

Service Date: July 15, 2015

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 and Its Response to Notice of )  
Commission Action in Docket N2014.3.38, )  
Including Petition for Waiver of Admin. R. ) DOCKET NO. D2014.11.91  
Mont. 38.5.3371(7)(b) )

**DATA REQUESTS CTL-010 THROUGH CTL-016 OF  
QWEST CORPORATION d/b/a CENTURYLINK QC  
TO THE MISSOURI RIVER RESIDENTS FOR IMPROVED  
TELECOMMUNICATIONS SERVICE**

For purposes of the following questions "MRRITS" refers to the Missouri River Residents for Improved Telecommunications Services who are:

- Adrienne and John Kernaghan, 2808 Old US Highway 91;
- Virginia Jamruszka-Misner, 4810 Craig Frontage Road;
- Kathleen and James Ahrens, 4860 Craig Frontage Road; and
- Susan Maclin (Whitmire), 3260 Old US Highway 91).

**CTL-010**

At page 4 of Ms. Jamruszka-Misner's prefiled testimony, she asserts: "We pay top dollar for our CenturyLink landline service..."

- a. Define "top dollar" as Ms. Jamruszka-Misner uses the term.

DOCKET NO. D2014.11.91  
DATA REQUESTS CTL-010 THROUGH CTL-016

- b. Upon what facts does Ms. Jamruszka-Misner rely to assert that the amount MRRITS pay for CenturyLink landline service is “top dollar?”
- c. When Ms. Jamruszka-Misner wrote “We pay top dollar for our CenturyLink landline service...” was she aware of CenturyLink QC’s rates for voice service charged to:
  - 1. MRRITS and, separately,
  - 2. All the other residential customers in Montana?
- d. Is Ms. Jamruszka-Misner aware of what customers of other Incumbent Local Exchange Carriers pay for telephone service in rural areas of:
  - 1. Montana and, separately,
  - 2. Other states in the United States?

**CTL-011**

At page 4 of Ms. Jamruszka-Misner’s prefiled testimony, she asserts: “We pay top dollar for our CenturyLink landline service...”

- a. Is Ms. Jamruszka-Misner aware of how CenturyLink QC’s rates for voice service available to the named MRRITS compare with the voice service rates paid by voice service customers of urban areas of the United States?
- b. When Ms. Jamruszka-Misner wrote “We pay top dollar for our CenturyLink landline service...” was she aware of the extent to which CenturyLink QC’s rates for voice service in rural areas of Montana have decreased over the past 25 years?
- c. Does Ms. Jamruszka-Misner know for a fact whether the revenues CenturyLink QC generates from the MRRITS exceed the cost of providing the MRRITS the voice service they receive from CenturyLink?
- d. If the facts were that the revenues CenturyLink QC generates from the MRRITS in the upper Missouri River valley of Montana are substantially less than CenturyLink QC’s cost of providing the MRRITS voice would Ms. Jamruszka-Misner still maintain that “We pay top dollar for our CenturyLink landline service...”?

**CTL-012**

At page 4 of Ms. Jamruszka-Misner's prefiled testimony, she asserts: "Our hands are tied – We have to pay for dismal service because there is no other telephone service option."

- a. Does Ms. Jamruszka-Misner have any factual reason to believe that commercial satellite voice service is unavailable for purchase by any of the MRRITS?
- b. If so, why is commercial satellite voice service unavailable for purchase by any of the MRRITS?
- c. Is commercial satellite voice service unavailable for purchase by Ms. Jamruszka-Misner?
- d. If the answer to "c" is "yes," why does Ms. Jamruszka-Misner not buy commercial satellite voice service instead of voice service from Centurylink QC?
- e. What price would Ms. Jamruszka-Misner be charged for commercial satellite voice service?

**CTL-013**

At page 4 of Ms. Jamruszka-Misner's prefiled testimony, she asserts: "Our hands are tied – We have to pay for dismal service because there is no other telephone service option." To the extent Ms. Jamruszka-Misner knows, for each named MRRITS please provide the following information:

- a. Does the named MRRITS currently obtain telecommunications services (including but not limited to voice and/or internet service) through a satellite in orbit around the earth?
- b. If so,
  1. Please describe the service or services the named MRRITS obtains through a satellite in orbit around the earth.
  2. Please state the amount the MRRITS is billed for the service or services.

DOCKET NO. D2014.11.91  
DATA REQUESTS CTL-010 THROUGH CTL-016

3. For Ms. Jamruszka-Misner only, please provide copies of the most recent 12 months of bills for such service or services.
- c. Does Ms. Jamruszka-Misner understand why no provider except CenturyLink QC and commercial satellite companies offers voice service in the areas where the MRRITS reside in the upper Missouri River valley of Montana? If so, please explain Ms. Jamruszka-Misner's understanding of the reason why no provider except CenturyLink QC and commercial satellite companies offers voice service where the MRRITS reside.

**CTL-014**

At page 5 of Ms. Jamruszka-Misner's prefiled testimony, she asserts: "CenturyLink has to upgrade the telephone system and equipment to provide reliable telephone service to its customers."

- a. Would Ms. Jamruszka-Misner be willing to pay CenturyLink QC as a contribution in aid of construction her proportionate share of the full cost of the telephone equipment and system?
  1. If not, why not?
  2. If not, how does Ms. JamruszkaMisner propose that CenturyLink QC recover her proportionate share of the full cost, including financing, of the telephone equipment and system?
- b. To the extent Ms. Jamruskza-Misner knows, would the other customers served by the upgraded system and equipment be willing to pay CenturyLink QC as a contribution in aid of construction their proportionate share of the full cost of the equipment and system?
  1. If not, why not?
  2. If not, how does Ms. JamruszkaMisner expect CenturyLink QC to recover the full cost of the telephone equipment and system including the cost of financing?

**CTL-015**

At page 5 of Ms. Jamruszka-Misner's prefiled testimony, she asserts: "If CenturyLink continues to refuse to take meaningful steps to improve rural service, we urge the Commission to stop their flow of Universal Service Funds."

- a. At the time she wrote this testimony were the "Universal Service Funds" to which Ms. Jamruszka-Misner was referring Connect America Fund Phase I Frozen High Cost Support?
- b. If not, to what was Ms. Jamruszka-Misner referring when she spoke of "their flow of Universal Service Funds."?
- c. What is Ms. Jamruszka-Misner's understanding of how CenturyLink QC's is obligated to use Connect America Fund Phase I Frozen High Cost Support (hereinafter "FHCS")?
- d. When she wrote this testimony was Ms. Jamruszka-Misner aware of a memo dated May 11, 2015 from PSC Staffer Gary Duncan to the PSC Commissioners and others in which Mr. Duncan concluded: "After examining the information submitted by CenturyLink regarding its use of FHCS, staff concludes they have probably complied with the FCC's rule regarding use of FHCS."

**CTL-016**

At page 5 of Ms. Jamruszka-Misner's prefiled testimony, she asserts: "If CenturyLink continues to refuse to take meaningful steps to improve rural service, we urge the Commission to stop their flow of Universal Service Funds."

- a. Does Ms. Jamruszka-Misner contend that CenturyLink QC is not in compliance with the FCC's rules regarding the use of FHCS?
- b. If so, what rule or rules does Ms. Jamruszka-Misner contend CenturyLink QC is violating and on what facts does Ms. Jamruszka-Misner rely for that contention?

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of the foregoing were served on July 15, 2015, electronically and by us mail, addressed as follows:

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