



STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

October 28, 2014

SUITE 1400
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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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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

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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
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