



November 5, 2020

Mr. Will 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 Initial Comments in MN PUC
Docket No. P999/CI-20-747

Dear Mr. Seuffert:

Enclosed via e-filing are the initial comments for Midcontinent Communications, Study Area Code 369015 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 Andrea.Livingston@Midco.com or Pat Mastel via e-mail at Pat.Mastel@Midco.com.

Respectfully,

A handwritten signature in black ink that reads "Andrea Livingston".

Andrea Livingston
Regulatory Reporting Manager
Andrea.Livingston@Midco.com
605.274.3648

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

**IN THE MATTER OF INQUIRY INTO
THE ADVERTISING, OUTREACH, AND
OFFERING OF LIFELINE BY HIGH COST
ETCS**

DOCKET NO. P999/CI-20-747

COMMENTS OF MIDCONTINENT COMMUNICATIONS

On October 7, 2020, the Commission issued a *Notice of Comment Period* in this Docket inviting comment on several topics related to the best practices in advertising, outreach, and offering of Lifeline by High Cost Eligible Telecommunications Carriers (“High Cost ETCs”).

The Commission specifically sought information regarding:

- How many Lifeline customers each ETC receiving high cost support is currently serving and identify any patterns or trends it has seen in Lifeline enrollment for its service area.
- How are High Cost ETCs advertising Lifeline services, with special explanation given to advertising and outreach to diverse populations.
- A sample of Lifeline advertising materials and an explanation of the types of outreach and advertising ETCs use to most effectively reach eligible populations.
- Other observations or experience about Lifeline that is relevant to the Commission’s inquiry into advertising and outreach?

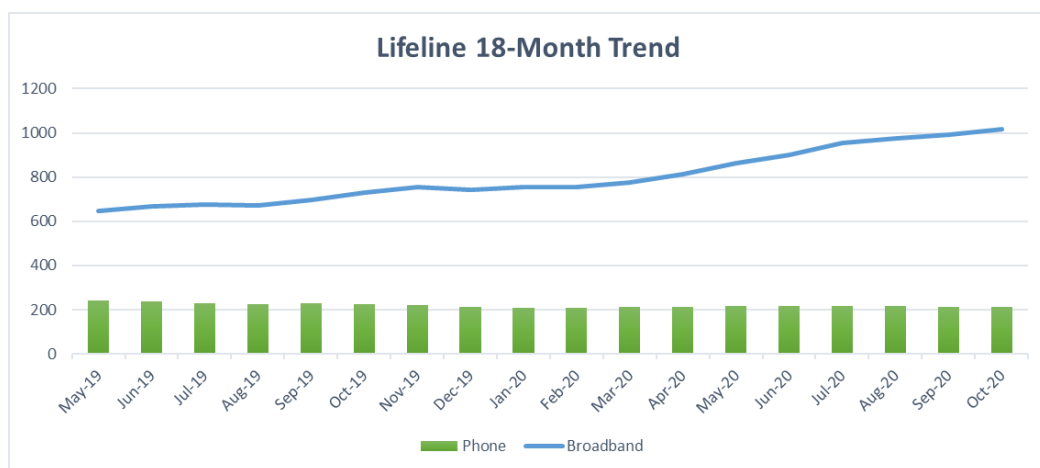
Midcontinent Communications (“Midco”) offers the following comments.

Number of Lifeline customers and trends

The federal Lifeline program, administered through the Universal Service Administrative Company (“USAC”), provides a discount on voice or broadband services for low-income consumers. As well, the Minnesota Telephone Assistance Plan (“TAP”) credit is available to

consumers with voice services. Currently, Midco has 212 Lifeline voice customers and 1,015 Lifeline broadband customers receiving a combination of federal Lifeline benefits and TAP credits.

Midco has seen Lifeline benefits shift to broadband services away from phone, with phone remaining relatively steady. Trending over an eighteen month period, Lifeline broadband averaged a 3% increase, whereas Lifeline phone averaged a 1% decrease, as reflected in the following graph.



Lifeline advertising methods and samples

Midco provides Lifeline information on its website, as well annually via Midco's Annual Notice. Midco also notifies customers of Lifeline and MN TAP twice a year through customer statement messaging. New Midco customers receive notification of Lifeline availability on their first statements and via our services brochure. Voice customers also receive Lifeline Assistance information in the Midco Home Phone Quick Start Guide, which is linked to in new customer emails and available on our website.

Midco also airs cross-channel Lifeline Assistance commercials throughout Midco's cable system. These have aired approximately 20,174 times already in 2020. Examples of each advertising method is included in Attachment A.

Attachment A

WEBSITE

Residential Business Midco Sports Network | TV Everywhere

MIDCO SERVICES SUPPORT SHOP MY ACCOUNT CONTACT

PAY BILL LOGIN EMAIL

Search


Stay Connected with Lifeline

Whether it's keeping in touch with family, searching and applying for a job, doing school work or paying bills – staying connected is important.

Lifeline is a federal program intended to put home phone and internet service within the reach of qualifying families – giving low-income households affordable home phone or internet access.

This isn't a promotion or special offer. If you reside in a state where Midco is an eligible telecommunications carrier (ETC) and Midco services are available at your home address, you may be eligible for this program if you meet the program qualifications.


Broadband Assistance



Enjoy cost-effective connectivity, with no installation fee and rent-free modems.¹

- Up to 25 Mbps downloads & 3 Mbps uploads

Home Phone Assistance



Get reliable, digital home phone service at a reduced monthly rate.² There's no installation fee, and it includes free long-distance blocking upon request.

Eligibility

Lifeline Assistance is available to qualifying new and current customers who meet income guidelines. Some of the other eligibility requirements include:

- Only one Lifeline credit is allowed per household.
- Only one Lifeline credit is allowed per individual.
- Midco service must be in the eligible participant's name or they must certify that the program participant is a member of the household.
- You may be required to recertify household eligibility at any time. Failure to recertify may result in termination of the Lifeline benefit.
- Lifeline assistance cannot be transferred to another person.

How to Apply

- Visit CheckLifeline.org to apply and check your eligibility for this federal program. If you need help, call the Lifeline Support Center at 1.877.524.1325.
- Download the [PDF Lifeline application](#) and mail it with your proof of eligibility document(s) to USAC, Lifeline Support Center, PO Box 7081, London, KY 40742.
- Contact us at 1.800.888.1300. We'll mail you a form to fill out and send to USAC with your proof of eligibility document(s).

[APPLY ONLINE](#)

[DOWNLOAD APPLICATION](#)

Note: As of March 24, 2020, customers who reside in the state of Minnesota wishing to apply for the Lifeline benefit will be required to check their Lifeline eligibility through the FCC and USAC's (Universal Service Administrative Company) National Verifier system.

Minnesota Customers

Having trouble paying for phone or internet service? Minnesota's Telephone Assistance Plan (TAP) and the federal Lifeline program help make these services affordable to low-income consumers.

TAP offers a \$7 per month discount on home landline telephone service online. The Lifeline program offers a \$7.25 per month discount on home landline service or \$9.25 per month discount on internet service. Program eligibility is based on income. Consumers enrolled in certain federal programs may already be eligible.

[LEARN MORE](#)

FAQ

What qualifications must I meet to be eligible? ▾

I am currently a Midco customer. Can I switch to a Lifeline plan? ▾

I am not currently a Midco customer. Do I need to have active Midco service before I can apply for Lifeline? ▾

Do I qualify for MN TAP program? ▾

What steps do I take to renew my contract? ▾

What other things should I be aware of before I begin my application? ▾

Questions or Complaints

For unresolved questions or complaints, you may contact the state utilities commission in your state:

Kansas

Kansas Corporation Commission,
Office of Public Affairs and Consumer Protection
1500 SW Arrowhead Road, Topeka, KS 66604
Toll-Free: 1.800.662.0027, or in Topeka: 785.271.3140
Hearing or speech impaired TCC Kansas Relay Center:
1.800.766.3777

Minnesota

Minnesota Public Utilities Commission, Consumer Affairs
Office
121 7th Place E, Ste 350, Saint Paul, MN 55101
Toll-Free: 1.800.657.3782 or 651.296.0406
MN.gov

North Dakota

North Dakota Public Service Commission
600 E Boulevard, Bismarck, ND 58505
Toll-Free: 1.877.245.6685 or in Bismarck: 701.328.2400

South Dakota

South Dakota Public Utilities Commission, Consumer Affairs
Capitol Building, 500 E Capitol Ave, Pierre, SD 57501
Phone: 605.773.3201

Services may not be available in all areas, and some restrictions may apply.

¹ Actual speeds may vary depending on your computer or mobile device's capacity, the number of devices accessing the internet at one time and web traffic. Speeds may also be impacted by third-party equipment (such as your computer or router). If you enroll in Lifeline internet, download speeds are up to 28 Mbps. These speeds are not compatible with our TVoIP service, which requires a minimum of 50 Mbps downloads.

² When qualifying under the Federal Telephone Lifeline Program, if you live in Minnesota or Kansas, you will also qualify for additional state assistance under the Minnesota Telephone Assistance Program (TAP) or the Kansas State Lifeline program.

Taxes and other federal fees will increase the cost on phone services. FCC regulations state that broadband Lifeline recipients must remain with the same internet service provider (in this case, Midco) for at least 12 months after first qualifying for the Lifeline discount. After that, you are free to switch your internet and qualify for a Lifeline benefit with a different company. The FCC allows an exception if you move to a different state or area where your provider (Midco) doesn't offer service. If that's the case, please contact us so we can help you transfer your broadband Lifeline benefit to your new internet provider.



LIFELINE STATEMENT MESSAGING

The Lifeline Assistance program provides discounted home phone and internet services to low-income households. Find program details and the application at Midco.com/Lifeline or contact us at 1.800.888.1300.

MINNESOTA TELEPHONE ASSISTANCE PLAN (TAP) STATEMENT MESSAGING

MN's Telephone Assistance Plan (TAP) and the federal Lifeline program help make telephone service affordable to low-income customers. Contact Midco or the Minnesota Public Utilities Commission for assistance and to see if you qualify. Learn more at Midco.com/Lifeline

NEW CUSTOMER STATEMENT MESSAGING



Contact Us: Midco.com or 1.800.888.1300

NEW CUSTOMER
123 SUNSHINE WAY
ANYTOWN, USA 51000



Total Amount Due \$00.00
Pay By 07/04/18
Account Number 0123456789

News from Midco!

Welcome to Midco!

We know that you'll enjoy our reliable phone service. By subscribing to the service, you agree to the terms and conditions described in the enclosed agreement and at Midco.com/Legal.

Assistance: Low-income telephone subscribers may qualify for Lifeline Assistance Programs. Visit Midco.com/Lifeline or call 1.800.888.1300 for details.

Alert: Caller identification is susceptible to fraud known as Caller ID Spoofing. Fraudulent parties can deliberately falsify a number relayed to your caller ID to try to disguise their identity and where the call was originated. For more information visit www.fcc.gov/guides/caller-id-and-spoofing.

Your privacy is important at Midco. When requesting call record information, we follow strict verification procedures before releasing information.

Questions? Call 1.800.888.1300.

New Charges Summary	
Phone Services	00.00
Additional Phone Services	0.00
Taxes, Surcharges & Fees	00.00
Total New Charges	\$00.00

Current Billing Summary	
Previous Balance	0.00
Current Amount Before Savings	0.00
Total Monthly Savings	00.00
Total Amount Due	\$00.00

You Saved \$0.00 This Month

Phone Package Discount	-0.00
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Detach and endorse the portion below with your payment. Please write your account number on your check. Do not send cash.



PO Box 5010, Sioux Falls, SD 57117-5010
9607 3 AB 0.408 011100//31786

NEW CUSTOMER
123 SUNSHINE WAY
ANYTOWN, SD 51000

Pay Online: Visit Midco.com. Register for or sign in to My Account.
Pay by EFT: Currently enrolled in Automatic Payment
Pay by Phone: Call 1.800.888.1300 to make an automated payment.
Pay by Mail: Return this stub with payment. Do not send cash.

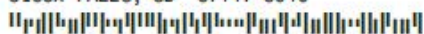
Total Amount Due Do Not Remit
Pay By 07/04/18
Account Number 0123456789

Statement Code 001

Name/Address Corrections Noted

Make checks payable to:

MIDCONTINENT COMMUNICATIONS
P.O. BOX 5010
SIOUX FALLS, SD 57117-5010



2 5 32 10042804903 00003491 10042804903 00003491 6

Assistance Options

Hearing & Speech Assistance

We provide hearing and speech support assistance to disabled customers throughout our region. With Telecommunications Relay Service (TRS), commonly known as relay calling, operators help facilitate communication between the calling and receiving parties. Simply dial **711** from your Midco home phone. For state-specific relay service numbers and other relay information, visit [Midco.com/Support](https://www.midco.com/Support). Under Phone, click **Assistance Programs**, and then locate the relay services information.

Midco Lifeline

Low and fixed-income phone subscribers can apply for this government-assistance program, which helps them to help with their phone bill. Get more information and an application at [Midco.com/Lifeline](https://www.midco.com/Lifeline).

Directory Listing Exemption

Midco provides free directory-assistance calls to individuals with impaired vision or a qualifying disability that prevents the use of a phone book or other means of locating a phone number. Midco phone customers are eligible to receive this exemption, which does not include long-distance charges.

To apply for this exemption:

1. Visit [Midco.com/Support](https://www.midco.com/Support). Under Phone, click **Assistance Programs**, and then locate the directory listing exemption information.
2. Complete the application fields, and click **Submit**.
3. Once you have received approval from Midco, simply dial **0** to connect with the operator.

Need additional assistance? Contact us at [Midco.com/Contact](https://www.midco.com/Contact) or 1.800.888.1300 to find out if your need can be accommodated.

Commercial Audio Transcript

At Midco, we believe being connected is important. You use your internet and phone to pay bills, complete homework and stay in touch with family and friends. But we know for some people, a home phone or internet connection is just not affordable. We're here to change that with the Lifeline assistance program. Qualifying households can get home phone service at a reduced monthly rate and broadband internet for less than \$10 a month. To find out if you qualify for Lifeline assistance, call 1.800.888.1300 or visit Midco.com/Lifeline.