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June 19, 2018

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 a Commission Inquiry into CenturyLink's Compliance
with TAP Statutes and Rules
Docket No. P-421/CI-17-796**

Dear Mr. Wolf:

Enclosed for filing are Qwest Corporation dba CenturyLink QC's Supplemental
Comments regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

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_17-796_Official PUC
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-796_Official PUC
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_17-796_Official PUC
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_17-796_Official PUC
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_17-796_Official PUC
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-796_Official PUC

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

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

**In the Matter of a Commission Inquiry into
CenturyLink’s Compliance with TAP Statutes
and Rules**

Docket No. P-421/CI-17-796

**QWEST CORPORATION DBA CENTURYLINK QC’S
SUPPLEMENTAL COMMENTS**

Qwest Corporation dba CenturyLink QC (“CenturyLink”) files these supplemental comments in response to the Commission’s notice issued June 12, 2018. These supplemental comments respond to the issues identified in the notice.

I. The Commission Should Look to the Current Rule Language in Addressing the Adequacy of Company Complaint Records.

The Commission seeks comment on whether there are other definitions of the term “complaint” in tariffs or other documents and asks questions about the impact and relevance of defining the term in this proceeding.

Minnesota Administrative Rule 7810.1200 states:

Each utility shall keep a record of all complaints received by it from its customers which shall be classified as directed by the Public Utilities Commission. The record shall show the name and address of the customer, the date and nature of the complaint, and its disposition and date thereof. The utility shall keep records of the customer complaints *in such a manner as will enable it to review and analyze its procedures and actions.* (emphasis added)

CenturyLink suggests that the Commission review the definition of complaint in light of its stated purpose which is to allow the company to “to review and analyze its procedures and

actions.”¹ This purpose suggests that the Company should have the flexibility to define the term and Commission review of company compliance should focus on whether it retains adequate records to analyze its procedures and actions. CenturyLink is confident that its records are adequate for that purpose. CenturyLink has records on each of the complaints at issue and has individual customer records in place to the extent additional information is needed.

This suggested approach not only squares with the language in the rule, but also makes sense for the Commission. If the Commission were to mandate a broad definition of the term “complaint” such as the one suggested by the Department, it would impose a very burdensome regulatory requirement without any demonstrated corresponding benefit. If the Commission were to make such a change – a rule-making proceeding would be a more appropriate place for such an action.

However, history demonstrates the limited value and the extensive burden associated with a broad definition of the term “complaint.” In 2008, the Department and Embarq entered into a stipulation setting forth a broad definition of the term to resolve a dispute related to Embarq’s Alternative Form of Regulation Plan.² As a result of that settlement, Embarq agreed to implement an electronic complaint tracking tool that recorded all Minnesota complaints received in call centers and were escalated to a first level supervisor.³ Embarq created the tool and dealt with compliance over the course of its AFOR. As far as

¹ Minn. R. 7810.1200.

² *In the Matter of the Department Investigation into the Complaint Tracking and Reporting Process Employed by Embarq Minnesota, Inc; In the Matter of the Embarq Minnesota, Inc Revised Alternative Form of Regulation Plan*, Docket Nos. P-430/DI-07-1586; P-430/AR-07-948, Order Acknowledging Settlement and Closing Case (Dec. 15, 2008).

³ *Id.*

the company is aware, this additional tracking provided no help to the company in analyzing its processes and procedures. The data did not appear to be used for any purpose by regulators.

If the Commission were to adopt the proposed definition suggested by the Department or even the less restrictive definition agreed to by Embarq, it would impose a tremendous burden on Minnesota providers without any demonstrated benefit. The Commission should decline to specifically define the term and simply mandate that Companies maintain adequate records so that they can analyze their procedures and actions.

II. CenturyLink's Procedures provide credits in the Earliest Possible Bill Cycle

The Commission also requests information about CenturyLink's processes for applying credits and whether it complies with the requirements of Minn. Stat. § 237.70, Subd. 7(c). The statute states in relevant part:

On receiving a completed application from an applicant, the subscriber's local service provider shall provide telephone assistance plan credits against monthly charges in the earliest possible month following receipt of the application. The applicant must receive telephone assistance plan credits until the earliest possible month following the service provider's receipt of information that the applicant is ineligible.

CenturyLink complies with these requirements by using the following procedure:

1. The customer submits a TAP/Lifeline Application
2. CenturyLink reviews the application within 5 days.
3. Within the five-day time period, CenturyLink either approves the application or sends a letter to the customer explaining why the application was not approved.
4. If the application is approved, discounts are applied effective the day CenturyLink received the application.
5. Any discounts appear in the next bill issued after the review.

This process ensures that customers receive credit in the earliest possible billing cycle.

CenturyLink believes it meets the requirements of Minn. Stat. § 237.70, Subd. 7(c).

CONCLUSION

CenturyLink respectfully urges the Commission to interpret the term “complaint” in Minn. R. 7810.1200 in light of whether or not the company maintains adequate information to review its procedures and actions. There is no need for the Commission to more precisely define the term. CenturyLink also suggests that the Commission find its procedures meet the requirements of Minnesota Statutes for ensuring that Telephone Assistance Plan Credits are applied in the earliest possible month.

Dated this 19th day of June, 2018.

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