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September 6, 2024

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

Re: **In the Matter of the Request of Qwest Corporation dba CenturyLink QC
for Certification Regarding Its Use of Federal Universal Service Support
(Study Area: 395145)
Docket No. TC24-032**

Dear Ms. Van Gerpen:

In the August 27, 2024 Commission meeting Commissioners asked for additional information related to CenturyLink's services in South Dakota

1. **Locates**

CenturyLink uses USIC as its locate vendor in South Dakota. CenturyLink meets with USIC monthly to review performance, review headcount, and identify problem areas. In addition, we receive updates addressing issues that arise each month.

Two key metrics from CenturyLink's perspective are on-time responses and on-time completion.

A locate is considered completed on-time (OTC) when it is marked and responded to the 811 system with an appropriate "Positive Response" applied to the locate request before the end of the designated 48 hour time-period in South Dakota law.

At times, because tickets are a part of a large project, the customer actually needs to locate at a time later than the statutory timeframe, or for a variety of other reasons, it may be appropriate for the locator to file a response rather than actually complete the locate within the 48-hour time period. On-time response (OTR) reflects the timeliness of all responses. CenturyLink references both measurements when evaluating locator performance.

Over the last 18 months, CenturyLink’s data shows the following performance:

Month	Ticket Volume	OTC Ticket %	OTR Ticket %
January 2023	1,818	78.27%	84.60%
February 2023	1,638	85.29%	89.80%
March 2023	3,164	82.40%	89.29%
April 2023	10,205	72.10%	85.69%
May 2023	14,525	73.31%	85.23%
June 2023	13,019	72.55%	85.26%
July 2023	11,164	75.30%	85.63%
August 2023	11,117	77.35%	84.20%
September 2023	9,972	77.00%	84.16%
October 2023	9,808	79.70%	86.01%
November 2023	7,274	84.37%	88.59%
December 2023	3,789	83.03%	87.52%
January 2024	2,283	81.56%	87.87%
February 2024	2,912	87.60%	91.17%
March 2024	6,631	78.69%	88.75%
April 2024	11,024	76.28%	87.79%
May 2024	11,756	78.31%	85.69%
June 2024	10,323	76.88%	85.29%
July 2024	10,646	71.18%	81.06%
Total	153,068	76.71%	85.78%

CenturyLink acknowledges that this performance in South Dakota needs to improve. We have asked USIC to provide us with a get-well plan, which we can share with the Commission upon receipt.

Locate challenges this year have often been related to large fiber builds occurring in the state. Many large projects have strained USIC’s resources to *effectively* stay ahead of the fiber builds. To help address this demand, USIC has shifted locators from less busy locations outside of South Dakota to better this volume, but these measures have not always kept up with demand.

2. Outages

The Commission asked for information on outages in South Dakota. We are providing information related to 2024 outages that were significant in some respect or were discussed at the meeting.

April 2024 Ingress Outage Affecting 911

Service was lost to 28 PSAPs when Lumen performed an emergency break/fix after utility contractors placing a utility pole and using a directional boring machine damaged an unmarked, buried fiber cable.

- April 17, 2024 – date it occurred and was repaired. Duration ~ 2.5 hours.
- Fiber cut in Kansas City affected transport carrying 911 ingress traffic to South Dakota (and Nebraska)
- Outage was not within the South Dakota NG911 network itself; any OSP with direct connection to the 911 legacy network gateway had no impact

July 2024 SS7 Outage Affecting 911

- Occurred July 9, 2024. Initially restored after ~ 2.25 hours. Service went down again an hour later, and was finally restored after ~ 3.5 hours in early AM July 10.
- Hurricane Beryl caused massive power outages in Houston, including to a gateway facility used by Lumen. This, in turn, affected circuits carrying SS7 ingress traffic, including traffic to South Dakota..
- Outage was not within the South Dakota NG911 network itself

Watauga

- There have been issues in this area since May due to a road project around Morristown, that has caused several fiber and cable cuts due to proximity of CenturyLink facilities to road construction activities
- To better manage this situation, we now have technicians working ahead of the road construction crews which allows us to to keep customers in service with temporary cables and fibers.
- Nonetheless, issues will likely continue to arise. Road crews sometimes damage temporary facilities. A recent incident was due to multiple conflicts in which we had repaired a damaged copper cable only to have road crews hit the newly placed cable a day later. A week after that outage road crews got ahead of our crew due to a cable shortage at Morristown. Once the new cable arrived the repairs were made but the temporary cable was then damaged a day later.
- This road project has been a challenge but we continue to work with the road contractor to protect our facilities in order to minimize impacts.

Cable Outage Reports

Attached as Exhibit 2.1 is a report of outages in South Dakota in 2024 affecting fewer customers. Multiple lines in each report relate to a single event so the actual number of events is far smaller than the number of lines in the report. Nonetheless the report provides an overview of significant events in the state.

Cable Damages

There have been 223 instances where CenturyLink facilities have been damaged year to date in 2024, due to vehicles, cable cuts and a variety of other causes. Such events strain resources. This number appears to be a slight improvement over 2023 (251 for the same time-period, .393 for the entire year).

3.1 Internet coverage

Attached as Exhibit 3.1 is a spreadsheet that pulls data from the FCC National broadband map in CenturyLink's service territory in Minnesota. That spreadsheet shows the number of broadband serviceable locations the FCC has identified within CenturyLink's service area¹ and the number of locations CenturyLink and other service providers have reported serving within each wire center.

There are subtleties associated with this data.

- The FCC uses hexagons on the map consisting of 0.7 square mile areas. If a provider reports serving one location within that hexagon, the entire hexagon will show as being served
- Hexagons do not always line up with wire center borders. We included a hexagon as within a wire center if its central point is within our wire center. We excluded it otherwise.
- This data is based on the FCC's most recent release which contains data from January 2024.

Despite these limitations, this data provides the most comprehensive view of broadband availability in CenturyLink's service territory as of January 2024.²

¹ See this link for a definition of location: <https://help.bdc.fcc.gov/hc/en-us/articles/16842264428059-About-the-Fabric-What-a-Broadband-Serviceable-Location-BSL-Is-and-Is-Not>

² Attached as Exhibit 3.2 is our August 30, 2024 letter to the FCC relinquishing RDOF funding for our three South Dakota locations. These locations could not be served in an economic manner despite RDOF funding.

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4. Employees in South Dakota

CenturyLink currently has 143 employees in South Dakota. In 2019, we had 195 employees in the state. As of June 30, 2024 we had 20,463 access lines compared to 44,579 in 2019.

We hope this letter supplies the information the Commission requested in the August 27 meeting. We will be available at the September 10 meeting to address any follow-up questions.

/Jason Topp

JDT/mh
Enclosures