

September 8, 2021

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place E, Suite 350
St. Paul, MN 55101-2147

Re: Docket No. P999/PR-21-8 Annual Certifications Related to Eligible Telecommunications”
(ETCs) Use of Federal Universal Service Support Reply Comments

Dear Mr. Seuffert:

Olsen Thielen represents numerous service providers that have filed information under Docket 21-8, therefore we provide the following reply comments in response to the Comments of the Minnesota Department of Commerce (DOC) specifically in the following areas:

IV. Discussion Items

A. TRIBAL ENGAGEMENT

The service providers of tribal areas request that additional interaction between the Department of Commerce and Commission Staff be taken before either recommendation of option A1 or A2 requiring additional reporting obligation of service providers above those required within the FCC Form 481 Certification. To date we are unaware of any standing complaints or expressed concern by the tribal areas served of the Federal requirements are not being met. Attendance of meetings facilitated by the DOC and PUC staff was well attended by invited service providers who are more than willing to engage in continued discussions.

C. SERVING AREA CODES NOT IN MINNESOTA

The service providers of SAC Codes 391405, 391657, 381630, 381614, 381631 disagree with the DOC’s recommendation not to certify these companies, even though each service provider will receive a certification from another State Commission, as a service provider within Minnesota the re-certification of their authority in the State of Minnesota (MN) is used to support various applications that include Lifeline, the Emergency Broadband Protection, and various State and Federal Broadband Grant Programs.

We agree with the DOC’s assessment that no harm will occur if the Commission chooses to certify these ETC’s.

APPENDIX A –

Alliance Communications, dba Hills Telephone Company, Inc. SAC 361405 was incorrectly classified as a being certified by the South Dakota Commission, we respectfully request that the MN PUC Certify include this study area code in the active list of service providers within MN. It is correct that the Company also has SAC 391405 that is certified by the South Dakota Commission.

Tekstar Communications, Inc. SAC Code 369007 was identified within Appendix A as “No 481 in System, and no Lifeline Customers”. Tekstar Communications, Inc. as part of its ARVIG Enterprise, Inc. E-filing #20216-175690-04 pages 95-119 provided the MN PUC a copy of the FCC Form 481. In additional we clarify that they serve over 150 lifeline customers within MN. As evidenced by this information we request that Tekstar Communications, Inc. be moved to the Appendix A, additional filers list and receive ETC certification.

We appreciate your consideration in these issues in the following matter.

Please contact the undersigned if you need further information.

Sincerely,

/s/ Tom Campbell

Tom Campbell
Telecommunications Consultant
tcampbell@otcpas.com
Enclosures