



**Jason D. Topp**  
Assistant General Counsel  
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October 25, 2023

Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
500 East Capital Avenue  
Pierre, SD 57501

Re: In the Matter of Qwest Corporation dba CenturyLink QC's Request for Certification regarding its Use of Federal Universal Service Support (Study Area: 395145)  
Docket No. TC23-035

Dear Ms. Van Gerpen:

At the October 10 Commission meeting, Chair Fiegen asked for additional information about locate issues in South Dakota. CenturyLink is somewhat surprised that the Commission has received negative feedback about locate performance this year. While fiber overbuilds and construction projects make locating more difficult than it has in the past, CenturyLink has not received significant feedback about issues in South Dakota in 2023. We also have not received any official complaints from the One Call Board.

### **Monthly Meetings**

Each month, CenturyLink meets with USIC to review its performance. We look at its on-time completion percentage (completing necessary markings), on time response percentage (responding to a ticket in a timely fashion including situations where a mark is not needed), ticket volume compared to the previous month and previous year, ask about USIC's current headcount and headcount plans as well as backlog and days in queue (DIQ). We also review any looming large projects that will require USIC to add extra resources.

Overall, USIC's on time completion percentage increased by 15% in 2023 compared to 2022. While that performance is not where CenturyLink would like to see it, USIC's improved performance is confirmed by a complete absence of complaints in the 2023 season.

CenturyLink's notes from the monthly meetings this year reflect the type of analysis we undertake each month and show the headcount challenges USIC faced, particularly early in the construction season. Despite these challenges, USIC added 6-10 additional locaters in 2023, although that number varied at individual points in time.

**USIC South Dakota Meeting Notes – August 2023**

**Meeting Date - 09/21/23**

Discussed OTP/OTC Performance Number for August. Ticket Volume increased up to 11,117K. OTR remained flat at 84.20% and OTC came up a little to 77.50%. OTC YoY performance numbers are still better than they were a year ago.

Mid America contract has ended in South Dakota.

57 folks right now painting and on the ground.

**South Dakota Meeting Notes – July 2023**

**Meeting date - 08/17/23**

Discussed OTR/OTC [**on time response/on time completion**] Performance Number for July. Ticket Volume decreased down to 8,846K. OTR dropped to 84.92% and OTC came up a little to 73.66%. OTC YoY performance numbers are still better than they were a year ago.

Have had some issues with Alliance in the Canton Area with them cutting our fiber on their project. The project has 1 mile left to do and then they are done. The other issue has just been that we have not been on the ticket so USIC has had to call Sadie to get us added to the ticket.

USIC is still not where they want to be for timeliness for locates. Still striving to get to those higher numbers. June class did not go as planned. Next class starts on Monday, 8 people signed up to be there. 5 just out of Sioux Falls. Found 4 in Pierre.

57 folks right now painting and on the ground. DIQ is 1.61, backlog is at about 556.

**USIC South Dakota Meeting Notes – June 2023**

**Meeting date - 07/13/23**

Discussed OTR/OTC Performance Number for June. Ticket Volume decreased down to 13,019K. OTR remained pretty flat at 85.24% and OTC slipped a little and ended at 72.82%. YoY performance numbers are so much better than they were a year ago. Much improved by almost 10%.

Have had some issues with Alliance in the Canton Area with them cutting our fiber on their project. The project has 1 mile left to do and then they are done. The other issue has just been that we have not been on the ticket so USIC has had to call Sadie to get us added to the ticket.

USIC is still not where they want to be for timeliness for locates. Still striving to get to those higher numbers. June class did not go as planned. Next class starts on Monday, 8 people signed up to be there. 5 just out of Sioux Falls. Found 4 in Pierre.

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October 25, 2023

Page 3

53 folks right now painting and on the ground. DIQ is 2.15, backlog is at about 582. Have a 400 close ticket strategy for the weekend for employees to work on to get caught back up.

**USIC South Dakota Meeting Notes – May 2023**

**Meeting Date - 06/14/23**

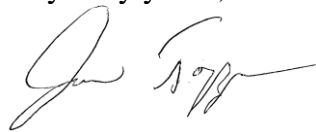
Discussed OTP/OTC Performance Number for May. Ticket Volume had another increase and jumped to 14,526. OTR was at 85.21% and OTC was at 73.92%. Trying to maintain ticket volume but had a person to leave. SD811 called USIC about people over calling in tickets. 140 drop tickets. 2 miles being the longest distance to call in on a ticket. Not a lot for enforcement. Have way more locators this year than last year. Alliance Communications is doing a big fiber overbuild out there and since they are running behind they are calling in as much as they can.

Just couldn't stay ahead and had a problem getting tickets rescheduled. Now have someone on the phone calling to make sure tickets can be rescheduled to help maintain ticket load.

55 folks right now painting and on the ground. 1 came to class for June 5th. Have another one July 15 slated to have 6 candidates. DIQ is 2.41, backlog is at about 30%. Doing an all hands weekend this weekend.

USIC improved its on-time completion percentage in 2023 compared to 2022 (77% to 62%). We will continue to work with USIC to monitor and improve performance in this dynamic and important aspect of our industry.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jason D. Topp". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jason D. Topp

JDT/bardm

cc: Service List (via e-mail)