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August 16, 2022

VIA EDOCKETS

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: *In re Formal Compl. Regarding the Servs. Provided by the Qwest Corp. on Behalf of the Commc'ns Workers of America*
Docket No. P-421/C-20-432

Dear Mr. Seuffert:

The Minnesota Department of Commerce, the Communications Workers of America, the Office of the Attorney General—Residential Utilities Division (collectively, “Intervenors”), and CenturyLink have engaged in settlement discussions during the past eight months to try to resolve concerns raised in this proceeding. To date, no resolution has been reached. Although the Intervenors appreciate the efforts all parties have put into the settlement process thus far, the Intervenors have concerns with the pace and scope of the discussion and believe other action may be appropriate.

In addition to these settlement-related issues, the Intervenors are concerned that consumers may be experiencing problems with CenturyLink’s service that are beyond the scope of the originally filed complaint. To create a record reflective of the problems being experienced by consumers, the Intervenors request that the Minnesota Public Utilities Commission (“Commission”) refer this matter to the Office of Administrative Hearings (“OAH”) for a series of public hearings, similar to the Commission’s approach in Docket No. 18-122 concerning Frontier Communications.¹ The purpose of these hearings would be to solicit comments from CenturyLink consumers, local officials, and other stakeholders regarding the nature, extent, and causes of service quality deficiencies that they have experienced.

The Intervenors also request that the scope of the proceeding be expanded to include both previously raised issues and any new service quality issues identified through the hearing process. The Intervenors believe that public hearings will help develop a more complete record and ensure

¹ *In re Comm’n Inquiry into the Serv. Quality, Customer Serv., & Billing Practices of Frontier Commc’ns*, Docket No. P-407, 405/CI-18-122, ORDER INITIATING INVESTIGATION & REFERRING MATTER FOR PUBLIC HEARINGS (Apr. 26, 2018) (eDocket No. 20184-142397-01).

that CenturyLink's Minnesota consumers have an opportunity to share their concerns. In terms of hearing logistics, the Intervenor recommend:

- The Commission order no less than six hearings in areas throughout the state to ensure that the bulk of CenturyLink consumers will have a fair opportunity to participate.
- The Commission order CenturyLink to publicize these meetings by including a notice in its customer bills, sending a notice to governing bodies within its service area, and publishing notices in legal newspapers and newspapers of general circulation. Each type of notice should be designed to alert people about the public meetings at least ten days before the first meeting occurs. The notices should be efiled in advance to give the parties an opportunity to provide input, prior to the Commission's Executive Secretary approving the notice.
- The Commission request that an Administrative Law Judge be assigned by OAH to organize and preside over the public hearings, to develop a record and written transcripts, and to provide a written summary of what transpires and other observations that the ALJ believes the Commission would find helpful.

Following completion of the public hearing process, the Commission and other interested parties would then be in a better position to consider appropriate next steps and possible remedies.

Thank you for your attention to this matter.

Sincerely,

s/ Richard Dornfeld

RICHARD DORNFELD

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Attorney for Minnesota Department of Commerce

Mr. Will Seuffert
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s/ Kristin Berkland

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*Attorney for Office of Minnesota Attorney
General—Residential Utilities Division*

s/ Stanley M. Gosch

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*Attorney for Communications Workers of America,
District*

cc: Service List

AFFIDAVIT OF SERVICE

Re: *In re Formal Compl. Regarding the Servs. Provided by the Qwest Corp. on Behalf of the Commc'ns Workers of America*
Docket No. P-421/C-20-432

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, Liz Soderstrom, hereby state that on August 16, 2022, I filed by electronic eDockets the attached **Letter** and eServed or sent by US Mail, as noted, to all parties on the attached service list.

See attached service list.

/s/ Liz Soderstrom
LIZ SODERSTROM

Subscribed and sworn to before me
on August 16, 2022.

/s/ Brenda J. Hanson
Notary Public – Minnesota
My Commissioner Expires on January 31, 2025

SERVICE LIST
In re Formal Compl. Regarding the Servs. Provided by the Qwest Corp.
on Behalf of the Commc'ns Workers of America
Docket No. P-421/C-20-432

Patricia	Beety	pbeety@lmc.org	League of Minnesota Cities	145 University Ave W Saint Paul, MN 55103	Electronic Service	No
Gary	Carlson	gcarlson@lmc.org	League Of Minnesota Cities	145 University Avenue West St. Paul, MN 55103	Electronic Service	No
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No
Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes
Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No
Jeff S	Lacher	jlacher@cwa-union.org	Communications Workers of America	7600 Parklawn Ave Ste 412 Minneapolis, MN 55435	Electronic Service	No
Susan L.	Naughton	snaughton@lmc.org	League Of Minnesota Cities	145 University Avenue West St. Paul, MN 551032044	Electronic Service	No
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota	Electronic Service	Yes

				St St. Paul, MN 551012131		
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No