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April 22, 2020

Dear Public Utilities Commission Members,

I intend this letter to serve as a formal complaint regarding the services provide by the Qwest Corporation, d/b/a CenturyLink in Minnesota, on behalf of the Communications Workers of America (CWA). CenturyLink's Regional Headquarters is located at: 931 14th Street, Denver CO 80202.

CWA represents over a thousand CenturyLink employees in Minnesota—including both “outside” employees such as Network Technicians, and “inside” employees such as call center employees.

Through informal interviews with both inside and outside employees, it is clear that CenturyLink is not meeting the service requirement standards set forth in Minnesota Rules Chapter 7810, and has not been for quite some time, long before the pressures of COVID-19 has affected our work, our communities and our world. Specifically, the Company has not been meeting the requirements in each of the sections below, either fully or partially;

7810.2800. DELAY IN INITIAL SERVICE
7810.3300 MAINTENANCE OF PLANT AND EQUIPMENT
7810.5500 TRANSMISSION REQUIREMENTS
7810.5800 INTERRUPTIONS OF SERVICE
7810.5900 CUSTOMER TROUBLE REPORTS
7810.6000 PROTECTIVE MEASURES

For one example, Minnesota Rule 7810.2800 require 90% of installs and upgrades to be met within 24 hours. Technicians report that new dial tone installs have generally been delayed by over a week for the past several months (prior to the pandemic) and by the end of March were being delayed by three weeks. The Company has also failed to maintain its physical plant (attached are a few photos of CenturyLink equipment that has remained unrepaired for months).

Amidst the COVID-19 crisis, when both POTS and HSI are more essential to our community than ever, not only is CenturyLink failing to meet its basic obligations, but intends to layoff 154 Technicians in Minnesota—140 of them the Twin Cities alone. In St. Paul and surrounding communities, the Technician layoffs amount to approximately 63% of the total for the area. The layoffs in Minneapolis amounts to 37%. These layoffs were announced on February 21, prior to COVID-19's entry into Minnesota and are scheduled to take place on May 21, 2020.

If CenturyLink could not meet its obligations to Minnesotans in January, and the inevitable reduction in productivity resulting from the additional safety precautions necessary to avoid Technicians bringing COVID from one customer to the next, what would the service delays be with a 46% reduction in the

Technician pool in the Twin Cities. While the Company has hired a few contractors, they are not nearly enough to handle the existing workload. Furthermore, past experience has shown contractors are much less productive due to lack of training, lack of familiarity with CenturyLink's processes and equipment, and often lack of experience.

Other companies providing similar critical services such as Charter Communications are taking exactly the opposite approach. Charter announced a non-layoff policy for at least 60 days amidst this crisis and offered employee pay increases for the added stresses and risks involved in providing critical communications services. The Company's press release makes it clear: "These employees are providing the critical services that allow for uninterrupted internet, telephone and TV news for more than 29 million customers including lifeline institutions like hospitals, first responders and government facilities. We are grateful for their around-the-clock work supporting and maintaining our customers' residential and business connectivity needs during the COVID-19 health and economic crisis,"

The Union has brought these issues to CenturyLink and requested a delay in the layoffs, and to date, the Company has refused to consider this option.

CWA urges the PUC to investigate CenturyLink's performance *vis-à-vis* the service requirements in Minnesota Rules 7810. We believe it will be clear CenturyLink is not serving the people of Minnesota appropriately. Secondly, we urge the PUC to seek an injunction delaying the layoffs until such time as CenturyLink meets its service obligations.

In this time of crisis, when so many people are forced to work from home, educate their children by phone and internet, and are trying to maintain relationships with the outside world, let alone retain access to 911 services, it is abhorrent that CenturyLink would take its responsibility so lightly and so significantly reduce its ability to even minimally provide effective phone and internet services to Minnesotans.

Sincerely,



Jeff S. Lacher