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November 9, 2020

**VIA E-FILING**

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

Re: **In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High Cost ETCs**

**Docket No. P999/CI-20-747**

Dear Mr. Seuffert:

Enclosed are the Comments of Minnesota Telecom Alliance regarding the above-referenced matter. Please feel free to let me know if there are questions about this filing.

Sincerely,

/s/ R. Cameron Winton

R. Cameron Winton

On behalf of the Minnesota Telecom Alliance

Enclosure

cc: Service List

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

Katie Sieben	Chair
Joseph K. Sullivan	Vice Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

**In the Matter of a Commission  
Inquiry into the Advertising,  
Outreach, and Offering of  
Lifeline by High Cost ETCs**

**Docket No. P999/CI-20-747**

**COMMENTS OF MINNESOTA TELECOM ALLIANCE**

**INTRODUCTION**

The Minnesota Telecom Alliance (“MTA”) submits the following comments in regard to the Commission’s Inquiry into the Advertising, Outreach, and Offering of Lifeline by High Cost ETCs. MTA is a trade association comprised of more than 70 telecommunications companies across Minnesota. MTA members range from family-owned companies and local cooperatives with storefronts on Main Street Minnesota to companies with multi-state operations. MTA’s members provide voice, video, and high-speed internet to Minnesotans in every area of the state. All of MTA’s member companies are ETCs receiving high-cost support.

In accordance with the Commission’s request for comments in this docket, MTA member companies have filed information regarding (1) the number of Lifeline customers each has; and (2) how those member companies advertise the Lifeline program to potential participants. *See*, Docket No. P999/CI-20-747. MTA submits these comments to summarize

key industry-wide points.

MTA's member companies use a wide array of methods to educate consumers about the Lifeline benefits available to them. As detailed in the various submissions currently before the Commission, MTA member companies advertise Lifeline to consumers by putting information about the program in the following communications, at the expense of those companies:

Targeted to customers:

1. welcome packet sent to new subscribers;
2. monthly bill;
3. company newsletter;
4. letters and brochures sent via U.S. Mail;
5. phone book distributed to all households in service area;
6. brochures offered to customers signing up in company's office; and
7. company website.

Promotions to broader public:

1. advertisements in local newspapers;
2. advertisements on social media (Facebook and Instagram); and
3. letters to area social service offices, encouraging social service staffers to distribute brochures about Lifeline program to eligible individuals.

MTA recognizes that various stakeholders would like to see greater participation in the Lifeline program by eligible consumers. As described above, MTA members undertake

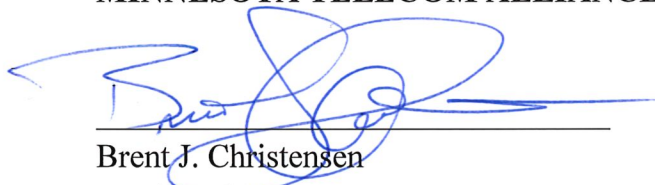
significant advertising of the Lifeline program at their own expense. Accordingly, if the Commission wishes to increase participation in the Lifeline program, MTA encourages the Commission to explore options other than mandating additional advertising.

**CONCLUSION**

MTA's member companies will continue to use a wide array of methods to educate consumers about the Lifeline benefits available to them. MTA appreciates the opportunity to submit these comments.

Dated this 9<sup>th</sup> day of November, 2020.

**MINNESOTA TELECOM ALLIANCE**



Brent J. Christensen

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**STATE OF MINNESOTA**

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

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Re: **In the Matter of a Commission Inquiry into the Advertising, Outreach,  
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**Docket No. P999/CI-20-747**

CERTIFICATE OF SERVICE

I hereby certify that on the 9<sup>th</sup> day of November, 2020, I served the attached filing electronically on the attached service list via the Minnesota Public Utilities Commission's eFiling System.

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On behalf of the Minnesota Telecom Alliance

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