



Dana Bailey
Director Government Affairs & Public Policy
(651) 312-5630

June 28, 2021

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

**Re: CenturyLink Response to Stillwater Township Comments
In the Matter of a Petition for a Rulemaking Regarding Minnesota Rules
Chapter 7810
Docket No. P-421/M-21-381**

Dear Mr. Seuffert:

I am writing to respond to comments submitted by representatives of Stillwater Township regarding their CenturyLink services, specifically Internet service in the Township. While we understand their frustration with the limited broadband deployment within the Township boundary, the comments submitted have little to do with voice services and the 40-year-old service quality rules that CenturyLink proposes revising. Instead, the comments appear to be an effort to leverage this docket for improving broadband services to the approximately 800 living units in the township. Such an effort is ironic, given that the rules CenturyLink seeks to change prioritize voice repair over broadband, something that was unforeseen 40 years ago.

Broadband Challenges in Stillwater Township

The primary challenges to deploying broadband in Stillwater Township are population density and terrain. According to Census data, Stillwater Township has a little more than 800 living units and a population of just over 2,000 spread across 17.5 square miles. Many of the residents live on large lots located off primary roads which further increases the cost to deploy.

CenturyLink Has Been Responsive

CenturyLink is aware of the Township's interest in broadband and has responded to requests to meet in person. CenturyLink representatives have been in contact with members of the Board Supervisors and other residents to address questions and attend a meeting. In addition, CenturyLink engineers and network planners have spent time and resources reviewing the Township footprint, identified the location of CenturyLink customers and examined the costs of building a fiber-to-the-home network within the Township. Unfortunately, what we learned was that the economics of such a build are cost prohibitive, even with a state broadband grant awarding 50 percent of the cost -- the maximum amount allowed by statute.

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Response to Comments

Commenters raised two other issues we'd like to address. First, a commenter raises anecdotal issues about voice service. Nothing in this docket will change CenturyLink's obligation to repair service when a customer is experiencing trouble. This docket is about managing the workload technicians have each day and prioritizing work in the best interest of all customers, not just the voice customer. Second, a letter writer minimizes the performance of wireless service through an anecdotal comment. It is important to note that the Commission found the Stillwater wire center to be competitive in 2016 and that test included wireless capabilities. I would also note that four of the five township supervisors list what appears to be a wireless telephone number as their primary contact on the Township website, www.stillwatertownship.com.

CenturyLink Investment in Stillwater Township

CenturyLink is making investments in the Stillwater area. CenturyLink has deployed broadband in parts of Stillwater Township through the FCC Connect America Fund (CAF) program. Through CAF and CenturyLink's own investment, 263 living units in the western portion of the township are able to receive a broadband connection. In addition to the CAF funding, another \$300,000 was spent on fiber and core projects supporting the deployment. Further, in 2021 CenturyLink has three network "rehab" projects planned for completion in Stillwater Township. The project locations are on Stonebridge Trail, Arcola Trail and Square Lake Trail. The three projects replace cable, repair splices and repair damaged pedestals that have deteriorated or been damaged and will improve voice quality in those locations.

Thank you for the opportunity to respond.

Sincerely,

/s/ Dana Bailey

DB/bardm

cc: Service List

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

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

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CERTIFICATE OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Dianne Barthel hereby certifies that on the 28th day of June, 2021, she e-filed a true and correct copy of the annexed filing by posting it on www.edockets.state.mn.us. Said document was also served on the service list via e-mail as designated with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel _____
Dianne Barthel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-381_M-21-381
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-381_M-21-381
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-381_M-21-381
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-381_M-21-381
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-381_M-21-381
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-381_M-21-381