

**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 CenturyLink, Inc.	)	Docket No. P421/AM-14-256
Petition for Rulemaking to Revise	)	
Service Quality Rules	)	

**COMMENTS OF MINNESOTA TELECOM ALLIANCE**

The Minnesota Telecom Alliance (MTA)<sup>1</sup> submits these reply comments to the Minnesota Public Utilities Commission (Commission) in response to the CenturyLink Request for Rulemaking to Modernize Service Quality Rules.

On April 2, 2014 the Public Utilities Commission (Commission) issued a Notice of Comment period in which it requested interested parties respond to topics involving the need for a rulemaking docket to examine the Commission’s service quality standards. The commission’s notice was issued in response to a petition filed by CenturyLink in which it requested a comprehensive review of the Commission’s service quality rules that no longer reflect the current marketplace.

Initial comments were submitted by parties representing a wide variety of interests. Notwithstanding the different market segments represented by the commenter’s in this docket, all voiced a consistent theme. That is, the current rules no longer reflect the needs and demands

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<sup>1</sup> The MTA is a trade association representing the interests of over 80 small, medium, and large companies that provide advanced telecommunications services, including voice, data and video to consumers throughout rural, suburban, and urban Minnesota.

of today's communications consumer. The Minnesota Telecommunications Alliance supports the request for a comprehensive rulemaking involving Minnesota Rules Chapter 7810.

Governor Dayton has asked state agencies to review their policies, rules and statutes for outdated requirements. This rulemaking request is consistent with that approach. The MTA has undertaken a legislative initiative that is more aligned with the competitive marketplace in which its 80 member companies offer communications services. A thorough evaluation of service quality rules that have their origin decades ago is consistent with the Governor's directive and the MTA's initiatives.

April 24, 2014

Respectfully submitted

**Minnesota Telecom Alliance**



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