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June 8, 2022

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

**Re: *In the Matter of a Petition of LTD Broadband LLC to Expand Its Designation as an Eligible Telecommunications Carrier***  
**MPUC Docket No. P-6995/M-21-133**

***In the Matter of a Petition to Initiate a Proceeding to Revoke the Expanded Eligible Telecommunications Carrier (“ETC”) Designation of LTD Broadband, LLC (“LTD”) and Deny LTD’s Funding Certification for 2023***  
**MPUC Docket No. P-558, P-6995/M-22-221**

Dear Mr. Seuffert:

The Minnesota Office of the Attorney General—Residential Utilities Division (“OAG”) files this letter to respond to some of the points raised in initial comments in this proceeding. For the reasons articulated in its initial comments, the OAG continues to recommend that the Minnesota Public Utilities Commission (“Commission”) initiate a proceeding to consider whether LTD Broadband LLC (“LTD” or “Company”) is able to fulfill its federal Universal Service Rural Digital Opportunity Fund (“RDOF”) obligations or the Commission should revoke LTD’s expanded Eligible Telecommunications Carrier (“ETC”) designation.

### **Background**

On May 6, 2022, the Minnesota Telecommunications Alliance (“MTA”) and the Minnesota Rural Electric Association (“MREA”) jointly submitted a petition asking the Commission to initiate a proceeding to consider revoking LTD’s expanded ETC designation and denying the Company’s ETC certification for 2023 (“Petition”).<sup>1</sup> On May 11, 2022, the Commission issued a Notice of Comment Period (“Notice”) asking, among other things, whether it should initiate a proceeding to determine whether LTD’s expanded ETC designation should be revoked.<sup>2</sup> On

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<sup>1</sup> Docket No. P-6995/M-21-133, Petition of MTA and MREA (May 6, 2022) (“Petition”) (eDockets [20225-185600-02](https://www.dockets.org/Case/20225-185600-02)).

<sup>2</sup> Docket Nos. P-6995/M-21-133 and P-558, P-6995/M-22-221, Notice of Comment Period (May 11, 2022) (eDockets [20225-185646-02](https://www.dockets.org/Case/20225-185646-02)).

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June 1, 2022, parties filed initial comments in this matter.<sup>3</sup> Public comments were filed in this matter by associations, non-profit organizations, unions, and counties on various dates.

### **Additional Matters and Points of Clarification**

The OAG addresses the following additional matters and points of clarification arising from the initial comments filed in this proceeding.

**2022 ETC Certification to Receive 2023 Federal Universal Service RDOF Funding.** Many comments, including the OAG's, reference LTD's 2023 ETC certification or recertification. In the interest of a clear record, the OAG notes that the next ETC certification proceeding would typically occur in the fall of 2022 and would be used to determine the eligibility of ETCs for 2023 federal Universal Service High Cost Program ("High Cost") support.<sup>4</sup>

This year's annual ETC certification process is will not be typical.

- In April 2022, the Federal Communications Commission ("FCC" or "Agency") decided to revise the FCC Form 481 (the form that kicks-off the annual High Cost certification process) and the form instructions to reflect changes to reporting obligations from the agency's orders.<sup>5</sup>
- Consequently, the FCC waived the July 1, 2022, FCC Form 481 filing deadline pending approval of a revised form by the Office of Management and Budget ("OMB") and the announcement by the FCC of a new form filing deadline.<sup>6</sup>
- On June 1, 2022, the FCC published a notice in the Federal Register seeking Paperwork Reduction Act ("PRA") comments on the proposed revised FCC Form 481.<sup>7</sup> The deadline for initial PRA comments is July 1, 2022, the date that ETCs are typically required to file their completed FCC Forms 481 with the FCC and the Commission.<sup>8</sup>
- Without an OMB-approved FCC Form 481 finalized by July 1, 2022, and without the announcement of a new form filing deadline by the FCC, the schedule for the 2022 annual ETC certification process is unclear.

Regardless, LTD is correct that an ETC is not obligated to file an FCC Form 481 until it actually receives High Cost support.<sup>9</sup> Thus, unless the FCC approves LTD's RDOF long-form application,

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<sup>3</sup> See generally Docket Nos. P-6995/M-21-133 and P-558, P-6995/M-22-221.

<sup>4</sup> See [47 C.F.R. § 54.314](#); *In the Matter of Annual Certifications Related to Eligible Telecommunications Carriers' Use of Federal Universal Service Support*, Docket No. P-999/PR-14-8, ORDER at 1 (Apr. 11, 2014). ("Commission ETC Scheduling Order").

<sup>5</sup> Wireline Competition Bureau Announces Availability of FCC Form 481 on the Universal Service Administrative Company's One Portal, WC Docket No. 10-90, [Public Notice](#), DA 22-352 at 1 (Apr. 1, 2022).

<sup>6</sup> *Id.*

<sup>7</sup> Information Collection Notice, [87 Fed. Reg. 33154](#) (June 1, 2022).

<sup>8</sup> *Id.*; see also [Commission ETC Scheduling Order](#) at 1.

<sup>9</sup> Docket Nos. P-6995/M-21-133 and P-558, P-6995/M-22-221, Comments of LTD Broadband LLC Opposing the Opening of a Proceeding 19-20 (June 1, 2022) ("[LTD Comments](#)").

authorizes disbursement of RDOF support to the Company, and LTD receives RDOF support prior to the modified 2022 FCC Form 481 filing deadline, LTD will not be required to file an FCC Form 481 in 2022 and will not come before the Commission as part of the 2022 annual ETC certification process for RDOF purposes. Under this set of circumstances, both LTD’s assertion that the Commission should analyze the Company’s continued RDOF ETC eligibility as part of the 2022 certification process and MTA’s and MREA’s request that the Commission deny the Company’s 2022 RDOF annual ETC certification (to receive 2023 RDOF funding) would be rendered moot. Thus, if the Commission decides to analyze LTD’s continued RDOF eligibility, a separate proceeding considering whether to revoke LTD’s expanded ETC designation would better serve the Commission’s purposes.

Moreover, LTD will be required to file an FCC Form 481 as part of the 2022 annual ETC certification process to continue receiving Connect America Fund Phase II (“CAF II”) support. The fact that the Petition does not seek revocation of LTD’s ETC designation for CAF II purposes weighs in favor of analyzing the Company’s CAF II ETC recertification separately from the potential revocation of its expanded ETC designation for RDOF purposes.<sup>10</sup>

**Proposed Schedules for Proceeding.** The Commission should not adopt LTD’s proposed proceeding schedule because it directly overlaps with the OAG’s annual ETC certification review.

	July	August	September	October
Traditional Commission Schedule <sup>11</sup>	<u>July 1</u> – FCC Form 481 Filing Deadline		<u>Sept. 1</u> – Commission ETC initial comment deadline  <u>Sept. 8</u> – Commission ETC reply comment deadline  <u>Mid-Sept.</u> – Commission ETC determinations	<u>Oct. 1</u> – Commission files annual ETC certification filing with FCC and Universal Service Administrative Company (“USAC”)
OAG Traditional Schedule	<u>July 1</u> – OAG begins reviewing FCC Forms 481 and reaching out to ETCs with questions	<u>Early Aug.</u> – OAG continues reviewing FCC Forms 481 and reaching out to ETCs with questions  OAG begins drafting initial ETC comments	<u>Sept. 1</u> – OAG files comments with initial ETC recommendations  <u>Sept. 8</u> – OAG files reply comments, if necessary	
LTD-Proposed Schedule <sup>12</sup>	<u>Mid-July</u> – Pre-filed initial testimony/ statements of fact	<u>Early-Aug.</u> – responsive testimony/ briefs due in early August	<u>Mid-Sept.</u> – Commission ETC determinations	

<sup>10</sup> Docket No. P-6995/M-21-133, Petition of Minnesota Telecom Alliance and Minnesota Rural Electric Association at n.9 (May 6, 2022) (“[Petition](#)”).

<sup>11</sup> [Commission ETC Scheduling Order](#) at 1.

<sup>12</sup> [LTD Comments](#) at 21.

Additionally, if the FCC continues to push-back the filing deadline for the FCC Form 481 but requires the Commission to make its annual ETC certification recommendations to the Agency by October 1,<sup>13</sup> as usual, the FCC's revised timeline would impose significant challenges on the OAG in terms of completing its annual ETC review and recommendations by the early-September deadlines traditionally applied by the Commission.<sup>14</sup>

It is reasonable for the Commission to implement a schedule that is less expedited than the one proposed by LTD but more expedited than the schedules proposed in the Petition. The Commission should not adopt LTD's "highly expedited" schedule, however, as it could jeopardize the annual ETC certification process for all other ETCs.

**Impact of Positive and Negative FCC Decision on Any New LTD Proceeding.** The Minnesota Department of Commerce ("Department") inquired about the positive or negative impact that an FCC decision on LTD's long form could have on any new Commission proceeding.<sup>15</sup> Listed below are the possible procedural variations that could occur if the FCC issues its long-form decision while this proceeding is ongoing.

- **If the FCC Approves LTD's Long Form and the New Proceeding Is Not Complete.** If the FCC approves LTD's RDOF long-form application but the new proceeding is not complete, the Commission could notify the FCC of the proceeding and or could wait to notify the FCC of the proceeding until its conclusion. For the latter option, LTD would begin receiving RDOF disbursements from USAC and would continue receiving disbursements unless/until the Commission notifies the FCC and USAC that LTD's expanded ETC designation has been revoked.<sup>16</sup>
- **If the FCC Denies LTD's Long Form and the New Proceeding Is Not Complete.** If the FCC denies LTD's RDOF long-form application and the new proceeding is not complete, the proceeding becomes moot. Even if the Commission decides not to revoke LTD's expanded ETC designation, the Company will not receive RDOF funding, thus eliminating the need for the proceeding.<sup>17</sup>

**The Purpose of a State-Level Review Given that the FCC Is Examining the Technical, Managerial, and Financial Capabilities of LTD.** The Department asks about the purpose of a state-level review of LTD's RDOF long-form application given that the FCC is examining the technical, managerial, and financial capabilities of LTD.<sup>18</sup> In short, states can only know what

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<sup>13</sup> [47 C.F.R. § 54.314\(d\)\(1\)](#).

<sup>14</sup> [Commission ETC Scheduling Order](#) at 1.

<sup>15</sup> Docket Nos. P-6995/M-21-133 and P-558, P-6995/M-22-221, Comments of the Minnesota Department of Commerce at 8 (June 1, 2022) ("[Department Comments](#)").

<sup>16</sup> *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46, para 62 (2005) ("[I]f a state commission believes that high-cost support is being used by an ETC in a manner that is inconsistent with Section 254 of the Act, the state commission may decline to file an annual certification or may withdraw an ETC's designation, which would ensure that [federal Universal Service] funds are no longer distributed to the ETC.") ("[2005 ETC Order](#)").

<sup>17</sup> *See, e.g.*, Rural Digital Opportunity Fund Support for 2,061 Winning Bids Ready to Be Authorized; Bid Defaults Announced, AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90, [Public Notice](#), DA 22-483 at 1-2 (May 3, 2022) (demonstrating that long-forms have to be approved by the FCC for RDOF disbursements to be authorized).

<sup>18</sup> [Department Comments](#) at 8.

states know, and the FCC can only know what FCC knows. This idea is best captured by the following language from one of the FCC's federal-state partnership orders:

We believe that section 214(e)(2) demonstrates Congress's intent that *state commissions evaluate local factual situations in ETC cases and exercise discretion in reaching their conclusions regarding the public interest, convenience, and necessity*, as long as such determinations are consistent with federal and other state law. States that exercise jurisdiction over ETCs should apply these requirements in a manner that is consistent with section 214(e)(2) of the Act. Furthermore, *state commissions, as the entities most familiar with the service area for which ETC designation is sought, are particularly well-equipped to determine their own ETC eligibility requirements.*<sup>19</sup>

The Commission is authorized to request and analyze the RDOF long-form applications of LTD and other High Cost ETC's. The FCC and the Commission use the form for two different purposes. The FCC uses the form to make a decision about whether approve and authorize the disbursement of RDOF support.<sup>20</sup> The Commission uses the form to "evaluate local factual situations in ETC cases and exercise discretion in reaching their conclusions regarding the public interest, convenience and necessity."<sup>21</sup> The RDOF long-form application can help the Commission analyze through a local lens whether an ETC can comply with the requirements of Section 214(e) of the Telecommunications Act of 1996, or any other conditions imposed by the FCC or the Commission.<sup>22</sup>

Nonetheless, LTD's request for strict confidentiality provisions to protect the information in its RDOF long-form application are reasonable and should be discussed by the parties if the Commission moves forward with a proceeding.<sup>23</sup>

**LTD Mischaracterizes the OAG's ETC Revocation Statements.** LTD's comments mischaracterize the OAG's ETC revocation statements from prior RDOF proceedings. Specifically, the OAG never offered the following language as a *legal* standard for ETC revocation:

If a company refuses to recognize the Commission's authority and/or refuses to comply with the federal Universal Service protections the Commission carefully selects to advance federal Universal Service goals, it calls into question whether the company will actually use its federal Universal Service support for its intended purpose. In these situations, and provided there is sufficient evidentiary support, the Commission must be prepared to deny and/or revoke ETC designations for

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<sup>19</sup> [2005 ETC Order](#) at para 61 (emphasis added).

<sup>20</sup> *In the Matter of Rural Digital Opportunity Fund, Connect America Fund*, WC Docket Nos. 19-126 and 10-90, Report and Order, FCC 20-5, para. 86 (2020) ("[RDOF Order](#)").

<sup>21</sup> [2005 ETC Order](#) at para. 61.

<sup>22</sup> *Id.* at para. 72 ("Likewise, as the Joint Board noted, state commissions possess the authority to rescind ETC designations for failure of an ETC to comply with the requirements of section 214(e) of the Act *or any other conditions imposed by the state.*") (emphasis added).

<sup>23</sup> [LTD Comments](#) at 21.



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companies that will not recognize its authority or that refuse to comply with its ETC requirements.<sup>24</sup>

Rather, in speaking about the Commission's authority to adopt its own ETC requirements, the OAG made clear that the Commission should be prepared to deny and/or revoke ETC designations for companies that refused to recognize its RDOF jurisdiction or refused to comply with state-mandated ETC requirements. The FCC's orders—which the OAG quoted and referenced in prior RDOF filings—establish the legal standard for ETC revocation, not the OAG.<sup>25</sup>

**Pine County's "Out-of-the-Box" Solution is Creative but Cannot be Implemented by the Commission.** The OAG acknowledges Pine County's attempt to craft creative RDOF solutions. Even if the Commission decides to move forward with the LTD proceeding and determines that there is sufficient evidence to revoke the Company's expanded ETC designation, however, the Commission may not avail itself of the County's "outside the box" RDOF solution. RDOF support must be used in FCC-approved locations and pursuant to FCC RDOF requirements.<sup>26</sup> The Commission may not redirect RDOF funds to counties.<sup>27</sup>

### **Conclusion**

The OAG provides the above additional matters and points of clarification in response to points raised by other parties in initial comments. The OAG continues to recommend that the Commission initiate a proceeding to consider whether LTD is able to fulfill its RDOF obligations in Minnesota.

Sincerely,

/s/ **Kristin Berkland**

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KRISTIN BERKLAND

Assistant Attorney General

(651) 757-1236 (Voice)

(651) 296-9663 (Fax)

kristin.berkland@ag.state.mn.us

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<sup>24</sup> [LTD Comments](#) at 10 (quoting and citing the OAG's reply comments in Docket Nos. P-999/CI-21-86 et al.).

<sup>25</sup> See, e.g., *In the Matter of Bridging the Digital Divide for Low-Income Consumers et al.*, WC Docket Nos. 17- 287 et al., Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, [FCC 19-111](#), para. 28 (2019) ("States have also filtered out ineligible carriers by refusing designations to those with substandard services and weeded out bad actors by revoking designations for unlawful practices; [2005 ETC Order](#) at para. 62 ("[I]f a state commission believes that high-cost support is being used by an ETC in a manner that is inconsistent with Section 254 of the Act, the state commission may decline to file an annual certification or may withdraw an ETC's designation, which would ensure that [federal Universal Service] funds are no longer distributed to the ETC."); [2005 ETC Order](#) at para. 72 ("[A]s the Joint Board noted, state commissions possess the authority to rescind ETC designations for failure of an ETC to comply with the requirements of section 214(e) of the Act or any other conditions imposed by the state.") (emphasis added).

<sup>26</sup> See 47 C.F.R. §§ [54.802-803](#), [805-806](#).

<sup>27</sup> *Id.*

**CERTIFICATE OF SERVICE**

**Re: *In the Matter of a Petition of LTD Broadband LLC to Expand Its Designation as an Eligible Telecommunications Carrier***  
**MPUC Docket No. P-6995/M-21-133**

***In the Matter of a Petition to Initiate a Proceeding to Revoke the Expanded Eligible Telecommunications Carrier (“ETC”) Designation of LTD Broadband, LLC (“LTD”) and Deny LTD’s Funding Certification for 2023***  
**MPUC Docket No. P-558, P-6995/M-22-221**

I, JUDY SIGAL, hereby certify that on the 8th day of June, 2022, I e-filed with eDockets *a Letter of the Minnesota Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*/s/ Judy Sigal*  
\_\_\_\_\_  
JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-133_Official
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_21-133_Official
Stephen E	Coran	scoran@lermansenter.com	Lerman Senter	2001 L St NW Ste 400 Washington, DC 20036	Electronic Service	No	OFF_SL_21-133_Official
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-133_Official
Brett	Heather Freedson	bfreedson@lermansenter.com	Lerman Senter	2001 L St NW Ste 400 Washington, DC 20036	Electronic Service	No	OFF_SL_21-133_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-133_Official
Dan	Lipschultz	Dan.lipschultz@lawmoss.com	Moss & Barnett	150 South 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-133_Official
Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett	150 S 5th St Ste 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-133_Official
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 55102131	Electronic Service	Yes	OFF_SL_21-133_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-133_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_21-133_Official
Gregory	Whiteaker	greg@hermanwhiteaker.com	Herman & Whiteaker, LLC	6720B Rockledge Drive Suite 150 Bethesda, MD 20817	Electronic Service	No	OFF_SL_21-133_Official
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Paper Service	No	OFF_SL_21-133_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-133_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_22-221_M-22-221
Brent	Christensen	brentc@mnla.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_22-221_M-22-221
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_22-221_M-22-221
Stephen E	Coran	scoran@lermansenter.com	Lerman Senter	2001 L St NW Ste 400 Washington, DC 20036	Electronic Service	No	OFF_SL_22-221_M-22-221
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-221_M-22-221
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_22-221_M-22-221
Brett	Heather Freedson	bfreedson@lermansenter.com	Lerman Senter	2001 L St NW Ste 400 Washington, DC 20036	Electronic Service	No	OFF_SL_22-221_M-22-221
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-221_M-22-221
Dan	Lipschultz	Dan.lipschultz@lawmoss.com	Moss & Barnett	150 South 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-221_M-22-221
Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett	150 S 5th St Ste 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-221_M-22-221

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_22-221_M-22-221
Generic Notice	Residential Utilities Division	residential.utilities@eg.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-221_M-22-221
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-221_M-22-221
Kristopher	Twomey	kris@lakt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_22-221_M-22-221
Gregory	Whiteaker	greg@hermanwhiteaker.com	Herman & Whiteaker, LLC	6720B Rockledge Drive Suite 150 Bethesda, MD 20817	Electronic Service	No	OFF_SL_22-221_M-22-221
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Paper Service	No	OFF_SL_22-221_M-22-221
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-221_M-22-221