

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

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In the Matter of the Annual Certifications
Related to Eligible Telecommunications
Carriers' (ETC) Use of Federal Universal
Service Support

DOCKET NO. P-999/PR-21-8

**COMMENTS OF THE OFFICE
OF THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments providing recertification recommendations to the Minnesota Public Utilities Commission (“Commission”) for those Minnesota eligible telecommunications carriers (“ETCs”) that receive, have received, or will receive, federal Universal Service High Cost Program (“High Cost Program” or “High Cost”) funding.¹ While the OAG makes some general recommendations for Minnesota’s High Cost Program ETCs based on the High Cost Program rules, the federal Universal Service Lifeline Program (“Lifeline Program” or “Lifeline”) rules, and the Lifeline best practices order issued by the Commission on July 20, 2021, the OAG has identified no violations of program rules that would warrant a denial of ETC recertification for any filer at this time.² Accordingly, the OAG recommends recertification for all of Minnesota’s High Cost Program ETCs as discussed in further detail in these Comments.

BACKGROUND

I. STATE ETC DESIGNATION, RECERTIFICATION, AND SCHEDULE

A. ETC DESIGNATION

The Telecommunications Act of 1996 requires a telecommunications carrier to obtain an ETC designation to be eligible to receive funding from the High Cost Program and the Lifeline Program.³ Currently, the services supported by the federal Universal Service programs are voice

¹ ETCs that receive only federal Universal Service Lifeline Program funding file truncated versions of the FCC Form 481 and do not require annual recertification by the Commission.

² Note that the OAG had fewer than sixty (60) days to analyze the FCC Forms 481 filed by Minnesota High Cost Program ETCs. If the OAG later determines that a Minnesota High Cost Program ETC has violated program rules in a manner that warrants enhanced compliance obligations or a revocation of ETC status, the OAG will submit a filing in this or another appropriate Commission docket to provide recommendations about how to address the non-compliance.

³ 47 U.S.C. § 214(e)(1).

telephony services and broadband Internet access services (“BIAS”).⁴ With limited exceptions,⁵ state commissions are responsible for the designation of ETCs.⁶

B. ETC RECERTIFICATION

Every year, High Cost and Lifeline ETCs must file the information and certifications required by the federal Universal Service rules with the Universal Service Administrative Company (“USAC”).⁷ In furtherance of this requirement, the Federal Communications Commission (“FCC”) created the Form 481, a detailed and comprehensive form that all High Cost and Lifeline ETCs must file by July 1.⁸ Although the FCC no longer requires ETCs to file copies of their FCC Forms 481 with the states,⁹ the Commission issued an order in 2019 mandating that Minnesota ETCs electronically file their FCC Forms 481 with the state.¹⁰

States play a critical role in High Cost ETC recertification. As recognized by the FCC, “[t]he billions of dollars that the Universal Service Fund disburses each year to support vital communications services comes from American consumers and businesses, and recipients must be held accountable for how they spend that money.”¹¹ Accordingly, a state may adopt those ETC requirements it sees fit to preserve and advance federal Universal Service as long as the requirements are not inconsistent with the FCC’s rules.¹² In fact, the FCC’s High Cost ETC reporting and certification requirements reflect a “floor rather than a ceiling” for states and “state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the [federal Universal Service] statute and [the] implementing regulations. . . .”¹³

⁴ 47 C.F.R. § 54.101(a).

⁵ See 47 U.S.C. § 214(e)(6) (discussing ETC designation for common carriers not subject to state commission jurisdiction).

⁶ 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(b).

⁷ USAC Website, Annual Requirements, <https://www.usac.org/high-cost/annual-requirements/> (last visited Aug. 29, 2021). USAC is the designated permanent administrator of the federal Universal Service support mechanisms. See 47 C.F.R. § 54.701(a).

⁸ 47 C.F.R. § 54.313(j); see also Instructions to FCC Form 481 at 4, <https://www.usac.org/wp-content/uploads/high-cost/documents/Forms/FCC-Form-481-Instructions.pdf> (last visited Aug. 29, 2021).

⁹ *In the Matter of Connect America Fund ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Report and Order, FCC 17-87, para. 15 (2017).

¹⁰ *In the Matter of Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of the Federal Universal Service Support Required Pursuant to C.F.R. 54.313*, Docket No. P-999/PR-19-8, ORDER CERTIFYING ELIGIBLE TELECOMMUNICATIONS CARRIERS’ USE OF FEDERAL HIGH-COST SUBSIDY at 3-4 (Oct. 17, 2019) (“2019 ETC Order”).

¹¹ *In the Matter of Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, para. 568 (Nov. 18, 2011) (“2011 CAF Order”).

¹² See 47 U.S.C. § 254(f) (“A State may adopt regulations not inconsistent with the [FCC]’s rules to preserve and advance universal service.”).

¹³ 2011 CAF Order, paras. 573-74 (discussing state ETC authority).

C. MINNESOTA HIGH COST ETC RECERTIFICATION SCHEDULE

The Commission has previously established the following schedule for its annual recertification of Minnesota High Cost ETCs:

July 1	Deadline for High Cost ETCs to file petitions and supporting documentation, including the information required by the FCC Form 481. ¹⁴
September 1	Deadline for the OAG, the Minnesota Department of Commerce (“Department”), and other interested persons to file comments.
September 8	Deadline for reply comments. ¹⁵

In order for Minnesota ETCs to be eligible for High Cost Program support, the Commission must file its annual certification with the FCC and USAC by October 1 of each year. Specifically, the Commission must certify that High Cost Program funds were used in the previous year, and will be used in the coming year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.¹⁶ If the Commission submits its certification after October 1 of the applicable calendar year, the Minnesota High Cost Program ETCs may incur funding reductions.¹⁷

A list of the Minnesota High Cost ETCs that require Commission recertification by October 1, 2021 is provided in Table 1 of OAG Attachment A. Also included in OAG Attachment A is:

Table 2	A list of High Cost ETCs that will be recertified by other states but could also be recertified by the Commission;
Table 3	A list of ETCs that the Commission should not recertify; and
Tables 4 & 5	Lists of ETCs that submitted informational filings to the Commission, for which the Commission has no action item.

¹⁴ *In the Matter of the Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of Federal Universal Service Support Required Pursuant to 47 C.F.R. § 54.313*, Docket No. P-999/PR-21-8, Notice of Compliance Filing Period at 1 (May 25, 2021).

¹⁵ *In the Matter of Annual Certifications Related to Eligible Telecommunications Carriers’ Use of Federal Universal Service Support*, Docket No. P-999/PR-14-8 at 1 (Apr. 11, 2014).

¹⁶ 47 C.F.R. § 54.314(a).

¹⁷ 47 C.F.R. § 54.314(d).

II. HIGH COST PROGRAM RECERTIFICATION REQUIREMENTS AND ISSUES

A. HIGH COST PROGRAM FUNDING SUMMARY

In 2020, USAC disbursed \$248,056,604 to Minnesota-designated High Cost Program ETCs from nine (9) different High Cost Program funds.¹⁸ The table below details the disbursements from the nine (9) funds. No funds were disbursed from the Rural Digital Opportunity Fund (“RDOF”) in calendar year 2020, so there are no RDOF funding amounts included in the table.

Fund Name	Fund Acronym	Funding Disbursed in MN - 2020
Alternative Connect America Model	ACAM	\$ 66,216,232
Alternative Connect America Model II	ACAM II	\$ 57,149,526
Connect America Cost Model	CACM	\$ 85,622,880
Connect America Fund Broadband Loop Support	BLS	\$ 10,552,199
Connect America Fund Intercarrier Compensation	ICC	\$ 18,337,596
Connect America Fund Phase II Auction	CAF II Auc	\$ 3,862,859
Frozen High Cost Support	FHCS	\$ 1,353,132
High Cost Loop	HCL	\$ 4,620,384
Rural Broadband Experiment	RBE	\$ 41,796
Total		\$248,056,604

A brief description of each of these funds is included in Attachment B.

B. FEDERAL HIGH COST PROGRAM ANNUAL CERTIFICATION REQUIREMENTS.

Pursuant to the FCC’s rules, each year High Cost Program ETCs must provide information and a certification demonstrating:

- They are able to function in emergency situations.
- The pricing of their voice services is no more than two standard deviations above the applicable national average urban rate for voice service.
- Their pricing of a service that meets the FCC’s broadband public interest obligations is no more than the applicable benchmark or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states where the ETC receives support.
- Holding company, operating company, affiliate, and any doing-business-as or other branding designations, as well as the related Study Area Codes (“SAC”).
- If applicable, that the ETC had discussions with Tribal governments that, at a minimum, included:
 - A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
 - Feasibility and sustainability planning;

¹⁸ Disbursements reported in whole dollars without rounding.

- Marketing services in a culturally sensitive manner;
 - Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
 - Compliance with Tribal business and licensing requirements.
- The results of network performance tests pursuant to the methodology and in the format determined by the FCC’s Wireline Competition and Wireless Telecommunications Bureaus, and the Office of Engineering and Technology.¹⁹

C. FEDERAL HIGH COST PROGRAM BUILD-OUT MILESTONES

High Cost Program ETCs that are subject to specific build-out milestones are required to notify the FCC, USAC, and their states within ten (10) business days if they fail to meet an applicable build-out milestone.²⁰ Failure to meet a build-out milestone may trigger additional reporting obligations, withholding of support, and/or a recovery action by USAC.²¹ “[I]f a state commission determines, after reviewing the annual section 54.313 report, that an ETC did not meet its speed or build-out requirements for the prior year, a state commission should refuse to certify that support is being used for the intended purposes.”²² Where a state has a concern regarding a High Cost ETC’s build-out performance, it is empowered to make a recommendation to the FCC regarding prospective High Cost Program support adjustments or whether to recover past support amounts.²³ Although a state may also elect to revoke a company’s ETC’s status, such a remedy should not be invoked except in the most egregious circumstances and state commissions should first explore other alternatives to remedy concerns about an ETC’s performance.²⁴

D. STATE HIGH COST PROGRAM ANNUAL CERTIFICATION REQUIREMENTS.

Each year, concurrent with its FCC Form 481 filing, a Minnesota High Cost Program ETC must file with the Commission an affidavit that includes:

- The position of the affiant;
- That the affiant understands and is familiar with the requirements of the FCC concerning federal Universal Service funding;
- That the funds are and will be used appropriately (i.e., for their intended purposes);
- That the company is compliant with applicable rules on service quality and consumer protection; and
- That there is sufficient backup power to ensure functionality without an external power source, and the company is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergencies.²⁵

¹⁹ 47 C.F.R. § 54.313(a)(1)-(6).

²⁰ 47 C.F.R. § 54.320(d).

²¹ 47 C.F.R. §§ 54.315(c)(4)(i); 54.320(d).

²² 2011 CAF Order, para. 612.

²³ *Id.*

²⁴ *Id.*, para. 618.

²⁵ *In the Matter of Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of the Federal Universal Service Support Required Pursuant to § C.F.R. 54.313*, Docket No. P-999/PR-18-8 at 3, ORDER CERTIFYING (Footnote Continued on Next Page)

A Minnesota High Cost Program ETC that serves on Tribal lands is required to work with the Commission's and the Department's Tribal Liaisons.²⁶

E. HIGH COST PROGRAM ITEMS FOR DISCUSSION

ITEM NO. 1: FCC High Cost Recertification Requirements - Whether the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A complied with the FCC's recertification requirements for High Cost Program support (see section II.B above).

CONCLUSION: All of the High Cost ETCs listed in Table 1 of OAG Attachment A provided the required certifications.

There is no Commission follow-up required for this item.

ITEM NO. 2: Commission Affidavit – Whether the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A filed the Commission-required affidavits (see section II.D above).

CONCLUSION: All of the High Cost ETCs listed in Table 1 of OAG Attachment A filed the Commission-required affidavit. The OAG identified one High Cost ETC that filed an unexecuted affidavit but was otherwise compliant with federal and state High Cost Program requirements. The Commission could require the ETC to file a replacement affidavit within thirty (30) days of the Commission's 2021 ETC recertification order. In the alternative, the Commission could accept the unexecuted affidavit but direct all High Cost ETCs to file executed affidavits with their Minnesota FCC Form 481 filings in the future.

The Commission could require any Minnesota High Cost ETC that has not filed an executed affidavit to file a replacement affidavit within thirty (30) days of the Commission's 2021 ETC recertification order. In the alternative, the Commission could direct all High Cost ETCs to file executed affidavits with their Minnesota FCC Form 481 filings in future years.

ITEM NO. 3: Form 481 Filing – Whether the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A filed their FCC Forms 481 with the Commission.

CONCLUSION: In 2019, the Commission issued an order requiring ETCs to file their FCC Forms 481 with the state. All of the Minnesota High Cost ETCs listed

ELIGIBLE TELECOMMUNICATIONS CARRIERS' USE OF FEDERAL HIGH-COST SUBSIDY AND REQUIRING COMMENT PERIOD at 3 (Oct. 24, 2018).

²⁶ 2019 ETC Order at 3. Note that the FCC has contemplated that ETCs that "fail[] to satisfy the Tribal government engagement obligation would be subject to financial consequences, including potential reduction in support should they fail to fulfill their engagement obligations." 2011 CAF Order, para. 637.

in Table 1 of OAG Attachment A filed copies of their FCC Forms 481 with the state.

There is no Commission follow-up required for this item.

ITEM NO. 4: Tribal Outreach – Whether the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A met their Tribal engagement obligations.

CONCLUSION: In 2019, the Commission directed Minnesota High Cost ETCs serving Tribal lands to fully cooperate with the Department, the Tribes, and the Commission. The OAG defers to the Department regarding whether the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A met their Tribal engagement obligations in 2020.

The OAG defers to the Department regarding whether there is Commission follow-up required for this item.

ITEM NO. 5: Results of Network Performance Testing – Whether the Minnesota High Cost ETCs provided the Commission with sufficient information about their network performance testing.

CONCLUSION: In 2019, the FCC Wireline Competition and Wireless Telecommunications Bureaus, and the Office of Engineering Technology released the format for network performance testing.²⁷ The FCC established January 1, 2020 as the earliest pre-testing start date and July 1, 2020 as the earliest testing start date.²⁸ In 2020, the FCC granted limited waivers of the performance testing requirements for ACAM, ACAM-I, RBE, and CAF II, reducing the pre-test sample sizes.²⁹ Given the late start for network performance testing, the FCC waiver orders, and the challenges faced by the applicable Minnesota High Cost ETCs due to the COVID-19 pandemic, the OAG continues to recommend postponing review of this item until the calendar year 2022 High Cost ETC recertification process.

There is no Commission follow-up required for this item.

²⁷ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, FCC 19-104, para. 81 (Oct. 31, 2019) (establishing pre-testing and testing start dates for each of the High Cost Program funds).

²⁸ *Id.*

²⁹ See generally *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order, DA 20-121 (Feb. 3, 2020) (waiving and modifying pre-testing requirements); *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order, DA 20-1512 (Dec. 21, 2020) (same as previous).

ITEM NO. 6: Offering of Stand-Alone Voice Service – Whether the Minnesota High Cost ETCs that receive CAF and ACAM funding are offering the required stand-alone voice service.

CONCLUSION: High Cost ETCs that receive CAF and ACAM funding are required to offer stand-alone voice service.³⁰ The OAG was able to locate a stand-alone voice service for most of the applicable Minnesota High Cost ETCs. If the OAG was not able to locate an ETC's stand-alone voice service offering, it contacted the ETC for more information. All of the ETCs contacted by the OAG addressed the OAG's concerns and pointed the OAG to a stand-alone voice service offering.

There is no Commission follow-up required for this item.

ITEM NO. 7: Build-Out Milestones – Whether the Minnesota High Cost ETCs met their build-out milestones.

CONCLUSION: Two Minnesota High Cost ETCs filed letters in January 2021 notifying the FCC that they may not have met their 2020 deployment milestones in Minnesota.³¹ The OAG will monitor the future FCC filings of these two ETCs to confirm that they complete their calendar year 2020 buildout obligations by December 31, 2021, as required by FCC Rule 54.320(d)(2).³²

There is no Commission follow-up required for this item.

ITEM NO. 8: Minnesota High Cost ETCs the Commission Should Recertify – Whether the Commission should recertify the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A.

CONCLUSION: The Minnesota High Cost ETCs that require Commission recertification are listed in Table 1 of OAG Attachment A. The OAG reviewed the information filed by these ETCs and issued information requests if it had questions or concerns about a specific ETC's practices. All of the ETCs contacted by the OAG provided prompt and thorough responses to the OAG's inquiries and addressed the OAG's concerns. Accordingly, the OAG recommends recertification for all the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A.

The Commission should recertify all the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A.

³⁰ *In the Matter of Connect America Fund et al.*, WC Docket No. 10-90 et al., Order on Reconsideration, FCC 18-5, para. 20 (2018) (describing the genesis of, and reiterating, the stand-alone voice telephony requirement).

³¹ *See generally* Letter from K. Mason, Senior Vice President of Regulatory & Government Affairs, Frontier Communications, to M. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (Jan. 15, 2021); Letter from J. Lanning, Vice President of Federal Regulatory Affairs, CenturyLink, to M. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (Jan. 15, 2021).

³² 47 C.F.R. § 54.320(d)(2).

ITEM NO. 9: High Cost ETCs that Primarily Operate in Other States – Whether it is necessary for the Commission to recertify High Cost ETCs that primarily operate in other states.

CONCLUSION: Some of the High Cost ETCs on the Commission’s recertification list primarily operate in other states. These ETCs are included on the recertification lists of both Minnesota and the other states. A list of these ETCs with the states in which they primarily operate is provided below and in Table 2 of OAG Attachment A.

<u>Company/ETC Name</u>	<u>SAC</u>	<u>State</u>
CenturyTel NW WI	330950	WI
CenturyTel Chester	351126	IA
Polar Telecomm.	381614	ND
Polar Comm Mut Aid	381630	ND
Red River Rural Telephone	381631	ND
Splitrock Telecom Cooperative Inc.	391657	SD
Hills Tel Co-SD	391405	SD

CONCLUSION: CenturyTel NW WI (SAC 330950), CenturyTel Chester (SAC 351126), Red River Rural Telephone (SAC 381631), and Hills Tel Co-SD (SAC 391405) filed FCC Forms 481 with the Commission. The OAG reviewed the information filed by these High Cost ETCs and does not have any concerns about their High Cost Program compliance.

Polar Telecomm (SAC 381614), Polar Comm Mut Aid (SAC 381630), and Splitrock Telecom Cooperative Inc. (SAC 391657) did not file FCC Forms 481 with the Commission. Because these High Cost ETCs did not file in Minnesota, the OAG was not able to assess their High Cost Program compliance.

As with last year, the Department confirmed that all of the above-listed High Cost ETCs will be recertified by the other states in which they operate. If those other states fail to recertify the ETCs by October 1, 2021, however, the ETCs’ High Cost support for Minnesota could be reduced.³³ In past years, the Commission has recertified the High Cost ETCs that primarily operate in other states without incident. Because the Department confirmed that the other states intend to recertify these ETCs, the Commission could also recertify them to reduce the potential for an inadvertent funding reduction due to late certification.

The Commission could recertify all or some of the High Cost ETCs listed in Table 2 of OAG Attachment A, or it could rely solely on the other states’ recertification processes.

³³ 47 C.F.R. § 54.314(d).

ITEM NO. 10: ETCs the Commission should Not Recertify – Whether the Commission should recertify all of the ETCs on its recertification list.

CONCLUSION: This year’s High Cost recertification list contains ETCs that did not file any information in Commission Docket No. 21-8 either because their SACs are no longer active or they are Lifeline-only providers. These ETCs are listed in Table 3 of OAG Attachment A. USAC has informed the OAG and the Department that it will remove these ETCs from Minnesota’s High Cost recertification list in future years but cannot do so now. Because the ETCs listed in Table 3 of OAG Attachment A do not receive High Cost Program support, the Commission should *not* recertify these ETCs.

The Commission should not recertify the ETCs listed in Table 3 of OAG Attachment A.

III. LIFELINE PROGRAM RECERTIFICATION REQUIREMENTS AND ISSUES

A. FEDERAL LIFELINE PROGRAM ANNUAL CERTIFICATION REQUIREMENTS FOR HIGH COST ETCs

All ETCs are required to offer Lifeline services to qualifying low income consumers throughout their designated service areas.³⁴ In addition, they must advertise the availability of Lifeline services in a manner reasonably designed to reach the eligible households within their designated service areas.³⁵ USAC provides guidance on materials and methods to reach eligible households that do not currently receive Lifeline services including, among other things:

- Posting notices at public transportation stops and agencies, shelters, and soup kitchens;
- Running public service announcements; and
- Providing information booths at central locations.³⁶

USAC also recommends developing Lifeline advertising that can be read by any sizeable non-English speaking populations and coordinating with governmental agencies that administer government assistance programs, such as social service agencies, tribal organizations, community centers, public schools, and nursing homes.³⁷

Under the FCC’s rules, High Cost Program ETCs that receive Lifeline Program support must annually report holding company, operating company, affiliate, and any doing-business-as or other branding designations, as well as the applicable SACs; and information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including

³⁴ 47 C.F.R. § 54.405(a).

³⁵ 47 C.F.R. § 54.405(b).

³⁶ USAC Website, Lifeline–Additional Requirements–Advertise Lifeline, <https://www.usac.org/lifeline/additional-requirements/advertise-lifeline/> (last visited Aug. 29, 2021).

³⁷ *Id.*

details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan.³⁸

B. STATE LIFELINE PROGRAM BEST PRACTICES FOR HIGH COST ETCs

On November 25, 2020, the Commission issued an order initiating an investigation into issues related to the offering and advertising of Lifeline services by the Minnesota High Cost ETCs.³⁹ On July 20, 2021, the Commission issued an order establishing best practices for the Minnesota High Cost Program ETCs to meet when advertising the Lifeline Program (“Lifeline Best Practices Order”).⁴⁰ Specifically, and to the “maximum extent possible”,⁴¹ Minnesota High Cost ETCs must implement the following best practices:

- A website that meets the following criteria:
 - information within three clicks;
 - searchable keywords;
 - periodic functionality checks;
 - all plan information displayed; and
 - continual updates;
- Social media accounts;
- Regular outreach to social service agencies;
- Assign one employee to act as a Lifeline Champion, or train all employees on Lifeline at larger ETCs;
- Community outreach through various means;
- Tribal outreach;
- Diverse and disabled population outreach;
- Lifeline information on all disconnection notices;
- Paper materials in various formats; and
- Participate in Lifeline Awareness Week.⁴²

The Best Practices Order also required High Cost Program ETCs to file a narrative of their Lifeline outreach efforts in this docket and stated that compliance with best practices (or reasons for noncompliance) would be reviewed as part of the recertification process.⁴³

³⁸ 47 C.F.R. § 54.422(a). To the extent an ETC offers a plan(s) to Lifeline subscribers that is generally available to the public, the ETC may provide summary information regarding such a plan(s), such as a link to a public website that outlines the terms and conditions of the plan(s). 47 C.F.R. § 54.422(a)(2).

³⁹ See *In the Matter of the Annual Certification Related to Eligible Telecommunications Carriers’ (ETCs) Use of Federal Universal Service Support Required Pursuant to C.F.R. 54.313*, Docket No. P-999/PR-20-8, ORDER CERTIFYING ELIGIBLE TELECOMMUNICATIONS CARRIERS’ USE OF FEDERAL HIGH-COST SUBSIDY at 4 (Nov. 25, 2020).

⁴⁰ *In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs*, Docket No. P-999/CI-20-747, ORDER ESTABLISHING BEST PRACTICES AND REQUIRING FILINGS at 8-9 (July 20, 2021).

⁴¹ *Id.* at 8.

⁴² *Id.* at 8-9.

⁴³ *Id.* at 9.

C. LIFELINE PROGRAM ITEMS FOR DISCUSSION

The OAG contacted most of the Minnesota High Cost Program ETCs (or their consultants) regarding one or more aspects of the ETCs' Lifeline Program compliance. All of the ETCs promptly and thoroughly responded to the OAG's Lifeline concerns. It is encouraging that the Minnesota High Cost ETCs adopted a positive and collaborative approach to ensuring compliance with the FCC's Lifeline Program rules and the Commission's Lifeline Best Practices Order.

ITEM NO. 1: Whether the Minnesota High Cost ETCs filed the required Lifeline outreach narrative in this docket.

CONCLUSION: On August 2, 2021, approximately one month after Minnesota High Cost Program ETCs were required to file their FCC Forms 481 with the state, the Commission issued a Notice of Lifeline Outreach Filing Requirement for High Cost ETCs in this docket ("Lifeline Notice").⁴⁴ The Lifeline Notice requires Minnesota High Cost ETCs to file a narrative of their Lifeline advertising and outreach efforts, if they have not already done so.⁴⁵ As of the morning of August 31, 2021, only ten (10) Minnesota High Cost Program ETCs had filed a Lifeline advertising and outreach narrative in response to the Lifeline Notice.⁴⁶ However, the remaining ETCs either responded to a similar Lifeline notice in Docket No. 20-747,⁴⁷ or provided links to their Lifeline webpages and/or pdfs of their Lifeline advertising information as part of their FCC Form 481 filings. Given the short timeframe for the Minnesota High Cost Program ETCs to file their Lifeline narratives and because they all submitted Lifeline Program advertising and outreach information in some form, the Commission should consider its Lifeline advertising and outreach narrative requirement met.

There is no Commission follow-up required for this item.

ITEM NO. 2: Whether the Minnesota High Cost ETCs provided active Lifeline weblinks or websites that could be found.

CONCLUSION: The Lifeline weblinks provided in the FCC Forms 481 of a few the Minnesota High Cost ETCs did not work and/or a working website could not be

⁴⁴ See generally *In the Matter of a Commission Inquiry into the Advertising, Outreach, and Offering of Lifeline by High-Cost ETCs*, Docket Nos. P-999/CI-20-747 and P-999/PR-21-8, Notice of Lifeline Outreach Filing Requirement for High Cost ETCs (Aug. 2, 2021).

⁴⁵ *Id.* at 1.

⁴⁶ The ETCs that filed a Lifeline narrative with the Commission are:

1) Broadband Corp.; 2) TDS Telecom (including Arvig Telephone Company, Bridge Water Telephone Company, Mid-State Telephone Company, and Winsted Telephone Company); 3) Ace Telephone Association; 4) Jaguar Communications, Inc. d/b/a MetroNet; 5) Wilderness Valley Telephone Company; 6) Northern Telephone Company; 7) Citizens Telecommunications Company of Minnesota, LLC; 8) Frontier Communications of Minnesota, Inc.; 9) LTD Broadband LLC; and 10) Winnebago Cooperative Telecom Association.

⁴⁷ See generally Docket No. P-999/CI-20-747, Notice of Comment Period (Oct. 7, 2020).

found. All of the ETCs contacted by the OAG either directed the OAG to an updated link or promptly fixed their weblinks and/or websites.⁴⁸

There is no Commission follow-up required for this item.

ITEM NO. 3: Whether the Minnesota High Cost ETCs provided Lifeline-specific home pages.

CONCLUSION: The majority of the Minnesota High Cost ETCs that have websites have Lifeline-specific home pages. The OAG contacted the ETCs for whom it was not able to find a Lifeline-specific home page or Lifeline-specific information. All of the High Cost ETCs contacted by the OAG either directed the OAG to a Lifeline-specific home page or to Lifeline-specific information that was reachable within three clicks or less from the ETC's home page.

There is no Commission follow-up required for this item.

ITEM NO. 4: Whether the Minnesota High Cost ETCs' websites provided Lifeline plan information regarding minutes and usage parameters, eligibility and sign-up, terms and conditions, and toll call and additional service charges.

CONCLUSION: As with last year, while the majority of the High Cost ETCs provided eligibility and sign-up information on their websites, many of them did not include minutes and usage, terms and conditions, and/or toll and additional service charge information. The OAG contacted the ETCs for whom it was unable to find this information to determine if/where such information exists. All of the High Cost ETCs contacted by the OAG either directed the OAG to the Lifeline plan information or explained that they are working to add the information to their websites.

There is no Commission follow-up required for this item.

⁴⁸ Two Minnesota High Cost ETCs, Northern Telephone Company ("Northern") and Wilderness Valley Telephone Company ("Wilderness") filed information in this docket stating that they do not have websites due their small size and high Lifeline participation rates. *See generally* Docket No. P-999/PR-21-8, Lifeline Outreach Narratives of Northern and Wilderness (Aug. 9, 2021). According to these ETCs, they receive annual support amounts of approximately \$10,000 and \$22,000 respectively and are prioritizing the use of the funds to deploy high-speed broadband connections to their customers. *Id.* These ETCs have not ruled out the idea of establishing websites for their customers. Rather, they have declined to do so until their customers have the necessary high-speed broadband connections. *Id.* Based on the detailed information provided by Northern and Wilderness, because the Commission only recently released its Lifeline Best Practices Order, and because the order requires compliance only to the "maximum extent possible", the OAG recommends following up with Northern and Wilderness again next year to revisit whether they plan to launch websites that contain Lifeline Program information.

ITEM NO. 5: Whether the Lifeline Program and TAP discount amounts on the Minnesota High Cost ETCs' websites were correct.

CONCLUSION: A number of the Minnesota High Cost ETCs had outdated Lifeline and/or TAP discount information on their websites. The OAG contacted the ETCs whose websites contained outdated Lifeline and/or TAP discount information. All of the High Cost ETCs contacted by the OAG promptly updated the discount information or indicated that they would do so shortly, as part of a broader refresh of the information on their websites. In addition, all of the ETCs stated that they would conduct at least annual checks of their websites to ensure that the Lifeline/TAP discount information is correct.

There is no Commission follow-up required for this item.

ITEM NO. 6: Whether the Minnesota High Cost ETCs made Tribal governments aware of enhanced Lifeline benefits for Tribal lands.

CONCLUSION: As noted in section II.E above, the OAG defers to the Department regarding whether the Minnesota High Cost Program ETCs have met their Tribal engagement obligations.

The OAG defers to the Department regarding whether there is Commission follow-up required for this item.

IV. SUMMARY OF RECOMMENDATIONS

The OAG recommends that the Commission take the following actions with respect to the ETCs on its annual High Cost recertification list:

- Consider requiring any Minnesota High Cost ETC that has not filed an executed affidavit to file a replacement affidavit within thirty (30) days of the Commission's 2021 ETC recertification order and/or remind the High Cost ETCs to file executed affidavits with their Minnesota FCC Form 481 filings;
- Recertify all the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A;
- Recertify some or all of the High Cost ETCs listed in Table 2 of OAG Attachment A; and
- Deny recertification for the ETCs listed in Table 3 of OAG Attachment A.

CONCLUSION

The OAG recommends that the Commission recertify all of the Minnesota High Cost ETCs listed in Table 1 of OAG Attachment A. The Commission should consider recertifying the High Cost ETCs in Table 2 of OAG Attachment A to prevent an inadvertent reduction in those ETCs' High Cost support for Minnesota. If the OAG identifies a violation of the federal Universal Service rules by a High Cost ETC after the Commission submits its 2021 recertification list to USAC, the

OAG will submit a filing in this or another Commission docket to provide recommendations to address any federal Universal Service non-compliance.

Dated: August 31, 2021

Respectfully submitted,

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ATTORNEYS FOR OFFICE OF
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RESIDENTIAL UTILITIES DIVISION

OAG Attachment A

2021 Eligible Telecommunications Carriers for Recertification by the Minnesota Public Utilities Commission

I. HIGH COST ETCs THAT THE MINNESOTA PUBLIC UTILITIES COMMISSION SHOULD RECERTIFY

The eligible telecommunications carriers (“ETC”) listed below are included on Minnesota’s federal Universal Service High Cost Program (“High Cost Program”) recertification list and should be recertified by the Minnesota Public Utilities Commission (“Commission”). The Minnesota Office of the Attorney General—Residential Utilities Division (“OAG”) reviewed the filings of each listed ETC and found no violations of the federal Universal Service rules, Federal Communications Commission (“FCC”) orders, or the Commission’s Lifeline Best Practices Order that would warrant a denial of ETC recertification. Accordingly, the OAG recommends recertification for all of the Minnesota High Cost Program ETCs listed in Table 1.

Table 1 Minnesota High Cost ETCs that the Commission Should Recertify					
No.	Study Area Code (“SAC”)	Carrier Name	State	Carrier Type	2021 Certification (Y/N)
1	361346	ACE TEL ASSN-MN	MN	ILEC	Y
2	361347	ALBANY MUTUAL ASSN	MN	ILEC	Y
3	361374	ARROWHEAD COM CORP	MN	ILEC	Y
4	361350	ARVIG TEL CO	MN	ILEC	Y
5	361356	BENTON COOP TEL CO	MN	ILEC	Y
6	361358	BLUE EARTH VALLEY	MN	ILEC	Y
7	361362	BRIDGEWATER TEL CO	MN	ILEC	Y
8	369043	Broadband Corp	MN	CETC	Y
9	361365	CALLAWAY TEL CO	MN	ILEC	Y
10	361440	CANNON VLY TELECOM	MN	ILEC	Y
11	361445	CENTURYTEL-MINNESOTA	MN	ILEC	Y
12	361425	CHRISTENSEN COMM CO	MN	ILEC	Y
13	361123	CITIZENS-FRONTIER-MN	MN	ILEC	Y
14	367123	CITIZENS-FRONTIER-MN	MN	ILEC	Y
15	361353	CITY OF BARNESVILLE	MN	ILEC	Y
16	361370	CLARA CITY TEL EXCH	MN	ILEC	Y
17	361372	CLEMENTS TEL CO	MN	ILEC	Y
18	361373	CONSOLIDATED TEL CO	MN	ILEC	Y
19	369044	Consolidated Telephone Company	MN	CETC	Y
20	361499	CROSSLAKE TEL CO	MN	ILEC	Y
21	361381	DUNNELL TEL CO	MN	ILEC	Y
22	361383	EAGLE VALLEY TEL CO	MN	ILEC	Y
23	361385	EAST OTTER TAIL TEL	MN	ILEC	Y
24	361384	EASTON TEL CO	MN	ILEC	Y
25	361386	ECKLES TEL CO	MN	ILEC	Y
26	361456	EMBARQ MINNESOTA	MN	ILEC	Y

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**2021 Eligible Telecommunications Carriers for Recertification
by the Minnesota Public Utilities Commission**

<u>Table 1</u> Minnesota High Cost ETCs that the Commission Should Recertify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	2021 Certification (Y/N)
27	361387	EMILY COOP TEL CO	MN	ILEC	Y
28	361389	FARMERS MUTUAL TEL	MN	ILEC	Y
29	361390	FEDERATED TEL COOP	MN	ILEC	Y
30	366130	Federated Telephone Cooperative	MN	CETC	Y
31	361403	FEDERATED UTILITIES	MN	ILEC	Y
32	361393	FELTON TEL CO. INC.	MN	ILEC	Y
33	361367	FRONTIER-MINNESOTA	MN	ILEC	Y
34	361395	GARDEN VALLEY TEL CO	MN	ILEC	Y
35	369039	Garden Valley Telephone Company	MN	CETC	Y
36	361396	GARDONVILLE COOP TEL	MN	ILEC	Y
37	361399	GRANADA TEL CO	MN	ILEC	Y
38	361401	HALSTAD TEL CO	MN	ILEC	Y
39	369007	TEKSTAR COMMUNICATIONS, INC.	MN	CETC	Y
40	369020	Farmers Mutual Telephone Company	MN	CETC	Y
41	369040	Halstad Telephone Company	MN	CETC	Y
42	361404	HARMONY TEL. CO.	MN	ILEC	Y
43	361405	HILLS TEL CO, INC	MN	ILEC	Y
44	361408	HOME TEL CO – MN	MN	ILEC	Y
45	361409	HUTCHINSON TEL CO	MN	ILEC	Y
46	361654	INTERSTATE TELECOMM.	MN	ILEC	Y
47	369041	Interstate Telecommunications Cooperative, Inc.	MN	CETC	Y
48	369038	Jaguar Communication, Inc	MN	CETC	Y
49	361410	JOHNSON TEL CO	MN	ILEC	Y
50	361412	KASSON & MANTORVILLE	MN	ILEC	Y
51	361419	LISMORE COOP TEL CO	MN	ILEC	Y
52	361422	LONSDALE TEL CO	MN	ILEC	Y
53	361443	LORETEL SYSTEMS, INC	MN	ILEC	Y
54	369047	LTD Broadband LLC	MN	CETC	Y
55	361424	MABEL COOP TEL - MN	MN	ILEC	Y
56	361426	MANCHESTER-HARTLAND	MN	ILEC	Y
57	361427	MANKATO-HICKORYTECH	MN	ILEC	Y
58	361430	MELROSE TEL CO	MN	ILEC	Y
59	361375	MID-COMM-HICKORYTECH	MN	ILEC	Y
60	369015	Midcontinent Communications	MN	CETC	Y
61	361413	MID STATE DBA KMP	MN	ILEC	Y

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**2021 Eligible Telecommunications Carriers for Recertification
by the Minnesota Public Utilities Commission**

<u>Table 1</u> Minnesota High Cost ETCs that the Commission Should Recertify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	2021 Certification (Y/N)
62	361433	MID STATE TEL CO	MN	ILEC	Y
63	361431	MIDWEST TEL CO	MN	ILEC	Y
64	361439	MINNESOTA VALLEY TEL	MN	ILEC	Y
65	361442	NEW ULM TELECOM, INC	MN	ILEC	Y
66	361500	NORTHERN TEL CO – MN	MN	ILEC	Y
67	361448	OSAKIS TEL CO	MN	ILEC	Y
68	361450	PARK REGION MUTUAL	MN	ILEC	Y
69	361451	PAUL BUNYAN RURAL	MN	ILEC	Y
70	366132	Paul Bunyan Rural Telephone Cooperative	MN	CETC	Y
71	366133	Paul Bunyan Rural Telephone Cooperative	MN	CETC	Y
72	361453	PEOPLES TEL CO – MN	MN	ILEC	Y
73	361454	PINE ISLAND TEL CO	MN	ILEC	Y
74	365142	QWEST CORP-MN	MN	ILEC	Y
75	361472	REDWOOD COUNTY TEL	MN	ILEC	Y
76	369045	Roseau Electric Cooperative, Inc.	MN	CETC	Y
77	361474	ROTHSAY TEL CO, INC	MN	ILEC	Y
78	361475	RUNESTONE TEL ASSN	MN	ILEC	Y
79	361423	Runestone Telephone Association	MN	ILEC	Y
80	361476	SACRED HEART TEL CO	MN	ILEC	Y
81	361479	SCOTT RICE – INTEGRA	MN	ILEC	Y
82	361483	SLEEPY EYE TEL CO	MN	ILEC	Y
83	361485	SPRING GROVE COOP	MN	ILEC	Y
84	361487	STARBUCK TEL CO	MN	ILEC	Y
85	361491	TWIN VALLEY-ULEN TEL	MN	ILEC	Y
86	361494	UPSALA COOP TEL ASSN	MN	ILEC	Y
87	361495	VALLEY TEL CO – MN	MN	ILEC	Y
88	361501	WEST CENTRAL TEL	MN	ILEC	Y
89	369042	West Central Telephone Association	MN	CETC	Y
90	361502	WESTERN TEL CO	MN	ILEC	Y
91	361505	WIKSTROM TEL CO, INC	MN	ILEC	Y
92	369046	Wikstrom Telephone Company	MN	CETC	Y
93	361348	WILDERNESS VALLEY	MN	ILEC	Y
94	361414	Windstream Communications, Inc.	MN	ILEC	Y
95	361482	Windstream Communications, Inc.	MN	ILEC	Y
96	361337	WINNEBAGO COOP ASSN	MN	ILEC	Y

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2021 Eligible Telecommunications Carriers for Recertification by the Minnesota Public Utilities Commission

Table 1 Minnesota High Cost ETCs that the Commission Should Recertify					
No.	Study Area Code ("SAC")	Carrier Name	State	Carrier Type	2021 Certification (Y/N)
97	361507	WINSTED TEL CO	MN	ILEC	Y
98	361508	WINTHROP TEL CO	MN	ILEC	Y
99	361512	WOLVERTON TEL CO	MN	ILEC	Y
100	361510	WOODSTOCK TEL CO	MN	ILEC	Y
101	361515	ZUMBROTA TEL CO	MN	ILEC	Y

II. HIGH COST ETCs THAT WILL BE CERTIFIED BY OTHER STATES BUT COULD ALSO BE CERTIFIED BY THE COMMISSION

The High Cost ETCs listed below are included on Minnesota's recertification list but the Minnesota Department of Commerce ("Department") has confirmed that the ETCs will be recertified by other states. To ensure no reduction in these ETCs' High Cost Program support for Minnesota, the Commission could recertify them even though they will also be recertified by other states.

CenturyTel NW WI (SAC 330950), CenturyTel-Chester (SAC 351126), Red River Rural Telephone (SAC 381631), and Hills Tel Co-SD (SAC 391405) filed FCC Forms 481 in Commission Docket No. 21-8. The OAG reviewed those filings and does not have any concerns about the recertification of these High Cost ETCs.

Polar Telecomm. (SAC 381614), Polar Comm Mut Aid (SAC 381630), and Splitrock Telecom Cooperative Inc. (SAC 391657) did not file information in Commission Docket No. 21-8 so the OAG was not able to assess their High Cost Program compliance. In past years, however, the Commission has recertified High Cost ETCs that primarily operate in other states without incident. Even though the Department confirmed that other states intend to recertify these ETCs, the Commission could also recertify them to reduce the potential for an inadvertent funding reduction due to late certification.

The Commission has the option of recertifying some or all of these High Cost ETCs.

Table 2 High Cost ETCs that Will be Certified by Other States but Could Also be Certified by the Commission					
No.	SAC	Carrier Name	Certifying State	Carrier Type	2021 Certification (Y/N)
1	330950	CenturyTel NW WI	WI	ILEC	Optional
2	351126	CENTURYTEL-CHESTER	IA	ILEC	Optional

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2021 Eligible Telecommunications Carriers for Recertification by the Minnesota Public Utilities Commission

Table 2 High Cost ETCs that Will be Certified by Other States but Could Also be Certified by the Commission					
No.	SAC	Carrier Name	Certifying State	Carrier Type	2021 Certification (Y/N)
3	381614	POLAR TELECOMM.	ND	ILEC	Optional
4	381630	POLAR COMM MUT AID	ND	ILEC	Optional
5	381631	Red River Rural Telephone	ND	ILEC	Optional
6	391405	HILLS TEL CO-SD	SD	ILEC	Optional
7	391657	SPLITROCK TELECOM COOPERATIVE INC.	SD	ILEC	Optional

III. ETCs THAT THE COMMISSION SHOULD NOT RECERTIFY.

The ETCs listed below are included on Minnesota's recertification list but did not file any information in Commission Docket No. 21-8 either because their SACs are no longer active or they are Lifeline-only providers. *The Commission should not recertify these ETCs.*

Table 3 ETCs that the Commission Should Not Recertify					
No.	SAC	Carrier Name	Certifying State	Carrier Type	2021 Certification (Y/N)
1	361357	BLACKDUCK TEL CO	MN	ILEC	N
2	361437	MINNESOTA LAKE TEL	MN	ILEC	N
3	366110	Lake County d/b/a Lake Connections ¹	MN	CETC	N
4	369001	WESTERN WIRELESS	MN	CETC	N
5	369002	MIDWEST WIRELESS COMMUNICATIONS	MN	CETC	N
6	369003	HOMETOWN SOLUTIONS	MN	CETC	N
7	369004	RCC MINNESOTA	MN	CETC	N
8	369005	WIRELESS ALLIANCE, LLC	MN	CETC	N
9	369008	NPCR, INC.	MN	CETC	N

¹ The Minnesota Public Utilities Commission granted Lake County's petition to relinquish its ETC status effective June 3, 2019. See *In the Matter of the Petition of Lake County for Relinquishment of ETC Designation*, Docket No. P-6944/RL-19-195, Order at 1 (July 21, 2020). The FCC rescinded Lake County's ETC status effective December 18, 2019. See *In the Matter of the Petition of Lake County Minnesota for Relinquishment of its Status as a Rural Broadband Experiments Support Recipient and for a Section 1.3 Waiver of the Deployment Schedule*, WC Docket Nos. 10-90 and 14-259, Order, DA 19-1295, para. 20 (Dec. 18, 2019). Although Lake County did not receive federal Universal Service High Cost Program funds in calendar year 2020, the company still appears on the Commission's 2021 High Cost Program ETC recertification list. The Universal Service Administrative Company has confirmed that it will remove Lake County from future Minnesota recertification lists but is unable to do so for the current recertification list.

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2021 Eligible Telecommunications Carriers for Recertification by the Minnesota Public Utilities Commission

Table 3 ETCs that the Commission Should Not Recertify					
No.	SAC	Carrier Name	Certifying State	Carrier Type	2021 Certification (Y/N)
10	369009	RCC Minnesota, Inc. (SMN)	MN	CETC	N
11	369012	Alltel Communications, LLC	MN	CETC	N
12	369013	Alltel Communications, LLC	MN	CETC	N
13	369014	T-Mobile Central LLC ²	MN	CETC	N
14	369032	Tracfone Wireless Inc.	MN	CETC	N
15	369909	AMERICAN CELLULAR CORPORATION	MN	CETC	N
16	369911	CELLULAR MOBILE SYSTEMS OF MN	MN	CETC	N

IV. HIGH COST ETCs FOR WHICH THE COMMISSION HAS NO ACTION ITEM (RURAL DIGITAL OPPORTUNITY FUND WINNING BIDDERS)

The High Cost ETCs listed below are *not* included on Minnesota's recertification list but filed information in Commission Docket No. 21-8, presumably because they are winning bidders in the FCC's recent Rural Digital Opportunity Fund ("RDOF") auction. The OAG appreciates the information provided by these filers.

There is no action item for the Commission with respect to these ETCs.

Table 4 Minnesota High Cost ETCs for which the Commission has no Action Item (i.e., Informational Only)				
No.	SAC	Carrier Name	Certifying State	2021 Certification (Y/N)
1	369021	Federated Telephone Cooperative	N/A	N/A
2	369029	Winnebago Cooperative Telecom Association	N/A	N/A
3	369049	Paul Bunyan Rural Telephone Cooperative	N/A	N/A
4	369050	Garden Valley Telephone Company	N/A	N/A
5	369914	C-I Communications	N/A	N/A

² The Commission approved T-Mobile's request to relinquish its High Cost Program ETC status effective December 31, 2020. *In the Matter of the Petition of T-Mobile Central LLC for Relinquishment of its High Cost Status as an Eligible Telecommunications Carrier (ETC)*, P-6856/M-20-894, ORDER at 1 (Feb. 23, 2021).

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2021 Eligible Telecommunications Carriers for Recertification by the Minnesota Public Utilities Commission

V. ETCs FOR WHICH THE COMMISSION HAS NO ACTION ITEM (LIFELINE-ONLY SUPPORT RECIPIENTS)

The ETCs listed below are *not* included on Minnesota's recertification list but filed information in Commission Docket No. 21-8, presumably because they are (or considered being) federal Universal Service Lifeline-only support recipients. The OAG appreciates the information provided by these filers.

There is no action item for the Commission with respect to these ETCs.

Table 5 ETCs for which the Commission has no Action Item (i.e., Informational Only)				
No.	SAC	Carrier Name	Certifying State	2021 Certification (Y/N)
1	369016	Telrite Corporation DBA Life Wireless	N/A	N/A
2	369022	Global Connection of America dba Stand Up Wireless	N/A	N/A
3	369023	I-Wireless	N/A	N/A
4	369024	Q Link Wireless	N/A	N/A
5	369025	Boomerang Wireless	N/A	N/A
6	369028	Tag Mobile, LLC	N/A	N/A
7	369033	Tempo Telecom, LLC	N/A	N/A
8	369034	Sage Telecom Communications, LLC	N/A	N/A
9	N/A	Assist Wireless, LLC ³	N/A	N/A

³ Assist Wireless filed a letter with the Commission on June 20, 2021 explaining that the company is not operational and has not been assigned a SAC. Accordingly, it has no FCC Form 481 to file with the Commission. *In the Matter of the Annual Certification Related to Eligible Telecommunications Carriers' (ETCs) Use of Federal Universal Service Support Required Pursuant to 47 C.F.R. § 54.313*, P-999/PR-21-8, Assist Wireless Carrier Annual Reporting Letter (June 20, 2021). See also *In the Matter of Assist Wireless's Petition for ETC Designation in Minnesota*, P-6978/M-17-213, ORDER GRANTING PETITION FOR ETC DESIGNATION WITH CONDITIONS at 1 (Nov. 15, 2017) (explaining that Assist sought an ETC designation to provide Lifeline-only service to qualified customers).

OAG Attachment B

Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2020

Alternative Connect America Model (ACAM)¹ – The Alternative Connect America Cost Model (ACAM) provides funding to rate-of-return carriers that voluntarily elected to transition to a new cost model for calculating High Cost support in exchange for meeting defined broadband build-out obligations. ACAM models the forward-looking economic costs of deploying a high-speed network and delivering broadband service. Carriers that elected this option receive predictable monthly payments to provide voice and broadband service to all funded locations over the program’s 10-year support term (2017-2026).

Deployment Requirements

Carriers must offer at least one commercial voice and one commercial broadband service that meet the relevant service requirements, and must meet the following broadband deployment milestones:

- 40% of deployments by the end of year 4
- 50% of deployments by the end of year 5
- 60% of deployments by the end of year 6
- 70% of deployments by the end of year 7
- 80% of deployments by the end of year 8
- 90% of deployments by the end of year 9
- 100% of deployments by the end of year 10

Alternative Connect America Cost Model II (ACAM II)² - Established by the 2018 Rate-of-Return Reform Order, the Alternative Connect America Cost Model (ACAM) II provides funding to rate-of-return carriers that voluntarily elected to transition to a new cost model for calculating High Cost support in exchange for meeting defined broadband build-out obligations. Carriers that elected this option receive predictable monthly payments based on support of up to \$200 for each funded location over the program’s 10-year support term (2017-2026). (Carriers electing ACAM II support receive transition payments if their ACAM II support is less than their 2018 legacy support.) Participating carriers must meet annual deployment milestones starting in year four, 2022.

Connect America Cost Model (CACM)³ – The Connect America Cost Model, commonly called “CAF Phase II,” provides support to price-cap carriers based on a forward-looking model of the cost of constructing modern networks for deploying voice and broadband services in states with unserved areas. This is a six-year fund that began in 2015 when the FCC awarded 10 telecommunications carriers over \$1.5 billion in annual support to build voice- and broadband-capable infrastructure in their areas.

¹ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/acam/> (last visited Aug. 29, 2021).

² All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/acam-ii/> (last visited Aug. 29, 2021).

³ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-phase-ii/> (last visited Aug. 29, 2021).

OAG Attachment B

Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2020

Deployment Requirements

In order to receive CAF II funding, carriers must offer at least one voice and one broadband service commercially. These services must meet the relevant service requirements and go to the required number of locations.

Carriers must complete:

- 40 % of deployments by the end of year 3
- 60 % of deployments by the end of year 4
- 80 % of deployments by the end of year 5
- 100 % of deployments by the end of year 6

Connect America Fund Phase II Auction (CAF II Auction)⁴ - Connect America Fund (CAF) Phase II Auction, commonly called “CAF II Auction,” provides support to carriers to deliver service in areas where the incumbent price cap carrier did not accept CAF Phase II model-based funding and in extremely high-cost areas located within the service areas of the incumbent price cap carriers. After a reverse auction bidding process (Auction 903) completed in 2018, the FCC awarded a total of \$1.49 billion over 10 years to more than 100 winning bidders to provide fixed broadband and voice services to over 700,000 locations in 45 states.

Deployment Requirements

In order to receive CAF II Auction funding, carriers must offer at least one stand-alone voice service plan and one plan that provides broadband service commercially. These services must meet the relevant service requirements to the requisite number of locations.

Carriers must complete:

- 40 % of deployments by the end of year 3
- 60 % of deployments by the end of year 4
- 80 % of deployments by the end of year 5
- 100 % of deployments by the end of year 6

Connect America Fund Broadband Loop Support (BLS)⁵ – Connect America Fund Broadband Loop Support (CAF-BLS) provides support for voice and broadband service, including stand-alone broadband. The fund, a reform of Interstate Common Line Support (ICLS), helps carriers recover the difference between loop costs associated with providing voice and/or broadband service and consumer loop revenues. In 2018, the FCC set a budget of \$1.42 billion for CAF-BLS, which will rise annually with inflation, and reduced the monthly per-line limit on support from \$250 to \$225 as of July 2019 and \$200 as of July 2021. The 2018 order also establishes new deployment obligations for carriers remaining on CAF-BLS support, requiring them to expand deployment of broadband at speeds of 25/3 Mbps by 2024.

⁴ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-phase-ii-auction/> (last visited Aug. 29, 2021).

⁵ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/caf-broadband-loop-support/> (last visited Aug. 29, 2021).

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Description of High Cost Program Funds Received By Minnesota ETCs In Calendar Year 2020

Connect America Fund Inter-carrier Compensation (ICC)⁶ - The Inter-carrier Compensation (ICC) Recovery is the component of the Connect America Fund that introduces reforms to the inter-carrier compensation system. ICC Recovery support went into effect in July 2012 and allows incumbent local exchange carriers (ILECs) to charge residential customers an Access Recovery Charge (ARC) on a limited basis. It also allows ILECs to recover charges from certain multiline business customers. If eligible, ILECs may receive additional recovery funds, provided they meet certain broadband service obligations.

Frozen High Cost Support (FHCS)⁷ - With the advent of the Connect American Fund, existing High Cost Program support was frozen at December 2011 levels and additional changes were made to existing programs to transition universal service from focusing on voice networks to supporting and expanding broadband availability. Price cap carriers and their rate-of-return affiliates, CETCs, and rate-of-return carriers are eligible for frozen support if they were receiving High Cost Program support as of December 2011.

High Cost Loop Support (HCL)⁸ - High Cost Loop (HCL) support is available to rural price-cap and rate-of-return incumbent carriers and competitive carriers providing service in the areas of these rural companies, which must be designated as ETCs. HCL provides support for the last mile of connection for rural companies in service areas where the cost to provide this service exceeds 115 percent of the national average cost per line. ROR carriers have updated limits on capital and operating costs for HCL support and updated corporate operating expense limits for HCL support as well as ICLS.

Rural Broadband Experiment (RBE)⁹ - The Rural Broadband Experiments (RBE) provides funding for experiments in price-cap areas to bring robust, scalable broadband networks to residential and small business locations in rural communities.

⁶ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/icc-recovery/> (last visited Aug. 29, 2021).

⁷ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/frozen-high-cost-support/> (last visited Aug. 29, 2021).

⁸ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/high-cost-loop/> (last visited Aug. 29, 2021).

⁹ All information for this section adopted verbatim or adapted from the USAC Website at <https://www.usac.org/high-cost/funds/rural-broadband-experiments/> (last visited Aug. 29, 2021).



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Minnesota Attorney General Keith Ellison
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August 31, 2021

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

Re: *In the Matter of the Annual Certifications Related to Eligible Telecommunications Carriers' (ETC) Use of Federal Universal Service Support*
Docket No. P-999/PR-21-8

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Kristin Berkland**

KRISTIN BERKLAND

Assistant Attorney General

(651) 757-1236 (Voice)

(651) 296-9663 (Fax)

kristin.berkland@ag.state.mn.us

CERTIFICATE OF SERVICE

Re: *In the Matter of the Annual Certifications Related to Eligible Telecommunications Carriers' (ETC) Use of Federal Universal Service Support*
Docket No. P-999/PR-21-8

I, JUDY SIGAL, hereby certify that on the 31st day of August 2021, I e-filed with eDockets *Comments of the Minnesota Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Issa	Asad	reg@qinkwireless.com	Q Link Wireless LLC	499 E Sheridan St Ste 400 Dania Beach, FL 33004	Electronic Service	No	OFF_SL_21-8_PR-21-8
Sam	Bailey	Sam.Bailey@iwirelesshom e.com	i-Wireless	1 Levee Way Ste 3116 Newport, KY 41071	Electronic Service	No	OFF_SL_21-8_PR-21-8
Tracy	Bandemer	Tracy.Bandemer@itccoop. com	Interstate Telecommunications Cooperative, Inc..	312 4th St W PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-8_PR-21-8
Dianne	Barthel	dianne.barthel@lumen.com	Centurylink Communications, LLC	200 S 5th St Rm 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-8_PR-21-8
James	Beattie	jbeattie@bevcomm.com	Rural Communications Holding Corp.	123 W 7th Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kevin	Becker	kmbeck@wiktel.com	Wikstrom Telephone Company	21307 220th St Greenbush, MN 56726	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kevin	Beyer	kbayer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kevin	Beyer	farmers@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56221	Electronic Service	No	OFF_SL_21-8_PR-21-8
David	Bickett	dave.bickett@parkregion.c om	Otter Tail Telecom	PO Box 277 100 Main St Underwood, MN 56586	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-8_PR-21-8
Karl	Blake	kblake@polartel.com	Polar Communications Mutual Aid Corp.	PO Box 270 110 Fourth Street East Park River, ND 58270	Electronic Service	No	OFF_SL_21-8_PR-21-8
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-8_PR-21-8
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-8_PR-21-8
Chad	Bullock	chadb@wcta.net	West Central Telephone Association	308 Frontage Road PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_21-8_PR-21-8
Thomas	Burns	tgburns@otcpas.com	OLSEN THIELEN & CO. LTD	2675 Long Lake Rd Saint Paul, MN 55113	Electronic Service	No	OFF_SL_21-8_PR-21-8
Danny	Busche	dannybusche@live.com	Winthrop Telephone Company	318 2nd Ave E PO Box 310 Franklin, MN 55333-0310	Electronic Service	No	OFF_SL_21-8_PR-21-8
Thomas	Campbell	tcampbell@otcpas.com	Olsen Thielen	2675 Long Lake Road St. Paul, MN 55309	Electronic Service	No	OFF_SL_21-8_PR-21-8
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.	P.O. Box 920 312 Fourth Street Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-8_PR-21-8
Andrew	Carlson	acarlson@taftlaw.com	Taft Stettinius & Hollister LLP	Suite 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Carpenter	jim.carpenter@telrite.com	Telrite Corporation	1110 Alcovy Rd Covington, GA 30014	Electronic Service	No	OFF_SL_21-8_PR-21-8
Danyell	Carroll	danyell.carroll@windstream.com	Talk America, LLC	4001 N Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_21-8_PR-21-8
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-8_PR-21-8
Teresa	Crews	tcrows@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	Suite 100 1831 Anne Street Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-8_PR-21-8
Angie	Dickson	angie.dickson@state.mn.us	MN DEED	332 Minnesota St E200 MN DEED St Paul, MN 55101	Electronic Service	No	OFF_SL_21-8_PR-21-8
Donna	Eul	Donna.Eul@Aciracoop.net	Federated Telephone	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_21-8_PR-21-8
Donna	Eul	mnpucnotices@farmerstel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212	Electronic Service	No	OFF_SL_21-8_PR-21-8
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_21-8_PR-21-8
Steven	Fenker	stfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd Columbus, OH 43231-5931	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kari	Flanagan	karlf@alliance.coop	Alliance Communications Cooperative, Inc.	P.O. Box 349 612 East 3rd Garretson, SD 57030	Electronic Service	No	OFF_SL_21-8_PR-21-8
Shari	Flanders	sflanders@polartel.com	Polar Communications	PO Box 270 Park River, ND 58270	Electronic Service	No	OFF_SL_21-8_PR-21-8
Travis	Floyd	travisf@wcta.net	West Central Telephone Assoc	308 Frontage Rd PO Box 304 Sebeka, MN 56477	Electronic Service	No	OFF_SL_21-8_PR-21-8
Mark	Forseth	markforseth@rvv.net	Halstad Telephone Company	Box 55 345 2nd Ave West Halstad, MN 56548	Electronic Service	No	OFF_SL_21-8_PR-21-8
Julie	Geerdes	jgeerdes@paulbunyan.net	Paul Bunyan Rural Telephone Coop	1831 Anne St. NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-8_PR-21-8
Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Assoc	PO Box 304 308 Frontage Rd Sebeka, MN 56477	Electronic Service	No	OFF_SL_21-8_PR-21-8
William	Haas	william.haas@t-mobile.com	T-Mobile US	P.O. Box 10076 Cedar Rapids, IA 52410	Electronic Service	No	OFF_SL_21-8_PR-21-8
Roxi	Hacker	roxih@interstatetelcom.com	Interstate Telcom Consulting	130 Birch Avenue West Hector, Minnesota 55342	Electronic Service	No	OFF_SL_21-8_PR-21-8
Bruce	Hanson	bruce@hcinet.net	Sacred Heart Telephone Co.	1104 19th Ave SW Ste B Willmar, MN 56201	Electronic Service	No	OFF_SL_21-8_PR-21-8
Corey	Hauer	coreyhauer@gmail.com	LTD Broadband LLC	69 Teahouse St Las Vegas, NV 89138	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kim	Haugen	info@lismoretele.com	Lismore Coop Telephone Co.	230 S. 3rd Ave PO Box 127 Lismore, MN 56155	Electronic Service	No	OFF_SL_21-8_PR-21-8
Donna	Heaston	Donna.Heaston@Allstream.com	Electric Lightwave, LLC (New)	dba Allstream 2800 Campus Dr Ste 140 Plymouth, MN 55441	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kent	Hedstrom	kent@tunestone.net	Runestone Telephone Association	PO Box 336 100 Runestone Dr Hoffman, MN 56339-0336	Electronic Service	No	OFF_SL_21-8_PR-21-8
Bruce	Hegge	manager@springgrove.coop	Spring Grove Communications	PO Box 516 166 W Main St Spring Grove, MN 55974	Electronic Service	No	OFF_SL_21-8_PR-21-8
Pauleen	Hinkley	phinkley@rvv.net	Halstad Telephone Company	345 2nd Ave W PO Box 55 Halstad, MN 56548	Electronic Service	No	OFF_SL_21-8_PR-21-8
Cory	Hoerler	choerler@mhtele.com	Manchester Heartland	204 Railroad St Manchester, MN 56007-5012	Electronic Service	No	OFF_SL_21-8_PR-21-8
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-8_PR-21-8
Dwayne	Johnson	jtcbusiness@jtc-co.net	Johnson Telephone Co.	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_21-8_PR-21-8
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-8_PR-21-8
Conrad	Johnson	jtcconrad@jtc-co.net	Johnson Telephone Company	205 1st Ave NE PO Box 39 Remer, MN 56672-0039	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	OFF_SL_21-8_PR-21-8
Carrie	Kern Taggart	cak@wiktel.com	Wikstrom Telephone Company Inc	212 South Main PO Box 217 Karlstad, MN 56732	Electronic Service	No	OFF_SL_21-8_PR-21-8
Randy	Kiesel	randy.kiesel@metroneinc.com	Metro FiberNet LLC d/b/a MetroNet	3701 Communications Way Evansville, IN 47715	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthon, MN 56170	Electronic Service	No	OFF_SL_21-8_PR-21-8
Pat	Knutson	pat.knutson@aciracoop.net	Farmers Mutual Telephone Company	PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_21-8_PR-21-8
Patricia	Knutson	in.another.account.Pat.Knutson@Aciracoop.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Paper Service	No	OFF_SL_21-8_PR-21-8
Julie	Kolka	juliekolka@mabeltel.coop	Mabel Cooperative Telephone Company	PO Box 368 214 N Main St Mabel, MN 55954-0368	Electronic Service	No	OFF_SL_21-8_PR-21-8
John	Kroger	johnkroger@wctatel.com	Winnebago Cooperative Telecom Assn.	704 E. Main Street Lake Mills, IA 50450	Electronic Service	No	OFF_SL_21-8_PR-21-8
Tom	Lorenz	Tom.Lorenz@Aciracoop.net	Federated Telephone Cooperative	405 2nd St. E. PO Box 156 Chokio, MN 56221	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Al	Lundeen	alundeen@wiktel.com	Wikstrom Telephone Company	212 S Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-8_PR-21-8
Patrick J	Mastel	pat.mastel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-8_PR-21-8
Cassandra	Milligan	cassandra.milligan@tagmobile.com	TAG Mobile, LLC	701 E Plano Pkwy Ste 408 Plano, TX 75074	Electronic Service	No	OFF_SL_21-8_PR-21-8
Monty	Morrow	montymorrow@nuvera.net	Nuvera	235 Franklin St Hutchinson, MN 55350	Electronic Service	No	OFF_SL_21-8_PR-21-8
Steve	Mueller	steve.mueller@gvtel.net	Garden Valley Telephone Company	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-8_PR-21-8
Melanie	Nelson	mdnelson@rv.net	Halstad Telephone Company	PO Box 55 345 2nd Ave W Halstad, MN 56548-0055	Electronic Service	No	OFF_SL_21-8_PR-21-8
Josh	Netland	jnetland@emily.net	Emily Cooperative Telephone Company	PO Box 100 40040 State Hwy 6 Emily, MN 564470100	Electronic Service	No	OFF_SL_21-8_PR-21-8
Jeffrey J.	Olson	jeffolson@rrt.net	Red River Rural Telephone Association	506 Broadway PO Box 136 Abercrombie, ND 58001-0136	Electronic Service	No	OFF_SL_21-8_PR-21-8
Chris	Olson	wcphone@wcta.net	West Central Telephone Assoc.	P.O. Box 304 308 Frontage Road Sebeke, MN 56477	Electronic Service	No	OFF_SL_21-8_PR-21-8
Paul	Paco Erickson	paco_erickson@mml.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michelle	Painter	michelle.painter@sprint.com	Virgin Mobile USA, L.P.	12502 Sunrise Valley Dr Reston, VA 20196	Electronic Service	No	OFF_SL_21-8_PR-21-8
Jean	Pauk	jean.pauk@tdstelecom.com	TDS Telecom	525 Junction Road Madison, WI 53717	Electronic Service	No	OFF_SL_21-8_PR-21-8
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_21-8_PR-21-8
Ren	Preheim	ren.preheim@itccoop.com	Interstate Telecommunications Coop., Inc.	312 4th Street West Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kristi	Putnam	kristi.putnam@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kris	Rademacher	krisr@farmerstel.net	Farmers Mutual Telephone Co.	301 2nd St S Bellingham, MN 562120369	Electronic Service	No	OFF_SL_21-8_PR-21-8
Brian	Rathman	brian.rathman@telrite.com	Telrite Corporation	2300 Windy Ridge Pkwy Ste 350S Atlanta, GA 30339	Electronic Service	No	OFF_SL_21-8_PR-21-8
Julia	Redman Carter	jrcarter@readywireless.com	Boomerang Wireless LLC	955 Kacena Rd Ste A Hiawatha, IA 52233	Electronic Service	No	OFF_SL_21-8_PR-21-8
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 5510212131	Electronic Service	Yes	OFF_SL_21-8_PR-21-8
Mark	Roach	mark@gocdc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cheryl	Scapanski	cscapanski@bctelco.net	Benton Cooperative Telephone Company	2220 125th St NW Rice, MN 56367	Electronic Service	No	OFF_SL_21-8_PR-21-8
David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-8_PR-21-8
Julie	Serbus	jserbus@mnval.net	Minnesota Valley Telephone Company	PO Box 310 340 2nd Ave E Franklin, MN 55333	Electronic Service	No	OFF_SL_21-8_PR-21-8
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-8_PR-21-8
Ryan	Severson	rseverson@roseauelectric.com	Roseau Electric Coop., Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_21-8_PR-21-8
Bonnie	Simon	bsimon@lonsdaletel.com	Lonsdale Telephone Company	PO Box 358 Lonsdale, MN 55046-0358	Electronic Service	No	OFF_SL_21-8_PR-21-8
Greg	Springer	greg@godtc.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kimberly	Starr	kim@kclenterprises.net	Dunnell Telephone Company	PO Box 728 Judson, Texas 75660	Electronic Service	No	OFF_SL_21-8_PR-21-8
Tracey	Stoll	tsoll@roseauelectric.com	Roseau Electric Cooperative, Inc.	1107 3rd St NE PO Box 100 Roseau, MN 56751-1326	Electronic Service	No	OFF_SL_21-8_PR-21-8
Cynthia	Sweet	csweet@acentek.net	Ace Telephone Association	PO Box 360 207 East Cedar Houston, MN 559430360	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Guy	Swenson	gswenson@bvillemn.net	Barnesville Municipal Telephone Company	PO Box 550 101 Front St S Barnesville, MN 56514	Electronic Service	No	OFF_SL_21-8_PR-21-8
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	OFF_SL_21-8_PR-21-8
Beth	Tollefson	btollefson@kmtel.com	Kasson & Mantorville	18 2nd Avenue NW Kasson, MN 55944	Electronic Service	No	OFF_SL_21-8_PR-21-8
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-8_PR-21-8
Melissa	Tschida	mitschida@sytekcom.com	Upsala Cooperative Telephone	PO Box 277 Upsala, MN 56384	Electronic Service	No	OFF_SL_21-8_PR-21-8
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kalsie	Vanasse	kalsiev@paulbunyan.net	Paul Bunyan Rural Telephone Coop	1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-8_PR-21-8
Amy	Vick	amy.vick@itccoop.com	Interstate Telecommunications Coop., Inc.	312 4th St. W. PO Box 920 Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-8_PR-21-8
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-8_PR-21-8
Lyle	Waughtal	lyle.waughtal@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_21-8_PR-21-8

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Wegscheid	markw@broadband-mn.com	Broadband Corp.	1772 Steiger Lake Ln Victoria, MN 55386	Electronic Service	No	OFF_SL_21-8_PR-21-8
Diane	Wells	diane.wells@state.mn.us	DEED	1st National Bank Bldg 322 Minnesota St #E200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-8_PR-21-8
Kristi	Westbrook	Kristi@gocctc.com	Consolidated Telephone Company	1102 Madison St PO Box 972 Brainerd, MN 56401-0972	Electronic Service	No	OFF_SL_21-8_PR-21-8
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-8_PR-21-8
Anthony	Will	anthonyw@broadband-mn.com	Broadband Corp	585 Hwy 7 W Hutchinson, MN 55350	Electronic Service	No	OFF_SL_21-8_PR-21-8
David	Wolf	dwolf@gardonville.net	Gardonville Cooperative Telephone Association	800 Central Ave N Brandon, MN 56315	Electronic Service	No	OFF_SL_21-8_PR-21-8
Shane	Young	office@northern.tel	Northern Telephone Company	13448 County Road 25 Wawina, MN 55736	Electronic Service	No	OFF_SL_21-8_PR-21-8