From:
 Savannah Sepic

 To:
 Staff, CAO (PUC)

 Subject:
 Comment on Docket P-421/M-21-381

 Date:
 Monday, June 28, 2021 1:03:16 PM

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The Minnesota Retailers Association would like to submit these comments below for the record on docket P-421/M-21-381 (Minnesota Telecom Rules):

CenturyLink's petition to eliminate or modify Minn. Rules 7810.5200 (Answer Times) and 7810.5800 (Interruptions of Service) are likely to create negative results for Minnesota consumers and retailers. These rules ensure that landline telephone service, and the infrastructure that supports it, are properly maintained and that any issues are fixed promptly.

Many individuals and companies in Minnesota continue to use landline telephone service for communication, especially in rural areas where alternatives are limited. These services are also still leveraged for emergency and fire purposes in business operations, where they remain the best option despite the existence of alternatives.

The elimination or reduction of these rules may negatively impact the service quality of CenturyLink's data services (e.g. DSL, T1 lines) as well. Rule 7810.5800 does not appear specific to voice traffic, and the copper wire infrastructure which carries landline voice traffic also carries data traffic. Deployment of such DSL and T1 services remains common among both consumers and businesses.

Please let me know if you need anything else for me or that you received these comments! Thank you so much and have a wonderful day.

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