



Jason D. Topp
Senior Corporate Counsel - Regulatory
(651) 312-5364

June 12, 2014

Dr. 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 CenturyLink, Inc. Petition for Waiver of
Minnesota Rule Part 7810.5800
Docket No. P-421/AM-14-255**

Dear Dr. Haar:

Enclosed for filing are the Supplemental Comments of CenturyLink regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

**Re: In the Matter of the CenturyLink, Inc. Petition for Waiver of
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Docket No. P-421/AM-14-255**

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Dianne Barthel hereby certifies that on the 12th day of June, 2014, she e-filed a true and correct copy of the Supplemental Comments of CenturyLink by posting it on www.edockets.state.mn.us. Said document was also served on the service list via U.S. mail and e-mail as designated with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel
Dianne Barthel

Subscribed and sworn to before me
this 12th day of June, 2014.

/s/ LeAnn M. Cammarata
Notary Public

My Commission Expires Jan 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_14-255_Official
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_14-255_Official
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_14-255_Official
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_14-255_Official
JoAnn	Hanson	joann.hanson@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-255_Official
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_14-255_Official
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**In the Matter of the Petition of
CenturyLink, Inc., on behalf of its
Affiliated Companies, for Waiver of
Minnesota Rule Part 7810.5800**

Docket No. P-421/AM-14-255

SUPPLEMENTAL COMMENTS OF CENTURYLINK

CenturyLink, Inc., on behalf of its affiliated companies (“CenturyLink”), files these supplemental comments pursuant to the Commission’s Notice of Supplemental Comment Period issued May 23, 2014 (“Supplemental Notice”). CenturyLink files these comments to clarify that it seeks a variance completely waiving the rule, but has proposed as a reasonable temporary alternative, that the Commission consider imposing an 85% standard until the current rulemaking proceeding¹ is completed.

The Supplemental Notice states:

On May 21, 2014, CenturyLink filed comments modifying its initial request. CenturyLink now asks the Commission to grant a variance reducing the 95% standard in Part 7810.5800 to an 85% standard during the period that the Commission addresses all service quality rules in a rulemaking proceeding.²

In its Reply Comments, CenturyLink suggested that, in the event the Commission is uncomfortable with a complete waiver, the Commission could consider imposing an 85% standard as a temporary measure while the rulemaking takes place. CenturyLink requested

¹ *In the Matter of the CenturyLink, Inc. Petition for Rulemaking to Revise Service Quality Rules*, Docket No. P-421/AM-14-256.

² Supplemental Notice, p. 1.

that the Commission “grant[] its request for a waiver or . . . exercise[e]. . . its authority to instead grant a variance changing the standard on a temporary basis to 85%.”³

To the extent there might be any confusion on the issue, CenturyLink still believes that a complete waiver of the rule best serves Minnesota customers in light of the communications options available in today’s marketplace, the burdens the current standard imposes on carriers, the very small number of customers impacted by the standard and the fact that competitors are not actively held to the 95% standard that imposed by Minn. R. 7810.5800.

Dated this 12th day of June, 2014.

CENTURYLINK, INC.

/s/ Jason D. Topp

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³ Reply Comments, p. 8.