

DECLARATION OF LISA MARKEGARD

Lisa Markegard declares, under penalty of perjury, as follows:

1. I am the president of the Communications Workers of America, District 7, Local 7200 (Minneapolis), and have served in that capacity since November of 2018. I have also been employed by Lumen or its predecessor as a Network Technician since November 22, 2022. In this Declaration, I will refer to both Lumen and CenturyLink as “Lumen.” I am submitting this declaration in connection with the CWA’s comments in response to Lumen’s compliance filing in *In the Matter of a Formal Complaint regarding the services provided by the Qwest Corporation, d/b/a CenturyLink in Minnesota, on behalf of the Communications Workers of America (CWA)*, Docket No. P-421/C-20-432, and also in connection with the CWA’s opposition to the Application in *In the Matter of the Joint Application of Forged Fiber 37, LLC, Qwest Corporation dba CenturyLink QC, CenturyLink of Minnesota, Inc. and CenturyLink Communications, LLC Regarding Transfer of Control of Lumen’s Minnesota Mass Markets Fiber Business*, Docket No. P421,430, 5096/PA-25-279. I have firsthand knowledge of the facts set forth in my declaration and could, if called as a witness, competently testify to those facts.

2. I have been one of CWA’s representatives at meetings with Lumen management convened in connection with the Plant Pride Program.

3. At the first Plant Pride meeting, last December, the CWA and Lumen agreed that the Company would draft an agreement to serve as the framework for the program, similar to what was done in New York and Pennsylvania. This document was to provide the structure upon which the Company and the Union could add and align our prospective

goals. Although it has now been eight months since the Company made that commitment and no agreement has been forthcoming. In response to our repeated requests, we have been repeatedly told that the Company's lawyers are working on it. Not only does the lack of an agreement limit the effectiveness of the program, it gives the impression that the Company is not taking Plant Pride seriously.

4. A critical function of the Plant Pride program was to enable field technicians to be in the loop regarding maintenance and repair decision-making. The way that Lumen has chosen to satisfy this requirement is through what is referred to as the Plant Maintenance Request tool. This tool was intended to allow technicians to report maintenance issues and submit photographs documenting those issues and also receive reports regarding the status of issues that they report.

5. Unfortunately, in practice, the information that the tool provides is very limited. First, the tool does not directly report to the tech how any issue the tech reported was resolved. The report does allow the tech to search a database by ticket numbers, but techs typically do not have the luxury of time to do this research. Further, although the tool will allow the tech who has time to do this research to find out that an issue was resolved, it does not tell the tech how the issue was resolved.

6. Moreover, the PMR tool does not work properly. In fact, there are two problems with the tool. First the tool requires a photograph to report a problem but there are instances where it either is not possible to photograph a problem, such as a problem with underground wire or a photograph would not show that there was a trouble on the line, such as whether a wire is working. Second, at an August 14, 2025, meeting, John Ardoyno,

Lumen's Director of Network Operations, acknowledge that the PMR tool does not allow techs to submit photographs and it does not report back to the techs regarding the status of maintenance issues that have been reported. Mr. Ardoyno states that this is an issue with the software vendor. CenturyLink has not said when, if ever, the problem will be fixed.

7. The Company has not done an effective job making sure that technicians are aware of the tool and how to use it. The Company has not emphasized training on the tool and has not informed technicians of where and when meetings are held to provide information on the tool. On August 22, 2025, I attended a crew meeting at the Brooklyn Center garage. When one of the technicians had a question about PUC tickets, I asked whether the PMR tool indicated whether a ticket originated with the PUC. A tech asked what the PMR tool was. I explained the tool and asked if any of the fourteen techs had used the tool and only one had. When I asked who knew what the PMR tool was, that was the only tech who raised his hand.

8. Lumen has also made it more difficult for technicians to track whether an out of service condition has been cleared within 24 hours, which is the objective established in the Commission's rules. As a matter of long-standing practice, repair tickets included the time when the ticket was created, which made it easy for the technician (and others with access to the ticket) to determine the length of time the trouble had been outstanding. Lumen recently removed this information from the repair tickets, purportedly because the time information was not accurate. Lumen has not provided any support for this claim, however.

9. Lumen has resisted sharing information with CWA. The Company created a spreadsheet containing repair statistics and displays that information on a computer screen during the Plant Pride meetings. When CWA has asked to receive a copy at the June 26 meeting, so that we can analyze it and perhaps make suggestions, Lumen has said that CWA needs to make a “formal request.” Once we made a formal request, we were then provided with the specific information we had discussed but not the entire spreadsheet. We have since asked for the actual spreadsheet but as of the date of this Declaration, we have not received it.

10. A technician who goes out on a repair ticket must determine if the trouble can be quickly diagnosed and repaired or if the problem will take a longer time to repair, in which case the technician will “kick it to cable.” Such a repair is considered a “cable fail” and is then reassigned to technicians on the cable maintenance crew. This means that the customer will be out of service longer and the repair will not meet the 24-hour clock. Many skilled technicians will be able to do the repair but doing so will take more time (although less time than if the repair is kicked to cable), which may prevent them from meeting the quotas set by the Company, which can lead to discipline and/or loss of employment, so technicians that can do the repair don’t do the longer repairs so they can meet the objectives. A CenturyLink manager, Tracy Davies, told me in a phone call on August 18, Lumen had 456 cable fails. Lumen lacks enough technicians to eliminate this backlog in a reasonable amount of time.

11. Lumen, in the first Plant Pride meeting on December 3, 2024, told CWA of its plans to hire 10-12 additional technicians. Lumen ultimately put in requisitions for eight

Network Technicians. Lumen did not hire new employees to fill these positions; rather they were filled by moving current employees between crews or, in one case, moving an Enhanced Premises Tech to a Network Technician position. When we asked Mr. Ardoyno why the Company did not hire the additional Technicians, he stated that the additional hiring was too costly and the Company would just need to lay off the new employees in the near future.

12. In its order in the 20-432 docket, the Commission ordered Lumen to repair obviously dilapidated plant and Lumen reports that it has done so. However, CWA has learned that these repairs were completed by contractors, not the Company's union employees, and were intended to be solely cosmetic in nature. The Company does not know which of these conditions were potentially service-affecting and, accordingly, the contractors made no effort to repair such issues. That a broken pedestal housing has been replaced does not mean that the issue has been appropriately resolved.

13. If Lumen is able to sell its metro area fiber network to AT&T, this is likely to make Lumen's service quality problems worse. At a Joint Union Management meeting on August 14, Mr. Ardoyno said that we should encourage our members to take employment offers from AT&T/Network Co. because CenturyLink will not receive enough revenue from its POTS customers to support keeping all of the techs that it currently employs, much less hire new ones.

14. In many circumstances, Lumen would rather be rid of a customer than incur repair costs. Thus, if a customer experiences chronic troubles or if there are only a few customers served by a multi-line cable run and any of those customers experiences

chronic troubles, it is Lumen's strategy to pressure those customers to drop their POTS service so that Lumen can avoid repair costs.

15. A technician in Duluth and one in southern Minnesota have reported that they are being told that complaints received from the PUC are taking priority over meeting the 24-hour objective for out-of-service tickets. When the Duluth tech expressed concern about giving PUC complaints priority over out-of-service tickets, the manager told him that the Company would be in trouble if the PUC complaints were not resolved and the company did not have enough technicians.

I declare under penalty of perjury that everything I have stated in this document is true and correct to the best of my knowledge.

Dated September 8, 2025

s/Lisa Markegard
Lisa Markegard