

Pearce Durick PLLC

ATTORNEYS AT LAW

314 East Thayer Avenue ■ P.O. Box 400 ■ Bismarck, North Dakota 58502
T 701.223.2890 ■ F 701.223.7865 ■ www.pearce-durick.com

ZACHARY E. PELHAM

zep@pearce-durick.com

April 20, 2016



Hand Delivered

Mr. Darrell Nitschke
Executive Director
ND Public Service Commission
Capitol
600 East Boulevard, 12th Floor
Bismarck, ND 58505

RE: Midcontinent Communications Petition
PU-16-48

Dear Mr. Nitschke:

Enclosed for filing please find an original and seven copies of the following:

1. Letter dated April 18, 2016, from Mary Lohnes, Midcontinent.
2. Midcontinent's Response to North Dakota Public Service Commission's Request.
3. Midcontinent Communications' Certification Relating to Order Provisions.

By separate cover letter, and separately bound and placed in a sealed envelope labeled "TRADE SECRET – PRIVATE," is one copy of the Confidential Response to Question 3 referenced in Midcontinent's Response.

Thank you.

Sincerely,

PEARCE DURICK PLLC

ZACHARY E. PELHAM

ZEP/ak
Enclosures

12 **PU-16-48** Filed: 4/20/2016 Pages: 3
Response to April 4, 2016 letter requesting
additional information

Midcontinent Communications

Zachary Pelham, Pearce Durick, PLLC



April 18, 2016

Sara Cardwell
Public Utility Analyst
North Dakota Public Service Commission
600 East Boulevard, Dept 408
Bismarck, North Dakota 58505-0480

RE: Midcontinent Communications
Case No. PU-16-48

Dear Ms. Cardwell:

Midcontinent Communications has filed an application for Lifeline Only ETC designation in those areas serviced by Rural ILECs and where Midcontinent has its network available to consumers where economically feasible.

Please find enclosed Midcontinent's response to Staff's April 4, 2016, data request. If there are any additional questions, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mary Lohnes".

Mary Lohnes
Regulatory Affairs Manager
Midcontinent Communications
3901 N Louise Avenue
Sioux Falls, SD 57107
(605) 357-5459
Mary.Lohnes@midco.com

Cc: Zachary Pelham

Enclosures





Midcontinent Communications has filed an application for Lifeline Only ETC designation in those areas serviced by Rural ILECs and where Midcontinent has its network available to consumers where economically feasible.

Midcontinent Communications responds to the North Dakota Public Service Commission request for additional information for Lifeline Only ETC designation in Docket PU-16-48:

1. Provide all Lifeline audits and reviews the Federal Communications Commission (FCC), the Universal Service Administrative Company (USAC) and any other state commission, Lifeline administrator or any other government agency has conducted on Midcontinent's Lifeline program since 2014. The requested documents should include formal audits and limited reviews such as in-depth data validations and Payment Quality Assurance (PQA) reviews.

RESPONSE: Midcontinent has provided all required documentation for an audit that is currently being conducted on its North Dakota and Minnesota 2015 Lifeline reports. No audit results have been received; however, Midcontinent is willing to provide under a CONFIDENTIAL cover the results of the audit once it is received.

2. If the FCC has issued any citations to individuals receiving duplicate lifeline support from Midcontinent and other Lifeline providers, what processes and procedures has the Company undertaken to prevent duplicate lifeline support going forward? If applicable, please also provide copies of these processes and procedures as well as the number of citations issued.

RESPONSE: Midcontinent has had no citations for duplicate lifeline support in any of its ETC designated areas.

3. Please describe the specific procedures Midcontinent has in place to prevent waste, fraud and abuse in the Lifeline program. Include in this response copies of employee training manuals, processes and procedures as well as a discussion of the data bases Midcontinent uses. In describing the data bases, please specifically identify what data Midcontinent believes specifically helps prevent waste, fraud and abuse.

RESPONSE: Midcontinent has extensive training, process and procedures in place to prevent waste, fraud and abuse of the Lifeline program. Midcontinent provides under separate CONFIDENTIAL cover its training manuals as well as process and procedures.

4. Would Midcontinent be willing to request Lifeline participants waive any right to privacy in order that Midcontinent could periodically provide a list of customer to the Commission?

RESPONSE: Yes

5. If Midcontinent's Lifeline program has been the subject of any state or federal investigations, please provide information on the outcome of these investigations. Did any of the investigations result in Midcontinent paying fines and implementing any changes in its processes and procedures to ensure the mistakes that led to the investigation would not reoccur? If so, please specifically discuss the changes and the amount of the fines.

RESPONSE: No