

P-999/R-88-357 ESTABLISHING A PUBLIC HEARING TO DETERMINE WHETHER RESALE OF LOCAL TELEPHONE SERVICE IS IN THE PUBLIC INTEREST, DIRECTING NORTHWESTERN BELL TO SUBMIT A COST STUDY, AND AUTHORIZING STAFF TO DRAFT RULES REGARDING SHARED TENANT SERVICES, PAY PHONE PROVIDERS AND THE RESALE OF LONG DISTANCE SERVICES

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Darrel L. Peterson	Chair
Cynthia A. Kitlinski	Commissioner
Norma McKanna	Commissioner
Robert J. O'Keefe	Commissioner
Patrice Vick	Commissioner

In the Matter of a Rulemaking by the
Minnesota Public Utilities Commission
Governing Resale and Sharing of Local
Telephone Service

ISSUE DATE: December 19, 1989

DOCKET NO. P-999/R-88-357

ORDER ESTABLISHING A PUBLIC
HEARING TO DETERMINE WHETHER
RESALE OF LOCAL TELEPHONE SERVICE
IS IN THE PUBLIC INTEREST, DIRECTING
NORTHWESTERN BELL TO SUBMIT A
COST STUDY, AND AUTHORIZING STAFF
TO DRAFT RULES REGARDING SHARED
TENANT SERVICES, PAY PHONE
PROVIDERS AND THE RESALE OF LONG
DISTANCE SERVICES

PROCEDURAL HISTORY

On March 12, 1987 Duddy Limited Partnership (Duddy) filed a petition with the Commission for a certificate of public convenience and necessity pursuant to Minn. Stat. § 237.16, subd. 4 (1986), to resell local telephone service to the tenants in its downtown Minneapolis building. The Commission found that Duddy's application raised a question of whether the resale of local telephone services should be allowed in Minnesota.

On April 29, 1987, the Commission initiated an investigation into the resale of local telephone service in Docket No. P-999/CI-87-228. The Department of Public Service (the Department) was required to submit a Report of Investigation by July 28, 1987.

Meanwhile, the Commission granted Duddy a temporary certificate until such time as the Commission reached a final decision regarding the resale of local telephone services.

The Department requested and was granted an extension to file its report by November 5, 1987. On August 1, 1987, before the Department completed its report, the Minnesota Legislature enacted a new law, Minn. Stat. § 237.68 (1987), which addressed some of the issues the Department was investigating. The Department report was submitted to the Commission on November 5, 1987. The

report revealed many of the issues involved in the sharing of local telephone service.

On July 15, 1988, the Commission decided to propose a rule governing the resale and sharing of local telephone services.

At that juncture, the Commission established the current rulemaking docket (Docket No. P-999/R-88-357) and closed Docket No. P-999/CI-87-228.

On August 1, 1988, the Commission published a Notice to Solicit Outside Information regarding the proposed rule. The Commission received comments from twenty parties.

After reviewing the comments the Commission established an Advisory Task Force consisting of 15 representatives from the various state agencies and organizations. The Commission directed Staff to gather as much information as necessary and submit a report to the Commission at the end of the Task Force sessions.

The Task Force met five times. The resulting Staff Report on the Sharing and Resale of Local Telephone Service outlined a regulatory framework for Shared Tenant Services (STS) and for the resale of local telephone service. A summary of the framework appears on pages 4 and 5 of the report and the proposed regulatory outline appears on pages 22 and 23 of the report.

On November 29, 1989, the Commission met to hear public comment on the Staff Report and to consider the recommendations contained in that report.

FINDINGS AND CONCLUSIONS

The Commission has general supervisory power over "telephone companies doing business in this state...." under Minn. Stat. Section 237.02 and has the specific duty to prescribe rules regarding the conduct of "intrastate telephone business...." Minn. Stat. Section 237.10.

The telephone services under consideration in this matter are:

1. Private shared tenant services (PSTS);
2. Resale of local telecommunications service;
3. Coin and non-coin pay phone service; and
4. Resale of long distance telecommunications service.

Providers of these services are subject to regulation by the Commission because they "furnish any telephone service to the public" and, hence, are "telephone companies" as defined in Minn. Stat. § 237.01, subd. 2 (1988):

"Telephone company" means and applies to any person, firm, association or any corporation, private or municipal, owning or operating any telephone line or telephone exchange for hire, wholly or partly within this state, or furnishing any telephone service to the public. (Emphasis added.)

Some providers of telephone service who have participated in this proceeding have argued that they are not subject to regulation by the Commission as "telephone companies" because they do not provide telephone service "to the public".

However, in Northern Natural Gas Company v. Minnesota Public Service Commission, 292 N.W.2d 759 (1980), the Minnesota Supreme Court interpreted the phrase "to or for the public" to include provision of service to even a small class of customers who had no enforceable right to demand services. More recently, the Minnesota Court of Appeals rejected Northwestern Bell's contention that it was not providing service "to the public" when it provided telephone service to "large" companies. The Court of Appeals stated:

NWB argues that ... since NWB provides its services to large subscribers (OLECs), its service is not "to the public" as is required by the statute. We cannot conclude, however, that the size of the subscribers establishes the actual character of the service by NWB. Northwestern Bell Telephone Company v. Minnesota Public Utilities Commission, 420 N.W.2d 646, 649 (Minn.App.1988)

See also PW Ventures, Inc. v. Katie Nichols, Chairman of the Florida Public Service Commission, et al., 533 So.2d 281 (Fla. 1988) in which the Florida Supreme Court held that sale of electricity to even a single customer was sale of electricity "to the public" which subjected the seller to regulation by the Florida Public Service Commission as a "public utility". PW Ventures, supra at 282.

In determining whether a provider of telephone service is a "telephone company" as defined in Minn. Stat. § 237.01, the Commission applies the analysis adopted by the Minnesota Supreme Court in Northern Natural Gas Company v. Minnesota Public Service Commission, supra at 764. In Northern, the Minnesota Supreme Court held that in the absence of a showing that an entity falls within an exception listed in the statutory definition of "public utility", an entity that furnishes natural gas at retail to direct sale customers is a public utility. Northern Natural Gas Company, supra at 764.

Applying the analysis adopted by the Minnesota Supreme Court in Northern Natural Gas Company, supra at 764 to the instant case, the statutory definition of "telephone company" contains no exception for the sharers and resellers of local telephone service, nor does Minn. Stat. § 237.68 exempt these entities from regulation as telephone companies. Absent a statutory exemption, shared tenant service providers and other resellers of local telephone service that furnish telephone service to the public are telephone companies under Minn. Stat. § 237.01, subd. 2 (1988) and are, hence, subject to regulation as telephone companies by the Commission.

Approval for the resale of local telephone service constitutes a departure from Commission's traditional regulatory approach which has generally guaranteed the local exchange company an exclusive local service area. Prior to determining what sort of regulation a telephone service should

receive, the threshold question is whether the resale of local telephone service should be allowed at all. This requires a basic public policy determination that the service in question is in the public interest.

With respect to shared tenant services, the state legislature has declared, by virtue of its enactment of Minn. Stat. § 237.68 (1988), that this particular category of local resale, the sharing of local telephone service, is in the public interest. Minn. Stat § 237.68 (1988). The Commission need make no separate public interest determination that shared tenant services are in the public interest before proceeding to propose rules governing this service. Likewise, the Commission has previously determined that the provision of coin and non-coin pay telephone service and the resale of long distance service is in the public interest. Therefore, the Commission need make no further determination that resale of long distance service and pay phone service are in the public interest before proceeding with rulemaking for these services.

However, the Commission has not ruled and Minn. Stat. § 237.68 (1988), except for the shared tenant services category of local resale, is silent on the question of resellers of local telephone service, i.e. those entities that purchase trunk lines from local exchange companies and resell telephone services to residential and/or business end users. In considering the petition of Duddy Limited Partnership for a certificate of authority to resell local telephone service, the Commission indicated that it had not previously considered the question of resale of local telephone service which involved serious public interest considerations. Prior to Duddy and consistent with the tradition of guaranteeing the local exchange company an exclusive service area, the Commission in 1984 approved a Northwestern Bell general exchange tariff which prohibits the shared use of a customer's service except under conditions established for "joint-user service". Northwestern Bell Telephone Company, General Exchange Tariff, Joint-User Service, Section 14, Original Sheet 9, Effective Date January 1, 1984. According to this tariff, the customer must specifically apply for "joint-user service" (Regulation 2) and identify the "joint users" that will share the service (Regulation 1). Most importantly, the customer is prohibited from charging the "joint users" more than the company charges him for the service (Regulation 4). This tariff, approved by the Commission and in effect since 1984, prohibits the resale of local telephone service for a profit. Northwestern Bell states that it has not filed a local resale tariff because it is awaiting the conclusion of this docket to determine if local resale will be permitted.

The Commission is not satisfied that the record before it regarding the impact of the resale of local telephone service upon the rate base and rate structure of existing local exchange companies is adequate to make an informed determination that resale of local telephone service is in the public interest.

In addition to its general statutory authority to supervise and regulate cited earlier (Minn. Stat. §§ 237.02 and 237.10), the Commission has specific authority under Minn. Stat. § 237.081 to proceed, by public hearing or otherwise, to investigate the public interest implications of the resale of local telephone service. Minn. Stat. § 237.081, Subd. 1 authorizes the Commission to investigate "any matter relating to any telephone service" whenever the Commission believes that an investigation "should for any reason be made..." Minn. Stat. § 237.081, Subd. 1.

In these circumstances, prior to any decision to proceed with rule making regarding resale of local service, the Commission will schedule a public hearing and determine whether resale of local telephone service is in the public interest. Further, to assist in providing an adequate information base for determining this important public interest issue, the Commission will require Northwestern Bell to file a study regarding the impact of resale of local telephone service and serve a copy of its study upon the persons and entities currently recognized as parties to this matter who are listed on the attached mailing list [Appendix A] within thirty (30) days of the issue date of this Order. Northwestern Bell's study should contain sufficient detail to allow evaluation of its conclusions. It should include an explanation of the methodology and reasoning employed in reaching its conclusions, along with the data relied on in reaching those conclusions.

If Northwestern Bell claims that the study or portions of it are proprietary and seeks a protective order from the Commission regarding its study or any part(s) thereof, Northwestern Bell shall file notice of such a claim and a proposed protective order with the Commission within fifteen (15) days of the issue date of this Order and serve the parties listed on the attached mailing list [Appendix A] with a copy of its notice and proposed protective order. Upon receipt of Northwestern Bell's proposed protective order, any interested party will have ten (10) days to file comments on the notice of claim and proposed protective order and may appear before the Commission when it considers the proposed protective order. Thereafter, the Commission will issue an order making the study available to any interested party consistent with Commission policy and Minnesota statutes.

Any interested party, within ninety (90) days from the date of service by Northwestern Bell upon the parties listed in Appendix A or, if Northwestern Bell seeks a protective order, pursuant to a subsequent order of the Commission, to file written comments on the study or any other aspect of the public interest question. The Commission will schedule a public hearing on the public interest issue for a date following the close of the ninety (90) day comment period and provide notice of that hearing to all parties served with this Order. Pending the public hearing and the Commission's decision on this issue, no rulemaking shall proceed on this subject.

Regarding the regulation of the other three telephone services subject to the Commission's consideration here (shared tenant services, coin and non-coin pay phone service, and resale of long distance telecommunications service), the Commission finds general support among the Advisory Task Force members for the regulatory outline proposed by Staff. The Commission notes that several objections to the Staff Report are based on the objector's disagreement with the current state of the legislation and are not properly addressed to the Commission. Others relate to rates the Commission will establish for these particular telephone services. The rules proposed for drafting herein will not address how rates will be determined or what rates should be charged by sharers and (if approved) resellers or by the local exchange companies. Minn. Stat. § 237.075 and § 237.63 (1988) will continue to govern rate setting rather than the rules proposed for drafting.

Accordingly, the Commission finds that the regulatory structure presented in the Staff Report on the Sharing and Resale of Local Telephone Service is a satisfactory guide at this stage of the rule making process. Specifically, the Commission will direct Staff to draft the requirements outlined in the Staff Report as

rules, to conduct a final meeting with the Advisory Task Force to review the proposed rules, and thereafter to present them to the Commission for proposal through the non-controversial rulemaking process.

ORDER

1. Commission Staff shall prepare draft rules consistent with the regulatory structure set out in the Staff Report on the Sharing and Resale of Local Telephone Service, conduct a final meeting of the Advisory Task Force to review the draft rules, and present draft rules to the Commission for proposal through the non-controversial rulemaking process.
2. Within thirty (30) days of the issue date of this Order, Northwestern Bell shall file a study regarding the impact of the resale of local telephone service upon its customers, operations, revenues and expenses and serve a copy of the study on all the parties listed in Appendix A of this Order. The study shall include an explanation of the methodology and reasoning used in reaching its conclusions and the data relied on to reach those conclusions.
3. In the event that Northwestern Bell claims proprietary status for its study or any part(s) thereof, Northwestern Bell shall file with the Commission a notice of proprietary claim, proposed protective order, and reasons therefore and simultaneously serve a copy of these filings upon the parties listed on Appendix A of this Order within thirty (30) days of this Order.
4. In the event that Northwestern Bell seeks a protective order regarding its study, any interested party shall:
 - a) have ten (10) days from the date that Northwestern Bell serves its proposed order to file comments on the claim of proprietary status and proposed order; and
 - b) receive notice of the meeting held by the Commission to consider Northwestern Bell's claim of proprietary status and proposed protective order.
5. Within ninety (90) days of the date that Northwestern Bell serves its study upon the parties listed in Appendix A, or in the event that Northwestern Bell seeks and obtains a protective order regarding the study, within ninety (90) days of the issue date of the Commission's protective order, any party desiring to file comments on Northwestern Bell's study or whether resale of local telephone service is in the public interest may do so.
6. This Order shall be served upon the parties listed in Appendix A and Appendix B.
7. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Lee Larson
Acting Executive Secretary

(S E A L)

APPENDIX A

In the Matter of a Rulemaking

by the Minnesota Public
Utilities Commission
Governing Resale and Sharing
of Local Telephone Service
Docket No. P999/R-88-357

Dennis Ahlers
Attorney General's Office
Residential Utilities & Small Business Div.
340 Bremer Tower
7th Place and Minnesota Street
St. Paul, MN 55101

Carol Casebolt
MN Public Utilities Commission
780 American Center Building
150 East Kellogg Boulevard
St. Paul, MN 55101 INTEROFFICE

Mark Oberlander
MN Public Utilities Commission
780 American Center Building
150 East Kellogg Boulevard
St. Paul, MN 55101 INTEROFFICE

Margie Hendriksen
Special Assistant Attorney General
780 American Center Building
150 East Kellogg Boulevard
St. Paul, MN 55101 INTEROFFICE

Linda Chavez
MN Department of Public Service
790 American Center Building
150 East Kellogg Boulevard
St. Paul, MN 55101 INTEROFFICE

Acting Executive Secretary
MN Public Utilities Commission
780 American Center Building

150 East Kellogg Boulevard
St. Paul, MN 55101 INTEROFFICE

Ben Omorogbe
MN Public Utilities Commission
790 American Center Building
150 E. Kellogg Blvd.
St. Paul, MN 55151 INTEROFFICE

Jocelyn Olson
Special Asst. Attorney General
Public Service Division
1100 Bremer Tower
7th Place and Minnesota Street
St. Paul, MN 55101

Gary R. Cunningham
Attorney General's Office
340 Bremer Tower
Seventh Place and Minnesota Streets
St. Paul, MN 55101

James Koppel
Council of Hospital Corporations
2550 University Avenue West
Suite 221 North
St. Paul, MN 55114

Duddy Limited Partnership
500 Union Plaza
333 Washington Avenue North
Minneapolis, MN 55401-1314

Minnesota Hospital Telecommunications
Rich Lindan
Gillette Children Hospital
200 East University
St. Paul, MN 55101

University of Minnesota
Steve Cawley
90 Church Street SE
Minneapolis, MN 55455

Minnesota Hotel & Motor Hotel Association
Tom Newcome

871 Jefferson
St. Paul, MN 55102

Richard J. Johnson
Moss & Barnett, P.A.
4800 Norwest Center
90 South Seventh Street
Minneapolis, MN 55402-4119

Lindquist & Vennum
Attorneys for the Minnesota
Business Utility Users Council
Bill Flynn
4200 IDS Center
Minneapolis, MN 55402-2205

Opperman & Paquin
Attorneys for Enhanced TeleManagement, Inc.
Kevin Chandler
2200 Washington Square
100 Washington Avenue South
Minneapolis, MN 55406

Northwestern Bell Telephone Company
Phil Ringgenberg
200 South 5th Street, Room A75
Minneapolis, MN 55402

Michael Nowick
Minnesota Telephone Association
386 North Wabasha Street, Suite 770
St. Paul, MN 55102

Augie Blegan
Minnesota Business Utility Users Council
P.O. Box 20163
Bloomington, MN 55420

David Steen, President
Teleplus consulting, Inc.
8000 West 78th Street #190
Edina, MN 55435

Lorelei Johnson
Union Plaza
Suite 300

333 North Washington Avenue
Minneapolis, MN 55401

Steve Krueger
Moore, Costell & Hart
1400 Norwest Center
St. Paul, MN 55101

Peter Coffey
Michael Best & Friedrich
250 East Wisconsin Ave.
Suite 200
Milwaukee, WI 53202

Fred Glynn
Centrex Telecommunications, Inc.
185 Berry, Building #4
Suite 2800
San Francisco, CA 94107

Cindy Jepson
Enchanted Telemangement, Inc.
Suite 1044, IDS Tower
80 South 8th Street
Minneapolis, MN 55402

Ace Telephone Association
David F. Freeman, Controller
207 Cedar Street East
Houston, MN 55943

Albany Mutual Telephone Association
Mr. John Rose, Manager
P.O. Box 570
Albany, MN 56307

Aircomm
Joe F. Kankovsky
5845 Blaine Avenue East
Inver Grove Heights, MN 55075

Arvig Telephone Company
Gilroy G. Arivg, President
Box 395
Pequot Lakes, MN 56472

Benton Cooperative Telephone Company
Mr. Nicholas R. Prom, General Manager
Route #1, Box 1
Hwy. 10 East
Rice, MN 56367

Blackduck Telephone Company
Herbert J. Lien, President
50 Margaret Avenue East
Blackduck, MN 56630

Blue Earth Valley Telephone Company
Mr. Neil Eckles, President
123 West 7th Street
Blue Earth, MN 56013

Bridge Water Telephone Company
Gilroy G. Arvig, President
316 Pine Street
Monticello, MN 55362

Central Telephone Company
D. J. Steele, Regulatory Manager-MN
14450 Burnhaven Drive
Burnsville, MN 55337

Clara City Telephone Company
Melvin Fuls, Secretary
Box 400
Clara City, MN 56222

Consolidated Telephone Company
Mr. William Friday, President
P.O. Box B
2410 East Oak Street
Brainerd, MN 56401

Continental Telephone Company of MN, Inc.
Sherry Banaszewski
1300 Mendota Heights Road
P.O. Box 50770
St. Paul, MN 55150

Deer River Telephone Company, Inc.
Tom Runnigen, Manager
209 2nd Street SE

Deer River, MN 56636

Deuel Telephone Cooperative Assn., Inc.
Mr. Alden R. Dorn, President
P.O. Box 637
Clear Lake, SD 57226

East Otter Tail Telephone Co.
Rick Vyskocil, Controller
160 2nd Avenue SW
Perham, MN 56573

Eckles Telephone Co.
Mr. Neil Eckles
123 West 7th Street
Blue Earth, MN 56013

Farmers Mutual Telephone Co.
Robert Hoffman, Secretary-Treasurer
P.O. Box 368
Bellingham, MN 56212

Federated Telephone Cooperative
Donald Roiland, General Manager
Chokio, MN 56221

Garden Valley Telephone Company
Mr. Lawrence C. Ware
General Manager
Erskine, MN 56535

Gardonville Cooperative Telephone Assn.
Harold Brethorst, Manager
P.O. Box 187
Brandon, MN 56315

General Telephone Company of the Midwest
J.L. Hume
State Vice President
11 - 11th Avenue
Grinnell, IA 50112

Halstad Telephone Co.
Mr. Chester Mauritsen, President
P.O. Box 55
Halstad, MN 56548

Hills Telephone Company, Inc.
K. P. Ellefson, President
P.O. Box 72
13 East 4th Avenue
Ada, MN 56510

Hohman Telephone Company
Mr. Kenneth P. Eleffson, President
P.O. Box 409
Pelican Rapids, MN 56572

Hutchinson Telephone Co.
Walter S. Clay, President
30 2nd Avenue SW
Hutchinson, MN 55350

Johnson Telephone Company
Conrad Johnson, Secretary/Treasurer
Remer, MN 56672

Kasson-Mantorville Telephone Company
Mr. John R. Tollefson, President
18 2nd Avenue NW
Kasson, MN 55944

KMP Telephone Company
Kenneth M. Peterson, President
Kerkhoven, MN 56252

Lakedale Telephone Company
L. G. Morrow, Vice President &
General Manager
Hwy. 55 East, P. O. Box 340
Annandale, MN 55302

Mabel Cooperative Telephone Co.
Harold Selness, President
214 North Main, P.O. Box 368
Mabel, MN 55954

Madelia Telephone Company
Mr. E. M. Christensen, Jr., President
104 West Main Street
Madelia, MN 56062

Mankato Citizens Telephone Company

Mr. Thoams R. Borchert, President
221 East Hickory Street, P.O. Box 3248
Mankato, MN 56001

Melrose Telephone Company
Frances Monroe, President
P.O. Box 267
210 East Main Street
Melrose, MN 56352

Mid-Communications, Inc.
Paul L. Stevens, President
221 East Hickory Street, P.O. Box 3248
Mankato, MN 56002

Mid-State Telephone Company
C.W. Ricker, Regional Manager
517 North Segoe Road
Madison WI 53705

Midwest Telephone Company
Jane A. Dorn, Secretary
Box 45
Parkers Prairie, MN 56361

New Ulm Telecom, Inc.
R.T. Rodenberg, President
400 2nd North Street
New Ulm, MN 56073

Norman County Telephone Company
K. P. Ellefson, President
Box 72, 13 East 4th Avenue
Ada, MN 56510

Park Region Mutual Telephone Company
Mr. Paul Hoff, Manager
Underwood, MN 56586

Paul Bunyan Rural Telephone Cooperative
Albert Pederson, President
Box 1596
301 American Avenue
Bemidji, MN 56601

Peoples Telephone Company of Bigfork

Orbin Holt, Secretary/Treasurer
Box 96
Bigfork, MN 56628

Pine Island Telephone Co.
Steven H. Sjogren
Vice President, Operations
Hector, MN 55342

Polar Rural Telephone Mutual Aid Corp.
Mr. Winten Gunderson, President
P.O. Box 270
Park River, ND 58270

Red River Rural Telephone Association
Mr. Clarence Packer, President
P.O. Box 136
Abercrombie, ND 58001

Redwood County Telephone Company
Lauren S. Beran, Secretary/Treasurer
120 East 3rd Street
Redwood Falls, MN 56283

Runestone Telephone Association
Mr. Clarence Ettesvold, President
P.O. Box 336
Hoffman, MN 56339

Scott-Rice Telephone Company
John W. Packer, President
4690 Colorado Street SE
Prior Lake, MN 55372

Sherburne County Rural Telephone Co.
R.K. Eddy, Vice President
440 Eagle Lake Road North
Big Lake, MN 55309

Sioux Valley Telephone Company
K. P. Ellefson, Vice President
525 4th Street
Dell Rapids, SD 57002

Sleepy Eye Telephone Company
Mr. K. P. Ellefson, Vice President

121 2nd Avenue NW
Sleepy Eye, MN 56085

Solon Springs Telephone Company
Universal Tel., Inc.
Mr. Richard P. Ausman, Treasurer
Universal Building
231 West Wisconsin Ave.
Milwaukee, WI 53203

Split Rock Telecom Cooperative, Inc.
R. M. Schreurs, Manager
612 East 3rd
Garretson, SD 57030

Twin Valley-Ulen Telephone Company
Allen R. Arvig, President
204 Main Avenue West
Twin Valley, MN 56584

Western Telephone Company
c/o New Ulm Telecom, Inc.
400 2nd North
New Ulm, MN 56073

United Telephone Company of Minnesota
Pat Jennings
Mario Kendro
Director, Governmental Affairs
1340 Norwest Center
St. Paul, MN 55101

West Central Telephone Association
Donald Sommars, President
Sebeka, MN 56477

Wikstrom Telephone Company, Inc.
Curtiss L. Wikstrom, Assistant Manager
222 South Main, P.O. Box 217
Karlstad, MN 56732

Winnebago Cooperative Telephone Assn.
Kenneth Lein, Manager
704 East Main Street
Lake Mills, IA 50450

Winsted Telephone Company
John L. Ollig, President
181 2nd Street South
Winsted, MN 55395

Woodstock Telephone Company
Bernard Knuth, President
Ruthton, MN 56170

Zumbrota Telephone Company
Susan Anderson
Zumbrota, MN 55992

Arrowhead Communications Corporation
Steven H. Sjogren
Vice President, Operations
Box 777
Hector, MN 55342

Barnesville Telephone Company
David J. Pederson, City Clerk/Treasurer
101 Front St., S.
P.O. Box 550
Barnesville, MN 56514

Cannon Valley Telecom, Inc.
Kenneth A. Johnson, President
P.O. Box 246
Bricelyn, MN 56014

Crosslake Telephone Company
Mr. Anthony V. Mayer, Manager
HC-83, Box 103
Crosslake, MN 56442

Eagle Valley Telephone Company
Steven H. Sjogren
Vice President, Financial
Box 777
Hector, MN 55342

Emily Cooperative Telephone Company
Parker W. Johnson, General Manager
P.O. Box 100
Emily, MN 56447

Felton Telephone Exchange, Inc.
Winifred Borgen, President
Felton, MN 56536

Hancock Telephone Company
Mr. Dean E. Peterson, President
Hancock, MN 56224

Harmony Telephone Company
Ken Halverson, Gen. Mgr.
35 1st Avenue NE
P.O. Box 308
Harmony, MN 55939

Home Telephone Company
Mr. Scott W. Cowan, Secretary-Treasurer
Grand Meadow, MN 55936

Lonsdale Telephone Company, Inc.
Mr. Robert J. Novak, President
P.O. Box 348
Lonsdale, MN 55046

Lowry Telephone Company
Paul Ekstrand, President
Box 133
Lowry, MN 56349

Manchester-Hartland Telephone Company
Kernal Knudson, Secretary-Treasurer
P.O. Box 57
Manchester, MN 56064

Minnesota Lake Telephone Company
Sheldon Campbell, President
Box 188
Main Street
Minnesota Lake, MN 56068

Minnesota Valley Telephone Company
S. H. Larson, President
P.O. Box 311
318 2nd Avenue East
Franklin, MN 55333

Northland Telephone Company

Carol M. Nelson, Secretary/Treasurer
P.O. Box 39
Hill City, MN 55748

Osakis Telephone Company
Jane A. Dorn, Secretary
P.O. Box 45
Parkers Prairie, MN 56361

Rock Dell Telephone Company
Jon R. Tollefson, President
18 2nd Avenue NW
Kasson, MN 55944

Rothsay Telephone Company, Inc.
Pauline Stowman, Vice President
Rothsay, MN 56579

Sacred Heart Telephone Company
Wesley C. Hanson, Manager
Sacred Heart, MN 56285

Spring Grove Coop. Telephone Company
C. C. Ike, President
166 West Main Street
Spring Grove, MN 55974

Starbuck Telephone Company
Westley C. Hanson, President
Clara City, MN 56222

Upsala Cooperative Telephone Assn.
Dennis M. Gapinski, Manager
P.O. Box 26
Upsala, MN 56384

Valley Telephone Company
George H. Revering, President
Box 27
Parkers Prairie, MN 56361

Winthrop Telephone Company
Mr. Paul Larson, Secretary/Treasurer
Winthrop, MN 55396

Wolverton Telephone Company

Millard F. Johnson, President
Box 129
Wolverton, MN 56594

Callaway Telephone Company
Walter Schweigart, Owner
Callaway, MN 56521

Chester Telephone Company
c/o Century Telephone of Wisconsin
ATTN: Debra Colgan
P.O. Box 820
LaCross, Wisc. 54602-0820

Danube Telephone Company
Albert Tepfer, President
203 Oak Street
Danube, MN 56230

Delavan Telephone Company
Edward R. Parish, President
Delavan, MN 56023

Dunnell Telephone Company, Inc.
Janet R. Nelson, Vice President
Box 42
Dunnell, MN 56127

Easton Telephone Company
Neil Eckles
Box 126
Easton, MN 56025

Granada Telephone Company
Steven H. Sjogren
*Vice President
Box 777
Hector, MN 55342

Lismore cooperative Telephone Company
Marvin T. Loosbrock, Secretary
Lismore, MN 56155

Clements Telephone Company, Inc.
Lauren Beran, President
614 E. Wyoming Street

Redwood Falls, MN 56283

Northern Telephone Company
R. G. Riddell, Owner
Box 121
Wawina, MN 55794

M. P. (Rick) Rappe
Teletech Resources Corporation
8400 Normandale Lake Blvd., Suite 350
Bloomington, MN 55437

Gena Doyscher
Enhanced Telemanagement, Inc.
IDS Center
Suite 1044
80 So. 8th Street
Minneapolis, MN 55402

St. Cloud Business Center
Larry Meyer
14-7th Avenue North
St. Cloud, MN 56303

Fairchild Communications Services Company
Stuart Meister
300 West Service Road
P.O. Box 10804
Chantilly, VA 22021-9998

Luther, Ballenthin & Carruthers
Attorneys at Law
James Ballenthin
4624 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

FirstComm
8000 W. 78th St.
Suite 190
Minneapolis, MN 55435

MN Motel Association
Al Brodie
1000 E. 146th Street
Burnsville, MN 55336

Downtown Telecom, Inc.
8000 West 78th St.
Suite 190
Minneapolis, MN 55435

Barbara Johnson
United Telephone Co.
1340 Norwest Center
55 E. 5th St.
St. Paul, MN 55101

Larry Meyer
Meyer Associates
14 Seventh Ave. North
St. Cloud, MN 56301

Minnesota Independent Payphone Assn.
Ted Fleener
18283-A Minnetonka Blvd.
Wayzata, MN 55391

Minnesota Independent Payphone Assn.
Bob Gordon
850 Decatur Avenue South
Minneapolis, MN 55427

Dorsey & Whitney Law Office
Brad Pedersen
2200 First Bank Place East
Minneapolis, MN 55402

Honeywell, Inc.
Tom Harmon
Honeywell Plaza
2701 Fourth Avenue South
Minneapolis, MN 55408

Dept. of Administration
Candace Barrick
658 Cedar Street
Centennial Office Building
Fifth Floor
INTER-OFFICE

Moss and Barnett
Michael Ahern

4800 Norwest Center
Minneapolis, Mn 55402-4119

June Dahlin
Methodist Hospital
Box 650
Minneapolis, MN 55440

Bob Albertson
2100 Shady Wood Rd.
Wayzata, MN 55391

APPENDIX B

In the Matter of a Rulemaking

by the Minnesota Public
Utilities Commission
Governing Resale and Sharing
of Local Telephone Service
Docket No. P999/R-88-357

1. Service List for Long Distance Telephone Companies

Access Plus
Bruce Nihart
401 16th Ave.
N.W., Suite E
Rochester, MN 55901

Alexandria LDTS
James Abers
Box 326
Alexandria, MN 56308

Allnet Communications Services, Inc.
Roy Morris
1990 M Street NW
Ste. 500
Washington, D.C. 20036

American Sharecom
William J. King, Controller
1300 Nicollet Mall, Suite 218
Minneapolis, MN 55403

AT&T Communications/Midwest, Inc.
Howard Bell
VP, Regulatory Regulations
10825 Old Mill Road
Omaha, NE 68154

Bemidji Long Distance Service
Mr. Gerald Tischer
P.O. Box 1477
Bemidji, MN 56601

Brainerd Telecom, Ltd.
Mr. Donald L. Dufour
1300 West Port Mall
Suite 208
Brainerd, MN 56401

Duddy Limited Partnership
500 Union Plaza
333 Washington Ave., N
Minneapolis, MN 55401

Enhanced TeleManagement, Inc.
Barb Borchardt
IDS Center, Suite 1044
Minneapolis, MN 55402

InteleCom Corporation
Corporation Trust Agent
1209 Orange St.
Wilmington, Delaware 19801

Information & Communications
Services, Inc.
Paul L. Stevens, President
221 East Hickory Street
Mankato, MN 56001

LDB Corporation
William J. Popp, President
620 Mendelssohn Ave. North, Suite 111
Golden Valley, MN 55427

LDB of Rochester, Inc.
James R. Lepore, President
201 First Ave. SW

Suite 410
Rochester, MN 55902-3130

MidAmerican Long Distance Co.
Martin E. Freidel
2918 North 72nd Street
Omaha, NB 68134

National TeleService of Winona, Inc.
John Leaf, President
123 Johnson
Winona, MN 55987

North Central Telephone Systems, Inc.
James R. Mack
119 North 5th Street
P.O. Box 5598
Fargo, ND 58105-5598

Red Wing Long Distance
Gordon Mark
603 1/2 West 3rd Street
Red Wing, MN 55066

Republic Telecom Service Corp.
Craig Sevoboda
29918 North 72nd St.
Omaha NE 68134

Rochester Telecom Systems, Inc.
Ronald L. Streyle
220 South Broadway
P.O. Box 235
Rochester, MN 55903-0235

Teleconnect
Clark McLeod, President
500 Second Avenue SE
Cedar Rapids, Iowa 52401

Telephone Associates Long
Distance Services, Inc.
Guy Sederski, Office Manager
Suite 308, Board of Trading Building
Duluth, MN 55802

U.S. Link
Greg Arvig
Pequot Lakes, MN 56472

U.S. Sprint Communications Co.
West Division
Michael Boyd, Mgr. Regulatory Affairs
1099 - 18th Street
15th floor
Denver, CO 80202

United State Transmission
Systems, Inc.
Donald A. Casey
100 Plaza Drive
Secaucus, NJ 07096

Western Union Telegraph Co.
Allen C. Hubbard
1828 L Street NW, Suite 1001
Washington, D.C. 20036

Worthington Long Distance
Gary Oberloh
1300 1/2 Second Avenue
Box 103
Worthington, MN 56187

Access Plus
Bruce Nihart
9711 Valley Biew Rd.
Eden Prairie, MN 55344

Alexandria LDTS
James Albers
221 Broadway
Alexandria, MN 56308

Brainerd Telecom LTD
Donald Dufour
1300 W. Port Mall
Suite 208
Brainerd, MN 56401

Duddy Limited Partnership
Gwen Holmes

500 Union Plaza
333 No. Washington Ave.
Minneapolis, MN 55402

Econocall
Paul Stevens, Pres.
315 So. 2nd Street
Mankato, MN 56001

International Telecharge
Fay Gibson, Katherine Averill
108 So. Akard
Dallas, TX 75202

MCI
Bobbi Ferguson
707 17th Street, Suite 4200
Denver, CO 80202

Marshall Long Distance
Gary Oberloh
East College Drive
P.O. Box 317
Marshall, MN 56528

United Long Distance of the Midwest
G.V. Head, Pres.
6666 West 100th Street
Overland Park, KS 66211

Western Union
Rich Jordanger
1 Lake Street
Upper Saddle River, NJ 07458

2. Service List for Pay Telephone

Nelson Updaw
Department of Public Service
790 American Center Bldg.
160 E. Kellogg and Robert St.
St. Paul, MN 55155

Diane Dietz
Department of Public Service
790 American Center Bldg.

160 E. Kellogg and Robert St.
St. Paul, MN 55155

Ben Omorogbe
Public Utilities Commission
780 American Center Bldg.
160 E. Kellogg and Robert St.
St. Paul, MN 55155

Jon Kingstad
Special Asst. Attorney General
Public Utilities Commission
707 American Center Bldg.
St. Paul, Minnesota 55101

Lee Larson
Acting Executive Secretary
Public Utilities Commission
780 American Center Bldg.
St. Paul, Minnesota 55101

Linda Chavez
Dept. of Public Service
790 American Center Bldg.
St. Paul, MN 55101

Ted Fleener
FMF Sales, Inc.
18283 - A Minnetonka Blvd.
Wayzata, MN 55391

c/o Micheal J. Bradley
Minnesota Independent Coalition
4800 Northwest Center
90 South Seventh Street
Minneapolis, MN 55402-4119
Tyler Corbin
4685 North Shore Drive
Orono, MN 55364

Joann D. Anderson
400 N. Robert Street
Suite 950
St. Paul, MN 55101

Gene Winstead

American Amusement & Arcades
850 DeCatur Ave. North
Golden Valley, MN 55427

Robert H. Gordon
American Amusement & Arcade
850 DeCatur Ave. North
Golden Valley, MN 55427

Doug Presson
Intellicall, Inc.
Suite 410
2155 Chenault
Carrollton, TX 75006

David Albertson
United Payphone Association
P.O. Box 388
Spring Park, MN 55384

Teleticket Business Center
Airport Business Center
Minneapolis/ St.Paul
International Airport
Twin Cities, MN 55111

Bob Albertson
Orpco Communications, Inc.
P.O. Box 407
4125 Sunset Drive
Spring Park, MN 55384

Chris Newcombe
TeleDollars
14322 21st Ave. North
Plymouth, MN 55441

Dennis Ahlers
Residential Utilities Div.
Office of the Attorney Gen.
340 Bremer Tower
St. Paul, MN 55101

Ray Hauck
Minnesota Payphones
28880 Randolph Boulevard

Randolph, MN 55066

Dave Stojevich
5628 Grand Ave.
Duluth, MN 55807

Ralph Anderson
Tel-A-Vend
RR 1, Box 19
Montevideo, MN 56265

Tonk-A-Phone, Inc.
Corporate Office
Tonk-A-Phone Bldg.
P.O. Box 388
Spring Park, MN 55384

The Restaurant
3025 West Lake Street
Minneapolis, MN 55416

Teleconnect Company
500 2nd Ave. SE
Cedar Rapids, Iowa 52401

Arnie Albrecht
Northwester Bell
200 South 5th Street
Room 3A75
Minneapolis, MN 55402

Micheal Norwick
Minnesota Telephone Assoc. Inc.
386 N. Wabasha Street #770
St. Paul, MN 55102

c/o Mike Ahern
A.M.T.U.
Moss and Barnett
4800 Norwest Center
90 So. 7th Street
Minneapolis, MN 55402

Minnesota Business Utilities Users Council
c/o William Flynn
Lindquist & Vennum

4200 IDS Center
Minneapolis, MN 55402-0041

Julie A. Leppink
Dept. of Administration
515 DOT
St. Paul, MN 55155

Norman Pink
Payphone Systems
850 Decatur
Golden Valley, MN 55427

John Simar
5440 3 Points Blvd.
Mound, MN 55364

Linda Wrzos
Northwestern Bell
200 South 5th ST.
Room 3A75
Minneapolis, MN 55402

Minnesota Independent Payphone Assn.
c/o Jim Speckman
2330 American Nat. Bank Bldg.
St. Paul, MN 55101

Bruce Rollings
Rolcomm USA, Inc.
4601 Excelsior Blvd., #301
St. Louis Park, MN 55416