

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

**In the Matter of the Application of
CenturyLink Public Communications, Inc.
dba CenturyLink for an Amended
Certificate of Authority to Provide
Interexchange Long Distance Services as an
Alternative Operator Service**

Docket No. TC14-022

**CENTURYLINK PUBLIC COMMUNICATIONS, INC. DBA
CENTURYLINK'S RESPONSES TO THE SOUTH DAKOTA
PUBLIC UTILITIES COMMISSION STAFF'S INFORMATION REQUESTS**

CenturyLink Public Communications, Inc. dba CenturyLink, for its responses to the South Dakota Public Utilities Commission Staff's Information Requests, states as follows:

1-1) Does CPCI currently have any prepaid calling customers?

Response: CPCI does not currently have any prepaid calling customers in South Dakota. CPCI does have prepaid calling customers in other states.

1-2) Pursuant to 20:10:24:05(2), what type of service quality standards (including call processing time requirements) does Consolidated have in place for measuring the company's service performance? Further, are the service quality standards able to be submitted to the Commission upon request?

Response: The service quality standards that CPCI has in place for inmate calling services at a particular correctional facility are generally addressed in the contract that CPCI enters into with the correctional facility. More generally, CPCI regularly measures a number of consumer service quality standards for the facilities it serves. A typical service quality metric is call center average speed of answer. For some correctional facilities, billing and customer service escalations are tracked. CPCI will also conduct rate audits periodically at

some correctional facilities. In CPCI's experience, correctional facilities take service quality seriously because of the potential inmate morale issues that can arise if there is bad service quality. For example, the contract in CPCI's contract with the Texas Department of Corrections contains the following language:

The Department will work with the Contractor during implementation to develop acceptable called party customer service metrics and performance measures. Superior customer service is a priority to the Department.

The Department expects to hold regular performance meetings with the Contractor in which performance issues, including customer service will be discussed. These meetings will occur at least quarterly. The Department requires the Contractor to be responsive to the Department's customer service needs, including needs of called parties. Additionally, the Department expects the level of customer service outlined during the negotiation meetings presentations.

The service quality standards that CPCI agrees to in a contract with a correctional facility in South Dakota would be available to the Commission upon request.

1-3) In the application on page 6, section 13, CPCI states, "CPCI posts information concerning its rates, terms and conditions for service on its website." Will this information be posted near the phones as well since the inmates may not have access to the internet?

Response: Yes. CPCI coordinates with each correctional facility to post rates and telephone use policies near the phones or at such other places as the correctional facility deems appropriate.

1-4) Explain, in detail, why CPCI believes each item it is requesting a waiver for in response to ARSD 20:10:24:02.20 in the application is not applicable.

Response: The requirements of 20:10:24:05 for which CPCI seeks a waiver are not appropriate for the following reasons:

Subsection 20:10:24:05(3) is not appropriate because correctional facilities are normally served just by a single provider and inmates do not have a choice of other providers

when placing calls. The contracts with correctional facilities limit service to a single provider because of security issues that are unique to correctional facilities.

Subsection 20:10:24:05(4)(c) and (d) are not appropriate because inmate calling service providers use automated operator services to handle inmate calls, have different methods of recovering charges from inmates, and have pre-established processes for handling complaints from inmates or called parties that are unique to the ICS business.

Subsection 20:10:24:05(5) is not appropriate because correctional facilities must have the ability to block calls for security reasons. Call blocking prevents inmates from using calls to do such things as threaten witnesses and jurors.

Subsection 20:10:24:05(6) is not appropriate because inmate telephones are not used to place calls to 911. Emergencies within correctional facilities are handled by each correctional facility apart from the 911 system.

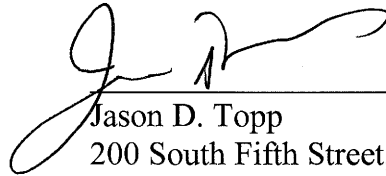
Subsection 20:10:24:05(7) is not appropriate because inmate calling service providers use telephone numbers to itemize, identify and rate calls and typically take steps as directed by correctional facilities to prevent call forwarding and to limit calls to certain third parties to conform to restrictions imposed by correctional facilities.

Subsection 10:10:24:05(11) is not appropriate because the Telephone Operator Consumer Services Improvement Act of 1990 does not apply to inmate only telephones. Report and Order, In the Matter of Policies and Rules Concerning Operator Service Providers, 6 FCC Rcd 2744, 2752, ¶15 (Rel. April 15, 1991).

CPCI notes that the Commission granted a waiver of each of these requirements in its order approving the certification of Pay Tel Communications.

Dated this 7th day of July, 2014.

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