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July 30, 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 Wholesale Service Quality Standards
Docket No. P-421/M-00-849**

Dear Mr. Wolf:

Enclosed for filing please find the Reply Comments of Qwest Corporation dba CenturyLink QC regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

**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

**Re: In the Matter of Qwest Wholesale Service Quality Standards
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AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Dianne Barthel hereby certifies that on the 30th day of July, 2015, she e-filed a true and correct copy of the Reply Comments of Qwest Corporation dba CenturyLink QC attached letter 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 June, 2015.

/s/ LeAnn M. Cammarata
Notary Public

My Commission Expires Jan 31, 2020

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

Beverly Jones Heydinger	Chair
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In the Matter of Qwest Wholesale Service Docket No. P-421/M-00-849
Quality Standards

**REPLY COMMENTS OF
QWEST CORPORATION DBA CENTURYLINK QC**

Qwest Corporation dba CenturyLink QC (CenturyLink) submits these reply comments in support of its June 1, 2015 filing requesting that the Commission discontinue CenturyLink's wholesale service quality plan (WSQ). As stated in its petition, CenturyLink believes the time has arrived when the WSQ has outlived its usefulness and has become obsolete, if not irrelevant, in today's competitive market. No CLEC is currently opted into the WSQ and only the state aggregate report is filed with the Commission.

It is notable that no party recommended that the Commission reject CenturyLink's petition. This lack of opposition demonstrates the marginal value that such a plan provides in Minnesota. While it took no position on CenturyLink's request, the Department of Commerce (Department) raised a few issues in its comments that this reply will address.

**1. The Differences in Performance Measurements discussed by the
Department are insignificant.**

The Department identifies two differences between the WSQ plan and the Minnesota Performance Assurance Plan (MPAP). First, it states that the measurements contained in the WSQ differ slightly from the MPAP. This assertion, while technically true at this moment, is

a temporary situation caused by the uncertainty associated with the status of CenturyLink's request to discontinue the WSQ.

Unless the Commission radically alters its past approach, the statistical information in each plan will be identical moving forward. The WSQ and the MPAP are designed to be identical. Section 15.7 of the WSQ provides that changes agreed upon by the industry related to performance measurements will be incorporated into the WSQ.¹ The reason the measurements differ somewhat at this time is because changes to the performance measurements that have been made to the MPAP have not yet been incorporated into the WSQ pending resolution of this issue.² Thus, any differences in measurements at this time are temporary and not significant. For all practical purposes, the products and services measured by both plans are identical.

The second difference discussed by the Department, between parity and benchmark measurements, is not as significant as the Department suggests. In reviewing the importance of these benchmarks, the Commission should consider the fact that (1) the benchmarks have not been an issue in any proceeding before this Commission in the 12 years the WSQ has been in place; (2) CLECs have the ability to file a complaint with this Commission in the event performance falls to unacceptable levels; (3) the Department and Commission have the ability to investigate in the event performance falls and can do so with the data provided in

¹ In 2008, the Commission ordered identical changes to both plans based on a stipulation between the parties. Order Approving Stipulation and Establishing a Comment and Reply Comment Period, *In the Matter of Qwest's Performance Assurance Plan* and *In the Matter of Qwest's Wholesale Quality Standards*, Dkt. Nos. P-421/M-01-1376 and P-421/M-00-849 (Feb. 14, 2008).

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={6009B2E2-66F1-4242-BF6A-88C7C579168A}&documentTitle=4943293>.

² Order, *In the Matter of Qwest Corporation d/b/a CenturyLink QC Petition for Modification of Minnesota Performance Assurance Plan to Make it Consistent with Settlement Agreement*, Dkt. No. P-421/AM-13-733 (Oct. 25, 2013).

the MPAP performance reports; and (4) benchmarks will not go away entirely – the MPAP contains benchmarks where an appropriate retail comparison does not exist.

2. Benefit v. Burden.

The Department also asks the Commission to consider whether the benefits associated with the WSQ are worth the burden and suggests that CenturyLink has not provided data or support for the burden that maintaining two plans imposes.

The Commission can gain a sense of the burden simply by taking a look at the extensive filings that must be repeated by filing the same data twice. The docket sheet for the MPAP proceeding reflects 1,434 filings as of July 23, 2015.³ The docket sheet for the WSQ docket shows 883 filings.⁴ Simply loading the dockets on the computer is a slow process. The majority of the filings in each docket are performance reports and each performance report encompasses pages and pages of data. Most of that data is repeated between the dockets and it is unclear whether much of it is scrutinized.

In addition, discontinuing the WSQ will allow CenturyLink to avoid the costs of modifying the plan for the changes made in the Redesigned MPAP ordered by the Commission in October 2013 (Docket P-421/AM-13-733). Section 15.7 of the WSQ (October 21, 2002), reads: “If any agreements on adding, modifying or deleting applicable performance measurements are reached between Qwest and CLECs participating in an industry Regional Oversight Committee (ROC) PID administration forum, these agreements shall be incorporated into the MN WHSQ Plan and modify the agreement between CLEC

³ See *In the Matter of Qwest's Performance Assurance Plan*, Dkt. No. P-421/M-01-1376 (retrieved July 23, 2015).

⁴ See *In the Matter of Qwest's Wholesale Quality Standards*, Dkt. No. P-421/M-00-849 (retrieved July 23, 2015).

and Qwest at any time those agreements are submitted to and approved by the Commission, whether before or after a six month review.”

When the changes were ordered by the Commission back in 2008, changes to the Exhibit B PIDs were flowed through to the WSQ metrics. Accordingly, CenturyLink has also been preparing to flow the changes of the Redesigned MPAP Exhibit B through to the WSQ metrics based on Section 15.7, but has delayed implementation pending the outcome of this petition.

As CenturyLink implements the Redesigned MPAP changes into the WSQ, the resulting WSQ would not be significantly different from the Redesigned MPAP itself. As described in detail below, PIDs would provide nearly identical data in the MPAP and the WSQ reports after the changes, although in a few cases the standard may be slightly different.

For example, a quick count of the PIDs and products that would remain in the WSQ following the conversion shows that almost 60% of them would be identical or nearly identical to those measured in the Redesigned MPAP:

- Several PIDs are diagnostic in both the WSQ and the MPAP: PO-1 IMA GUI, PO-1 XML, PO-1D, PO-2A, PO-2B, PO-3C, PO-3X, OP-15, BI-2, BI-3, BI-4, DB-1, and CP-2
- Many PIDs use parity standards in both the WSQ and the Redesigned MPAP: OP-5A (EEL-DS1, Unbundled ADSL Loops); MR-5A, MR-5B (EEL-DS1); MR-6A,MR- 6B, MR-6C (Residence); MR-6D, MR-6E (LIS Trunk, Unbundled Analog, Unbundled 2W-NL, Unbundled DS1 Capable, Unbundled XDSL_i, Unbundled ADSL, EEL-DS1); MR-7D, MR-7E (Unbundled XDSL_i, Unbundled ADSL, EEL-DS1), and; MR-8 (LIS Trunk, Unbundled Analog, Unbundled 2W-NL, Unbundled DS1 Capable, Unbundled XDSL_i, Unbundled ADSL, EEL-DS1).

- There are PIDs in the Redesigned MPAP with benchmarks standards that mirror those found in the WSQ: OP-3A, OP-3B, OP-3C (EEL-DS1, Unbundled ADSL Loops - 90% benchmark); OP-3D, OP-3E (EEL-DS1 - 90% standard); OP-4A, OP-4B, OP-4C (Sub-loops - 6-day standard); OP-4D, OP-4E (EEL-DS1s - 6-day standard); OP-8 (95% standard); PO-5A (Resale services, Unbundled Loops, Unbundled Network Elements, and LNP - 95% standard); PO-5B, PO-5C (Resale services, Unbundled Loops, Unbundled Network Elements, and LNP - 90% standard), and; PO-5D (LIS Trunks - 85% standard).
- A few other PIDs in the Redesigned MPAP use benchmarks standards that are very similar to those found in the WSQ: OP-3D, OP-3E (Unbundled Analog, Unbundled 2W-NL, Unbundled ADSL Loops use a 95% standard in the WSQ and a 90% standard in the MPAP); OP-4D, OP-4E (Unbundled Analog, Unbundled 2W-NL, Unbundled ADSL, use a 5 day standard in the WSQ and a 6 day standard in the MPAP), and; OP-4D, OP-4E (Unbundled DS1 Capable loops use a 5 day standard in the WSQ and a 5.5 day standard in the MPAP).

The remaining 40% of the PIDs and products display identical performance results in both the WSQ and MPAP; the only difference is in the standard that is applied (i.e., the measurement might be diagnostic in the WSQ but might be a parity measurement in the MPAP, for example). After re-alignment, the WSQ will contain redundant numerators, denominators and calculated performance results for all the PIDs that the MPAP already contains.

Rather than align the changes ordered by the Commission in the Redesigned MPAP into the WSQ, CenturyLink would like to forgo the expense of the conversion by discontinuing the WSQ altogether, for the reasons mentioned above.

A related issue regarding the WSQ is that the “pdf generator” that has been creating the pdf-formatted reports for filing each month since the reports first began is no longer supported. If the WSQ report is not discontinued, CenturyLink must implement a new method of generating the reports, likely transitioning the WSQ’s report from a pdf format to

an Excel spreadsheet format. For a short time, both formats of reports will have to be run to ensure validation and verification of results. Unfortunately, it would be the same personnel performing this validation that performs validation of the Redesigned MPAP performance results and payment calculations for integrity and accuracy. Rather than convert the report format, CenturyLink would prefer to forgo the expense of the format conversion by discontinuing the WSQ.

CONCLUSION

CenturyLink believes that any benefits associated with duplicate reports are minimal. It respectfully requests that the Commission discontinue the wholesale service quality plan.

Dated this 30th day of July, 2015.

**QWEST CORPORATION D/B/A
CENTURYLINK QC**

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