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June 1, 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 in response to the Minnesota Telecommunications Alliance’s (“MTA”) and Minnesota Rural Electric Association’s (“MREA”) petition requesting a proceeding to consider the revocation of LTD Broadband LLC’s (“LTD”) expanded eligible telecommunications carrier (“ETC”) designation (“Petition”), which LTD used to qualify for Rural Digital Opportunity Fund support. Oversight of ETCs to ensure that they use their federal Universal Service support solely for the provision, maintenance, and upgrading of eligible facilities and to meet their public interest obligations is a continual process. Allegations that an ETC may not be able to fulfill its federal Universal Service obligations because of a deficiency in its technical, managerial, or financial circumstances merit serious scrutiny, and it is important that interested parties—including the ETC itself—have an opportunity to analyze and respond to those allegations. Therefore, the Minnesota Public Utilities Commission (“Commission”) should grant the request for proceeding, whether on an expedited or non-expedited basis.

### **Background**

The Rural Digital Opportunity Fund (“RDOF”) is the Federal Communications Commission’s (“FCC”) most recent effort to bridge the digital divide in rural America. RDOF Phase I support will fund homes and businesses in census blocks that the FCC determines are entirely unserved by fixed voice and broadband at speeds of 25/3 Mbps.<sup>1</sup> RDOF Phase I funding

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<sup>1</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, paras. 5, 9 (2020) (“[RDOF Order](#)”).

will be disbursed over a ten-year period,<sup>2</sup> and is the federal Universal Service High Cost Program (“High Cost”) fund at issue in the Petition.

To award RDOF Phase I support, the FCC conducted a multi-step process that included the submission of a short-form application, a competitive bidding auction, and the submission of a long-form application.<sup>3</sup> To bid in the RDOF Phase I auction, interested companies were required to establish baseline financial and technical capabilities using a short-form application.<sup>4</sup> Interested companies also had to certify that, if awarded RDOF Phase I support, they have the capability to build and operate facilities “in accordance with the [RDOF] obligations and the [FCC’s] rules generally.”<sup>5</sup>

The RDOF Phase I auction was conducted as a single nationwide, multi-round reverse auction with a minimum broadband performance tier of 25/3 Mbps.<sup>6</sup> The auction was structured to prioritize bids that offered the highest speeds, most usage, and lowest latency for each area, while keeping within a \$16 billion RDOF Phase I budget.<sup>7</sup>

Auction winners submitted RDOF Phase I long-form applications to the FCC.<sup>8</sup> The long-form applications contained additional bidder qualification, financial, and network information to demonstrate that the auction winners are qualified to receive RDOF Phase I support.<sup>9</sup> The long-form applications also required auction winners to certify that they “will meet the relevant public interest obligations for each performance tier and latency combination” for which they were deemed a winning auction bidder.<sup>10</sup> If the FCC approves a winning auction bidder’s long-form application, the agency releases a public notice informing the bidder that it is authorized to receive RDOF Phase I support.<sup>11</sup>

On February 17, 2021, LTD filed a request for expansion of its ETC designation to cover those census blocks for which it was a winning bidder in the RDOF Auction.<sup>12</sup> On June 3, 2021, the Commission approved LTD’s ETC expansion request<sup>13</sup> and on September 20, 2021, Commission staff filed the 2021 Annual State Certification of Support list with the Universal

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<sup>2</sup> *Id.*, para. 7; see also [47 C.F.R. § 54.802\(b\)](#).

<sup>3</sup> [RDOF Order](#), paras. 67–113

<sup>4</sup> *Id.*, paras. 70–75.

<sup>5</sup> *Id.*, para. 84.

<sup>6</sup> *Id.*, paras. 18, 31.

<sup>7</sup> *Id.*, paras. 8, 21.

<sup>8</sup> *Id.*, para. 86. The RDOF Phase I long-form deadline was January 29, 2021. See Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021, AU Docket Nos. 20-34 et al., Public Notice, DA 20-1422, para. 16 (Dec. 7, 2020) (“[Winning Bidder Announcement](#)”).

<sup>9</sup> [RDOF Order](#), paras. 86–91.

<sup>10</sup> *Id.*, para. 89.

<sup>11</sup> [47 C.F.R. § 54.804\(b\)\(6\)\(vi\)](#).

<sup>12</sup> *In the Matter of the Petition of LTD Broadband LLC to Expand its Designation as an Eligible Telecommunications Carrier*, Docket No. P-6995/M-21-133, Petition for Expansion as an Eligible Telecommunications Carrier (Feb. 17, 2021) (eDockets [20212-171083-01](#)).

<sup>13</sup> Docket Nos. P-6995/M-21-133 and P-999/CI-21-86, ORDER APPROVING PETITION FOR ETC DESIGNATION IN CERTAIN CENSUS BLOCKS at 8-9 (June 3, 2021) (eDockets [20216-174784-02](#)).

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Service Administrative Company (“USAC”).<sup>14</sup> On May 6, 2022, the MTA and the MREA jointly submitted their Petition asking the Commission to initiate a proceeding to revoke LTD’s expanded ETC designation and deny LTD’s 2023 ETC recertification.<sup>15</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>16</sup>

### **Analysis**

The MTA and the MREA assert that newly available facts will demonstrate that LTD cannot meet its RDOF ETC commitments in Minnesota. The Notice asks whether the Commission should initiate a proceeding to determine if LTD’s expanded ETC designation should be revoked and, if a proceeding is initiated, how that proceeding should be conducted. The OAG responds below to each question in the Notice.

#### **Should the Commission initiate a proceeding to consider revoking LTD Broadband LLC expanded ETC designation and address LTD’s certification for RDOF funding in 2023?**

Yes, the Commission should grant the request for proceeding, whether on an expedited or non-expedited schedule.

Oversight of ETCs to ensure that they use their federal Universal Service support solely for the provision, maintenance, and upgrading of eligible facilities and can meet their public interest obligations is a continual process. Allegations that an ETC may not be able to fulfill its federal Universal Service obligations because of a deficiency in its technical, managerial, or financial circumstances merits serious scrutiny, and it is important that interested parties—including the ETC itself—have an opportunity to analyze and respond to those allegations.

#### **If the Commission initiates a proceeding, should the proceeding be: 1) conducted as an expedited proceeding under Minn. Stat. § 237.61; 2) referred to the Office of Administrative Hearing (OAH) for a contested case proceeding pursuant to Minn. Rule 7829.1000; or 3) should some other procedure apply?**

The OAG is not opposed to an expedited proceeding under Minn. Stat. § 237.61 but notes that the Commission could also initiate an informal or expedited proceeding under Minnesota Rules 7829.1200 and 7829.1900. Any of these procedural paths should be sufficient for purposes of examining whether LTD’s ETC status should be revoked.

If the Commission prefers a contested case proceeding under Minnesota Rule 7829.1000, the OAG is not opposed to a contested case proceeding.

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<sup>14</sup> The Commission can obtain a copy of this document by logging into the USAC website at <https://www.usac.org/> and clicking on the High Cost 54.314 Certifications option.

<sup>15</sup> Docket No. P-6995/M-21-133, Petition of MTA and MREA (May 6, 2022) (“Petition”) (eDockets [20225-185600-02](#)).

<sup>16</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](#)).

**If the Commission uses an expedited proceeding, should the Commission designate a lead Commissioner or a sub-committee of Commissioners under Minn. Stat. § 216A.03, subd. 8 or 9? Should the proceeding include a cross-examination of parties?**

The OAG is not opposed to the designation of a lead Commissioner or sub-committee of Commissioners to facilitate the proceeding, if the Commission feels it would be beneficial. Similarly, the OAG is not opposed to the cross-examination of parties if the Commission would find it helpful.

**Should the Commission adopt one of the schedules proposed by the petitioners or one of the other parties, or should it delegate scheduling to the designated lead commissioner, subcommittee of commissioners, or administrative law judge (ALJ)?**

Either of the schedules proposed by the petitioners is acceptable to the OAG, as is a proposed schedule from the Commission or an ALJ.

**Should the Commission order LTD to submit its FCC RDOF long form application to the Commission?**

Yes, the Commission should require LTD to submit the long-form application portion of its FCC Form 683 to the Commission.<sup>17</sup> The Commission should also consider requiring all RDOF ETCs to submit their FCC Form 683 long form applications to the Commission, OAG, and Minnesota Department of Commerce (“Department”) as part of the 2022 ETC certification proceeding. The concerns raised here by the MTA and MREA could be present for other previously-designated RDOF ETCs and mandatory submission of the FCC Form 683 long form applications could prevent potential compliance issues by other RDOF ETCs.

**Additional Matters and Points of Clarification**

The Notice asks if there are other issues or concerns related to this matter. The OAG addresses below some additional matters and points of clarification stemming from the Petition.

**Jurisdiction.** The OAG agrees that the Commission has the authority to initiate this proceeding and revoke LTD’s expanded ETC designation, if warranted. Contrary to footnote 24 of the Petition, however, the Commission’s federal Universal Service jurisdiction goes beyond ETC designations and annual certifications, even for wireless and interconnected Voice Over Internet Protocol (“VoIP”) ETCs. Because there is an open docket regarding the Commission’s ETC jurisdiction (Docket No. 21-86), the OAG will not discuss jurisdiction at length here. It is important to note, however, that the Commission has the authority to *oversee and monitor* an ETC’s compliance with the federal Universal Service rules and to put in place those conditions it deems necessary to ensure that an ETC fulfills its federal Universal Service obligations, as long as

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<sup>17</sup> Attachment A at 4 (“Each winning bidder is required to file a post-auction application for support, also referred to as FCC Form 683. FCC Form 683 is divided into two portions – the Divide Winning Bids portion and the long-form application portion.”). See also [47 C.F.R. § 54.804\(b\)](#) (listing long form requirements).

the conditions do not conflict with the FCC's rules.<sup>18</sup> This is demonstrated by a simple shift in emphasis in the jurisdictional language quoted by the MTA and MREA in the Petition.

We recognize the statutory role that Congress created for state commissions with respect to eligible telecommunications carrier designations, and we do not disturb that framework. We know that states share our interest in extending voice and broadband service, both fixed and mobile, where it is lacking, to better meet the needs of their consumers. Therefore, we do not seek to modify the existing authority of states to establish and monitor carrier of last resort (COLR) obligations. We will continue to rely upon states to help us determine whether universal service support is being used for its intended purposes, *including by monitoring compliance* with the new public interest obligations described in this Order.<sup>19</sup>

As explained further below, the traditional state designation role better serves section 254(b)'s policy goals by facilitating thorough state reviews of carriers seeking ETC designations, *as well as state monitoring of carriers who have received ETC designations*. This helps prevent, detect, and curb waste, fraud, and abuse in the program, which in turn promotes the efficient and responsible use of limited program funds.<sup>20</sup>

**Lack of State-Specific Rules Regarding ETC Applications.** Much of the South Dakota Public Utilities Commission's order relied on state-specific rules for ETC applications to reach its conclusion that LTD would not be able to fulfill its RDOF obligations and, consequently, that LTD's ETC designation request was not in the public interest. Although Minnesota does not have as detailed state-specific ETC designation rules as South Dakota, the Commission still has the necessary authority to revoke LTD's expanded ETC designation, if required. Federal statute and FCC rules and orders provide sufficient authority on their own for Commission revocation of an ETC designation if the FCC's High Cost criteria are not met, a designation is not in the public interest, or an ETC does not use its support solely for the provision, maintenance, and upgrading of the facilities and services for which the support is intended. Pertinent language from the federal statute and the FCC's rules and orders is provided below.

After the date on which [FCC] regulations implementing [federal Universal Service support] take effect, only an eligible telecommunications carrier designated under section 214(e) of this title shall be eligible to receive . . . Federal universal service support. A carrier that receives such support shall use that support only for

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<sup>18</sup> [47 U.S.C. § 254\(f\)](#) (“A State may adopt regulations not inconsistent with the [FCC]’s rules to preserve and advance universal service.”) The later part of section (f), which contains language referencing universal service “within that State” is not a restriction on the Commission’s jurisdiction to adopt regulations to protect federal Universal Service. Rather it is a reference to *state* universal service programs and combined with the second sentence of section (f) makes clear that regulation of *state* universal service programs is permissible as long as such state programs do not rely on or burden *federal* Universal Service programs.

<sup>19</sup> *In the Matter of Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, para. 15 (2011) (emphasis added) (“[2011 Transformation Order](#)”).

<sup>20</sup> *In the Matter of Telecommunications Carriers Eligible for Universal Service et al.*, WC Docket Nos. 17-827, 11-42, and 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111, at para. 52 (emphasis added) (“[Fifth Report and Order](#)”).

the provision, maintenance, and upgrading of facilities and services for which the support is intended. Any such support should be explicit and sufficient to achieve the purposes of this section. [47 U.S.C. § 254\(e\)](#)

A carrier that receives federal universal service support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. [47 C.F.R. § 54.7\(a\)](#)

Eligible telecommunications carriers authorized to receive high-cost support that fail to comply with public interest obligations or any other terms and conditions may be subject to further action, including . . . potential revocation of ETC designation . . . . [47 C.F.R. § 54.320\(c\)](#)

Recipients of [RDOF] support shall be subject to the compliance measures, recordkeeping requirements and audit requirements set forth in § 54.320(a)-(c). [47 C.F.R. § 54.806\(b\)](#)

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. [Fifth Report and Order](#), FCC 19-111, para. 28 (2019).

[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. [2011 Transformation Order](#), FCC 11-161, n.999 (2011).

We decline to mandate that state commissions adopt our requirements for ETC designations. Section 214(e)(2) of the Act gives states the primary responsibility to designate ETCs and prescribes that all state designation decisions must be consistent with the public interest, convenience, and necessity. 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. [2005 ETC Order](#), FCC 05-46, para 61 (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](#), FCC 05-46, para 62 (2005).

If a review of the data submitted by an ETC indicates that the ETC is no longer in compliance with the [FCC]’s criteria for ETC designation, the [FCC] may suspend support disbursements to that carrier or revoke the carrier’s designation as an ETC. 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. [2005 ETC Order](#), FCC 05-46, para 72 (2005).

**Revocation versus Revisiting Prior Order.** Because the Commission has clear authority to revoke a designation at any time if it finds that an ETC is not complying with the federal Universal Service ETC requirements, it is not strictly necessary for the Commission to revisit its LTD expanded ETC designation order. Because LTD receives both RDOF and Connect America Fund Phase II (“CAF II”) support, however, revisiting its prior order may provide the cleanest administrative path if the Commission decides to revoke LTD’s expanded ETC designation. Just as a Commission order was used to demonstrate that LTD possessed the necessary ETC designation to be eligible for RDOF support, a new or modified Commission order could be used to show revocation of that eligibility, should such revocation be necessary.<sup>21</sup>

**Designation versus Funding.** While it is correct that a state commission’s denial or revocation of an ETC designation prevents the receipt of federal Universal Service support,<sup>22</sup> state commissions do not make federal Universal Service funding decisions. The FCC has sole discretion to make funding decisions;<sup>23</sup> state commissions, on the other hand, make decisions about whether an entity seeking or possessing an ETC designation is capable of fulfilling its federal Universal Service obligations (i.e., it makes ETC designation, expansion, certification, compliance, relinquishment, and revocation determinations).

**RDOF versus Other State and Federal Funding.** If the Commission determines that LTD’s ETC expansion designation should be revoked, the RDOF Phase I support for which LTD was the winning bidder will not automatically be redistributed to other Minnesota RDOF ETCs. Rather, consistent with past FCC practice, it likely will be rolled into a new RDOF Phase I auction or into the RDOF Phase II auction.<sup>24</sup>

Nonetheless, the OAG acknowledges the importance of MTA’s and MREA’s representation that other state and federal broadband funding opportunities could be substantially limited or delayed if LTD is not able to fulfill its RDOF obligations and its expanded ETC designation is not revoked.

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<sup>21</sup> [RDOF Order](#) at para. 92 (explaining that a state order may be used to substantiate ETC designation).

<sup>22</sup> See *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) (“[2005 ETC Order](#)”).

<sup>23</sup> See, e.g., [47 C.F.R. § 54.802\(d\)](#) (ETC advised by public notice when authorized to receive RDOF support); [47 C.F.R. § 54.804\(b\)\(6\)\(v\)](#) (same as previous); Rural Digital Opportunity Fund Support for 88 Winning Bids Ready to be Authorized; Bid Defaults Announced, FCC Public Notice, [DA 22-581](#) (May 25, 2022).

<sup>24</sup> [RDOF Order](#) at para. 8 (“We adopt our proposal to establish a budget of \$20.4 billion for the Rural Digital Opportunity Fund. We also adopt our proposal to make available \$16 billion for Phase I, and to make available for Phase II a budget based on the remaining \$4.4 billion, along with any unawarded funds from Phase I.”).

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**Conclusion**

For the foregoing reasons, the Commission should initiate a proceeding to consider whether LTD is able to fulfill its federal Universal Service RDOF obligations or the Commission should revoke LTD's expanded ETC designation.

Sincerely,

/s/ **Kristin Berkland**

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**ATTACHMENT A**



**FCC Form 683**

Application for Rural Digital Opportunity  
Fund Phase I Support

Auction 904

**Instructions**

OMB Control No. 3060-1256

# RURAL DIGITAL OPPORTUNITY FUND PHASE I (AUCTION 904) LONG-FORM APPLICATION (FCC FORM 683) FILING INSTRUCTIONS

## 1. INTRODUCTION

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The Rural Digital Opportunity Fund Phase I (Auction 904) long-form application, or FCC Form 683, is designed to obtain information from long-form applicants that will be used to determine whether a long-form applicant is qualified to be authorized to receive Rural Digital Opportunity Fund auction support. Long-form applicants must provide the information detailed below and in the [Auction 904 Procedures Public Notice](#)<sup>1</sup> on FCC Form 683 in order to be authorized to receive support.

### 1.1 Filing Deadlines

Each winning bidder is required to file a post-auction application for support, also referred to as FCC Form 683. FCC Form 683 is divided into two portions – the Divide Winning Bids portion and the long-form application portion. Each winning bidder is required to file an FCC Form 683 to become authorized to receive support. Prior to completing the long-form application portion, a winning bidder may assign its winning bids among related entities. If a winning bidder apportions its winning bids among one or more related entities, those entities will be required to file the long-form application portion of an FCC Form 683 for those winning bids as described below. A winning bidder will be responsible for completing the long-form application portion of FCC Form 683 for any winning bids that it does not assign to a related entity.

The Divide Winning Bids filing window will open at 10:00 a.m. Eastern Time (ET) on Wednesday, December 9, 2020, and close at 6:00 p.m. ET on Tuesday, December 22, 2020. During this window, a winning bidder has the option of assigning each of its winning bids to related entities using the FCC Form 683. A winning bidder that wants to assign its winning bids to related entities must submit the Divide Winning Bids portion of the FCC Form 683 electronically via the Auction Application System. **The Divide Winning Bids portion of the FCC Form 683 must be submitted and confirmed prior to 6:00 p.m. ET on Tuesday, December 22, 2020.** A winning bidder that does not want to assign some or all of its winning bids to related entities need not participate in this process and may ignore this portion of FCC Form 683. A winning bidder that does not timely submit the Divide Winning Bids portion of the FCC Form 683 by this deadline will be required to complete the long-form application portion of FCC Form 683 for all its winning bids.

After the Divide Winning Bids filing window has closed and Commission staff has verified that winning bids have been assigned to permissible entities, the long-form application filing window will be opened for applicants—winning bidders that retained any of their bids, as well as all entities that are assigned winning bids by a winning bidder—to submit the long-form application portion of FCC Form 683 via the Auction Application System. This filing window will open at 10:00 a.m. ET on Thursday, January 14, 2021, and close 6:00 p.m. ET on Friday, January 29, 2021. **The long-form application portion of the FCC Form 683 must be submitted and confirmed prior to 6:00 p.m. ET on January 29,**

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<sup>1</sup> See *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, AU Docket No. 20-34, Public Notice, 35 FCC Rcd 6077 (2020) (*Auction 904 Procedures Public Notice*).

**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 1st 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 7 h 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 7 h 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