

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

Katie Sieben
Hwikwon Ham
Audrey Partridge
Joseph K. Sullivan
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

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

MPUC Docket No. P421,430, 5096/PA-25-279

INITIAL COMMENTS OF THE COMMUNICATION WORKERS OF AMERICA -DISTRICT 7

The Communication Workers of America – District 7 (“CWA”) respectfully submits these initial comments in response to the Commission’s July 22, 2025, Revised Notice of Comment Period in the above-captioned docket.¹ Shortly before the filing of these comments, CWA received a settlement proposal from AT&T. We have not had time to fully review the proposal or its implications, but, on an initial review, we believe it likely resolves the issues that we had with AT&T regarding the merger. We are in ongoing discussions with AT&T about this and intend to comment more fully on AT&T's proposal when we file our reply comments. The proposal does not address any of the customer service issues that relate to Lumen.

¹ CWA had the assistance of legal counsel in preparing these comments.

In this case, Lumen seeks to transfer its Twin Cities metro area fiber network and related “capabilities” to a newly-created subsidiary of AT&T (referred to here as “AT&T NetworkCo.”).

The Transaction falls squarely within the scope of the Commission’s jurisdiction. Thus, to complete the Transaction, Applicants must first obtain the Commission’s approval. To obtain the Commission’s approval, Applicants must establish that the Transaction is in the public interest, considering whether service will be preserved and whether the Transaction will provide possible benefits to Minnesota consumers.

The Joint Application, long on generalities but skimpy on details regarding issues that are relevant to this public interest analysis, fails to show how Lumen will, after the Transaction has been completed, maintain its aging and deteriorating copper network in Greater Minnesota in a manner that meets the Company’s service quality obligations. Further, although the Applicants tout the many benefits that they claim will be available to consumers in the Twin Cities metro area, the Transaction offers less than nothing for those who live in Greater Minnesota. Rather, the most likely outcome, if the Transaction is allowed to proceed, is that consumers in Greater Minnesota will continue to find themselves on the wrong side of the digital divide and continue to experience inadequate telephone service. In short, the Applicants, on the face of the Application, have failed to carry their burden of establishing that the Transaction is in the public interest and, therefore, the Commission should deny the Application. In the alternative, the CWA recommends that the Commission order a contested case proceeding, to answer

questions of fact that are material to determining whether the Transaction is in the public interest and to assure that the issues are resolved on a fully-developed record.

ARGUMENT

A. Background Regarding CWA – District 7

The Communications Workers of America is a labor union that represents nearly 400,000 workers in North America, including 144,000 workers in the Information Communications Technology sector. Communications Workers of America – District 7 represents Lumen employees in 14 legacy US WEST/ Qwest states, including Minnesota. In Minnesota, Communications Workers of America – District 7 represents 545 Lumen employees. CWA is participating in this matter to protect the interests of its members from harm that is likely to result if the Transaction is approved and because the Transaction will impede Lumen’s ability to maintain its network in a manner that meets the Commission’s service quality requirements.

It was a complaint that the CWA filed with the Commission in 2020 that caused the Commission to initiate an investigation of Lumen’s service quality. That investigation resulted in the Commission’s order, following a lengthy contested case proceeding, finding Lumen to be in violation of the Commission’s service quality rules and requiring Lumen to take remedial action.² The Commission issued that order in September 2024.³

² *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*, MPUC Docket No. P-421/C-20-412 (the “20-432 Docket”).

³ 20-412 Docket, ORDER FINDING BREACH OF SERVICE QUALITY RULES AND ESTABLISHING REMEDIES (Sept. 17, 2024) (ORDER). Lumen filed a compliance report in the 20-412 Docket on May 23. CWA has recently filed comments that set forth CWA’s concerns regarding Lumen’s failure to comply with the Commission’s order.

B. Applicants Must Obtain the Commission’s Approval Before It Completes the Transaction

Minnesota law prohibits a telephone company or other entity subject to the Commission’s jurisdiction from acquiring assets of any telephone company doing business in the state without first obtaining the Commission’s approval.⁴ Two of the Lumen subsidiaries that are on the seller’s side of the proposed Transaction, CenturyLink QC and CenturyLink MN, are telephone companies.⁵ As the ultimate acquiring party, AT&T NetworkCo. will obtain a certificate of authority from the Commission to provide local niche service and will, thus, be subject to the Commission’s jurisdiction. Thus, the proposed Transaction meets the conditions of the statute, triggering the Commission’s jurisdiction to approve the Transaction.

Although arguing that Commission approval of the Transaction is not necessary, the Applicants do not address the plain language of the statute. Instead, they contend that “[t]he Commission has a long history of concluding that transactions that do not result in a change in control of a regulated service provider in Minnesota, or any other changes to an entity providing regulated service, do not require formal approval.”⁶ Applicants are wrong.

The cases that the Applicants rely on to show a supposed “long history” of not requiring approval of sales transactions are nothing like this case. First, the very title of the Commission’s docket, cited by the Applicants as evidence of this supposed long history, concerns criteria for reviewing transfers of control procedures for non-dominant carriers.

⁴ Minn. Stat. §237.23 (2024).

⁵ See Joint Application at 5, fn. 12.

⁶ Joint Application at 3.

In most of the areas served by CenturyLink it is ILEC – the dominant carrier and the carrier of last resort. The order does not relate to transfers by the dominant carrier of infrastructure that it is using in a huge geographic area, as is at issue in this case.

Second, the order provides that approval is not required for *pro forma* changes, such as corporate restructuring or internal transfers.⁷ The plain language of the order makes clear that the exemption from the approval requirement does not apply when there is “a change of the ultimate ownership or control of the carrier *or its assets*.”⁸ Here, Lumen seeks to transfer ownership of its assets, including assets that it is now using and will continue to use to provide regulated voice service. These include POTS service provided to customers over the fiber facilities that are part of the transaction,⁹ as well as “substantial fiber construction capabilities.”¹⁰

Finally, the Commission has authority to investigate “[w]henver the commission believes that a service is inadequate or cannot be obtained or that an investigation of any matter relating to any telephone service should for any reason be made.”¹¹ If, as a result of that investigation, the Commission determines “that any service is inadequate, the commission shall make an order respecting the tariff, regulation, act, omission, practice, or service that is just and reasonable.”¹² As will be discussed in greater detail below, it is

⁷ Joint Application at 3.

⁸ *In the Matter of a Commission Investigation into Possible Modification of its Procedure for Reviewing Non-Dominant Carrier Acquisitions and Transfer of Control*, MPUC Docket No. P-999/CI-07-192, ORDER DECLINING TO ADOPT PROPOSED REVIEW MODIFICATIONS AND APPROVING APPLICATION CONTENT CHECKLIST, Ex. A (May 22, 2007).

⁹ Joint Application at 7-8.

¹⁰ Joint Application at 7.

¹¹ Minn. Stat. §237.081, subd. 1 (2024).

¹² Minn. Stat. §237.081, subd. 4 (2024).

not the case that the Transaction will have no effect on Lumen’s regulated operations. To the contrary, it is likely that the Transaction will significantly compromise Lumen’s ability to provide preventative maintenance of its remaining network in a manner that complies with the Commission’s service quality order. The Commission has jurisdiction to take action to prevent such harm.

C. The Applicants Have Not Shown that the Transaction is in The Public Interest

1. Approval of the Transaction Requires Applicants to Show that It is in The Public Interest

In order to obtain Commission approval of the Transaction, the Applicants must show that it is in the public interest.¹³ Although the Applicants do not agree that Commission approval is necessary here, they do not dispute that, if approval is required, this is the standard the Commission should use.¹⁴ “In making these determinations, the Commission considers whether the transaction is in the public interest—that is, whether service will be preserved and whether a transaction will provide possible benefits to Minnesota consumers.”¹⁵

2. The Transaction Will Not Benefit Customers in Greater Minnesota

¹³ *In the Matter of the Application to Transfer Control of YMax Communications Corp. to B. Riley Financial, Inc.*, MPUC Docket No. P6555/PA-17-871, ORDER (Jan. 24, 2018) (approving transaction as in the public interest).

¹⁴ Joint Application at 9.

¹⁵ See, e.g., *In the Matter of the Joint Application of Frontier Communications Corporation, Frontier Subsidiary Telco, LLC, Citizens Newtel, LLC, Frontier Communications of Minnesota, Inc., Citizens Telecommunications Company of Minnesota, LLC, and Frontier Communications of America, Inc. for Approval of a Transfer of Control due to a Chapter 11 Plan of Reorganization of Frontier Communications Corporation and its Subsidiaries*, Docket No. P-405, P-407, P-5361/PA-20-504, ORDER APPROVING TRANSFER OF CONTROL OF MINNESOTA TELECOMMUNICATIONS SUBSIDIARIES at 3. (Dec. 7, 2020); *In the Matter of the Application for Charter Communications, Inc. to Engage in a Reorganization*, Docket No. P-5535, 5615/PA-09-560, Order at 6–8 (July 13, 2009); *In the Matter of the Request for Approval of a Transfer of Control of McLeodUSA Telecommunications Services, Inc. and McLeodUSA Telecom Development, Inc.*, Docket No. P-5634, 5323/PA-02-201, Order at 4–5 (March 22, 2002).

The discussion in the Application of the public interest issues relevant to the Transaction is so vague and general as to be meaningless. Thus, the Applicants assert “The Transaction will expand investment in critical connectivity infrastructure, create new jobs, accelerate the deployment of high-fiber internet access, and deliver additional benefits by enabling more consumers and small businesses to leverage this high-speed connectivity, all consistent with the Commission’s promotion of economically efficient broadband infrastructure.”¹⁶ In an attempt to flesh this claim out, CWA asked the Applicants for information about whether the claimed benefits would be available outside of the Twin Cities metro area and the response to this question was even murkier. The Applicants’ response clarified that the referenced investment would not necessarily come from the Applicants, nor could the Applicants say where this investment might occur.¹⁷ In other words, the “investment” that the Applicants claim to make their public interest showing is speculative, at best. The Applicants complete failure to provide any specific details speaks volumes.

Further, other evidence shows that the Transaction will not, in fact, provide any benefit to Greater Minnesota. Lumen states that its plans with respect to legacy service and potential copper retirement “are outside the scope of this matter.”¹⁸ Indeed, Lumen does not intend to invest in upgrading to fiber any of its network in Greater Minnesota. Rather, Lumen intends use the sale proceeds to pay down debt, invest in artificial

¹⁶ Joint Application at 9.

¹⁷ Responses to CWA Questions (PUBLIC), Question No. 7. The parties’ responses to the CWA’s questions accompany these comments as Attachment A.

¹⁸ Responses to CWA Questions (PUBLIC), Question No. 14.

intelligence, and expand its intercity fiber network.¹⁹ This is true even though Lumen's recent compliance filing shows that the Company is not performing the proactive maintenance envisioned by the Commission's order in the 20-432 Docket and is not otherwise in compliance with the Commission's order.²⁰

Although the Applicants tout the Transaction as "consistent with the Commission's promotion of economically efficient broadband infrastructure,"²¹ this statement gives short shrift to the Commission's responsibilities, which go far beyond simply promoting the development of broadband. Rather, the legislature has identified the following specific telecommunications goals that the Commission should consider as it executes its regulatory responsibilities:

- (1) supporting universal service;
- (2) maintaining just and reasonable rates;
- (3) encouraging economically efficient deployment of infrastructure for higher speed telecommunication services and greater capacity for voice, video, and data transmission;
- (4) encouraging fair and reasonable competition for local exchange telephone service in a competitively neutral regulatory manner;
- (5) maintaining or improving quality of service;
- (6) promoting customer choice;
- (7) ensuring consumer protections are maintained in the transition to a competitive market for local telecommunications service; and

¹⁹ Application at 16.

²⁰ See 20-432 Docket, CenturyLink Compliance Report; 20-432 Docket, CWA Letter Comments, Sept. 9, 2025. In response to the CWA's requests for information in this docket, Lumen refused to provide information regarding its compliance with the Commission's 20-432 order, taking the position that such compliance is "outside the scope of this matter." Responses to CWA Questions (PUBLIC), Question No. 9.

²¹ Application at 9, citing Minn. Stat. 237.011.

(8) encouraging voluntary resolution of issues between and among competing providers and discouraging litigation

Applicants have very little to say about how the Transaction will promote these goals.

It is not the case, as Applicants seem to believe, that the only relevant public interest consideration in this case is the extent to which the Transaction will advance the development of broadband. In the 20-432 case, the Commission adopted that ALJ's finding that, "The broad public interest is to ensure that all Minnesotans have reliable means of telecommunication, and the record establishes that landline service continues to be a necessary service for all Minnesotans."²²

Further, the broadband development that the Applicants assert the Transaction will encourage is limited to broadband development in the Twin Cities metro area; it will not extend to greater Minnesota. When asked how the Transaction would promote residential broadband competition outside the Twin Cities metro area, the Applicants responded that "any impact outside the Twin Cities metro area cannot be delineated at this time."²³ Lumen stated that its plans to deploy additional fiber were "outside the scope of this matter."²⁴ In short, according to the Applicants, the Transaction will promote broadband in the Twin Cities, where customers already have options but leave customers in Greater Minnesota, where options are generally few to none, on the wrong side of the digital divide.

3. The Transaction is Likely to Reduce Resources Available for Lumen to Maintain Its Network in a Manner that Provides Adequate Service

²² Findings at ¶60; Order at ¶¶16-17.

²³ Responses to CWA Questions (PUBLIC), Question No.3.

²⁴ Responses to CWA Questions (PUBLIC), Question No. 15.

The evidence in the 20-432 case showed that the service quality failures that were the subject of that case were largely because the Company did not have sufficient numbers of technicians to enable effective preventative maintenance. The Transaction is likely to exacerbate this problem, to the disadvantage of customers in Greater Minnesota.

Lumen's Twin Cities fiber network provides the Company with resources that it is able to use to help maintain its copper network and extend its fiber network in Greater Minnesota. The sale of that network means that those resources will no longer be available and maintenance will suffer. At the first Plant Pride meeting, in December 2024, Lumen told CWA that it planned to hire 10-12 additional technicians. Lumen ultimately put in requisitions for eight Network Technicians. However, rather than hire new employees to fill these positions, they were filled by moving current employees between crews. When the CWA asked why Lumen had not hired the additional technicians it had promised, John Ardoyno, Lumen's Director of Network Operations, responded that additional hiring was too costly and that the Company would have to lay off the employees in the near future.²⁵ Mr. Ardoyno has also told CWA that revenue from POTS customers who remain after the sale of Lumen's metro fiber network will not be enough to continue employing technicians who are currently Lumen employees, much less hiring additional technicians.²⁶

At the same time that it is attempting to sell its metro fiber network, Lumen, rather than engaging in the kind of preventative maintenance that the Commission's order in the 20-432 requires, is actively seeking to get rid of customers whose service requires repairs.

²⁵ Declaration of Lisa Markegard (Markegard Decl.) at ¶11.

²⁶ Markegard Decl. at ¶13.

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, Lumen's strategy is to pressure those customers to drop their POTS service so that Lumen can avoid repair costs.²⁷

D. Significant Questions Preclude the Commission from Approving the Transaction

For the reasons discussed above, the Application fails to provide facts sufficient for the Commission to conclude that the Transaction is in the public interest and, for that reason, the Commission should deny approval.

However, if the Commission finds that the Application raises significant questions of fact that it is not able to resolve on the record before it, the appropriate procedure is to refer the matter to the Office of Administrative Hearings for a contested case proceeding.

Based upon its analysis of the Application and other pertinent facts, the CWA believes that questions of fact that may require further investigation included the following:

1. Is Lumen in compliance with the Commission's 20-432 Order?
2. What effect will the Transaction have on Lumen's ability to comply with the Commission's 20-432 Order and otherwise maintain its network in a manner that provides customers with adequate service?
3. How will the relationship between Lumen and AT&T that enables Lumen to provide voice service over facilities being transferred to AT&T in the Transaction work? Why is the contract governing that relationship limited to three years? What are the potential outcomes at the end of three years?
4. What effect is the Transaction likely to have on Lumen employees who are represented by CWA?

²⁷ Markegard Decl. at ¶14; see also complaint received from Ms. Scoggins, which accompanies these comments.

5. How will the transfer of “construction capabilities” that are being transferred as part of the Transaction affect the public interest?
6. What are Lumen’s plans for copper retirement in Greater Minnesota?
7. What are Lumen’s plans to expand its fiber network in Greater Minnesota?
8. How will the Transaction benefit the public interest, specifically including the public interest of customers living in Greater Minnesota?
9. How will the Transaction harm the public interest, specifically including the public interest of customers living in Greater Minnesota?

CONCLUSION

The CWA recommends that the Commission find that the Commission has jurisdiction to review the Application to determine whether the proposed Transaction is in the public interest. CWA further recommends that the Commission determine that the Transaction is not in the public interest and, therefore, deny the Application or, in the alternative, refer this matter to the Office of Administrative Hearings for a contested case to determine all significant issues of fact raised by the Application.

Dated: September 16, 2025

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Attachment A

Responses to CWA Questions

1. In the Petition, at page 4, it states that “AT&T NetworkCo will be the owner of the assets subject to the transaction and intends to file a separate application for a new certificate of authority to provide local niche services.” Please describe all services to be offered pursuant to this certificate of authority.

Response from AT&T: As discussed in Forged Fiber 37, LLC’s Application for Authority to Provide Telephone Service in the State of Minnesota, filed July 25, 2025 in Docket No. P7164/NA-25-296, Forged Fiber 37, LLC is requesting authority to provide local niche service. Specifically, Forged Fiber 37, LLC proposes to provide high-capacity point-to-point private line services over a 100% fiber optic, facilities-based network utilizing its own facilities. Forged Fiber 37, LLC’s services will be offered to wholesale customers, including carriers and enterprise customers, on an individual case basis arrangement.

Response from Lumen: See AT&T’s response.

2. In the Petition, at page 2, it states that “AT&T NetworkCo will acquire only certain assets used in Lumen’s Mass Markets fiber business in Minnesota, which primarily provides broadband internet access services to retail customers.” Please describe and provide the product name for all services provided using the assets to be acquired in the Transaction that are not used by Lumen to provide any service other than broadband internet access services to retail customers.

Response from AT&T: See Lumen’s response.

Response from Lumen: Based on communications with CWA’s counsel, Lumen understands this question as asking whether the fiber assets being transferred are used by Lumen for anything other than broadband access or POTs over PON service. In addition to POTs over PON service, these assets are used to provide VOIP services. See response to Question 4.

3. In the Petition, at page 2, it states that “improved services will promote residential broadband service competition in Minnesota.” Explain how the alleged improved services will promote residential broadband service competition in parts of Minnesota outside the Twin Cities metro area. Provide any document that you believe supports your answer.

Response by AT&T: The assets that Forged Fiber 37, LLC will be acquiring are located within the Twin Cities metro area, and the initial improved services as a result of the transaction first will be felt there. While AT&T has announced plans to double the size of its fiber network across the country to pass 60 million locations by 2030, AT&T is still

identifying specific areas for expansion, and thus any impact outside the Twin Cities metro area cannot be delineated at this time.

Response by Lumen: See AT&T's response.

4. Please describe and provide the product name for all services that Lumen currently provides using assets that will be transferred if the Transaction is completed.

Response from AT&T: See Lumen's response.

Response from Lumen: Please see the chart below which identifies products using the assets to be transferred. As noted previously and in the Petition, Lumen will retain all voice services and VoIP customers.

Fiber Internet

100M/100M
200M/200M
500M/500M
940M/940M
1G/1G
2G/2G
3G/3G
8G/8G
Connected
Voice
Voice Line
Long
Distance
Calling
Features

VoIP

Voice (aka POTS)

5. With respect to retail customers who are currently served by Lumen using fiber facilities to be transferred to AT&T Networks and will continue to be served by Lumen if the Transaction is completed, please answer the following questions:
 - A. Who will those customers contact if they experience trouble with their service?
 - B. Will necessary maintenance and repair of those facilities be provided by employees or contractors?
 - C. Who will retain employees or contractors who provide any necessary maintenance and repair of those facilities

A. *Response by AT&T and Lumen:* After the transaction is closed, telephone service interruptions should be reported to Lumen just as they are today. Problems with AT&T broadband service should be reported to AT&T.

B. *Response by AT&T:*

Forged Fiber 37, LLC is still developing staffing plans, but it plans to offer employment to a number of Lumen employees, which will be new jobs. Forged Fiber 37, LLC is currently reviewing the employment needs for the acquired business, expects to hire additional employees, and may also use contractors for such work. It anticipates many employees will be located in Minnesota. Forged Fiber 37, LLC is continuing to develop staffing plans as the Applicants proceed towards completing the Transaction.

Response by Lumen: See AT&T's response.

C. *Response by AT&T and Lumen:* AT&T and Lumen will enter into a Fiber Connectivity Services Agreement pursuant to which AT&T will provide fiber connectivity to Lumen for at least 3 years. The agreement will address fiber connectivity operation, maintenance, and repairs to enable Lumen to maintain continuity of service for its voice customers. Please also see the response to subpart 5(b), above.

6. With respect to the "construction capabilities" to be transferred by Lumen to AT&T Networks in the Transaction (see Petition at page 7), please answer the following questions:

- A.** What positions and how many employees in each position currently provide these construction capabilities?
- B.** What positions and how many of those construction employees will be offered employment with AT&T?
- C.** Are those construction employees who are currently providing construction capabilities to be transferred as part of the Transaction currently subject to a collective bargaining agreement?
- D.** Will employees who are offered employment with AT&T be employed pursuant to a collective bargaining agreement?
- E.** If a current Lumen employee declines an offer of employment with AT&T, will Lumen continue to employ that employee?

A. *Response by AT&T:* See Lumen's response.

Response by Lumen: "Construction capabilities" include the following positions with associated current Minnesota headcounts provided:

Network Implementation technicians - [NOT PUBLIC INFORMATION BEGINS
NOT PUBLIC INFORMATION ENDS]

Supervisors [NOT PUBLIC INFORMATION BEGINS NOT PUBLIC
INFORMATION ENDS]

Managers [NOT PUBLIC INFORMATION BEGINS NOT PUBLIC
INFORMATION ENDS]

Network Implementation Program Managers [NOT PUBLIC INFORMATION
BEGINS NOT PUBLIC INFORMATION ENDS]. These positions support
construction as well as other responsibilities.

B. Response by AT&T: Please see the response to CWA-5(b) above.

Response by Lumen: See AT&T's response.

C. Response by AT&T and Lumen:

As explained in the joint response of AT&T and Lumen to Information Request DOC-1, subpart (a), Forged Fiber 37, LLC will offer employment to a number of Lumen employees, which will be new jobs. Employees will not be "transferred" as part of the transaction. Network Technicians employed by Lumen that may be offered employment by AT&T are currently subject to a collective bargaining agreement. The other positions identified in part 6A are not.

D. Response by AT&T:

As explained in the joint response of AT&T and Lumen to Information Request DOC-1, subpart (a), Forged Fiber 37, LLC currently is reviewing the employment needs for the acquired business and will offer employment to a number of Lumen employees, which will be new jobs. To the extent that AT&T makes any offers of employment that are accepted by Lumen employees, those employees may be covered by a collective bargaining agreement if there is a labor contract that represents their title in the geography into which they are hired. AT&T is proud to be the largest employer of union-represented employees in the U.S. telecommunications industry.

Response by Lumen: See AT&T's response.

E. *Response by AT&T:* See Lumen's response.

Response by Lumen: If an employee declines an offer of employment from AT&T, there will be no immediate impact to the employee's employment at Lumen.

7. In the Petition, at page 9, it states "The Transaction will expand investment in critical connectivity infrastructure, create new jobs, accelerate the deployment of high-speed fiber internet access, and deliver additional benefits by enabling more consumers and small businesses to leverage this high-speed connectivity." Will these benefits be available in portions of Minnesota outside the Twin Cities metro area? If your answer is "yes," please provide all documents that you contend support your response.

Response by AT&T and Lumen: The referenced part of the application relates to benefits associated with investment in critical connectivity infrastructure, which can include new jobs more broadly, not just with the Applicants, and not just within the area of the transferred assets.

8. In the Petition, at page 13, it states, "[C]ombining the Lumen Mass Markets fiber business and AT&T Mobility under common ownership will give Minnesota residents access to converged wireline and wireless broadband services from a single provider." Will Minnesotans residing outside of the Twin Cities metro area receive this benefit as a result of the Transaction?

Response by AT&T: The transferred assets are located within the Twin Cities metropolitan area. AT&T plans to expand its fiber network across the country to pass approximately 60 million locations by 2030. The specific areas for expansion are still being identified, though, consistent with Minnesota's broadband goals expressed in Minn. Stat. § 237.011, AT&T will be focusing on those areas where broadband can be deployed in an economically efficient manner.

Response by Lumen: See AT&T's response.

9. Is Lumen currently in full compliance with the Commission's order in Docket No. P-421/C-20-432? If your answer is "yes," please provide all documents that you contend support your response. If your answer is "no," please describe all aspects in which Lumen is not in full compliance, describe Lumen's plans for coming into compliance, and provide all documents that you contend support your response.

Response by AT&T: See Lumen's response.

Response by Lumen: Lumen's compliance with this Commission Order in a separate docket is outside the scope of this matter. That said, Lumen refers to its most recent compliance filing in docket 20-432, dated May 23, 2025.

10. Provide copies of any document that describes the terms of the Plant Pride Program adopted pursuant to the Commission's order in Docket No. P-421/C-20-432 and state the date when such document was provided to the CWA or Lumen employees.

Response by AT&T: See Lumen's response.

Response by Lumen: The Plant Pride Program is outside the scope of this matter. That said, the requested information was provided to the CWA in Supplemental Response to DOC IR 111 in Docket No. P-421/C-20-432, served February 25, 2025 on Stan Gosch of the CWA. A copy of the public version of that response is provided with these responses. We will provide a copy of the confidential response upon execution of a non-disclosure agreement.

11. What effect will approval of the Transaction have on Lumen's participation in the Plant Pride Program?

Response by AT&T: See Lumen's response.

Response by Lumen: None.

12. Describe how Lumen intends to stay in compliance with the Commission's order in Docket No. P-421 after the closing of the Transaction? Provide any documents that support your response.

Response by AT&T: See Lumen's response.

Response by Lumen: See Lumen's response to CWA IR No. 9. Lumen does not anticipate changes to its compliance efforts as a result of this transaction.

13. Will Lumen have the resources to maintain its remaining copper network without the income generated by its fiber business? Provide any documents that support your response.

Response by AT&T: See Lumen's response.

Response by Lumen: Yes.

- 14.** Does Lumen intend to file for discontinuance of its legacy service, either in its entirety or in any portion or portions of the state, after closing of this Transaction? If so, please provide all information related to Lumen's copper retirement plans in Minnesota.

Response by AT&T: See Lumen's response.

Response by Lumen: Lumen's plans with respect to legacy service and potential copper retirements are outside the scope of this matter. That said, Lumen's plans regarding these matters are not affected by this transaction. As noted in the Petition, Lumen will maintain its voice customers and will remain subject to the regulatory obligations associated with legacy voice services.

- 15.** Does Lumen plan to deploy any additional fiber in Minnesota after the closing of this Transaction? Provide all documents and information concerning Lumen's plans to deploy additional copper fiber.

Response by AT&T: See Lumen's response.

Response by Lumen: Lumen assumes that this question is focused on the potential deployment of additional fiber, not copper. Lumen's future plans with respect to additional fiber deployment is outside the scope of this matter and is not a factor that is relevant to the Commission's consideration of this matter.

Attachment B

To Whom it may Concern,

I am filing this complaint regarding my telephone service with Centurylink.

My telephone service went out on November 6, 2024. Partial service was not restored until February 27, 2025, and even now there is a loud hum on the line making the phone unreliable.

During this outage, I contacted Centurylink multiple times. I was told by a Centurylink representative that the company had no one available to repair the line. When I stated I wished to remain a customer, the representative told me, we aren't going to fix it and suggested I switch to another provider.

Despite this, Centurylink continued to bill me in full for the entire period my line was unusable, and I even received a disconnect notice. In addition I even received late fees on my account.

Sincerely,
Ms. Scroggins.
651-224-0787

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