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November 10, 2017

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of Telephone Assistance Plan (TAP) Review
Docket No. P-999/CI-17-677**

Dear Mr. Wolf:

Enclosed for filing are 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
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**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of Telephone Assistance Plan (TAP) Review **MPUC Docket No. P999/CI-17-677**

CENTURYLINK'S REPLY COMMENTS

On October 4, 2017, the Commission issued a Notice of Comment Period in Docket No. P999/CI- 17-677. In its Notice of Comment Period, the Commission asked what changes, if any, should the Commission make to the TAP benefit and/or surcharge levels and if it should use any of the TAP fund for outreach and promotion of the TAP program. The Commission also requested comments on the amounts that should be expended, preferred methods of outreach, or organizations which might assist in such outreach.

On October 25, 2017, the Legal Services Advocacy Project (LSAP) filed comments suggesting that the Commission investigate additional issues, including its perception that participation in Minnesota is much lower than participation in other states.¹ On October 31, 2017, the Minnesota Department of Commerce (“Department”) filed comments recommending that the Commission maintain current TAP credit and surcharge levels and direct members of the Taskforce of ETC stakeholders to develop responses to the last two questions.

¹ LSAP Comments 4. LSAP relies on statistics that address participation in the Federal Lifeline Program and do not address participation in state programs.

CenturyLink submits these reply comments. CenturyLink takes no position regarding the Department's recommendation to maintain current surcharge levels. It supports the Department's recommendations that questions about outreach be referred to the Taskforce. In reviewing proposed outreach alternatives, the Taskforce can also take a look at participation statistics and consider whether those statistics suggest different approaches are appropriate.

CenturyLink's quick review of differences between states with high and low Lifeline participation rates did not yield a straightforward explanation of differences in those rates. Such differences, however, are unlikely to have anything to do with wireline service. CenturyLink takes the same approach to outreach in Minnesota as it does in other states in which it offers service. Nonetheless, state-wide Lifeline participation statistics vary significantly. This disparity in results is likely because Lifeline statistics reflect very little about wireline service. The overwhelming majority of recipients of Lifeline support are wireless customers.² For example, in the first quarter of 2016, USAC reports that wireless carriers receive 89.27% of Lifeline support.³ Lifeline participation rates are therefore of little value in analyzing a state wireline program designed to support voice, rather than broadband services.

² <http://www.usac.org/li/about/process-overview/stats/historical-support-distribution.aspx> (retrieved November 9, 2017).

³ *Id.*

Nonetheless, CenturyLink supports efforts to determine whether or not more should be done to increase participation in Minnesota's TAP program. Accordingly, CenturyLink supports the recommendation that questions about appropriate outreach be referred to the Taskforce.

Dated this 10th day of November, 2017.

CENTURYLINK, INC.

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