



STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

October 28, 2014

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445 MINNESOTA STREET
ST. PAUL, MN 55101-2131
TELEPHONE: (651) 296-7575

LORI SWANSON
ATTORNEY GENERAL

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

RE: In the Matter of the Joint Application for Approval of an Interim Interconnection Agreement for the State of Minnesota by and between CenturyTel of Minnesota, Inc. d/b/a CenturyLink and Integra Telecom of Minnesota, Inc.
Docket No. P5643, 551/IC-14-778

In the Matter of the Joint Application for Approval of an Interim Interconnection Agreement for the State of Minnesota by and between Embarq Minnesota, Inc. d/b/a CenturyLink and Integra Telecom of Minnesota, Inc.
Docket No. P5643, 430/IC-14-779

In the Matter of the Joint Application for Approval of an Interconnection Agreement for the State of Minnesota by and between CenturyTel of Minnesota, Inc. d/b/a CenturyLink and CenturyLink Communications, LLC
Docket No. P5096, 551/IC-14-794

Dear Dr. Haar:

The Office of the Attorney General – Antitrust and Utilities Division (“OAG”) has reviewed the comments filed by the Minnesota Department of Commerce on October 24, 2014, in each of the above-referenced dockets. In each docket, the Department addressed concerns regarding the choice of law and dispute resolution sections of the negotiated agreements. Among other concerns, the Department noted that exclusive jurisdiction in a distant forum would hinder the ability of the OAG and the Department to intervene or participate in matters affecting the public interest.¹ The Department also raised concerns about the potential surrender of primary jurisdiction by the Commission.

¹ In addition to these more general concerns, in Docket No. P551, P5096/IC-14-794, the choice of law section of the agreement appears to contain a typographical error that misidentifies the proposed forum.

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The OAG generally agrees with the Department's analysis on these matters and joins in the Department's recommendation that the agreements in each docket, as currently written, be rejected.

Sincerely,

/s/ James W. Canaday
James W. Canaday
Assistant Attorney General
Manager, Antitrust and Utilities Division

(651) 757-1421 (Voice)
(651) 296-9663 (Fax)

AFFIDAVIT OF SERVICE

RE: In the Matter of the Joint Application for Approval of an Interim Interconnection Agreement for the State of Minnesota by and between CenturyTel of Minnesota, Inc. d/b/a CenturyLink and Integra Telecom of Minnesota, Inc.
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In the Matter of the Joint Application for Approval of an Interconnection Agreement for the State of Minnesota by and between CenturyTel of Minnesota, Inc. d/b/a CenturyLink and CenturyLink Communications, LLC.
Docket No. P5096, 551/IC-14-794

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, Deanna Donnelly, hereby state that on the 28th day of October, 2014, I efiled with eDockets **Letter** regarding the above-referenced matters and served the same upon all parties listed on the attached service lists via electronic submission.

See Attached Service Lists

s/ Deanna Donnelly
Deanna Donnelly

Subscribed and sworn to before me
this 28th day of October, 2014.

s/ Patricia Jotblad
Notary Public
My Commission expires: January 31, 2015.

| 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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| 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_14-779_IC-14-779 |
| 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_14-779_IC-14-779 |
| 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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| Jeffrey T. | Nodland | JEFF.NODLAND@CENTURYLINK.COM | CenturyLink | 1801 California St FL 10 Denver, CO 80202 | Electronic Service | No | OFF_SL_14-779_IC-14-779 |
| Jason | Topp | jason.topp@centurylink.com | CenturyLink | 200 S 5th St Ste 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-779_IC-14-779 |

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| 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 | No | OFF_SL_14-794_IC-14-794 |
| 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_14-794_IC-14-794 |
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 551012147 | Electronic Service | No | OFF_SL_14-794_IC-14-794 |
| ICA | Interconnection Agreements | intagree@centurylink.com | CenturyLink Communications, LLC | 4650 Lakehurst Court 3rd Floor Dublin, OH 43016 | Electronic Service | No | OFF_SL_14-794_IC-14-794 |
| 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 | No | OFF_SL_14-794_IC-14-794 |
| Jeffrey T. | Nodland | JEFF.NODLAND@CENTURYLINK.COM | CenturyLink | 1801 California St FL 10 Denver, CO 80202 | Electronic Service | No | OFF_SL_14-794_IC-14-794 |
| Jason | Topp | jason.topp@centurylink.com | CenturyLink | 200 S 5th St Ste 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-794_IC-14-794 |