

STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger  
David C. Boyd  
Nancy Lange  
J. Dennis O'Brien  
Betsy Wergin

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Minnesota Independent Coalition's Petition  
for Removal of Specific Script Requirements for Local Exchange  
Carriers Other than Qwest Corporation dba CenturyLink QC per  
Commission Order in Docket 96-482

P-999/M-14-33

**COMMENTS OF  
CITIZENS TELECOMMUNICATIONS COMPANY OF MINNESOTA, LLC  
and  
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.**

In a January 15, 2014 *Notice of Comment Period on MIC's Petition*, in this docket, the Minnesota Public Utilities Commission ("Commission") sought comments from interested parties regarding the petition of the Minnesota Independent Coalition ("MIC") asking the Commission to remove the intraLATA scripting requirements for local exchange carriers other than Qwest. In this filing, Citizens Telecommunications Company of Minnesota, LLC and Frontier Communications of Minnesota, Inc. (collectively, "Frontier") submit their comments.

**Background**

MIC's petition describes the history of the various requirements of both this Commission and the Federal Communications Commission ("FCC"), regarding the procedures the local exchange carriers were to use when discussing equal access presubscription with customers. As MIC notes, these required procedures, and specifically the "scripting" or prescribed conversation that local exchange carriers were to engage in, come from a time when equal access was relatively new and customer understanding may have been limited.

The FCC at one time had scripting requirements for local exchange carriers to follow when they engaged in conversations with customers about interLATA equal access. In 2007, the FCC removed its scripting requirements for the Regional Bell Operating Companies (“RBOCs”) but retained the requirements for other local exchange carriers. In 2013, the FCC removed the scripting requirements for the other, non-RBOC local exchange carriers.

In a similar progression, this Commission removed intraLATA scripting requirements for Qwest in a 2008 order, but retained them for other local exchange carriers. The MIC petition now seeks to have the Commission continue on that regulatory trajectory, and remove the scripting obligations on the other remaining local exchange carriers.

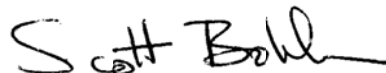
### **Discussion**

As noted above, the Commission’s intraLATA scripting requirements come from a time when equal access was relatively new and customer understanding may have been limited. Those times have long passed, and it is entirely appropriate that the Commission remove its requirements in light of the changed times. Frontier is not aware of any adverse consumer impacts from the previous relaxation of scripting requirements, either by the FCC or by this Commission.

Frontier urges the Commission to grant MIC’s petition and remove the intraLATA scripting requirements for local exchange carriers other than Qwest.

Dated February 13, 2014  
Respectfully submitted,

CITIZENS TELECOMMUNICATIONS COMPANY OF MINNESOTA, LLC  
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.



Scott Bohler  
Manager, Government and External Affairs  
2378 Wilshire Blvd.  
Mound, MN 55364  
(952) 491-5534 Telephone  
[scott.bohler@ftr.com](mailto:scott.bohler@ftr.com)