



October 29, 2020

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

Re: Response to Minnesota Public Utilities Commission Request for Initial Comments in
MN PUC Docket No. P999/CI-20-747

Dear Mr. Seuffert:

Enclosed via e-filing are the initial comments for Western Telephone Company, Study Area
Code 361502 as a High Cost ETC pursuant to the Commission's Order No. P999/CI-20-747.

Should you have any questions, please contact me via e-mail at roxih@interstatetelcom.com or by
phone at 320/848-6641.

Sincerely,

/s/Roxanne K. Hacker

Roxanne K. Hacker
Regulatory Consultant

Enclosures:

Cc: Curt Kawlewski

Western Telephone Company

Initial Comments as a High Cost ETC in Minnesota PUC Docket No. P999/CI-20-747

1. Current Number of Lifeline Customers as of 9/30/20:
 - a. Study Area Code 361502 Total Lifeline customers = 19
 - b. Non-tribal service areas Lifeline customers = 19
 - c. Tribal service areas Lifeline customers = 0

2. How Lifeline Services are Advertised:

Western Telephone Company advertises Lifeline Services on our website.

- Website: <https://nuvera.net/lifeline-tap-programs/>

In addition, Lifeline Services are advertised in customer notices.

3. Provide Samples of Lifeline Advertising:

- Exhibit 1 – Lifeline information from website.
- Exhibit 2 – Lifeline information from customer notice.

4. Does the High Cost ETC have any other observations about Lifeline:

No Comment



[\(https://nuvera.net/\)](https://nuvera.net/)

Having trouble paying your telephone bill?

If you are a low-income household or are enrolled in government programs, like SNAP or Medical Assistance, you qualify!

Contact us about the Telephone Assistance Plan discount.

Minnesota

The federal Lifeline program provides monthly service discounts on one landline telephone or Internet service per household. The state Telephone Assistance Plan (TAP) provides monthly telephone service discounts on one landline telephone per household. Please note that Lifeline recipients will be automatically enrolled in the TAP program as required by Minnesota law and applicable Commission Orders. Complete details about both programs are available online from the Minnesota Public Utilities Commission (<https://mn.gov/puc/telecommunications/telephone-discounts/>) or call Nuvera at 844-354-4111.

If you qualify for these programs, please complete the following form and return it to your local Nuvera office:

Lifeline Program Application Form

were released and are listed below. Please update your lifeline materials to reflect the 2020 limits. The mandated USAC forms will be updated and are available at www.usac.org.

Qualifications

To verify whether the customer qualifies under these criteria, they must supply one of the following documents proving their income level:

- Prior year's federal or state or Tribal income tax return
 - Current annual statement of income from employer
 - Paycheck Stubs – recent 3 consecutive in a row
 - Social security statement of benefits
 - Veteran's Administration statement of benefits
 - Retirement or pension statement of benefits
 - Unemployment or worker's compensation statement of benefits
 - Letter of participation in general assistance
 - Divorce decree or child support documentation
- 2020 FEDERAL POVERTY LEVELS (135% already calculated)

2	\$23,274
3	\$29,322
4	\$35,370
5	\$41,418
6	\$47,466
7	\$53,514
8	\$59,562
*For each Additional Person	Add \$6,048

Programs available in the following areas:

Voice

Goodhue

Hanska

Hutchinson

Litchfield

Sleepy Eye
Springfield

Internet

Goodhue
Hanska
Hutchinson
Mazeppa
New Ulm
Prior Lake
Sleepy Eye
Springfield

Iowa

The federal Lifeline program provides monthly service discounts on one landline telephone or Internet service per household. Call Nuvera at 844-354-4111 for more information. If you qualify for Lifeline, please complete the Iowa Lifeline Assistance Certification Form (<https://nuvera.net/wp-content/uploads/Iowa-Telephone-Discount-App.pdf>) and return it to your local Nuvera office.

Residential

[Current Promotions \(https://nuvera.net/current-promotions/\)](https://nuvera.net/current-promotions/)

[Digital TV \(https://nuvera.net/services/digital-tv/\)](https://nuvera.net/services/digital-tv/)

[High-Speed Internet \(https://nuvera.net/services/internet/\)](https://nuvera.net/services/internet/)

[Voice \(https://nuvera.net/services/voice/\)](https://nuvera.net/services/voice/)

[Nuvera Wireless \(https://nuverawireless.com\)](https://nuverawireless.com)

Residential Support

[Technical Support \(https://nuvera.net/support/\)](https://nuvera.net/support/)

[TechTrends \(http://www.techtrendsonline.com\)](http://www.techtrendsonline.com)

Business

[Digital TV \(https://nuverabusiness.com/services/digital-tv/\)](https://nuverabusiness.com/services/digital-tv/)

[High-Speed Internet \(https://nuverabusiness.com/services/business-internet/\)](https://nuverabusiness.com/services/business-internet/)

[Voice \(https://nuverabusiness.com/voice-solutions/\)](https://nuverabusiness.com/voice-solutions/)

[Managed Services \(https://nuverabusiness.com/hosted-services/\)](https://nuverabusiness.com/hosted-services/)

Business Support

[Technical Support \(https://nuverabusiness.com/support/\)](https://nuverabusiness.com/support/)

About Us

[Careers \(https://nuvera.net/about-us/careers/\)](https://nuvera.net/about-us/careers/)

[Community Involvement \(https://nuvera.net/about-us/community-involvement/\)](https://nuvera.net/about-us/community-involvement/)

[Mission and Values \(https://nuvera.net/about-us/mission-and-values/\)](https://nuvera.net/about-us/mission-and-values/)

[Press Releases \(https://nuvera.net/about-us/press-releases/\)](https://nuvera.net/about-us/press-releases/)

[Investors \(/about-us/investors/\)](/about-us/investors/)

[Public Relations \(https://nuvera.net/about-us/public-relations/\)](https://nuvera.net/about-us/public-relations/)

[History \(https://nuvera.net/history/\)](https://nuvera.net/history/)

[Terms & Policies \(https://nuvera.net/terms-and-policies/\)](https://nuvera.net/terms-and-policies/)

Account Support

[Residential Email \(https://mail.newulmtel.net/landing.php\)](https://mail.newulmtel.net/landing.php)

[Business Class Email \(https://webmail.nuhosted.com/owa/auth/logon.aspx?replaceCurrent=1&url=https%3a%2f%2fwebmail.nuhosted.com%2fowa%2f\)](https://webmail.nuhosted.com/owa/auth/logon.aspx?replaceCurrent=1&url=https%3a%2f%2fwebmail.nuhosted.com%2fowa%2f)

[eStatement \(https://ecrm.nutelecom.net/esp\)](https://ecrm.nutelecom.net/esp)

[Nuvera Wireless \(https://nuverawireless.com/MyAccount/tabid/2609/Default.aspx\)](https://nuverawireless.com/MyAccount/tabid/2609/Default.aspx)

[Local Solution \(https://www.localsolution.com/\)](https://www.localsolution.com/)

Other Nuvera Sites

[Nuvera TechTrends \(https://nuveratechtrends.com/\)](https://nuveratechtrends.com/)

[Nuvera Wireless \(https://nuverawireless.com/\)](https://nuverawireless.com/)

[IES 911 \(https://www.ies911.com/\)](https://www.ies911.com/)



[_ \(https://facebook.com/NuveraCommunications\)](https://facebook.com/NuveraCommunications)



[\(https://www.linkedin.com/company/28994579\)](https://www.linkedin.com/company/28994579)

[\(https://www.youtube.com/user/NUTelecom\)](https://www.youtube.com/user/NUTelecom)

NOTICE

As a Minnesota consumer, you may qualify for one of two programs that provide assistance with paying your telephone bill.

LIFELINE PROGRAM:

The Universal Service Fund low-income Lifeline Program benefit is available to recipients of:

- Medicaid (Medical Assistance)
- Veteran's Pension Benefits
- Income is below 135% of the Federal Poverty Level
- Tribal Lands
- SSI (Supplemental Security Income)
- SNAP (Supplemental Nutrition Assistance Program)

The USF Lifeline Program is not available to customers who are dependents for federal income tax purposes unless the customer is more than 60 years of age. With recent Federal Communications Commission (FCC) reforms, the Lifeline program has been streamlined, and eligible customers are now limited to one wireline or wireless phone or Broadband Internet Access Service (BIAS) per qualified household. The Lifeline Benefit provides a reduced monthly rate for telephone or BIAS service (subject to speed tier minimums).

MINNESOTA TELEPHONE ASSISTANCE PLAN (TAP)

This program offers an additional monthly discount on your phone bill. Eligibility requirements are the same as lifeline above.

Contact your local telephone company for information and program verification. If you have questions in regards to the above mentioned programs, please contact our office at 844.354.4111.