

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

**In the Matter of the Application by Qwest
Corporation dba CenturyLink QC for Approval of
Waiver of Switched Access Cost Study**

Docket No. TC20-001

**QWEST CORPORATION DBA CENTURYLINK QC'S
RESPONSE TO THE SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION STAFF'S DATA REQUEST**

Qwest Corporation dba CenturyLink QC ("CenturyLink"), for its response to the South Dakota Public Utilities Commission Staff's Data Requests, states as follows:

- 1.1 Refer to CenturyLink's application for waiver. CenturyLink states that "producing such a study is costly and consumes a great deal of resources". Provide an estimate on how much it would cost CenturyLink to produce a cost study.

Response:

At the federal level, such cost studies no longer apply to price cap carriers such as CenturyLink. In 2001, the FCC imposed a freeze on the Part 36 category relationships and jurisdictional cost allocation factors for price cap carriers until such time as comprehensive reform of the separations rules could be completed. This freeze is still in effect today.

In 2008, the FCC granted price cap carriers forbearance from the separations rules. Once their rates have been initialized, separated cost data is not used to set rates. Thus, separations for price cap carriers has become obsolete. As a result, only carriers subject to rate-of-return regulation are required to produce separations results.

From a CenturyLink perspective, the jurisdictional separations process as outlined in Parts 36 and 69 of Title 47 of the Code of Federal Regulations is no longer used to determine interstate access rates because CenturyLink is under price cap regulation in the federal

jurisdiction. As such, CenturyLink is no longer required to produce Part 36 and Part 69 interstate separations studies.

South Dakota rules require a cost study based on a methodology identical to that used to produce the FCC Part 36 and 69 jurisdictional separations studies. These studies have been frozen since CenturyLink elected to operate under price cap regulation in the federal jurisdiction. In addition, CenturyLink no longer has the systems and resources required to produce jurisdictional separations studies that could be used as the basis for determining rates. Thus, a usage-based element study would require time to develop a switching cost model, perform usage studies, and then complete the cost study. CenturyLink estimates it would need a minimum of 6 months to ensure accurate usage studies can be completed along with proper development of a switching cost model. Estimated cost includes technicians to initiate switch usage, finance to analyze transactions to impute costs into the formats required by the SD Commission, economic cost team to develop a switch cost model – from inputs to results. Such an effort would require no less than 500 hours at ~ \$100 per hour.

Such an effort would serve no purpose because the FCC has significantly altered switched access rates, even on an intrastate basis. Intrastate terminating access rates have fallen to zero and the FCC is now addressing originating rates. *See Connect America Fund*, WC Docket No. 10-90, et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, ¶¶ 736-846 for terminating access rates and *In the Matter of 8YY Access Charge Reform*, WC Docket No. 18-156, for originating rates.

1.2 CenturyLink also states in its application that “preliminary analysis based on past studies indicates that a cost study would likely justify higher rates than those from the last submitted study.”

- a) Please provide when the last cost study was prepared and submitted and when the last cost study was filed for which current rates are based upon.**

- b) **Provide the preliminary analysis that indicates a cost study would likely justify higher rates.**

Response:

The last South Dakota cost study CenturyLink could identify was created in 2002 and based on 2001 data. It supported a terminating rate of \$0.06 per minute of use. It does not appear that this cost study was filed with the Commission. Commission records show similar access rates in place dating back to 1999. See Docket No. TC99-073 (maintaining terminating rate from prior proceedings).

If that study were replicated today, the costs would change some from 20 years ago but the most important component of cost, labor, would have gone up.

This cost figure would then need to be divided by a much smaller number of minutes of use. Today, CenturyLink serves less than 25 percent of the access lines it did in 2000. Minutes of use for switched access have dropped off precipitously and continue to do so.

Thus, the resulting cost per minute of use would likely be significantly higher than the rates generated in 2002. Such an effort makes little sense in light of federal rules that will cap significant rates at a level much lower than existed in 2002. Moreover, the FCC Order 11-161 froze originating rates at the time of the Order. The FCC has shifted to recognizing the cost causer as the end-user and has thus allowed for rate increases to end-users on a flat rate basis instead of access rates.

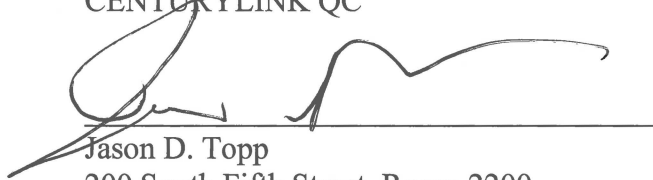
- 1.3. Provide all access rates and associated tariff pages that would be the subject of such a cost study the waiver is requested for.**

Attached are the tariff pages that encompass the FCC USF/ICC Order that preempts the states in switched access rates. The FCC currently has a FNPRM for Originating 8YY traffic which is the majority of CenturyLink's originating switched access traffic.

CenturyLink has over 100 rates in our Switched Access Service section of our tariffs.

Dated this 9th day of March, 2020.

QWEST CORPORATION DBA
CENTURYLINK QC

A handwritten signature in black ink, appearing to read "Jason D. Topp", is written over a solid horizontal line. The signature is stylized and extends above and below the line.

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6. SWITCHED ACCESS SERVICE

6.8 RATES AND CHARGES

6.8.1 SWITCHED TRANSPORT

A. Entrance Facility Monthly Rates

	MONTHLY RATE	(T)
1. Electrical Interface		
• Voice Grade, per point of termination	\$ 51.35	(T)
• DS1, per DS1	92.18	
• DS3, per DS3	1,083.53	(T)
2. Optical Interface[1]		
• DS3, per DS3	619.68	(T)

[1] For Shared Use only as set forth in 2.7, preceding.

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6.8.1 SWITCHED TRANSPORT (Cont'd)

B. Direct-Trunked Transport Monthly Rates

MILEAGE BANDS	MONTHLY RATE		(T)
	FIXED	PER MILE	
1. Voice Grade			
0	—	—	(T)
Over 0 to 8	\$ 20.86	\$ 0.27	
Over 8 to 25	21.28	0.15	
Over 25 to 50	20.37	0.13	
Over 50	24.46	0.29	(T)
2. DS1			
0	—	—	(T)
Over 0 to 8	45.27	6.85	
Over 8 to 25	57.70	7.23	
Over 25 to 50	62.71	7.61	
Over 50	69.05	7.96	(T)
3. DS3			
0	—	—	(T)
Over 0 to 8	429.89	71.01	
Over 8 to 25	412.09	45.79	
Over 25 to 50	413.55	46.72	
Over 50	520.36	58.94	(T)

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6.8.1 SWITCHED TRANSPORT (Cont'd)

C. Tandem-Switched Transport Usage Rates

MILEAGE BANDS	RATE PER ACCESS MINUTE FIXED	PER MILE
1. Tandem Transmission		
• Originating		
0	-	-
Over 0 to 8	\$0.000237	\$0.000015
Over 8 to 25	0.000273	0.000018
Over 25 to 50	0.000308	0.000019
Over 50	0.000311	0.000020
• Terminating – Tandem 3rd Party (C)		
0	-	-
Over 0 to 8	0.000240	0.000030
Over 8 to 25	0.000240	0.000030
Over 25 to 50	0.000240	0.000030
Over 50	0.000240	0.000030
• Terminating – Tandem End Office (N)		
0	-	-
Over 0 to 8	0.000000	0.000000
Over 8 to 25	0.000000	0.000000
Over 25 to 50	0.000000	0.000000
Over 50	0.000000	0.000000 (N)

(M)

(M) Material moved to Page 139.1.

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6.8.1 SWITCHED TRANSPORT (Cont'd)

C. Tandem-Switched Transport Usage Rates

RATE PER ACCESS MINUTE

2. Tandem Switching Charge:	
Originating	\$0.007664
Terminating – Tandem 3rd Party	0.002252
Terminating – Tandem End Office	0.000000 (R)
3. Common Transport Multiplexing:	
Originating	0.000036
Terminating – Tandem 3rd Party	0.000036
Terminating – Tandem End Office	0.000000

**MONTHLY
RATE**

4. Access Tandem Trunk Port Charge, per port	\$6.00
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6. SWITCHED ACCESS SERVICE

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6.8.1 SWITCHED TRANSPORT (Cont'd)

D. Nonrecurring Charges

1. Entrance Facility Installation

	NONRECURRING CHARGE	(T)
a. Voice Grade, per point of termination	\$ 99.00	
b. DS1, per point of termination	313.25	
c. DS3, per point of termination	313.25	(T)

2. Line or Trunk Installation

a. Interface Groups 1 and 2

• First line or trunk	446.82	(T)
• Each additional line or trunk	77.40	(T)

b. Interface Group 6

• First line or trunk	412.28	(T)
• Each additional line or trunk	42.64	(T)

c. Interface Group 9

• First line or trunk	409.32	(T)
• Each additional line or trunk	40.34	(T)

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6.8.1 SWITCHED TRANSPORT

D. Nonrecurring Charges (Cont'd)

3. Moves within the Same Serving Wire Center[1]

	NONRECURRING CHARGE	(T)
a. Switched Access Service, per line or trunk associated with Interface Groups 1 and 2		
• First line or trunk	\$318.17	(T)
• Each additional line or trunk	32.42	(T)
b. Switched Access Service, per line or trunk associated with Interface Group 6		
• First line or trunk	297.41	(T)
• Each additional line or trunk	10.43	(T)
c. Switched Access Service, per line or trunk associated with Interface Group 9		
• First line or trunk	296.17	(T)
• Each additional line or trunk	9.10	(T)

[1] This charge is in addition to the Entrance Facility charge.

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6.8.1 SWITCHED TRANSPORT

D. Nonrecurring Charges (Cont'd)

4. Moves to a Different Serving Wire Center

	NONRECURRING CHARGE	(T)
a. Switched Access Service, per line or trunk associated with Interface Groups 1 and 2		
• First line or trunk	\$369.87	(T)
• Each additional line or trunk	49.14	(T)
b. Switched Access Service per line or trunk associated with Interface Group 6		
• First line or trunk	335.00	(T)
• Each additional line or trunk	12.16	(T)
c. Switched Access Service per line or trunk associated with Interface Group 9		
• First line or trunk	332.65	(T)
• Each additional line or trunk	9.68	(T)

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D. Nonrecurring Charges (Cont'd)

5. Service Rearrangement

a. SS7 Out of Band Signaling

(1) Service Order Rearrangement Charge

**NONRECURRING
CHARGE**

(T)

- One-way transmission to SS7
FGD two-way

\$ 97.72

(T)

- Two-way transmission to SS7
FGD two-way

97.72

(T)

(2) SS7 Trunk Rearrangement Charge

(a) One-way transmission to SS7 FGD
two-way

- Per first trunk in a SS7 trunk
group

- Interface Groups 1 and 2
- Interface Group 6
- Interface Group 9

180.34

(T)

176.44

|
(T)

176.44

(T)

- Per each additional trunk in
a SS7 trunk group

- Interface Groups 1 and 2
- Interface Group 6
- Interface Groups 9

15.18

(T)

11.28

|
(T)

11.28

(T)

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D.5.a.(2) (Cont'd)

(b) Two-way transmission to SS7 FGD two-way	NONRECURRING CHARGE	(T)
• Per first trunk in a SS7 trunk group		
- Interface Groups 1 and 2	\$152.81	(T)
- Interface Group 6	148.91	
- Interface Group 9	148.91	(T)
• Per each additional trunk in a SS7 trunk group		
- Interface Groups 1 and 2	12.39	(T)
- Interface Group 6	8.50	
- Interface Group 9	8.50	(T)
b. FGB or FGD Tandem to Direct Routed Access		
• Per first trunk in a Direct Routed Trunk Group		
- Interface Groups 1 and 2	156.39	(T)
- Interface Group 6	144.30	
- Interface Group 9	143.26	(T)
• Per each additional trunk in a Direct Routed Trunk Group		
- Interface Groups 1 and 2	27.09	(T)
- Interface Group 6	15.71	
- Interface Group 9	14.86	(T)

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D.5. (Cont'd)

	NONRECURRING CHARGE	(T)
c. FGD Service with SS7 out of band signaling to FGD Service with SS7 out of band signaling and Clear Channel Capability		
• Per first trunk		
- Interface Group 6	\$206.14	(T)
- Interface Group 9	204.66	(T)
• Per each additional trunk		
- Interface Group 6	22.44	(T)
- Interface Group 9	21.23	(T)
d. Rollover Charges		
• Rollover of existing Voice Grade Service onto a multiplexed DS1 Service, per service termination	57.76	(T)
• Rollover of existing DS1 Service onto a multiplexed DS3 Service, per DS1 Service termination affected	122.50	(T)

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6.8 RATES AND CHARGES

6.8.1 SWITCHED TRANSPORT (Cont'd)

E. Optional Features

1. Multiple POTs Tandem Sectorization (MPTS)

	NONRECURRING CHARGE	(T)
• MPTS ASR (without associated trunk activity), per ASR	\$ 46.32	(T)
• MPTS Establishment (without associated trunk activity)		
- Per FGC sector	307.37	(T)
- Per FGD sector	179.59	(T)
• MPTS Establishment (with associated trunk activity)		
- Per FGC sector	307.37	(T)
- Per FGD sector	179.59	(T)
• MPTS Rearrangement (without associated trunk activity)		
- Per FGC sector	44.93	(T)
- Per FGD sector	30.96	(T)
• MPTS Rearrangement (with associated trunk activity)		
- Per FGC sector	44.93	(T)
- Per FGD sector	30.96	(T)

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6.8.1 SWITCHED TRANSPORT

E. Optional Features (Cont'd)

2. Customer specification of the receive transmission level at the first point of switching within a range acceptable to the Company, per Line or Trunk[1]
3. Customer specification of Local Transport Termination four-wire termination in lieu of two-wire termination, per Line or Trunk[2]

(D)

(T)

(T)

[1] Available with Interface Groups 2, 6 and 9. The range of transmission levels which may be specified is described in Technical Reference GR-334-CORE.

[2] Available with FGB.

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6.8.1 SWITCHED TRANSPORT

E. Optional Features (Cont'd)

	NONRECURRING CHARGE	MONTHLY RATE	(T)
4. Multiplexing[1]			
• Entrance Facility, per arrangement			
- DS1 to Voice Grade	\$ 75.00	\$199.98	(T)
- DS3 to DS1	200.00	252.37	(T)
• DTT Facility, per arrangement			
- DS1 to Voice Grade	75.00	199.98	(T)
- DS3 to DS1	200.00	252.37	(T)

[1] Nonrecurring charges apply when the MUX is not installed at the same time as an Entrance Facility or a DTT facility.

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6. SWITCHED ACCESS SERVICE

6.8 RATES AND CHARGES (Cont'd)

6.8.2 LOCAL SWITCHING

A. Local End Office Switching

	RATE PER ACCESS MINUTE
• LS1 - Feature Groups A and B	
Originating	\$0.008557
Terminating	0.000000 (R)
• LS2 - Feature Groups C and D	
Originating	0.008557
Terminating	0.000000 (R)
• End Office Shared Port	
Originating	0.000747
Terminating	0.000000
	MONTHLY RATE
• End Office Dedicated Trunk Port,[1] per trunk	\$3.00

[1] The End Office Dedicated Trunk Port rate was calculated based upon a 50/50 split between originating and terminating traffic using this flat-rated port. The FCC in their FCC 11-161 ICC Transformation order in section 51.907(d)(1) allowed Price Cap Carriers to use an equal split to divide the charge between originating and terminating elements. When the terminating portion of the rate is reduced and then combined with the originating portion of the rate a single flat rate is generated for billing purposes. The Originating portion of the charge is \$3.00.

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6. SWITCHED ACCESS SERVICE

6.8 RATES AND CHARGES

6.8.2 LOCAL SWITCHING (Cont'd)

B. Common Switching Optional Features

- (D)
- 1. Call Denial on Line or Hunt Group
(available with FGA),
per line (T)
- 2. Service Code Denial on Line or
Hunt Group (available with FGA),
per line (T)
- 3. Hunt Group Arrangement
(available with FGA), per line (T)

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6.8 RATES AND CHARGES

6.8.2 LOCAL SWITCHING

B. Common Switching Optional Features (Cont'd)

- | | |
|--|-----|
| | (D) |
| 4. Uniform Call Distribution Arrangement (available with FGA), per Line | (T) |
| 5. Nonhunting Number for use with Hunt Group Arrangement or Uniform Call Distribution Arrangement (available with FGA), per line | (T) |
| 6. Automatic Number Identification (Available with FGB, FGC and FGD), per trunk group[1] | (T) |

[1] Subsequent orders only.

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6.8 RATES AND CHARGES

6.8.2 LOCAL SWITCHING

B. Common Switching Optional Features (Cont'd)

- | | | |
|-----|---|-----|
| | | (D) |
| 7. | Up to 7-Digit Outpulsing of Access Digits to customer (available with FGB), per trunk group | (T) |
| 8. | Cut-Through (available with FGD), per end office or access tandem | (T) |
| 9. | Delay Dial Start-Pulsing Signaling (available with FGC), per trunk group | (T) |
| 10. | Immediate Dial Pulse Address Signaling (available with FGC), per trunk group | (T) |
| 11. | Dial Pulse Address Signaling (available with FGC), per trunk group | (T) |
| 12. | Revertive Pulse Address Signaling (available with FGC), per trunk group[1] | (T) |
| 13. | Service Class Routing (available with FGC and FGD), per trunk group | (T) |

[1] Available with existing service only.

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6.8.2 LOCAL SWITCHING

B. Common Switching Optional Features (Cont'd)

14. Alternate Traffic Routing

- Multiple Customer Premises Alternate Routing (available with FGB, FGC and FGD), per trunk group
- End Office Alternate Routing When Ordered in Trunks (available with FGB, FGC and FGD)
 - Per trunk
 - Per trunk group

(D)

(T)

(T)

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6.8 RATES AND CHARGES

6.8.2 LOCAL SWITCHING

B. Common Switching Optional Features (Cont'd)

- | | | |
|-----|---|-----|
| | | (D) |
| 15. | Trunk Access Limitation Arrangement
(available with FGC and FGD), per
end office | (T) |
| 16. | Band Advance for use with WATS Access
Service (available with FGA, FGB, FGC
and FGD), per hunt or trunk group | (T) |
| 17. | Panel Call Indicator Address Signaling
(available with FGC), per trunk group[1] | (T) |
| 18. | End Office End User Line Screening for use
with WATS Access Service (available with
FGC and FGD), per line | (T) |
| 19. | Hunt Group for use with WATS Access
Service (available with FGA, FGB, FGC
and FGD), per hunt group | (T) |
| 20. | Uniform Call Distribution for use with
WATS Access Service (available with
FGA, FGB, FGC and FGD), per hunt group | (T) |
| 21. | Nonhunting Number for use with Hunt
Group or Uniform Call Distribution for
use with WATS Access Service (available
with FGA, FGB, FGC and FGD), per line | (T) |

[1] Available with existing services only.

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6.8 RATES AND CHARGES

6.8.2 LOCAL SWITCHING

B. Common Switching Optional Features (Cont'd)

	NONRECURRING CHARGE	MONTHLY RATE	(T)
22. Clear Channel Capability (available with FGD), per trunk group[1]	\$12.50	—	(T)

[1] The flat rated Clear Channel Capability charge was calculated based upon a 50/50 split between originating and terminating. The FCC in their FCC 11-161 ICC Transformation order in section 51.907(d)(1) allowed Price Cap Carriers to use an equal split to divide the charge between originating and terminating elements. When the terminating portion of the rate is reduced and then combined with the originating portion of the rate, a single flat rate is generated for billing purposes.

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6.8 RATES AND CHARGES

6.8.2 LOCAL SWITCHING (Cont'd)

C. Transport Termination Optional Features

- (D)
- 1. Line Side Terminations (available with FGA)
 - Two Way Operation
 - Dial Pulse with Loop Start (T)
 - Dial Pulse with Ground Start (T)
 - DTMF with Loop Start (T)
 - DTMF with Ground Start (T)
 - Terminating Operation
 - Dial Pulse with Loop Start (T)
 - Dial Pulse with Ground Start (T)
 - DTMF with Loop Start (T)
 - DTMF with Ground Start (T)
 - Originating Operation
 - Loop Start (T)
 - Ground Start (T)
- 2. Trunkside Terminations
 - Standard Trunk or Originating, (available with Trunkside Access) (T)
 - Terminating (available with Trunkside Access) (T)
 - Two Way (available with Trunkside Access) (T)
 - Operator Trunk, Coin, Non-Coin or Combined Coin and Non-Coin (available with FGC and FGD) (T)
 - Operator Trunk, Full Feature Arrangement (available with FGD) (T)

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6.8 RATES AND CHARGES (Cont'd)

6.8.3 INTERCONNECTION CHARGE

RATE PER
ACCESS MINUTE

- Originating
- Terminating

\$0.004681
0.000000 (R)

(T)
(C)
(C)

6.8.4 MESSAGE UNIT CREDIT

FGA
ACCESS MINUTE[1]

- Rate per originating

\$(0.001726)

6.8.5 RESERVED FOR FUTURE USE

[1] () equals a negative amount.

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6. SWITCHED ACCESS SERVICE

6.8 RATES AND CHARGES (Cont'd)

6.8.6 900 ACCESS SERVICE

	NONRECURRING CHARGE	(T)
• Per first NXX, per end office/ tandem	\$101.71	(T)
• Per each subsequent NXX, per End Office/Tandem	23.86	(T)
• Expanded 900 Option per end office/tandem with NXX activity (available with CST3 and FGD)	874.81	(T)
• Expanded 900 Option per end office/tandem without NXX activity (available with CST3 and FGD)	950.88	(T)
	RECURRING CHARGE	
• 900 Customer Identification Charge	\$0.000994	

6.8.9 800 DATA BASE ACCESS SERVICE

	RATE PER CALL/QUERY	
• 800 Carrier Identification Charge, per call	\$0.003312	
• Vertical Features		
- POTS Translation Charge, per call	0.003665	
- Call Handling & Destination Feature Charge, per query	0.000694	