

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

Beverly Jones Heydinger	Chair
Dr. David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

In the Matter of a Rulemaking to Consider  
Possible Amendments to *Minnesota Rules*  
parts 7810.4100 through 7810.6100

MPUC Docket No.: P-999/R-14-413

**COMMENTS OF MINNESOTA CABLE COMMUNICATIONS ASSOCIATION**

The Commission issued a Request for Comments “regarding possible changes to the existing rules, parts 7810.4100 through 7810.6100” in the above-captioned proceeding on August 4, 2014. The Request asked parties to provide specific evidentiary support for any changes. The Minnesota Cable Communications Association (MCCA) does not seek any changes to the existing service quality rules.

MCCA customers however, could be affected by proposals others advance for changing the existing rules. The focus of this docket should be rules relating solely to retail service quality. Proposals for relaxing retail service quality standards will point to the existence of competitive service providers as a justification. To the extent that there are competitive alternatives for consumers, it depends in large part upon the existence of a well-functioning wholesale market and interconnection agreements that secure adequate performance between carriers.

Our customers could be harmed by changes to service quality rules that establish measures for assessing wholesale quality service under CenturyLink’s Performance Assurance Plan in MCCA members’ interconnection agreements. Rules 7810.5400 to .5900, for example,

set service quality standards for Interoffice Trunks, Transmission Requirements, Interruptions of Service, and Customer Trouble Reports and these standards are related measures in the CenturyLink Performance Assurance Plan. Changes in these rules that had the effect of removing or lowering any of these standards may be harmful to our customers and contrary to the public interest.

The Commission's Request for Comments did not address whether it would afford parties an opportunity to respond to the proposals submitted by other parties. The MCCA respectfully request such an opportunity. In its Request for Comments, the Commission specifically ordered parties proposing changes to provide substantial evidence and gave parties four months to prepare their comments. Depending upon the proposals, the MCCA and other parties might need to retain experts to review the record and prepare reply comments. Accordingly, the MCCA requests that reply comments be permitted and due no sooner than April 4, 2015.

Dated: December 4, 2014

MINNESOTA CABLE COMMUNICATIONS  
ASSOCIATION

A handwritten signature in black ink, appearing to read "Anthony S. Mendoza". The signature is fluid and cursive, with the first name "Anthony" being the most prominent part.

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