.02(b) on deposits.

2. Department Recommendation

As the company corrected its use of the term "over-the-top" and the Department has no other issues with the filing, but reiterates the recommendation that customer service protections apply to customers of all RDOF recipients.

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award, subject to the conditions established by the Commission for all petitioners.

R. STARLINK SERVICES, LLC, Docket No. P7047/M-21-26

1. Background

Starlink Services, LLC (Starlink) is a wholly owned subsidiary of Space Exploration Technologies Corp. (or SpaceX). Starlink is not yet an operational company, but SpaceX intends for Starlink to become a provider of broadband and voice services using its RDOF award. The company holds no certificate from the Commission. Starlink's first filing with the Commission is the current ETC designation petition.

Starlink will receive \$8,424,807.60 in assigned support for 10 years for 7,529 locations in Minnesota. The census blocks are located in the Brainerd area, the north shore area, northern Minnesota, the area southwest of Bemidji and Nobles County.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

S. WIKSTROM TELEPHONE COMPANY, Docket No. P432/AM-21-57

1. Background

Wikstrom Telephone Company (Wikstrom) currently operates as an ILEC. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's September 16, 2009 Order in Docket No. P432/NA-09-984. Wikstrom has previously been granted ETC certification in the Commission's February 14, 2019 Order in Docket No. P432/M-18-549.

Wikstrom will receive \$983,637 in assigned support for 10 years for 228 locations in Minnesota. The census blocks included in the RDOF award are located in Kittson, Roseau and Marshall Counties.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

T. WINNEBAGO COOPERATIVE TELECOM, Docket No. P571/AM-21-92

1. Background

Winnebago Cooperative Telecom Association (Winnebago) currently operates as an ILEC operating in the Conger, Emmons, North Rake, and Twin Lakes exchanges. The carrier holds a certificate of authority to operate as a CLEC pursuant to the Commission's May 10, 2007 Order in Docket No. P571/AM-07-387 and the December 30, 2010 order in Docket No. P571/M-10-1217. Winnebago has previously been granted ETC certification in Docket No. P571/AM-14-147.

Winnebago will receive \$20,541.70 in assigned support for 10 years for 178 locations in Minnesota.

2. Department Recommendation

The Department recommends approval of the carrier's petition for designation as an ETC in the locations designated for receipt of its RDOF award subject to the conditions established by the Commission for all petitioners.

U. CONSOLIDATED COMMUNICATIONS OF MINNESOTA COMPANY

Consolidated Communications of Minnesota Company (Consolidated Communications) will receive a Rural Digital Opportunity Fund Phase I Auction award of \$11,126 for Minnesota, which covers 12 assigned locations in Minnesota.

In a March 18, 2021 email message to the Department, Consolidated Communications of Minnesota Company informed the Department that it is already authorized as an ETC, which is the only Commission requirement necessary for it to receive an RDOF award. Therefore, the carrier has not made a formal filing with the Commission, a separate docket number has not been assigned, and no action from the Commission is required.

V. WINDSTREAM/LAKEDALE

Windstream-Lakedale will receive a Rural Digital Opportunity Fund Phase I Auction award of \$6,548,964.10 for Minnesota, which covers 2899 assigned locations in Minnesota. As of these comments, the company has not filed, although the company signaled its intention to do so in an email response to a Department inquiry on March 16, 2021.

IX. DEPARTMENT RECOMMENDATIONS APPLICABLE TO ALL ETC PETITIONS

The Commission may choose to approve all ETC applications or may deny some or all of the applications. While desired information, particularly concerning Lifeline service, was not provided by all carriers, many carriers are understandably not in a position to provide such information. The Commission may wish to ask for such information at a future time, or in accordance with its annual review of ETC status from each company.

- 1) Consumer Protections.** The Commission has clear authority to adopt State specific requirements applicable to ETCs. Many of the ETC petitioners have agreed to comply with the consumer protections afforded by the Commission's rules and the Department supports the Commission accepting the representations by these companies that they will comply with Commission rules. For those ETC petitioners that have not broadly agreed to comply with the Commission rules, the Department recommends that the Commission adopt the consumer protections listed in Attachment 1 and open a new proceeding to determine if any of the protections listed therein should be changed or if any protections should be added.

Specifically, the Department recommends that the Commission state in its order:

- The Commission accepts the representations by those companies that stated in their petitions that they will comply with Commission rules.
- For those ETC petitioners that have not broadly agreed to comply with the Commission rules, the Commission adopts the consumer protections listed in Attachment 1.
- The Commission directs its Executive Secretary to open a new proceeding investigation to determine if any of the protections listed in Attachment 1 should be changed or if any protections should be added.

2) Stand-alone Voice. All ETCs are required to provide qualifying voice service, including stand-alone voice service, within a reasonable period of time upon request. The FCC has explicitly stated that over-the-top VoIP is not acceptable to satisfy the voice obligation.

The Department recommends that the Commission state in its order:

- Over-the-top VoIP does not satisfy the FCC requirement to provide voice service.
- All ETCs are required to provide 'stand-alone' voice service to consumers upon request, within a reasonable period of time. To the extent that an ETC has a certificate of authority to operate in Minnesota, it may satisfy this requirement by reselling the telecommunications service of another provider. If the ETC does not have a certificate of authority to operate in Minnesota, it will need to bring voice service to the customer that is not "over-the-top" VoIP.

3) Tribal Engagement. The Department recommends that the Commission state in its order:

- ETCs that serve Tribal lands are required to engage the tribes on those areas specified in 47 C.F.R. §54.313, at minimum.
- ETCs needing assistance with Tribal engagement should contact the Tribal Liaisons at the Commission and the Department for help.

4) Lifeline. The Department recommends that the Commission state in its order:

- ETC are to have information about Lifeline on their web site no later than the first offering of any ETC service to a consumer.
- ETCs recipients are encouraged to participate in Commission proceedings concerning Lifeline, including the current proceedings.

5) Service Area Expansion. The Department recommends that the Commission state in its order:

- ETCs that will be providing service subject to state jurisdiction, where they are not currently authorized to serve, must submit a petition for either new authority or a service area expansion, unless it is otherwise granted by the Commission in this Order.
- ETCs that will resell service subject to state jurisdiction of another provider to satisfy the requirement to provide stand-alone voice service must have authority from the Commission prior to providing the service.

ATTACHMENT 1
POTENTIAL CONSUMER PROTECTION REGULATIONS

- 1) **Informational Tariff or Price list.** Keep on file with the Department of Commerce an up to date price list of services that are related to the company's service offerings as an ETC. [ref. Minn. Stat. 237.07] [ref. Minn. Stat. 237.07]
- 2) **Commission and Department Investigation.** Cooperate with Commission/Department investigations and resultant Commission orders on matters associate with either federal or State ETC obligations. [ref. Minn. Stat. 237.081]
- 3) **Complete all calls.** Ensure that all intrastate calls will be completed. [ref Minn. Stat. 237.131]
- 4) **Provide credit for incorrect Directory Assistance calls.** Provide credit if a customer informs company of incorrect call. [ref. Minn. Stat. 237.155]
- 5) **Pending sale or change of control.** Inform the Commission regarding any pending sale or change in control of the company's operations, in conjunction with apprising the FCC [Minn. Stat. 237.231]
- 6) **Annual notice.** Send out, one time per year, plus immediately after becoming a customer, a notice in plain language concerning customer rights and obligations, including:
 - a. How to make a complaint
 - b. The existence of the Commission's Consumer Affairs Office (CAO) and its phone number. [ref. Min. Stat. 237.66]
- 7) **Telephone Assistance Plan.** Collect and remit the TAP fee when customers subscribe to voice service and apply the TAP credit to customers enrolled in Lifeline, if the customer subscribers to voice service either on a stand-alone basis or as part of a bundled service. [ref Minn. Stat. 237.69-237.72]
- 8) **Prohibition against Loading.** Agree not to charge customers for services for which they did not explicitly contract and to credit the customer's monthly bill upon complaint. [ref Minn. Stat. 237.663]
- 9) **Notice Requirements.** Send customers any required notices at least five days (excluding Sundays and legal holidays) in advance of the action being taken. [ref Minn. R. 7810.2300]
- 10) **Report Outages.** Promptly informing the regulatory agencies about any development or occurrence which disrupts service or affects the ability of a substantial number of customers to call 9-1-1. [Minn. R. 7810.0600]
- 11) **Anti-slamming.** Prevent the unauthorized switching of voice providers. [ref. Minn. Stat. 237.661]
- 12) **Customer billing.** Provide regular, correct customer bills, agree to provide credit for service outages. Provide to any customer who requests it, information on prices, charges, and services available. [ref. Minn. R. 7810.1400]

- 13) **Complaints.** Make personnel available to hear inquiries and complaints, investigate complaints, and respond to the PUC CAO office within 5 days of being forwarded a customer complaint. [ref. Minn. R. 7810.1100]
- 14) **Deposits.** Charge for deposits in accordance with Minn. R. 7810.1600 and Minn. Stat. 325E.02 (b)
- 15) **Disconnections.** Disconnect customers only in accordance with Minn. R. 7810.1800, 7810.1900, 7810.2000, and 7810.2100.
- 16) **Bill Disputes.** Agree not to disconnect over any disputed amount without investigating first, and allowing for the establishment of an escrow account [ref. Minn. R. 7810.2400]
- 17) **Resolve interruptions of service promptly.** [ref. Minn. R. 7810.5800]
- 18) **Customer Trouble Reports.** Receive customer trouble reports 24 hours per day in accordance with Minn. R. 7810.5900
- 19) **Maintain plant and equipment.** Furnish and maintain adequate plant, equipment and facilities to consistently meet required standards of speed, quality, and latency. [ref.7810.4900]

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Comments**

Docket No. P999/CI-21-86; P6888/M-21-52; P7055/M-21-161; P5096/M-21-158; P406/AM-21-62; P522/AM-21-77; P523/AM-21-81; P409/AM-21-84; P527/M-21-73; P530/M-21-83; P515/AM-21-180; P6995/M-21-133; P6186/SA-21-124; P7049/M-21-31; P423/AM-21-56; P558/M-21-132; P6996/M-21-67; P7051/M-21-53; P7047/M-21-26; P432/M-21-57; and P571/AM-21-92

Dated this 26th day of March 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Adams	Sharon.e.adams@verizon.com	XO Communications Services, LLC	22001 Loudoun Cty Pkw Ashburn, VA 20147	Electronic Service	No	OFF_SL_21-26_M-21-26
Scott	Anderson	scott.anderson@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-26_M-21-26
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	OFF_SL_21-26_M-21-26
Vince	Aragona	varagona@neonetworkdevelopment.com	Neo Network Development Inc.	620 N River Rd Naperville, IL 60563	Electronic Service	No	OFF_SL_21-26_M-21-26
David	Arvig	david.arvig@arvig.com	East Otter Tail Telephone Company	c/o Arvig Communication Systems 160 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-26_M-21-26
Steven	Avromov	savromov@bullseyetelecom.com	BullsEye Telecom, Inc.	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	OFF_SL_21-26_M-21-26
Donald	Bacon	db0559@att.com	AT&T	555 Reynolds St Gadsden, AL 35901	Electronic Service	No	OFF_SL_21-26_M-21-26
Melissa	Balu	mbalu@mediacomcc.com	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way Mediacom Park, NY 10918	Electronic Service	No	OFF_SL_21-26_M-21-26
Karly	Baraga Werner	Karly_Baraga-Werner@comcast.com	Comcast Phone of Minnesota, Inc.	10 River Park Plaza St. Paul, MN 55107	Electronic Service	No	OFF_SL_21-26_M-21-26
John	Barnicle	jbarnicle@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, ste 2730 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edine	Bayne	eb4965@att.com	Teleport Communications America, LLC	225 W Randolph St, 27C350 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26
Carl	Billek, Esq.	carl.billek@idt.net	IDT America Corp.	520 Broad St Newark, NJ 07102	Electronic Service	No	OFF_SL_21-26_M-21-26
Geoff	Bloss	gbloss@bcmone.com	BCM One Group Holdings, Inc.	7676 Forsyth Blvd Ste 2700 Saint Louis, MI 10017	Electronic Service	No	OFF_SL_21-26_M-21-26
Richard M	Boudria Jr	r.boudria@bcntele.com	BCN Telecom, Inc.	1200 Mt Kemble Ave FL 3 Morristown, NJ 07960	Electronic Service	No	OFF_SL_21-26_M-21-26
Kristina	Bourget	tina.bourget@wintechnology.com	WIN, LLC	4955 Bullis Farm Rd Eau Claire, WI 54701	Electronic Service	No	OFF_SL_21-26_M-21-26
Kristina	Bourget	kbourget@wins.net	WIN, LLC	4955 Bullis Farm Road Eau Claire, WI 54701	Electronic Service	No	OFF_SL_21-26_M-21-26
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-26_M-21-26
Lance	Casey	lance.casey@consolidated.com	Consolidated Communications of Minnesota Company	221 E Hickory St PO Box 3248 Mankato, MN 56002	Electronic Service	No	OFF_SL_21-26_M-21-26
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda J	Cicco	linda.cicco@bt.com	BT Americas Inc.	11440 Commerce Park Dr Reston, VI 20191	Paper Service	No	OFF_SL_21-26_M-21-26
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_21-26_M-21-26
Carol	Criscuolo	cc7824@att.com	Teleport Communications America, LLC	1313 Ellison Ave Bronx, NY 10461	Electronic Service	No	OFF_SL_21-26_M-21-26
Brian	Crommett	bcrommett@702communications.com	VAL-ED Joint Venture, LLP dba 702 Communications	702 Main Avenue Moorhead, MN 56560	Electronic Service	No	OFF_SL_21-26_M-21-26
Legal	Department	legalnotices@acninc.com	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Electronic Service	No	OFF_SL_21-26_M-21-26
Ralph	Dichy	rdichy@mettel.net	Metropolitan Telecommunications of Minnesota, Inc. dba MetTel	55 Water St FL 31 New York, NY 10041	Electronic Service	No	OFF_SL_21-26_M-21-26
Matt	Diebold	mdiebold@bigrivercompany.com	Big River Telephone Company, LLC	24 S Minnesota Ave Cape Girardeau, MO 63702	Electronic Service	No	OFF_SL_21-26_M-21-26
Heather	Dobson	heather.dobson@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Dr St Louis, MO 63131	Electronic Service	No	OFF_SL_21-26_M-21-26
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_21-26_M-21-26
Cynthia	Firstman	cat@airespring.com	Airespring, Inc.	6060 Sepulveda Blvd. Suite 220 Van Nuys, CA 91411	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Fletcher	tfletcher@aecom.com	AEX Communications, Inc.	4445 W 77th St Ste 102 Edina, MN 55435-5134	Electronic Service	No	OFF_SL_21-26_M-21-26
Lisa Jill	Freeman	ljfreeman@bandwidth.com	Bandwidth.com CLEC, LLC	Venture Center III - 5th Floor 900 Main Campus Drive Raleigh, NC 27606	Electronic Service	No	OFF_SL_21-26_M-21-26
Ted	Hankins	ted.hankins@lumen.com	Qwest Corporation dba CenturyLink	100 CenturyLink Drive Monroe, LA 71203	Electronic Service	No	OFF_SL_21-26_M-21-26
Jarrod	Harper	jarrod.harper@windstream.com	Broadview Networks, Inc.	4001 N Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_21-26_M-21-26
Kim	Havins	khavins@broadbanddynamics.com	Broadband Dynamics, LLC	8757 E Via De Commercio FL 1 Scottsdale, AZ 85258	Electronic Service	No	OFF_SL_21-26_M-21-26
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_21-26_M-21-26
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_21-26_M-21-26
Carrie	Kern Taggart	cak@wiktel.com	Wikstrom Telephone Company Inc	212 South Main PO Box 217 Karlstad, MN 56732	Electronic Service	No	OFF_SL_21-26_M-21-26
Kiley	Kruger	kkruiger@popp.com	POPP.com, Inc.	620 Mendelssohn Ave N Golden Valley, Minnesota 55441	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Lancaster	andy.m.lancaster@sprint.com	Sprint Communications Company L. P.	6200 Sprint Pkwy Overland Park, KS 66251	Electronic Service	No	OFF_SL_21-26_M-21-26
Jim	Lundberg	jcl@velocitytelephone.com	Velocity Telephone Inc	656 Mendelssohn Ave N Golden Valley, MN 55427	Electronic Service	No	OFF_SL_21-26_M-21-26
STEPHANIE	MARSH	stephanie.d.marsh@windstream.com	Windstream Services, LLC.	4001 N Rodney Parham Rd Mailstop: 1170 B1F2-12A Little Rock, AR 72212	Electronic Service	No	OFF_SL_21-26_M-21-26
Laura	Matosian	regulatory@comtech21.com	COMTECH 21, LLC	One Barnes Park South Wallingford, CT 6492	Electronic Service	No	OFF_SL_21-26_M-21-26
Jessica	Matushek	jessica.matushek@frontiercorp.com	Frontier Communications Corporation	100 CTE Drive Dallas, PA 18612	Paper Service	No	OFF_SL_21-26_M-21-26
Daniel E	Meldazis	daniel.meldazis@inteliquent.com	ANPI Business, LLC	550 W Adams St Ste 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-26_M-21-26
Monty	Morrow	montymorrow@nuvera.net	Nuvera	235 Franklin St Hutchinson, MN 55350	Electronic Service	No	OFF_SL_21-26_M-21-26
Keith	Nussbaum	keith@preferredlongdistance.com	Preferred Long Distance, Inc.	Suite 350 16830 Ventura Blvd. Encino, CA 91436	Electronic Service	No	OFF_SL_21-26_M-21-26
Becky	Parker	bparker@nextera.net	Nextera Communications, LLC	13850 Bluestem Ct Suite 150 Baxter, MN 56425	Electronic Service	No	OFF_SL_21-26_M-21-26
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Porter	sporter@powernetco.com	PNG Telecommunications, Inc.	8805 Governor's Hill Drive Suite 250 Cincinnati, Ohio 45249	Electronic Service	No	OFF_SL_21-26_M-21-26
R. Edward	Price	Ted.Price@spacex.com	Space Exploration Technologies Corp.	1155 F Street NW Ste 475 Washington, DC 20004	Electronic Service	No	OFF_SL_21-26_M-21-26
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	OFF_SL_21-26_M-21-26
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_21-26_M-21-26
Jennifer	Richter	jrichter@akingump.com	Akin Gump Strauss Hauer & Feld LLP	2001 K St. NW Washington, DC 20006	Electronic Service	No	OFF_SL_21-26_M-21-26
Alan	Rosenberg	arosenberg@accessmedia3.com	Access Media Holdings, LLC	900 Commerce Dr Ste 200 Oak Brook, IL 60523	Electronic Service	No	OFF_SL_21-26_M-21-26
Vince	Rosenthal	jr2762@att.com	AT&T Services, Inc.	225 W. Randolph St. Chicago, IL 60606	Electronic Service	No	OFF_SL_21-26_M-21-26
Robert	Russell	brussell@dmv.com	Local Access LLC	11442 Lake Butler Boulevard Windermere, FL 34786	Electronic Service	No	OFF_SL_21-26_M-21-26
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-26_M-21-26
Ronald A	Sheehan	Ronald.Sheehan@fusionconnect.com	Fusion Connect LLC	695 Route 46 W Ste 200 Fairfield, NJ 07004	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Sollenberger	msollenberger@firstcomm.com	First Communications, LLC	3340 W Market St Akron, OH 44333	Electronic Service	No	OFF_SL_21-26_M-21-26
Kevin	Sullivan	Kevin.Sullivan@gtt.net	GC Pivotal, LLC	1595 Peachtree Pkwy Ste 204-337 Cumming, GA 30041	Electronic Service	No	OFF_SL_21-26_M-21-26
Gwen	Sullivan	gsullivan@nttservices.com	Nebraska Technology & Telecommunications, Inc.	2308 S. 156th Circle Omaha, NE 68130	Electronic Service	No	OFF_SL_21-26_M-21-26
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	OFF_SL_21-26_M-21-26
Joseph	Topel	joe.topel.ext@orange.com	France Telecom Corporate Solutions L.L.C.	Coppermine Commons Bldg #2 13865 Sunrise Valley Dr Ste. 425 Herndon, VA 20171-6190	Electronic Service	No	OFF_SL_21-26_M-21-26
Alex	Valencia	alex.valencia@lingo.com	Lingo Communications North, LLC	400 E Las Colinas Blvd Suite 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-26_M-21-26
Alex	Valencia	avalencia@impacttelecom.com	Matrix Telecom, LLC	400 Las Colinas Blvd E Ste 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-26_M-21-26
Rebecca	West	jcui@onecommunications.com	CTC Communications Corp. d/b/a EarthLink Business	2851 Charlevoix Dr SE Ste 209 Grand Rapids, MI 49546	Electronic Service	No	OFF_SL_21-26_M-21-26

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-52_M-21-52
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-52_M-21-52
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_21-52_M-21-52
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_21-52_M-21-52
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-52_M-21-52
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-52_M-21-52
John	Twiest	jtwest@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)	PO Box 39 5401 W Hwy 61 Lutsen, MN 55612	Electronic Service	No	OFF_SL_21-52_M-21-52

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-53_M-21-53
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-53_M-21-53
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-53_M-21-53
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_21-53_M-21-53
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_21-53_M-21-53
Scott	Savage	ssavage@scicable.com	Savage Communications	PO Box 810 115 Tobies Mill Pl Hinkley, MN 55037	Electronic Service	No	OFF_SL_21-53_M-21-53
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_21-53_M-21-53
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-53_M-21-53

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@fr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-57_M-21-57
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-57_M-21-57
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-57_M-21-57
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_21-57_M-21-57
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_21-57_M-21-57
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_21-57_M-21-57
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-57_M-21-57
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-57_M-21-57

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-62_M-21-62
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-62_M-21-62
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_21-62_M-21-62
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_21-62_M-21-62
Mark	Roach	mark@goctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_21-62_M-21-62
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_21-62_M-21-62
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-62_M-21-62
Kristi	Westbrock	Kristi@goctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401-0972	Electronic Service	No	OFF_SL_21-62_M-21-62

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-67_M-21-67
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-67_M-21-67
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_21-67_M-21-67
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_21-67_M-21-67
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-67_M-21-67
Tracey	Stoll	tstoll@roseauelectric.com	Roseau Electric Cooperative, Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_21-67_M-21-67
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-67_M-21-67

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-73_M-21-73
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-73_M-21-73
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_21-73_M-21-73
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_21-73_M-21-73
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-73_M-21-73
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-73_M-21-73
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_21-73_M-21-73

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_21-77_AM-21-77
Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56221	Electronic Service	No	OFF_SL_21-77_AM-21-77
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-77_AM-21-77
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-77_AM-21-77
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-77_AM-21-77
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_21-77_AM-21-77
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_21-77_AM-21-77
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-77_AM-21-77
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-77_AM-21-77

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_21-81_AM-21-81
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-81_AM-21-81
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-81_AM-21-81
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_21-81_AM-21-81
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_21-81_AM-21-81
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_21-81_AM-21-81
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-81_AM-21-81

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-84_AM-21-84
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-84_AM-21-84
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-84_AM-21-84
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-84_AM-21-84
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_21-84_AM-21-84
Mark	Klinkhammer	mark.klinkhammer@gvtel.net	Garden Valley Telephone Company	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-84_AM-21-84
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_21-84_AM-21-84
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-84_AM-21-84
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-84_AM-21-84

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-86_Official
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_21-86_Official
Patrick	Caron	Patrick.Caron@cableone.biz	Cable One, Inc.	210 E Earll Dr Phoenix, AZ 85012	Electronic Service	No	OFF_SL_21-86_Official
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-86_Official
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_21-86_Official
Joshua	Guyan	jguyan@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
Kara	Hartman	kara.hartman@aspirenetworks.com	Aspire Networks 2, LLC	PO Box 349 Buford, GA 30515	Electronic Service	No	OFF_SL_21-86_Official
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-86_Official
Chris M.	Laughlin	claughlin@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
Phillip R.	Marchesiello	pmarchesiello@wbklaw.com	Wilkinson Barker Knauer, LLP	1800 M Street NW Suite 800N Washington, D.C. 20036	Electronic Service	No	OFF_SL_21-86_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
R. Edward	Price	Ted.Price@spacex.com	Space Exploration Technologies Corp.	1155 F Street NW Ste 475 Washington, DC 20004	Electronic Service	No	OFF_SL_21-86_Official
Eric	Pyland	epyland@team.nxlink.com	AMG Technology Investment Group, LLC	d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087	Electronic Service	No	OFF_SL_21-86_Official
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_21-86_Official
Jennifer	Richter	jr Richter@akingump.com	Akin Gump Strauss Hauer & Feld LLP	2001 K St. NW Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
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_21-86_Official
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-86_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-92_AM-21-92
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-92_AM-21-92
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-92_AM-21-92
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_21-92_AM-21-92
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	OFF_SL_21-92_AM-21-92
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_21-92_AM-21-92
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_21-92_AM-21-92
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_21-92_AM-21-92

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_21-158_M-21-158
Greg	Arvig	GARVIG@NEXTERA.NET	Nextera Communications	Suite 100 7115 Forthum Rd Baxter, MN 56425	Electronic Service	No	OFF_SL_21-158_M-21-158
John	Barnicle	jbarnicle@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, ste 2730 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Kyle	Bertrand	kyle.bertrand@inteliquent.com	Onvoy, LLC	550 W Adams St Ste 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-158_M-21-158
Geoff	Bloss	gbloss@bcmone.com	BCM One Group Holdings, Inc.	7676 Forsyth Blvd Ste 2700 Saint Louis, MI 10017	Electronic Service	No	OFF_SL_21-158_M-21-158
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-158_M-21-158
Jenna	Brown	jbrown@vcmsolutions.com	QuantumShift Communications, Inc	12657 Alcosta Blvd Ste 418 San Ramon, CA 94583	Electronic Service	No	OFF_SL_21-158_M-21-158
Gary	Case	gary.case@verizon.com	Verizon	600 Hidden Ridge Irving, TX 75038	Electronic Service	No	OFF_SL_21-158_M-21-158
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_21-158_M-21-158
Shira	Cook	shira.cook@zayo.com	Zayo Group, LLC	1805 29th St Ste 2050 Boulder, CO 80301	Electronic Service	No	OFF_SL_21-158_M-21-158
Corbin	Coombs	cc2862@att.com	AT&T Corp.	225 West Randolph Street Z2 Room 17A140 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Heather	Dobson	heather.dobson@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Dr St Louis, MO 63131	Electronic Service	No	OFF_SL_21-158_M-21-158
Andoni	Economou	aeconomou@mettel.net	Metropolitan Telecommunications of Minnesota, Inc.	55 Water St FL 31 New York, NY 10041	Electronic Service	No	OFF_SL_21-158_M-21-158
Carey	Gagnon	carey.gagnon@verizon.com	Verizon	3131 S Vaughn Way 5th Floor Aurora, CO 80014	Electronic Service	No	OFF_SL_21-158_M-21-158
John	Harrington	jharrington@inteliquent.com	Neutral Tandem-Minnesota	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Joe	Hartman	joe.hartman@acninc.com	ACN Communications Services, Inc.	1000 Progress PI NE Concord, NC 28025	Electronic Service	No	OFF_SL_21-158_M-21-158
Stacey	Hines	stacey.hines@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Drive St. Louis, Missouri 63131	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ruth	Holder	ruth.holder@bt.com	BT Communications Sales LLC	11440 Commerce Park Dr Reston, VA 20191	Electronic Service	No	OFF_SL_21-158_M-21-158
Julian	Jacquez	jjacquez@bcntele.com	BCN Telecom, Inc.	1200 Mt. Kemble Ave. 3rd Fl. Harding Township, NJ 07960	Electronic Service	No	OFF_SL_21-158_M-21-158
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_21-158_M-21-158
Jim	Lundberg	jcl@velocitytelephone.com	Velocity Telephone Inc	656 Mendelssohn Ave N Golden Valley, MN 55427	Electronic Service	No	OFF_SL_21-158_M-21-158
Laurie	McDonough	laurie.mcdonough@acninc.com	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Electronic Service	No	OFF_SL_21-158_M-21-158
Sadia	Mendez	smendez@bcmone.com	BCM One, Inc.	521 5th Ave FL 14 New York, NY 10175	Electronic Service	No	OFF_SL_21-158_M-21-158
Stephen	Meradith	WCI.Minnesota.govaffairs@windstream.com	McLeod USA Telecommunications Services, LLC	Windstream Communications 4001 Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_21-158_M-21-158
Richard	Monto	rmonto@inteliquent.com	Neutral Tandem-Minnesota, LLC	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Bruce A	Ney	bruce.ney@att.com	AT&T Services, Inc.	816 Congress Ave Ste 1100 Austin, TX 78701	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Osborne	dosborne@localaccessllc.com	Local Access LLC	11442 Lake Butler Blvd Windermere, FL 34786	Electronic Service	No	OFF_SL_21-158_M-21-158
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_21-158_M-21-158
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_21-158_M-21-158
Robert	Russell	brussell@dmv.com	Local Access LLC	11442 Lake Butler Boulevard Windermere, FL 34786	Electronic Service	No	OFF_SL_21-158_M-21-158
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-158_M-21-158
Lisa	Sichler	lsichler@bullseyetelecom.com	Bullseye Telecom	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	OFF_SL_21-158_M-21-158
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-158_M-21-158
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-158_M-21-158
Alex	Valencia	avalencia@impacttelecom.com	Matrix Telecom, LLC	400 Las Colinas Blvd E Ste 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-158_M-21-158
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-158_M-21-158
Brian	Witte	bw8912@att.com	Teleport Communications America, LLC	C/O Global Connects / AT&T Corp. One AT&A Way Rm 4A252B Bedminster, NJ 07921	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Caron	Patrick.Caron@cableone.biz	Cable One, Inc.	210 E Earll Dr Phoenix, AZ 85012	Electronic Service	No	OFF_SL_21-161_M-21-161
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-161_M-21-161
Angela	Collins	acollins@cahill.com	Ionex Communications North, Inc. dba Birch Communications	1990 K St NW Ste 950 Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
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_21-161_M-21-161
Cherie R.	Kiser	ckiser@cgrdc.com	Cahill Gordon & Reindel LLP	1990 K St NW Ste 950 Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
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_21-161_M-21-161
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-161_M-21-161

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tracy	Bandemer	Tracy.Bandemer@itccoop.com	Interstate Telecommunications Cooperative, Inc..	312 4th St W PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-180_M-21-180
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-180_M-21-180
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_21-180_M-21-180
John	Kuykendall	jkuykendall@jsitel.com	JSI on behalf of Interstate Telecommunications Cooperative, Inc.	7852 Walker Dr Ste 200 Greenbelt, MD 20770	Electronic Service	No	OFF_SL_21-180_M-21-180
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_21-180_M-21-180
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_21-180_M-21-180

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-31_M-21-31
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_21-31_M-21-31
Joshua	Guyan	jguyan@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-31_M-21-31
Chris M.	Laughlin	claughlin@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-31_M-21-31
Eric	Pyland	epyland@team.nxlink.com	AMG Technology Investment Group, LLC	d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087	Electronic Service	No	OFF_SL_21-31_M-21-31
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_21-31_M-21-31
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-31_M-21-31

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-56_M-21-56
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-56_M-21-56
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-56_M-21-56
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_21-56_M-21-56
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_21-56_M-21-56
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_21-56_M-21-56
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_21-56_M-21-56
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-56_M-21-56

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-83_M-21-83
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-83_M-21-83
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_21-83_M-21-83
Mark	Forseth	markforseth@rrv.net	Halstad Telephone Company	Box 55 345 2nd Ave West Halstad, MN 56548	Electronic Service	No	OFF_SL_21-83_M-21-83
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_21-83_M-21-83
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_21-83_M-21-83
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-83_M-21-83

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-124_SA-21-124
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-124_SA-21-124
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-124_SA-21-124
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_21-124_SA-21-124
Gail	Gauthier	gail.gauthier@windstream.com	Windstream, Business Telecom, CTC Comm, Deltacom, EarthLink B, McLeadUSA, PAETEC, Talk America	4001 N Rodney Parham Rd Mailstop: B01 F2-12A Little Rock, AR 72212-2442	Electronic Service	No	OFF_SL_21-124_SA-21-124
Patrick J	Mastel	pat.mastel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-124_SA-21-124
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_21-124_SA-21-124
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_21-124_SA-21-124
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-124_SA-21-124
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-124_SA-21-124

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mikaela	Burma	Mikaela.Burma@vantagepoint.com	VantagePoint	2211 N Minnesota St Mitchell, SD 57301	Electronic Service	No	OFF_SL_21-132_M-21-132
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-132_M-21-132
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_21-132_M-21-132
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_21-132_M-21-132
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-132_M-21-132
Tom	Steinolfson	toms@redrivercomm.com	Red River Communications	510 Broadway Abercrombie, ND 58001	Electronic Service	No	OFF_SL_21-132_M-21-132
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-132_M-21-132

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-133_M-21-133
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_21-133_M-21-133
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-133_M-21-133
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_21-133_M-21-133
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_M-21-133
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_21-133_M-21-133
Gregory	Whiteaker	greg@hermanwhiteaker.com	Herman & Whiteaker, LLC	6720B Rockledge Drive Suite 150 Bethesda, MD 20817	Electronic Service	No	OFF_SL_21-133_M-21-133
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-133_M-21-133