

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

In the Matter of the Complaint filed by Jon D. and
Barbara J. Wilson, Hill City, South Dakota, against
CenturyLink Regarding a Telephone Service
Dispute

Docket No. CT14-002

**QWEST CORPORATION DBA CENTURYLINK QC'S AMENDED ANSWER
TO THE COMPLAINT OF JON D. AND BARBARA J. WILSON**

CenturyLink submits this amended answer to the complaint filed by Jon D. and Barbara J. Wilson related to telephone service provided to them at 11061 Castle Creek Road, 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. Wilson 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 Wilsons. CenturyLink has committed to take those recommended actions at a 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. Wilson 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 Wilsons' 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. The Wilsons are served by the same system that is the subject of a complaint

filed by Mr. and Mrs. Ferebee and, therefore, repair efforts associated with their services largely overlap.

CenturyLink has made extensive efforts to address those issues.

- In the spring of 2012, CenturyLink assigned a single technician in charge of the Wilsons' 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 appear to have addressed concerns for a period of time. The most recent issues experienced by the Wilsons coincided with several lightning storms in the spring and summer of 2014. Most recently, after a technician 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 still existed at each repeater location with readings above specifications. The specialist also identified grounding issues 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

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.

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.

CenturyLink generally admits the allegations in unnumbered paragraphs of the complaint although its repair records show a variety of causes of service outages, some of which are related to CenturyLink's service and some of which are not. Nonetheless, CenturyLink does not dispute that service issues have existed with these customers.

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, scheduled for December 3, 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.

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CENTURYLINK QC



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