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March 27, 2014

Mr. Eric Paulson
Analyst
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

**Re: In the Matter of Qwest Corporation dba CenturyLink QC's Petition for
Approval of Revisions to its Performance Assurance Plan
Docket No. TC13-111**

Dear Mr. Paulson:

This letter responds to concerns you have expressed regarding CenturyLink's reporting of South Dakota Performance Assurance Plan (PAP) individual CLEC data reflecting services provided to CLEC customers in the month of January. Under the revised PAP, CenturyLink is providing reports of its performance in providing service to individual CLECs for the first time in South Dakota. Before this time, CenturyLink filed aggregate reports with the Commission.

CenturyLink understands the terms of the PAP to require reporting of January performance by the end of March (with a five day grace period). It bases this view on the language of the PAP as well as the fact that performance associated with January services is not completed until the end of the following month.

The reporting provisions of the revised PAP state as follows:

12.1 CenturyLink QC will provide the Commission and CLECs opting into the PAP with a monthly report of CenturyLink QC's performance for the payment-eligible PIDs. . . .

12.2 On or before the last business day of each month *following the relevant performance or payment period*, CenturyLink QC shall post the individual CLEC monthly performance (for payment-eligible and diagnostic PIDs) and payment reports (for payment-eligible PIDs) to a secure part of the PAP website and the aggregate state performance and payment reports to the public part of the PAP website. In

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addition, CenturyLink QC must officially file with the Commission, one electronic copy in an Excel format, of all CLEC individual monthly reports under seal and one electronic copy in an Excel format of the state aggregate report in the public file. If CLEC requests hard copies of its individual reports, CenturyLink QC should make those hard copies available at no cost to CLEC. (emphasis added)

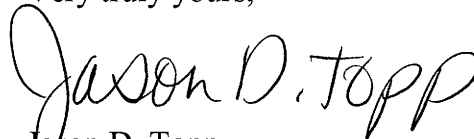
For two of the payment eligible measurements, performance is not complete until 30 days after CenturyLink provides service. Measurement OP-5 measures new service installation quality and measures installations free of CLEC/customer initiated trouble reports during the installation process and within 30 days following installation. Measurement MR-7 relates to repair performance and measures the number of repeated trouble reports for the same line/circuit within 30 calendar days.


For both of these measurements, it is not possible to calculate performance until 30 days after service is provided. Thus, for an installation performed on January 29, we cannot determine whether or not we have successfully installed the service until February 28.

In order to provide the Commission with one report that demonstrates the company's overall performance in the month of January, we need to wait until the 30 day time period associated with these measurements has passed. Therefore, under Section 12.2, reporting for services provided in the month of January is not due until the end of the month of March. In the next few months, we will be working to reduce the time to finalize and validate the reports in order to deliver them prior to the end of the month. We are planning to file the individual CLEC reports for January this week.

Please contact me if you have further questions or need more information.

Very truly yours,


Jason D. Topp


JDT/bardm