



Jason D. Topp
Assistant General Counsel
(651) 312-5364

August 24, 2022

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

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

Dear Mr. Seuffert:

CenturyLink submits this letter in response to the request for public hearings filed by the Minnesota Department of Commerce, the Communications Workers of America, the Office of the Attorney General—Residential Utilities Division (collectively, “Intervenors”) on August 16, 2022.

While this proceeding concerning copper-based voice services is pending, CenturyLink’s parent, Lumen Technologies, Inc., is making historic investments in its Minnesota Network and building on its more than 18,000 fiber route miles statewide. It is provisioning fiber to significant swaths of Minnesota and offering innovative products and services that will allow Minnesota consumers and businesses to take advantage of the latest technical innovations in the country.

This deployment of fiber is consistent with the state of Minnesota’s desire to increase broadband access and available broadband speeds. Any resolution of disputes related to copper voice service should recognize the tremendous investment necessary to advance Minnesota broadband goals and be designed to protect voice consumers while accommodating the necessary transition of landline networks to meet Minnesota’s digital needs. Such an approach fits the goals set forth in statute for telecommunications service in Minn. Stat. § 237.011 (fostering the deployment of advanced networks) and its goals for broadband service in Minn. Stat. § 237.012 (goal of becoming a leader in broadband availability and speed).

200 South 5th Street, Suite 2200
Minneapolis, MN 55402

www.centurylink.com

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Instead, Intervenor request a series of public hearings with an unclear and undefined scope of topics. As a basis for their request, the Intervenor express concern about the pace and scope of settlement negotiations. Public hearings seem likely to slow down, rather than speed up, resolution of this docket.

Since the inception of this matter, CenturyLink has communicated its desire to amicably resolve the Intervenor's concerns without delay. CenturyLink respectfully represents that it has worked to advance the negotiations as expeditiously as possible given the scope and complexity of the issues involved. Indeed, CenturyLink extended its initial settlement proposal in January and waited until June for any response. CenturyLink continues to believe all parties will be best served by continued discussions and remains interested and available to resolve this matter, regardless of how the Commission chooses to proceed.

Should the Commission wish to advance the current docket, the proceedings must be based on a proper process, including a complaint that satisfies Commission requirements, evidence that is admissible and a proceeding consistent with the parties' due process rights and applicable rules. Public hearings of the nature suggested by the Intervenor would meet none of those requirements.

If the Commission chooses to proceed with public hearings, the scope of those public hearings must be limited to regulated telecommunications services over which the Commission has jurisdiction. Moreover, comments should be limited in time to a period consistent with the allegations in any complaint filed and focus on alleged violations of Minnesota Rules relating to voice services. Hearings without such a defined scope and structure would not only waste scarce Commission resources but would not advance the resolution of those issues over which the Commission has jurisdiction.

CenturyLink thanks the Commission for its attention to this matter and looks forward to continued dialog with the Intervenor and the Commission.

Very truly yours,

/s/ Jason D. Topp

JDT/bardm

cc: Service List

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

Katie Sieben	Chair
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

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CERTIFICATE OF SERVICE

Dianne Barthel hereby certifies that on the 24th day of August, 2022, she e-filed a true and correct copy of the annexed filing by posting it on www.edockets.state.mn.us. Said document was also served on the service list via e-mail as designated with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel
Dianne Barthel

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Patricia	Beety	pbeety@lmc.org	League of Minnesota Cities	145 University Ave W Saint Paul, MN 55103	Electronic Service	No	OFF_SL_20-432_Official Service List
Gary	Carlson	gcarlson@lmc.org	League Of Minnesota Cities	145 University Avenue West St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-432_Official Service List
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_20-432_Official Service List
Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_20-432_Official Service List
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-432_Official Service List
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	OFF_SL_20-432_Official Service List
Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-432_Official Service List
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_20-432_Official Service List
Jeff S	Lacher	jlacher@cwa-union.org	Communications Workers of America	7600 Parklawn Ave Ste 412 Minneapolis, MN 55435	Electronic Service	No	OFF_SL_20-432_Official Service List
Susan L.	Naughton	snaughton@lmc.org	League Of Minnesota Cities	145 University Avenue West St. Paul, MN 551032044	Electronic Service	No	OFF_SL_20-432_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-432_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-432_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-432_Official Service List
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-432_Official Service List