



Jason D. Topp
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April 25, 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 CenturyLink, Inc. Petition for Rulemaking to Revise
Service Quality Rules
Docket No. P-421/AM-14-256**

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

Enclosure

cc: Service List

**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

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Docket No. P-421/AM-14-256**

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Dianne Barthel hereby certifies that on the 25th day of April, 2014, she e-filed a true and correct copy of CenturyLink's Reply Comments by posting it on www.edockets.state.mn.us. Said document was also served on the service list via U.S. mail and e-mail as designated with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel
Dianne Barthel

Subscribed and sworn to before me
this 25th day of April, 2014.

/s/ LeAnn M. Cammarata
Notary Public

My Commission Expires Jan 31, 2015

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_14-256_Official
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In the Matter of the CenturyLink, Inc. Docket No. P-421/AM-14-256
Petition for Rulemaking to Revise Service
Quality Rules

CENTURYLINK'S REPLY COMMENTS

CenturyLink files these reply comments in support of its request for a rulemaking. Comments filed with the Commission show general agreement that existing service quality rules are out of date and should be updated to reflect current market conditions and customer demand. These comments respond to suggestions made by the Department of Commerce and the Joint CLECs regarding the appropriate scope of a rulemaking proceeding.

DISCUSSION

While no commenter opposed moving forward with a rulemaking, the Joint CLECs seek to narrow the proceeding,¹ and the Minnesota Department of Commerce seeks to broaden the proceeding to review all of Chapter 7810.²

CenturyLink does not oppose the Department's suggestion of a broad proceeding, but is concerned that such a broad proceeding could take more time than a proceeding focused specifically on service quality. Because CenturyLink views the service quality standards as the most problematic portion of the rules, it would prefer that those standards be addressed first, before addressing other aspects of Chapter 7810.

¹ Joint CLECs Comments, pp. 5-7.

² DOC Comments, p. 3.

CenturyLink agrees with the Joint CLECs that this proceeding should focus on retail service quality. However, it strongly disagrees with the suggestions of the Joint CLECs that the Commission should exclude from consideration any standard which theoretically could impact the standard by which wholesale service quality is measured under the performance assurance plan.

The Joint CLECs' suggestion that the parity standard needs to be resolved before the retail service quality standard does not square with its advocacy in other states. Retail service quality standards vary significantly from state to state. If the retail standard were critical to setting performance assurance plan metrics, one would expect to see significant variations in the performance assurance plan measurements.

However, the wholesale performance standard for each of the measurements identified in the Joint CLECs comments vary little if at all from state to state. This is true for all of the wholesale measurements identified on the chart at pages 6-7 of the Joint CLECs comments as related to Minn. R. 7810.5800 (interruptions in service), 7810.5900 (customer trouble reports), 7810.5400 (interoffice trunks) and 7810.5500 (transmission requirements). Wholesale requirements have not been dependent upon specific retail performance standards in the past, and there is no reason for such considerations to limit the ability of this Commission to consider such issues in this proceeding.

If the Joint CLECs, the Commission or CenturyLink believe that performance assurance plan measurements need to be altered based on changes in Minnesota retail service quality standards, the plan itself provides the methodology for making such changes in Section 17.2. Addressing those issues before addressing the retail standards is akin to putting the cart before the horse.

At a minimum, the time to consider the merits of the Joint CLECs' position is during the rulemaking as opposed to before the rulemaking proceeding begins. The Commission should reject the Joint CLECs' proposal to narrow this proceeding.

CONCLUSION

CenturyLink respectfully requests that the Commission open a rulemaking proceeding to consider whether to repeal or modify Minn. R. 7810.411-7810.6100.

Dated this 25th day of April, 2014.

CENTURYLINK, INC.

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