



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

June 30, 2016

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 the Petition of CenturyLink QC to be Regulated
Pursuant to Minn. Stat. § 237.025: Competitive Market Regulation
Docket No. P-421/AM-16-496**

**Repository for “Highly Sensitive Trade Secret Information: Subject to
Additional Protection in Docket No. 16-496
Docket No. P-421/AM-16-547**

Dear Mr. Wolf:

Enclosed for filing are the following regarding the above-referenced matters:

1. Qwest Corporation dba CenturyLink QC’s Petition; and
2. Affidavit of Robert H. Brigham.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosure

cc: Service List

200 South 5th Street, Room 2200
Minneapolis, MN 55402

www.centurylink.com

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Francis X	Ahearn	fahearn@bcmone.com	McGraw Communications, Inc.	521 5th Ave Floor 14 New York, NY 10175-1200	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Marc	Alciati	malciati@inteltrace.com	Inteltrace, inc	448 Ignacio Blvd Ste 222 Novato, CA 94949	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Chris	Antoniou	christos.t.antoniou@one.verizon.com	MCImetro Access Transmission Services LLC	1320 North Court House Road Arlington, VA 22201	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Ross	Artale	rartale@spectrotel.com	Spectrotel, Inc.	3535 State Highway 66 Ste 7 Neptune, NJ 07753	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
David	Bailey	dbailey@bullseyetelecom.com	BullsEye Telecom, Inc.	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
John	Bertsch		Augeo Communications, LLC	2561 Territorial Road St. Paul, MN 55114	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kevin	Beyer	kbeyer@fedtel.net	Farmers Mutual Telephone Company	301 2nd St S Bellingham, MN 56212-1000	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kevin	Beyer	mnpucnotices@fedtel.net	Federated Telephone Cooperative	405 2nd Street East PO Box 156 Chokio, MN 56221	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Bickett	dave.bickett@parkregion.com	Otter Tail Telcom	PO Box 277 100 Main St Underwood, MN 56586	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Carl	Billek, Esq.	carl.billek@idt.net	IDT America Corp.	550 Broad St 17th Fl 520 Broad Street Newark, NJ 07102	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Mark	Birkholz	N/A	Mainstreet Communications, LLC	150 Second St. SW Perham, MN 56573	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Barb	Bornhoft	barbornhoft@nu- telcom.net	NU-Telecom	27 N Minnesota St New Ulm, MN 56073	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Barbara	Boshoven	bboshoven@ussignalcom.com	US Signal Company, L.L.C.	201 Ionia Ave SW Grand Rapids, MI 49503	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Paul	Brinkman	paulb@nesc.k12.mn.us	Northeast Service Cooperative	5525 Emerald Ave Mountain Iron, MN 55768-2068	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Johnny	Brown	BADEMAILjohnny@gzlink.net	Gazelle Link, LLC	1450 Boyson Road Bldg. C 3-A Hiawatha, IA 52233	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jenna	Brown	jbrown@vcomsolutions.com	QuantumShift Communications, Inc	12657 Alcosta Blvd Ste 418 San Ramon, CA 94583	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Mary	Buley	mary.buley@onvoy.com	Onvoy, LLC	10300 6th Ave N Plymouth, MN 55441	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Bunce	cbunce@birch.com	Ionex Communications North, Inc.	2323 Grand Blvd Ste 925 Kansas City, MO 64108	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kristin	Burton	Kristin.Burton@vastbroadband.com	Vast Broadband	104 E. Center St. Suite 201 Sikeston, MO 63801	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Tony	Cash	legal@365wireless.net	365 Wireless, LLC	1500 Trotters Cove Atlanta, GA 30338	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
William	Casto		Cellular Mobile Systems Of St. Cloud	PO Box 687 126 Division Street Waite Park, MN 563871330	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
L. Fredrik	Cederqvist	fcederqvist@att.com	AT&T Corp.	225 W Randolph St, 27C350 Chicago, IL 60606	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Austin	Chapman	Austin.Chapman@avalara.com	PNG Telecommunications, Inc.	8675 W 96th St Ste 229 Overland Park, KS 66212	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
EK	Chinwah	ek@mymti.com	Midwestern Telecommunications, Inc.	15426 S 70th Ct Orland Park, IL 60462	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Beth	Choroser	beth_choroser@comcast.com	Comcast Business Communications, Inc.	One Comcast Center, 50th Floor Philadelphia, PA 19103	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Brent	Christensen	bchristensen@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Brett	Christiansen	brett.christiansen@arvig.com	Arvig	150 Second Street SW Perham, MN 56573	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Steve	Clincy	SClincy@acninc.com	ACN Communication Services, Inc.	1000 Progress Place NE Concord, NC 28025	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Adam	Collard	adam@nswtelecom.com	NSW Telecom, Inc.	2487 South Michigan Road Eaton Rapids, MI 48827	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Geoff	Cookman	regulatory@granitenet.com	Granite Telecommunications, LLC	100 Newport Avenue Ext Quincy, MA 02171	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Interconnection	Counsel	N/A	New Cingular Wireless PCS, LLC(PARTY)	PO BOX 97061 8645 154TH AVE NERTC-1 Redmond, WA 98073-9761	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Melissa	Covert		USA Quick Phone	P.O. Box 1170 Bridgeport, TX 764261170	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Brian	Cox		BLC Management	Suite 202 11121 Highway 70 Arlington, TN 38002	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Rod	Cox	rod.cox@tdsmetro.com	TDS Metrocom	Suite 6000 525 Junction Road Madison, WI 53717	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Doka	Cullender	caudle@att.com	Teleport Communications America, LLC	6309 Boyce Ln Austin, TX 78754	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Paul	Cusack	pcusack@voxbeam.com	Voxbeam Telecommunications Inc. dba Magic Telecom	6314 Kingspointe Pkwy Ste 1 Orlando, FL 32819	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Shelia	Davenport	shelia.davenport@sprint.com	Sprint Communications Company L.P.	6450 Sprint Parkway KSOPHN0312-3A418 Overland Park, Kansas 66281	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Tina	Davis	tina.davis@level3.com	TW Telecom of Minnesota LLC	10475 Park Meadows Drive Littleton, CO 80124	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Dave	Del Zoppo	dave.d@diversicom.net	Mainstreet Communications, LLC	224 E. Main Street PO Box 100 Melrose, MN 56352	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Legal	Department	legal@granitenet.com	Granite Telecommunications LLC	100 Newport Avenue Ext. Quincy, MA 02171	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Regulatory	Department	Regulatory.dept@birch.com	Cbeyond	N/A	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Mike	Dienhart	Mike.Dienhart@uscellular.com	United States Cellular Corporation	8410 W Bryn Mawr Ave Ste 700 Chicago, IL 60631	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Shannon	Dieringer	sdieringer@firstcomm.com	First Communications LLC	3340 West Market Street Akron, OH 44333	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Gina	Dillard	gina.dillard@zayo.com	Zayo Group, LLC	400 Centennial Parkway Suite 200 Louisville, CO 80027	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Tim	Dodge	tim.dodge@clearfly.net	Greenfly Networks, Inc. dba Clearfly Communications	Clearly Communications 222 N 32nd Ste 904 Billings, MT 59104	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Andoni	Economou	aeconomou@mettel.net	Metropolitan Telecommunications of Minnesota, Inc.	55 Water St FL 31 New York, NY 10041	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Richard	Ekstrand		TLA Spectrum	P.O. Box 2000 3905 Dakota Street Southwest Alexandria, MN 56308	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Tim	Elliott	timelliott@nu-telecom.net	Hutchinson Telecommunications Inc.	421 S CSAH 34 Litchfield, MN 55355-5234	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jeffrey	Feldman	jfeldman@everestv.com	FTTH Communications L.L.C.	c/o EveresTV Two Executive Drive, Ste 635 Fort Lee, NJ 07024	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Steven	Fenker	sfenker1@earthlink.com	Nexus Communications, Inc dba Nexus-TSI	2631 Morse Rd Columbus, OH 43231-5931	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Terri	Firestein	tfireccg@myactv.net	RS Fiber Cooperative	10806 Garrison Hollow Rd Clear Spring, MD 21722	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Cynthia	Firstman	cat@airespring.com	Airespring, Inc.	6060 Sepulveda Blvd. Suite 220 Van Nuys, CA 91411	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Bryan	Fleming	bryan.fleming@t- mobile.com	T-Mobile USA, Inc.(PARTY)	12920 SE 38th St Bellevue, WA 98006	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Charles	Forst	charles.forst@zayo.com	Zayo Group, LLC	1621 18th Street Suite 100 Denver, CO 80202	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Lisa Jill	Freeman	ljfreeman@bandwidth.com	Bandwidth.com CLEC, LLC	Venture Center III - 5th Floor 900 Main Campus Drive Raleigh, NC 27606	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Alexander E	Gertsburg	agertsburg@broadvox.com	Broadvox-CLEC, LLC	75 Erieview Plaza Ste 400 Cleveland, OH 44114	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jim	Gleason	jgleason@claritycomm.net	Clarity Telecom, LLC	104 E Center St Ste 201 Sikeston, MO 63801-4108	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Linda	Gordon		BG Enterprises, Inc.	Box 3508 2347 South Avenue West Missoula, MT 59801	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jennifer	Grewe	jenniferg@wcta.net	West Central Telephone Assoc	PO Box 304 308 Frontage Rd Sebeka, MN 56477	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Linda	Groskreutz	linda.groskreutz@hickorytech.com	Crystal Communications, Inc.	221 E Hickory St Mankato, MN 56001	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Brian	Gustas	bgustas@matrixbt.com	Matrix Telecom, Inc.	433 E Las Colinas Blvd Ste 400 Irving, TX 75039	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
K.C.	Halm	kchalm@dwt.com	Davis Wright Tremaine LLP	Suite 800 1919 Pennsylvania Avenue Washington, DC 200063402	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Bruce	Hanson	N/A	Clara City Telephone Company	1700 Technology Dr Ste 100 Willmar, MN 56201	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Jarrod	Harper	jharper@broadviewnet.com	Broadview Networks Inc	1018 West 9th Ave. King Of Prussia, PA 19406	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
John	Harrington	jharrington@inteliquent.com	Neutral Tandem-Minnesota	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Randall J.	Herman	rjherman@access-com.net	Access Communications Technologies	5005 Cheshire Pkwy N Ste 1 Plymouth, MN 55446	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
James	Hickle	jim.hickle@velocitytelephone.com	Velocity Telephone Inc	4050 Olson Memorial Hwy Ste 100 Golden Valley, MN 55422	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Angela	Hoke	Angela.Hoke@birch.com	Ionex Communications North, Inc. dba Birch Communications	2323 Grand Blvd Ste 925 Kansas City, MO 64108	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Pamela	Hollick	N/A	Global Crossing Local Services, Inc.	4625 W 86th St Ste 500 Indianapolis, IN 46268	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Pamela	Hollick	N/A	Broadwing Communications, LLC	4625 W 86th St Ste 500 Indianapolis, IN 46268	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Pamela	Hollick	Pamela.Hollick@Level3.com	Level 3 Communications, LLC	4625 W. 86th Street Suite 500 Indianapolis, IN 46268	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kevin	Hopkins	khopkins@telephoneassociates.com	Telephone Associates, Inc.	329 Grand Ave Superior, WI 54880	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Huddock	N/A	Master Communications Systems	Suite 200 6130 Blue Circle Drive Minnetonka, MN 55343	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kim	Isaacs	kdisaacs@integratelecom.com	Integra Telecom, Inc.	6160 Golden Hills Dr. Golden Valley, MN 55416	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
John	Jennings	jjennings@bigrivertelephone.com	Big River Telephone Company, LLC	24 South Minnesota Avenue Cape Girardeau, MO 63702	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Bill	Jensen	bjensen@mediacomcc.com	Mediacom Minnesota LLC	PO Box 110 1504 2nd Street SE Waseca, MN 56093	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Sherry	Jergenson	sjergenson@acentek.net	Ace Link Telecommunications Inc	207 E CEDAR ST PO BOX 360 HOUSTON, MN 55943	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Laura	Kangas	lkangas@palmerwireless.com	Palmer Wireless, LLC	3127 120th Ave Clear Lake, MN 55319	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kenneth	Kapler	kkapler@vnetusa.com	Virtual Network Solutions, Inc.	Suite G 2698 Route 516 Old Bridge, NJ 8857	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Steve	Katka	skatka@albanytel.com	Albany Mutual Telephone Association	131 6th St Albany, MN 56307-8322	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Adam	King	dialupmaster@youbetnet.net	KTF Telcom Inc	P.O. Box 135 Mora, MN 55051	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Jeremy	Kissel	regulatory@globalcapacity.com	GC Pivotal, LLC	180 North LaSalle Street Suite 2430 Chicago, Illinois 60601	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Stacey A.	Klinzman		VCI Company	PO Box 98907 Lakewood, WA 984980907	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Larry	Knegendorf		Baldwin Broadband, LLC	930 Maple Street Baldwin, WI 54002	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Rex	Knowles	Rex.Knowles@xo.com	XO Communications Services, Inc.	8851 Sandy Parkway Sandy, UT 84070	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kenneth	Knuth	k.knuth@fecinc.com	Woodstock Telephone Company	337 Aetna St Ruthton, MN 56170	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jim	Kolezynski	jkolezynski@eastontelecom.com	Easton Telecom Services, L.L.C.	Summit II 3046 Brecksville Rd Richfield, OH 44286	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Ron	Kooistra	rkooistra@corp.earthlink.com	EarthLink Business, LLC (fka New Edge Network, Inc. dba EarthLink Business)	2851 Charlevoix Dr SE Grand Rapids, MI 49546	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jeff	Korn	jkorn@storesonline.com	Crexendo Business Solutions, Inc.	1303 N Research Way Orem, UT 84097	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Tim	Koxlien	tim@telequality.com	TeleQuality Communications, Inc.	21232 Gathering Oak Ste 107 San Antonio, TX 78260	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Deborah L.	Kuhn	deborah.kuhn@verizon.com	Verizon Wireless	205 N Michigan Ave FL 7 C/O VERIZON Chicago, IL 60601	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Dan	Larsen		Powercom Corportion	1807 North Center Street Beaver Dam, WI 539161031	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kevin	Larson	klarson@ctctelcom.com	Consolidated Telephone Company	PO Box 972 1102 Madison St Brainerd, MN 56401	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Bret	Lawson	bret.lawson@sprint.com	Sprint/Nextel Corp.	6450 Sprint Parkway KSOP HN0304 - 3B511 Overland Park, KS 66251	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
James W.	Lienau		New-Cell, Inc.	PO Box 19079 450 Security Blvd. Green Bay, WI 543079079	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Colleen	Lockett	regulatory@intrado.com	Intrado Communications Inc.	1601 Dry Creek Dr. Longmont, CO 80503	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Mary	Lohnes	mary_lohnes@mimi.net	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Greg	Lohrenz	gregl@aitech.net	Advanced Integrated Technologies	9855 W 78th St Ste 300 Eden Prairie, MN 55344	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Timothy	Loken	Tim.P.Loken@windstream.com	Windstream Communications, Inc.	4001 N Rodney Perham Rd Little Rock, AR 72212	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kathy	Lund	kathylund@nu-telecom.net	New Ulm Telecom, Inc. d/b/a NU-Telecom	27 North Minnesota P.O. Box 697 New Ulm, MN 56073	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Contract	Management	contract.management@witel.com	WiiTel Local Network, LLC	One Williams Center MD 29-1 Tulsa, OK 74172	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Michael	McAlister	N/A	Navigator Telecommunications, LLC	8525 Riverwood Park Drive PO Box 13860 North Little Rock, AR 72113	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Robert W.	McCausland	robert.mccausland@h3net.com	Hypercube Telecom, LLC	3200 W Pleasant Run Rd Ste 300 Lancaster, TX 75146	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Brian	McClintock	BMcClintock@ncii.com	TNCI Operating Company LLC	114 E Haley St Ste I Santa Barbara, CA 93101	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Brian	McIntyre	brian.mcintyre@dish.com	dishNET Wireline L.L.C.	9601 S. Meridian Blvd Englewood, CO 80112-5905	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Karin	Medlin	karin.e.gray@sprint.com	Sprint Spectrum L.P.	6360 Sprint Parkway Mail Stop: KSOPHE0102- 1D412 Overland Park, KS 66251	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Anthony	Mendoza	tony@mendozalawoffice.com	Mendoza Law Office, LLC	1000 University Ave Ste 222 Saint Paul, MN 55104	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Michael R.	Moore	michael.moore@charter.com	Charter Communications, Inc.	12405 Powerscourt Dr St. Louis, MO 63131	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
James	Moreno		Pacific Centrex Services, Inc.	6855 Tujunga Avenue North Hollywood, CA 91605	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Jill	Mounsey	N/A	AT&T Wireless Services, Inc.	PO Box 97061 7277 104th Ave NE Redmond, WA 980739761	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Joe	Mullin	jmullin@covista.com	Covista, Inc.	225 East 8th Street Suite 400 Chattanooga, TN 37402	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Lance	Murphy	lance.murphy@verizonwireless.com	Verizon Wireless	24242 Northwestern Hwy Southfield, MI 48075	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Glen	Nelson	regulatory@nhcgrp.com	New Horizons Communications Corp.	420 Bedford St Ste 250 Lexington, MA 02420	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Lyndall	Nipps	lyndall.nipps@windstream.com	Windstream	655 W. Broadway, Ste. 850 San Diego, CA 92101	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Lyndall	Nipps	WCI.Minnesota.govaffairs@windstream.com	McLeodUSA Telecommunications Services, LLC	655 W. Broadway Suite 850 San Diego, CA 92101	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Steve	Nisbet	snisbet@whe.org	WH Link	P.O. Box 330 6800 Electric Drive Rockford, MN 553730330	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jerry	Nussbaum	preferred@aol.com	Preferred Long Distance, Inc.	Suite 350 16830 Ventura Boulevard Encino, CA 91436	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Matt	O'Flaherty	oflaherty.matt@gmail.com	SelecTel, Inc.	1825 N Bell St Freemont, NE 68025	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Dan	Olsen	dano@windom-mn.com	City of Windom	444 9th St Windom, MN 56101-0038	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mike	Orcutt	mgorcutt@nttservices.com	Nebraska Technology & Telecommunications, In.	2308 S. 156 Circle Omaha, NE 68130	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Maryam	Ornelas	N/A	Time Warner Telecom	10475 Park Meadows Dr Littleton, CO 80124	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Doug	Osborne	dosborne@localaccessllc.com	Local Access LLC	11442 Lake Butler Blvd Windermere, FL 34786	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Sheila	Paananen	sp1484@att.com	AT&T National Access Management	26019 NE 34th St Redmond, WA 98053	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Becky	Parker	bparker@nextera.net	Nextera Communications, LLC	7115 Forthun Rd Suite 100 Baxter, MN 56425	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Mark	Pavol	regulatory@ymaxcorp.com	YMAX Communications Corp.	PO BOX 6785 West Palm Beach, FL 33404-6785	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Dan	Pecarina	dpecarina@exchange.hbci.com	Hiawatha Broadband Communications, Inc	58 Johnson St Winona, MN 55987	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Rochelle	Pervisky	RPervisky@exchange.hbci.com	Hiawatha Broadband	58 Johnson Street Winona, MN 55987	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Bonnie	Pettis	accounting@ideaone.com	IdeaOne Telecom, Inc. dba Enventis	3312 42nd St S Suite 100 Fargo, ND 58104	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Phipps	regulatory@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, Suite 2730 Chicago, IL 60606	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Marilyn	Pogreba	marilyn.pogreba@integratelcom.com	Eschelon Telecom of Minnesota, Inc.	6160 Golden Hills Dr Golden Valley, MN 55416	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
William	Punchard		Continental F.S. Communications	P.O. Box 227 702 West 1st Street Deming, NM 88030	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Lisa	Purcell	lpurcell@lightedge.com	LH Telecom, Inc.	215 10th St Ste 1000 Des Moines, IA 50309	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Brian	Rankin	brian_rankin@comcast.com	Comcast Cable Communications	1701 John F Kennedy Blvd FL 55 Philadelphia, PA 19103	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Susan	Rapinz	srapinz@broadvox.com	Cypress Communications Operating Company, LLC	75 Erieview Plaza Suite 400 Cleveland, OH 44114	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Haran	Rashes	hrashes@clearrate.com	Clear Rate Communications, Inc.	Clear Rate Communications, Inc. 555 S. Old Woodward, Suite 600 Birmingham, MI 48009	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jessica	Renneker	jrenneker@nos.com	NOS Communications, Inc.	250 Pilot Rd Ste 300 Las Vegas, NV 89119-3514	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jeff	Rhoden	jrhoden@mind.net	Prime Time Ventures, LLC	Suite 202 210 West 8th Street Medford, OR 97501	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carrie	Rice	Carrie.Rice@eventis.com	Eventis Telecom, Inc.	221 E Hickory St Mankato, MN 56001-3610	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Robert S	Rife	grodham@diversifiedconsulting.net	Broadband Dynamics, LLC	8757 E Via De Commercio FL 1 Scottsdale, AZ 85258-3359	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Paul	Riss		New Rochelle Telephone Corp.	Suite 302 75 South Broadway White Plains, NY 10601	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Emily	Roberts	emily.roberts@windstream.com	PAETEC Business Services	c/o Windstream 1450 N Center Point Rd Hiawatha, IA 52233	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
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David	Schornack	david.schornack@arvig.com	Tekstar Communications, Inc.	150 2nd St SW Perham, MN 56573	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Dave	Schultz	dschultz@paulbunyan.net	Paul Bunyan Telephone	1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kevin	Seamans	KEVIN.SEAMANS@BESTBUY.COM	BBY Networks, Inc	7601 Penn Ave. Richfield, MN 55423	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Michael	Shultz	michael.shultz@consolidated.com	Consolidated Communications	350 S Loop 336 W Conroe, TX 77304-3308	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Skogen	dskogen@gcioa.com	Global Connection Inc. of America	5555 Oakbrook Pkwy Ste 620 Norcross, GA 30093	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jeff	Slater	jeff.slater@rlec.com	RCLEC, Inc.	20 Davis Dr Belmont, CA 94002	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Jeff	Slater	N/A	Infotelecom, LLC	1950 N. Stemmons Freeway Suite 3031 Dallas, TX 75207	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
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Anna	Sokolin Maimon	amaimon@mediacomcc.com	MCC Telephony of Minnesota, LLC dba Mediacom	One Mediacom Way Mediacom Park, NY 10918	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Ane	Solkolin Malmon	N/A	Mediacom	100 Crystal Run Rd Middletown, NY 10941	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Chris	Staton	cstaton@pipertel.com	Pipertel Communications, LLC	9580 W. 14th Avenue Suite 100 Lakewood, CO 80215	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ron	Sullivan		Ygnition Networks, Inc.	Suite 201 565 Andover Park Seattle, WA 98188	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Tony	Sykora	N/A	Cellular Mobile Systems of St. Cloud LLC	PO Box 687 126 Division Street Waite Park, MN 56387-1330	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Scott	Terry	scott.a.terry@windstream.com	Windstream Lakedale, Inc.	401 Rodney Parham Road B1-F02-1221A Little Rock, AR 72212	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Joyce	Tessier	joyce.tessier@future.ca	Convergia Inc	237 Hymus Blvd Pointe-Claire, Quebec 55101 Canada	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Shirley	Thomas	shirley.thomas@orange.com	France Telecom Corporate Solutions L.L.C.	13775 McLearen Road Oak Hill, VA 20171	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Elena	Thomasson	elena.thomasson@birch.com	Cbeyond Communications, LLC dba Birch	3060 Peachtree Rd Suite 1065 Atlanta, GA 30305	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Eric	Thoreson	EricThoreson@WCTAtel.com	Winnebago Cooperative	704 E Main St. Lake Mills, Iowa 50450	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Claudia	Tiger	ctiger@bcntele.com	BCN Telecom, Inc.	1200 Mt. Kemble Ave. 3rd Fl. Harding Township, NJ 07960	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

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Jim	Walter	jwalter@702communications.com	VAL-ED Joint Venture, LLP	DbA 702 Communications 702 Main Avenue Moorhead, MN 56560	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
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Karly	Werner	karly_werner@cable.comcast.com	Comcast Phone of Minnesota, Inc.	10 River Park Plaza St. Paul, MN 55107	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Doyca	Wickham	doyca.wickham@voldelta.com	LSSI Data Corp.	1600 Stewart Ave. Suite 305 Westbury, NY 11590	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Karrie	Willis	kwillis@popp.com	POPP.com, Inc.	620 Mendelssohn Ave N Golden Valley, MN 55427	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Kristi	Woldt	N/A	Airadigm Communications, Inc.	Suite 50B 100 West College Avenue Appleton, WI 54911	Paper Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Anita	Yokiel	regulatory@hickorytech.com	Consolidated Communications	221 E Hickory Street PO Box 3248 Mankato, Minnesota 56001	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation
Christopher P	Yost	christopher.yost@zayo.com	Communications Infrastructure Investments, LLC	C/O Zayo Group 1805 29th St Boulder, CO 80301	Electronic Service	No	GEN_SL_Qwest Corporation_CTL Petition re Competitive Market Regulation

**HIGHLY SENSITIVE NOT PUBLIC/PRIVILEGED INFORMATION
CLASSIFICATION RATIONALE**

State: Minnesota

Description/Title of Information: In the Matter of the Petition of CenturyLink QC to be Regulated Pursuant to Minn. Stat. § 237.025: Competitive Market Regulation
Docket No. P-421/AM-16-496

Repository for “Highly Sensitive Trade Secret Information: Subject to Additional Protection in Docket No. 16-496
Docket No. P-421/AM-16-547

Rationale: Exhibits RHB-2, RHB-3, RHB-4, RHB-6 and RHB-8 to the Affidavit of Robert Brigham contain information that is considered Highly Sensitive Not Public because (1) CenturyLink makes reasonable efforts to ensure its privacy and (2) the data derives actual or potential independent economic value because the information is not generally known to, and not being readily ascertainable by proper means by, other persons who can obtain value from its disclosure or use. For this reason, the Exhibits RHB-2, RHB-3, RHB-4, RHB-6 and RHB-8 to the Affidavit of Robert Brigham should be protected from public disclosure.

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

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

**In the Matter of the Petition of
CenturyLink QC to be Regulated
Pursuant to Minn. Stat. § 237.025:
Competitive Market Regulation**

Docket No. P-421/AM-16-496

QWEST CORPORATION DBA CENTURYLINK QC'S PETITION

Introduction

Qwest Corporation dba CenturyLink QC ("CenturyLink QC") submits this Petition under the Competitive Market Regulation provisions in newly effective Minn. Stat. § 237.025.¹ CenturyLink QC asserts that it is entitled to such regulation in each of its 108 Minnesota exchange areas because it serves less than 50% of the households and competitors offer service to at least 60% of the households in each exchange area.

Subdivision 4 of the statute sets forth two alternate tests for declaring a wire center competitive and therefore eligible for competitive market regulation:

The commission shall approve a petition under this section if a petitioning local exchange carrier demonstrates to the commission's satisfaction that:

- (1) it serves fewer than 50 percent of the households in an exchange service area, and at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider; or
- (2) it serves more than 50 percent of the households in an exchange service area, and:

¹ CenturyLink is not at this time filing a petition for its other operating companies in Minnesota.

(i) at least 60 percent of households in the exchange service area can choose voice service from at least one additional unaffiliated competitive service provider;

(ii) no significant economic, technological, or other barriers to market entry and exit exist;

(iii) no single provider has the ability to maintain prices above competitive levels for a significant period of time or otherwise deter competition; and

(iv) the petitioning local exchange carrier will continue to offer basic local service, as defined in subdivision 8, consistent with its tariffs in effect at the time of its petition.

As this Petition will demonstrate, CenturyLink QC meets the criteria set forth in Minn. Stat. § 237.025, Subd 4(1), in every Minnesota exchange it serves because CenturyLink QC:

- Serves less than 50 percent of the households in the exchange area; and
- At least 60 percent of the households can choose voice service from at least one unaffiliated competitive service provider.

The data attached to this Petition shows that in every exchange, CenturyLink QC serves less than 40% of the customers. This information alone compels a decision by the Commission to grant the Petition because at least 60% of the customers have not only service available from a competitor but have, in fact, made the decision to purchase from them. Nonetheless, CenturyLink QC offers evidence that further supports its Petition and files all of the information required by Minn. Stat. § 237.025, Subd. 2.

PROCESS

Pursuant to subdivision 3 of the statute, a party must file an objection to this Petition within 45 days, and if no such objection is filed, the “petition is deemed approved.”² If an objection is filed, the Commission must provide interested parties and the petitioning carrier

² Minn. Stat. § 237.025, Subd. 3(b) and (c). House File 1066 was approved by the Governor on May 19, 2016. Its provisions relevant to this petition became effective the day following enactment. <https://www.revisor.mn.gov/bills/bill.php?b=house&f=hf1066&ssn=0&y=2016>.

an opportunity to comment on the petition.³ The Commission “shall make a final determination regarding a petition filed under this section within 180 days of the date all of the information required under subdivision 2 was submitted.”⁴

Because this Petition involves competitively sensitive information and in order to ensure that potential interveners have an adequate opportunity to lodge any objections to this Petition, CenturyLink filed a proposed protective order on June 28, 2016 and recommends that the Commission approve a protective order as soon as possible so that interested parties have the opportunity to review the information filed with this Petition in time to consider any potential objection they might file.

SERVICE

Consistent with the requirements of Minn. Stat. § 237.025, Subd. 2(a), this Petition has been served on the Commission, the Office of Attorney General, all telephone companies and telecommunications carriers with whom CenturyLink QC has an interconnection agreement, and all competitive service providers identified in this Petition.⁵

REQUIRED MATERIALS FOR PETITION

Minn. Stat. § 237.025, Subd. 2, sets forth the materials that must be included in a petition. These materials are attached to the affidavit of Robert Brigham (“Brigham Affidavit”). Those materials are:

- A. A list of exchange service areas in which the local exchange carrier is seeking to be regulated under this section.**

See Brigham Affidavit, Exhibit RHB-1, for a list of exchange areas.

³ Minn. Stat. § 237.025, Subd.3(d).

⁴ Minn. Stat. § 237.025, Subd. 3(e).

⁵ CenturyLink has interconnection agreements but is unable to identify current contact information for the following companies: CI2, Inc., Flatel, Inc., Telephone Express of America, Inc., Commnet Wireless, Inc., Duluth PCS Inc. (Trico Wireless), Minnesota PCS, L.P. dba Wireless North L.L.C., Newcore Wireless, LLC, Rural Cellular Corporation, Wireless Communications Venture, Backpack Software, Inc., Clertech.com, Incorporated, DSLnet Communications, LLC, and Triarch Marketing, Inc. dba Triarch Communications.

B. The local services offered by the local exchange carrier in each exchange service area;

The Brigham Affidavit, Paragraph 15, contains links to CenturyLink QC's tariffs, price lists and catalogues which list the local services the company makes available.

C. A list of competitive service providers in each exchange service area;

This list is included in the Brigham Affidavit, Paragraph 16 and Exhibits RHB-5 (wireless) and RHB-6 (Cable). As Paragraph 16 of the Brigham Affidavit explains, CenturyLink QC has identified wireless and cable providers that qualify as competitive service providers as defined in Minn. Stat. § 237.025, Subd. 1(a).

D. A description of affiliate relationships the petitioning local exchange carrier has with any provider of local service in each exchange service area;

CenturyLink QC does not have an affiliate relationship with any provider of local service that it is relying upon to demonstrate that it meets the competitive criteria in each exchange area. Brigham Affidavit, Paragraph 17. No affiliate offers residential VOIP service⁶ and any business VOIP service is provided to customers with more than three lines and is therefore irrelevant to this Petition.

E. Documentation demonstrating the local exchange carrier's loss of local voice service customers to unaffiliated competitive service providers in each exchange service area over, at a minimum, the previous five years;

CenturyLink QC has experienced significant line loss in every Minnesota Exchange since 2000. Brigham Affidavit, Paragraph 18 and Exhibit RHB-8 provide this data.

F. Evidence demonstrating that the local exchange carrier satisfies the competitive criteria under subdivision 4 in each exchange service area;

CenturyLink submits data demonstrating that "it serves fewer than 50% of the households in an exchange service area and at least 60 percent of households in the exchange

⁶ CenturyLink QC is beginning to offer residential VOIP service but did not have any customers as of December 31, 2015 – the date of the data being used in this Petition.

service area can choose voice service from at least on unaffiliated competitor.”⁷ Under the new statute, the Commission “shall approve a petition ... if the petitioning local exchange carrier demonstrates to the commission’s satisfaction”⁸ that these criteria are met.

CenturyLink offers the following data to demonstrate that it meets these standards.

1. CenturyLink QC serves less than 50% of households in each Exchange Service Area

The Brigham Affidavit, Paragraphs 5 through 7 and Exhibit RHB-2 demonstrate that CenturyLink serves less than 50% of the households in each Exchange Service Area.

One wrinkle associated with this Petition is the manner in which business customers purchasing three or less lines should be analyzed. The statute appears to exclude such data in its competitive criteria because its test analyzes the percentage of “households” served in each exchange area. However, even if one includes businesses purchasing three or fewer lines, CenturyLink serves less than 50% of such customers.

CenturyLink QC has data regarding the number of such customers that it serves. However the census bureau does not provide data identifying the total number of businesses purchasing three or fewer lines. In order to address this issue, Mr. Brigham has assumed that CenturyLink has 100% market share for such customers. Brigham Affidavit, Paragraph 7. Even with that assumption – which clearly overstates CenturyLink QC’s market share, CenturyLink still serves less than 50% of the households in each Exchange Service Area. Brigham Affidavit, Paragraph 7 and Exhibit RHB-3.

2. More than 60% of households have service available from a Competitive Service Provider.

Conclusive evidence also establishes that competitive service providers offer service to 60% or more of the households in each exchange service area. Brigham Affidavit,

⁷ Minn. Stat. § 237.025, Subd. 4(1) (2016).

⁸ Minn. Stat. § 237.025, Subd. 4 (2016).

Paragraph 9, and Exhibits RHB-2 and RHB-4 demonstrate that at least 60% of customers in every exchange service area *actually receive* service from a competitive service provider with the exception of one exchange – and there the percentage is 59.6%. If such a high percentage of customers actually receive service elsewhere, it is obvious that at least 60% of customers have service available and this criteria is met.

This conclusion is bolstered by wireless coverage maps discussed in Brigham Affidavit, Paragraph 10, and Exhibit RHB-5 that demonstrate wireless service is available to over 60% of customers in each exchange. Because wireless providers are specifically defined as Competitive Service Providers in statute⁹ wireless coverage alone demonstrates that the 60% threshold has been met.

CenturyLink QC further provides data regarding service offered by cable providers in Minnesota. Cable providers qualify as competitive service providers under Minn. Stat. § 237.025, Subd (1)(a)(2) because cable providers “own a substantial proportion of the last mile loop facilities delivering service to a majority of households in an exchange service area.”¹⁰ Brigham Affidavit, Paragraphs 11-13 and Exhibit RHB-6, discusses this data and provides estimates from the leading provider of market share information in the industry for each wire center.

G. Other information requested by the commission that is relevant to the applicable competitive criteria under subdivision 4.

CenturyLink QC is unaware is unaware of any Commission request that additional information be filed with this Petition. CenturyLink QC stands ready and willing to provide additional information necessary for the Commission or interested parties to review the merits of this Petition through discovery responses.

⁹ Minn. Stat. § 237.025, Subd. 1(a)(1) (2016).

¹⁰ Minn. Stat. § 237.025, Subd. 1(a)(2) (2016), Brigham Affidavit, Paragraph 11 (describing cable company ownership of last mile loop facilities).

CONCLUSION

Qwest Corporation dba CenturyLink QC respectfully requests that the Commission grant its Petition to be regulated pursuant to Competitive Market Regulation in each its Minnesota exchanges.

Dated this 30th day of June, 2016.

QWEST CORPORATION DBA
CENTURYLINK QC

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