



July 6, 2021

Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place E. #250  
St. Paul, MN 55101

Re: *In the Matter of a Petition for a Rulemaking Regarding Minnesota Rules Chapter 7810*,  
MPUC Docket No. P-421/M-21-381

Dear Mr. Seuffert,

Respectfully, the Minnesota Chamber of Commerce submits the following comments in support of CenturyLink's petition to eliminate or modify Minn. Rules 7810.5200 and 7810.5800. We appreciate the Minnesota Public Utility Commission's thoughtful consideration of this matter.

Minnesota businesses have an interest in modernizing our state's telecommunications regulation to ensure both landline customers and broadband customers are on more equal footing. Anachronistic rules from an inferior technological era that lacked today's options do not support business continuity, investment and economic growth.

Our state has taken steps toward a modern regulatory framework in the decades since the rules CenturyLink seeks to update were first adopted. This includes deregulating business customers with four or more lines since 2005.

Since that time, telephone customers have seen marked growth in voice options. Businesses and other customers have switched from wireline service to wireless, voice over internet protocol (VoIP) and other products in significant numbers. Changing consumer preferences are reflected in data from the U.S. Center for Disease Control (CDC). According to the CDC, in the first six months of 2010 just 24.9 percent of all adults lived in "wireless-only" households.<sup>1</sup> By the same period in 2020, 61.8 percent of all adults lived in "wireless-only" households.<sup>2</sup>

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<sup>1</sup> Blumberg, Luke, "[Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January – June 2010](#)," U.S. Centers for Disease Control, December 21, 2010.

<sup>2</sup> Blumberg, Luke, "[Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January-June 2020](#)," U.S. Centers for Disease Control, National Center for Health Statistics, February 2021.

The change is further reflected in Federal Communications Commission (FCC) data showing an overall drop of four million in business wireline voice connections nationally between 2013 and 2019. During that period, the FCC data also shows the transition away from wireline to VoIP service. In 2013, just 17.7 percent of business connections were VoIP; by 2019, that number more than tripled to [54.4 percent of business connections](#).<sup>3,4</sup>

Even groups once skeptical of the transition from landline service have embraced the change. In June 2021, AARP's website touted the benefits of switching away from landline service.<sup>5</sup> Per the article, *"you can switch and improve the reliability of your phone by choosing a system that combines cellular and internet access to cover you in case of an emergency. Oh, and you can save almost \$50 a month — \$560 a year — in the process"* (emphasis added).

Modernization in customer preference and comfort should be followed by modernization of our telecommunications regulations to better support business customers in a technology-neutral fashion. A broadband outage which takes offline a credit card processor is at least as likely - if not more so - to cause harm to business operations as a landline outage.

Moreover, we support CenturyLink's plea to modify the call response time requirement in Minnesota Rules 7810.5200. CenturyLink's petition demonstrates the outdated nature and arbitrariness of the 1983 rule by its reference to subsequent metrics approved by the commission and documentation of response times from government entities far exceeding what is required of private businesses.<sup>6</sup>

While the rules at issue may once have best served the public interest, they are no longer clearly the best way to serve modern customers. Now is the time to end or modify severely outdated regulations, including that which requires the mandatory prioritization of one business customer at the expense of another based on an antiquated premise.

Thank you for the opportunity to comment on this matter.

Sincerely,

/s/ Laura Bordelon  
Senior Vice President, Advocacy  
Minnesota Chamber of Commerce

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<sup>3</sup> Federal Communications Commission, "Local Telephone Competition: Status as of December 31, 2013" ([PDF](#)), October 2014.

<sup>4</sup> Federal Communications Commission, "[Voice Telephone Services: Status as of June 30, 2019](#)," April 2021.

<sup>5</sup> Quain, John, "[Is It Safe to Get Rid of Your Landline?](#)" AARP.org, August 25, 2020, last updated June 22, 2021

<sup>6</sup> Petition at 18-20.