

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

**In the Matter of CenturyLink QC’s Petition for Docket No. TC20-047
Elimination of the Qwest Performance Assurance
Plan and Performance Indicator Definitions**

**QWEST CORPORATION DBA CENTURYLINK QC’S
RESPONSES TO THE SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION STAFF’S DATA REQUESTS**

Qwest Corporation dba CenturyLink QC (“CenturyLink”), for its responses to the South Dakota Public Utilities Commission Staff’s Data Requests, states as follows:

- 1.1. Refer to page 1 of the Petition where it says the services the PIDs and PAPs cover “have declined as the FCC has reduced the unbundled network elements Regional Bell Operating Companies (RBOCs) such as CenturyLink QC are required to offer CLECs”. Which services have been removed and which are still in place?**

Response:

**L-QC PID/PAP Product Specific List
Products still in place**

LIS Trunks
Local Number Portability (LNP)
Enhanced Extended Loops-DS1 (EEL)
Unbundled Sub-Loop
Unbundled 2 Wire Non-Loaded Loop
Unbundled ADSL
Unbundled DS1
Unbundled xDSL-I
Resale Residential Voice *
Unbundled Analog Loop *

*Some metrics removed in 2020, remaining to be removed on 8/2/22 per UNE Forbearance Order

Products Removed

Resale Business Voice
Resale Centrex
Resale Centrex 21
Resale ISDN Basic
Resale ISDN Primary
Resale DS0
Resale DS1
Resale DS3 and higher
PBX Trunks
E911/911 Trunks
Dark Fiber
Frame Relay
QWEST DSL
UDIT – Above DS1 level
UDIT – DS1 level
UNE-P (POTS)
UNE-P Centrex
UNE-P Centrex 21
Shared Loop/Line Sharing
Unbundled 4 Wire Non-Loaded Loop
Unbundled Loops with Conditioning
Unbundled ISDN-capable Loop
Unbundled DS3 and higher Loop

- 1-2. Refer to page 2 of the Petition where it says “the PAPs were negotiated to provide additional assurance of continued appropriate interconnection and network access between Qwest and CLECs”. Explain any remaining mechanisms that will be in place to provide assurance to the CLECs of continued appropriate interconnection and network access.**

Response:

The interconnection agreements will remain. CLEC products and services will continue to be negotiated and adhered to under their interconnection agreements. The petition to eliminate the PID and PAP does not change those contractual obligations nor interfere with operational functions to installation services and repair all our offered products. The ordering systems and processes used to provide service to wholesale customers remain intact.

1-3. How did CenturyLink assure that it sent individual notices to all CLECs doing business in South Dakota on July 24? Reconcile the list provided on pages 6 through 77 of Appendix 3 with the list of CLECs on the following PUC website: <https://puc.sd.gov/commission/telecom/clec.pdf>

Response:

The notification email system, Customer Contact Database (CCDB), is dependent on CLECs updating their email addresses appropriately and opting into the type of notifications they approve to receive. Although the original notice sent on June 20, 2020 was submitted to all CLECs based on their approved notice settings, once that notice was sent, it was discovered many email addresses were missing from the information provided by the CLECs and that we needed to override the notice approval settings so all CLECs would receive this information per the Commission request. We used the PUC website to obtain missing email addresses, updated the CCDB information, and resent the notices to incorporate the updated list and notice settings on July 23, 2020.

1.4. Have any of the CLECs contacted CenturyLink with any concerns about this filing since the time this filing was made on July 31, 2020? Explain.

Response:

Each notice included the following information: “If you have any questions or would like to discuss this notice please contact Nancy Tangeman at Nancy.tangeman@centurylink.com.”

Ms. Tangeman has not received any concerns directly from any CLEC or through any CLEC account manager. The only communication CenturyLink received was an email from Larry Couch with Action Communications, Inc. on July 24, 2020 stating, “Action does not have any services in South D. so this does not apply to us.”

1.5. Will CenturyLink have any obligation to provide the services and perform the repairs shown on the tables on page 4 of the Petition if this request is approved? Explain.

Response:

Yes. See responses to Data Request Nos. 1-2 and 1-3.

1.6. Does CenturyLink have similar PAPs and PIDs in its other jurisdictions? If so, have they been eliminated in the other jurisdictions? Explain.

Response:

CenturyLink has PAPs and PIDs in the 14-state former USWEST region. This is the first filing seeking to remove them in that region. Certain states had CenturyLink/Qwest merger commitments that required the plans remain in place through 2019. South Dakota has the lowest CLEC volume and payments of any state in the region.

Dated this 5th day of October, 2020.

QWEST CORPORATION DBA
CENTURYLINK QC



Jason D. Topp
200 South Fifth Street, Room 2200
Minneapolis, MN 55402
(651) 312-5364
Jason.topp@centurylink.com