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March 13, 2015

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St Paul Minnesota 55101-2147

RE: **Reply Comments of the Minnesota Department of Commerce**
Docket No. P999/R-14-413

Dear Mr. Wolf:

Attached are the reply comments of the Minnesota Department of Commerce (Department) in the following matter:

Rulemaking to consider possible amendments to Minnesota Rules, parts 7810.4100 through 7810.6100.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ DIANE DIETZ
Rate Analyst

/s/ KATHERINE DOHERTY
Rate Analyst

DD/KD/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

REPLY COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. P999/R-14-413

I. BACKGROUND

On May 22, 2014, the Commission issued an Order Detailing Disposition of Petition and Initiating Rulemaking Proceeding in the matter of a petition of CenturyLink, Inc. for Waiver of Minnesota Rule Part 7810.5800 and in the matter of a rulemaking proceeding to consider possible amendments to Minnesota Rules Parts 7810.4100 through 7810.6100 in Docket Nos. P421/AM-14-255, P421/AM-14-256, and P999/R-14-413.

The Commission specifically recognized, in its Order, its core duty, in its oversight of telecommunications to consider the state's policy goal of maintaining or improving service quality.

At the same time, the Commission acknowledged changes in technology and the evolution of a more competitive marketplace. The Commission stated, however, that:

The extent to which these shifts require different rules to more accurately and effectively meet the current demands and needs of consumers is not known. Nor is it clear, based on the information in front of the Commission today, that the existing standards are irrelevant or discourage fair and reasonable competition. It is essential that *substantive evidence be provided to demonstrate the need for rule changes* that would more effectively implement the state's policy goals.¹ (Emphasis added.)

To that end, the Commission initiated a rulemaking proceeding to consider possible changes to Minn. R. parts 7810.4100 through 7810.6100 and issued a Notice Requesting Comments.

¹ In the Matter of CenturyLink, Inc. Petition for Rulemaking to Revise Service Quality Rules, et. al., Docket Nos. P421/AM-14-256; P421/AM-14-255, P999/R-14-413, page 5-6.

On December 4, 2014, comments on the proposed rulemaking proceeding were submitted by CenturyLink, Inc.; Citizens Telecommunications Company, LLC and Frontier Communications of Minnesota, Inc. (jointly); Eschelon Telecom of Minnesota, Inc. d/b/a Integra, Integra Telecom of Minnesota, Inc. d/b/a Integra, TW Telecom of Minnesota, LLC, TDS Metrocom, LLC and Velocity Telephone, Inc. (known as the Joint Competitive Local Exchange Carriers Joint CLECs); and the American Association of Retired Persons, the Institute for Local Self-Reliance, the Minnesota Community Action Partnership, and the Twin Cities Metro Independent Business Alliance (known as the Telecommunications Consumer and Small Business Coalition).

On December 24, 2014, the Commission issued a Notice in Docket No. P999-R-14-413 setting the due date for reply comments at March 13, 2015.

II. GUIDANCE PROVIDED BY THE FCC'S PHOENIX FORBEARANCE ORDER² AND THE DEPARTMENT OF JUSTICE/FEDERAL TRADE COMMISSION'S HORIZONTAL MERGER GUIDELINES³

The Horizontal Merger Guidelines (the Guidelines) outline a fact-specific process through which the Department of Justice and the Federal Trade Commission may apply a range of analytical tools to the available evidence in order to evaluate competitive concerns raised by mergers between rival suppliers. The central question to be addressed in such an analysis is whether a merger may substantially lessen competition.

While the instant case does not involve evaluation of a merger, the analytical tools discussed in the Guidelines are useful in the instant docket in evaluating whether telecommunications carriers subject to the Commission's Service Quality rules face *effective* competition, i.e. not only that adequate alternative products or services exist, but that consumers have the *ability and willingness to substitute* away from one product to another in response to a price increase or a corresponding non-price change such as a reduction in product quality or service."⁴ As the OAG points out in its December 4, 2014 comments, "goods and services are not reasonably interchangeable, and therefore will not constrain the actions of the seller, *unless they share the same product market and geographic market.*"⁵ In the Phoenix Forbearance case, the FCC applied the Horizontal Merger Guidelines to evaluate competition in the context of a petition for forbearance from the application of certain regulatory requirements filed by Qwest Corporation (nka CenturyLink.)

² Horizontal Merger Guidelines, U.S. Department of Justice and the Federal Trade Commission, August 19, 2010. (*Horizontal Merger Guidelines or the Guidelines*).

³ In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. §160(c) in the Phoenix Arizona Metropolitan Statistical Area, WC Docket No. 09-135, Memorandum Opinion and Order, June 22, 2010. (*Phoenix Forbearance Order*).

⁴ Horizontal Merger Guidelines page 7. See also December 4, 2014 Comments of the OAG, page 8.

⁵ December 4, 2014 comments of the OAG, page 8.

In particular, the FCC evaluated whether mobile wireless service effectively constrained the price of wireline service, noting that the two services should be in the same relevant product market only if the prospect of buyer substitution to mobile wireless access constrains the price of wireline access. The FCC considered whether there are a sufficient number or wireline service customers who, in response to a price increase in wireline local access service would stop subscribing to their wireline service and instead rely exclusively on mobile wireless service, so as to render the price increase unprofitable.⁶

III. DEPARTMENT REPLY COMMENTS

Comments of CenturyLink

In its December 4, 2014 comments, CenturyLink states that “Minnesota’s voice market is competitive in every single exchange,”⁷ and proposes, as an initial matter, that the Commission limit its analysis to residential markets.

CenturyLink also states that “For business customers purchasing four or more lines, the state legislature has defined the entire state as competitive marketplace through its passage of Minn. Stat. § 237.411,”⁸ and notes that “the number of business customers that purchase fewer than four lines in Minnesota from CenturyLink is an extraordinarily small number of customers.”⁹ CenturyLink concludes that “either very few Minnesota business customers purchase fewer than four lines or the marketplace for such customers is so competitive that most such customers have opted to purchase such services from other providers.”¹⁰

While, as CenturyLink states, Minn. Stat. § 237.411, subd. 2 defines all exchanges located in Minnesota as competitive, only business customers with 4 or more lines are subject to the reduced regulation as described in this statute. Although CenturyLink states the number of business customers that purchase fewer than four lines in Minnesota from CenturyLink is relatively small, the business plans of many competitive local exchange carriers (CLECs) and small incumbent local exchange carriers, which are also subject to the quality standards, focus on serving small businesses.

The Department recommends that the Commission consider both residential and small business services in its analysis. While CenturyLink apparently prefers to focus on the market for large business customers, the market for residential and small business customers continues to need regulatory oversight to ensure the maintenance of satisfactory service quality standards. If carriers are permitted to allow service quality to deteriorate on

⁶ Phoenix Forbearance Order, para 56.

⁷ CenturyLink comments, page 6.

⁸ The Department notes that while Minn. Stat. § 237.411, subd. 2 defines all exchanges located in Minnesota as competitive, only business customers with 4 or more lines are subject to the reduced regulation as described in this statute.

⁹ CenturyLink comments, page 8.

¹⁰ *Id.*

the traditional services used by residential and small business customers, these customers may feel they have no choice but to switch to higher-margin, higher-priced services. In such a case, carriers would have a disincentive to maintain the service quality standards on the traditional network. The best way to avoid having customer's choices usurped is to maintain the existing service quality standards.

In response to the Commission's request for information about competition in Minnesota, and in support of its contention that "competition in the Minnesota residential market is extensive and exists throughout the states,"¹¹ CenturyLink offers the affidavits of Mr. Robert Brigham, and Dr. Brian Staihr.

In Mr. Brigham's affidavit, he notes that, as competition for voice communications services has increased, CenturyLink has experienced a significant decline in number of access lines and he provides a chart showing the total number of CenturyLink Minnesota access lines by year between 2001 and 2013.¹² Mr. Brigham then states that "almost three quarters of the households that CenturyLink could serve in Minnesota purchase no voice services from the company,"¹³ and he notes that "the overall Minnesota market for voice telephone services has grown substantially during the same period that CenturyLink has lost over 60% of its subscriber access lines."¹⁴

Mr. Brigham's data may not provide details, however, on the unknown percentage of business lines that are lost by CenturyLink, but not lost to a competitor. Attachment B contains CenturyLink's response to a Department Information Request. In that Information Request, the Department asked how much of the decline in access lines was attributable to moving from "CT of MN and Embarq" and "CenturyLink QC" to CenturyLink Communications, LLC voice over Internet Protocol (VoIP) platform.¹⁵ CenturyLink's response states:

It is likely that some business customers chose to move from traditional telephone service purchased from one of the CenturyLink ILECs to VoIP services over the past few years, as CenturyLink Communications, LLC does offer a suite of business VoIP services. CenturyLink cannot identify the number of business customers that chose to switch from traditional voice service to VoIP services, but CenturyLink does know the number of business customers subscribing to the company's VoIP services, as identified in response to No. 2.¹⁶

While the Department does not deny that CenturyLink has lost a certain percentage of its lines in Minnesota to competitors, the line counts and percentage of lines lost, as reported

¹¹ *Id.* at page 7.

¹² Brigham affidavit, page 4.

¹³ *Id.*, page 5.

¹⁴ *Id.*, page 8.

¹⁵ The Department sent an Information Request to CenturyLink asking the same question for services moving from "CT of MN and Embarq" and "CenturyLink QC" to any CenturyLink Communications, LLC service, however the response was not due in time for this filing.

¹⁶ See Attachment B

in Mr. Brigham's affidavit, may not reflect lines lost to another of CenturyLink's entities. At a minimum, CenturyLink should disclose that some unknown percentage of lines falls in this bucket even if it cannot identify the exact number. The Commission may choose to require all carriers to track this type of information.

In addition to the information provided relating to CenturyLink's declining market share, Mr. Brigham discusses the availability of alternative services such as mobile wireless service, service provided by competitive local exchange carriers, and VoIP. Mr. Brigham concludes that "the existence of wireless alternatives (as well as cable and other wireline options) creates a competitive market that self-regulates CenturyLink's pricing and service quality based on the demands and preferences of consumers."¹⁷

In Mr. Brigham's affidavit, he assumes that VoIP service functions "in a manner similar to standard circuit switched telephony," but he acknowledges that "to utilize VoIP services, a customer must have a high speed connection, such as a fiber connection, Digital Subscriber Line ("DSL"), a high-speed wireless connection or a cable modem." Mr. Brigham concludes, without support, that "These are functionally equivalent or substitute services readily available at competitive rates, terms and conditions."¹⁸ Mr. Brigham admits that there are a "few areas within CenturyLink wire center boundaries where there is no wireless coverage, and this occurs only in the most sparsely populated areas."¹⁹

These "sparsely populated areas," which Mr. Brigham chooses to downplay in his affidavit, in reality, cover a geographically large area in Minnesota. Nonetheless, Mr. Brigham argues (on page 27 of his affidavit) that "wireless providers today make functionally equivalent or substitute services readily available." Mr. Brigham's analysis, unfortunately, assumes away the need for reliable service in sparsely populated areas of the State.

Further, Mr. Brigham's analysis does not fully consider the value of reliability and the perceived safety of wireline, the value of a single point of contact for multiple household members, households that have poor wireless coverage, home-based business' needs for reliability and the sound quality of wireline, or the need for services that are more economically purchased when bundled with local wireline. Interestingly, CenturyLink appears to acknowledge that, for at least some customers, wireless service is not an adequate substitute for wireline service in a recent advertisement mailed to customers ("A better, more reliable connection doesn't need a cell tower. It just needs a phone jack").²⁰

The affidavit of Dr. Staihr addresses the question of whether wireless service competes with wireline service and attempts to demonstrate that wireless service should be considered a substitute for purposes of this proceeding. The Department is unconvinced by CenturyLink's arguments. Wireless service may provide a level of competition with some wireline services, but is unlikely to satisfy the needs fulfilled by other communications services, for example, in

¹⁷ Brigham affidavit, pages 25-26.

¹⁸ Brigham Affidavit, page 31.

¹⁹ *Id.*

²⁰ See DOC Attachment A.

facilitating contact with public safety agencies, schools, hospitals, doctor offices, financial institutions, etc.

As the Minnesota Office of the Attorney General (OAG) points out in its comments, CenturyLink has the burden of making a threshold showing that its wireline customers are willing and able to substitute wireless or VoIP service if the circumstances warrant.²¹ CenturyLink has not met that burden. CenturyLink has not provided sufficient evidence to demonstrate that all service needs are satisfied by competitive alternatives in all locations of the state, and has not demonstrated that effective competition exists such that the service quality rules are unnecessary. As the OAG states in its December 4, 2014 comments, “Unless it can make this threshold showing, CenturyLink’s request that the Commission rollback its Service Quality Rules based on the alleged competition it faces from providers of wireless and VoIP telephone service is nothing more than a myth.”²²

Rule Revisions Proposed by CenturyLink

CenturyLink proposes eliminating most of the existing service quality standards based on its unsupported theory that competition has made the standards unnecessary. CenturyLink proposes eliminating the following rules: Minn. Rules pt. 7810.4100 (Access to Test Facilities), 7810.4300 (Accuracy Requirements), 7810.4900 (Adequacy of Service), 7810.5100 (Telephone Operators), 7810.5200 (Answering Time), 7810.5300 (Dial Service Requirements), 7810.5400 (Interoffice Trunks), 7810.5900 (Customer Trouble Reports), 7810.6000 (Protective Measures). While proposing to eliminate these sections of the Commission’s service quality rules, CenturyLink provides scant basis to support its proposal.

CenturyLink fails to substantiate its proposed rule revisions and, as a result, fails to establish an adequate basis for adopting its proposals. For example, CenturyLink proposes eliminating Minn. Rules pts. 7810.4100 (Access to Test Facilities) and 7810.4900 (Adequacy of Service) arguing that it does not address the complexity of the communications network. Rather than proposing a rule that addresses the complexity of the current network, CenturyLink instead proposes eliminating the standard altogether. CenturyLink proposes eliminating Minn. Rules pt. 7810.5200 (Answering Time) and 7810.5900 (Customer Trouble Reports), but fails to explain how the marketplace will define the standards in the absence of the existing rules. CenturyLink proposes eliminating Minn. Rules pts. 7810.4300 (Accuracy Requirements) and 7810.5300 (Dial Service Requirements) arguing that the rules do not reflect current methods of operations, but CenturyLink fails to explain why the current methods of operations render these rules unnecessary. CenturyLink proposes eliminating Minn. Rules pt. 7810.5400 (Interoffice Trunks) arguing that the Commission has authority to resolve issues without such a rule. Under CenturyLink’s proposed revision to Minn. Rules pt. 7810.5400, the Commission would have to take remedial action to deal with complaints regarding connection standards for interoffice trunks, rather than rely on established standards intended to proactively reduce the incidence of such complaints. CenturyLink proposes eliminating Minn. Rules pt.

²¹ Office of the Attorney General comments of December 4, 2014, pages 7 - 8.

²² *Id.* at page 8.

7810.6000 (Protective Measures) arguing that workplace safety is covered by other agencies, but the carrier provides no details regarding the regulatory oversight of other agencies.

CenturyLink proposes eliminating the specific standards in the following sections and replacing the specific standards with vague, general language requiring carriers to act reasonably: Minn. Rules pts. 7810.5000 (Utility Obligations) and 7810.5800 (Interruptions of Service). The generality of the language, proposed by CenturyLink would create difficulties in enforcement of these regulations. CenturyLink proposes eliminating Minn. Rules pt. 7810.5000 (Utility Obligations) claiming this involves unnecessary record keeping, but the carrier fails to explain how regulators will monitor service quality under the proposed regulatory revision. CenturyLink proposes eliminating the existing text of Minn. Rules pt. 7810.5800 (Interruptions of Service) and replacing it with a general requirement to inform the Commission of “major catastrophes.” Under CenturyLink’s proposal, the Commission would only be informed of service outages that rose to the level of “major catastrophes.” Such a rule would leave the Commission unable to carry out its responsibilities to satisfactorily monitor service quality.

Comments of Frontier

Like CenturyLink, Frontier provides information regarding its loss of access lines over the past 17 years, noting that it has lost “roughly half of its customers to competitors of one sort or another.”²³

Frontier states that the Commission’s service quality rules apply to only about 17% of the lines in the state,²⁴ and Frontier provides a table purportedly illustrating the relative market share of various competitors. In doing so, Frontier admits to making the following assumptions:

1. Half of the wireless lines are business and half are residential.
2. Customers generally have a choice of at least two wireless providers.
3. The two wireless providers available to customers are assumed to have equal market share.
4. Customers have a choice of at least one competitive local exchange carrier.
5. Standalone VoIP service is available “nearly everywhere.”

None of these assumptions are supported, and call into question the accuracy and the usefulness of the provided information. It is not likely, for example, that the number of business and residence wireless lines is evenly split. Not all customers, particularly those in rural areas, have access to one, let alone two, wireless providers. The same is true of competitive local exchange carriers. Further, the categories are not mutually exclusive. A consumer may have, for example, both a wireless and an incumbent local exchange carrier (ILEC) line. It appears that even Frontier believes consumers may need both wireless and an ILEC line given the introduction of its new service “Frontier Emergency Connect Service.”

²³ Frontier comments, page 4.

²⁴ Frontier comments page 4.

Frontier and Citizen's introduced this new service in July of 2014.²⁵ Whether it is inaccurate 911 location information, spotty coverage for wireless service or the loss of power for VoIP service, it is clear that Minnesota consumers may need an alternative to wireless or VoIP service to ensure reliable access to 911 emergency services.²⁶ Therefore, where Frontier suggests that ILECs have only a 17% market share, it is likely much more than 17% of consumers that are served by ILECs.

Frontier acknowledges that whether wireless service is a substitute for wireline service is a threshold question that must be addressed in this rulemaking. Frontier cites to the fact that the Commission has approved several requests from wireless carriers to be designated as Eligible Telecommunications Carriers under the provisions of the Telecommunications Act of 1996.²⁷

Frontier also cites to Department of Health statistics reflecting the percentages of Minnesota households that have both a wireless and wireline phone, are wireless-only and are wireline only. Apparently because the data reflects that 35% of Minnesota "outstate" households are wireless only and 7% are wireline only, and in the Twin Cities, 37% and 3% respectively, Frontier concludes, without further analysis, that customers are between "five and twelve times more likely to choose wireless to wireline service."

Frontier's analysis does not take into account that that wireline service may be the service of choice for certain types of calls, like calls to 911 (see discussion above regard Frontier's Emergency Connect Service), calls to and from business entities, calls to and from certain age groups of callers and calls from rural areas where wireless service may be sporadic or non-existent.²⁸

As the FCC pointed out in the Phoenix Forbearance Order, knowing the percentage of households that rely exclusively on mobile wireless is insufficient to determine whether mobile wireless services have a price constraining effect on wireline access services. As the OAG points out in its comments, "The extent to which one market prevents exploitation of another market depends on the extent to which consumers will change their consumption of one product in response to a price change in another, i.e., the 'cross-elasticity of demand.'"²⁹ Just because cellular telephones and wireline telephones both allow a consumer to make a call does not indicate that the products are perfect substitutes for one another.

²⁵ See Docket Nos. P407/AM-14-603 and P405/AM-14-604.

²⁶ Commissioners Lipschultz and Wergin also recognized that "Frontier Emergency Connect Service" would likely be provided in addition to another service during the October 2, 2014 PUC Agenda meeting when discussing Docket Nos. 14-603 and 14-604. Commissioner Lipschultz stated that it makes sense to offer this focused service in conjunction with whatever else they [customers] have, and Commissioner Wergin stated that a customer may need this if, for example, a cell phone doesn't work. See Commission meeting video at 31:38 and 1:04 at http://minnesotapuc.granicus.com/MediaPlayer.php?view_id=2&clip_id=250

²⁷ The Department notes that none of the wireless ETCs to whom Frontier refers and whose service, according to Frontier, was found by the Commission to be "in direct competition with wireline service," are currently operating in Minnesota today.

²⁸ See comments of the Telecom Consumer/Small Business Coalition, page 2.

²⁹ OAG comments, page 7, quoting *Eastman Kodak Co. v. Image Technical Services, Inc.*.

Rule Revisions Proposed by Frontier

Frontier proposes eliminating the following rules, but provides scant basis to support their proposal: Minn. Rules pts. 7810.4100 (Access to Test Facilities), 7810.5300 (Dial Service Requirements), and 7810.5400 (Interoffice Trunks).

Frontier proposes eliminating the specific standards in the following sections and replacing the specific standards with vague, general language requiring carriers to act reasonably: Minn. Rules pts. 7810.4300 (Accuracy Requirements), 7810.4900 (Adequacy of Service), 7810.5100 (Telephone Operators), and 7810.5800 (Interruptions of Service). The generality of the language, proposed by Frontier/Citizens would create an environment with no enforceable regulations.

Frontier proposes a specific change to the regulatory standard in Minn. Rules pt. 7810.5200 (Answering Time) and 7810.5900 (Customer Trouble Reports). At the present time, there is insufficient information in the record to determine the effect of the proposed changes on other carriers.

Comments of the Minnesota Telecom Alliance

In its December 4, 2014 comments, the Minnesota Telecom Alliance (MTA) emphasizes the significant share of the market served by competitive local exchange carriers, wireless carriers and VoIP service providers. Table 1 of the MTA comments contains a listing of the number of “authorized” local service providers in seven outstate exchanges.³⁰

While the information in Table 1 shows some level of interest in serving seven exchanges selected by the MTA, there is nothing in the MTA comments to suggest that the list of seven exchanges constitutes a valid statistical sample of the Minnesota market for wireline telecommunications services. The comments establish no basis to support an assumption that the seven exchanges listed in Table 1 are representative of all other exchanges. While multiple carriers may be authorized to serve in the exchanges specified in Table 1, they may not be operational providers of service in the specified exchanges, nor do the carriers necessarily serve all classes of customers in those exchanges or provide all the communications options desired by all customers.

The MTA comments go on to discuss the market penetration levels of two main alternatives to switched access service: VoIP and wireless services. The MTA cites nationwide data derived from the June 30, 2013 Local Telephone Competition Report issued by the Federal Communications Commission to support its contention that VoIP and wireless service comprise the primary means of communication of a significant share of today’s telecommunications market.³¹ While VoIP and wireless service may serve some or most of the communication needs of certain people living in certain locations in Minnesota, it may

³⁰ December 4, 2014 comments of the Minnesota Telecom Alliance, page 5, Table 1 citing data from the Minnesota Department of Commerce Phone Service Providers Database.

³¹ *Id.* at pages 5 – 9 citing the Federal Communication Commission, Local Telephone Competition; Status as of June 30, 2013 (cited as the June 2013 Local Telephone Competition Report).

not be an available or reliable alternative for Minnesotans living in other parts of the State or for certain types of communications (such as E911 calls or home-based business calls).

The Telecommunications Consumer and Small Business Coalition stated in their comments: “Even where competition may exist, the service provided by competitors is spotty and unreliable, and thus many Minnesotans still require – and in some cases depend on – landline service. For instance, in rural areas, many homes may show up as having wireless options on maps even though the signal is not strong enough to work within the house. *Presently, there is no reliable way to discern who truly has a choice in telephony and who does not.*”³² Emphasis added. Indeed, the data cited by the MTA provide no reliable way to determine “who truly has a choice in telephony.” Further, the communication needs of some consumers may only be satisfied by wireline telecommunications service. As the Telecommunications Consumer and Small Business Coalition notes, “landline service is critical for certain Minnesotans with disabilities who require specialized assistance to utilize telephone service.”³³

Rule Revisions Proposed by the MTA

The MTA proposes eliminating most of the existing service quality standards based on their unsupported theory that competition has made the standards unnecessary. The MTA proposes eliminating Minn. Rules pt. 7810.4100 (Access to Test Facilities) based on the assumption that Internet Protocol (IP) switches have inherent testing and maintenance capabilities that render this rule obsolete.³⁴ The MTA’s proposal ignores the fact that not all switches are IP based. The MTA also proposes eliminating Minn. Rules pts. 7810.4300 (Accuracy Requirements) and 7810.5300 (Dial Service Requirements) based on claimed obsolescence, but fails to explain how these regulations are obsolete at a time when the Commission and FCC are wrestling with rural call completion issues, among other issues. The MTA proposes eliminating the following sections of the Minnesota Rules and replacing the rules with general language requiring carriers to act reasonably: Minn. Rules pts. 7810.4900 (Adequacy of Service), 7810.5000 (Utility Obligations), and 7810.5800 (Interruptions of Service). The proposal to replace the existing specific standards with a vague, general requirement to act reasonably would create enforcement difficulties for the Commission.

IV. COMMISSION ALTERNATIVES

- A. Find that sufficient evidence has been provided to demonstrate that adequate service quality will be maintained absent the service quality rules, and proceed to consider the specific rule changes recommended by the commenting parties.
- B. Find that insufficient evidence has been provided to demonstrate that adequate service quality will be maintained absent the service quality rules. Close the rulemaking proceeding without further action.

³² December 4, 2014 comments of the Telecommunications Consumer and Small Business Coalition, page 2.

³³ *Id.* at page 2.

³⁴ December 4, 2014 comments of the Minnesota Telecom Alliance, page 12.

- C. Find that some of the proposed rule changes are adequately supported and that the changes would not result in diminished service quality to wireline customers. Proceed to consider the specific rule changes where the Commission finds sufficient support to change the rule.

V. DEPARTMENT RECOMMENDATION

The Department recommends Alternative B. The Commission should find that insufficient evidence has been provided to demonstrate that adequate service quality will be maintained absent the service quality rules. The Commission should close the rulemaking without further action.

/lt

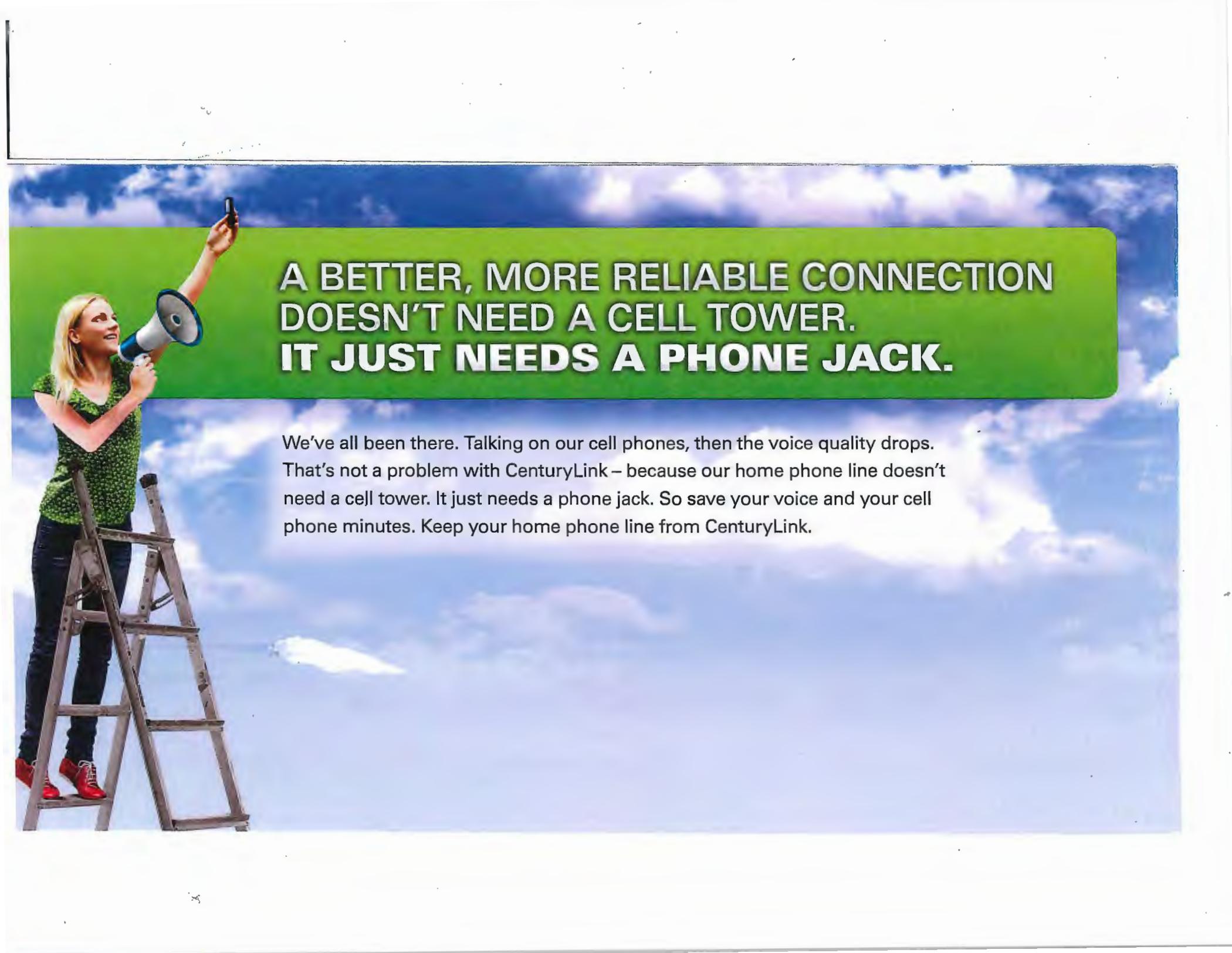
DOC-ATTACHMENT A



You don't have to be a contortionist to get a clear connection.



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A woman with blonde hair, wearing a green patterned top and black pants, stands on a wooden ladder. She is holding a blue and white megaphone to her mouth with her left hand and a black cell phone in her right hand, pointing it upwards. The background is a bright blue sky with scattered white clouds. A green horizontal bar is overlaid on the right side of the image, containing white text.

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DOC-ATTACHMENT B



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

February 10, 2015

Mr. Alexius M. Hofschulte
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

**Re: In the Matter of a Rulemaking to Consider Possible Amendments to
Minnesota Rules, part 7810.4100 through 7810.6100
Docket No. P-999/R-14-413**

Dear Mr. Hofschulte:

Enclosed please find CenturyLink's response to the Department of Commerce Information Request No. 1 regarding the above-referenced matter.

Very truly yours,

A handwritten signature in black ink, appearing to be "JDT", with a long horizontal line extending to the right.

Jason D. Topp

JDT/bardm

Enclosures

State of Minnesota
DEPARTMENT OF COMMERCE

Utility Information Request

Docket Number: P999/R-14-413

Date of Request: January 29, 2015

Requested From: Jason D. Topp
CenturyLink, Inc.
Associate General Counsel – Regulatory
CenturyLink
200 South 5th Street, Room 2200
Minneapolis, MN 55402

Response Due: February 10, 2015

Analyst Requesting Information: Diane Dietz

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
1	<p>On December 4, 2015, CenturyLink filed comments in the Commission’s quality of service rulemaking proceeding in Docket P999/R-14-413. Included with these comments was an Affidavit filed by Robert Brigham. The Robert Brigham Affidavit, page 4, contains a chart entitled “Total CenturyLink Minnesota Access Lines (Thousands)” and covers the years 2001 through the year 2013. Footnote 5 on page 4 of Mr. Brigham’s Affidavit states that “between December 2001 and September 2014, CenturyLink residential lines declined 70% from 1,572,184 to 478,241 and business lines declined 62% from 679,453 to 259,042.” Please answer the following questions.</p> <ol style="list-style-type: none">1. For each of the years 2001 through 2014, how much of the annual decline in access lines, for <u>any service</u> and <u>any class of service</u> referenced anywhere in CenturyLink’s comments is attributable to moving the lines from “CT of MN and Embarq” and “CenturyLink QC” to CenturyLink Communications, LLC (i.e., the VoIP platform)?2. For each of the years 2001 through 2014, state how many Minnesota lines were being served by CenturyLink Communications, LLC.

Response by: _____

List sources of information: _____

Title: _____

Department: _____

Telephone: _____

Response:

1. For residential services, none of the reduction in access lines is attributable to lines being moved from “CT of MN and Embarq” and “CenturyLink QC” to CenturyLink Communications, LLC (i.e., the VoIP platform). While Qwest Communications Company briefly offered a residential VoIP service in the early 2000s, the residential service was discontinued several years ago. CenturyLink does not currently offer a VoIP service to residential customers.

It is likely that some business customers chose to move from traditional telephone service purchased from one of the CenturyLink ILECs to VoIP services over the past few years, as CenturyLink Communications, LLC does offer a suite of business VoIP services. CenturyLink cannot identify the number of business customers that chose to *switch* from traditional voice service to VoIP services, but CenturyLink does know the number of business customers subscribing to the company’s VoIP services, as identified in response to No. 2.

2. CenturyLink is unable to identify the number of VoIP services back to 2001 but can identify the quantity of VoIP lines provided by CenturyLink Communications, LLC (formerly Qwest Communications Corporation) for the years 2010 through 2014. Please see Trade Secret Attachment A.

Response by: _____	List sources of information: _____
Title: _____	_____
Department: _____	_____
Telephone: _____	_____

**TRADE SECRET/PRIVILEGED INFORMATION
CLASSIFICATION RATIONALE**

State: Minnesota

Description/Title of Information: In the Matter of a Rulemaking to Consider Possible Amendments to Minnesota Rules, part 7810.4100 through 7810.6100
Docket No. P-999/R-14-413

Rationale: Attachment A to CenturyLink's Response to the Department of Commerce's Information Request No. 1 contains information that is considered Trade Secret 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, Attachment A to CenturyLink's Response to the Department of Commerce's Information Request No. 1 should be protected from public disclosure.

CenturyLink Business Voice over Internet Protocol (VoIP) Quantities

Minnesota

[Trade Secret Data Begins

Trade Secret Data Ends]

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Reply Comments**

Docket No. P999/R-14-413

Dated this 13th day of March 2015

/s/Sharon Ferguson

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U13224 CLEC 5564
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U14074 CLEC 6690
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U13908 CLEC 6403
Neutral Tandem-Minnesota, LLC
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U10716 CLEC 419
New Ulm Telecom, Inc. dba NU-Telecom
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New Ulm MN 56073-0697

U13897 CLEC 6387
Nextera Communications, LLC
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U13686 SLEC 6078
Northern Iowa Telephone Company
Kent Westphal
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Sioux Center IA 51250

U13732 CLEC 6144
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U13016 CLEC 5374
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Cincinnati OH 45249-3313

U10676 SLEC 3007
Minnesota Independent Equal Access Corp
Mary Buley
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U14037 CLEC 6636
Mobilitie, LLC
Chester Bragado
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U6852 CLEC 6852
Mosaic Networx LLC dba MX NETWORK
Joe Buck VP Eng
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San Rafael CA 94903

U14060 CLEC 6669
Network Innovations, Inc.
Milan Saric
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Chicago IL 60607-1647

U14028 CLEC 6625
New Horizons Communications Corp.
Glen Nelson VP Mktg & Bus Dev
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Lexington MA 02420

U14055 CLEC 6663
NewPath Networks, LLC
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U13973 CLEC 6516
Nextlink Wireless, LLC
Kelly Faul Director Reg Affairs
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U10736 SLEC 638
Northern Telephone Co.
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U10755 SLEC 552
Osakis Telephone Company
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Pwerham MN 56573

U10556 CLEC 438
POPP.com, Inc.
Karrie Willis Regulatory
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Golden Valley MN 55427

U13415 CLEC 5745
PaeTec Communications, Inc.
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U10785 CLEC 423
Paul Bunyan Rural Telephone Coop
Gary Johnson Gen Mgr
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Bemidji MN 56601-5660

U13889 CLEC 6370
Preferred Long Distance, Inc.
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Encino CA 91436

U10706 LEC 421
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U6859 CLEC 6859
Redwood County Telephone Company
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Perham MN 56573

U10851 SLEC 560
Rothsay Telephone Company
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Rothsay MN 56579

U10914 SLEC 561
Sacred Heart Telephone Company
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U6890 CLEC 6890
SelecTel, Inc.
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U10937 SLEC 3076
South Dakota Network, LLC
William P Heaston
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Sioux Falls SD 57104-2543

U10942 SLEC 564
Spring Grove Communications
Craig Otterness
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Spring Grove MN 55974

U10784 SLEC 422
Park Region Mutual Telephone Co. - Coop
Dave Bickett
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Underwood MN 56586-0277

U10795 SLEC 555
Pine Island Telephone Company dba BEVC
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Blue Earth MN 56013

U6825 CLEC 6825
Public Wireless, Inc.
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U6904 CLEC 6904
RCLEC, Inc.
Anita Taff-Rice
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U6859 SLEC 6859
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U10855 SLEC 425
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Hoffman MN 56339-0336

U10921 SLEC 426
Scott-Rice Telephone Company
Donna Heaston Mgr, Reg Affairs
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U10933 SLEC 428
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U10796 SLEC 556
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U13655 CLEC 6034
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U10832 SLEC 558
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U13334 CLEC 5657
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U10855 CLEC 425
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U12819 CLEC 5188
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U13650 CLEC 6026
Sound Choice Communications, LLC
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U6875 CLEC 6875
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U10952 SLEC 565
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U6906 CLEC 6906
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U13198 CLEC 5542
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U14076 CLEC 6694
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U13002 CLEC 5361
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U10789 SLEC 554
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U11025 CLEC 465
USLink, Inc. dba TDS METROCOM
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U13394 CLEC 5720
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U6821 CLEC 6821
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U14068 CLEC 6683
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U6885 CLEC 6885
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U13792 CLEC 6224
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U13146 CLEC 5496
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U11022 SLEC 429
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U11040 CLEC 566
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U11056 SLEC 567
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U11097 SLEC 570
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C/O NEW ULM TELECOM INC.
New Ulm MN 56073

U13727 CLEC 6138
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U11101 CLEC 432
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U13534 CLEC 5882
Windstream EN-TEL, LLC
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U10579 SLEC 413
Windstream Lakedale, Inc.
Lyndall Nipps Reg VP-State Govt Affairs
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U14089 CLEC 6714
Windstream Northstar, LLC
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U11111 SLEC 574
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U14014 CLEC 6598
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U11125 SLEC 577
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U6850 CLEC 6850
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U12806 SLEC 5176
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U12858 CLEC 5225
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U14054 CLEC 6660
Windstream Norlight, Inc.
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