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Director Montana
Regulatory and Legislative Affairs

RECEIVED

MAR 06 2015

MONT. P.S. COMMISSION

March 6, 2015

Montana Public Service Commission
Kate Whitney
Division Administrator - Regulatory Division
1701 Prospect Avenue
Helena, MT 59620

Hand delivered and mailed

Re: Responses and objections to Data Request MCC-001 through MCC-014 in
consolidated Docket Nos. D2014.11.91 and N2014.4.38

Dear Ms. Whitney:

Transmitted with this letter are the responses of Qwest Corporation d/b/a CenturyLink QC ("CenturyLink QC") to Data Request MCC-001 through MCC-014 of the Montana Consumer Counsel ("MCC").

Included in the responses are CenturyLink QC's objections to four MCC data requests: MCC-003; MCC-004; MCC-006 and MCC-009. Notwithstanding the objections and without waiving them, CenturyLink QC is providing responses to each of these four data requests.

Most of the attachments to the responses are voluminous. If printed, they would consume many thousands of pieces of paper. In order to prevent a waste of paper and to avoid burdening the parties with thousands of pages of printed material, CenturyLink QC is providing the attachments as computer files in Excel and Acrobat format on computer diskettes. The diskettes also contain a file in a format that can be imported by an ERSI software package in response to MCC-012.

The responses to several MCC data requests include attachments and exhibits containing confidential information that should be protected from public disclosure. These attachments and exhibits are:

Kate Whitney
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- *MCC-001 Confidential Attachment B;*
- *MCC-002 Confidential Attachment A*
- *MCC-002 Confidential Attachment B;*
- *MCC-002 Confidential Attachment C;*
- *MCC-002 Confidential Attachment D;*
- *MCC-003 Confidential Attachment A;*
- *MCC-007 Confidential Attachment A;*
- *MCC-008 Confidential Attachment A;*
- *Portions of Exhibit 164 to the response to MCC-009;*
- *Portions of Exhibit 166 to the response to MCC-009;*
- *MCC-011 Confidential Attachment A;*
- *MCC-011 Confidential Attachment B;*
- *MCC-014 Confidential Attachment A.*

CenturyLink QC will file with the Commission a motion for an order protecting this information from public disclosure.

Respectfully,

A handwritten signature in black ink, appearing to read "Philip E. Grate". The signature is written in a cursive style with a long horizontal flourish extending to the right.

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

* * * * *

IN THE MATTER OF CenturyLink QC's) REGULATORY DIVISION
Service Quality and Its Response to Notice of)
Commission Action in Docket N2014.3.38,) DOCKET NO. D2014.11.91
Including Petition for Waiver of Admin. R.)
Mont. 38.5.337197)(b))

IN THE MATTER OF the Request of Staff of) REGULATORY DIVISION
the Montana Public Service Commission for)
CenturyLink Service Quality Information) DOCKET NO. N2014.4.38

**CENTURYLINK QC RESPONSES AND OBJECTIONS TO
DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL
TO CENTURYLINK**

MCC-001

Request: Regarding the information contained in Slide 2, please provide the following in electronic spreadsheet or database format and in paper format:

- a. The investment for each year from 2000 through 2013, and for 2014 when that number becomes available (please specify that date if it is not currently available).
- b. The investment by wire center for every Montana wire center for each year from 2000 through 2013 and 2014 when that number becomes available.
- c. The investment by program type, where program types are FTTN, COIP, FTTH, Fiber to the Business and Fiber to the Cell Tower, for each year from 2000 through 2013 and 2014 when that number becomes available.
- d. The investment by wire center by program type, where program types are FTTN, COIP, FTTH, Fiber to the Business and Fiber to the Cell Tower, for each year from 2000 through 2013 and 2014 when that number becomes available.

Response to part a: The requested data are contained in an electronic spreadsheet in Excel file format entitled

MCC-001 Attachment A.

The question asks for “investment” but does not define it. For purposes of responding to part “a” of the request, the attachment contains additions to plant in service recorded on the company’s books of account for the years 2000 through 2014. The data in the attachment for the years 2004 through 2013 are the data used to populate Schedule 11, column d, of the company’s annual report to the Montana PSC for the years 2004 through 2013. The data for 2014 are the same data that would be used to populate Schedule 11, column d, if the PSC requires that data to be filed in 2014 annual reports to the PSC. The data in the attachment for the years 2000 through 2003 are from the company’s MR21 report. The access line data are the access lines the company reported on Schedule 23 of its annual report to the Montana PSC for the years 2000 through 2013 and will report for 2014 if the annual reports for 2014 require that data. The company’s annual reports are readily available for review and download from the PSC’s website.

The data in *MCC- 001 Attachment A* for the years 2000 through 2013 are the data used to create the Slide 2 of the company’s the October 17, 2014 oral presentation to the Commission.

Respondent: Phil Grate, Director Regulatory and Legislative Affairs, formerly Director Regulatory Finance.

Response to parts b, c and d: The requested data are contained in an electronic spreadsheet in Excel file format entitled

MCC-001 Confidential Attachment B.

This attachment contains six worksheets as follows:

- a. IR Descriptions* provides a definition of investment reasons. This data is non-confidential and is provided below.
- b. Summary by WC* provides construction expenditures by Wire Center by year from 2000 through 2014 for all CenturyLink QC wire centers.
- c. Summary by Investment Reason* provides construction expenditures by year by Investment Reason.
- d. Summary by WC-IR* provides construction expenditures by year by Investment Reason by Wire Center.
- e. 2000-2014 data* contains the raw data used to create b, c and d.
- f. Difference ATNPS vs CP* provides a calculation of the difference between Additions to Net Plant in Service and total Construction Projects by year. This information is not confidential but is also not requested. It is provided to aid the understanding of persons reviewing the confidential data described above.

The question asks for “investment” but does not define it. The response to part “a” of this request treats as “investment” the company’s additions to plant in service recorded on the company’s books of account. The company does not have a report of additions to

plant in service by wire center by program types; additions are recorded by Part 32 account number under the FCC's Uniform System of Accounts. The available data that most closely matches the data specified in the request is found in the company's network project tracking system called "Fireworks" that the company has used to manage construction projects since it converted its accounting system from Peoplesoft to SAP at the beginning of 2012. Prior to the conversion, the company used a network project tracking system called the Job Entry Tracking System/Common Planning Document (JETS/CPD) that also did not track construction projects by the program types specified in the request. The company's network project tracking systems contain construction expenditures by year by Wire Center by Investment Reason. The following matrix describes each Investment Reason used in the attachment.

INVESTMENT REASON	DESCRIPTION OF INVESTMENTS
DROP	Drop wire needed to provide customer services (Note: Drop is not charged to specific projects, prior to 2012 these charges were allocated to all wire centers, beginning in 2012, all Drop is to the Amsterdam wire center)
FEV	Fleet, Capital Tools & Test Equipment
HSI BANDWIDTH AUGMENTATION	Increases HSI Bandwidth Capacity
HSI EXISTING MARKET EXPANSION	New HSI coverage via CO-IP & Remote Terminals including any FTTN/FTTH and CAF (Connect America Fund) investments
HSI Growth	Card additions to supply HSI subscriber demand
INVENTORY & ADJUSTMENTS	Capitalized Inventory, Accounting Adjustments, Accruals and other Miscellaneous Capital
MARKETABLE REVENUE	Co-location, E911 and Voice Mail Services
MARKETABLE REVENUE – FTTT	Fiber To The Tower services for Wireless Carriers
NATIONAL SALES	Success Based Customer Sales (Business, Wholesale, Federal & Consumer) within the state that are funded on a National basis
NETWORK PLAN – ACCESS	Local Network Access (Distribution & Feeder), Commercial Developments, High Cap Circuits (DS1 & Above), Line Extension, OSP Rehab & OSP Preservation (Like-for-Like Plan Replacements)
NETWORK PLAN – SWITCHING	Switch Growth, Upgrades, Replacements, ISDN, Switch Preservation (Like-for-Like Plan Replacements)
NETWORK RELIABILITY	Network Power (Generators, CO & OSP Batteries), Network Monitoring
NEW RES DEVELOPMENTS	Build out of New Residential Subdivisions
REAL ESTATE	Network Related Real Estate Investments

ROADMOVES	Relocation of Cables and Loop electronics mandated by jurisdictional road work activities
SPECIAL CIRCUITS/CARDS	PICS card growth for subscriber demand, like-for like replacements and maintenance spares. (Note: Cards shipped from warehouse inventory are not charged to specific projects, prior to 2012 these charges were allocated to all wire centers, beginning in 2012, all Special Circuits/Cards are charged to the Amsterdam wire center)
TRANSPORT / IP - ETHERNET CORE	Inter-office Facilities (IOF) Growth, Reconfigurable Optical Add-Drop Multiplexer (ROADM) Transport, Microwave Radio Transport, MOE Metro Optical Ethernet, Fiber Diversity

The construction expenditures in the company's network project tracking systems used to respond to parts "b," "c" and "d" of this data request do not measure the same activity as the additions to net plant used to respond to part "a" of this data request. Construction expenditures measures expenditures during a given year on construction projects; additions to net plant measure the dollar value of plant turned-up for service in a given year. Hence, the two data sources measure different financial activities (construction expenditures vs. plant put into service) and recognize those activities at different times (when the expenditure is incurred vs. when the capitalized cost is placed in service). In addition, the project tracking systems do not capture the total dollar value of all plant costs turned-up for service. Following is a calculation rounded to the nearest thousand dollars of the difference over the 15-year period of 2000 through 2014.

Total Additions to Net Plant in Service (response to part a)	\$443,476,000
Total Construction Projects (response to parts b, c and d)	<u>\$396,986,000</u>
Difference	\$46,490,000

MCC-001 Confidential Attachment B contains a worksheet entitled "*f.Difference ATNPS vs CP*" that provides a year-by-year calculation of the difference for the 15-year period of 2000 through 2014. CenturyLink QC does not have a reconciliation of the difference and does not have the data necessary to prepare such reconciliation.

CenturyLink QC is not providing *MCC-001 Confidential Attachment B* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect from public disclosure the confidential data it contains. If printed, *MCC-001 Confidential Attachment B* would consume over 650 pieces of paper. Accordingly, CenturyLink QC will provide *MCC-001 Confidential Attachment B* as an electronic spreadsheet only.

Respondent: Ray Graeve, Lead Analyst, Network Capital Planning and Phil Grate, Director Regulatory and Legislative Affairs, formerly Director Regulatory Finance.

MCC-002

Request: Regarding CenturyLink's October 17, 2014 [oral presentation] to the Commission and the attached slide presentation, slides 3 and 4, please provide in electronic spreadsheet or database format and in paper format:

- a. The addresses for the households where FTTN is deployed.
- b. The addresses for the households where COIP is deployed.
- c. The addresses for households where bonded solution is deployed.
- d. The addresses for households where FTTH is deployed.

Response:

a. Please see *MCC-002 Confidential Attachment A*, which provides the addresses where FTTN has been deployed as of December 31, 2014. Please note that the data in *MCC-002 Confidential Attachment A* does not agree with the numbers in slide 3 of the October 17, 2014 presentation for the following reasons: (1) *MCC-002 Confidential Attachment A* provides data as of December 31, 2014, while slide 3 of the October 17, 2014 presentation provides data as of August 2014; (2) Slide 3 of the October 17, 2014 presentation provides data only for downstream speeds of 7, 12, 20 and 40 mbps, while *MCC-002 Confidential Attachment A* provides data for 1.5, 3, 5, 7, 12, 20, 40, 60, 80 and 100 mbps; (3) The data in Slide 3 of the October 17, 2014 presentation includes only residential locations while the data in *MCC-002 Confidential Attachment A* includes both residential and business locations.

CenturyLink QC is not providing *MCC-002 Confidential Attachment A* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure. If printed, *MCC-002 Confidential Attachment A* would consume 1,589 pieces of paper. Accordingly, CenturyLink QC will provide *MCC-002 Confidential Attachment A* as an electronic spreadsheet only.

b. Please see *MCC-002 Confidential Attachment B*, which provides the addresses where COIP has been deployed as of December 31, 2014. Please note that the data in *MCC-002 Confidential Attachment B* does not agree with the numbers in slide 3 of the October 17, 2014 presentation for the following reasons: (1) *MCC-002 Confidential Attachment B* provides data as of December 31, 2014, while slide 3 of the October 17, 2014 presentation provides data as of August 2014; (2) Slide 3 of the October 17, 2014 presentation provides data only for downstream speeds of 7, 12 and 20 mbps, while *MCC-002 Confidential Attachment B* also provides data for 1.5, 3 and 5 mbps; (3) The data in Slide 3 of the October 17, 2014 presentation includes only residential locations while the data in *MCC-002 Confidential Attachment B* includes both residential and business locations.

CenturyLink QC is not providing *MCC-002 Confidential Attachment B* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure. If printed, *MCC-002 Confidential Attachment B* would consume 5,316 pieces of paper. Accordingly, CenturyLink QC will provide *MCC-002 Confidential Attachment B* as an electronic spreadsheet only.

c. Please see *MCC-002 Confidential Attachment C*, which provides the addresses where Bonding has been deployed as of December 31, 2014. Please note that the data in *MCC-002 Confidential Attachment C* does not “add up” to the numbers in slide 3 of the October 17, 2014 presentation for the following reasons: (1) *MCC-002 Confidential Attachment C* provides data as of December 31, 2014, while slide 3 of the October 17, 2014 presentation provides data as of August 2014; (2) Slide 3 of the October 17, 2014 presentation provides estimates of CenturyLink’s plan at the time to deploy a bonded pair solution, while *MCC-002 Confidential Attachment C* provides actual deployment data. Based on trials and further analysis, the universe of locations where bonding is being deployed has been reduced. (3) The data in Slide 3 of the October 17, 2014 presentation includes only residential locations while the data in *MCC-002 Confidential Attachment C* includes both residential and business locations.

CenturyLink QC is not providing *MCC-002 Confidential Attachment C* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure. If printed, *MCC-002 Confidential Attachment C* would consume 2,760 pieces of paper. Accordingly, CenturyLink QC will provide *MCC-002 Confidential Attachment C* as an electronic spreadsheet only.

d. Please see *MCC-002 Confidential Attachment D*, which provides the addresses where FTTH has been deployed as of December 31, 2014. Please note that the data in *MCC-002 Confidential Attachment D* data does not “add up” to the numbers in slide 4 of the October 17, 2014 presentation for the following reasons: (1) *MCC-002 Confidential Attachment D* provides data as of December 31, 2014, while slide 4 of the October 17, 2014 presentation provides data as of August 2014; (2) Slide 4 of the October 17, 2014 presentation describes planned FTTH developments. As of the end of 2014, some of these developments have not been completed and therefore are not included in *MCC-002 Confidential Attachment D*.

CenturyLink QC is not providing *MCC-002 Confidential Attachment D* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure. If printed, *MCC-002 Confidential Attachment D* would consume 10 pieces of paper. Accordingly, CenturyLink QC will provide *MCC-002 Confidential Attachment D* as an electronic spreadsheet and will provide a paper printout of that spreadsheet upon request.

Respondent: Jacob Barlow, Regulatory Operations manager and Robert Brigham, Regulatory Operations Director

MCC-003

Regarding CenturyLink's October 17, 2014 presentation to the Commission and the attached slide presentation, slide 4, please provide, in electronic spreadsheet or database format and in paper format, the census block and wire center where there is a cell tower that is served by the Fiber to the Cell Tower initiative.

Objection: CenturyLink QC objects to this request on the grounds that it seeks information that not reasonably calculated to lead to the discovery of admissible information and seeks information that is not relevant to this investigation. The Commission does not regulated the provision of fiber services to cellular towers.

Response: Notwithstanding the objection and without waiving it, CenturyLink QC is providing the requested data which are contained in an electronic spreadsheet in Excel file format entitled:

MCC-003 Confidential Attachment A.

CenturyLink QC is not providing *MCC-003 Confidential Attachment A* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure.

Respondent: Robert Brigham, Regulatory Operations Director

MCC-004

Request: Regarding CenturyLink's October 17, 2014 presentation to the Commission and the attached slide presentation, slides 3 and 5, please explain what causes the difference between the 193,223 households with fiber fed service shown on slide 3 and the 147,000 access lines shown on slide 5. Provide a work paper in electronic spreadsheet or database format that supports your explanation.

Response: The 193,223 households on page 3 of CenturyLink's October 17, 2014 presentation to the Commission represents only households that are *enabled* with fiber-fed services. These households may or may not purchase service from CenturyLink. The 147k access lines listed on page 5 of the presentation represents actual CenturyLink QC voice access lines in service. These customers purchase voice service from CenturyLink QC using several technologies including fiber and copper.

Respondent: Robert Brigham, Regulatory Operations Director

MCC-005

Does CenturyLink resell video services to any customers in Montana? If so, please provide:

- a. The date when the service was first offered.
- b. The number of customers purchasing this service by wire center on December 31, 2011, 2012 and 2013.
- c. List the companies whose video services CenturyLink resells.

Objection: CenturyLink QC objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible information and seeks information that is not relevant to the issues in this case.

Response to “a,” “b” and “c”: Notwithstanding the objection and without waiving it CenturyLink QC responds that CenturyLink QC has never resold video services in Montana. CenturyLink has an agreement with DirecTV under which CenturyLink markets and bills DirecTV satellite services as part of a bundle of services. However, under this agreement, CenturyLink acts as DirecTV’s sales and billing agent only; DirecTV provides the video service under its own brand and maintains the customer relationship.

Respondent: Robert Brigham, Regulatory Operations Director

MCC-006

Request: Does CenturyLink provide video services as part of a joint marketing arrangement to any customers in Montana? If so, please provide:

- a. The date when the service was first offered.
- b. The number of customers purchasing this service by wire center on December 31, 2011, 2012 and 2013.
- c. List the companies that CenturyLink has joint marketing arrangements with.

Objection: CenturyLink QC objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible information and seeks information that is not relevant to the issues in this case.

Response to “a,” “b” and “c”: Notwithstanding the objection and without waiving it CenturyLink QC responds that CenturyLink QC has never provided video services in

Montana. CenturyLink has an agreement with DirecTV under which CenturyLink markets and bills DirecTV satellite services as part of a bundle of services. However, under this agreement, CenturyLink acts as DirecTV's sales and billing agent only; DirecTV provides the video service under its own brand and maintains the customer relationship.

Respondent: Robert Brigham, Regulatory Operations Director

MCC-007

Request: Regarding CenturyLink's October 17, 2014 presentation to the Commission and the attached slide presentation, slide 10, please provide, in electronic spreadsheet or database format and in paper format, the number of living units and CenturyLink voice service customers by wire center.

Response: The data used for the chart on slide 10 of CenturyLink's October 17, 2014 presentation to the Commission is as follows:

% LU with QC Voice	Number of Wire Centers
0-10%	4
11-20%	14
21-30%	17
31-40%	22
41-50%	12
51-60%	1
61-70%	2
71-80%	0

These data are derived from confidential Living Unit data provided in an attachment to this response that is a worksheet in Excel file format entitled

MCC-007 Confidential Attachment A.

CenturyLink QC is not providing *MCC-007 Confidential Attachment A* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure.

Respondent: Robert Brigham, Regulatory Operations Director

MCC-008

Request: Please provide, in electronic spreadsheet or database format and in paper format, the number of total switched access lines and the number of residential access lines by census block as of December 31, 2013.

Response: The requested data are contained in an electronic spreadsheet in Excel file format entitled:

MCC-008 Confidential Attachment A.

This file provides the number of total switched access lines and the number of residential switched access lines by census block as of December 31, 2013, as contained in CenturyLinkQC's mapping database.

In order to provide the access lines by census block, CenturyLink QC had to perform additional processing of the mapping data. As a result, the count of access lines from the mapping database is close to but not exactly the same as the December 31, 2013 count of access lines shown on Schedule 23 of CenturyLink QC's 2013 annual report to the Montana PSC. A reconciliation of the difference follows:

	Total	Residential
Access lines per mapping database	142,395	73,579
Official Company access lines	5,107	
Access lines that cannot be mapped	286	
Un-reconciled difference	-38	-196
Access Lines Per Schedule 23	147,750	73,383

CenturyLink QC is not providing *MCC-008 Confidential Attachment A* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure. If printed, *MCC-008 Confidential Attachment A* would consume 452 pieces of paper. Accordingly, CenturyLink QC will provide *MCC-008 Confidential Attachment A* as an electronic spreadsheet only.

Respondent: Jacob Barlow, Regulatory Operations Manager

MCC-009

Request: Please provide every document or filing provided to the FCC or the Universal Service Administrative Company regarding any FCC universal program for the years 2005 through the present for both Qwest and for CenturyLink.

Objection: CenturyLink QC objects to this request on the grounds that some of the information it seeks is information that is not reasonably calculated to lead to the discovery of admissible evidence in this docket. In addition, the request is overly broad

and unreasonably burdensome. The request is for “every document or filing...regarding any FCC universal program.” The FCC provides universal service support through four mechanisms:

1. High Cost Support Mechanism provides support to certain qualifying telephone companies that serve high cost areas, thereby making phone service affordable for the residents of these regions.
2. Low Income Support Mechanism assists low-income customers by helping to pay for monthly telephone charges as well as connection charges to initiate telephone service.
3. Rural Health Care Support Mechanism allows rural health care providers to pay rates for telecommunications services similar to those of their urban counterparts, making telehealth services affordable.
4. Schools and Libraries Support Mechanism, popularly known as the "E-Rate," provides telecommunication services (e.g., local and long-distance calling, high-speed lines), Internet access, and internal connections (the equipment to deliver these services) to eligible schools and libraries.

Thus, the request asks for every report or filing made under these four mechanisms. In addition, the Low Income Support Mechanism, the Rural Health Care Support Mechanism and the Schools and Libraries Support Mechanism have no relevance to the issues in this docket. Accordingly, CenturyLink QC objects to providing information regarding these three federal universal service support mechanisms.

The request also seeks the requested information “for both Qwest and for CenturyLink.” Centurytel of Montana d/b/a CenturyLink (“CenturyLink”) is not a party to this docket and does not provide service in any of the areas that CenturyLink QC serves. This docket pertains to CenturyLink QC only. Accordingly, CenturyLink QC objects to providing reports filed by CenturyTel of Montana because they have no relevance to the issues in this docket.

Finally, although the issues in this docket pertain to Montana only, the request is not limited to information pertaining to Montana only. Accordingly, CenturyLink QC objects to providing any information that pertains to jurisdictions other than Montana.

Response: Notwithstanding the objection and without waiving it, CenturyLink QC is providing a total of 169 reports filed by CenturyLink QC with the FCC or the Universal Service Administrative Company regarding the FCC’s High-Cost Support Mechanism and the FCC’s Connect America Fund for the years 2005 through the present for the state of Montana. Please see attached MCC-009 Exhibits for filings (High Cost Model Support Exhibits 1 – 116, Interstate Access Support Exhibits 117 - 163, Form 481 Exhibits 164 - 166, and Rate Floor Exhibits 167 - 169 Filings) made with USAC, NECA & FCC for the requested period. Interstate Access Support and High Cost Model Support filings were required through 2011. Beginning 2012 in connection with the FCC’s Transformation Order, Connect America Fund reporting commenced.

CenturyLink QC has redacted certain confidential information in Exhibits 164 and 166 and is not providing that information with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure. CenturyLink QC has not determined how many sheets of paper would be consumed by printing all 169 attachments but is confident it would be more than 169 sheets. Accordingly, CenturyLink QC will provide these attachments electronically and will not provide printed copies of them.

Respondent: CenturyLink QC Legal and Ken Buchan, Manager, Regulatory Finance

MCC-010

Request: Please provide a state of Montana cash flow table for the years 2009 through 2013. Please provide the workpapers and underlying files in Excel or other electronic format.

Response: CenturyLink QC is unable to fulfill this request because CenturyLink QC does not account for cash flow by state, does not maintain balance sheets by state, does not prepare statements of cash flows by state and, therefore, does not have a cash flow table for Montana for any of the years requested.

Respondent: Phil Grate, Director Regulatory and Legislative Affairs, formerly Director Regulatory Finance.

MCC-011

Request: Please provide all Leadership scoreboard reports for every Montana exchange for 2013 and 2014 for CenturyLink QC. Please provide the workpapers and underlying files in Excel or other electronic format.

Response: The requested information is provided in two confidential attachments:

1. *MCC-011 Confidential Attachment A* is a worksheet in Excel file format containing the Vital Few Leadership Scorecard for every CenturyLink QC Montana exchange for 2013.
2. *MCC-011 Confidential Attachment B* is a worksheet in Excel file format containing the Vital Few Leadership Scorecard for every CenturyLink QC Montana exchange for 2014.

CenturyLink QC is not providing *MCC-011 Confidential Attachment A* and *MCC-011 Confidential Attachment B* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure. If printed, *MCC-011 Confidential Attachment A* and *MCC-011 Confidential*

Attachment B would consume more than 140 pieces of paper. Accordingly, CenturyLink QC will provide these attachments as electronic spreadsheets only.

Respondent: Phil Grate, Director Regulatory and Legislative Affairs

MCC-012

Request: Please provide an electronic wire center boundary map for the CenturyLink wire centers in the state of Montana in an ESRI Shape file or in a format that can be imported by an ERSI software package.

Response: *MCC-012 Attachment A* is a computer file that contains an electronic wire center boundary map for the CenturyLink wire centers in the state of Montana in an ESRI Shape file.

Respondent: Jacob Barlow, Regulatory Operations Manager

MCC-013

Request: Regarding your response to PSC 003, please provide all documents and work papers that support your \$20 per-foot estimate of the cost of replacing open wire.

Response: The \$20 per-foot estimate is based on the respondent's experience as an engineering and construction manager for CenturyLink and on the opinions he solicited from the engineers he supervises.

Prompted by this question, the respondent conducted an analysis of the average cost per foot of 80 CenturyLink Montana construction jobs closed in 2014 to place buried cable. The analysis shows the average cost for the 80 projects is \$11.53 per foot. The respondent and his engineers believe the cost per foot to replace open wire is likely to be substantially greater than \$11.53 per foot because open wire is more often located in remote areas where placement of cable can require placement through solid rock and cobble.

Respondent: Ronald Smith, Manager, Engineering and Construction

MCC-014

Request: Regarding your response to PSC 004, please provide all documents and work papers that support your \$157 million estimate of the cost of replacing analog carrier systems. Include in your response the locations and models of the switches that are not integrated. Include in your response an explanation of whether the technologies used to determine the cost estimate are compatible with the provisioning of Ethernet and VoIP services.

Response: The estimate includes the following cost components and amounts:

Cost Component	Amount
Interoffice Fiber	\$39,065,000
Rate Center Consolidation	19,100,000
Data Backhaul	300,000
Remote Terminals	5,792,000
Local Fiber	<u>92,780,000</u>
Total	\$157,037,000

MCC-014 Confidential Attachment A is a copy of the spreadsheet in Excel file format in which CenturyLink QC computed the \$157 million estimate. CenturyLink QC is not providing *MCC-014 Confidential Attachment A* with this March 6, 2015 response pending the granting of a protective order by the Montana PSC to protect this confidential data from public disclosure.

Respondents: Sue Spitze, Manager Local Network Planning and Capacity I, and Robert Larson, Director Local Network Planning



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing were served on March 6, 2015, in the manner shown and addressed as follows:

Hand delivered and via mail:

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bill.ballard@locationage.com

DATED this 6th day of March, 2015

A handwritten signature in black ink, appearing to read "Shelley Glueckert".
Shelley Glueckert