



Jason D. Topp
Assistant General Counsel
(651) 312-5364

April 19, 2021

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

**Re: In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant
Winners
MPUC Docket No. P-999/CI-21-86**

**In the Matter of the Petition of CenturyLink Communications, LLC for
Designation as Eligible Telecommunications Carrier
MPUC Docket No. P-5096/M-21-158**

Dear Mr. Seuffert:

Enclosed for filing is CenturyLink Communications, LLC's Response to the Commission's Request for Additional Information regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

JDT/bardm

Enclosure

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

**Re: In the Matter of a Notice to Rural Digital Opportunity Fund (RDOF) Grant
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CERTIFICATE OF SERVICE

Dianne Barthel hereby certifies that on the 19th day of April, 2021, she served the annexed filing of CenturyLink on the parties identified on the filing letter, by electronic mail, directed to said addressees at their last known email addresses.

/s/ Dianne Barthel

Dianne Barthel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Buley	mbuley@otcpas.com	Olsen Thielen Co, LTD	2675 Long Lake Rd Roseville, Minnesota 55113	Electronic Service	No	OFF_SL_21-86_Official
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.	P.O. Box 920 312 Fourth Street Clear Lake, SD 57226	Electronic Service	No	OFF_SL_21-86_Official
Patrick	Caron	Patrick.Caron@cableone.biz	Cable One, Inc.	210 E Earll Dr Phoenix, AZ 85012	Electronic Service	No	OFF_SL_21-86_Official
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_21-86_Official
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_21-86_Official
Stephen E	Coran	scoran@lermanscenter.com	LermanSenter	2001 L St NW Ste 400 Washington, DC 20036	Electronic Service	No	OFF_SL_21-86_Official
Joshua	Guyan	jguyan@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
Kara	Hartman	kara.hartman@aspirenetworks.com	Aspire Networks 2, LLC	PO Box 349 Buford, GA 30515	Electronic Service	No	OFF_SL_21-86_Official
Corey	Hauer	coreyhauer@ltdbroadband.com	LTD Broadband	PO Box 3064 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_21-86_Official
Brett	Heather Freedson	bfreedson@lermansenter.com	Lerman Senter	2001 L St NW Ste 400 Washington, DC 20036	Electronic Service	No	OFF_SL_21-86_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Chris M.	Laughlin	claughlin@kelleydrye.com	Kelley Drye & Warren LLP	3050 K St NW Ste 400 Washington, DC 20007	Electronic Service	No	OFF_SL_21-86_Official
Phillip R.	Marchesiello	pmarchesiello@wbklaw.com	Wilkinson Barker Knauer, LLP	1800 M Street NW Suite 800N Washington, D.C. 20036	Electronic Service	No	OFF_SL_21-86_Official
R. Edward	Price	Ted.Price@spacex.com	Space Exploration Technologies Corp.	1155 F Street NW Ste 475 Washington, DC 20004	Electronic Service	No	OFF_SL_21-86_Official
Eric	Pyland	epyland@team.nxlink.com	AMG Technology Investment Group, LLC	d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087	Electronic Service	No	OFF_SL_21-86_Official
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_21-86_Official
Jennifer	Richter	jrichter@akingump.com	Akin Gump Strauss Hauer & Feld LLP	2001 K St. NW Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
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_21-86_Official
Kristopher	Twomey	kris@lokt.net	Law Office of Kristopher E. Twomey, P.C.	1725 I St NW Ste 300 Washington, DC 20006	Electronic Service	No	OFF_SL_21-86_Official
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-86_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Arvig	GARVIG@NEXTERA.NET	Nextera Communications	Suite 100 7115 Forthum Rd Baxter, MN 56425	Electronic Service	No	OFF_SL_21-158_M-21-158
John	Barnicle	jbarnicle@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, ste 2730 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Kyle	Bertrand	kyle.bertrand@inteliquent.com	Onvoy, LLC	550 W Adams St Ste 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	OFF_SL_21-158_M-21-158
Geoff	Bloss	gbloss@bcmone.com	BCM One Group Holdings, Inc.	7676 Forsyth Blvd Ste 2700 Saint Louis, MI 10017	Electronic Service	No	OFF_SL_21-158_M-21-158
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-158_M-21-158
Jenna	Brown	jbrown@vcomsolutions.com	QuantumShift Communications, Inc	12657 Alcosta Blvd Ste 418 San Ramon, CA 94583	Electronic Service	No	OFF_SL_21-158_M-21-158
Nicole	Byrd	nicole.byrd@att.com	AT&T Corp.	225 W Randolph St - Z1 Room 25 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Gary	Case	gary.case@verizon.com	Verizon	600 Hidden Ridge Irving, TX 75038	Electronic Service	No	OFF_SL_21-158_M-21-158
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_21-158_M-21-158

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Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-158_M-21-158
Shira	Cook	shira.cook@zayo.com	Zayo Group, LLC	1805 29th St Ste 2050 Boulder, CO 80301	Electronic Service	No	OFF_SL_21-158_M-21-158
Corbin	Coombs	cc2862@att.com	AT&T Corp.	225 West Randolph Street Z2 Room 17A140 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-158_M-21-158
Heather	Dobson	heather.dobson@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Dr St Louis, MO 63131	Electronic Service	No	OFF_SL_21-158_M-21-158
Andoni	Economou	aeconomou@mettel.net	Metropolitan Telecommunications of Minnesota, Inc.	55 Water St FL 31 New York, NY 10041	Electronic Service	No	OFF_SL_21-158_M-21-158
Carey	Gagnon	carey.gagnon@verizon.com	Verizon	3131 S Vaughn Way 5th Floor Aurora, CO 80014	Electronic Service	No	OFF_SL_21-158_M-21-158
John	Harrington	jharrington@inteliquent.com	Neutral Tandem-Minnesota	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158
Joe	Hartman	joe.hartman@acninc.com	ACN Communications Services, Inc.	1000 Progress PI NE Concord, NC 28025	Electronic Service	No	OFF_SL_21-158_M-21-158
Stacey	Hines	stacey.hines@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Drive St. Louis, Missouri 63131	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ruth	Holder	ruth.holder@bt.com	BT Communications Sales LLC	11440 Commerce Park Dr Reston, VA 20191	Electronic Service	No	OFF_SL_21-158_M-21-158
Julian	Jacquez	jjacquez@bcntele.com	BCN Telecom, Inc.	1200 Mt. Kemble Ave. 3rd Fl. Harding Township, NJ 07960	Electronic Service	No	OFF_SL_21-158_M-21-158
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-158_M-21-158
Randy	Kiesel	randy.kiesel@metronetinc.com	Metro FiberNet LLC d/b/a MetroNet	3701 Communications Way Evansville, IN 47715	Electronic Service	No	OFF_SL_21-158_M-21-158
Jim	Lundberg	jcl@velocitytelephone.com	Velocity Telephone Inc	656 Mendelsohn Ave N Golden Valley, MN 55427	Electronic Service	No	OFF_SL_21-158_M-21-158
Laurie	McDonough	laurie.mcdonough@acninc.com	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Electronic Service	No	OFF_SL_21-158_M-21-158
Sadia	Mendez	smendez@bcmone.com	BCM One, Inc.	521 5th Ave FL 14 New York, NY 10175	Electronic Service	No	OFF_SL_21-158_M-21-158
Stephen	Meradith	WCI.Minnesota.govaffairs@windstream.com	McLeod USA Telecommunications Services, LLC	Windstream Communications 4001 Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	OFF_SL_21-158_M-21-158
Richard	Monto	rmonto@inteliquent.com	Neutral Tandem-Minnesota, LLC	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Osborne	dosborne@localaccessllc.com	Local Access LLC	11442 Lake Butler Blvd Windermere, FL 34786	Electronic Service	No	OFF_SL_21-158_M-21-158
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	OFF_SL_21-158_M-21-158
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_21-158_M-21-158
Robert	Russell	brussell@dmv.com	Local Access LLC	11442 Lake Butler Boulevard Windermere, FL 34786	Electronic Service	No	OFF_SL_21-158_M-21-158
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_21-158_M-21-158
Lisa	Sichler	lsichler@bullseyetelecom.com	Bullseye Telecom	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	OFF_SL_21-158_M-21-158
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-158_M-21-158
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	OFF_SL_21-158_M-21-158
Alex	Valencia	avalencia@impacttelecom.com	Matrix Telecom, LLC	400 Las Colinas Blvd E Ste 500 Irving, TX 75039	Electronic Service	No	OFF_SL_21-158_M-21-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	OFF_SL_21-158_M-21-158
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	OFF_SL_21-158_M-21-158
Brian	Witte	bw8912@att.com	Teleport Communications America, LLC	C/O Global Connects / AT&T Corp. One AT&A Way Rm 4A252B Bedminster, NJ 07921	Electronic Service	No	OFF_SL_21-158_M-21-158

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

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
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**In the Matter of a Notice to Rural Digital
Opportunity Fund (RDOF) Grant Winners**

MPUC Docket No. P-999/CI-21-86

**In the Matter of the Petition of
CenturyLink Communications, LLC for
Designation as Eligible
Telecommunications Carrier**

MPUC Docket No. P-5096/M-21-158

**CENTURYLINK COMMUNICATIONS, LLC'S RESPONSE TO THE
COMMISSION'S REQUEST FOR ADDITIONAL INFORMATION**

CenturyLink Communications, LLC ("CLC"), pursuant to the Commission's Notice of Request for Additional Information issued April 5, 2021, provides the information requested on Attachment 1.

Dated this 19th day of April, 2021.

CENTURYLINK COMMUNICATIONS, LLC

/s/ Jason D. Topp

Jason D. Topp
200 South Fifth Street, Room 2200
Minneapolis, MN 55402
(651) 312-5364

Attachment 1

ETC Applicant Name: CenturyLink Communications, LLC
 MPUC Docket Number: P-5096/M-21-158

		Yes (Certify)/ No	Additional Information																		
1.	Please certify the applicant’s commitment to meeting the service and performance quality requirements applicable to its support type. See 47 C.F.R. § 54.202(a)(1).	Yes																			
2.	Will the applicant offer standalone voice telephony service? See 47 CFR 54.101(b). Applicants holding an ETC designation in MN should describe, in sufficient detail to understand the offering, their existing voice telephony service offered to customers, including tariff sheets and contracts, proof of making offerings for this service to consumers in their existing census blocks covered by their present ETC designation, and the number of customers using the applicant’s offered voice telephony service in both total numbers and as a percent of customers served in the state. Indicate whether the offering for the RDOF census blocks covered by this application will be the same standalone service and if not, describe how it will differ. See 47 CFR 54.101(b).	Yes	<p>Lumen operating companies provide voice service on over 306,000 lines. The voice service offerings under RDOF will not differ from what is offered elsewhere in the state where one gigabit per second internet access is available at the address. Voice service tariffs are on file with the PUC.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">mn clc loc t no 2.pdf</td> <td>CenturyLink Communications, LLC</td> </tr> <tr> <td>mn ct-ches ens t.pdf</td> <td>CenturyTel of Chester</td> </tr> <tr> <td>mn ct-mn ens t.pdf</td> <td>CenturyTel of Minnesota</td> </tr> <tr> <td>mn ct-nw-wi ens t.pdf</td> <td>CenturyTel of Northwest WI</td> </tr> <tr> <td>mn eqmn ens t.pdf</td> <td>Embarq Minnesota</td> </tr> <tr> <td>mn qc acs c.pdf</td> <td>Qwest Corporation</td> </tr> <tr> <td>mn qc acs pl no 1.pdf</td> <td>Qwest Corporation</td> </tr> <tr> <td>mn qc ens c.pdf</td> <td>Qwest Corporation</td> </tr> <tr> <td>mn qc ens t.pdf</td> <td>Qwest Corporation</td> </tr> </table>	mn clc loc t no 2.pdf	CenturyLink Communications, LLC	mn ct-ches ens t.pdf	CenturyTel of Chester	mn ct-mn ens t.pdf	CenturyTel of Minnesota	mn ct-nw-wi ens t.pdf	CenturyTel of Northwest WI	mn eqmn ens t.pdf	Embarq Minnesota	mn qc acs c.pdf	Qwest Corporation	mn qc acs pl no 1.pdf	Qwest Corporation	mn qc ens c.pdf	Qwest Corporation	mn qc ens t.pdf	Qwest Corporation
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3.	If so, will the applicant do so through its own facilities, meaning “any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support” or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier)? See 47 CFR 54.201(d)(1).	Yes	CLC will provide services through a combination of owned facilities and resale.																		

		Yes (Certify)/ No	Additional Information
4.	For the voice telephony service, identify the customer point of contact (name, address, contact information), and confirm this contact person is legally authorized to represent the applicant in communications with customers.	Yes	1-866-325-6733 or www.Lumen.com.
5.	Does the voice telephony service have "access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems"? See 47 CFR § 54.101(a).	Yes	See response to No. 2.
6.	Please describe how the applicant will remain functional in emergency situations, namely, what is "its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations." 47 CFR § 54.202(a)(2)?		CLC offers customers the option to purchase a battery back-up unit that supplies power for 24 hours in a Fiber to the Premise voice service circumstance. Central Office Buildings and some remote equipment sites are equipped with batteries and/or generators that supply power to our equipment in the event of a commercial power outage. Many paths through our network involve diverse routes which allow for protection switching of traffic onto the unaffected route in the event of a failure on a particular route. Traffic volumes on trunk groups is constantly monitored. Traffic spikes are investigated and, when within our control, corrected. Major service outages are managed per protocol and reported per federal and state rules.
7.	Please describe the extent to which the offered voice telephony services will be offered at "rates that are equal or lower to the Commission's reasonable comparability benchmarks for fixed wireline services offered in urban areas." 47 CFR 54.804(b)(2)(iii).	Yes	Rates associated with services in RDOF areas will not differ from rates associated with service offered in urban areas.
8.	Will the applicant satisfy additional requirements applicable to all high - cost ETCs, such as Lifeline obligations? 47 CFR § 54.405?	Yes	See response to No. 2.

		Yes (Certify)/ No	Additional Information
9.	If so, will the applicant commit to e-file documentation evidencing the offering of Lifeline service in the required census blocks as required by 47 CFR § 54.405(b). a. Current Lifeline providers should provide evidence of prior and current communications, including advertisements and website communications as described in 47 CFR § 54.405(c) for census blocks for which it currently receives support and the number of Lifeline customers being served. b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c).	Yes	Lumen operating companies advertise in local newspapers, telephone directories and on its website. Information related to the Lifeline program is sent to all customers annually in a Customer Rights Letter. Lumen operating companies also send out Lifeline information if and when there is a change to the program.
10.	If the answer to question 3 above is through an affiliate or by offering a managed voice solution (including VoIP) through resale of another carrier's services, identify the other carrier, describe the legal relationship between the applicant and the other carrier, and describe how the other carrier will comply with the requirements listed above.	Yes	The identity of the facilities-based carrier is yet undetermined. The resale agreement will legally bind the facilities-based carrier to the requirements of 47 C.F.R. § 54.202.
11.	Will the applicant commit to notifying the Minnesota Public Utilities Commission, Minnesota Department of Commerce and the Minnesota Office of the Attorney General if it has failed to meet its milestones for the identified census blocks under the FCC RDOF grant obligations? 47 CFR 54.320(d).	Yes	This process will be similar to the process under the CAF program.