

ERRATA TO THE AFFIDAVIT OF JOY GULLIKSON

The Minnesota Department of Commerce, (DOC or the Department) affiant Joy Gullikson identified three corrections to her Affidavit.

Ms. Gullikson incorrectly left a word out of paragraph 62, and did not include a copy of the response to an Information Request upon which Ms. Gullikson relied to complete her Attachment 6. To reflect the foregoing, the following corrections are made to the Affidavit of Joy Gullikson:

- ¶ 62, p.25 should be clarified by inserting the word “wireline”.

While not impossible, one can reasonably conclude that a location with no alternative wireline broadband provider is unlikely to have an alternative facilities-based provider of wireline voice services.

- Attachment 6 should reflect its source material by inserting ‘##’ into the headers for columns E and F and adding the end note:

CenturyLink Response to DOC IR No. 28 attached as Errata Attachment 13.

- Errata Attachment 13, Public and HSTS attachments should be included

service from any provider [are] eligible.³⁶ The FCC's determination of which geographic areas are unserved and eligible for CAF Phase II support is based on data provided to the FCC on Form 477.

60. CAF Phase II subsidies are available only to locations unserved by a subsidized broadband provider. The Lubeck Affidavit claims that availability of broadband is a proxy for availability of voice service—that is, that access to broadband service ensures access to voice service. Lubeck Aff. at p. 10, ¶ 15.
61. CenturyLink is eligible for substantial amounts in CAF II funds for Minnesota³⁷ and received over \$54 million for Minnesota in 2015.
62. While not impossible, one can reasonably conclude that a location with no alternative wireline broadband provider is unlikely to have an alternative facilities-based provider of wireline voice services.
63. I conclude that CenturyLink's failure to address the absence of competitive voice providers in areas for which CenturyLink has received CAF Phase II funding creates a gap in the Company's support for its Petition.

6. CENTURYLINK'S WIRELESS STUDY SHOWS THAT THE WIRELESS SERVICE IN SOME EXCHANGES IS INADEQUATE TO SUPPORT CENTURYLINK'S PETITION.

64. With reference to wireless companies' marketing/advertising maps, Mr. Brigham's Affidavit observed that it appeared that, "[a]t least two wireless carriers have complete coverage for all but a few exchange service areas in the state." Brigham

³⁶ *In the Matter of Connect America Fund ETC Annual Reports and Certifications Rural Broadband Experiments, Report and Order and FNPR* (May 26, 2016).

³⁷ FCC Press Release dated August 27, 2015.

TRADE SECRET DATA HAS BEEN REDACTED IN ITS ENTIRETY

Utility Information Request

Docket Number: P-421/AM-16-496

Date of Request: 9/26/2016

Requested From: CenturyLink

Response Due: 10/6/2016

Analysts Requesting Information: Bonnie Johnson/Diane Dietz

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
28	<p>(a) For each exchange service area, please provide the number of households where CenturyLink provides the underlying service via wholesale for:</p> <ul style="list-style-type: none">1) Resale of local service2) CenturyLink Local Service Platform3) Resale of broadband internet access service4) UNE loop <p>Please include the name of the service and the USOC of the service. Please include only those households that are not included in your responses to IRs Nos. 26 and 27 above (i.e., CenturyLink should not count the wholesale service of a household that was already included as having retail service provided by CenturyLink).</p> <p>RESPONSE:</p> <p>CenturyLink objects to this request as seeking information not reasonably calculated to lead to admissible evidence. Wholesale service is not at issue in this proceeding. Furthermore, the quantities or service identified in response to subparts 2, 3 and 4 would be sold almost exclusively to CLECs for the provision of services to business end users. Notwithstanding this objection, CenturyLink responds as follows:</p> <p>1) Please see Highly Sensitive Not Public Attachment 28A.</p>

Response by: _____ List sources of information: _____
Title: _____
Department: _____
Telephone: _____

- 2) Please see Highly Sensitive Not Public Attachment 28B.
- 3) Please see Highly Sensitive Not Public Attachment 28C.
- 4) Please see Highly Sensitive Not Public Attachment 28D.

Affidavit of Joy Gullikson
Docket No. P-421/
AM-16-496
Errata Attachment 13

Response by: _____

List sources of information:

Title: _____

Department: _____

Telephone: _____

[TRADE SECRET DATA HAS BEEN REDACTED IN ITS ENTIRETY]

[TRADE SECRET DATA HAS BEEN REDACTED IN ITS ENTIRETY]