



The Office of  
**Minnesota Attorney General Keith Ellison**

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April 2, 2024

**Via eFiling**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
171 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101

**Re: *In the Matter of Formal Complaint Regarding the Services Provided by the Qwest Corporation d/b/a CenturyLink in Minnesota, on Behalf of the Communications Workers of America***  
**MPUC Docket No. P-421/C-20-432**  
**OAH Docket No. 21-2500-38965**

Dear Mr. Seuffert:

The Office of the Minnesota Attorney General – Residential Utilities Division appreciates this opportunity to respond to the Findings of Fact, Conclusions of Law, and Recommendations issued by Judge Middendorf on March 13, 2024. The Report is thorough, well-reasoned, and clear in its conclusions, and the Commission should adopt it.

Throughout this docket, some of CenturyLink’s most landline-dependent telephone customers have reported repeated outages, emergency service disruptions, and other serious performance issues with their wireline telephone service. The Report documents the depth and breadth of CenturyLink customers’ wireline telephone service quality issues, and CenturyLink’s systemic failures to address them. These pervasive failures—along with expert testimony, photographs, and other record evidence captured in the Report—demonstrate that CenturyLink is failing to meet the standard of service the Commission’s rules require a carrier of last resort to provide.<sup>1</sup>

Noting that the Commission has repeatedly resisted CenturyLink’s call to extinguish the service quality rules in recent dockets, the Report reaffirms the Commission’s conclusion that the service quality rules remain vital to protect the “health and safety of people, particularly those

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<sup>1</sup> See Minn. R. 7810.3300; Minn. R. 7810.5000.

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more reliant on landline service.”<sup>2</sup> The Report then recommends a series of actions CenturyLink should take to bring its provision of service into compliance with the Commission’s rules.

The OAG strongly encourages the Commission to adopt Judge Middendorf’s findings and recommendations to protect Minnesotans. CenturyLink is the carrier of last resort for some of Minnesota’s most wireline telephone service dependent citizens. Through its rules, the Commission has outlined a standard of service every Minnesotan can expect to receive from its telephone carrier. The Report clearly documents CenturyLink’s failure to meet this standard and recommends concrete steps to restore appropriate services to Minnesotans who rely on a landline to call 9-1-1, communicate with family and friends, and other communication needs.

Sincerely,

/s/ Erin E. Conti

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<sup>2</sup> Findings of Fact, Conclusions of Law, and Recommendations at 10–11 (quoting *In Matter of the CenturyLink, Inc. Petition for Rulemaking to Revise Serv. Quality Rules*, MPUC Docket No. P-421/AM-14-256 (ORDER CLOSING RULEMAKING PROCEEDING) (May 2, 2016) (eDocket No. 20165- 120922-02)).

**CERTIFICATE OF SERVICE**

**Re: *In the Matter of Formal Complaint Regarding the Services Provided by the Qwest Corporation d/b/a CenturyLink in Minnesota, on Behalf of the Communications Workers of America***  
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I, JUDY SIGAL, hereby certify that on the 2nd day of April, 2024, I e-filed with eDockets *Exceptions of the Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*/s/ Judy Sigal*  
JUDY SIGAL

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Dianne	Barthel	Dianne.Barthel@centurylink.com	Centurylink Communications, LLC	200 S 5th St Rm 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-432_Official CC Service List
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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_20-432_Official CC Service List
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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_20-432_Official CC Service List
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