

September 1, 2021

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket No. P999/PR-21-8

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

Annual Certifications Related to Eligible Telecommunications Carriers' (ETCs) Use of Federal Universal Service Support.

Sincerely,

/s/ JOY GULLIKSON
Telecommunications Analyst

/s/ DIANE DIETZ
Telecommunications Analyst

JG/DD/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

ETC RECERTIFICATION

P999/PR-21-8

I. INTRODUCTION

Each year, the Minnesota Public Utilities Commission (Commission) must recertify that Eligible Telecommunications Carriers (ETCs) receiving high-cost Funds are using the funds received in the preceding calendar year, and in the coming calendar year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.¹

In 2020, the Federal Communications Commission (FCC) authorized, and the Universal Service Administrative Company (USAC) distributed, \$248,056,604 to Minnesota ETCs to mitigate high costs in the provision of voice and broadband services. Under several of the high-cost schemes, companies must build out broadband networks to a number of locations in given census blocks.² Each year, through the required filing of FCC Form 481, companies receiving high-cost funds³ report certain information, including an affidavit that the company meets certain FCC requirements. The Minnesota Commission requires each company seeking certification to include a separate affidavit from a company officer confirming that funds are used appropriately.

This year, the list of companies generated by USAC, that are eligible for recertification to receive high-cost funds, includes several carriers that are wireless Lifeline only carriers, not needing recertification. There are also two carriers: Lake County and T-Mobile Central, that have relinquished their ETC status, and should not be recertified. Department staff have communicated with USAC concerning the list of companies eligible for recertification and USAC has indicated that the correction cannot be made in the system for this round of recertification.

There are also a number of companies that filed 481 forms that did not receive high-cost funds in 2020, but are due to receive RDOF funds in 2021 and beyond. These companies are not on the USAC list, and although 481 forms were filed, the Department does not believe that these companies require recertification. However, if any company not on USAC list seeks recertification, or if the Commission

¹ 47 CFR § 54.314 (a).

² Several of the funds pay out over a period of years and require that the carrier provision service to a percentage of the eligible locations for each of the years that the fund pays out.

³ Companies certified as ETCs providing Lifeline only are required to file abbreviated versions of FCC Form 481, however, states do not annually recertify these Lifeline only providers.

otherwise chooses to recertify any company not on the USAC list, the PUC can send a letter to USAC, as it did last year for Farmers Cooperative.⁴

All companies on USAC's list as eligible for recertification to receive high cost funds (as of August 23, 2021) are shown in Appendix A, along with the Department's recommendations on whether or not the Commission should recertify the company for receipt of high cost funds. If the recommendation is to not recertify, the reason is provided, such as the company is not a high cost fund recipient.

II. RELEVANT HISTORICAL BACKGROUND

A. FEDERAL LAW AND RULES

Section 254(e) of the Telecommunications Act of 1996 provides that a carrier that receives universal service support must use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. This requirement is also contained in 47 C.F.R § 54.314.

The oversight of ETCs is a joint federal-state effort. Federal support funds for Universal Service are made available through the FCC and are subject to FCC rules. However, States provide the initial certification of and subsequent recertification of ETCs through the Communications Act of 1934, as amended:

47 U.S.C. § 214 (e) (2) states:

Designation of eligible telecommunications carriers. A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1)⁵ as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone

⁴ The certification process is performed by Commission staff via the USAC website, for those companies that USAC has listed as eligible for recertification to receive high cost funds.

⁵ Paragraph (1) states: A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received— § 214 TITLE 47—TELECOMMUNICATIONS Page 50 (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the charges therefor using media of general distribution.

company, the State commission shall find that the designation is in the public interest.

Further, States may enact regulations in addition to the FCC's regulations. 47 U.S.C. § 254 (f) states:

A State may adopt regulations not inconsistent with the Commission's rules to preserve and advance universal service.

Thus, in 47 U.S.C. § 254 (f), Congress expressly permits States to take action to preserve and advance universal service, so long as not inconsistent with the Commission's universal service rules. The federal statute permits States to adopt additional regulations to preserve and advance universal service so long as they also adopt state mechanisms to support those additional substantive requirements. Whether or not providers act under the auspices of a State issued Certificate of Authority, or receive their ability to provide service under an ETC designation alone, State commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the statute and our implementing regulations, so long as those additional reporting requirements do not create burdens that thwart achievement of the universal service reforms set forth in this Order.

The FCC recognized the authority of States to enact regulations in its November 18, 2011 Order, FCC 11-161:

The statute permits states to adopt additional regulations to preserve and advance universal service so long as they also adopt state mechanisms to support those additional substantive requirements. Consistent with this federal framework, state commissions may require the submission of additional information that they believe is necessary to ensure that ETCs are using support consistent with the statute and our implementing regulations, so long as those additional reporting requirements do not create burdens that thwart achievement of the universal service reforms set forth in this Order.

In more recent Orders, the FCC again recognized the role of the States as "primarily responsible for designating ETCs."^{6, 7}

⁶ See FCC *Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking*. FCC 19-111, released November 14, 2019 para 28.

⁷ See FCC Order designating 56 carriers as ETCs where the carrier is not subject to the State Commission's jurisdiction, WC Docket No 09-197 and 10-90, released June 8, 2021, para.4, explaining the limitations on when the FCC grants ETC designations.

47 C.F.R. §54.313 outlines the annual reporting requirements for high-cost funding recipients. Among other requirements, each company or holding company shall certify:

- The carrier is able to function in emergency situations, per §54.202(a)(2).
- The carrier's voice service rate is no more than two standard deviations above the applicable national average urban rate for voice service (\$54.75).⁸
- Pricing of broadband service that meets the FCC's public interest obligations is no more than the applicable benchmark to be announced annually.⁹
- Holding company and operating company identification, and any branding.
- To the extent the recipient serves Tribal lands, documents or information demonstrating 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;
 - Marketing 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 Wireline Competition Bureau.¹⁰

47 C.F.R §54.314, titled "Certification of Support for Eligible Telecommunications Carriers," provides:

- (a) **Certification.** States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to this section.

⁸ See Public Notice, Wireline Competition Bureau And Office Of Economics And Analytics Announce Results Of 2021 Urban Rate Survey For Fixed Voice And Broadband Services, Posting Of Survey Data And Explanatory Notes, And Required Minimum Usage Allowance For Eligible Telecommunications Carriers, DA 20-1409. Released November 30, 2021.

⁹ Id . <https://docs.fcc.gov/public/attachments/DA-20-1409A1.pdf>

¹⁰ The network performance test methodology is behind schedule, and the FCC delayed this requirement.

47 C.F.R §54.405, titled “Carrier Obligations to Offer Lifeline,” provides:

All eligible telecommunications carriers must:

- (a) Make available Lifeline service, as defined in §54.401, to qualifying low-income consumers.
- (b) Publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.
- (c) Indicate on all materials describing the service, using easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. For the purposes of this section, the term “materials describing the service” includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms.
- (d) Disclose the name of the eligible telecommunications carrier on all materials describing the service.

B. APPLICABLE ORDERS AND NOTICES OF THE FEDERAL COMMUNICATIONS COMMISSION AND MINNESOTA PUBLIC UTILITIES COMMISSION

On November 18, 2011, the FCC released its Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Connect America, et al. in WC Dockets No. 10-90, 07-135, 03-109, and 10-208, GN Docket No. 09-51, CC Dockets 09-92 and 96-45, and WT Docket No 10-208, which comprehensively reformed universal service and intercarrier compensation mechanisms. (Connect America Fund – Intercarrier Compensation Order or CAF-ICC Order). Among other things, the CAF-ICC Order addressed annual Section 254(e) certification by states (with respect to the ETCs they have designated). The FCC extended its current reporting requirements (previously codified in 47 C.F.R. §54.209) to all ETCs and codified the reporting requirements in new section 54.313 of its rules. On April 11, 2014, in Docket No. P999/PR-14-08, the Minnesota Commission issued an Order modifying the schedule for future annual certifications as follows:

July 1	Deadline for ETCs to file petitions and supporting documentation, including the information required by FCC Form 481.
September 1	Deadline for comments by the Department, OAG, and other interested persons.
September 8	Deadline for replies.

On July 7, 2017, for implementation in the July 1, 2018 and future 481 filings, the FCC released an Order simplifying annual reporting requirements for ETCs receiving high-cost support. These changes eliminated the following information that was being collected: 1) network outage information; 2) unfulfilled service requests; 3) number of complaints per 1,000 subscribers for voice and broadband

services; 4) voice and broadband service rates; and 5) the requirement for ETCs to certify compliance with service quality standards.¹¹ The FCC also ordered that ETCs did not have to file directly with the state commissions, but the reports are available for states to download from the USAC website.

On October 24, 2018, the Minnesota Commission issued its Order in Docket P999/PR-18-8 requiring that, in future filings, an officer of each company subject to state certification file an affidavit with the Commission concurrently with the FCC Form 481 filing. The affidavit must include:

- a. The position of the affiant.
- b. That the affiant understands and is familiar with the requirements of the FCC concerning universal service funding.
- c. That the funds are and will be used appropriately.
- d. That the company is compliant with applicable rules on service quality and consumer protection.
- e. 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.

As part of the 2019 ETC certification process, the Minnesota Commission ordered: “[b]eginning in 2020, companies must electronically file with the Commission their FCC Form 481 filings under 47 C.F.R. 54.313, along with the affidavit required in Docket No. P-999/PR-18-8.” The submission of the Form 481 filings in eDockets makes them part of the record, upon which the Commission can rely for its decisions.

2019 marked the first year that some companies were awarded high-cost funds from the FCC. Broadband Corporation (SAC¹² 369043) received \$14,271, Jaguar Communications (SAC 369038) received \$25,529, LTD Broadband received \$18,407, and Roseau Electric (SAC 369045) received \$121,437.

In its January 30, 2020 Order, the FCC established the Rural Digital Opportunity Fund (RDOF), a grant program that will provide up to \$20.4 billion over a 10-year period to bring high-speed broadband networks to unserved and underserved areas.¹³ RDOF grants will be distributed in two phases. Phase I will target census blocks that are wholly unserved by fixed voice and broadband with at least 25 megabits-per-second download speed and 3 megabits-per-second upload speed. Phase II will fund unserved locations within partially served census blocks.

¹¹ *Report and Order*. In the Matter of Connect America Fund ETC Annual Reports and Certifications. WC Docket No. 10-90, WC Docket No. 14-58. Released July 7, 2017.

¹² SAC is the Serving Area Code

¹³ See In the Matter of Rural Digital Opportunity Fund, WC Docket No. 19-126, Report and Order, FCC 20-5, ¶ 5 (January 30, 2020) (RDOF Order).

In its December 7, 2020 Notice, the FCC announced the results of auction 904, pertaining to RDOF. The winning bidders included 24 companies selected to receive \$408,150,745.60 to deploy high-speed broadband to 142,841 assigned locations in Minnesota.¹⁴ Winning bidders were required to submit long-form applications to the FCC with more information regarding their qualifications and their plans to use awarded support to meet RDOF obligations.¹⁵ Additionally, by June 7, 2021, a winning bidder was required to certify and provide documentation that it was an eligible telecommunications carrier (ETC) in each area for which it sought support.¹⁶ If the FCC then approved the long-form application, the applicant would be authorized to begin receiving support.

In its May 28, 2021 and June 3, 2021 Orders, the Minnesota Commission approved petitions filed by various carriers petitioning for ETC designation in certain census blocks for the purpose of receiving RDOF grants and required additional compliance filings. In its May 28, 2021 and June 3, 2021 Orders, the Minnesota Commission stated that the petitioning carriers were subject to the Commission's ongoing jurisdiction to oversee ETC compliance as set forth in sections 214(e)(2) and 254(f) of the Federal Communications Act of 1934 as amended, the FCC's universal service rules codified at 47 C.F.R. part 54, and the applicable FCC auction materials.

III. SUMMARY OF HIGH-COST SUPPORT FUNDS

The FCC, through the Universal Access Corporation (USAC),¹⁷ disburses money to companies through 20 different funds. In Minnesota in 2020, USAC disbursed \$248,056,604 from nine different funds. These funds were distributed through the following programs, ranked from most dollars distributed to least (plans with \$0 distributed in Minnesota are excluded from this list).

Plan	Abbrev.	Amount Disbursed in MN in 2020
Connect America Cost Model	CACM	\$85,622,880
Alternative Connect America Model	ACAM	66,216,232
Alternative Connect America Model II	ACAM II	57,149,526
Connect America Fund Inter-carrier Compensation	ICC	18,337,596
Connect America Fund Broadband Loop Support	BLS	10,552,199
High-Cost Loop	HCL	4,620,384
Connect America Fund Phase II Auction	CAF II Auc	3,862,859
Frozen High-Cost Support	FHCS	1,353,132
Rural Broadband Experiment	RBE	<u>341,796</u>
Total		\$248,056,604

¹⁴ See *In the Matter of Rural Digital Opportunity Fund*, WC Docket No. 19-126., Public Notice, Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, DA 20-1422, ¶¶ 17, 36 (December 7, 2020) (Winning Bidder Announcement).

¹⁵ RDOF Order, ¶¶ 86–91.

¹⁶ 47 C.F.R. §§ 54.803(a), 54.804(b)(5).

¹⁷ USAC distributes and manages all the universal service funds mandated by the FCC.

An Explanation of each fund can be found at <https://www.usac.org/high-cost/funds/>

IV. DISCUSSION OF ISSUES

With approximately 60 days available from the time companies submit their Form 481 filings to the time the Department's comments and recommendations are due, it is a challenge to investigate and provide the Commission with assurance that high-cost funds have been, and will be, used for their intended purpose. The Department has found no reason to deny recertification for any ETC, but, as discussed in these comments, there are some areas of concern that merit regulatory oversight. The Department offers comments on the following issues associated with recertification:

- A. Tribal Engagement
- B. Lifeline
- C. SACs not in Minnesota

A. TRIBAL ENGAGEMENT

Companies receiving high cost funds that also serve Tribal areas are required to file documents or information demonstrating that the ETC had discussions with Tribal governments that, at a minimum, include[d]:

- (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- (ii) Feasibility and sustainability planning;
- (iii) Marketing services in a culturally sensitive manner;
- (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- (v) Compliance with Tribal business and licensing requirements. Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services to the Tribes, Tribal members, or Tribal lands. These include certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government licensure.^{18,19}

¹⁸ 47 C.F.R. 54.313 (a)(5).

¹⁹ For further discussion on Tribal Engagement, see: CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU SEEKS COMMENT ON EFFECTIVENESS OF ITS TRIBAL ENGAGEMENT GUIDANCE AND TO REFRESH THE RECORD ON RELATED PETITIONS FOR RECONSIDERATION, FCC Public Notice, WC Docket No. 10-90, October 21, 2019.

<https://docs.fcc.gov/public/attachments/DA-19-1055A1.pdf>

Last year, in Docket 20-8, the Commission noted in its Order:

Any ETC that serves tribal lands must demonstrate in its annual reporting that it has discussed with tribal governments certain subjects designated in 47 C.F.R. § 54.313(a)(5). In its 2019 ETC certification docket, the Commission directed ETCs to cooperate with the Department, tribes, and the Commission to comply with tribal engagement requirements. To that end, in early 2020, the Commission and the Department worked with the Minnesota Telecom Alliance to encourage meaningful engagement between telecommunications carriers and tribes. However, planned meetings between telecommunications carriers and tribes were postponed due to the COVID-19 pandemic. At the September 17, 2020 Commission meeting, the Minnesota Telecom Alliance noted that discussions with tribal leaders had resumed. The Commission will require ETCs serving tribal lands **to continue cooperating with the Commission and the Department in furtherance of meaningful tribal engagement** *emphasis added*.²⁰

To facilitate the ETCs efforts in meaningful Tribal engagement, the Department hosted a virtual meeting with ETCs on April 6, 2021. This meeting followed an email request from the Department to the ETCs to update the companies' engagement efforts. As a result of the email and meeting, the Department worked specifically with some companies to assist them with making respectful, meaningful engagement.

In its Notice of May 25, 2021, in the current Docket, the Commission required ETCs to:

Provide a narrative on how Tribal engagement requirements were met, as defined by 47 C.F.R. § 54.313(d)(5) and the instructions on the FCC Form 481, including outcomes of those efforts. If the ETC has not been successful at meeting engagement requirements, **it shall file a record of all correspondence that documents multiple efforts at outreach**. If the ETC was not successful with Tribal engagement in 2020, the ETC must explain what steps are being taken in 2021 to be successful *emphasis added*.

Fourteen ETCs that received high-cost funds in 2020 serve Tribal Lands. Only one company, Scott-Rice (Integra), out of the 14 companies serving Tribal lands, responded to whether it had discussions regarding the specific federal requirements laid out in the Form 481 form:

- (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- (ii) Feasibility and sustainability planning;
- (iii) Marketing services in a culturally sensitive manner;

²⁰ Commission Order in Docket No. P999/PR-20-8, p.3

- (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- (v) Compliance with Tribal business and licensing requirements. Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services to the Tribes, Tribal members, or Tribal lands. These include certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government licensure.

Although only one company reported on the specific federal requirements, and the May 25, 2021 notice sought to have ETCs provide additional information of future planned engagement if it had not been successful in meeting outreach requirements, no company indicated the lack of success in this regard. Therefore, information on ETCs' future plans to engage with Tribes is limited.

The bar set by the federal government is clear. If progress is to be made in meeting the federal requirements, ETCs must be substantively working on how they can most effectively engage with Tribes. Certainly, if there is no ongoing dialogue or established relationship between the Tribe and the ETC, there is no chance these requirements will be met. Based on their filings, some companies made only minimal efforts at outreach. Other companies, while not responding to all the requirements set out in the Federal rules, clearly made efforts to engage, often with the assistance of the Department's Tribal Liaison. In particular, the Arvig companies showed willingness and made efforts to engage with Tribes after conversations with the Department's Tribal Liaison.

Summaries of the Companies' responses to the requirement for a narrative explaining outreach efforts are listed below. The Department also sought feedback from Tribal Leaders regarding the filings of the ETCs and noted that there was no obligation that the Tribes respond to the Department's request. Where the Department received responses from Tribes, those responses are noted below. Only one company, Scott-Rice (Integra), responded to each of the requirements of in 47 C.F.R. § 54.313(a)(5).

1. Scott Rice—Integra (SAC 361479)

Scott Rice Telephone Company serves the **Shakopee Mdewakanton Sioux Community (SMSC)**. Scott Rice is the only ETC that responded specifically to each of the requirements listed in 47 C.F.R. 54.313 (a)(5). Scott-Rice and the SMSC entered into a fiber agreement in 2015 to provide fiber, Internet, video, and voice services to all community members. The parties are in the process of renegotiating the agreement. Scott Rice states it is in regular contact with the Tribe's leadership, including their Business Council.

SMSC provided feedback to the Department's Tribal Liaison, stating that the Tribe and Scott Rice are in constant communication regarding the Fiber to The Home project.

2. Paul Bunyan Rural Telephone Cooperative (SACs 361451, 366132, and 366133)

Paul Bunyan Rural Telephone Cooperative (PBRTC) serves **Leech Lake Band of Ojibwe (LLBO) and the Red Lake Nation**. For LLBO, PBRTC provided a narrative explaining its customized IT training curriculum and working with tribal education staff as well as area Leech Lake high schools. For the Red Lake Nation, PBRTC describes meeting with tribal leaders as well as the Blandin Foundation to discuss leveraging potential grants with PBRTC's expertise. PBRTC also included a letter to the editor from Kenneth Perrault, District Technology Coordinator for Red Lake Schools, thanking PBRTC for placing wireless access outside all major buildings and some community centers.

3. Arrowhead Communications Corporation (SAC 361374), East Otter Tail Telephone Company (SAC 361385), Callaway Telephone Company (SAC 361365), Twin Valley-Ulen Telephone Company (SAC 361491), and Peoples Telephone Company (SAC 361453)

Arrowhead Communications Corporation and East Otter Tail Telephone Company are both subsidiaries of Arvig, serving the **LLBO**. Callaway and Twin Valley-Ulen Telephone Companies are also subsidiaries of Arvig, serving the **White Earth Band of Ojibwe (White Earth)**. The Peoples Telephone Company, another subsidiary of Arvig, serves **Bois Forte Band of Chippewa (Bois Forte)**. Although off to a slow start, Arvig appears to have made progress with its engagement by meeting in April and May of 2021 with tribal representatives to discuss mapping and drafting broadband grant partnership agreements. More work is anticipated between Arvig and the Department's Tribal Liaison to establish meetings with the White Earth and Bois Forte Tribes. Arvig provided a public service announcement (PSA) on the Emergency Broadband Benefit Program (EBBP) that included information on Tribal eligibility.

4. Johnson Telephone Company (SAC 361410)

Johnson Telephone Company serves **Leech Lake Band of Ojibwe (LLBO)**. Johnson filed a summary of its discussions with the LLBO and has plans to work with the Sugar Point Local Indian Council in 2021, which is within the LLBO Tribal lands.

5. Wikstrom Telephone Company (SAC 361505)

Wikstrom serves the **Red Lake Nation** with phone and internet services. According to Wikstrom, the two parties had conversations in 2020 regarding ongoing telecommunications service needs and priorities. Wikstrom also sent the Red Lake Indian Reservation a letter dated December 17, 2020, memorializing discussions and meetings over the years.

6. Garden Valley Telephone Company (SACs 361395 and 369039)

Garden Valley serves **Red Lake Nation and the White Earth Band of Ojibwe**. According to their filings, Garden Valley has had multiple interactions with White Earth. However, outreach with the Red Lake Nation appears to be sparse – Apart from a letter to the Tribal Chair of Red Lake Nation, Garden Valley provided no information about their interactions with Red Lake.

7. Citizens and Frontier Minnesota (SACs 361123, 367123, 361367)

Citizens and Frontier serve **Bois Forte Band of Chippewa , Fond du Lac Band of Lake Superior Chippewa (Fond du Lac), and Mille Lacs Band of Ojibwe (Mille Lacs)**. Frontier sent an annual letter to Tribal contacts in each Tribe. Although the letter cordially offered an invitation to talk, the letter elicited no response. Frontier sent a follow up email in April of 2021. Frontier heard back only from

Fond du Lac, which is its own ETC, and is engaged in building its own fiber broadband network that is expected to reach about 95 percent of its member locations by end of 2021. Fond du Lac also responded to the Department's request for feedback and reports several conversations between the Tribe and Frontier. Fond du Lac as its own ETC, has not sought additional engagement with Frontier. Based on their filing, Frontier has not established a connection with Boise Forte or Mille Lacs Tribes. Frontier offered no plans for additional outreach efforts for 2021 for Boise Forte and Mille Lacs.

8. CenturyTel of Minnesota (SAC 361445), Embarq Minnesota (SAC 361456), Qwest Corporation (SAC 365142), collectively, CenturyLink.

CenturyLink, through its various companies serves the vast majority of Tribal land in Minnesota, compared to the other companies filing 481s. CenturyTel of Minnesota serves **Bois Forte Band of Ojibwe, Fond du Lac Band of Lake Superior Chippewa, Grand Portage Band of Lake Superior Chippewa, and White Earth Band of Ojibwe**. Embarq serves **Mille Lacs Band of Ojibwe, Prairie Island Indian Community, and the Upper Sioux Community**. Qwest serves **Lower Sioux Indian Community, Bois Forte Band of Chippewa, Leech Lake Band of Ojibwe, Mille Lacs Band of Ojibwe, White Earth Band of Ojibwe, Prairie Island Indian Community, Red Lake Nation and the Shakopee Mdewakanton Sioux Community**.

According to CenturyLink's cover letters for its 481 filings, CenturyLink had discussions with various tribes. CenturyLink's narratives, however, state that the CenturyLink entities did not receive a response to the outreach letters sent in 2020 except for a note that there were several conversations with the LLBO. No additional plans for 2021 were offered. CenturyLink sent an email letter to each Tribe in June of 2020 and a follow up in December of 2020. Each letter bore an appropriate email address for the tribal contact. The letter itself was generic and put the burden of setting up meetings on the Tribe by stating "[t]o request a meeting, please respond to this e-mail with proposed topics, dates and times" The signature block bore only "CenturyLink Tribal Outreach" and a phone number.

Although a representative from CenturyLink participated in the April 6, 2021 meeting between the Commission, the Department, and the ETCs serving Tribal lands, there has been little to no follow up with the Tribes, with the possible exception of the LLBO, despite outreach to CenturyLink by the Department's Tribal Liaison.

DEPARTMENT RECOMMENDATIONS ON TRIBAL ENGAGEMENT

Almost none of the ETCs reported on the specific federal requirements related to Tribal engagement, although some companies clearly are either in dialogue or working with Tribes on specific matters. The Department recognizes that proper Tribal engagement takes time and concerted effort, but the lack of information provided by ETCs on future planned efforts is concerning. Further, the lack of transparency of what companies have done for Tribal engagement in the previous calendar year, until information for recertification is submitted on July 1st of the following year, fails to correct for unsatisfactory Tribal engagement for the past as it is after the fact, and places reliance on company promises for better behavior going forward. In order to ensure that Tribal engagement occurs, in service to meeting the FCC requirements for ETCs, the Department recommends that the Commission order each ETC to:

- 1) Provide a detailed plan on how, in 2021, it will meaningfully and appropriately engage with all the Tribes it serves during the remainder of 2021 and the first half of 2022, within 30 days of the Commission's Order in this matter. The plan should include the company's plan to address the individual reporting requirements in Form 481, provide the name, position, and contact information of the person primarily responsible for Tribal engagement, and identify the ongoing duties that person will have with respect to Tribal engagement.
- 2) Provide quarterly reports to memorialize the ongoing efforts of each of the companies that serve Tribal lands. Since the ETC recertification filings are due on July 1, there may be no need for a separate quarterly report on July 1, if the ETC includes information on the ongoing efforts in its filing. Other quarterly reports may be filed on January 1, April 1, and October 1. The Department notes that this should not be considered an additional burden being placed on the ETCs since Tribal engagement is to be ongoing, but rather documentation of what has transpired, which can then be used by the ETC in the annual recertification process.

If the Commission supports the provision of quarterly reports, it will be the Department's objective to use the reports to facilitate further discussions with the Tribes to ensure they are aware of the ETC's responsibilities and can have appropriate expectations of what should occur with proper Tribal engagement.

B. LIFELINE

The Department reviewed the compliance of ETCs with the federal Lifeline requirements and the Commission order and Notice in Docket 20-747. This section discusses highlights of the Department's findings with respect to Lifeline compliance.

1. Broadband Corporation

In early August 2021, Broadband Corporation added a Lifeline program reference to its website in response to a request from the Department. This website reference includes a Lifeline sub-page along with a link to the sub-page at the bottom of its main page. While the carrier made no reference to Lifeline on line 1220 of its most recent 481 form, the website update was made subsequent to filing its 481 form.

On August 19, 2021, Broadband Corporation filed documentation describing its Lifeline outreach efforts in response to an August 4, 2021 email message from the Department and in compliance with the Commission's August 2, 2021 "Notice of Lifeline Outreach Filing Requirements for High Cost ETCs" in Docket Nos. P999/CI-20-747 and P999/PR-21-8.

The Department believes that the Lifeline references on Broadband Corporation's website and its August 19, 2021 filing comply with the requirements of the applicable federal law. The Department will continue to monitor Broadband Corporation's compliance with the requirements of the Commission's August 2, 2021 "Notice of Lifeline Outreach Filing Requirements."²¹

²¹ Notice of Lifeline Outreach Filing Requirement for High Cost ETCs, Docket Numbers: P999/C-20-747 and P999/PR-21-8, issued August 2, 2021.

2. Jaguar Communications, Inc.

In the November 25, 2020 Order in the matter of the Annual Certification related to Eligible Telecommunications Carriers in Docket No. P999/R-20-8, the Commission directed Jaguar Communications, Inc. (in Ordering paragraph 4) to take the following action:

By January 4, 2021, Jaguar Communications, Inc. shall make a compliance filing in a separate docket describing its Lifeline discount program, the number of recipients, and Jaguar's methods, materials, website, and other means for making customers aware of the Lifeline program.

On January 4, 2021, Jaguar Communications, Inc. (Jaguar) filed a letter requesting "an approximate one-month extension" to file its report given that Jaguar was purchased during the year 2020 and was "undergoing integration with its new owner." The proposed time extension was intended to provide Jaguar with time to allow for the integration of Jaguar's website and informational materials with that of its new affiliates. Jaguar further stated that it would "make its filing as soon as reasonably practicable."

In recent months, the Department has raised concerns with Jaguar Communications, Inc., regarding the fact that Jaguar Communications, Inc. had no website and, therefore, no website reference to the Lifeline program. At the same time, its affiliate operating under the name MetroNet had a website referencing the Lifeline program at the bottom of the main page. In response to the concerns raised by the Department, Jaguar Communications filed a petition to add the assumed name of MetroNet to its certificate of authority on August 9, 2021 in Docket No. P5891/M-21-608.²² On line 1220 of Jaguar's most recent 481 form, the carrier references the link to the lifeline sub-page on the website of metronetinc.com.

On August 4, 2021, the Department sent an email message to Jaguar Communications asking that the carrier submit a filing, within five days, addressing the compliance with the Commission's August 2, 2021 "Notice of Lifeline Outreach Filing Requirements for High Cost ETCs" in Docket Nos. P999/CI-20-747 and P999/PR-21-8. In response to a Department request on August 4, 2021, on August 8, 2021, Jaguar Communications described the Carrier's website, included its annual notice to customers of its Lifeline program and the possibility of pursuing other advertising to comply with the best practices described in the Commission's August 2, 2021 notice.

²² In its August 19, 2021 email message to the Department, Jaguar Communications, Inc. (Jaguar) clarified its relationship with Metro FiberNet, LLC (MFN). The email message stated that, although Jaguar and MFN are affiliates, they operate as separate entities. Both Jaguar and MFN are subsidiaries of MetroNet Holdings, LLC. Both entities operate under the assumed name of "MetroNet." MFN has not been designated as an ETC and, therefore, does not offer Lifeline in Minnesota. Jaguar has been designated as an ETC and offers Lifeline in its serving area. Jaguar currently has one active Lifeline customer who receives Internet, but not voice service. Jaguar does not serve tribal areas.

The Department believes that the Lifeline references on the website of Jaguar Communications, Inc. dba MetroNet complies with the requirements of the applicable federal law. The Department will continue to monitor Jaguar Communication's compliance with the requirements of the Commission's August 2, 2021 "Notice of Lifeline Outreach Filing Requirements."

3. LTD Broadband

In early August 2021, in response to a Department request, LTD Broadband added a website reference to the Lifeline program, accessible through the "phone" tab on the main page of its website. While the carrier made no reference to its Lifeline website link on line 1220 of its 481 form, the recent website change was made subsequent to the filing of its most recent 481 form.

On August 4, 2021, the Department sent an electronic message to LTD Broadband asking that they submit an email message and a filing in in the current docket, within five days, addressing the compliance with the Commission's August 2, 2021 "Notice of Lifeline Outreach Filing Requirements for High Cost ETCs" in Docket Nos. P999/CI-20-747 and P999/PR-21-8. On August 5, 2021, LTD Broadband filed a letter in response making the following statement:

Some of the outreach efforts we have made are posting on our website that we are a Lifeline Service Provider with a live link to the FCC's website. In addition, we made a post on our Facebook page about being a Lifeline Service Provider and will continue to mention that in additional advertising we post on Facebook. We also mailed out postcards with Lifeline information, so people were aware of the opportunity.

The Department believes that the Lifeline references on the website of LTD Broadband comply with the requirements of the applicable federal law. The Department will continue to monitor LTD Broadband's compliance with the requirements of the Commission's August 2, 2021 "Notice of Lifeline Outreach Filing Requirements."

4. Northern Telephone Company of Minnesota and Wilderness Valley Telephone Company, Inc.

Northern Telephone Company of Minnesota and Wilderness Valley Telephone company have no websites. Line 1220, of the most recent 481 forms filed by these carriers, are blank and contain no website address.

On August 4, 2021, the Department sent an electronic message to Northern and Wilderness Valley Telephone Companies asking that they submit filings, within five days, addressing the compliance with the Commission's August 2, 2021 "Notice of Lifeline Outreach Filing Requirements for High Cost ETCs" in Docket Nos. P999/CI-20-747 and P999/PR-21-8. On August 9, 2021, Northern and Wilderness Valley Telephone Companies filed letters describing their Lifeline outreach efforts, stating that their "first priority is to use the high-cost money for what it is intended, to deliver high-speed broadband connections to rural areas. Once customers are able to get on-line with our service, we will investigate a possible website and a social media presence, if these are affordable." The letters include copies of

the annual notice issued to customers and explain that, with so few customers, the 1.5 employees of the two carriers know each customer by name and are continuously interacting with them in the small communities.²³

Given the explanation provided in the August 9, 2021 responses of Northern and Wilderness Valley Telephone Companies, the Department recommends that, at the present time, the Commission take no action regarding the website issue as it relates to these two carriers.

5. Carriers with Miscellaneous Lifeline Reporting Issues

The following carriers left Line 1220 blank on their most recent 481 forms and, thereby, failed to report the links to their website references to the Lifeline program: Ace Telephone Association, Clara City Telephone Exchange, Hills Telephone Company, Inc., Lismore Cooperative Telephone Company, Mid State Telephone Company dba KMP, Minnesota Valley Telephone Company, Roseau Electric Cooperative, Inc., Sacred Heart Telephone Company, Starbuck Telephone Company, Wikstrom Telephone Company, Winthrop Telephone Company, Woodstock Telephone Company, Zumbrota Telephone Company.

The Department has reviewed the websites of all high cost ETCs and has verified that the websites of these carriers reference the Lifeline program. Therefore, the Department is not taking issue with the inadvertent failure of these companies to reference their website links to the Lifeline program on line 1220 of their most recent 481 forms. The Department believes that the Lifeline references on the websites of the carriers complies with the requirements of the applicable federal law. The Department will continue to monitor the compliance, of these carriers, with the requirements of the Commission's August 2, 2021 "Notice of Lifeline Outreach Filing Requirements."

As part of its investigation into the annual certification of ETCs, the Department found that the Lifeline references on the websites of several carriers need updates. These instances are noted in the spreadsheet, Attachment 1.²⁴

The Department recommends that all high cost ETCs be directed to file their Lifeline Outreach Plans, in compliance with the requirements of the Commission's August 2, 2021 Notice of Lifeline Outreach Filing Requirements, if they have not yet done so.

²³ The August 9, 2021 letters filed by the two carriers state that Northern Telephone Company has 32 voice and internet customers with 5 Lifeline subscribers. In its August 9, 2021 letter, Wilderness Valley Telephone Company reports 61 voice and Internet customers (i.e., 39 seasonal and 22 permanent customers) with 1 lifeline subscriber. Shane Young is the owner and president of both carriers and serves as the customer contact for the Lifeline program as well as the trainer for the part-time employee, who, according to Mr. Young, is well versed in the Lifeline program and the Telephone Assistance Plan.

²⁴ The spreadsheet is updated as August 25. The Department understands that companies have been correcting their websites and will follow up as required.

C. SERVING AREA CODES NOT IN MINNESOTA

The following SACs serve Minnesota customers, but are registered in other states and will be certified in those states.

SAC	Carrier Name	Certifying State
391405	Alliance Comm Coop - Hills Tel Coop	South Dakota
391657	Alliance Comm Coop - Splitrock	South Dakota
351126	CenturyTel of Chester	Iowa
330950	CenturyTel of NW Wisconsin	Wisconsin
381630	Polar Comm Mutual Aid Corp	North Dakota
381614	Polar Telecomm	North Dakota
381631	Red River Rural	North Dakota

The Department has confirmed with the Commission Staff in North Dakota, South Dakota, Iowa, and Wisconsin, that the above listed companies will be certified by the Commissions in those states. In the past, the Minnesota Commission has certified these companies and no harm has come from it. The Department recommends not certifying these companies, as shown in Appendix A, but no harm will occur if the Commission chooses to certify these ETCs.

V. COMMISSION ALTERNATIVES

- A. Which High-cost ETCs have adequately satisfied the regulations applicable to ETCs and merit recertification?

Commission options:

1. Recertify all companies as indicated in Appendix A. This includes those companies on the USAC list, and the additional companies that filed Form 481s and require a letter to be sent to the FCC.
2. Recertify select companies.

- B. Tribal outreach: What action shall the Commission take with respect to Tribal Outreach:

1. Order each ETC serving Tribal Lands to:
 - (a) Provide a detailed plan on how, in 2021, it will meaningfully and appropriately engage with all the Tribes it serves during the remainder of 2021 and the first half of 2022, within 30 days of the Commission's Order in this matter. The plan should include the company's plan to address the individual reporting requirements in Form 481, provide the name, position, and contact information of the person primarily responsible for Tribal engagement, and identify the ongoing duties that person will have with respect to Tribal engagement.
 - (b) Provide ongoing quarterly reports to memorialize the efforts of each of the companies that serve Tribal lands. Since the ETC recertification filings are due on July 1, a separate quarterly report on July 1 will not be required if the ETC includes information on the ongoing efforts in its filing. Other quarterly reports are to be filed on January 1, April 1, and October 1.

2. Take no action on company Tribal Engagements efforts.

3. Take other action the Commission deems appropriate.

C. Lifeline

1. Direct all high cost ETCs to file their Lifeline Outreach Plans, in compliance with the requirements of the Commission's August 2, 2021 Notice of Lifeline Outreach Filing Requirements, if they have not yet done so.

2. Take no action regarding Lifeline.

3. Other action the Commission deems appropriate.

VI. DEPARTMENT RECOMMENDATIONS

The Department recommends Commission alternatives A1, B1 (a) (b), C1.

/ar

SAC	Company from USAC List 8-31-21	Status	Certify	Reason for Denial Recommendation
<input checked="" type="checkbox"/>	361346 ACE TEL ASSN-MN	ILEC	yes	
<input type="checkbox"/>	361347 ALBANY MUTUAL ASSN	ILEC	yes	
<input type="checkbox"/>	369012 Alltel Communications, LLC	CETC	no	not a high cost company
<input type="checkbox"/>	369013 Alltel Communications, LLC	CETC	no	not a high cost company
<input type="checkbox"/>	369909 AMERICAN CELLULAR CORPORATION (MN)	CETC	no	not a high cost company
<input type="checkbox"/>	361374 ARROWHEAD COMM CORP	ILEC	yes	
<input type="checkbox"/>	361350 ARVIG TEL CO	ILEC	yes	
<input type="checkbox"/>	361356 BENTON COOP TEL CO	ILEC	yes	
<input type="checkbox"/>	361357 BLACKDUCK TEL CO	ILEC	no	inactive SAC
<input type="checkbox"/>	361358 BLUE EARTH VALLEY	ILEC	yes	
<input type="checkbox"/>	361362 BRIDGEWATER TEL CO	ILEC	yes	
<input type="checkbox"/>	369043 Broadband Corp	CETC	yes	
<input type="checkbox"/>	361365 CALLAWAY TEL CO	ILEC	yes	
<input type="checkbox"/>	361440 CANNON VLY TELECOM	ILEC	yes	
<input type="checkbox"/>	369911 CELLULAR MOBILE SYSTEMS OF ST. CLOUD	CETC	no	not a high cost company
<input type="checkbox"/>	351126 CENTURYTEL-CHESTER	ILEC	not needed	certified by Iowa
<input type="checkbox"/>	361445 CENTURYTEL-MINNESOTA	ILEC	yes	
<input type="checkbox"/>	330950 CENTURYTEL-NW WI	ILEC	not needed	certified by Wisconsin
<input type="checkbox"/>	361425 CHRISTENSEN COMM CO	ILEC	yes	
<input type="checkbox"/>	361123 CITIZENS-FRONTIER-MN	ILEC	yes	
<input type="checkbox"/>	367123 CITIZENS-FRONTIER-MN	ILEC	yes	
<input type="checkbox"/>	361353 CITY OF BARNESVILLE	ILEC	yes	
<input type="checkbox"/>	361370 CLARA CITY TEL EXCH	ILEC	yes	
<input type="checkbox"/>	361372 CLEMENTS TEL CO	ILEC	yes	
<input type="checkbox"/>	361373 CONSOLIDATED TEL CO	ILEC	yes	
<input type="checkbox"/>	369044 Consolidated Telephone Company	CETC	yes	
<input type="checkbox"/>	361499 CROSSLAKE TEL CO	ILEC	yes	
<input type="checkbox"/>	361381 DUNNELL TEL CO	ILEC	yes	
<input type="checkbox"/>	361383 EAGLE VALLEY TEL CO	ILEC	yes	
<input type="checkbox"/>	361385 EAST OTTER TAIL TEL	ILEC	yes	
<input type="checkbox"/>	361384 EASTON TEL CO	ILEC	yes	
<input type="checkbox"/>	361386 ECKLES TEL CO	ILEC	yes	
<input type="checkbox"/>	361456 EMBARQ MINNESOTA	ILEC	yes	not currently a high cost company now, but ok to recertify
<input type="checkbox"/>	361387 EMILY COOP TEL CO	ILEC	yes	
<input type="checkbox"/>	361389 FARMERS MUTUAL TEL	ILEC	yes	
<input type="checkbox"/>	369020 Farmers Mutual Telephone Company	CETC	yes	
<input type="checkbox"/>	361390 FEDERATED TEL COOP	ILEC	yes	
<input type="checkbox"/>	366130 Federated Telephone Cooperative	CETC	yes	
<input type="checkbox"/>	361403 FEDERATED UTILITIES	ILEC	yes	
<input type="checkbox"/>	361391 FELTON TEL CO. INC.	ILEC	yes	
<input type="checkbox"/>	361367 FRONTIER-MINNESOTA	ILEC	yes	
<input type="checkbox"/>	361395 GARDEN VALLEY TEL CO	ILEC	yes	
<input type="checkbox"/>	369039 Garden Valley Telephone Company	CETC	yes	

SAC	Company from USAC List 8-31-21	Status	Certify	Reason for Denial Recommendation
<input type="checkbox"/>	361396 GARDONVILLE COOP TEL	ILEC	yes	
<input type="checkbox"/>	361399 GRANADA TEL CO	ILEC	yes	
<input type="checkbox"/>	361401 HALSTAD TEL CO	ILEC	yes	
<input type="checkbox"/>	369040 Halstad Telephone Company	CETC	yes	
<input type="checkbox"/>	361404 HARMONY TEL. CO.	ILEC	yes	
<input type="checkbox"/>	361405 HILLS TEL CO, INC	ILEC	not needed	certified by South Dakota
<input type="checkbox"/>	391405 HILLS TEL CO-SD	ILEC	not needed	certified by South Dakota
<input type="checkbox"/>	361408 HOME TEL CO - MN	ILEC	yes	
<input type="checkbox"/>				no 481 in files No Lifeline customers No high cost funds 2020
	369003 HOMETOWN SOLUTIONS	CETC	no	
<input type="checkbox"/>	361409 HUTCHINSON TEL CO	ILEC	yes	
<input type="checkbox"/>	361654 INTERSTATE TELECOMM.	ILEC	yes	
<input type="checkbox"/>	369041 Interstate Telecommunications Cooperative, Inc.	CETC	yes	
<input type="checkbox"/>	369038 Jaguar Communication, Inc	CETC	yes	
<input type="checkbox"/>	361410 JOHNSON TEL CO	ILEC	yes	
<input type="checkbox"/>	361412 KASSON & MANTORVILLE	ILEC	yes	
<input type="checkbox"/>	366110 Lake County d/b/a Lake Connections	CETC	no	ETC relinquished in 2019
<input type="checkbox"/>	361419 LISMORE COOP TEL CO	ILEC	yes	
<input type="checkbox"/>	361422 LONSDALE TEL CO	ILEC	yes	
<input type="checkbox"/>	361443 LORETEL SYSTEMS, INC	ILEC	yes	
<input type="checkbox"/>	369047 LTD Broadband LLC	CETC	yes	
<input type="checkbox"/>	361424 MABEL COOP TEL - MN	ILEC	yes	
<input type="checkbox"/>	361426 MANCHESTER-HARTLAND	ILEC	yes	
<input type="checkbox"/>	361427 MANKATO-HICKORYTECH	ILEC	yes	
<input type="checkbox"/>	361430 MELROSE TEL CO	ILEC	yes	
<input type="checkbox"/>	361413 MID STATE DBA KMP	ILEC	yes	
<input type="checkbox"/>	361433 MID STATE TEL CO	ILEC	yes	
<input type="checkbox"/>	361375 MID-COMM-HICKORYTECH	ILEC	yes	
<input type="checkbox"/>	369015 Midcontinent Communications	CETC	yes	
<input type="checkbox"/>	361431 MIDWEST TEL CO	ILEC	yes	
<input type="checkbox"/>	369002 MIDWEST WIRELESS COMMUNICATIONS, LLC	CETC	no	not a high cost company no 481 in system No Lifeline customer. No high cost funds 2020
<input type="checkbox"/>	361437 MINNESOTA LAKE TEL	ILEC	no	
<input type="checkbox"/>	361439 MINNESOTA VALLEY TEL	ILEC	yes	
<input type="checkbox"/>	361442 NEW ULM TELECOM, INC	ILEC	yes	
<input type="checkbox"/>	361500 NORTHERN TEL CO - MN	ILEC	yes	
<input type="checkbox"/>	369008 NPCR, INC.	CETC	no	not a high cost company
<input type="checkbox"/>	361448 OSAKIS TEL CO	ILEC	yes	
<input type="checkbox"/>	361450 PARK REGION MUTUAL	ILEC	yes	
<input type="checkbox"/>	361451 PAUL BUNYAN RURAL	ILEC	yes	
<input type="checkbox"/>	366132 Paul Bunyan Rural Telephone Cooperative	CETC	yes	
<input type="checkbox"/>	366133 Paul Bunyan Rural Telephone Cooperative	CETC	yes	

SAC	Company from USAC List 8-31-21	Status	Certify	Reason for Denial Recommendation
<input type="checkbox"/>	361453 PEOPLES TEL CO - MN	ILEC	yes	
<input type="checkbox"/>	361454 PINE ISLAND TEL CO	ILEC	yes	
<input type="checkbox"/>	381630 POLAR COMM MUT AID	ILEC	not needed	certified by North Dakota
<input type="checkbox"/>	381614 POLAR TELECOMM.	ILEC	not needed	certified by North Dakota
<input type="checkbox"/>	365142 QWEST CORP-MN	ILEC	yes	
<input type="checkbox"/>	369004 RCC MINNESOTA	CETC	no	not a high cost company
<input type="checkbox"/>	369009 RCC Minnesota, Inc. (SMN)	CETC	no	not a high cost company
<input type="checkbox"/>	381631 RED RIVER RURAL TELEPHONE ASSOC.	ILEC	not needed	certified by North Dakota
<input type="checkbox"/>	361472 REDWOOD COUNTY TEL	ILEC	yes	
<input type="checkbox"/>	369045 Roseau Electric Cooperative, Inc.	CETC	yes	
<input type="checkbox"/>	361474 ROTHSA Y TEL CO, INC	ILEC	yes	
<input type="checkbox"/>	361475 RUNESTONE TEL ASSN	ILEC	yes	
<input type="checkbox"/>	361423 Runestone Telephone Association	ILEC	yes	
<input type="checkbox"/>	361476 SACRED HEART TEL CO	ILEC	yes	
<input type="checkbox"/>	361479 SCOTT RICE -INTEGRA	ILEC	yes	
<input type="checkbox"/>	361483 SLEEPY EYE TEL CO	ILEC	yes	
<input type="checkbox"/>	391657 SPLITROCK TELECOM COOPERATIVE INC.	ILEC	yes	
<input type="checkbox"/>	361485 SPRING GROVE COOP	ILEC	yes	
<input type="checkbox"/>	361487 STARBUCK TEL CO	ILEC	yes	
<input type="checkbox"/>				no 481 in system No Lifeline
<input type="checkbox"/>	369007 TEKSTAR COMMUNICATIONS, INC.	CETC	no	customer. No high cost funds 2020
<input type="checkbox"/>	369014 T-Mobile Central LLC	CETC		ETC relinquished
<input type="checkbox"/>	369032 Tracfone Wireless Inc.	CETC	no	not a high cost company
<input type="checkbox"/>	361491 TWIN VALLEY-ULEN TEL	ILEC	yes	
<input type="checkbox"/>	361494 UPSALA COOP TEL ASSN	ILEC	yes	
<input type="checkbox"/>	361495 VALLEY TEL CO - MN	ILEC	yes	
<input type="checkbox"/>	361501 WEST CENTRAL TEL	ILEC	yes	
<input type="checkbox"/>	369042 West Central Telephone Association	CETC	yes	
<input type="checkbox"/>	361502 WESTERN TEL CO	ILEC	yes	
<input type="checkbox"/>	369001 WESTERN WIRELESS	CETC	no	not a high cost company
<input type="checkbox"/>	361505 WIKSTROM TEL CO, INC	ILEC	yes	
<input type="checkbox"/>	369046 Wikstrom Telephone Company	CETC	yes	
<input type="checkbox"/>	361348 WILDERNESS VALLEY	ILEC	yes	
<input type="checkbox"/>	361414 Windstream Communications, Inc.	ILEC	yes	
<input type="checkbox"/>	361482 Windstream Communications, Inc.	ILEC	yes	
<input type="checkbox"/>	361337 WINNEBAGO COOP ASSN	ILEC	yes	
<input type="checkbox"/>	361507 WINSTED TEL CO	ILEC	yes	
<input type="checkbox"/>	361508 WINTHROP TEL CO	ILEC	yes	
<input type="checkbox"/>	369005 WIRELESS ALLIANCE, LLC	CETC	no	not a high cost company
<input type="checkbox"/>	361512 WOLVERTON TEL CO	ILEC	yes	
<input type="checkbox"/>	361510 WOODSTOCK TEL CO	ILEC	yes	
<input type="checkbox"/>	361515 ZUMBROTA TEL CO	ILEC	yes	

SAC	Company from USAC List 8-31-21	Status	Certify	Reason for Denial Recommnedation
	ADDITIONAL FILERS			
369914	Consolidated Tel Co	CLEC	yes	requires letter to FCC
369021	Federated Telephone Company	CLEC	yes	requires letter to FCC
369050	Gardon Valley Telephone Company	CLEC	yes	requires letter to FCC
369049	Paul Bunyan Rural Telephone Cooperative	CLEC	yes	requires letter to FCC
369029	Winnebago Cooperate Association	CLEC	yes	requires letter to FCC

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. P999/PR-21-8

Dated this 31st day of August 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Issa	Asad	reg@qlinkwireless.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@iwirelesshome.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	kbeyer@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	mpucnotices@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.com	Otter Tail Telcom	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	tcrews@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	Dickison	angie.dickison@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	sfenker1@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	karif@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@rrv.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	Grew	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 AvePO 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@runestone.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@rrv.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@metronetinc.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 Ruthton, 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@wikel.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@rrv.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 Sebekka, MN 56477	Electronic Service	No	OFF_SL_21-8_PR-21-8
Paul	Paco Erickson	paco_erickson@mmi.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 551012131	Electronic Service	Yes	OFF_SL_21-8_PR-21-8
Mark	Roach	mark@goctc.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 PI 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@gotc.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	tstoll@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	mtschida@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	Westbrock	Kristi@goctc.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