

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

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

In re Century Link, Inc. Petition for
Rulemaking to Revise Service Quality Rules

MPUC Docket No.: P-421/AM-14-256

REPLY COMMENTS OF MINNESOTA CABLE COMMUNICATIONS ASSOCIATION

Comes now the Minnesota Cable Communications Association (the “MCCA”) and, pursuant to the Minnesota Public Utilities Commission’s (the “Commission’s”) Notice of Comment Period – Century Link Petition for Rulemaking to Revise Service Quality Rules, submits these Reply Comments in the above-captioned proceeding. The MCCA represents Minnesota’s cable communications companies who provide video, voice and high-speed data services to approximately 900,000 Minnesota residents pursuant to franchises issued in over 600 communities throughout Minnesota. For over thirty (30) years, the MCCA has played a leading role in advocating the rights of its members, including, since the opening of Minnesota’s local exchange market to competition, representing the interests of members’ telephone operating subsidiaries before the Commission on public policy matters affecting telecommunications in Minnesota.

Like the initial comments of the Joint CLECs, MCCA takes no position on whether the Commission should open a rulemaking regarding retail service quality rules.¹ However, MCCA supports the position of the Joint CLECs that if the Commission does open a rulemaking, that

¹ Comments of Joint CLECs, p. 3.

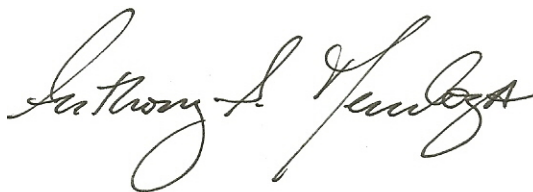
rulemaking proceeding should be limited strictly to retail service quality. Any changes to wholesale service quality rules must be made through Century Link's CPAP and/or through a competitive carrier's interconnection agreement with an incumbent local telephone company (ILEC). Moreover, the Commission should refrain from changing any retail service quality rules used as a comparison for wholesale service quality measures in Century Link's Minnesota CPAP unless Century Link and competitive carriers are able to negotiate suitable protections with respect to the particular wholesale service quality affected by the proposed change in a retail rule.

Moreover, MCCA agrees with the Joint CLECs that Century Link's petition does not comply with Minn. R. 1400.2040(B) which requires a petition for rulemaking to request the specific action it wishes the rulemaking authority to take. MCCA believes Century Link's petition should identify which rules it seeks to change and how.

MCCA takes no position on any of the other questions posed in the Commission's April 2, 2014 Notice of Comment Period.

Dated: April 25, 2014

MINNESOTA CABLE COMMUNICATIONS
ASSOCIATION

A handwritten signature in black ink, appearing to read "Anthony S. Mendoza". The signature is fluid and cursive, with the first name "Anthony" being the most prominent part.

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