

November 20, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

**RE: Joint Application for Approval of an Interconnection Agreement between  
Integra Telecom of Minnesota, Inc. and:  
CenturyTel of Minnesota, Inc. d/b/a CenturyLink, Docket No. P5643,551/IC-14-778,  
and  
Embarq Minnesota, Inc. dba CenturyLink, Docket No. P5643,430/IC-14-779**

Dear Dr. Haar:

On September 12, 2014, CenturyLink submitted copies of negotiated Interconnection Agreements (Agreements) between Integra Telecom of Minnesota, Inc. (Integra) and:  
CenturyTel of Minnesota, Inc. d/b/a CenturyLink (CenturyLink) in Docket No. 14-778;  
and  
Embarq Minnesota, Inc. d/b/a CenturyLink (CenturyLink) in Docket No. 14-779.

On September 22, 2014, the Minnesota Department of Commerce (Department) filed comments recommending that the Commission approve the Agreements either at a Commission hearing or by way of the standing order process ordered on August 25, 2000.

On October 24, 2014, the Department filed revised comments recommending that the Commission reject the Agreements unless the Parties to the Agreements agree to:

- 1) Retract the provision in Section 9.3 on page 28, 16.2.4 on pages 33 and 34, and 16.2.8 on page 34; and
- 2) Replace the retracted language with recommended provisions.

On November 19, 2014, CenturyLink filed 1) a letter stating that Integra and CenturyLink have agreed to amend the Agreements to include the terms recommended by the Department with one exception, and 2) amended Agreements that include the Department's recommended terms with one exception.

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The Department has reviewed the amended Agreements and recommends that the amended Agreements be approved. The amended Agreements have retracted the objectionable provisions in Sections 9.3, 16.2.4 and 16.2.8 and replaced the retracted language with the Department's recommended provisions with one exception.

The last sentence in Section 9.3, Choice of Law and Venue, was retained, and the Department and the Parties agree that the language in the last sentence is appropriate when jurisdiction is retained by the Commission, as is the situation created by the other changes in the amendment.

Sincerely,

/s/ BRUCE L. LINSCHIED  
Financial Analyst

/s/ BONNIE J. JOHNSON  
Telecommunications Analyst

BLL/BJJ/lt

## CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Letter**

**Docket No. P5643,551/IC-14-778 and P5643,430/IC-14-779**

Dated this 20<sup>th</sup> day of November 2014

**/s/Sharon Ferguson**

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_14-778_IC-14-778
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_14-778_IC-14-778
Douglas	Denney	douglas.denney@integratelcom.com	Integra Telecom	1201 Lloyd Blvd, Suite 500  Portland, OR 97232	Electronic Service	No	OFF_SL_14-778_IC-14-778
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-778_IC-14-778
Kim	Isaacs	kdisaacs@integratelecom.com	Integra Telecom, Inc.	6160 Golden Hills Dr.  Golden Valley, MN 55416	Electronic Service	No	OFF_SL_14-778_IC-14-778
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_14-778_IC-14-778
Jeffrey T.	Nodland	JEFF.NODLAND@CENTURYLINK.COM	CenturyLink	1801 California St FL 10  Denver, CO 80202	Electronic Service	No	OFF_SL_14-778_IC-14-778
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-778_IC-14-778

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Douglas	Denney	douglas.denney@integratelcom.com	Integra Telecom	1201 Lloyd Blvd, Suite 500  Portland, OR 97232	Electronic Service	No	OFF_SL_14-779_IC-14-779
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-779_IC-14-779
Kim	Isaacs	kdisaacs@integratelecom.com	Integra Telecom, Inc.	6160 Golden Hills Dr.  Golden Valley, MN 55416	Electronic Service	No	OFF_SL_14-779_IC-14-779
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