# STATE OF MINNESOTA BEFORE THE PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger Chair

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In the Matter of the Petition of CenturyLink QC to be Regulated Pursuant to Minn. Stat. § 237.025; Competitive Market Regulation

**DOCKET NO. P-421/AM-16-496** 

RESPONSIVE COMMENTS
OF THE OFFICE OF
THE ATTORNEY GENERAL

The Office of the Attorney General—Residential Utilities and Antitrust Division ("OAG") submits the following Comments in response to the Commission's August 22, 2016 Notice of Comment Period Regarding Completeness and the comments of commissioners at the August 25, 2016 agenda meeting. The Commission requested "comments, initial, supplemental or responsive, from interested parties regarding completeness." These Comments will address the completeness standard and additional information required from CenturyLink to complete its petition.

### I. BACKGROUND

In August 15, 2016 Comments, the OAG concluded—and continues to conclude—that CenturyLink had filed an incomplete petition in this docket. As a result, the OAG objected to the petition and recommended that more information be filed by the Company in order to complete the petition. The Comments detailed deficiencies in the initial petition regarding the information required under the statute, from basic, facial deficiencies such as the lack of a list of local services in each exchange area, to more complex deficiencies related to a lack of

methodological detail and data to support the analyses submitted by the Company.<sup>1</sup> A list of questions that would help resolve some of the deficiencies was then offered to provide guidance for future and/or supplemental filings.<sup>2</sup> In Section II of these Comments, the OAG will provide additional detail regarding the proper standard for completeness and what additional documentation is required from CenturyLink in order to find the petition complete.

The Department of Commerce ("Department") also filed Comments on August 15. The Department objected to the petition as incomplete and provided a list of deficiencies in CenturyLink's petition.<sup>3</sup> The Department anticipated that "at a minimum, the Commission will need reliable technical information" regarding CenturyLink's assertion that wireless coverage qualifies as an "adequate competitive service" under the new statute.<sup>4</sup> In order to supplement the record and potentially complete the petition, the Department recommended that the docket remain open to allow the Company to provide the supplemental information so that the Commission could then "establish a process to determine whether the petition is complete."<sup>5</sup>

### II. THE PROPER ANALYSIS OF COMPLETENESS

The Commission's August 22, 2016 Notice of Comment Period and the questions from commissioners at the August 25, 2016 Agenda Meeting indicated a desire for parties to develop the record on the proper analysis of completeness in this case. The Competitive Market Statute was enacted in May 2016. CenturyLink filed its petition one month later. The OAG's August 15, 2016 Comments objected to the petition as being incomplete and provided a basis to support this conclusion. This continues to be the only reasonable conclusion that can be made based on

<sup>&</sup>lt;sup>1</sup> OAG's August 15, 2016 Comments, at 6–13.

 $<sup>^{2}</sup>$  *Id.* at 14–15.

<sup>&</sup>lt;sup>3</sup> Department's August 15, 2016 Comments, at 3–8.

<sup>&</sup>lt;sup>4</sup> *Id*. at 9.

<sup>5</sup> Id.

the petition filed by the Company. This section will explain the standard the Commission should use to determine completeness and why this standard is distinct, both methodologically and temporally, from the Commission's analysis of the merits.

The Commission and other parties regularly review applicants' petitions under various statutes within Commission jurisdiction. These processes, such as those envisioned in petitions for certificates of need or route or site permits, 6 describe specific contents that must be present in a petition under those rules. For energy utilities' rate increase filings, parties include information in the initial filing that are required as a result of statutes, rules, and prior orders; Xcel's most recent rate case filing included a 45 page summary of compliance requirements. In this case, completeness may be more difficult to define, given its status as an issue of first impression for the Commission, a lack of prior rulemaking to define required elements of the petition, and a lack of prior orders to guide parties' initial review. Despite these challenges, there are principles that can be articulated and then applied to CenturyLink's petition to identify specific requirements the petition is missing in the Company's initial filing.

### A. THE COMPLETENESS STANDARD

The Commission should apply a completeness standard that defines a complete petition as one that contains sufficient supporting information to allow parties to undertake the work necessary to analyze the merits of the petition. Given the short timeline in the statute once a complete petition has been submitted, the Commission should ensure that parties have the foundational elements that will allow them to conduct analysis on the petition in place before a finding of completeness is made. In essence, a carrier filing a petition under this statute must

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<sup>&</sup>lt;sup>6</sup> Minn. R. § 7849; Minn. R. § 7850.

<sup>&</sup>lt;sup>7</sup> Direct Testimony of Akash Chandarana, *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E002/GR-15-826, Schedule 2 (Nov. 2, 2015).

"show its work" in the initial filing in order to have a complete petition for review. CenturyLink has not shown its work. As a result, any analysis of the merits of the petition is both premature and impossible, given the lack of detail provided in the petition.

The filing of the superficial results of analyses performed by the Company with no supporting data or workpapers does not allow for any analysis necessary on the merits of the petition. This leaves the Commission with a take-it-or-leave-it approach and shuts out other parties' ability to perform analysis of the petition using the same data set relied upon by the Company.

Such scant data would not be allowed in any other Commission proceeding. It would be similar to an energy utility purporting to file a sales forecast in a general rate case without also providing the volumes of data to support its results, and only a table or a graph reporting the results of its analysis. The utility could argue, in that case, that it has filed the results of its sales forecast and that no party demonstrated that it was unreasonable. But, such a result would only be realized because no party had the ability to properly analyze and critique the company's claim using the company's data. In order for parties to conduct analysis on the merits, a company must show its work.

A complete filing does not foreclose the subsequent requests for information by parties and the Commission—in fact, many of these questions arise only when parties can thoroughly investigate a complete initial petition that contains all information relied upon by the company in its initial analysis. But this analysis cannot occur without sufficient data in the record. The next section will identify specific parts of CenturyLink's petition that are missing.

#### В. THE APPLICATION OF A COMPLETENESS STANDARD TO CENTURYLINK'S **PETITION**

In applying the completeness standard articulated above, CenturyLink's initially-filed petition is incomplete because it is missing basic statutory elements and because of the absence of supporting data.

First, there are basic statutory elements that were not addressed in the initial petition. The most straightforward example is the requirement in subdivision 2(b)(2), which requires a list of "the local services offered by the local exchange carrier in each exchange area." The OAG commented on this requirement in its August 15 Comments.<sup>8</sup> CenturyLink was asked about this provision during the Commission's August 25 Agenda Meeting and acknowledged that it did not submit an actual list of local services, but rather a link to its national website. According to the Company's representative, this particular statutory element was pre-judged by the Company to be unimportant to the analysis and thus not required to be actually included in the filing. This is an example of a basic statutory requirement that CenturyLink could have easily provided in its filing, but did not.

Second, there are several significant shortcomings in CenturyLink's petition where the Company failed to show its work and the absence of those supporting data will be likely to prevent parties from conducting analysis on the merits of the petition. This section will cover each filing requirement and will describe why CenturyLink has failed to submit a complete petition.

#### 1. **List of Exchange Areas**

CenturyLink's list of exchange areas—a critical component of its required showing—was populated with proprietary data using a licensed "allocation tool" that does not produce

<sup>&</sup>lt;sup>8</sup> OAG's August 15, 2016 Comments, at 7.

workpapers. Without this data, which generates the number of households in each exchange area, parties must take CenturyLink at its word that its analysis is accurate. Given the central importance that the number of households has in the statutory criteria, it is unreasonable for CenturyLink to rely upon a proprietary data set and a proprietary analysis tool to generate this information. CenturyLink must provide the data and the tool used to generate its list of exchange areas in order to complete this statutory filing requirement.

### 2. Local Services Offered by Carrier

The requirement to provide a list of local services offered in each exchange area, in addition to being a relatively straightforward aspect of the statute with which CenturyLink did not comply, is also an important part of the analysis. A list of local services in each exchange area allows parties to analyze how CenturyLink is defining the scope of its customers. In other words, it provides parties with additional insight into how CenturyLink is classifying its customers for the purpose of meeting the statutory criteria. This could help parties compare CenturyLink customer data with the types of services it argues qualifies under the statute. CenturyLink must provide a complete list of each local service offering provided in each exchange service area along with a citation to the tariff page or pages in order to complete this statutory filing requirement.

### 3. Competitive Service Providers in Exchange Service Area

The next deficiency is the required list of competitive service providers in each exchange service area that was included in CenturyLink's initial petition. The affidavit and accompanying

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<sup>&</sup>lt;sup>9</sup> *Id.* at 6.

<sup>&</sup>lt;sup>10</sup> CenturyLink must show that it serves fewer than 50 percent of households in an exchange service area. Minn. Stat. § 237.025 subd. 4(1). This showing necessarily requires two data points for each exchange service area: the number of households and the number of households served by CenturyLink. By not providing supporting information regarding its calculation of the number of households it serves, other parties are unable to verify a key component of the statutory showing.

schedules summarily lists "major" wireless providers and facilities-based cable providers purported to be operating in the exchange service areas.<sup>11</sup> There is no information provided regarding how this list was generated, including the data sources used to generate the list. CenturyLink also includes wireless maps, similar to the type used in wireless providers' marketing material, but includes no supporting material regarding the strength of coverage, availability of coverage, or the accuracy of the maps. CenturyLink must provide the data source or sources it relied upon to produce the list of competitive service providers in each exchange area and it must also provide data to support the creation of its wireless coverage maps and any other data relied upon in its determination that a wireless carrier serves customers or offers service to customers within each exchange service area in order to complete this statutory requirement.

### Affiliate Relationships with Any Provider of Local Service within 4. **Exchange Service Area**

CenturyLink stated that it "does not have an affiliate relationship with any provider of local service that it is relying upon to demonstrate that it meets the competitive criteria in each exchange area." <sup>12</sup> In a footnote, it also stated that it is beginning to offer residential VOIP service, but did not have any customers as of December 31, 2015 "the date of the data used in this Petition."<sup>13</sup> CenturyLink did not provide a rationale in support of its decision to use December 31, 2015 as the cutoff date for use in this petition, nor did it include any further explanation of its offering of residential VOIP service in 2016, the year in which the petition was filed. Given the uncertainty regarding the provision of voice service by CenturyLink affiliates in

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<sup>&</sup>lt;sup>11</sup> Affidavit of Robert Brigham, at ¶ 16.  $^{12}$  CenturyLink Petition, at 4.  $^{13}$  *Id*.

2016, CenturyLink must provide additional detail regarding its use of 2015 data and about its residential voice VOIP offering in order to complete this statutory requirement.

#### 5. **Demonstration of Loss of Local Voice Service Customers**

CenturyLink's confidential Exhibit RHB-8 contains a summary table that purports to be "documentation demonstrating the local exchange carrier's loss of local voice service customers to unaffiliated competitive service providers" over at least the past five years. 14 Like other parts of its petition, CenturyLink provides only the results of its analysis, but no supporting data or methodological explanations. Again, parties are left to take the Company at its word that what it purports to show is accurate. CenturyLink must provide the data used to create its confidential Exhibit RHB-8 in order to complete this statutory requirement.

#### 6. **Evidence Related to Competitive Criteria**

The Commission must determine whether CenturyLink has met the competitive criteria set forth under the statute, but there are important pieces of this analysis that are missing or incomplete. For example, in a response to an information request, CenturyLink states that it performed a "special study to identify the business customers with three or fewer lines," but provided no additional detail regarding the billing study it performed beyond the results of that study. Without this information, parties are left to assume that CenturyLink's tally of business customers is accurate. 15 A similar issue arises for CenturyLink's tally of residential customers merely mentioning that "billing data" was used for the analysis does not provide the detail necessary for parties to analyze this aspect of the filing. <sup>16</sup> The import of these foundational elements of CenturyLink's petition cannot be overstated because, together with the calculation of

Minn. Stat. § 237.025 subd. 2(b)(5).
 CenturyLink's Response to Department Information Request No. 6, attached as Schedule JAD-01.
 Affidavit of Robert Brigham, at ¶ 6.

the number of households in each exchange area, the number of residential and small business customers comprises one of the two required showings under the statute. An analysis on the merits cannot proceed until CenturyLink has provided the justification and the data for the analysis it performed to calculate the number of residential and small business voice customers it serves.

### 7. Other Information Requested by the Commission

The final prong under subdivision 2 serves a limited, but useful purpose in the context of developing a complete petition. The provision allows the Commission to request other information "that is relevant to the applicable competitive criteria" to be included in a complete petition. Far from being an open-ended provision that could allow for an indefinite delay, this provision simply allows the Commission to request that additional, relevant information be filed before a petition can be deemed complete. This information could be prompted by comments by parties on completeness, such as the comments filed by the OAG and Department in this case, or the information could be required of future carriers petitioning under this statute. Specifically, this provision allows the Commission to request of parties the type of information identified by the OAG in these Comments. This provision gives parties the full 180 days allowed in the statute to analyze the merits instead of using a substantial portion of that time conducting discovery to procure the supporting, initial data from the company. Just as an energy company cannot file only summaries of the results of its analyses in a rate case, such as its sales forecast or class cost of service study, CenturyLink must file more than summaries of the results of its analyses. This provision allows the Commission to require CenturyLink to go beyond checking the boxes of its statutory filing requirements and show its work.

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<sup>&</sup>lt;sup>17</sup> Minn. Stat. § 237.025 subd. 2(b)(7).

### C. COMPLETENESS VERSUS SUFFICIENCY

One of the difficulties of this particular analysis, as alluded to in deliberation by commissioners on August 25, is that the line between the analysis of completeness versus the analysis of sufficiency is not always easily-defined. That is so because the competitive criteria upon which the Commission will ultimately decide the merits are primarily fact-based, as are many of the concerns regarding completeness raised here and in prior comments. application of the completeness standard as defined in these Comments can assist the Commission in this exercise. As-filed, it is unclear how parties can actually analyze the showing purportedly made in CenturyLink's petition. The raw data and methodologies relied upon by CenturyLink are nonexistent and the petition is incomplete. A complete petition, on the other hand, will allow parties to move onto an analysis of the merits. This analysis will utilize the data provided by CenturyLink in a supplemental filing to test the rigor of the Company's analysis and to ensure that the definitions and assumptions used by the Company are reasonable in demonstrating what is required under the statute. Some of the questions raised in the OAG's August 15 Comments will be answered in this phase of the analysis, once the petition is complete.

### III. PROCEDURAL RECOMMENTATION

The Commission can either reject CenturyLink's petition as incomplete and allow it to re-file an initial petition to attempt to address the deficiencies highlighted by parties or it can keep the docket open and allow for CenturyLink to supplement its initial petition at a future date. Under either scenario, the Commission should allow parties to comment on the completeness of the petition and then make a completeness determination.

Specifically, the Commission should require CenturyLink to file the following, in order to have a complete petition:

- The data and the tool used to generate its list of exchange areas;
- A complete list of each local service offering provided in each exchange service area along with a citation to the tariff page or pages;
- The data source or sources it relied upon to produce the list of competitive service providers in each exchange area;
- Data to support the creation of its wireless coverage maps and any other data relied upon in its determination that a wireless carrier serves customers or offers service to customers within each exchange service area;
- Additional detail regarding the appropriateness of using 2015 data;
- Data on its residential voice VOIP offering and number of customers as of 7/31/2016;
- The data used to create its confidential Exhibit RHB-8;
- The justification and the data for the analysis it performed to calculate the number of residential and small business voice customers it serves; and
- Other information required by the Commission.

Once the Commission has a complete petition to review, the 180-day timeline begins and the Commission can establish a procedure for review of the merits, such as a contested case. Subsequent requests by the Commission from the petitioner or any other party at that stage do not affect the 180-day timeframe and the petitioner and all other parties will have clarity and certainty regarding the time of final determination. <sup>18</sup>

### **CONCLUSION**

CenturyLink has filed an incomplete petition. The OAG and the Department have filed comments that provide detail regarding this incomplete filing and that suggest specific pieces of information that would help supplement the record. The Commission should find that CenturyLink has filed an incomplete petition and allow it to provide evidence to remedy the deficiencies in the current petition. The Commission should find that a complete petition should contain supporting information sufficient to allow parties to begin the work necessary to analyze the merits of the petition. In other words, a complete petition is one in which CenturyLink

<sup>&</sup>lt;sup>18</sup> See Minn. Stat. § 237.025 subd. 3(f) (noting that the Commission can, "[i]n reviewing the petition," seek additional information).

shows its work. Once CenturyLink has supplemented the record with the specific items described herein, the Commission may then determine whether the petition is complete and then, and only then, set forth on the merits within the 180-day timeline.

Dated: August 29, 2016. Respectfully submitted,

LORI SWANSON Attorney General State of Minnesota

/s/ Joseph A. Dammel

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## STATE OF MINNESOTA

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August 29, 2016

Mr. Daniel Wolf, Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place East, Suite 350 St. Paul, MN 55101-2147

RE: In the Matter of the Petition of CenturyLink QC to be Regulated Pursuant to Minn. Stat. § 237.05; Competitive Market Regulation Docket No. P421/AM-16-496

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find *Responsive Comments of the Office of the Attorney General*.

By copy of this letter, all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

/s/ Joseph A. Dammel

JOSEPH A. DAMMEL Assistant Attorney General

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**Enclosure** 

### AFFIDAVIT OF SERVICE

RE: In the Matter of the Petition of CenturyLink QC to be Regulated Pursuant to Minn. Stat. § 237.05; Competitive Market Regulation Docket No. P421/AM-16-496

STATE OF MINNESOTA ) ss. COUNTY OF RAMSEY )

I, TERESA WINGER, hereby state that on August 29, 2016, I filed with eDockets *Responsive Comments of the Office of the Attorney General* and served the same upon all parties listed on the attached service list by email, 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/ Teresa Winger
Teresa Winger

Subscribed and sworn to before me this 29th day of August, 2016.

s/Ruth M. Busch

**Notary Public** 

My Commission expires: January 31, 2020

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Charles	Forst	charles.forst@zayo.com	Zayo Group, LLc	1621 18th Street Suite 100 Denver, CO 80202	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Lisa Jill	Freeman	ljfreeman@bandwidth.com	Bandwidth.com CLEC, LLC	Venture Center III - 5th Floor 900 Main Campus Dri Raleigh, NC 27606	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Alexander E	Gertsburg	agertsburg@broadvox.com	Broadvox-CLEC, LLC	75 Erieview Plaza Ste 400  Cleveland, OH 44114	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jim	Gleason	jgleason@claritycomm.net	Clarity Telecom, LLC	104 E Center St Ste 201 Sikeston, MO 63801-4108	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Linda	Gordon	N/A	BG Enterprises, Inc.	4214 Mount Ave  Missoula, MT 59804	Paper Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Assoc	PO Box 304 308 Frontage Rd Sebeka, MN 56477	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Brian	Gustas	bgustas@matrixbt.com	Matrix Telecom, Inc.	433 E Las Colinas Blvd Ste 400 Irving, TX 75039	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
K.C.	Halm	kchalm@dwt.com	Davis Wright Tremaine LLP	Suite 800 1919 Pennsylvania Av Washington, DC 200063402	Electronic Service enue	No	SPL_SL_16-496_Initial Filing - Kevin
Bruce	Hanson	N/A	Clara City Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	SPL_SL_16-496_Initial Filing - Kevin

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
larrod	Harper	jharper@broadviewnet.com	Broadview Networks Inc	1018 West 9th Ave.  King Of Prussia, PA 19406	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
John	Harrington	jharrington@inteliquent.co m	Neutral Tandem-Minnesota	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Donna	Heaston	Donna.Heaston@IntegraTe lecom.com	Integra Telecom of MN, Inc	6160 Golden Hills Drive Golden Valley, MN 55416	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Randall J.	Herman	rjherman@access-com.net	Access Communications Technologies	5005 Cheshire Pkwy N Ste 1 Plymouth, MN 55446	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
James	Hickle	jim.hickle@velocitytelephon e.com	Velocity Telephone Inc	4050 Olson Memorial Hwy Ste 100 Golden Valley, MN 55422	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Angela	Hoke	Angela.Hoke@birch.com	Ionex Communications North, Inc. dba Birch Communications	2323 Grand Blvd Ste 925  Kansas City, MO 64108	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Pamela	Hollick	N/A	Broadwing Communications, LLC	4625 W 86th St Ste 500 Indianapolis, IN 46268	Paper Service	No	SPL_SL_16-496_Initial Filing - Kevin
Pamela	Hollick	N/A	Global Crossing Local Services, Inc.	4625 W 86th St Ste 500 Indianapolis, IN 46268	Paper Service	No	SPL_SL_16-496_Initial Filing - Kevin
Pamela	Hollick	Pamela.Hollick@Level3.co m	Level 3 Communications, LLC	4625 W. 86th Street Suite 500 Indianapolis, IN 46268	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Kevin	Hopkins	khopkins@telephoneassoci ates.com	Telephone Associates, Inc.	329 Grand Ave Superior, WI 54880	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Kim	Isaacs	kdisaacs@integratelecom.c om	Integra Telecom, Inc.	6160 Golden Hills Dr.  Golden Valley, MN 55416	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
John	Jennings	jjennings@bigrivertelephon e.com	Big River Telephone Company, LLC	24 South Minnesota Avenue Cape Girardeau, MO 63702	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Bill	Jensen	bjensen@mediacomcc.com	Mediacom Minnesota LLC	PO Box 110 1504 2nd Street SE Waseca, MN 56093	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Sherry	Jergenson	sjergenson@acentek.net	Ace Link Telecommunications Inc	207 E CEDAR ST PO BOX 360 HOUSTON, MN 55943	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Laura	Kangas	Ikangas@palmerwireless.c om	Palmer Wireless, LLC	3127 120th Ave Clear Lake, MN 55319	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Kenneth	Kapler	kkapler@vnetusa.com	Virtual Network Solutions, Inc.	Suite G 2698 Route 516 Old Bridge, NJ 8857	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Adam	King	dialupmaster@youbetnet.n et	KTF Telcom Inc	P.O. Box 135 Mora, MN 55051	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Jeremy	Kissel	regulatory@globalcapacity.	GC Pivotal, LLC	180 North LaSalle Street Suite 2430 Chicago, Illinois 60601	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Larry	Knegendorf		Baldwin Broadband, LLC	930 Maple Street  Baldwin, WI 54002	Paper Service	No	SPL_SL_16-496_Initial Filing - Kevin
Rex	Knowles	Rex.Knowles@xo.com	XO Communications Services, Inc.	8851 Sandy Parkway Sandy, UT 84070	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jim	Kolezynski	jkolezynski@eastonteleco m.com	Easton Telecom Services, L.L.C.	Summit II 3046 Brecksville Rd Richfield, OH 44286	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Ron	Kooistra	rkooistra@corp.earthlink.co m	EarthLink Business, LLC (fka New Edge Network, Inc. dba EarthLink Business)	2851 Charlevoix Dr SE  Grand Rapids, MI 49546	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jeff	Korn	jkorn@storesonline.com	Crexendo Business Solutions, Inc.	1303 N Research Way Orem, UT 84097	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Tim	Koxlien	tim@telequality.com	TeleQuality Communications, Inc.	21232 Gathering Oak Ste 107 San Antonio, TX 78260	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Deborah L.	Kuhn	deborah.kuhn@verizon.co m	Verizon Wireless	205 N Michigan Ave FL 7 C/O VERIZON Chicago, IL 60601	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Kevin	Larson	klarson@ctctelcom.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Bret	Lawson	bret.lawson@sprint.com	Sprint/Nextel Corp.	6450 Sprint Parkway KSOP HN0304 - 3B51 Overland Park, KS 66251	Electronic Service 11	No	SPL_SL_16-496_Initial Filing - Kevin
James W.	Lienau		New-Cell, Inc.	PO Box 19079 450 Security Blvd. Green Bay, WI 543079079	Paper Service	No	SPL_SL_16-496_Initial Filing - Kevin
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_16-496_Initial Filing - Kevin
Colleen	Lockett	regulatory@intrado.com	Intrado Communications Inc.	1601 Dry Creek Dr.  Longmont, CO 80503	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Mary	Lohnes	mary_lohnes@mmi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Greg	Lohrenz	gregl@aitech.net	Advanced Integrated Technologies	9855 W 78th St Ste 300  Eden Prairie, MN 55344	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Timothy	Loken	Tim.P.Loken@windstream.com	Windstream Communications, Inc.	4001 N Rodney Perham Rd  Little Rock, AR 72212	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
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	SPL_SL_16-496_Initial Filing - Kevin
Robert W.	McCausland	robert.mccausland@h3net. com	Hypercube Telecom, LLC	3200 W Pleasant Run Rd Ste 300 Lancaster, TX 75146	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Brian	McClintock	BMcClintock@tncii.com	TNCI Operating Company LLC	114 E Haley St Ste I Santa Barbara, CA 93101	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Laurie	McDonough	laurie.mcdonough@acninc.com	ACN Communication Services, Inc.	1000 Progress Place  Concord, NC 28025	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Brian	McIntyre	brian.mcintyre@dish.com	dishNET Wireline L.L.C.	9601 S. Meridian Blvd  Englewood, CO 80112-5905	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Karin	Medlin	karin.e.gray@sprint.com	Sprint Spectrum L.P.	6360 Sprint Parkway Mail Stop: KSOPHE01 1D412 Overland Park, KS 66251	Electronic Service 02-	No	SPL_SL_16-496_Initial Filing - Kevin
Anthony	Mendoza	tony@mendozalawoffice.co m	Mendoza Law Office, LLC	1000 University Ave Ste 222 Saint Paul, MN 55104	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Michael R.	Moore	michael.moore@charter.co m	Charter Communications, Inc.	12405 Powerscourt Dr St. Louis, MO 63131	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jill	Mounsey	N/A	AT&T Wireless Services, Inc.	PO Box 97061 7277 104th Ave NE Redmond, WA 980739761	Paper Service	No	SPL_SL_16-496_Initial Filing - Kevin
Lance	Murphy	lance.murphy@verizonwirel ess.com	Verizon Wireless	24242 Northwestern Hwy Southfield, MI 48075	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Glen	Nelson	regulatory@nhcgrp.com	New Horizons Communications Corp.	420 Bedford St Ste 250  Lexington, MA 02420	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Lyndall	Nipps	lyndall.nipps@windstream. com	Windstream	655 W. Broadway, Ste. 850  San Diego, CA 92101	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Lyndall	Nipps	WCI.Minnesota.govaffairs @windstream.com	McLeodUSA Telecommunications Services, LLC	655 W. Broadway Suite 850 San Diego, CA 92101	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Steve	Nisbet	snisbet@whe.org	WH Link	P.O. Box 330 6800 Electric Drive Rockford, MN 553730330	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jerry	Nussbaum	preferred@aol.com	Preferred Long Distance, Inc.	Suite 350 16830 Ventura Boulev Encino, CA 91436	Electronic Service ard	No	SPL_SL_16-496_Initial Filing - Kevin
Matt	O'Flaherty	oflaherty.matt@gmail.com	SelecTel, Inc.	1825 N Bell St Freemont, NE 68025	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Dan	Olsen	dano@windom-mn.com	City of Windom	444 9th St Windom, MN 56101-0038	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Mike	Orcutt	mgorcutt@nttservices.com	Nebraska Technology & Telecommunications, In.	2308 S. 156 Circle  Omaha, NE 68130	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Doug	Osborne	dosborne@localaccessllc.c om	Local Access LLC	11442 Lake Butler Blvd Windermere, FL 34786	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Sheila	Paananen	sp1484@att.com	AT&T National Access Management	26019 NE 34th St Redmond, WA 98053	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Becky	Parker	bparker@nextera.net	Nextera Communications, LLC	7115 Forthun Rd Suite 100 Baxter, MN 56425	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Mark	Pavol	regulatory@ymaxcorp.com	YMAX Communications Corp.	PO BOX 6785  West Palm Beach, FL 33404-6785	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dan	Pecarina	dpecarina@exchange.hbci. com	Hiawatha Broadband Communications, Inc	58 Johnson St Winona, MN 55987	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Rochelle	Pervisky	RPervisky@exchange.hbci.com	Hiawatha Broadband	58 Johnson Street  Winona, MN 55987	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Bonnie	Pettis	accounting@ideaone.com	IdeaOne Telecom, Inc. dba Enventis	3312 42nd St S Suite 100 Fargo, ND 58104	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive  Burnsville,  MN 55306	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Patrick	Phipps	regulatory@peerlessnetwor k.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, Suite 2730 Chicago, IL 60606	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Lauren	Predmore	Ipredmore@mediacomcc.c om	MCC Telephony of Minnesota, LLC dba Mediacom	One Medicacom Way  Mediacom Park, NY 10918	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Lisa	Purcell	Ipurcell@lightedge.com	LH Telecom, Inc.	215 10th St Ste 1000  Des Moines, IA 50309	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Brian	Rankin	brian_rankin@comcast.co m	Comcast Cable Communications	1701 John F Kennedy Blvd FL 55 Philadelphia, PA 19103	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Susan	Rapinz	srapinz@broadvox.com	Cypress Communications Operating Company, LLC	75 Erieview Plaza Suite 400 Cleveland, OH 44114	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Haran	Rashes	hrashes@clearrate.com	Clear Rate Communications, Inc.	Clear Rate Communications, Inc. 555 S. Old Woodward Suite 600 Birmingham, MI 48009	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
leff	Rhoden	jrhoden@mind.net	Prime Time Ventures, LLC	Suite 202 210 West 8th Street Medford, OR 97501	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Carrie	Rice	Carrie.Rice@enventis.com	Enventis Telecom, Inc.	221 E Hickory St  Mankato, MN 56001-3610	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Robert S	Rife	grodham@diversifiedconsu lting.net	Broadband Dynamics, LLC	8757 E Via De Commercio FL 1 Scottsdale, AZ 85258-3359	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Susan	Riley		New Cingular Wireless	Suite 1520 5565 Glenridge Conne Atlanta, GA 30342	Paper Service ector	No	SPL_SL_16-496_Initial Filing - Kevin
Emily	Roberts	emily.roberts@windstream.com	PAETEC Business Services	c/o Windstream 1450 N Center Point F Hiawatha, IA 52233	Electronic Service td	No	SPL_SL_16-496_Initial Filing - Kevin
Natalia	Rodrigues	nrodrigues@wcs.com	Wholesale Carrier Services, Inc.	5471 N. University Drive  Coral Springs, FL 33067	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Michael	Ruziska	regulatory@entelegent.com	EnTelegent Solutions, Inc.	3800 Arco Corporate Drive Suite 310 Charlotte, NC 28273	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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David	Schornack	david.schornack@arvig.co m	Tekstar Communications, Inc.	150 2nd St SW  Perham, MN 56573	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Dave	Schultz	dschultz@paulbunyan.net	Paul Bunyan Telephone	1831 Anne Street NW  Bemidji, MN 56601	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Kevin	Seamans	KEVIN.SEAMANS@BEST BUY.COM	BBY Networks, Inc	7601 Penn Ave.  Richfield, MN 55423	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Michael	Shultz	michael.shultz@consolidat ed.com	Consolidated Communications	350 S Loop 336 W  Conroe, TX 77304-3308	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Cathy	Shuman	cathy.shuman@ci.monticell o.mn.us	FiberNet Monticello	505 Walnut St Ste 1  Monticello, MN 55362	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Richard	Sjoberg	rsjoberg@mncable.net	Sjoberg'S, Inc.	315 North Main Street  Thief River Falls, MN 56701	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Cathie	Skluzacek	skluzace@stolaf.edu	St. Olaf College	1520 St Olaf Ave  Northfield,  MN  55057	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
David	Skogen	dskogen@gcioa.com	Global Connection Inc. of America	5555 Oakbrook Pkwy Ste 620 Norcross, GA 30093	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
leff	Slater	jeff.slater@rclec.com	RCLEC, Inc.	20 Davis Dr Belmont, CA 94002	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
David J.	Smat	regulatory@ingts.com	iNetworks Group, Inc.	Suite 2510 125 S. Wacker Drive Chicago, IL 60606	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Anna	Sokolin Maimon	amaimon@mediacomcc.co m	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way  Mediacom Park, NY 10918	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Chris	Staton	cstaton@pipertel.com	Pipertel Communications, LLC	9580 W. 14th Avenue Suite 100 Lakewood, CO 80215	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Keith	Stubbe	tunesrus@iw.net	Southwest Minnesota Broadband Services	PO BOX 1006 Lakefield, MN 56150	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Scott	Terry	scott.a.terry@windstream.com	Windstream Lakedale, Inc.	401 Rodney Parham Road B1-F02-1221A Little Rock, AR 72212	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Mark	Thoma	markthoma@wctatel.com	Winnebago Coop. Telecom Assoc.	704 E Main St Lake Mills, IA 50450	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Shirley	Thomas	shirley.thomas@orange.co m	France Telecom Corporate Solutions L.L.C.	13775 McLearen Road Oak Hill, VA 20171	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Elena	Thomasson	elena.thomasson@birch.co m	Cbeyond Communications, LLC dba Birch	3060 Peachtree Rd Suite 1065 Atlanta, GA 30305	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Claudia	Tiger	ctiger@bcntele.com	BCN Telecom, Inc.	1200 Mt. Kemble Ave. 3rd FI. Harding Township, NJ 07960	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jason	Торр	jason.topp@centurylink.co m	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Brad	VanLeur	bvanleur@orbitcominc.net	OrbitCom, Inc.	1701 North Louise Avenue Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Nancy A.	Vogel	nancy_vogel@mmi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jim	Walter	jwalter@702communication s.com	VAL-ED Joint Venture, LLP	Dba 702 Communications 702 Main Avenue Moorhead, MN 56560	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Jared	Welch	jared.welch@accesspointin c.com	Access Point, Inc.	1100 Crescent Green Ste 109 Cary, NC 27518	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Karly	Werner	karly_werner@cable.comc ast.com	Comcast Phone of Minnesota, Inc.	10 River Park Plaza St. Paul, MN 55107	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Doyca	Wickham	doyca.wickham@voltdelta.com	LSSI Data Corp.	1600 Stewart Ave. Suite 305 Westbury, NY 11590	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Karrie	Willis	kwillis@popp.com	POPP.com, Inc.	620 Mendelssohn Ave N  Golden Valley, MN 55427	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin
Kristi	Woldt	N/A	Airadigm Communications, Inc.	Suite 50B 100 West College Ave Appleton, WI 54911	Paper Service nue	No	SPL_SL_16-496_Initial Filing - Kevin
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	SPL_SL_16-496_Initial Filing - Kevin
Brian	Worthen	bworthen@mammothnetwo rks.com	InTTec, Inc.	1001 South Douglas Highway Box 2799 Gillette, WY 82717	Electronic Service	No	SPL_SL_16-496_Initial Filing - Kevin

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Anita	Yokiel	regulatory@hickorytech.com	Consolidated Communications	221 E Hickory Street PO Box 3248 Mankato, Minnesota 56001	Electronic Service	1	SPL_SL_16-496_Initial Filing - Kevin
Christopher P	Yost		Communications Infrastructure Investments, LLC	C/O Zayo Group 1805 29th St Boulder, CO 80301	Electronic Service		SPL_SL_16-496_Initial Filing - Kevin