



Dan Pecarina CEO/President
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Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E.
Suite 350
Saint Paul, MN 55101-2147

December 1, 2015

Submitted via E-Filing

Subject: Request to Compel Embarq Minnesota, Inc. dba CenturyLink to Proceed with Section 252(i)
Adoption of Interconnection Agreement

Dear Mr. Wolf:

Hiawatha Broadband Communications, Inc. (HBC) is a competitive local exchange carrier providing facilities-based local exchange and broadband services in several Minnesota exchanges. The HBC-CenturyLink interconnection agreement (ICA) approved by the Commission in Docket No. P-6267,430/IC-10-183 expired February 14, 2012. On November 9, 2015 HBC submitted its request to adopt the Hutchinson Telecommunications, Inc.-CenturyLink EQ ICA (Attachment 1). On November 23, 2015 CenturyLink responded by asserting the CLEC must first disclose where and how it wants to interconnection before it will be allowed to adopt the ICA (Attachment 2).

CenturyLink is attempting to circumvent the network disclosure terms of the HTI ICA by preemptively requiring the CLEC to disclose how and where it will interconnect before acting upon the ICA adoption request. HBC believes CenturyLink cannot place pre-conditions on HBC's choice of an interconnection agreement to be adopted pursuant to Section 252(i) of the Telecommunications Act.

HBC requests that the Commission compel CenturyLink EQ to proceed with HBC's requested ICA adoption pursuant to Section 252(i) of the Act without further delay.

If you have any questions regarding this matter please call me at 507.474.5870 or Tom Burns at 651.621.8322.

Sincerely,

/s Dan Pecarina

Dan Pecarina
Attachments: (2)

cc: Jason Topp (CenturyLink)
Tom Burns



November 9, 2015

Steve Dea
CenturyLink

via email to:
Steve.Dea@centurylink.com;
intagree@centurylink.com

Dear Steve,

Hiawatha Broadband Communications, Inc. hereby elects to adopt the interconnection agreement between Hutchinson Telecommunications, Inc. and Embarq Minnesota Inc. dated July 17, 2015 pursuant to Section 252(j) of the Telecom Act. The CenturyLink ICA Adoption form is attached.

If you have any questions or concerns please contact me at (507) 474-5870.

Sincerely,

A handwritten signature in black ink that reads 'Rochelle Pervisky'.

Rochelle Pervisky
Vice President of Regulatory

cc: Steve Givner (via email)

From: Dea, Steve [mailto:Steve.Dea@CenturyLink.com]
Sent: Monday, November 23, 2015 1:25 PM
To: Rochelle Pervisky <RPervisky@exchange.hbci.com>; Givner, Steve D <Steven.D.Givner@centurylink.com>
Subject: RE: HBC - HTI Adoption Status

Rochelle,

After internal review, as far as the adoption of the Hutchinson Telecommunications Agreement in the Embarq territory, please provide information on the specific type of interconnection services and points of interconnection that you will need. As you may be aware, the Hutchinson Traffic Exchange Agreement was the result of an arbitration decision that relied heavily on the specific network interconnection arrangements that were unique to Hutchinson. CenturyLink needs a better understanding of the specific CLEC network arrangements currently in place for Gardonville and of the interconnection request in order to determine if the costs are greater than the costs of providing it to the CLEC that originally negotiated the agreement, consistent with 47 CFR 51.809 (b)(1).

Steve Dea / Wholesale Markets / Interconnection Agreements
930 15th Street, 6th Floor / Denver, CO 80202 / 303-672-2879
steve.dea@centurylink.com



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From: Rochelle Pervisky [mailto:RPervisky@exchange.hbci.com]
Sent: Friday, November 20, 2015 2:00 PM
To: Dea, Steve; Givner, Steve D
Subject: HBC - HTI Adoption Status

Hi Steve,

HBC had sent notification of the 252 (i) HTI adoption notice to CenturyLink-Embarq, MN on November 9th. It has been more than 10 days. Please explain the delay and let me know when we will see the adoption paperwork for review and signature.

Best Regards,
Rochelle

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