



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

March 3, 2021

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

**Re: In the Matter of the Petition of CenturyLink Communications, LLC for
Designation as an Eligible Telecommunications Carrier**

Dear Mr. Seuffert:

Enclosed for filing are CenturyLink Communications, LLC/s Original Filing, Summary of Filing, and Petition for Designation as an Eligible Telecommunications Carrier regarding the above-referenced matter.

We apologize for filing this application after February 19 and respectfully request that the Commission nonetheless complete its review in time to meet the June 7 deadline set by the FCC to authorize the release of Rural Development Opportunity Fund (RDOF) payments.

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

Re: In the Matter of the Petition of CenturyLink Communications, LLC for Designation as an Eligible Telecommunications Carrier

CERTIFICATE OF SERVICE

Mary Holly hereby certifies that on the 3rd day of March, 2021, 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/ Mary Holly

Mary Holly

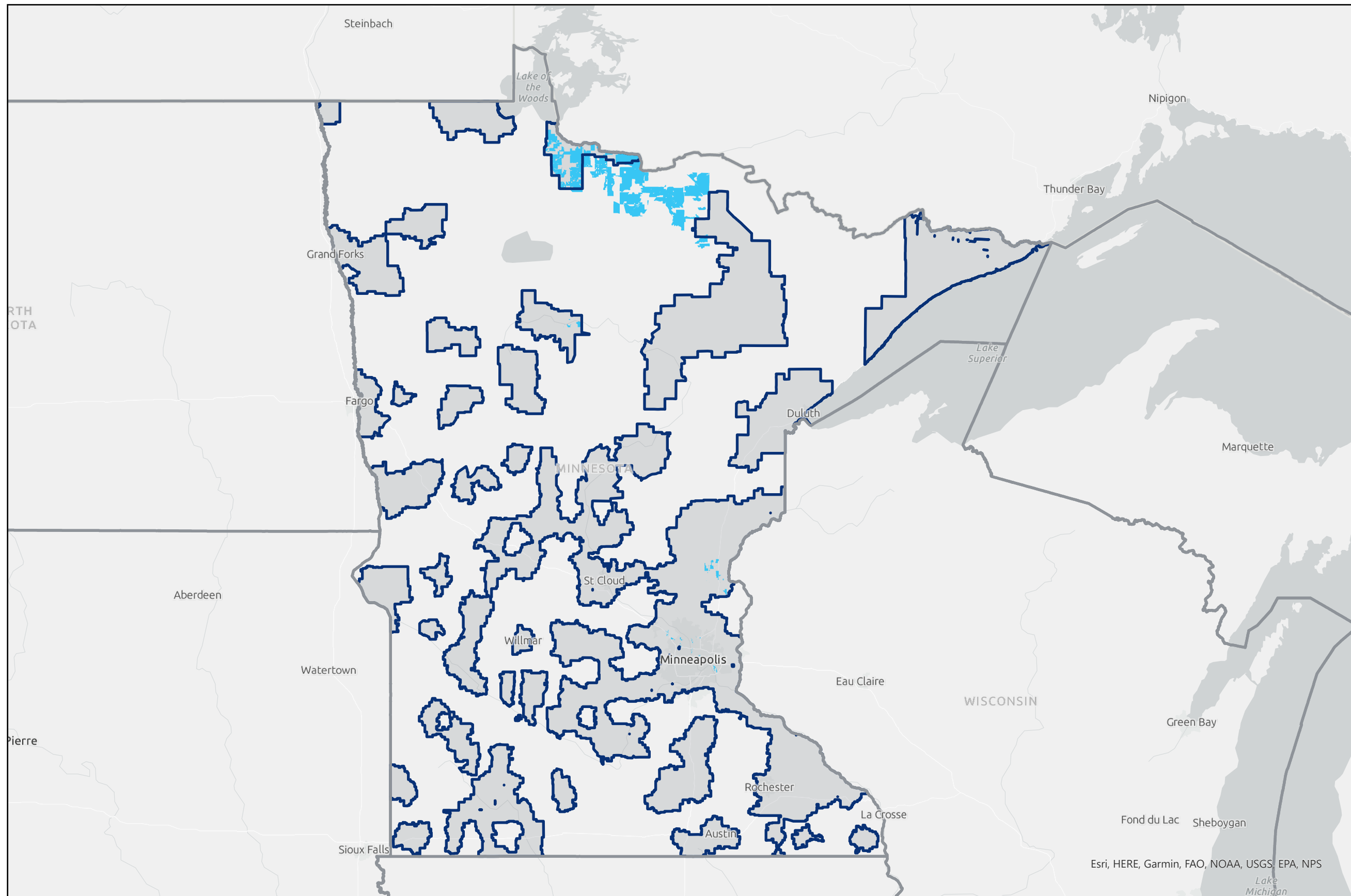
First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@jagcom.net	Jaguar Communications, Inc.	213 S Oak Ave Ste 2000 Owatonna, MN 55060	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Greg	Arvig	GARVIG@NEXTERA.NET	Nextera Communications	Suite 100 7115 Forthum Rd Baxter, MN 56425	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
John	Barnicle	jbarnicle@peerlessnetwork.com	Peerless Network of Minnesota, LLC	222 S. Riverside Plaza, ste 2730 Chicago, IL 60606	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Kyle	Bertrand	kyle.bertrand@inteliquent.com	Onvoy, LLC	550 W Adams St Ste 900 Chicago, IL 60661	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Mark	Birkholz	mark.birkholz@arvig.com	Redwood County Telephone Company	150 2nd Ave SW Perham, MN 56573	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Geoff	Bloss	gbloss@bcmone.com	BCM One, Inc.	295 Madison Ave FL 5 New York, NY 10017	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Jenna	Brown	jbrown@vcmsolutions.com	QuantumShift Communications, Inc	12657 Alcosta Blvd Ste 418 San Ramon, CA 94583	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Gary	Case	gary.case@verizon.com	Verizon	600 Hidden Ridge Irving, TX 75038	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition

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	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
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	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Shira	Cook	shira.cook@zayo.com	Zayo Group, LLC	1805 29th St Ste 2050 Boulder, CO 80301	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Corbin	Coombs	cc2862@att.com	AT&T Corp.	225 West Randolph Street Z2 Room 17A140 Chicago, IL 60606	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Heather	Dobson	heather.dobson@charter.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Dr St Louis, MO 63131	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Andoni	Economou	aeconomou@mettel.net	Metropolitan Telecommunications of Minnesota, Inc.	55 Water St FL 31 New York, NY 10041	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Carey	Gagnon	carey.gagnon@verizon.com	Verizon	3131 S Vaughn Way 5th Floor Aurora, CO 80014	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
John	Harrington	jharrington@inteliquent.com	Neutral Tandem-Minnesota	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition


First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joe	Hartman	joe.hartman@acninc.com	ACN Communications Services, Inc.	1000 Progress PI NE Concord, NC 28025	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Stacey	Hines	stacey.hines@chartercom.com	Charter Fiberlink CC VIII, LLC	12405 Powerscourt Drive St. Louis, Missouri 63131	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Ruth	Holder	ruth.holder@bt.com	BT Communications Sales LLC	11440 Commerce Park Dr Reston, VA 20191	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Julian	Jacquez	jjacquez@bcntele.com	BCN Telecom, Inc.	1200 Mt. Kemble Ave. 3rd Fl. Harding Township, NJ 07960	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Gary	Johnson	gjohnson@paulbunyan.net	Paul Bunyan Rural Telephone Coop.	P.O. Box 1596 1831 Anne Street NW Bemidji, MN 56601	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Jim	Lundberg	jcl@velocitytelephone.com	Velocity Telephone Inc	656 Mendelssohn Ave N Golden Valley, MN 55427	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Laurie	McDonough	laurie.mcdonough@acninc.com	ACN Communication Services, Inc.	1000 Progress Place Concord, NC 28025	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Sadia	Mendez	smendez@bcmone.com	BCM One, Inc.	521 5th Ave FL 14 New York, NY 10175	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stephen	Meradith	WCI.Minnesota.govaffairs@windstream.com	McLeod USA Telecommunications Services, LLC	Windstream Communications 4001 Rodney Parham Rd Little Rock, AR 72212	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Richard	Monto	rmonto@inteliquent.com	Neutral Tandem-Minnesota, LLC	550 West Adams Street, Suite 900 Chicago, IL 60661	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Bruce A	Ney	bruce.ney@att.com	AT&T Services, Inc.	816 Congress Ave Ste 1100 Austin, TX 78701	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Doug	Osborne	dosborne@localaccessllc.com	Local Access LLC	11442 Lake Butler Blvd Windermere, FL 34786	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Jack D.	Phillips	jack.phillips@ftr.com	Frontier Communications Of MN, Inc.	14450 Burnhaven Drive Burnsville, MN 55306	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
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	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Robert	Russell	brussell@dmv.com	Local Access LLC	11442 Lake Butler Boulevard Windermere, FL 34786	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition


First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Sichler	lsichler@bullseyetelecom.com	Bullseye Telecom	25925 Telegraph Rd Ste 210 Southfield, MI 48033	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Christie	Turn	cturn@paulbunyan.net	Paul Bunyan Rural Telephone	1831 Anne St NW Bemidji, MN 56601	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Alex	Valencia	avalencia@impacttelecom.com	Matrix Telecom, LLC	400 Las Colinas Blvd E Ste 500 Irving, TX 75039	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Nancy A.	Vogel	nancy.vogel@midco.com	Midcontinent Communications	3901 N Louise Ave Sioux Falls, SD 57107	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Curtiss	Wikstrom	curtw@wiktel.com	Wikstrom Telephone Company	PO Box 217 212 South Main St Karlstad, MN 56732-0217	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition
Brian	Witte	bw8912@att.com	Teleport Communications America, LLC	C/O Global Connects / AT&T Corp. One AT&A Way Rm 4A252B Bedminster, NJ 07921	Electronic Service	No	GEN_SL_CenturyLink Communications, LLC dba Lumen Technologies_CenturyLink Communications ETC Petition



Support (10y)	Locations
\$15,646,093.10	3,265

 Lumen Serving Area

Winning Bidder

 CenturyLink, Inc.

Esri, HERE, Garmin, FAO, NOAA, USGS, EPA, NPS
Lake Michigan

Winning bidder Rural Digital Opportunity Fund (RDOF) information: RDOF Source: <https://auctiondata.fcc.gov/public/projects/auction904>. Portions of the map data are ©2006-2020 TomTom and portions of the map data are ©2020 Lumen.

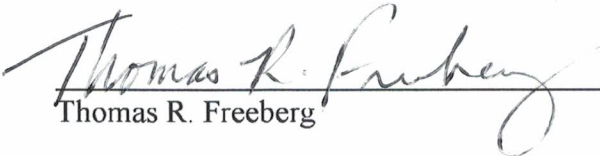
Exhibit B
CenturyLink Communications, LLC
Minnesota Incremental Census Blocks

270030511011007	270717903002174	270717903002318	270717905002205	270774604002281
270079400021155	270717903002175	270717903002326	270717905002207	270774604002288
270717903002010	270717903002176	270717903002327	270717905002208	270774604002471
270717903002014	270717903002178	270717903002328	270717905002212	270774604002586
270717903002015	270717903002179	270717903002329	270717905002214	270774604002728
270717903002017	270717903002181	270717903002331	270717905002216	
270717903002018	270717903002185	270717903002333	270717905002226	
270717903002019	270717903002186	270717903002375	270717905002237	
270717903002020	270717903002187	270717903002381	270717905002251	
270717903002021	270717903002190	270717903002385	270717905002252	
270717903002022	270717903002194	270717903002386	270717905002254	
270717903002023	270717903002198	270717903002387	270717905002255	
270717903002025	270717903002199	270717903002404	270717905002256	
270717903002028	270717903002200	270717903002406	270717905002257	
270717903002029	270717903002202	270717903002412	270717905002258	
270717903002041	270717903002204	270717903002414	270717905002264	
270717903002042	270717903002208	270717903002415	270717905002267	
270717903002043	270717903002211	270717903002416	270717905002268	
270717903002046	270717903002212	270717903002418	270717905002273	
270717903002047	270717903002213	270717903002419	270717905002274	
270717903002048	270717903002214	270717903002422	270717905002275	
270717903002051	270717903002215	270717905002001	270717905002277	
270717903002053	270717903002216	270717905002002	270717905002278	
270717903002055	270717903002218	270717905002063	270717905002286	
270717903002057	270717903002219	270717905002086	270717905002287	
270717903002059	270717903002223	270717905002112	270717905002290	
270717903002060	270717903002237	270717905002117	270717905002291	
270717903002063	270717903002252	270717905002142	270717905002292	
270717903002064	270717903002272	270717905002161	270717905002299	
270717903002067	270717903002284	270717905002167	270717905002301	
270717903002068	270717903002285	270717905002168	270717905002307	
270717903002074	270717903002286	270717905002170	270717905002311	
270717903002079	270717903002288	270717905002171	270717905002314	
270717903002080	270717903002293	270717905002174	270717905002315	
270717903002081	270717903002294	270717905002176	270717905002325	
270717903002084	270717903002299	270717905002177	270717905002330	
270717903002090	270717903002300	270717905002187	270717905002339	
270717903002091	270717903002302	270717905002188	270717905002340	
270717903002094	270717903002303	270717905002190	270717905002341	
270717903002097	270717903002304	270717905002191	270717905002346	
270717903002099	270717903002305	270717905002192	270717905002361	
270717903002100	270717903002309	270717905002194	270774603001230	
270717903002101	270717903002311	270717905002197	270774603001273	
270717903002105	270717903002314	270717905002199	270774603001276	
270717903002111	270717903002315	270717905002201	270774604002005	

VERIFICATION

I, Thomas R. Freeberg, state as follows:

1. I am the Director of Public Policy of Lumen Technologies, Inc., and I am authorized to make this Verification on behalf of the Company;
2. The foregoing petition was prepared under my direction and supervision; and
3. I certify or declare under penalty of perjury under the Laws of the State of Minnesota that the foregoing is true and correct to be best of my knowledge, information and belief.


Thomas R. Freeberg

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

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

In the Matter of the Petition of CenturyLink Communications, LLC for Designation as Eligible Telecommunications Carrier **MPUC Docket No. _____**

ORIGINAL FILING

CenturyLink Communications, LLC (“CLC”) requests the Minnesota Public Utilities Commission (“Commission”) approve its designation as an Eligible Telecommunications Carrier (“ETC”) for those areas awarded to CLC in the Federal Communications Commission (“FCC”) Rural Digital Opportunity Fund Auction outside the incumbent service territory of its affiliates.

The filing includes the following attachments:

- | | |
|--------------|---|
| Attachment 1 | One paragraph summary of the filing in accordance with Minn. Rules pt. 7829.1300. |
| Attachment 2 | Petition to designate CLC’s service area as an Eligible Telecommunications Carrier, which contains a description of the filing, the impact on Petitioner and affected ratepayers, and the reasons for the filings, provided in accordance with Minn. Rules pt. 7829.1300, subp. 4(F). |
| Attachment 3 | Certificate of Service. |

In addition, the following information is provided, in accordance with Minn. Rules pt. 7829.1300, subp. 4:

Utility:	CenturyLink Communications, LLC 100 CenturyLink Drive Monroe, LA 71203
Date of Filing:	March 3, 2021

Controlling Statute for Time
In Processing Filing:

Minn. Rules pt. 7811.1400, subp. 12

If additional information is required, please contact me at 651-312-5364.

/s/ Jason D. Topp

Jason D. Topp
Assistant General Counsel

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

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

**In the Matter of the Petition of CenturyLink
Communications, LLC for Designation as an
Eligible Telecommunications Carrier**

MPUC Docket No. _____

SUMMARY OF FILING

CenturyLink Communications, LLC’s (“CLC”) ultimate parent, Lumen Technologies, Inc. (f/k/a CenturyLink, Inc.) (“CenturyLink/Lumen”) was the winning bidder in some census blocks that were available in the State of Minnesota under the FCC Rural Digital Opportunity Fund (“RDOF”) Phase I Auction.¹ CenturyLink/Lumen assigned those bids to its affiliate, Qwest Communications, which filed a long-form application on behalf of itself and its affiliates in Minnesota. Collectively, they have the necessary status as Eligible Telecommunications Carriers (“ETCs”) in most of the covered census blocks, but not in a relatively small number that fall outside of CenturyLink/Lumen local exchange boundaries (the “Incremental CBs”). The plan is for CLC to take responsibility for RDOF deployment and compliance in the Incremental Census Blocks as it is authorized to provide service. Because CLC presently is not a designated ETC in Minnesota, CLC requests the Minnesota Public Utilities Commission grant its petition for designation as an ETC in the Incremental Census Blocks.

¹ *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced*, Public Notice, DA No. 20-1422 (OEA/WCB rel. Dec. 7, 2020) (“*Auction 904 Results Notice*”). See, <https://docs.fcc.gov/public/attachments/DA-20-1422A1.pdf>.

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

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

**In the Matter of the Petition of CenturyLink
Communications, LLC for Designation as an
Eligible Telecommunications Carrier**

MPUC Docket No. _____

**PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

Pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),² Sections 54.201 and 54.202 of the rules and regulations of the Federal Communications Commission (“FCC”),³ and the Orders of this Commission, CenturyLink Communications, LLC (“CLC”) hereby submits this Petition (“Petition”) to the Minnesota Public Utilities Commission (“Commission”) seeking designation as an eligible telecommunications carrier (“ETC”) in selected census blocks outside areas where its affiliates are currently ETCs.⁴ CLC respectfully requests that the Commission issue an order designating CLC as an ETC in the state of Minnesota no later than June 1, 2021, pursuant to the Act,⁵ Sections 54.201 and 54.202 of the rules and regulations of the FCC,⁶ and the Orders of this Commission, or order any other relief on a timely basis as may be appropriate. In support of this Petition, CLC states as follows:

² 47 U.S.C. § 214(e)(2).

³ 47 C.F.R. §§ 54.201 and 54.202.

⁴ CLC’s incumbent local exchange company (“ILEC”) affiliate, namely, CenturyTel of Minnesota, Inc. d/b/a CenturyLink, Qwest Corporation d/b/a CenturyLink QC, and Embarq Minnesota, Inc. d/b/a CenturyLink are designated as ETCs in Minnesota. As addressed more fully below, this Petition involves areas outside the service territory served by these ILEC affiliates of CLC.

⁵ 47 U.S.C. § 214(e)(2).

⁶ 47 C.F.R. §§ 54.201 and 54.202.

CLC is an indirect, wholly owned subsidiary of CenturyLink/Lumen. Lumen provides high-quality voice and data services to enterprise, government, wholesale, and carrier customers over its IP-based network through its wholly owned indirect subsidiaries, including CLC.

CLC's ultimate parent, Lumen Technologies, Inc. (f/k/a CenturyLink, Inc.) (hereinafter "CenturyLink/Lumen"),⁷ was selected as a winning bidder in some of the census blocks available in Minnesota under the FCC's Rural Digital Opportunity Fund Phase I Auction (Auction 904) ("RDOF Auction").⁸ CenturyLink/Lumen relies upon its certificated affiliates in Minnesota for implementation of RDOF bids within its service territory. These affiliates, CenturyTel of Minnesota, Inc. d/b/a CenturyLink, Qwest Corporation d/b/a CenturyLink QC and Embarq Minnesota, Inc. d/b/a CenturyLink ("CenturyLink Affiliates"), are local exchange carriers ("LEC") and ETCs in Minnesota, and most of the RDOF census blocks won by CenturyLink/Lumen in Minnesota fall within its authorized service area. A map illustrating all areas in Minnesota relevant to the CenturyLink/Lumen RDOF winning bids is attached for illustrative purposes as **Exhibit A**.

Some of the RDOF Census Blocks won by CenturyLink/Lumen fall outside of the authorized service area for any CenturyLink affiliate with ETC status. These incremental RDOF Census Blocks ("Incremental CBs") are listed in **Exhibit B**. Because CLC presently is not a designated ETC in Minnesota in these areas, CLC files to obtain ETC designation for these Incremental CBs.⁹

⁷ On September 14, 2020, CenturyLink, Inc., the ultimate parent of CLC, announced the launch of its "Lumen" brand. Effective September 18, 2020, the stock of CenturyLink, Inc. began trading under the symbol "LUMN." On January 22, 2021, CenturyLink, Inc. formally changed its name to Lumen Technologies, Inc. As a result, the company is now referred to as "Lumen Technologies," or simply "Lumen."

⁸ See *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, Public Notice, 35 FCC Rcd 6077 (2020) ("Auction 904 Procedures Public Notice").

⁹ To the extent some of these incremental census blocks may fall both inside and outside the CenturyLink Affiliates' service area, this Petition addresses solely the portion outside of the CenturyLink Affiliates' service area. Similarly,

CLC is required to obtain ETC status in the Incremental CBs as part of its compliance with the FCC's Rural Digital Opportunity Fund ("RDOF") rules. The RDOF rules require each winning bidder to have or obtain ETC status in every covered census block prior to FCC authorization.¹⁰

I. INTRODUCTION AND SUMMARY.

A. Applicant.

CLC is a Delaware limited liability company with principal offices located at 100 CenturyLink Drive, Monroe, Louisiana 71203. CLC is an indirect, wholly owned subsidiary of CenturyLink/Lumen. CenturyLink/Lumen provides high-quality voice and data services to enterprise, government, wholesale, and carrier customers over its IP-based network through its wholly owned indirect subsidiaries, including CLC and the CenturyLink Affiliates.

The Commission originally granted CLC CLEC authority to provide local exchange service in 1999 in Docket No. P-5096/NA-99-939.

B. Rural Digital Opportunity Fund.

The FCC's RDOF program accelerates the deployment of high-speed fixed broadband service in America. Phase 1 of the RDOF program is being implemented with a focus on areas that are wholly unserved under the FCC's 25/3 Mbps standard for fixed broadband applicable to the RDOF Auction Phase 1 program. The FCC has authorized RDOF support to companies, like CenturyLink/Lumen, that commit to deploy and maintain voice and broadband service meeting

if any of these incremental census blocks nominally include areas inside the service area of an incumbent local exchange carrier subject to federal rate-of-return regulation, those areas were specifically excluded from the RDOF Auction and are not relevant here. *Rural Digital Opportunity Fund; Connect America Fund*, WC Docket Nos. 19-126, 10-90, Report and Order, FCC 20-5, 35 FCC Rcd 686 (2020) ¶ 12.

¹⁰ See *Auction 904 Procedures Public Notice*.

the FCC's requirements to a specified number of locations (homes and small businesses) within the Incremental CBs for the life of the program.

In Minnesota, CenturyLink/Lumen was the winner in the RDOF auction for areas with funding totaling approximately \$15.6 million spread over 10 years.¹¹ CenturyLink/Lumen assigned those winning bids to its affiliate Qwest Corporation, which has filed the required Long-Form Application at the FCC on behalf of itself and its affiliates.¹² If approved, RDOF funding will begin to be disbursed for these areas in January 2022.

Pursuant to Section 214(e)(2) of the Act, a "State commission shall on its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission."¹³

Section 214(e)(1) of the Act in pertinent part provides:

A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received –

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

¹¹ See, *Auction 904 Procedures Public Notice*, Attachment A: "Winning Bidders Summary" at page 6 of 30. The link for Attachment A is as follows: <https://docs.fcc.gov/public/attachments/DA-20-1422A2.pdf>.

¹² See generally, *FCC Form 683 Instructions*, OMB Control No. 3060-1256, "Divide Winning Bids" process.

¹³ 47 U.S.C. § 214(e)(2).

II. COMMUNICATIONS AND CORRESPONDENCE.

The legal name, address and telephone number of CLC is as follows:

CenturyLink Communications, LLC
100 CenturyLink Drive
Monroe, LA 71203
(651) 312-5364

Pleadings, orders, notices or other correspondence and communications regarding this Petition should be provided to:

Jason D. Topp
CenturyLink/Lumen
Assistant General Counsel
200 South 5th Street, Suite 2200
Minneapolis, MN 55402
(651) 312-5364
jason.topp@lumen.com

The name and title of the officer or representative of CLC authorizing this Petition is, Thomas R. Freeberg, whose signature appears at the end of this Petition as Exhibit C.

III. REQUEST FOR EXPEDITED CONSIDERATION.

Each of CenturyLink/Lumen's RDOF applicants must demonstrate to the FCC that it or an affiliate has been designated as an ETC in each of the census blocks where it was assigned winning bids in the RDOF auction. The FCC's deadline for such documentation is June 7, 2021, and CLC requests that the Commission designate it as an ETC in the Incremental Census Blocks identified in **Exhibit B** by no later than June 1, 2021.

IV. CLC MEETS THE REQUIREMENTS FOR ETC CERTIFICATION.

CLC's Petition for Designation as an ETC for the Incremental CBs is consistent with the public interest, convenience and necessity, and satisfies the requirements for receiving universal service support under state and federal law, for the following reasons:

A. CLC Possesses the Intent and Capability of Providing Service Upon Reasonable Customer Request Throughout The Incremental CBs.

1. CLC's Regulatory Authority.

The Commission originally granted CLC CLEC authority to provide local exchange service in 1999 in Docket No. P-5096/NA-99-939.

2. CLC Will Provide Service as a Common Carrier.

For the purposes of this designation, CLC is a common carrier, as defined under the Act,¹⁴ and plans to offer the services stipulated by RDOF in the Incremental CBs under Section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's or affiliate's facilities and services. As certified by the verification attached as **Exhibit C**, CLC also plans to advertise the availability of such services and the charges using media of general distribution.

3. CLC Will Offer the Services Supported by the Federal Universal Service Support Mechanisms.

Pursuant to Section 54.101 of the FCC's rules, eligible voice telephony services include voice grade access to the PSTN or its functional equivalent.¹⁵ For RDOF Phase I support recipients, the FCC also defines the supported service as qualifying voice service and conditions grant of funding on the offering of qualifying broadband service.

4. CLC Will Provide Service Using Its Own Facilities.

For RDOF purposes, CLC, itself or through facilities and services of another carrier/affiliate, will provide voice service on a stand-alone basis in the Incremental CBs consistent with the FCC's high-cost universal service support rules applicable to it. Once its

¹⁴ A "common carrier" is defined as "any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio[.]" 47 U.S.C. § 153(10).

¹⁵ 47 C.F.R. § 54.101(a).

RDOF-supported network has been deployed, CLC primarily will be provisioning voice telephony, where requested by a customer, using Voice-over-Internet Protocol (“VoIP”) technology.¹⁶ CLC’s telephony voice service will include access to emergency services (including 911 or E911 where available) in the areas listed in **Exhibit B**.

B. CLC Will Provide Service Throughout Its Designated Service Area.

CLC commits to provide the supported service throughout the Incremental CBs covered by this request for ETC status. Those Incremental CBs are set forth in **Exhibit B**. The services CLC offers meet the Basic Local Service requirements under Minn. Rule 7812.0600. CLC has the ability and the intention to provide the voice telephony services required by 47 C.F.R. § 54.101(a)¹⁷:

- Voice grade access to the public switched network or its functional equivalent;
- Minutes of use for local service provided at no additional charge to end users;
- Access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911;
- Toll limitation for qualifying low-income consumers.

The universal service offering will be made available throughout the Incremental CBs on January 1, 2022 and beyond. CLC tariffs address customer eligibility provisions and the availability of subsidies under the Lifeline program¹⁸ and the Minnesota Telephone Assistance Plan.¹⁹ CLC is committed to providing the supported services throughout the Incremental CBs to all customers who make a request for such services if service can be provided at reasonable cost

¹⁶ CLC and its affiliates respectfully reserve all rights, claims and defenses relating to non-jurisdictional technologies that may be used to provision services under the RDOF Auction. Any reference to or use of such technologies herein should not be construed as a waiver of any rights, claims, and defenses that may be asserted in the future.

¹⁷ *FCC Connect America Order* 11-161 rel. November 18, 2011 at ¶¶ 76-81 discusses the changes to 47 C.F.R. § 51.101 and the required voice service offerings.

¹⁸ CenturyLink Local Exchange Tariff Section 5.2.6.A.

¹⁹ CenturyLink Local Exchange Tariff Section 5.2.6.B.

by constructing network facilities. The local usage plans offered are comparable to those offered by the incumbent local exchange carriers. CLC's local calling scope will mirror those of the ILECs and any mandatory Extended Service Area calling as part of the basic local service offering.

C. CLC's Advertising Plan.

CLC and/or its affiliates will advertise the availability of its universal service offerings and charges for such offerings using media of general distribution as required by 47 U.S.C. § 214(e)(1)(B), through a combination of digital and traditional media, such as postings on its website and local advertising in the markets it will serve that publicizes the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for the service.

CLC affirms that it and/or its affiliates will advertise the availability of its service and charges using media of general distribution as required by 47 U.S.C. § 214(e)(1)(B). As explained above, CLC will advertise the availability of, and the charges for, the supported service offerings using media of general distribution. CLC, together with its affiliates, will also undertake outreach initiatives to increase consumer awareness of its Lifeline service offering, consistent with all applicable requirements.

CLC will offer Lifeline discounts to qualifying low-income consumers in the Incremental CBs consistent with the FCC's Lifeline rules.²⁰ CLC, through its affiliate CenturyTel of Minnesota, has substantial experience in providing Lifeline services and qualifying low-income consumers for Lifeline services.

²⁰ See, 47 C.F.R. §§ 54.101(c), 54.805-54.806.

D. CLC’s 10-Year Plan for Use of Universal Service Support.

CLC certifies that it will provide service to the locations for which it has been awarded RDOF support consistent with the deployment and buildout requirements associated with such support. CLC notes that the FCC has waived the requirements to: (1) submit a five-year plan per 47 C.F.R. § 54.202(a)(1)(ii); and (2) demonstrate that it will satisfy applicable consumer protection and service quality standards per 47 C.F.R. § 54.202(a)(3). The FCC waived these requirements because “the Commission adopted more specific measures to track deployment, including annual reporting of service to geocoded locations and certification of compliance with benchmark milestones” and “such obligations were no longer essential to the Commission’s ability to monitor ETC use of support for its intended purpose.” *FCC ETC Procedures Notice* at 4-5. To the extent necessary, CLC requests a waiver of state requirements based on these waived FCC requirements.

E. CLC’s Ability to Remain Functional in Emergency Situations.

Pursuant to 47 C.F.R. § 54.202(a)(2), CLC will have sufficient back-up power to remain functional without an external power source in emergency situations, will be able to reroute traffic around damaged facilities, and will be able to manage traffic spikes resulting from emergency situations. At the user level, CLC will offer a 24-hour battery back-up option for user equipment that will provide the ability to make phone calls in the event of a power outage. At the system level, CLC is building redundancy into the network.

CLC complies with the Commission’s Rules in Chapter 7810 establishing minimum standards on various operational matters, such as 7810.3900 (Emergency Operations); 7810.4900 (Adequacy of Service); and 7810.5300 (Dial Service Requirements).

F. CLC’s Satisfaction of Consumer Protection and Service Quality Standards.

CLC certifies that it will satisfy all applicable consumer protection and service quality standards, including those associated with the RDOF program. CLC agrees to abide by those rules, and other applicable rules and regulations of this Commission. CLC affirms its commitment to satisfy this Commission’s consumer protection and service quality standards if certified as an ETC.

CLC is subject to, and complies with, the Commission’s Rules pertaining to service quality and consumer protection. CLC’s tariff has specific provisions outlining the following terms addressing consumer protection issues:

- Deposit and guarantee requirements²¹
- Customer Billing²²
- Appropriate handling of customer complaints and billing disputes²³
- Disconnection and notice requirements²⁴

The specific provisions in CLC’s tariff, as well as the Commission’s service quality rules by which CLC is bound, will apply throughout the Incremental CBs and assure a high level of service quality and consumer protection.

IV. DESIGNATING CLC AS AN ETC IN THE PROPOSED SERVICE AREA WILL SERVE THE PUBLIC INTEREST.

A. Public Interest.

Designation of CLC as an ETC in the Incremental CBs is in the public interest since it affords qualifying customers a choice of service providers while retaining the Lifeline benefit.

Expedited designation of CLC as an ETC in the Incremental CBs in Minnesota will serve the public interest by ensuring that CLC is eligible to receive federal USF support, including the

²¹ CLC Local Exchange Tariff, Section 2.3.3.

²² CLC Local Exchange Tariff, Sections 2.3.1 and 2.3.2.

²³ CLC Local Exchange Tariff, Section 2.3.4.

²⁴ CLC Local Exchange Tariff, Section 2.2.10.

RDOF support it won through the auction, and expand broadband coverage in and throughout the service area in Minnesota. The FCC has determined that the voice and broadband services CLC will deploy through RDOF support will advance the goal of RDOF to “ensure continued and rapid deployment of broadband networks to unserved Americans.”²⁵ RDOF support will allow CLC to accelerate service for those who need it most and prioritize deployment to the underserved in the Incremental CBs.

B. Affordability.

The local exchange services offered to CLC’s customers for universal service offerings are within the range of the FCC 2021 Annual Urban Rate Survey rates.²⁶ CLC’s basic voice service offerings can be found in its Local Exchange Services²⁷ tariff. CLC will provide the benefit of Lifeline discounts to qualifying subscribers in the areas associated with RDOF funding in the Incremental Census Blocks.

C. Commitment to Service Quality.

As noted above, CLC as a certified CLEC in Minnesota is subject to, and complies with, the Commission’s Rules pertaining to service quality and consumer protection.

V. ETC CERTIFICATION.

CLC requests that the Commission certify its use of support effective as of the date of CLC’s ETC designation for the Incremental CBs.

²⁵ *Rural Digital Opportunity Fund; Connect America Fund*, WC Docket Nos. 19-126, 10-90, Report and Order, FCC 20-5, 35 FCC Rcd 686 (2020) at para. 5.

²⁶ WC Docket 10-9, Announcement from the Wireline Competition Bureau and Office of Economics and Analytics issued 11-30-20

²⁷ CLC Local Exchange Tariff, Section 6.

VI. CONCLUSION

CLC meets the requirements of both state and federal laws and regulations for designation as an Eligible Telecommunications Carrier in the requested Incremental CBs. Pursuant to 47 U.S.C. § 214(e), the Commission should designate CLC as an Eligible Telecommunications Carrier for the RDOF Service Area. In so doing, the Commission will ensure that consumers in the RDOF Service Area have an opportunity to secure better and more reliable service at a rate equal to or less than that which they are currently paying. The consumers in the Incremental CBs will benefit and the public interest will be served if CLC's Petition is approved.

WHEREFORE, for the reasons stated herein, CLC respectfully requests that the Commission designate CenturyLink Communications, LLC as an ETC in the Incremental Census Blocks identified in **Exhibit B** by no later than June 1, 2021 and order such other relief as may be appropriate.

Dated this 3rd day of March, 2021.

CENTURYLINK COMMUNICATIONS, LLC

/s/ Jason D. Topp
Jason D. Topp
200 South Fifth Street, Room 2200
Minneapolis, MN 55402
(651) 312-5364

**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: In the Matter of the Petition of CenturyLink Communications, LLC for
Designation as Eligible Telecommunications Carrier**

CERTIFICATE OF SERVICE

Mary Holy hereby certifies that on the 3rd day of March, 2021, 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/ Mary Holly
Mary Holly