

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

In the Matter of the Complaint filed by George W.
and Carol A. Ferebee, Hill City, South Dakota,
against CenturyLink Regarding a Telephone
Service Dispute

Docket No. CT14-001

**QWEST CORPORATION DBA CENTURYLINK QC'S AMENDED ANSWER
TO THE COMPLAINT OF GEORGE W. AND CAROL A. FEREBEE**

CenturyLink submits this amended answer to the complaint filed by George W. and Carol A. Ferebee related to telephone service provided to them at 11495 Gillette Prairie Road in Hill City, South Dakota. CenturyLink acknowledges that issues have existed with their service and has made extensive efforts to address them. CenturyLink has successfully addressed a similar situation in New Mexico and has brought in the employees responsible for addressing that situation to determine if a similar solution is available to address the issues Mr. and Mrs. Ferebee have experienced. Those employees have recommended several additional measures both with respect to the plant in the field and the central office that serve the Ferebees. CenturyLink has committed to take those recommended actions by the end of the year at an estimated cost of approximately \$50,000 and believes that those actions will significantly reduce or eliminate the problems that these customers have been experiencing.

Mr. and Mrs. Ferebee live in a remote area with a unique geological structure and weather conditions that have hampered the quality of their service. The ground around the Ferebee's home contains a large quantity of metal, making it especially vulnerable to lightning strikes. The area surrounding their home contains a large proportion of forest

service land which dramatically restricts the available options for improving the network that serves them.

Nonetheless, CenturyLink has made extensive efforts to address those issues.

- In the spring of 2012, CenturyLink assigned a single technician in charge of the Ferebees' service so that the technician would know the history associated with their service. CenturyLink reviewed the cable pairs and repeater spacing to ensure that these components were best set up to provide them with service. CenturyLink made changes to repeater spacing and changed technology associated with those repeaters from straight through repeaters to add/drop repeaters. Add/drop repeaters rebuild and reframe data and improve the circuit that ultimately provides service to the home.
- These changes appeared to improve service but after a few months, CenturyLink received a complaint that the service would go out when the Ferebees' power went out. After investigating the issue, CenturyLink replaced the entire power unit used to provide service to the Ferebees in 2012.
- These changes appear to have addressed concerns for a period of about six months. The most recent issues experienced by the Ferebees coincided with several lightning storms in the spring and summer of 2014. Most recently, after a tech tested the grounding and bonding of the system, CenturyLink found a grounding issue at the powered repeater and found a poor connection and fixed it on the spot.
- CenturyLink has tested the grounding at each repeater location (with the exception of one location where CenturyLink has not been able to get access over private property), and the tests have shown adequate grounding.¹

On November 3, 2014, a CenturyLink specialist visited the area to identify what additional measures could be taken. The specialist tested CenturyLink's repeaters in five of six available areas and audited the central office to determine if additional measures could be taken there.² The specialist determined that grounding issues existed at each repeater location with readings above specifications. The specialist also identified grounding issues

¹ Based on subsequent tests described below, it appears these tests created erroneous results.

² In the sixth location, CenturyLink was unable to access its repeater due to a locked gate and no trespassing signs placed by the landowner. CenturyLink is in the process of seeking access to those facilities.

at the central office. The specialist recommended that the company take steps to address issues in the field and in the central office:

Field Recommendation

- Due to the area's rocky soil, the specialist recommends a unique approach to grounding repeaters, the ground field should consist of a 40 foot linear trench 40" deep. Using LOW OHMS CONCRETE (6 bags per Repeater) and # 2 solid tined copper conductor.
- Once the ground field updates are complete, employ the High Voltage Protection plan utilized to resolve a similar issue in New Mexico.
- Replace repeater batteries.

Central Office (CO)

- Install a new 2/0 ground cable from Cable Entrance Ground Bar to the OPGP Bar (Central Office Ground Bar).

CenturyLink has committed to perform the recommended work and will complete it by the end of the year. CenturyLink estimates that these efforts will cost approximately \$50,000.

With respect to the specific matters identified in the complaint, CenturyLink responds as follows:

1. CenturyLink admits the allegations in paragraphs 1 and 2 although it notes that its proper company name is Qwest Corporation dba CenturyLink QC.
2. With respect to the allegations in paragraph 3, CenturyLink admits that service issues have arisen with respect to the Ferebees' service address and has provided a general description of the efforts it has undertaken to address them in this response.

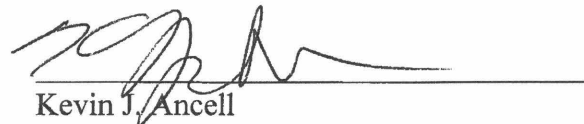
3. With respect to the allegations in paragraph 4, CenturyLink acknowledges that the Ferebees' service has had service issues and promises to endeavor to address them as set forth in this response.

4. CenturyLink does not believe a response is needed to the allegations in paragraphs 5, 6 and 7 but will serve this response to the email address identified in the complaint.

CenturyLink respectfully requests that the Commission allow it to implement the recommended modifications to its network to address the issues experienced in this matter. CenturyLink suggests that the current hearing should be delayed until the customers have the opportunity to determine whether or not these measures are adequate to address their concerns.

Dated this 18th day of November, 2014.

QWEST CORPORATION DBA
CENTURYLINK QC



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