

OAG EXHIBIT A

CENTURYLINK RESPONSES TO OAG IRs

**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

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) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Max Kieley **Date of Request:** September 29, 2020
Telephone: (651) 757-1244 **Due Date:** October 13, 2020

CWA's formal complaint filed on August 18, 2020, states that "CenturyLink Technicians have direct knowledge and have reported instructions from CenturyLink managers to avoid replacing subpar, damaged, or immersed cables as a cost-saving measure, despite clear indications that the cables need replacement." Please provide a narrative explaining all relevant facts and identifying all relevant documents regarding: (1) all CenturyLink policies or practices related to the maintenance, repair, and replacement of its outdoor plant; and (2) CenturyLink's annual budget allocated to the maintenance, repair, and replacement of its outdoor plant.

Objections:

CenturyLink objects to the request asking for "all relevant facts and all relevant documents." Such a request is vague, overbroad, a premature contention interrogatory and not reasonably calculated to lead to discoverable evidence. The Commission has not instituted a formal complaint proceeding and therefore CenturyLink cannot know all documents and facts relevant to claims that might be made there. CenturyLink will identify information it relied upon to provide its explanation.

Response:

CenturyLink maintains its network through a maintenance budget, transformation budget, and capital budget.

Response by _____
Title _____
Department _____
Telephone _____

State Of Minnesota
Office Of The Attorney General
Utility Information Request

[Not Public Data Begins

Response by _____
Title _____
Department _____
Telephone _____

PUBLIC DOCUMENT
NOT PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED

State Of Minnesota
Office Of The Attorney General
Utility Information Request

Not Public Data Ends]

Response by _____
Title _____
Department _____
Telephone _____

PUBLIC DOCUMENT
NOT PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED

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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) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Max Kieley
Telephone: (651) 757-1244

Date of Request: September 29, 2020
Due Date: October 13, 2020

According to CenturyLink's September 18, 2020 comments, the Commission reviewed the Company's complaint tracking process related to TAP in Docket No. 17-196. However, in addition to being limited to TAP complaints, that docket appears to contain different and more abbreviated complaint information than the repair ticket information provided on page 9 CenturyLink's comments. Accordingly, for the period from January 1, 2020 to the date of these IRs, please provide a copy of all of the trouble reports and customer repair tickets received by the Company. Also, if the trouble reports and customer repair tickets are missing any of the information listed on page 9 of CenturyLink's comments, please located and provide the missing information. Finally, for the period from January 1, 2020 to the date of these IRs, please provide copies of all complaints filed by Minnesota "state agencies or other outside groups" and explain how they have been resolved by the Company's Customer Advocacy Group (see CenturyLink comments at pg. 9).

Objections:

CenturyLink objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink has requested the data responsive to this request and estimates it will take two additional weeks to compile.

Response:

Notwithstanding and without waiving these objections,

1. Responding fully to this request would require production of approximately [Not Public Data Begins Not Public Data Ends] customer care records. Not Public Attachment 9 is a randomly generated list of 25 customer care records from between January through the end of August, 2020.
2. CenturyLink is gathering information responsive to this request and will produce it at a later date.

Response by _____
Title _____
Department _____
Telephone _____

**PUBLIC DOCUMENT
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DATA HAS BEEN EXCISED**

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Supplemental Response – 10/29/20

1. See Not Public Attachment 9-1 for an additional 500 randomly selected customer care records from between January through the end of August 2020.
2. Attached are the complaints received from Minnesota state agencies or other outside groups and CenturyLink's responses to those complaints (Not Public CTL 9-00001 – CTL 9-00785). In the interest of producing these documents as soon as possible, the documents are being produced as not public information.

Response by _____
Title _____
Department _____
Telephone _____

Attachment 9-1
and
Complaints and CTL
Responses (CTL 9-00001 –
CTL 9-00785)

Have Been Redacted in Their
Entirety

OAG No. 016

**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

*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)*

MPUC Docket No. P-421/C-20-432

Requested from: CenturyLink

Requested By: Max Kieley
Telephone: (651) 757-1244

Date of Request: September 29, 2020
Due Date: October 13, 2020

CenturyLink's comments filed on September 18, 2020, state that the Company has "an objective of completing repair of 95% of out of service conditions within 24 hours. CenturyLink complies with its obligations under the rules and its year to date calculation using the methodology under its expired Alternative Form of Regulation Plan is close to the 95% figure." Please provide the following: (1) the actual percentage of out-of-service conditions CenturyLink has repaired within 24 hours as calculated in accordance with the Company's "year to date calculation using the methodology under its expired Alternative Form of Regulation Plan"; and (2) a narrative explaining in greater detail all relevant facts and identifying all relevant documents supporting CenturyLink's statement above.

Objections:

CenturyLink objects to the request asking for "all relevant facts and all relevant documents supporting CenturyLink's statement." Such a request is vague, overbroad, a premature contention interrogatory and not reasonably calculated to lead to discoverable evidence. The Commission has not instituted a formal complaint proceeding and therefore CenturyLink cannot know all documents and facts relevant to claims that might be made there.

Response:

Notwithstanding and without waiving these objections, see chart below:

[Not Public Data Begins

Not Public Data Ends]

Response by _____
Title _____
Department _____
Telephone _____

**PUBLIC DOCUMENT
NOT PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED**

OAG No. 017

**State of Minnesota
Office of the Attorney General
Utility Information Request**

In the Matter of 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) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Kristin Berkland
Telephone: (651) 757-1236

Date of Request: May 26, 2021
Due Date: June 8, 2021

Reference: Minn. R. 7810.0600 (Report to Commission on Service Disruption); Minn. R. 7810.5800 (Interruptions of Service)

For the period from January 1, 2020 to the date of this IR, provide all notices and reports made to the Commission about service disruptions and interruptions of service under Minn. R. 7810.0600 and Minn. R. 7810.5800.

Response:

See Attachment 17A for notifications automatically generated and sent to the Commission and Attachment 17B for emails sent to the Commission about outages.

Response by _____
Title _____
Department _____
Telephone _____

From: Regulatory NEMC
Sent: Tuesday, November 17, 2020 12:29 PM
To: Hankins, Ted M
Subject: PUC_MN.111720.001_F

CenturyLink
Docket No. P-421/C-20-432
June 9, 2021
Attachment 17A



PUC Report

Report Number : MN.111720.001
Impacted Company : Lumen
Date and Time : 17-NOV-2020 10:35:00
TIMEZONE : CST
For Questions
Contact : Ted Hankins 318- 388-9416
LAKE CITY/MN,ALEXANDRIA/MN,GROVE
CITY/MN,GRANITE
Reason for Outage
Notification : FALLS/MN,VILLARD/MN,BROWERVILLE/MN,LONG
PRAIRIE/MN,Saint James,Plainview switches were not
processing toll calls.
Cause of Outage : UNKNOWN
/MN,LAKE CITY/MN,ALEXANDRIA/MN,GROVE
Location of Outage : CITY/MN,GRANITE
: FALLS/MN,VILLARD/MN,BROWERVILLE/MN,LONG
PRAIRIE/MN
Exchange Name /
Wire Center : LKCYMNXLRS0
Expected Duration : 17-NOV-2020 14:48:29
Actual Duration : 00:59:00
Number of
Customers : 12810
Services Affected : 911,TOLL SWITCH ISOLATION
Agencies Notified : PSAPs
Significant Update :
Service restored without conclusive repair information;
there may be further analysis and discovery as the event is
Resolution : reviewed by NOC management. If additional issues are
experienced, please contact the appropriate CenturyLink
Repair Center.
Restore Date/Time : 17-NOV-2020 11:34:00

From: Regulatory NEMC
Sent: Monday, January 11, 2021 9:14 PM
To: Hankins, Ted M
Subject: PUC_MN.011121.001_F



PUC Report

Report Number : MN.011121.001
Impacted Company : Lumen
Date and Time : 11-JAN-2021 14:43:27
TIMEZONE : CST
For Questions Contact : Ted Hankins 318- 388-9416
Reason for Outage : The Rochester switch cannot deliver 911/E911 calls to
Notification : PSAPs.
Cause of Outage : AVOIDABLE - LUMEN
Location of Outage : ROCHESTER/MN
Exchange Name / Wire : ROCHMNRO
Center :
Expected Duration : 11-JAN-2021 17:43:27
Actual Duration : 05:01:33
Number of Customers : 161,835
Services Affected : 911
Agencies Notified :
Significant Update :
Resolution : Tier III Technical support removed a cross connect to
restore services.
Restore Date/Time : 11-JAN-2021 19:45:00

--Disclaimer--

From: nilnotif@lumen.com
Sent: Friday, April 30, 2021 7:23 AM
To: Hankins, Ted M
Subject: MN.042921.002 ~ Local Transport Network Event ~ New Brighton, MN ~ Minor ~ Final



Network(s)	Local
Location(s)	NEW BRIGHTON/MN
NIL Level; Status	MINOR; FINAL (F)
Failure Category	TRANSPORT
Outage Classification	MULTIPLEXER
System/Vendor	CALIX
System/Network Element Brand	E7
Current Status	The defective card was replaced and services have been restored. If additional issues are experienced, please contact the appropriate Lumen Repair Center.
Description Of Trouble	Customers in the New Brighton, MN area were unable to access the Internet
Services Affected/Impacts	DSL(DSL Subscriber Count 1114)
Primary CLLI; Associated CLLI(s)	NWBTMNCLOL1
Root Cause	EQUIPMENT - CTL
Component Failed	CARD
Incident Date & Time	04/29/21 18:52:00 CDT
Restore Date & Time	04/30/21 00:12:00 CDT
Duration Of Outage	05:20:00
Restoration Details	Technicians replaced a faulty card thus restoring services to a stable state.
Associated Ticket #'s	NTM000024813073 NTM SE12901 WFAC - Primary NTM000024813105 NTM EM380050 WFAC
Originating Center	BROADBAND GRPC
Assigned Center	TRANSPORT GRPC - LOCAL
Organizations Notified	DISPATCH,TRANSPORT GRPC - LOCAL,BROADBAND GRPC,ETHERNET GRPC

Assigned Contact	Jurich, Tamara
Mobile Details Page	Visit Mobile Details Page

Event Management Team : 800-879-1200

CONFIDENTIAL INFORMATION AND/OR PROPRIETARY INFORMATION NOTICE. This information is confidential and/or proprietary to Lumen. Any use of this information by recipient shall adhere to and conform with the Nondisclosure/Confidentiality terms and conditions of the Agreement between recipient and Lumen, as well as the requirements of the Telecommunications Act of 1996 and any FCC orders dealing with use of confidential or proprietary information.

NOTICE: PROPRIETARY AND COMPETITIVELY SENSITIVE. To be released only under appropriate protective arrangements. The data contained herein is preliminary and may not reflect a service interruption. The details may not be an accurate or complete depiction of the event.

From: Regulatory NEMC
Sent: Wednesday, May 19, 2021 11:59 AM
To: Hankins, Ted M
Subject: PUC_MN.051921.001_I_F



PUC Report

Report Number : MN.051921.001
Impacted Company : Lumen
Date and Time : 18-MAY-2021 01:51:00
TIMEZONE : CDT
For Questions Contact : Ted Hankins 318- 388-9416
Reason for Outage Notification : Lumen was unable to deliver location information (ANI/ALI) to some PSAPs in state due to vendor partner maintenance.
Cause of Outage : Under Investigation
Location of Outage : MINNEAPOLIS/MN,BISMARCK/ND,CASTLE ROCK/CO,NM
Exchange Name / Wire Center : MPLSMNDTDS7
Expected Duration : 18-MAY-2021 05:00:00
Actual Duration : 01:20:00
Number of Customers : 586148
Services Affected : 911 ANI/ALI
Agencies Notified : PSAPs
Significant Update :
Resolution : Vendor partner backed out of maintenance
Restore Date/Time : 18-MAY-2021 03:11:00

--Disclaimer--

Report Title: NORS Outage Report Details
Run Date and Time: 2021-05-20 15:25:05 Eastern Daylight Time
Run by: Laura Garcia
Table name: u_nors_outage_report

NORS Outage Report

Company:	LUMEN	Outage Number:	ON-00233205
Type of Reporting Entity:	Wireline Carrier	Report Type:	Initial

Reopened Submitted:

false

Previous Report Type:

Notification

Reopen Submitted Comments:

Incident Information

Incident Date and Time:	2021-05-18 12:51:13	Time Zone:	Central
Date and Time Determined Reportable:		Reason Reportable:	E911
Incident Date and Time:	2021-05-18 12:51:13	Failure in Other Company?:	No
Date and Time Determined Reportable:			
Outage Duration (Hours):	1		
Outage Duration (Minutes):	20		
Explanation of Outage Duration:			
Inside Building Indicator:			
E911 Outage:	ALI Only Affected		

Services Affected

Cable Telephone:

false

Wireless (not paging):

false

VoIP:

false

E911 :

true

Paging:

false

Satellite:

false

Signaling (SS7):

false

Wireline:
false
Special Facilities:
false
Other Service:
false
Other Service Description:

Number of Potentially Affected

Wireline Users Affected:	785,559	Paging Users Affected:	
Wireless Users Affected:		Cable Telephone Users Affected:	
VoIP Users Affected:		Satellite Users Affected:	
OC3s Affected:			
Number of Blocked Calls:		Blocked Calls Realtime:	false
		Blocked Calls Historic:	false
Number of Lost SS7 MTP Messages:		Lost SS7 Messages Realtime:	false
		Lost SS7 Messages Historic:	false
Mobile Switching Center (MSC) Failed:	N/A		

State Affected:

MULTI STATES

City Affected:

Multiple

More Complete Description of Geographic Area Affected:
--

Description of Incident:

Lumen was unable to deliver local information (ANI/ALI) to some PSAPs in MN, ND, NE, CO and NM

Description of the Cause(s) of the Outage:
--

This outage was caused whe Lumens NG911 vendor partner was performing maintenance. Details are under investigation.

Direct Cause:

Insufficient Data - Under Investigation

Root Cause:

Insufficient Data - Under Investigation

Contributing Factor 1:

Contributing Factor 2:

Lack of Diversity:	No
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Malicious Activity:	No
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If yes - please explain Malicious Activity:

Name and Type of Failed Equipment:

Under investigation

Specific Part of Network Involved:

E911

Method(s) Used to Restore Service:

The vendor partner backed out of the maintenance and service restored.

Was Telecommunications Service
Priority involved in Service
Restoration?: No

Steps Taken to Prevent Recurrence:

Applicable Best Practices that might've prevented Outage or reduced effects:

Best Practices used to mitigate effects of Outage:

Reason for Withdrawal:

Analysis of Best Practice:

Remarks:

Assignments

Assignment Reason Assigned #1:

Assignment Person Assigned #1:

Assignment Other Assigned Reason
#1:

Assignment Group Number:

Assignment Reason Assigned #2:

Assignment Person Assigned #2:

Assignment Other Assigned Reason
#2:

Primary Contact Information

Select a User:

Name:

Stacy Hartman

Phone Number: 7205783421

Extension:

Email Address:

stacy.hartman@centurylink.com

Address Line 1:

Address Line 2:

Address Line 3:

Secondary Contact Information

Select a User:

Name:

Laura Garcia

Phone Number: 17208888961

Extension:

Email Address:

laura.knodel@centurylink.com

Address Line 1:

Address Line 2:

Address Line 3:

Related List Title: Sys Audit List

Table name: sys_audit

Query Condition: Table Name = u_nors_outage_report AND Document Key = e6756edc1bd0f410e4ec848ce54bcb8a8

Sort Order: None

19 Sys Audits

Created	Table Name	Field Name	Document Key	Update count	User	Old value	New value
2021-05-20 15:24:55	u_nors_outage_report	u_malicious_act	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_network_part_description	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_wireline_users_affected	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_secondary_contact_string	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_duration_minutes	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_cause_description	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_equipment_failure_description	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_direct_cause	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_secondary_phone	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_msc_failed_index	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_lack_of_diversity	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_e911_affected_index	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_outage_report_status	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_root_cause	e6756edc1bd0f410e4ec848ce54bcb8a8	1	laura.knodel@centurylink.com		

Created	Table Name	Field Name	Document Key	Update count	User	Old value	New value
2021-05-20 15:24:55	u_nors_outage_report	u_restore_method_description	e6756edc1bd0f410e4ec848ce54bcba8	1	laura.knode1@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_initial_created	e6756edc1bd0f410e4ec848ce54bcba8	1	laura.knode1@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_telcom_service_priority_ind	e6756edc1bd0f410e4ec848ce54bcba8	1	laura.knode1@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_secondary_email	e6756edc1bd0f410e4ec848ce54bcba8	1	laura.knode1@centurylink.com		
2021-05-20 15:24:55	u_nors_outage_report	u_duration_hours	e6756edc1bd0f410e4ec848ce54bcba8	1	laura.knode1@centurylink.com		

Related List Title: NORSH Outage Report List

Table name: u_norsh_outage_report

Query Condition: Original Sys Id = ON-00233205 AND Company in (LEVEL 3 COMMUNICATIONS, LLC, CENTURYTEL, QWEST-EL PASO TEL, LUMEN, GLOBAL CROSSING, QCC - QWEST COMMUNICATIONS CORP., TW TELECOM, QWEST-MALHEUR BELL, EMBARQ, QWEST), [...] .or. Created By User is Laura Garcia

Sort Order: Updated At in descending order

2 NORSH Outage Reports

Report Type	Previous Report Type	Updated by	▼ Updated At
Initial	Notification	laura.knode1@centurylink.com	2021-05-20 15:24:55
Notification		laura.knode1@centurylink.com	2021-05-19 12:31:23

From: nilnotif@lumen.com
Sent: Wednesday, May 26, 2021 4:28 AM
To: Hankins, Ted M
Subject: MN.052521.009 ~ Local Transport Network Event ~ Maplewood, MN ~ Informational ~ Final



Network(s)	Local
Location(s)	MAPLEWOOD/MN
NIL Level; Status	INFORMATIONAL ; FINAL (F)
Failure Category	CABLE
Outage Classification	FIBER CABLE
System/Vendor	CABLE
System/Network Element Brand	CUT
Current Status	The cut fiber was repaired and services have been restored. If additional issues are experienced, please contact the appropriate CenturyLink Repair Center.
Description Of Trouble	OC3 down 1 STS due to fiber cut.
Services Affected/Impacts	FACILITY(OC-3 1)
Primary CLLI; Associated CLLI(s)	MPWDMNMAH03
Root Cause	HUMAN ERROR - PUBLIC
Component Failed	FIBER CABLE
Incident Date & Time	05/25/21 17:09:19 CDT
Restore Date & Time	05/25/21 18:24:00 CDT
Duration Of Outage	01:14:41
Restoration Details	Cut fiber repaired.
Associated Ticket #'s	EM380414 WFAC - Primary
Originating Center	TRANSPORT GRPC - LOCAL
Assigned Center	TRANSPORT GRPC - LOCAL
Organizations Notified	DISPATCH,TRANSPORT GRPC - LOCAL
Assigned Contact	Sebastiani, Mark
Mobile Details Page	Visit Mobile Details Page

Event Management Team : 800-879-1200

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From: Regulatory NEMC
Sent: Tuesday, May 25, 2021 1:35 PM
To: Hankins, Ted M
Subject: PUC_MN.052521.006_F



PUC Report

Report Number : MN.052521.006
Impacted Company : Lumen
Date and Time : 25-MAY-2021 10:42:25
TIMEZONE : CDT
For Questions Contact : Ted Hankins 318- 388-9416
Reason for Outage : Lumen failed to deliver 911 location Information
Notification : (ANI/ALI) to PSAP(s).
Cause of Outage : Router functionality
Location of Outage : ALBERT LEA/MN
Exchange Name / Wire Center : ALLEMNALDS0
Expected Duration : 25-MAY-2021 17:00:00
Actual Duration : 02:02:35
Number of Customers : 10,235
Services Affected : 911 ANI/ALI
Agencies Notified : PSAP
Significant Update :
Resolution : A network device was successfully rebooted, thus restoring all services to a stable state.
Restore Date/Time : 25-MAY-2021 12:45:00

--Disclaimer--

PUBLIC DOCUMENT -
NOT PUBLIC DATA HAS BEEN EXCISED

From:	Topp, Jason D	CenturyLink
Sent:	Tuesday, July 21, 2020 11:34 AM	Docket No. P-421/C-20-432
To:	Doyle, Greg (COMM); Rebholz, Michelle (PUC)	June 9, 2021
Cc:	Bailey, Dana	Attachment 17B

Greg:

We are having an issue with 911 access 211 in Gunflint. Apparently there has been some violent weather up there.

From: Topp, Jason D
Sent: Thursday, August 20, 2020 9:25 PM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)

Greg and Michelle

I am Getting a report that there is an outage in Villard, MN affecting 911 for just over 300 customers.

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From: Topp, Jason D
Sent: Sunday, August 30, 2020 6:54 PM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Cc: Schriner, Andrew; Bailey, Dana; Barthel, Dianne
Subject: Re:

Greg and Michelle

I got a message that the issue resolved shortly after my last message. We are not aware of any 911 impact.

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From: Topp, Jason D
Sent: Sunday, August 30, 2020 12:22:26 PM
To: Doyle, Greg (COMM) <greg.doyle@state.mn.us>; Rebholz, Michelle (PUC) <michelle.rebholz@state.mn.us>
Cc: Schriner, Andrew <Andrew.Schriner@CenturyLink.com>; Bailey, Dana <Dana.Bailey@centurylink.com>; Barthel, Dianne <Dianne.Barthel@CenturyLink.com>
Subject:

Greg and Michelle

CenturyLink is dealing with an IP outage. I do not know if it affecting Minnesota. The statement I received from corporate communications appears below. If a new statement comes out I will forward it.

We are working hard to fix an IP outage that is affecting several markets and have begun to see restoration in several areas. We know how important this service is for all of our customers, and we've pulled in every resource available to resolve the outage as soon as we are able. While we currently do not have an estimate time for complete resolution, we will continue to provide additional updates as they are available.

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From: Topp, Jason D
Sent: Wednesday, September 9, 2020 5:02 PM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Cc: Bailey, Dana
Subject: RE:

Now the internal notices indicate:

6,193 voice customer lines "toll isolated, " and

8,860 "911 impacted." It is unclear to me what "impacted" means and I do not want to get in the way of people working to fix this. They have excavated both ends of the cut fiber and are starting the process to splice them together.

From: Topp, Jason D <Jason.Topp@CenturyLink.com>
Sent: Wednesday, September 9, 2020 2:15 PM
To: Doyle, Greg (COMM) <greg.doyle@state.mn.us>; Rebholz, Michelle (PUC) <michelle.rebholz@state.mn.us>
Subject: Re:

Looks like a fiber cut by a MNDot contractor. If I am understanding the acronyms correctly, it appears that the backup systems have allowed 911 calls to complete although there may be some other network impacts.

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From: Topp, Jason D
Sent: Wednesday, September 9, 2020 11:55:44 AM
To: Doyle, Greg (COMM) <greg.doyle@state.mn.us>; Rebholz, Michelle (PUC) <michelle.rebholz@state.mn.us>
Subject:

Greg and Michelle

We are getting word of an outage in southern Minnesota affecting 911. We are trying to determine the areas and services affected. I will follow up when I have more solid information.

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From: Topp, Jason D
Sent: Monday, September 28, 2020 9:22 PM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Subject: Re:

I will defer to the automatic PUC reports. One was sent at 8:57.

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From: Topp, Jason D
Sent: Monday, September 28, 2020 7:33:30 PM
To: Doyle, Greg (COMM) <greg.doyle@state.mn.us>; Rebholz, Michelle (PUC) <michelle.rebholz@state.mn.us>
Subject:

There is a 911 outage going on. Reports say it is multistate. Not sure if it is a CENTURYLINK issue but it is affecting metro counties. I will update you when I have a better handle on the situation.

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From: Topp, Jason D
Sent: Tuesday, September 29, 2020 7:50 AM
To: Doyle, Greg (COMM)
Subject: Fwd: PUC_CO.092820.002_I_F (MN)

Greg

Per you request.

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From: Regulatory.NEMC@lumen.com <Regulatory.NEMC@lumen.com>
Sent: Monday, September 28, 2020 8:57 PM
To: Topp, Jason D
Subject: PUC_CO.092820.002_I_F (MN)



PUC Report

Report Number : CO.092820.002
Impacted Company : CenturyLink
Date and Time : 28-SEP-2020 17:20:00
TIMEZONE : CDT
For Questions Contact : Al Lubeck 913-353-7074
Reason for Outage : CenturyLink was unable to deliver E911 calls to some
Notification : PSAPs
Cause of Outage : Design Software - Vendor
Location of Outage : Multi-state
Exchange Name / Wire Center : Multiple
Expected Duration : 28-SEP-2020 21:00:00
Actual Duration : 01:08:00
Number of Customers : 1,500,000
Services Affected : 911
Agencies Notified : PSAPs
Significant Update :
Resolution : NG911 vendor partner restored service. Details under investigation.
Restore Date/Time : 28-SEP-2020 17:28:00

From: Topp, Jason D
Sent: Wednesday, October 28, 2020 7:42 AM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Subject: Re: Pipestone Fiber Cut

Sorry, I misread the clock, duration was 10 hours and 21 minutes and cleared at 7:40 yesterday evening.

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From: Topp, Jason D <Jason.Topp@CenturyLink.com>
Sent: Wednesday, October 28, 2020 7:39 AM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Subject: Pipestone Fiber Cut

There was a fiber cut yesterday in Pipestone that knocked out toll Andes 911 to 506 customers. Duration was approximately 12 hours and cleared at approximately 9 last night.

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From: Topp, Jason D
Sent: Tuesday, November 17, 2020 12:43 PM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Subject: Re: PUC_MN.111720.001_I

Cleared at 12:08. We know toll was affected but do not have testing back on 911.
Get [Outlook for iOS](#)

From: Doyle, Greg (COMM) <greg.doyle@state.mn.us>
Sent: Tuesday, November 17, 2020 12:39:51 PM
To: Topp, Jason D <Jason.Topp@CenturyLink.com>
Subject: RE: PUC_MN.111720.001_I

Got it. Thanks.

Greg Doyle
Manager, Telecommunications
651-539-1875
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101



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From: Topp, Jason D <Jason.Topp@lumen.com>
Sent: Tuesday, November 17, 2020 11:42 AM
To: Doyle, Greg (COMM) <greg.doyle@state.mn.us>; Rebholz, Michelle (PUC) <michelle.rebholz@state.mn.us>
Subject: Fwd: PUC_MN.111720.001_I

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Greg and Michelle- see the notice below that went to the PUC. I do not have any details at this point beyond the notice.

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From: Regulatory.NEMC@lumen.com <Regulatory.NEMC@lumen.com>
Sent: Tuesday, November 17, 2020 11:29 AM

To: Topp, Jason D

Subject: PUC_MN.111720.001_I



PUC Report

Report Number : MN.111720.001
Impacted Company : Lumen
Date and Time : 17-NOV-2020 10:35:00
TIMEZONE : CST
For Questions
Contact : Ted Hankins 318- 388-9416
The LAKE CITY/MN,ALEXANDRIA/MN,GROVE
CITY/MN,GRANITE
Reason for Outage
Notification : FALLS/MN,VILLARD/MN,BROWERVILLE/MN,LONG
PRAIRIE/MN,Saint James, and Plainview switches are
not processing toll calls.
Cause of Outage : Under investigation
/MN,LAKE CITY/MN,ALEXANDRIA/MN,GROVE
Location of Outage : CITY/MN,GRANITE
: FALLS/MN,VILLARD/MN,BROWERVILLE/MN,LONG
PRAIRIE/MN
Exchange Name /
Wire Center : LKCYMNXLRS0
Expected Duration : 17-NOV-2020 14:48:29
Actual Duration : 00:51:18
Number of
Customers : 12810
Services Affected : 911,TOLL SWITCH ISOLATION
Agencies Notified : PSAPs
Significant Update :
Resolution :
Restore Date/Time :

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From: Topp, Jason D
Sent: Monday, January 11, 2021 4:37 PM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Cc: Bailey, Dana
Subject: 911 Outage - Olmsted County area

Greg and Michelle:

We have a 911 outage affecting Olmsted, Rice/Steele, Dodge, Freeborn, and Mower. I have been on a series of call and do not have a lot of information yet. I have seen some media notices in those local areas. I will keep you posted



Jason Topp

Assistant General Counsel
200 S. 5th St., Room 2200
Minneapolis, MN 55402
tel: 651-312-5364 | cell: 612-267-1909
jason.topp@lumen.com

From: Topp, Jason D
Sent: Monday, January 11, 2021 7:35 PM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Subject: Fwd: PUC_MN.011121.001_I

The regulatory report filed today is below.

Get [Outlook for iOS](#)

From: Regulatory.NEMC@lumen.com <Regulatory.NEMC@lumen.com>
Sent: Monday, January 11, 2021 5:34:02 PM
To: Topp, Jason D <Jason.Topp@CenturyLink.com>
Subject: PUC_MN.011121.001_I



PUC Report

Report Number : MN.011121.001
Impacted Company : Lumen
Date and Time : 11-JAN-2021 14:43:27
TIMEZONE : CST
For Questions Contact : Ted Hankins 318- 388-9416
Reason for Outage : The Rochester switch cannot deliver 911/E911 calls to
Notification : PSAPs.
Cause of Outage : Under investigation
Location of Outage : ROCHESTER/MN
Exchange Name / Wire : ROCHMNRO
Center :
Expected Duration : 11-JAN-2021 17:43:27
Actual Duration : 04:47:11
Number of Customers : 161,835
Services Affected : 911
Agencies Notified : PSAP
Significant Update : Services restored on the secondary path at 19:08 CST.
Resolution :
Restore Date/Time :

--Disclaimer--

From: Topp, Jason D
Sent: Thursday, May 20, 2021 11:26 AM
To: Doyle, Greg (COMM)
Subject: RE: PUC_MN.051921.001_I_F

Greg:

I learned of the issue when the notification went out so I felt we were covered by the official notice. I also typically do not send a note for ALI/ANI issues because they are not outages.

From: Doyle, Greg (COMM) <greg.doyle@state.mn.us>
Sent: Thursday, May 20, 2021 11:01 AM
To: Topp, Jason D <Jason.Topp@lumen.com>
Subject: FW: PUC_MN.051921.001_I_F

Hi Jason, the PUC brought the below notification to my attention. Normally you have shared significant outages with me and so I am unclear if there was little impact in MN or if something has changed in terms of notifications. Let me know. Thank you.

Greg Doyle
Manager, Telecommunications
651-539-1875
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101



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From: Regulatory.NEMC@lumen.com <Regulatory.NEMC@lumen.com>
Sent: Wednesday, May 19, 2021 11:59 AM
To: Staff, CAO (PUC) <consumer.puc@state.mn.us>
Subject: PUC_MN.051921.001_I_F

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PUC Report

Report Number : MN.051921.001
Impacted Company : Lumen
Date and Time : 18-MAY-2021 01:51:00
TIMEZONE : CDT
For Questions Contact : Ted Hankins 318- 388-9416
Reason for Outage : Lumen was unable to deliver location information
Notification : (ANI/ALI) to some PSAPs in state due to vendor partner maintenance.
Cause of Outage : Under Investigation
Location of Outage : MINNEAPOLIS/MN,BISMARCK/ND,CASTLE ROCK/CO,NM
Exchange Name / Wire Center : MPLSMNDTDS7
Expected Duration : 18-MAY-2021 05:00:00
Actual Duration : 01:20:00
Number of Customers : 586148
Services Affected : 911 ANI/ALI
Agencies Notified : PSAPs
Significant Update :
Resolution : Vendor partner backed out of maintenance
Restore Date/Time : 18-MAY-2021 03:11:00

--Disclaimer--

From: Topp, Jason D
Sent: Tuesday, May 25, 2021 3:01 PM
To: Doyle, Greg (COMM)
Subject: Fwd: PUC_MN.052521.006_F

Greg

Here is a notice on another ALI issue that popped up today.

Get [Outlook for iOS](#)

From: Regulatory.NEMC@lumen.com <Regulatory.NEMC@lumen.com>
Sent: Tuesday, May 25, 2021 1:35:29 PM
To: Topp, Jason D <Jason.Topp@lumen.com>
Subject: PUC_MN.052521.006_F



PUC Report

Report Number : MN.052521.006
Impacted Company : Lumen
Date and Time : 25-MAY-2021 10:42:25
TIMEZONE : CDT
For Questions Contact : Ted Hankins 318- 388-9416
Reason for Outage : Lumen failed to deliver 911 location Information
Notification : (ANI/ALI) to PSAP(s).
Cause of Outage : Router functionality
Location of Outage : ALBERT LEA/MN
Exchange Name / Wire Center : ALLEMNALDS0
Expected Duration : 25-MAY-2021 17:00:00
Actual Duration : 02:02:35
Number of Customers : 10,235
Services Affected : 911 ANI/ALI
Agencies Notified : PSAP
Significant Update :
Resolution : A network device was successfully rebooted, thus restoring all services to a stable state.
Restore Date/Time : 25-MAY-2021 12:45:00

From: Topp, Jason D
Sent: Thursday, June 4, 2020 9:09 PM
To: Doyle, Greg (COMM); Rebholz, Michelle (PUC)
Subject: Fiber Cut Owatonna

A fiber cut near Owatonna is affecting 911. It appears that most locations have lost diversity but that Nicollet 911 calls are routing to a nearby PSAP. I will let you know once I get clarification.

Get [Outlook for iOS](#)

OAG No. 021

State of Minnesota
Office of the Attorney General
Utility Information Request

In the Matter of 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) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Kristin Berkland
Telephone: (651) 757-1236

Date of Request: May 26, 2021
Due Date: June 8, 2021

Reference: Minn. R. 7810.3300 (Maintenance of Plant and Equipment); 7810.5500 (Transmission Requirements)

Provide current photos of the plant at the addresses below. If the plant is in a state of deterioration or disrepair, explain when and how the plant was damaged, and why it has not been repaired as of the date of this IR.

Address

1. 2010 Silver Lake Rd., New Brighton
2. 1975 Long Lake Rd., New Brighton
3. 1748 Long Lake Rd., New Brighton
4. 1355 Long Lake Rd., New Brighton
5. Mount Airy 1 (GPS: Lat.44;57;33.74, Long. 93;5;37.61)
6. Mount Airy 2 (GPS: Lat. 44;57;34.72, Long.93;5;37.03)
7. Mount Airy 3 (GPS: Lat. 44;57;34.99, Long. 93;5;49.12)
8. Mount Airy 4 (GPS: Lat. 44;57;35.69, Long. 93;5;43.76)
9. Mount Airy 5 (GPS: Lat. 44;57;35.75, Long. 93;5;43.68)
10. Intersection of S. Owasso and Rice, Little Canada
11. 966 McKnight Rd, S, Maplewood
12. 141st and Huntington
13. 1241 Theodore Wirth Parkway
14. 1535 Windsor La., Shakopee
15. 8600 Egan Dr, Savage
16. 2364 14th St., NW, New Brighton
17. 3502 Dight Ave. S, Mpls
18. 7559 Egan, Savage
19. 7704 4th St., Richfield
20. 8106 Dakota, Chanhassen
21. 8489 Moraine Cir. Shakopee

- 22. 13031 Ottawa Dr., Savage
- 23. 13223 Webster Ave, Savage
- 24. James Ave. and 139th St. W, Burnsville
- 25. 13428 Uptown Ave. S, Burnsville
- 26. Intersection of McAndrews Rd. and Burnhaven Dr., Burnsville
- 27. Intersection Spiral View Loop Rd. and Hastings Rd. S, Hastings
- 28. 1200 Co. Rd. 42 Burnsville
- 29. 7275 147th W Street, Apple Valley
- Intersection 147th St. W and Garrett Ave, Apple Valley

Response:

CenturyLink objects to this request as over broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, CenturyLink responds as follows:

CenturyLink has thousands of pedestals in Minnesota. A certain percentage of those pedestals need repair each year due to age, weather, vehicle damage, snowplow activity, vandalism and other miscellaneous causes. We depend on our technicians to identify pedestals in need of repair and have a reporting process in place for situations in which technicians notice damage that needs to be addressed. Yet, according to our records, with one exception, no technician has reported these issues to CenturyLink. Instead, they appear to have submitted them to the OAG and the DOC as a part of this investigation. Such an approach is contrary to the technician's obligations to the company and, more importantly, does not allow CenturyLink to repair the issue.

As a result, CenturyLink had to hire a special contractor to spend three days traveling to these locations, review whether an issue existed and arrange for repair where necessary.

Attachment 21A gives a description of the state of the facilities. All of these facilities have either been repaired or assigned to a technician for repair. CenturyLink will gather pictures of the repaired facilities and supplement this response.

CenturyLink
Docket No. P-421/C-20-432
June 9, 2021
Public Attachment 21A

[Not Public Data Begins



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OAG No. 025

State of Minnesota
Office of the Attorney General
Utility Information Request

In the Matter of 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) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Kristin Berkland
Telephone: (651) 757-1236

Date of Request: May 26, 2021
Due Date: June 8, 2021

Reference: OAG IR No. 016; CenturyLink's October 13, 2020 response.

[TRADE SECRET DATA BEGINS ...

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Response:

See Not Public Attachment 25 for an updated performance chart.

Minn. R. 7810.5800 does not specify a methodology for calculating out of service in 24 hours. Instead, it requires "Each telephone utility shall make all reasonable efforts to prevent interruptions of service. When interruptions occur, the utility shall reestablish service with the shortest possible delay. The minimum objective should be to clear 95 percent of all out-of-service troubles within 24 hours of the time such troubles are reported."

The methodology for calculating out of service in 24 hours in its Alternative Form of Regulation Plan is a straightforward application of this rule approved by the Commission and therefore provides an appropriate framework for calculating performance.

Response by _____
Title _____
Department _____
Telephone _____

**Attachments
19, 25 and 26**

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In Their Entirety**

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OAG No. 026

**State of Minnesota
Office of the Attorney General
Utility Information Request**

In the Matter of 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) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Kristin Berkland
Telephone: (651) 757-1236

Date of Request: May 26, 2021
Due Date: June 8, 2021

Reference: OAG IR No. 007; CenturyLink's October 13, 2020 response, Attachment 7 at 6-17.

[TRADE SECRET DATA BEGINS ...

.. TRADE SECRET DATA ENDS]

Response:

See Not Public Attachment 26.

Response by _____
Title _____
Department _____
Telephone _____

Attachments 19, 25 and 26

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In Their Entirety**

OAG No. 029

**State of Minnesota
Office of the Attorney General
Utility Information Request**

In the Matter of 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) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Kristin Berkland
Telephone: (651) 757-1236

Date of Request: May 26, 2021
Due Date: June 8, 2021

Reference: CenturyLink Response to DOC IR Nos. 4 and 13.

Provide a narrative response that explains:

- a) How CenturyLink's existing maintenance program complies with Minn. Rule 7810.3300; and
- b) How CenturyLink analyzes patterns in received trouble tickets to identify problematic areas and prioritize the targeting of repair and maintenance resources.

Response:

A) Minn. R. 7810.3300 states:

Each telephone utility shall adopt and pursue a maintenance program aimed at achieving efficient operation of its system so as to permit the rendering of safe and adequate service. Maintenance shall include keeping all plant and equipment in good state of repair consistent with safety and adequate service performance. Broken, damaged, or deteriorated parts which are no longer serviceable shall be repaired or replaced. Adjustable apparatus and equipment shall be readjusted as necessary when found by preventive routines or fault location tests to be in unsatisfactory operating condition. Electrical faults, such as leakage or poor insulation, noise, induction, cross talk, or poor transmission characteristics, shall be corrected to the extent practicable within the design capability of the plant affected.

CenturyLink's trouble report rates demonstrate that it has an effective maintenance program in place for keeping its plant in good order. That program includes investing to upgrade

Response by _____
Title _____
Department _____
Telephone _____

company plant such as moving to fiber optics as a more reliable infrastructure than copper, responding to repair tickets and identifying areas for proactive projects as described in response to Request 28.

Many of the electrical faults identified in this rule such as “leakage or poor insulation, noise, induction, cross talk, or poor transmission characteristics” are in many ways relics due to improvements made over the years to the network.

b) See Not Public Attachment 29 which explains how CenturyLink prioritizes projects labelled as transformation projects. Additional materials were provided as attachments in response to the DOC information request 4.

Response by _____
Title _____
Department _____
Telephone _____