



Jason D. Topp
Associate General Counsel - Regulatory
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July 1, 2015

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 Qwest Corporation d/b/a CenturyLink's Proposal to
Increase Monthly Rates for Private and Semi-Private Directory Listings
Docket No. P-421/AM-15-417**

Dear Mr. Wolf:

Enclosed for filing are the Comments of Qwest Corporation d/b/a CenturyLink QC regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

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AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Dianne Barthel hereby certifies that on the 1st day of July, 2015, she e-filed a true and correct copy of the Comments of Qwest Corporation dba CenturyLink QC by posting it on www.edockets.state.mn.us. Said document was also served on the service list via U.S. mail and e-mail as designated with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel _____
Dianne Barthel

Subscribed and sworn to before me
this 1st day of July, 2015.

/s/ LeAnn M. Cammarata
Notary Public

My Commission Expires Jan 31, 2020

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-417_15-417
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_15-417_15-417
JoAnn	Hanson	joann.hanson@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-417_15-417
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-417_15-417
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-417_15-417
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_15-417_15-417

**STATE OF MINNESOTA
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COMMENTS OF QWEST CORPORATION D/B/A CENTURYLINK QC

On May 1, 2015, Qwest Corporation d/b/a CenturyLink QC (“CenturyLink QC”) filed modifications to its tariff prices providing for a \$1 monthly increase for Private and Semi-Private Directory Listings. CenturyLink QC provided notice to its customers in their May bills. On June 17, 2015, the Legal Services Advocacy Project (“LSAP”) filed comments and a recommendation that the Commission modify the tariff to include language waiving such costs for certain customers.

This Commission should reject the suggestions of LSAP. LSAP filed its proposed changes after the deadline for objections and its concerns about vulnerable customers are addressed through an existing state program with which CenturyLink QC is required to comply. The Commission should dismiss this docket and allow the tariff revisions to remain in effect.

I. LSAP’s OBJECTION SHOULD BE REJECTED AS UNTIMELY.

CenturyLink QC’s Second Revised Alternative Form of Regulation Plan (“AFOR”) classifies Private and Semi-Private Directory Listings as Price Regulated Services.¹ The

¹ AFOR, Appendix A, Schedule 1.

AFOR provides that “Interested parties shall have 30 days to file comments from the date of the initial filing...”² and that “[a]ny interested person may file an objection with the Commission or the Commission, on its own motion, may act within 30 days of the notice.”³

The deadlines in the AFOR were adopted pursuant to a statutory mandate that “[a]n alternative regulation plan must set forth the procedures under which the telephone company may . . . increase the rates or prices during the term of the plan.”⁴ The comments from LSAP fall beyond the 30 day time period. They are therefore untimely under the deadline set forth in the AFOR and must be rejected.

II. CENTURYLINK QC’S RATE CHANGES ARE APPROPRIATE.

The AFOR provides that “[CenturyLink QC’s] retail services are not subject to rate of return regulation or earnings investigations pursuant to sections 237.075 or 237.081 of Minnesota Statutes during the term of the Second Revised Plan.” Instead, it provides that “If, after receipt of a valid objection or upon its own motion,⁵ the Commission within 120 days of the date of notice makes specific findings based on substantial evidence demonstrating that [CenturyLink QC’s] proposal violates state law or Commission rules or is otherwise not in the public interest, it may disapprove the requested increase or approve a lesser increase.”⁶

LSAP’s points out that “for some of Legal Aid’s clients, non-published and non-listed numbers is[sic] not discretionary, it[sic] maintaining the confidentiality about their whereabouts is a matter of safety and, not infrequently, life or death, for themselves and their

² AFOR, Section IV.B.1.b, p. 7.

³ AFOR, Section IV.B.1.c, p. 7.

⁴ Minn. Stat. § 237.762. Subd. 3(a).

⁵ Note that the AFOR requires that the Commission act on its own motion within 30 days of the notice. AFOR, Section IV.B.1.c, p. 7.

⁶ AFOR, Section IV.B.1.c, p. 8.

children” and affects customers “who are often financially distressed and vulnerable.”⁷

LSAP recommends the Commission include a waiver for customers that can demonstrate they are victims of violence and recipients of public assistance or eligible for Legal Aid Services.

These suggested provisions are unnecessary. A customer who needs to protect the privacy of his or her name, address or telephone number may participate in an address confidentiality program administered by the Minnesota Secretary of State. The Minnesota Secretary of State’s Office offers an address confidentiality program in collaboration with local victim service providers to help survivors of domestic violence, sexual assault, stalking, or those who fear for their safety a confidential address.⁸ All Minnesota utilities are required to participate in this program. CenturyLink QC works with the Secretary of State’s Office to protect the privacy of its customers who are Safe at Home program participants. The account number, name, address and telephone number of program participants are not available in the phone directory or through Directory Assistance. CenturyLink QC customers who are Safe at Home program participants are not charged for having a non-published listing. Further, CenturyLink QC places a marketing restriction on participant’s accounts and provides free line-blocking service.

CenturyLink does not charge participants in that program for private listings regardless of income level. Adding additional language in the tariff to duplicate existing programs carries risks of inconsistencies between the language of the tariff and the terms of

⁷ Comments of Legal Services Advocacy Project re: Proposed Increases (June 17, 2015) (“LSAP Comments”), pp. 1-2.

⁸ For additional information about this program, please go to the Minnesota Secretary of State website. <http://www.sos.state.mn.us/index.aspx?page=1473>.

an existing program. LSAP's concerns about the availability of protection for vulnerable customers need not be addressed in this proceeding.

CONCLUSION

LSAP did not file comments in a timely fashion with respect to this price modification. Its concerns are addressed by existing state programs. The Commission should close this docket and allow CenturyLink QC's tariff revisions to remain in place.

Dated this 1st day of July, 2015.

QWEST CORPORATION DBA
CENTURYLINK QC

/s/ Jason D. Topp
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