

November 4th, 2020

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

Re: Response to Minnesota Public Utilities Commission Request for Information in Docket
No. 20-747

Dear Mr. Seuffert:

Enclosed please find the Initial Comments for Albany Mutual Telephone Association as a
High Cost ETC in Docket No. P999/CI-20-747.

Please call me at 651-621-8306 with any questions.

Sincerely,

/s/ Mary T. Buley

Mary T. Buley
Telecommunications Consultant

Enclosure

cc: Lisa Groetsch, Albany Mutual Telephone Association
Steve Katka, Albany Mutual Telephone Association

Initial Comments for Albany Mutual Telephone Association as a High Cost ETC in
Minnesota PUC Docket No. 20-747

1. Current number of Lifeline Customers as of 9/30/20
 - a. Study Area Code: (361347) 41 lifeline customers
2. How are Lifeline Services Advertised:

Albany Mutual Telephone Association (“Albany”) advertises Lifeline on its website at:

<https://www.albanytel.com/products/telephone/telephone-assistance-program/>

In addition, Albany advertises lifeline annually on a bill message and in an annual regulatory notice sent to each customer. Albany provides lifeline information to a local Senior Housing development in its service territory. Customer service representatives educate customers who stop by the office if they have questions on applying or recertification for lifeline.

3. Provide Samples of Lifeline Advertising: Attached is Exhibit 1 which is a scan of Albany’s web site advertising Lifeline in MN. Exhibit 2 is the bill message on Lifeline that is sent out annually. Exhibit 3 is the annual notice sent to all customers covering various topics including Lifeline and TAP programs.
4. Provide any additional Comments or observations on lifeline that is relevant to the Commission’s Inquiry.
No comments.



Telephone

[Start Shopping](#)

[Features](#)

[Long Distance](#)

[Telephone Assistance](#)

Telephone Assistance Plan

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.



Now you can check to see if you are in our service area.

[Check Availability](#)



Telephone Discounts Can Help You Stay In Touch

Minnesota's Telephone Assistance Plan (TAP) and the federal LIFELINE Program help make telephone service affordable to low-income consumers.

TAP offers a \$7.00 per month discount on home landline telephone service.

The Lifeline Program offers a \$9.25 per month discount on home landline or internet service OR on cell phone service.

Lifeline recipients will be automatically enrolled in the TAP program.

Lifeline credits may be used to reduce the price of broadband internet service in addition to reducing the price of landline service.

How do I find out if I am eligible?

How do I apply?

Your phone service provider can assist you with the application(s) or contact the Minnesota Public Utilities Commission for assistance, consumer.puc@state.mn.us or 651-296-0406 or 1-800-657-3782.

If you receive your benefits from a wireless carrier follow this link for a TAP only application https://mn.gov/puc/assets/2020%20TAP%20App_tcm14-425212.pdf

To view a Lifeline application and the Household Worksheet visit <https://www.usac.org/lifeline/additional-requirements/forms/>



Remittance Information

Account Number
 Invoice Number
 Bill Date
 Due Date
Amount Due Jan 01, 2020
Jan 25, 2020
\$ 0.00

Amount Enclosed: \$ _____
 Please include account number on your check and make payable to Albany Mutual Telephone

ALBANY MUTUAL TELEPHONE FREEPORT CO
 131 6TH ST
 ALBANY, MN 56307-8322


 ALBANY MUTUAL TELEPHONE
 131 6TH ST
 ALBANY, MN 56307



- Check here for change of address (See reverse for details)
- Check here to enroll in automatic payments (See reverse for details)

To ensure proper credit, please return the top portion of this page with your payment. Keep the lower portion for your records.



Balance Forward

Previous Bill \$ 0.00
 Total payments through Dec 27 \$ 0.00

Balance Before Current Charges \$ 0.00

Subtotal Current Charges \$ 0.00

Total Amount Due \$ 0.00

You may qualify for discounted telephone service if your income level falls below 135% of the Federal Poverty Guidelines or if you are currently receiving benefits under one or more of the following programs: Medicaid, Federal Public Housing Assistance, SSI, SNAP, TTANF, FDPIR, Bureau of Indian Affairs General Assistance, Tribally Administrated Head Start or Veterans Pension and Survivors Benefit Program. For more information about the MN Telephone Assistance Plan and Federal Lifeline call Albany Mutual Telephone at 320-845-2101.

Billing Inquiries Call: (320) 845-2101

Account Summary

Account Number
 Invoice Number
 Bill Date
Due Date Jan 01, 2020
Jan 25, 2020

Previous Bill \$ 0.00
 Previous Payments \$ 0.00
 Previous Balance \$ 0.00
 Current Charges \$ 0.00
 Advance Payments \$ 0.00

Amount Due \$ 0.00

Message Center

YOUR NEW DEVICES
 DESERVE OUR
 MANAGED WI-FI



320.845.2101

Albany Mutual Telephone
 For Knowledge. All the Way Home.

Credit Card Payment

Please Select:

Monthly Recurring

Payment will process on the 15th of each month for amount due.

One-Time Payment

Payment will process upon receipt for amount authorized.

Card Number: _____ CVV #: _____ Expiration Date: _____ Amount Authorized: \$ _____
Last 3 digits on back of card

Billing Address: _____ Type of Card: Visa Mastercard Discover

City: _____ State: _____ Zip: _____ Signature: _____

Recurring Automatic Payment from Checking Account

I would like my account to be paid automatically on the 15th of each month from my checking account for the amount due.

Please sign below and attach a voided check to begin this payment option with your next bill.

Signature: _____ Date: _____

Has your billing or contact information changed? Update your records by providing this new information.

New Mailing Address: _____ Effective Date: _____

City: _____ State: _____ Zip: _____ Daytime Contact #: _____

Signature: _____



Telephone Subscriber Annual Notice

Albany Mutual Telephone Provides telecommunication services within the exchanges of 836, 837, and 845 in Central Minnesota.

Customer Rights

At Albany Mutual Telephone we work hard to provide quality products and services. Albany Mutual Telephone is governed by the laws and regulations in the State of Minnesota for providing telephone service. However, if you are ever unhappy with your service please contact us immediately to resolve the situation. Consumers have the right to contact the Minnesota Public Utilities Commission if you feel your complaint has not been resolved. **Minnesota Public Utilities Commission**, 121 7th Place East, Suite 350, Saint Paul, MN 55101-2147, 800-657-3782 or <https://mn.gov/puc/>.

Services

Albany Mutual Telephone offers a full range of services that help make your telecommunications easier. Add value-priced options to your basic service to meet all of your calling needs. Call our office today to get connected to any or all of these services.

Extended Area Service (EAS) refers to all local calls. Local calls are calls that you can make, by dialing a 7-digit number to predetermined areas near your home. EAS calls for customers of Albany Mutual Telephone include the following communities:

Albany EAS: Freeport, New Munich, Holdingford, Avon, Upsala

Freeport EAS: Albany New Munich, Upsala

New Munich EAS: Albany, Freeport

Additional Service Options

Telephone Directory & Listing

As a customer of Albany Mutual Telephone you will continue to receive a free issue of the directory for your area. Your listing will also be included in the directory free of charge. Non published and non-listed numbers are available for an additional monthly charge.

Information and Operator Assistance

Directory and operator assisted services are available to you. Please refer to your local telephone directory for a description of these services. Albany Mutual Telephone provides free directory assistance to the blind.

900/976 Blocking

Prevent unwanted long distance charges by restricting calls that have 900 or 976 prefixes – Free.

Protecting Your Privacy

Albany Mutual Telephone protects the confidentiality of its telecommunications customers consistent with applicable law, including the FCC's regulations governing Customer Proprietary Network Information (CPNI).

What is CPNI? CPNI is information Albany Mutual Telephone obtains or creates in the normal course of providing local or long distance telecommunication service to you. This information includes the quantity and types of telecommunication services you currently receive, how you use them and related billing information, such as call destination, location and amount of use. CPNI is made available to Albany Mutual Telephone solely by virtue of our carrier-customer relationship. CPNI does not include your telephone number, name and address since this information is typically published in a telephone directory.

Disclosure of CPNI

Protecting the confidentiality of your CPNI is your right and our duty under federal law. We do not sell or disclose CPNI to anyone outside of Albany Mutual Telephone or to anyone not authorized to represent us to offer products or services, or to perform functions on our behalf, except as may be required or permitted by law or authorized by you. When Albany Mutual Telephone uses agents, contractors or other companies to perform services on our behalf, we require them to protect your CPNI consistent with applicable law. Albany Mutual Telephone does not disclose CPNI to any unaffiliated third parties for use in their marketing.

Additional Security Procedures

As part of the Federal Communications Commission's privacy requirements and the Federal Trade Commission's Identity Theft regulations enhanced security measures are in place. All person(s) authorized as the account holder will need to be validated prior to any modifications or information concerning the account can be processed or released. This will include "Call detail information" such as called number, calling number, time, location or duration of any call. Albany Mutual Telephone will ask for either photo ID or password. Albany Mutual Telephone will only be able to mail the "address of record" or to call the customer at the "telephone of record" to process any changes or requests for information.

Notice of Your Rights to Restrict CPNI

You have the right under federal law to restrict our use or disclosure of an access to your CPNI. You also have the right to grant or deny access to your CPNI by notifying us. At no time will your decision to deny approval affect the provision of any telecommunications services from Albany Mutual Telephone. However, without your approval, our ability to provide you with information on other services will be prohibited.

Toll Blocking

Prevent unwanted local toll or long distance charges by restricting calls with toll charges. A free service!

Choosing a Long Distance Carrier

You may choose almost any long distance carrier you wish. However, there are certain benefits to choosing Albany Mutual Telephone Long Distance Service. Most importantly, with Albany Mutual Telephone Long Distance, your long distance charges will appear on your Albany Mutual Telephone bill. If you select any other carrier, you will be billed separately. If you choose a long distance carrier other than Albany Mutual Telephone, you must contact that company directly. Once you've signed up for your service, please contact Albany Mutual Telephone to notify us of your selection.

Casual Billing

No matter which long distance carrier you choose, it is very important that you select a calling plan, if you do not sign up for a particular plan, you will be billed as a "casual user" and charged as much as three times the normal plan rates.

Toll Restrictions

For those concerned with the potential abuse of their telephone, several long distance blocking restrictions for 900 numbers and International calls are available. Please ask us for details.

Billing Information

Albany Mutual Telephone issues bills the 1st of each month. To protect your credit, please pay by the 25th of the month. Please note, monthly charges are billed one month in advance.

- Always check your phone bill before paying it, and call us if you have any questions.
- To ensure proper credit, please enclose the top portion of your bill along with your payment.
- Call us if you need to make special payment arrangements.

Ways to make your payment:

- In person at our business office
- By mail with the return envelope enclosed in your bill
- After hours, using the deposit box located at our office
- By Automatic Payment Plan
- By Electronic Bill Payment online at www.albanytel.com

Termination or Denial of Service

Albany Mutual Telephone may, immediately and without notice to the customer temporarily deny, terminate or suspend service to any customer in the event such customer or its agent: Willfully damages, tampers or interferes with company

equipment; or creates a condition that is determined to be hazardous to (a) the customer; (b) other customers of Albany Mutual Telephone; (c) Albany Mutual Telephone's equipment; (d) the public; (e) an employee of Albany Mutual Telephone; or Uses the equipment in such a manner as to adversely affect Albany Mutual Telephone's equipment or the service to other customer's. Albany Mutual Telephone may, with five (5) days' send a notice to the customer, which may temporarily deny, terminate or suspend service to any customer in the event such customer or its agent: Fails to pay a bill for service when due; or Fails to meet the Company's credit requirements; or Fails to make proper provision of law, or any rule of regulation of the Minnesota Public Utilities Commission, the federal Communications Commission, or any of the company's rules on file with the MN Public Utilities Commission.

Returned Check Fee

A returned check charge is a non-recurring charge that is applicable when a check is presented in payment for services and is subsequently returned by the bank unpaid. A service charge of \$30 will be imposed on any dishonored check.

National Do Not Call Registry

To stop unwanted telemarketing calls, the FTC will register consumers on a National Do Not Call list. To sign up, you can go to www.donotcall.gov or call toll free 1-888-382-1222. You must call from the number you wish to register. If you have complaints about calls you received after signing on to the list, go to www.donotcall.gov and submit a complaint. Do Not Call Registry will be effective 31 days following your registration and will remain on until you remove it.

Incorrect Directory Assistance Information

If you receive an incorrect Directory Assistance (DA), you are entitled to credit for the DA charge. You must use the same dialing pattern to request credit that you used to make the call. You may request up to three credits. You will need to inform the provider what listing was incorrect, so that the correction can be made. A credit equal to the incorrect charge will appear on your bill.

Telephone Service Discounts

The Federal Lifeline and state Telephone Assistance Plan (TAP) programs provide a monthly discount on one telephone line or wireless telephone per household.

Who is eligible?

Telephone service must be in your name and you must show proof you participate in one or more of the qualifying programs: Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), Medicaid, Federal Public Housing Assistance (FPHA), Veterans Pension or Survivors Benefit programs. If you do not participate in any of the above programs, you may still qualify if you prove your income is at or below 135% of the federal poverty income guidelines. For more information or if you have questions about these discount programs or the application process, contact Albany Mutual Telephone at 320-845-2101 or you can contact the MN Public Utilities Commission for more information or <https://mn.gov/puc/>.

Are you having trouble using the telephone due to a hearing or speech disability?

Minnesota Relay is a free telephone service that uses specially trained communications assistants (CAs) to facilitate telephone calls between people with hearing and speech disabilities and other individuals. Calls can be made to anywhere in the world, 24 hours a day, 365 days a year. All calls are completely confidential. To make a Relay call dial 7-1-1. Once connected to the relay service, tell the CA the type of relay call you wish to make. Or, you may dial the specific toll free number for the type of relay service.

For More Information on Minnesota Relay Services: www.mnrelay.org or 1-800-657-3775.

Types of Relay Services

Captioned Telephone Service (CTS)

CTS uses a special telephone with a text display screen so that a person who is hard of hearing *can listen to and read captions* of everything the other person on the call says. You speak directly to the other person on the call, and a relay CA transcribes everything the other person says into captions, which appear on the display screen of your CTS phone.

Internet Protocol Captioned Telephone Service (IP CTS)

Internet-based forms of CTS are available for those who would like to use CTS on a computer, tablet, or smartphone. Go to: www.fcc.gov/consumers/guides/internet-protocol-ip-captioned-telephone-service.

Computer (ASCII): 1-800-627-3529

Computer users can access Minnesota Relay. Set your communications software to the following protocols: speeds ranging from 300 to 2400; 8 Bits; No Parity; 1 Stop Bit; Full Duplex. When calling at a rate of 300 or below, follow the above using Half Duplex.

Hearing Carry Over (HCO): 1-800-627-3529

HCO allows a person who can hear clearly but who has very limited or no speech capability to make phone calls. Using a special text telephone, you type your conversation for the relay CA to read to the other person, and listen directly to the other person's response.

Hearing User: 1-800-627-3529

A hearing person may use a standard telephone or mobile phone to place a relay call and speak with a person who is deaf, hard of hearing, or speech disabled.

Internet Protocol (IP) Relay:

IP Relay combines text-based relay service with the ease of the Internet – no need for a TTY. You are able to make your relay call using a computer, laptop, tablet, or smartphone. Go to: www.sprintrelay.com.

Spanish Relay: 1-877-627-5448

Spanish speaking persons with a hearing or speech disability are able to make relay calls. This is not a translation service – both parties must speak Spanish, and at least one party must have a hearing or speech disability.

Speech-to-Speech (STS): 1-877-627-3848

STS allows a person who has difficulty speaking or being understood on the phone to communicate using his or her own voice or voice synthesizer. The CA revoices your words so that the other person on the call can understand them, and the other person speaks directly to you.

Text-Telephone (TTY): 1-800-627-3529

This service allows a person who is deaf, deafblind, or speech disabled to use a TTY to communicate with the other person on the call.

Video Relay Service (VRS)

VRS allows a person who uses American Sign Language (ASL) to communicate over the phone. The VRS user connects to the relay CA via an Internet-enabled device with a video camera. The CA relays the conversation back and forth between the parties – in ASL with the VRS user and by voice with the called party. Go to: www.fcc.gov/consumers/guides/video-relay-services.

Voice Carry Over (VCO): 1-877-627-3024

VCO allows a person with a hearing disability, but who wants to use his or her own voice, to speak directly to the other party. The CA then types the other party's response, which is displayed on the VCO user's text telephone.

Important Information

Emergency Assistance

TTY callers should dial 9-1-1 directly in an emergency. All 9-1-1 centers are equipped to handle TTY calls. Minnesota Relay can process emergency calls, but this may delay response to your call.

To File a Complaint Regarding Minnesota Relay

Email your complaint to mn.relay@state.mn.us or call 1-800-657-3775.

You will need to provide the date and time of the relay call, the calling from and to phone numbers, the CA's identification number, and the nature of your complaint.

You may also file a complaint with the Federal Communications Commission:

Website: www.fcc.gov/complaints

TTY: 1-888-835-5322

Voice: 1-888-225-5322

ASL via VP: 1-844-432-2275

Telephone Equipment Distribution (TED) Program

The TED Program provides free specialized telecommunications equipment to income eligible Minnesotans who are having trouble using the telephone due to a hearing, speech, or physical disability. For more information on the TED Program:

Website: mn.gov/dhs/ted-program

Voice: 1-800-657-3663

ASL via VP: 1-866-635-0082