



Jason D. Topp
Senior Corporate Counsel - Regulatory
(651) 312-5364

March 19, 2014

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of the Commission Investigation of the Completion of Long
Distance Calls to Rural Areas in Minnesota
MPUC Docket No. P-999/CI-12-1329**

Dear Dr. Haar:

Enclosed for filing please find CenturyLink's Reply Comments regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_12-1329_DI-12-1329
Thomas	Bailey	tbailey@briggs.com	Briggs And Morgan	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1329_DI-12-1329
Andrew	Carlson	acarlson@briggs.com	Briggs And Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1329_DI-12-1329
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_12-1329_DI-12-1329
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-1329_DI-12-1329
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_12-1329_DI-12-1329

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

**In the Matter of the Commission
Investigation of the Completion of Long
Distance Calls to Rural Areas in Minnesota**

MPUC Docket No. P999/CI-12-1329

CENTURYLINK'S REPLY COMMENTS

CenturyLink submits these Reply Comments in this docket in response to the Comments filed by a number of parties on February 17, 2014. The Commission received comments from a wide sample of industry representatives who have an interest in call completion performance. Whether the comments represent rural carriers, wireless providers, long distance carriers or other industry participants, their viewpoints are very consistent in advising caution before the Minnesota Commission imposes state level requirements on intermediate carriers. Specific points raised include:

1. The FCC has taken significant action through its recently adopted call completion rules.¹
2. The FCC rules will impose significant burdens on affected carriers.²
3. Issuing new requirements at a state level may not be effective and/or carries the potential for harm.³

¹ Integra Comments, pp. 1-2; CenturyLink Comments, pp. 2-7; AT&T Comments, pp. 2-6; MCCA Comments, pp. 2-4; MTA Comments, pp. 3-6; tw telecom Comments, pp. 1-3; Sprint Comments, pp. 1-3.

² Integra Comments, p. 4; Sprint Comments, p. 2.

³ Integra Comments, p. 4; CenturyLink Comments, pp. 9-11; AT&T Comments, pp. 2-6; MCCA Comments, p. 7; MTA Comments, pp. 8-9; Sprint Comments, p. 3.

4. If the Commission were to take state level action, such action should wait until the FCC rules have been implemented before the State of Minnesota takes action.⁴

CenturyLink agrees with these perspectives and respectfully suggests that the Commission either close this docket or delay in taking action until the FCC rules have been in effect for a year, likely in the summer of 2015.

Dated this 19th day of March, 2014.

CENTURYLINK

/s/ Jason D. Topp

Jason D. Topp
200 South Fifth Street, Room 2200
Minneapolis, MN 55402
(651) 312-5364

⁴ CenturyLink Comments, p. 9; MCCA Comments, p. 7; MTA Comments, pp. 8-9; tw telecom Comments.