

## **OAG EXHIBIT C**

### **CENTURYLINK RESPONSES TO DEPARTMENT IRs**

PUBLIC DOCUMENT -  
NOT PUBLIC DATA HAS BEEN EXCISED  
**Minnesota Department of Commerce**  
**85 7<sup>th</sup> Place East / Suite 280 / St. Paul, MN 55101**  
**Information Request**

**Docket Number:** P-421/C-20-432

☐ Nonpublic ☒ Public

Date of Request: 01/06/2020

Response Due: 01/19/2020

**Requested From:** Jason Topp  
Qwest Corporation dba CenturyLink

**Type of Inquiry:** General

**SEND RESPONSE VIA EMAIL TO:** [Utility.Discovery@state.mn.us](mailto:Utility.Discovery@state.mn.us) as well as the assigned analyst(s).

**Assigned Analyst(s):** Joy Gullikson; Lisa Gonzalez

**Email Address(es):** [joy.gullikson@state.mn.us](mailto:joy.gullikson@state.mn.us); [lisa.gonzalez@state.mn.us](mailto:lisa.gonzalez@state.mn.us);

**Phone Number(s):** 651-539-1877; 651-539-1880

**ADDITIONAL INSTRUCTIONS:**

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**Request Number:** 3

**Topic:** Click or tap here to enter text.

**Reference(s):** Click or tap here to enter text.

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**Background:**

Minn. Rule 7810.2800 Delay in Initial Service or Upgrade states:

During such periods of time as telephone utilities may not be able to supply initial telephone service to an applicant or upgrade existing customers within 30 days after the day applicant desires services, the telephone utility shall keep a record by exchanges showing the name and address of each applicant for service, the date of application, date service desired, the class and grade of service applied for, together with the reason for the inability to provide the new service or higher grade to the applicant . . . Ninety percent of the utility's commitments to customers as to the date of installation of regular service orders shall be met excepting customer-caused delays and acts of God.

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**Request:**

1. For January 1, 2019 to present, please provide a copy of the log of applications for telephone service where CenturyLink was unable to provide service within 30 days, arranged by exchanges and by month. For each entry:
  - a. Please also provide the date the service was desired
  - b. The date when CenturyLink established the landline telephone service and other services
  - c. A reason for the delay, in particular, note any effects of the COVID-19 virus on the ability of technicians to access residences.

**Response:**

CenturyLink has requested this data be pulled from our systems and will provide the date the customer requested service, the original due date, the date service was established, and the reasons provided for each delay.

**Supplemental Response 3/12/21:**

See Not Public Attachment 3A.

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- 
2. If CenturyLink's rate of honoring commitment to customers does not meet the required ninety percent in any given exchange, indicate the percentage of commitments honored and explain why that percentage was not ninety percent.

**Response:**

To the extent this question asserts that Minn. R. 7810.2800 requires that a provider meet a 90% commitment rate applies on a per month per exchange basis, CenturyLink objects to this request. The rule imposes no such standard. Notwithstanding and without waiving this objection, CenturyLink has requested this data and will supplement this response.

**Supplemental Response 1/25/2021:**

To the extent this question asserts that Minn. R. 7810.2800 requires that a provider meet a 90% commitment rate applies on a per month per exchange basis, CenturyLink objects to this request. The rule imposes no such standard. Notwithstanding and without waiving this objection, CenturyLink has met the 90% statewide standard in 2019 and 2020. See Not Public Attachment 3, Tab 1 data for service within three days.

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# **Attachment 3A**

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**Request Number:** 5

**Topic:** Click or tap here to enter text.

**Reference(s):** Click or tap here to enter text.

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**Background:**

Minn. Rule 7810.5900 Customer Trouble Reports states:

Arrangements shall be made to receive customer trouble reports 24 hours daily and to clear trouble of an emergency nature at all hours, consistent with the bona fide needs of the customer and personal safety of utility personnel.

Each telephone utility shall maintain an accurate record of trouble reports made by its customers. This record shall include appropriate identification of the customer or service affected, the time, date, and nature of the report, the action taken to clear trouble or satisfy the complaint, and the date and time of trouble clearance or other disposition. This record shall be available to the commission or its authorized representatives upon request at any time within the period prescribed for retention of such records.

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It shall be the objective to so maintain service that the average rate of all customer trouble reports in an exchange is no greater than 6.5 per 100 telephones per month. A customer trouble report rate of more than 8.0 per 100 telephones per month by repair bureau on a continuing basis indicates a need for investigative or corrective action.

**Request:**

In the response to OAG IR #9, CenturyLink did not provide all customer care records, but instead provided 25 randomly generated samples of customer trouble reports in NOT PUBLIC Attachment 9. Please provide the following:

1. If CenturyLink does not maintain an accurate record of trouble reports made by its customers, please identify what it does maintain for trouble reports. If CenturyLink does maintain an accurate record of trouble reports made by its customers, provide the following for each exchange for the calendar year 2020:
  - a. The trouble report index (number of trouble reports per 100 telephones)
  - b. The number of trouble reports
  - c. The cause of trouble
  - d. The date reported and the date trouble cleared

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- 
- e. The number of days between date reported and date cleared (if CenturyLink does not have this information available, express the dates in a manner that will allow the days between to be easily calculated)

**Response:**

CenturyLink supplemented its response to the OAG to include 500 records which was produced to the Department on December 15. If we were to provide all records, that would be over 25,000 records.

CenturyLink will provide data that calculates a trouble report rate in response to subparts a and b but the data we received for our response to this request was incomplete and we will need to supplement this response with complete data.

**Supplemental Response 1/25/2021:**

See Not Public Attachment 3, Tab 5.

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- 
2. Explain the difference between “Out of Service” and “Service Affecting”, as listed on the spreadsheet provided to OAG in response to OAG IR #9, Supplemental Response, Attachment 9-1 NOT PUBLIC.

**Response:**

Out of Service tickets are issued when the service trouble includes no dial tone or the noise on the line is to such an extent that communication is not possible.

Service Affecting tickets are issued when the customer can make calls but there might be noise on the line, can't receive calls (e.g., sometimes they have accidentally call forwarded their phone).

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**Request Number:** 7

**Topic:** Click or tap here to enter text.

**Reference(s):** Click or tap here to enter text.

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**Background:**

Minn. Rule 7810.5800 Interruptions of Service states:

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. In the event that service must be interrupted for purposes of working on the lines or equipment, the work shall be done at a time which will cause minimal inconvenience to customers. Each utility shall attempt to notify each affected customer in advance of the interruption. Emergency service shall be available, as required, for the duration of the interruption.

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**Request:**

1. Provide CenturyLink's monthly performance results by exchange for calendar year 2020.
2. What methodology does CenturyLink use to calculate the Company's clearance rate for out-of-service repairs for voice service of Minnesota customers?

**Response:**

1. CenturyLink will provide this data but the data we received for our response to this request was incomplete and we will need to supplement this response with complete data.
2. CenturyLink uses the Date/Time the customer called in to report a trouble and the Date/Time the service was restored to determine the time to restore service. Then, the percent of Out-of-Service troubles restored within 24 hours is calculated by taking those tickets restored within 24 hours divided by the number of Out-of-Service tickets.

**Supplemental Response 1/25/2021:**

See Not Public Attachment 3, Tab 7.

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# **Attachment 3**

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**Request Number:** 8

**Topic:** Click or tap here to enter text.

**Reference(s):** Click or tap here to enter text.

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**Background:**

Minn. R. 7810.5200 states:

Adequate forces shall be provided at local manual offices in order to assure that 95 percent of the calls will be answered within ten seconds. Ninety percent of repair service calls, calls to the business office, and other calls shall be answered within 20 seconds. *An "answer" shall mean that the operator or representative is ready to render assistance and/or ready to accept information necessary to process the call.* An acknowledgment that the customer is waiting on the line shall not constitute an answer. (emphasis added)

**Request:**

1. Please provide evidence that 95% of calls from customers in calendar year 2020 were answered in ten seconds. If the 95% standard was not met, provide the percent of calls that were answered within 10 seconds along with the documentation supporting that percentage.

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**Response:**

CenturyLink objects to this request. This standard applies to "local manual offices" which means calls that are connected manually in a local switch. CenturyLink does not use local manual offices.

2. Please provide evidence that 90% of repair calls, calls to the business office, and other calls, in calendar year 2020, were answered within 20 seconds. If the 90% standard was not met, provide the percent of calls that were answered within 20 seconds along with the documentation supporting that percentage.

**Response:**

The Commission and the Department of Commerce have long recognized the unreasonableness of the 20 second standard contained in this rule. In repeated Alternative Form of Regulation Service Quality Plans for Frontier, Citizens Telecommunications, Embarras and Qwest Corporation, the Department has agreed and the Commission has approved plans that set a 60 second standard which more closely aligns with modern practices. The most recent Qwest Corporation standard read:

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**7. Service Center Access** - Calls to the Service Center will be on hold no more than 60 seconds on the average after the last menu option is selected before being answered by a live service representative. The service representative will accept the information needed to begin processing the call and direct the caller to the appropriate specialized personnel, as appropriate. Compliance shall be determined by a 12-month annual statewide average of the performance for the measure for combined customer, business and repair calls.<sup>1</sup>

**[NOT PUBLIC DATA BEGINS]**

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<sup>1</sup> *Qwest Corporation Alternative Form of Regulation Plan*, Retail Service Quality Plan, p. 7, adopted in Commission Docket No. P-421/AR-09-790.

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**NOT PUBLIC DATA ENDS]**

3. Please explain CenturyLink's understanding of "ready to render assistance and/or obtain information."

**Response:**

CenturyLink's understanding of "ready to render assistance and/or obtain information" is when the telephone set of the live representative has been connected to the customer, or potential customer, and is ready to assist the calling party.

4. Please explain how CenturyLink monitors customers who are put on hold at some point during the call.

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**Response:**

Customer Care agents are focused on billing, payments and upgrades. Repair agents are skilled in technical troubleshooting. Where appropriate, we have provided separate responses for Care and Repair agents.

*Repair:*

Our leaders and supervisors utilize reports that show details at a channel, supervisor, agent and individual call level that have specifics regarding number of holds and hold times.

In addition, appropriate holds and hold times are part of a supervisor's call scanning process where individual coaching/feedback are provided to agents on specific contacts.

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**Docket Number:** P-421/C-20-432

☐ Nonpublic ☒ Public

Date of Request: 2/9/2021

Response Due: 2/19/2021

**Requested From:** Jason Topp  
Qwest Corporation dba CenturyLink

**Type of Inquiry:** General

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5. Please provide customer service training and reference material that address wait times and procedures that address the process of placing customers on hold.

**Response:**

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**Request Number:** 9

Topic: Click or tap here to enter text.

Reference(s): Click or tap here to enter text.

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**Background:**

Minn. R. 7810.5200 states:

Adequate forces shall be provided at local manual offices in order to assure that 95 percent of the calls will be answered within ten seconds. Ninety percent of repair service calls, calls to the business office, and other calls shall be answered within 20 seconds. *An "answer" shall mean that the operator or representative is ready to render assistance and/or ready to accept information necessary to process the call.* An acknowledgment that the customer is waiting on the line shall not constitute an answer. (emphasis added)

**Request:**

According to training or reference material for Customer Service Representatives:

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- 
1. Is there a cumulative maximum length of time a customer may be left on hold?
    - a. If so, how what is that time?

**Response:**

**[NOT PUBLIC DATA BEGINS**

**NOT PUBLIC DATA ENDS]**

2. How does CenturyLink monitor the time a customer is on hold?

**Response:**

**[NOT PUBLIC DATA BEGINS**

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3. Is there a maximum allowable number of times a customer can be transferred from one customer service representative to a different representative?

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**NOT PUBLIC DATA ENDS]**

- a. What are the reasons why a customer is transferred from the first customer service representative who takes the call to a subsequent customer service representative?

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**Response:**

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4. When a customer is transferred to a different customer service representative, is that customer always placed at the end of the subsequent customer service representative's queue?
  - a. If the answer to 4. is yes, are there exceptions? What are they?
  - b. If the answer to 4. is no, what are the reasons for placing the customer at the end of the queue?

**Response:**

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**Request Number:** 19

**Topic:** Click or tap here to enter text.

**Reference(s):** Click or tap here to enter text.

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**Background:**

Minn. Rule 7810.1200 Record of Complaint states:

Each utility shall keep a record of all complaints received by it from its customers which shall be classified as directed by the Public Utilities Commission. The record shall show the name and address of the customer, the date and nature of the complaint, and its disposition and date thereof. The utility shall keep records of the customer complaints in such a manner as will enable it to review and analyze its procedures and actions.

**Request:**

1. How does CenturyLink define "complaint" for purposes of Minn. Rule 7810.1200?

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**Response:**

CenturyLink and the Department filed comments on this definition in Docket No. P-421/CI-17-796. CenturyLink provided its position at that time:

CenturyLink suggests that the Commission review the definition of complaint in light of its stated purpose which is to allow the company to "to review and analyze its procedures and actions." This purpose suggests that the Company should have the flexibility to define the term and Commission review of company compliance should focus on whether it retains adequate records to analyze its procedures and actions. CenturyLink is confident that its records are adequate for that purpose. CenturyLink has records on each of the complaints at issue and has individual customer records in place to the extent additional information is needed.

This suggested approach not only squares with the language in the rule, but also makes sense for the Commission. If the Commission were to mandate a broad definition of the term "complaint" such as the one suggested by the Department, it would impose a very burdensome regulatory requirement without any demonstrated corresponding benefit. If the Commission were to make such a change — a rule-making proceeding would be a more appropriate place for such an action. However, history demonstrates the limited value and the extensive burden associated with a broad definition of the term "complaint." In 2008, the Department and Embarq entered into a stipulation setting forth a broad definition of the term to resolve a dispute related to

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Embarq's Alternative Form of Regulation Plan.' As a result of that settlement, Embarq agreed to implement an electronic complaint tracking tool that recorded all Minnesota complaints received in call centers and were escalated to a first level supervisor.<sup>3</sup> Embarq created the tool and dealt with compliance over the course of its AFOR. As far as the company is aware, this additional tracking provided no help to the company in analyzing its processes and procedures.

The data did not appear to be used for any purpose by regulators. If the Commission were to adopt the proposed definition suggested by the Department or even the less restrictive definition agreed to by Embarq, it would impose a tremendous burden on Minnesota providers without any demonstrated benefit. The Commission should decline to specifically define the term and simply mandate that Companies maintain adequate records so that they can analyze their procedures and actions.

The Department argued for a broad interpretation of the term in comments filed on June 26, 2018. In response, the Commission directed CenturyLink to file complaints, inquiries and expressions of interest related to the Minnesota Telephone Assistance Plan. CenturyLink did so for six consecutive quarters. Neither the Commission nor the Department filed an objection to CenturyLink's classifications.

CenturyLink continues to adhere to its proposed definition of the term Complaint, but it also maintains customer care records that reflect every interaction with its customers.

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2. If a call is made directly to CenturyLink by a customer, where the customer has a problem with their service and is seeking relief, and not via a government agency, does CenturyLink consider this a complaint as it pertains to the requirements in Minn. Rules with respect to the treatment of complaints?

**Response:**

No. See response to subpart 1.

3. Does CenturyLink retain records of complaints it receives directly from customers, or does CenturyLink limit the retention of records to only those complaints that it receives via a government agency?

**Response:**

See response to subpart 1.

4. How long are records of complaints retained?

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**Response:**

Complaint data is stored for a minimum of seven years.

5. What is the process CenturyLink uses to analyze its procedures and actions from the complaints it receives?

**Response:**

The Customer Advocacy Group has detailed reporting of complaints and frequently analyzes this data for root cause identification and resolution. Additionally, the Customer Advocacy Group's leaders meet regularly with Mass Markets and Service Delivery Executives, among others, to review complaint trends and resolution progress.

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**Requested From:** Jason Topp  
Qwest Corporation dba CenturyLink

**Type of Inquiry:** General

**SEND RESPONSE VIA EMAIL TO:** [Utility.Discovery@state.mn.us](mailto:Utility.Discovery@state.mn.us) as well as the assigned analyst(s).

**Assigned Analyst(s):** Joy Gullikson; Lisa Gonzalez

**Email Address(es):** [joy.gullikson@state.mn.us](mailto:joy.gullikson@state.mn.us); [lisa.gonzalez@state.mn.us](mailto:lisa.gonzalez@state.mn.us);

**Phone Number(s):** 651-539-1877; 651-539-1880

**ADDITIONAL INSTRUCTIONS:**

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

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6. In addition to retaining audio recordings of telephone calls from customers speaking with Customer Care Agents and Repair Agents, what steps does CenturyLink take to comply with Minn. Rule 7810.1200? If CenturyLink does not retain such audio recordings, please indicate that is the case.

**Response:**

CenturyLink maintains call recordings for the required two years. Each complaint is also logged in Salesforce which the Customer Advocacy Group uses to manage the complaint resolution process, as well as analyze procedures and actions.

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To be completed by responder

Response Date:

Response by:

Email Address:

Phone Number: