



Jason D. Topp
Assistant General Counsel
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June 26, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of Local Service Providers' Filings under Minnesota Rules
7812.0600 and 7811.0600
Docket Nos. P-999/CI-20-359, P-6422/M-20-354, and P-6236/M-20-259**

Dear Mr. Seuffert:

Enclosed for filing are the Supplemental Comments of Qwest Corporation dba CenturyLink QC regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

JDT/bardm

Enclosure

cc: Service List

200 South 5th Street, Suite 2200
Minneapolis, MN 55402

www.centurylink.com

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

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

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CERTIFICATE OF SERVICE

Dianne Barthel hereby certifies that on the 26th day of June, 2020, she e-filed a true and correct copy of the annexed filing by posting it on www.edockets.state.mn.us. Said document was also served on the service list via e-mail as designated with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel
Dianne Barthel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dianne	Barthel	Dianne.barthel@centurylink.com	Centurylink Communications, LLC	200 South Fifth Street Room 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-259_M-20-259
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_20-259_M-20-259
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-259_M-20-259
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-259_M-20-259
Andrew	Schriner	andrew.schriner@centurylink.com	Centurylink Communications, LLC	200 South 5th Street Room 2100 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-259_M-20-259
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-259_M-20-259
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-259_M-20-259

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_20-354_M-20-354
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-354_M-20-354
Dan	Craigie	daniel.craigie@state.mn.us	Department of Public Safety	445 Minnesota St. Suite 1725 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-354_M-20-354
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Pete	Eggimann	PEGGIMANN@MN-MESB.ORG	Metropolitan Emergency Services Board	2099 University Ave W Ste 201 St. Paul, MN 551043431	Electronic Service	No	OFF_SL_20-354_M-20-354
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-354_M-20-354
Carey	Gagnon	carey.gagnon@verizonwireless.com	Verizon Wireless	3131 S Vaughn Way #550 FL 5 Aurora, CO 80014	Electronic Service	No	OFF_SL_20-354_M-20-354
Shannon	Heim	shannon.heim@lawmoss.com	Moss & Barnett A Professional Association	150 S. 5th Street, Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-354_M-20-354
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-354_M-20-354
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-354_M-20-354

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dana	Wahlberg	dana.wahlberg@state.mn.us	Department of Public Safety	Town Square Ste 137 444 Cedar St St. Paul, MN 551015126	Electronic Service	No	OFF_SL_20-354_M-20-354

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_20-359_Official
Brent	Christensen	bchristensen@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_20-359_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-359_Official
Shannon	Heim	shannon.heim@lawmoss.com	Moss & Barnett A Professional Association	150 S. 5th Street, Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-359_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-359_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-359_Official
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-359_Official

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

Qwest Corporation dba CenturyLink QC (“CenturyLink”) submits these comments in response to the Commission’s Notice of Supplemental Comment Period issued May 29, 2020 (“Notice”) regarding proposed changes to the process for discontinuing regulated voice services for business customers.

CenturyLink was the only party that filed comments in earlier stages of this proceeding and suggested that current processes are unduly burdensome and unnecessary in today’s telecommunications marketplace. Currently, business customers purchase a patchwork of regulated and unregulated services with the percentage of unregulated services growing each year. Providers need to adapt to a highly competitive marketplace and burdensome restrictions on adjustments to service offerings serves to hamper providers that offer regulated business voice service to customers.

Staff proposals would help reduce that imbalance and eliminates customer protections that are not necessary for business customers. CenturyLink will provide limited comments on this set of proposals and will reply as needed when others comment.

The Notice asks for comment on the following topics:

1) Should the Commission clarify, or in the alternative vary Minn. R. 7812.0600, subpart 1A and 6 so that a local service provider discontinuing a regulated voice service for business customers:

- a) need only provide notification to the business customers, not receive affirmative confirmation from each individual customer that they have transitioned service to another provider; and**
- b) may provide a notice to the Commission, Department, and Office of Attorney General, and its customers at least 60 days in advance, if it is retaining its authority but discontinuing a regulated voice service for business customers? Should the carrier be allowed to carry out that discontinuance without affirmative approval from the Commission, if no objections or concerns are raised in comments within 60 days?**
- c) need not only identify LSPs available to those customers, but both LSPs and any other unregulated options known to the carrier? (See the last sentence of Minn. Rules 7812.0600, Limitations on Exit.)**

CenturyLink addressed these topics in its initial comments and suggested that the FCC process should be adequate and that notice alone should be adequate at the state level.

Staff's recommendations are an acceptable compromise. A notification process for discontinuing regulated voice service 60 days after notice to business customers and state agencies if no objection is raised. Consistent with its prior comments, CenturyLink further recommends that the requirement in the last sentence of Minn. R 7812.0600 requiring a list of available local service providers be eliminated.

2) Should the Commission clarify that the notice to customers required under 7812.0600 subp. 6 shall list contact information for the Consumer Affairs Office?

CenturyLink takes no position on this proposal.

- 3) Commenters should provide additional information, including but not limited to:**
- a) other state commissions' requirements for discontinuing local regulated voice service to business customers;**
 - b) whether it is relevant that these services go through an FCC approval process. The scope of these questions does not include relinquishment of a carrier's certificate of authority, nor obligations of an ETC.**

In most states, Commission approval is not necessary for discontinuing business services. While the analysis can vary depending on circumstances, CenturyLink identified nine states that

require any sort of filing beyond normal tariff change filings (CA, CT, DC, IL, MD, MI, NY, PA and WA). Of those, only four require approval of a petition (CT, DC, MI and PA). Most states have recognized that burdensome requirements for withdrawing a service are no longer necessary in light of FCC processes and the many competitive options available to such customers.

Dated this 26th day of June, 2020.

QWEST CORPORATION dba
CENTURYLINK QC

/s/ Jason D. Topp
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Minneapolis, MN 55402
(651) 312-5364