



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

October 12, 2020

Mr. Connor Boler
MN Department of Commerce
85 Seventh Place East, Suite 500
St. Paul, MN 55101-2198

Re: MPUC Docket No. P-6312, 421/IC-20-522

Dear Mr. Boler:

Enclosed are CenturyLink's Responses to the Department of Commerce's Information Request Nos. 6-10 regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosure

cc: Bruce Linscheid
Lisa Gonzalez
Greg Doyle

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

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

Re: MPUC Docket No. P-6312, 421/IC-20-522

CERTIFICATE OF SERVICE

Dianne Barthel hereby certifies that on the 12th day of October, 2020, she served the annexed filing of CenturyLink on the parties identified on the filing letter, by electronic mail, directed to said addressees at their last known email addresses.

/s/ Dianne Barthel

Dianne Barthel

Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Docket Number: P-6312, 421/IC-20-522 Nonpublic Public
Date of Request: 09/11/2020
Response Due: 09/21/2020

Requested From: Jason Topp
CenturyLink Communications, LLC
Jason.topp@centurylink.com

Type of Inquiry: General

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Bruce Linscheid; Lisa Gonzalez; Greg Doyle

Email Address(es): bruce.linscheid@state.mn.us; lisa.gonzalez@state.mn.us; greg.doyle@state.mn.us

Phone Number(s): 651-539-1881; 651-539-1880; 651-539-1850

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 6
Topic: CenturyLink and KTF
Reference(s): Click or tap here to enter text.

Request:

Please provide a complete list of the customer locations where CenturyLink's network currently provisions service to KTF retail customers.

Response:

CenturyLink does not provide service to KTF customers. KTF should be able to provide the location of its customers. Generally, however, KTF appears to offer service in the following wire centers:

Mora
Pine City
Rush City

To be completed by responder

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Request Number: 7
Topic: CenturyLink and KTF
Reference(s): Click or tap here to enter text.

Request:

If CenturyLink is aware of the retail service(s) that KTF provisions to each of the locations identified in information request number 6, please identify those services for each location.

Response:

See response to Information Request No. 6. CenturyLink objects to this request as seeking information related to information services over which the Commission does not have jurisdiction. KTF could provide information on the retail services it offers.

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Request Number: 8
Topic: CenturyLink and KTF
Reference(s): Click or tap here to enter text.

Request:

Please provide a complete list of internet service providers (ISPs) currently offering internet service to each of the locations identified in information request number 6 and the technology each entity uses to offer internet service at each location.

Response:

Not applicable. See response to Information Request No. 6. CenturyLink objects to this request as seeking information related to information services over which the Commission does not have jurisdiction. Notwithstanding and without waiving this objection, please follow the links below for a listing of broadband providers by county:

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Broadband Providers by County:

- [PDF](#)
- [Excel](#)

Availability of Wireline Broadband Service by County:

- [PDF](#)
- [Excel](#)

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Request Number: 9
Topic: CenturyLink and KTF
Reference(s): Click or tap here to enter text.

Request:

Regarding the list of ISPs, if any, that CenturyLink states will provide internet service at each of the locations identified in information request number 6, please state whether CenturyLink confirmed with the provider that it is willing and able to provide service at that location.

Response:

CenturyLink objects to this request as seeking information related to information services over which the Commission does not have jurisdiction. Notwithstanding and without waiving these objections, see responses to Information Request Nos. 6 and 8. According to the data provided by the state (linked in response to Information Request No. 8), multiple options exist in each affected county.

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Request Number: 10
Topic: CenturyLink and KTF
Reference(s): Click or tap here to enter text.

Request:

If CenturyLink did not confirm that an ISP is willing and able to provide service at the locations identified in information request number 6, provide any other support that CenturyLink has for its claim that KTF's remaining customers "will be best served by having another provider."

Response:

The term "service" insofar as it is relevant to this proceeding and the Commission's jurisdiction involves voice service.

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Multiple providers offer voice service in these wire centers as the Commission found in its analysis of competitive market regulation.¹

If the customers fall within CenturyLink’s technical parameters for offering internet service, CenturyLink will do so. Based on state data referenced in response to Information Request No. 8, multiple providers offer broadband service in each county where KTF appears to offer service:

Pine County – 13 providers
Chisago County – 13 providers
Kanabec County – 15 providers

CenturyLink does not have access to coverage data from other providers, but the independent website linked below suggests that nearly all customers will have options to purchase broadband access, although the speed may be below 25/3:

<https://broadbandnow.com/>

¹ *In the Matter of the Petition of CenturyLink QC to be Regulated Pursuant to Minn. Stat. § 237.025; Competitive Market Regulation, Order Granting Petition in Part, Dkt No. P-421/AM-16-496 (May 22, 2017).*

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