



November 9, 2020

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

Re: TDS Telecom's Response to the Minnesota Public utilities Commission Request for Initial
Comments in Docket No. P999/CI-20-747

Dear Mr. Seuffert:

Enclosed please find the Initial Comments for TDS Telecommunication Corporation's Minnesota High
Cost ETCs in Docket No. P999/CI-20-747: Arvig Telephone Company, Bridge Water Telephone Company,
Mid-State Telephone Company, and Winsted Telephone Company

I can be reached on 608-664-4152 if you have any questions.

Sincerely,

/s/ Jean M. Pauk

Jean M. Pauk
State Government Affairs Manager

Attachments

TDS Telecom Responses – Docket P999/CI-20-747

1. Current number of Lifeline Customers as of 9/30/20:

- a. Arvig Tel. Co. = 84
- b. Bridge Water Tel. Co. = 18
- c. Mid-State Tel. Co. = 41
- d. Winsted Tel. Co. = 6

In comparing the current Lifeline subscribership to data from a year ago, the number of Lifeline customers is relatively unchanged. Additionally, with the National Verifier hard launch in March and the FCC waivers in response to the Covid-19 pandemic, it is difficult to identify any trends or patterns.

2. How are Lifeline Services Advertised:

TDS Telecommunications advertises Lifeline on its website at: <https://tdstelecom.com/lifeline.html>
We have also provided education articles regarding Lifeline services in our Blog for Residential customers at <https://blog.tdstelecom.com/?s=Lifeline&submit.x=0&submit.y=0>. In addition, TDS Telecommunications advertises in various newspapers, provides information customer bills as an insert, and includes information on Lifeline in its local phone directories provided to customers.

3. Provide Samples of Lifeline Advertising

See **Exhibit 1** for Lifeline ad placed in local phone directories

See **Exhibit 2** for newspaper advertisement, which was placed in the following newspapers:

MN	Monticello	Monticello Times & Shopper
MN	New London	Lakes Area Review
MN	New London - Danube	Renville Co. Register
MN	Pequot Lakes	Lake County Echo
MN	Winsted	Winsted Lester Herald Journal

See **Exhibit 3** for a copy of the customer bill insert

4. Any observations or experiences about Lifeline relevant to the Commission’s inquiry into advertising and outreach?

How to best reach those that may qualify for Lifeline has challenges as well as limitations for carriers. How society receives information has evolved. For example, newspaper ads are utilized given the potential of reaching a larger population; however, some may no longer read a newspaper. The same is true for electronic means of outreach – some may not use the Internet to learn about Lifeline.

The Commission partnering and providing social service agencies Lifeline information would allow the agencies directly inform those seeking low-income assistance which may increase Lifeline subscribership rates.

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TDS Phone Numbers & Information

HOME

Sales/Customer Service	1-877-837-8372
Repair	1-888-837-9394
TDS TV	1-866-448-3788

BUSINESS

Sales/Customer Service	1-888-837-3050
Customer Service Fax	1-888-837-0022
Repair	1-888-837-9394

TDD/TTY	711
Buried Cable	811
Free cable location service— Call before you dig.	

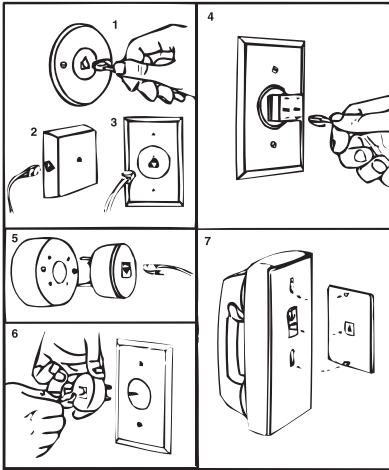
About TDS®

TDS Telecommunications LLC (TDS Telecom/TDS®) delivers high-speed Internet, TV entertainment, and phone services to nearly 900 rural, suburban, and metropolitan communities across the U.S. With more than 1.2 million connections, TDS is one of the fastest growing technology companies in the United States. Powered by fiber-optics and new industry-leading technologies, TDS delivers up to 1 Gigabit Internet speeds and offers Internet-protocol based TV entertainment solutions along with traditional phone services. TDS also offers businesses VoIP advanced communications solutions, dedicated Internet service, data networking, and hosted-managed services. Visit tdstelecom.com.

TDS Telecom, headquartered in Madison, Wis., employs nearly 2,700 people and is a subsidiary of Phone and Data Systems, Inc. [NYSE: TDS], a Fortune 1000® company. Founded in 1969, TDS Inc. employs 9,400 people and has approximately

To Connect/Disconnect Phones

The following illustrations should be helpful to you when installing or disconnecting your phones.



Desk Phones

Illustrations 1 through 4 show wall receptacles (standard jacks) which can accommodate modular phone cords. To install your phone, match the plug at the other end of the phone cord with the jack and insert. To disconnect the phone, squeeze the clip on the plug and pull out of the jack.

Adapters for Non-Standard Jacks

Illustrations 5 and 6 show receptacles (non-standard jacks), which can accommodate modular phone cords with the use of adapters. The adapters simply plug into the non-standard jack. With the adapter in place, follow the steps shown to install your phone.

Wall Phones

A receptacle for a wall-mounted phone is shown in illustration 7. To connect your wall phone, match the holes in the back of the phone with the rivets on the wall mounting, push the phone lightly against the mounting while sliding it down into place over the rivets. To disconnect, slide the phone up to lift it off the rivets, then pull the phone away from the receptacle. Types of modular jacks other than those shown in illustrations may be encountered.

More Helpful Information

Lifeline Provides Discounts on Phone Service

Lifeline Assistance credits reduce monthly local phone service charges for one phone connection per household.

Lifeline is a government assistance program. It is non-transferable. Only eligible consumers may enroll in the program. There is a limit of one discount per household. For more information, to check on eligibility, or to request an application visit www.tdstelecom.com/about/lifeline or call TDS at 1-888-CALL-TDS.

Phone Sales Calls (Telemarketing)

Many national companies use phone sales calls to reach more customers. These phone calls offer information about products and services you may want or need. If you do not want these calls, there are four things you can do.

1. Write to the following address to get your name off the list of all names called by telemarketers:

**Phone Preference Service
Direct Marketing Association
PO Box 1559
Carmel, NY 15012-1559**

2. Upon receiving a call from a particular telemarketer, ask them to identify themselves clearly and then tell them you want your number taken off the list.
3. Subscribe to calling features such as Anonymous Call Rejection, Call Rejection, Caller ID, Do Not Disturb, or Special Call Acceptance to help manage which calls are able to get through to your line. This can also help you identify where the calls are coming from so you can make the decision on how you want to handle them.
4. Remember that it is not impolite to hang up on such an unwanted caller. After informing the caller you do not wish to be called back, simply say goodbye.

National Do-Not-Call List

Consumers can register in two ways for the National Do-Not-Call List.

1. To use the Internet to add your number to the national registry or for additional information, visit www.donotcall.gov or www.fcc.gov/cgb/donotcall.
2. To register by phone, consumers may call 1-888-382-1222; for TTY call 1-866-290-4236. You must call from the phone number you wish to register.

Get a Discount on TDS Phone Service

If you think you can't afford service, think again. You could qualify for a discount on your service through a low-income telephone assistance program called Lifeline Assistance, or the Minnesota Telephone Assistance Program (TAP). Lifeline Assistance credits reduce monthly service charges.

Who's Eligible?

If you have a household income that is at or below 135% of the Federal Poverty Guidelines or if you participate in one of the following programs, call us today to discuss your options:

- Medicaid/Medical Assistance
- Food Support (Supplemental Nutrition Assistance Program (SNAP))
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA)
- Veteran's Pension and Survivor's Pension Benefits

Lifeline is a government assistance program. It is non-transferable. Only eligible consumers may enroll in the program. There is a limit of one discount per household. For more information, to check eligibility, or to request an application, visit <https://tdstelecom.com/lifeline.html> or **1-888-CALL-TDS**.



Lifeline Program

TDS Telecom offers a program to help our low-income residential customers keep their telephone service. This Federal program is called *Lifeline Assistance*. If you are a low-income residential customer you may qualify. Lifeline provides eligible subscribers a monthly credit towards their phone service or qualifying broadband service.

Lifeline Eligibility

Customers can get Lifeline Assistance when participating in one of the following programs:

- Medicaid
- Supplemental Security Income (SSI)
- Supplemental Nutrition Assistance Program (SNAP)
- Federal Public Housing Assistance
- Veteran's Pension or Survivor's Pension Benefit

OR

- Yearly gross household income is at or below 135% of the Federal Poverty Guidelines.

If you reside on federally recognized tribal lands, you may be eligible for additional benefits.

For more information on this federal program, please visit the Universal Service Administrative Company (USAC) at www.lifesupport.org. You may apply online or receive an application at www.checklifeline.org*. You may reach USAC at 1-800-234-9473 with questions. TDS can assist with questions or mail you an application. To contact TDS, visit tdstelecom.com/lifeline.html or 1-888-CALL-TDS. **1-888-CALL-TDS.**

* CA and OR consumers may not use www.checklifeline.org.



*Lifeline is a government assistance program. It is non-transferable. Only eligible consumers may enroll in the program. There is a limit of one discount per household. Lifeline credits on internet service are only available where minimum supported broadband service is available. In California, and New York other criteria established by the state may qualify you for the **state** Lifeline program. In California, Maine, Minnesota, New York, Oregon, and South Carolina state Lifeline credits cannot be applied to internet service.*

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