

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

RECEIVED

JAN 09 2015

MONT. P.S. COMMISSION

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)
the Montana Public Service Commission for)
CenturyLink Service Quality Information) DOCKET NO. N2014.4.38

MOTION FOR RECONSIDERATION

1.

Qwest Corporation d/b/a CenturyLink ("CenturyLink"), by and through counsel undersigned, submits this *Motion for Reconsideration* to the Montana Public Service Commission ("Commission"). In this motion, filed pursuant to A.R.M. §§ 38.2.4806,¹ CenturyLink respectfully asks the Commission to reconsider its decisions in Order No. 7388.

2.

The person to be contacted regarding this motion is Mr. William E. Hendricks at Tre.Hendricks@CenturyLink.com or (541) 387-9439 or mobile (541) 400-8421.

¹ CenturyLink notes that the rule provides that reconsideration "is not available in regard to the granting of a motion for protective order." In this case, the Commission has denied CenturyLink's motion for protective order and the Orders are therefore reviewable under the rule.

3.

CenturyLink seeks reconsideration of only a portion of the Commission's decision in the Order. CenturyLink asks the Commission in the Motion to protect a more limited set of data and submits a revised redacted version of the presentation in Attachment B. CenturyLink seeks protection only of data that shows (1) Out of Service Cleared within 24 Hours ("OOS 24) service quality metric data by wire center; (2) the percent of Living Units served by CenturyLink QC by wire center; and (3) the number of installation technicians in each CenturyLink QC garage and the number of additional technicians needed to meet the OOS 24 metric in each wire center. See Attachment A, Affidavit of Robert H. Brigham at ¶ 4.

BACKGROUND

4.

On October 23, 2014, CenturyLink filed a Motion for Protective Order ("Motion"), seeking protection of data that CenturyLink included in an oral presentation to the Commission on October 17, 2014. CenturyLink narrowly tailored the Motion, seeking protection for only the most sensitive information.

5.

The Commission noticed the Motion in the Regulatory Division Agenda. No intervenor or member of the public objected to or otherwise commented on the Motion. On December 30, 2014, the Commission entered Order No. 7388 ("Order"), which denied the Motion.

ARGUMENT

6.

The Order appears to deny the Motion on two grounds. First, the Order states that the "Commission has not protected aggregate service quality information in the past, only wire center information." Order, at ¶ 24. The

Commission also states that “CenturyLink does not indicate the service quality information is by wire center.” *Id.* CenturyLink has removed from consideration data that is not wire center specific and this data is now provided as public in Attachment B. All of the wire center-specific (and garage-specific) information for which CenturyLink seeks protection is redacted in Attachment B.

7.

Second, the Order states: “the Commission fails to understand how personnel deployment by wire center could lead to a competitive advantage, or exploitation of potential weaknesses in the CenturyLink network which would lead to a security risk for that network.” *Id.* There are two reasons that this information should be maintained as confidential. First, competitors could ascertain from the information (how many technicians are in each garage and how many are needed to meet the OOS standard) the quality of CenturyLink’s service in specific areas and target those areas for marketing and deployment of their own services. Second, providing the information publicly could compromise the security of CenturyLink’s network. A party seeking to harm CenturyLink’s network could use the information to determine where the weakest points in the network are and target criminal acts in those areas.

REQUEST FOR RELIEF

8.

CenturyLink therefore respectfully requests that the Commission reconsider its decision in the Order and grant CenturyLink's request for a protective order for the information that is presented as redacted in Attachment B.

DATED this 9th day of January 2015.

GOUGH, SHANAHAN, JOHNSON & WATERMAN, PLLP

By: 
for Peter G. Scott, Attorneys for CenturyLink QC

Attachment A – Affidavit of Robert H. Brigham
Attachment B – Revised Redacted Presentation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing were served on January 9, 2015, in the manner shown and addressed as follows:

Via E-Mail and mail:

Kate Whitney, Administrator
Utility Division
Montana Public Service Commission
1701 Prospect Avenue,
P.O. Box 202601
Helena, MT 59620-2601
kwhitney@mt.gov

Phil Grate, Director Montana
Regulatory and Legislative Affairs
1600 7th Avenue, 15th Floor
Seattle WA 98191
phil.grate@centurylink.com

Monica Tranel, Esq.
Montana Consumer Counsel
PO Box 201703
111 North Last Chance Gulch,
Suite 1B
Helena MT 59620-1703
mtranel@mt.gov

Jason Williams, Esq.
Sr. Vice President and G. Counsel
Blackfoot Telephone Cooperative
1221 North Russell Street
Missoula MT 58808
jwilliams@blackfoot.com

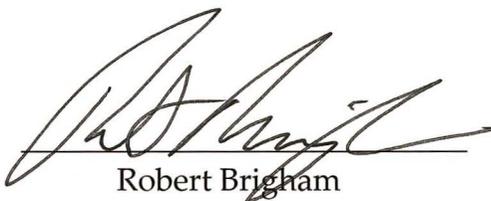
Geoff Feiss, General Manager
Montana Telecomm Association
208 North Montana Avenue,
Suite 105
Helena MT 59601
gfeiss@telecomassn.org

Dennis R. Lopach, PC
4 Carriage Lane
Helena MT 59691
Dennis.lopach@gmail.com

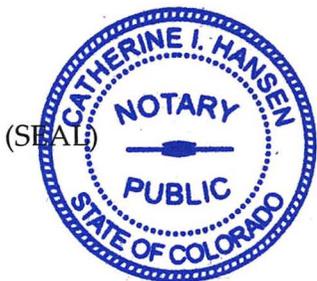
Information. Any hard copies of the Information are marked as confidential and destroyed after use.

4. The Information described in the accompanying *Motion for Reconsideration* consists of: (1) Out of Service Cleared within 24 Hours ("OOS 24) service quality metric data by wire center; (2) Data showing the percent of Living Units served by CenturyLink QC by wire center; (3) Data showing the number of installation technicians in each CenturyLink QC garage and the number of additional technicians needed to meet the OOS 24 metric in each wire center. The Information contains sensitive data about CenturyLink QC's operations to which competitors do not have access.
5. The telecommunications industry in Montana is highly competitive and service providers aggressively market their products and services. Possession of the Information for which protection is sought would give CenturyLink QC's competitors a detailed view of: (1) CenturyLink's performance on the OOS 24 metric for each wire center; (2) the percentage of Living Units served by CenturyLink QC in each wire center and (3) the deployment of CenturyLink personnel in each garage in Montana. Possession of this data would provide competitors with knowledge of CenturyLink's operations that would provide a distinct competitive advantage, allowing competitors to target marketing efforts to identified persons or groups of persons in identified geographic areas of the state. The Commission previously granted protection of OOS 24 metric performance data by wire center in its November 24, 2014 Order in Docket N2014.4.38 and granted protection of Living Unit data by wire center in its January 22, 2014 Order in Docket D2013.11.78.
6. To the best of my knowledge the Information for which protection is sought is routinely protected in other state and federal jurisdictions where CenturyLink QC has provided detailed service quality, living unit and personnel deployment information and reports.
7. Prior to filing the information, CenturyLink QC considered the constitutional presumption in favor of disclosing materials provided to the MPSC. Based on my experience and having fully considered the factual and legal bases required for the protection of confidential information, I have, with the assistance of qualified legal counsel, formed a good faith belief that the Information described in the accompanying Motion for a Protective Order are trade secrets that may be protected from public disclosure under the law.

Dated: January 7, 2015


Robert Brigham

SUBSCRIBED AND SWORN TO, before me, this 7th day of January 2015.




Notary Public for the State of Colorado
Print Name: Catherine I. Hansen
Residing at: Denver, CO
My Commission Expires: 7/25/2016

Service Quality Metrics

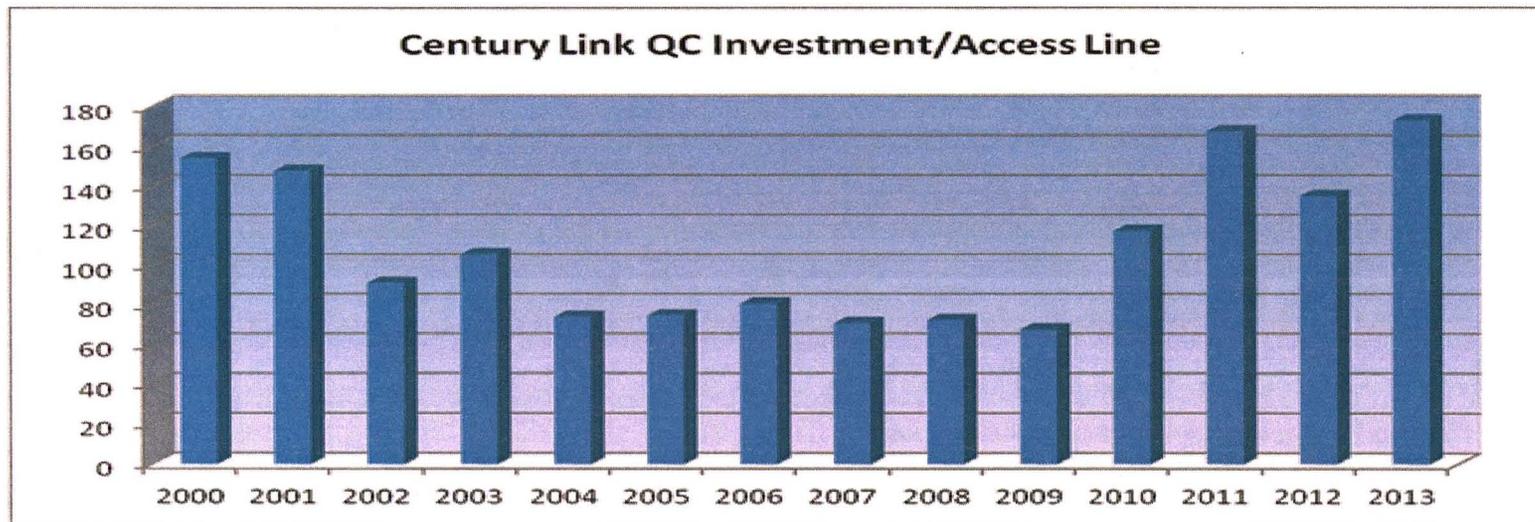
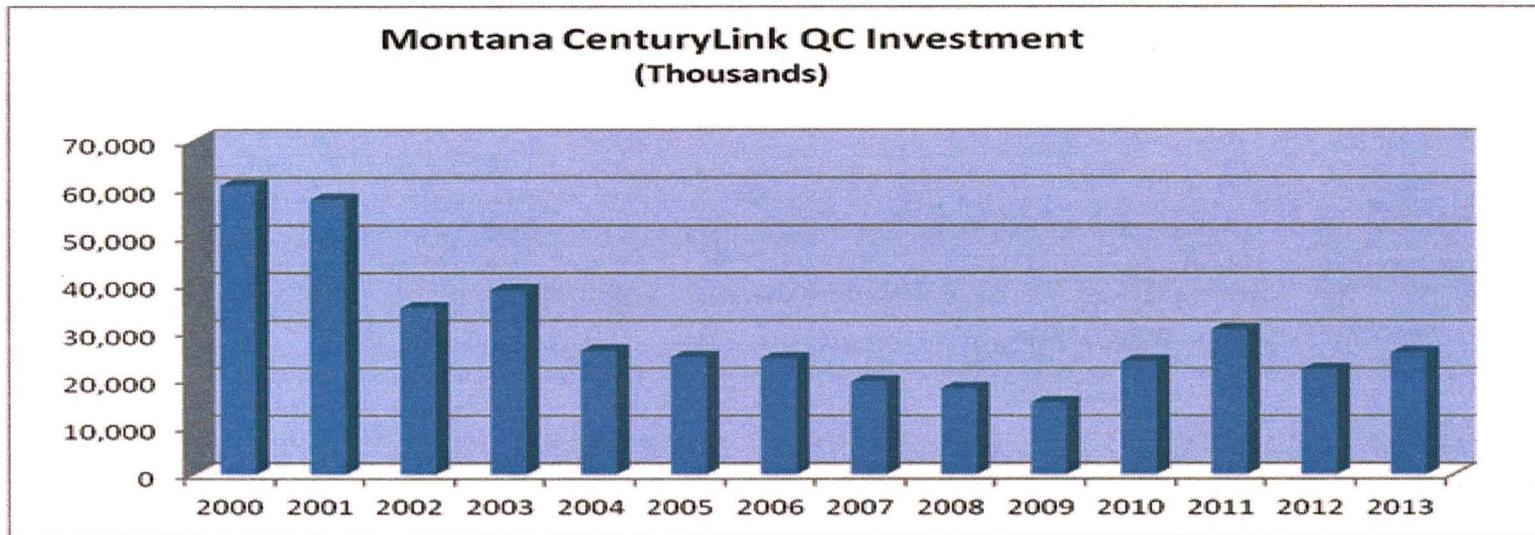
Issues in Today's Montana Marketplace

tabbles®
EXHIBIT
B



CenturyLink QC continues to invest in Montana

Since 2000, CenturyLink QC has invested over \$420 million in its Montana network and has increased per line investment



Investment Since Qwest Transaction

Day 1 Qwest Transaction - Zero customers fed with FTTN...

Since then:

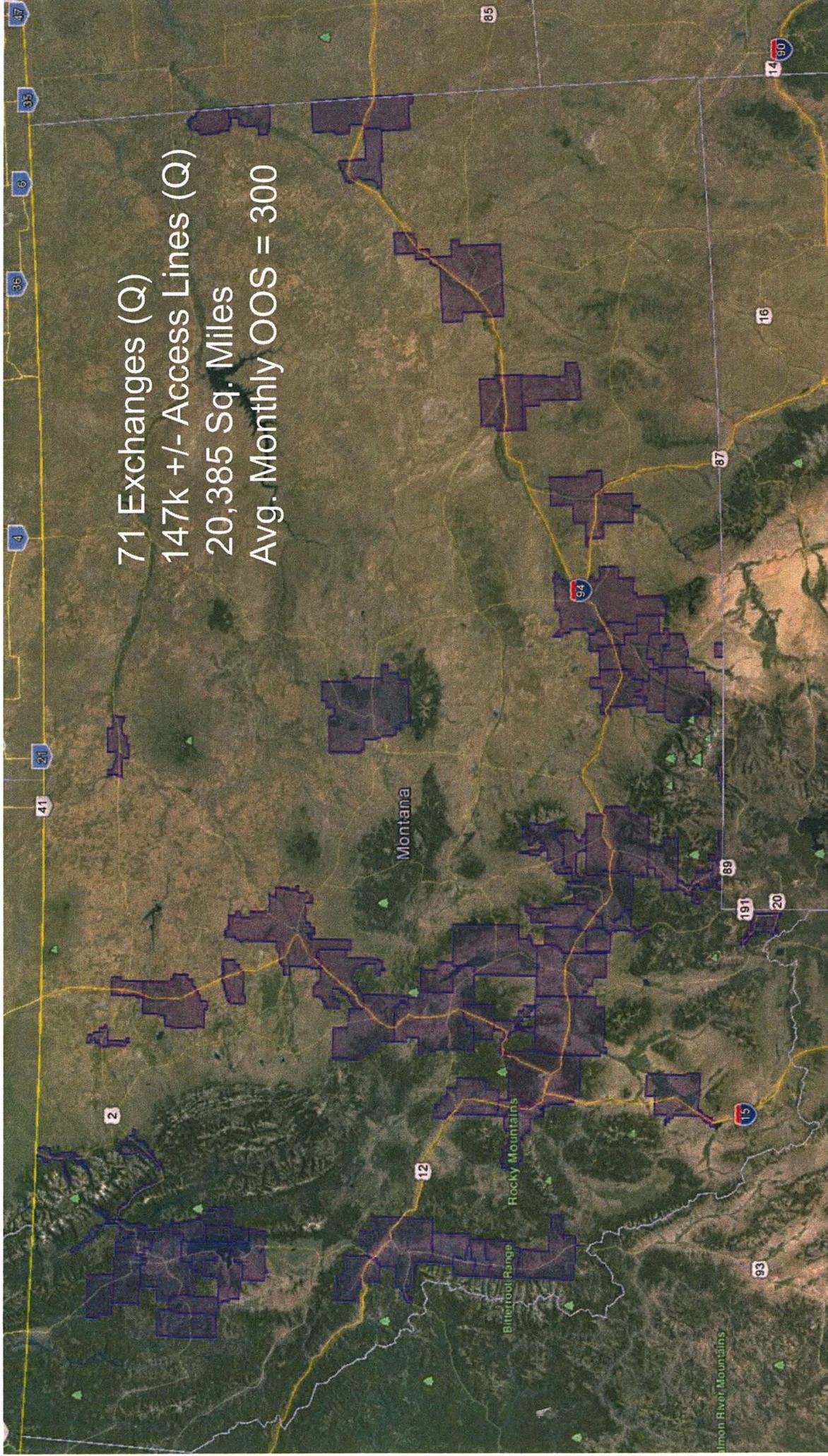
- We have deployed 230 FTTN locations in Montana
 - 40 Meg- 21,504 Households
 - 20 Meg- 15,891 Households
 - 12 Meg- 12,294 Households
 - 7 Meg- 4,690 Households
- COIP- Deployed in all Exchanges
 - 953 X boxes across Montana
 - 20 Meg- 3,355 Households
 - 12 Meg- 45,685 Households
 - 7 Meg- 33,960 Households
- Bonded Solution by End of year
 - 40 Meg- 41,201 Households
 - 20 Meg- 105,933 Households
 - 12 Meg- 46,089 Households
 - 7 Meg- 58,875 Households
- ***193,223 Households with Fiber fed services (FTTN/COIP)***

Investment Since Qwest Transaction

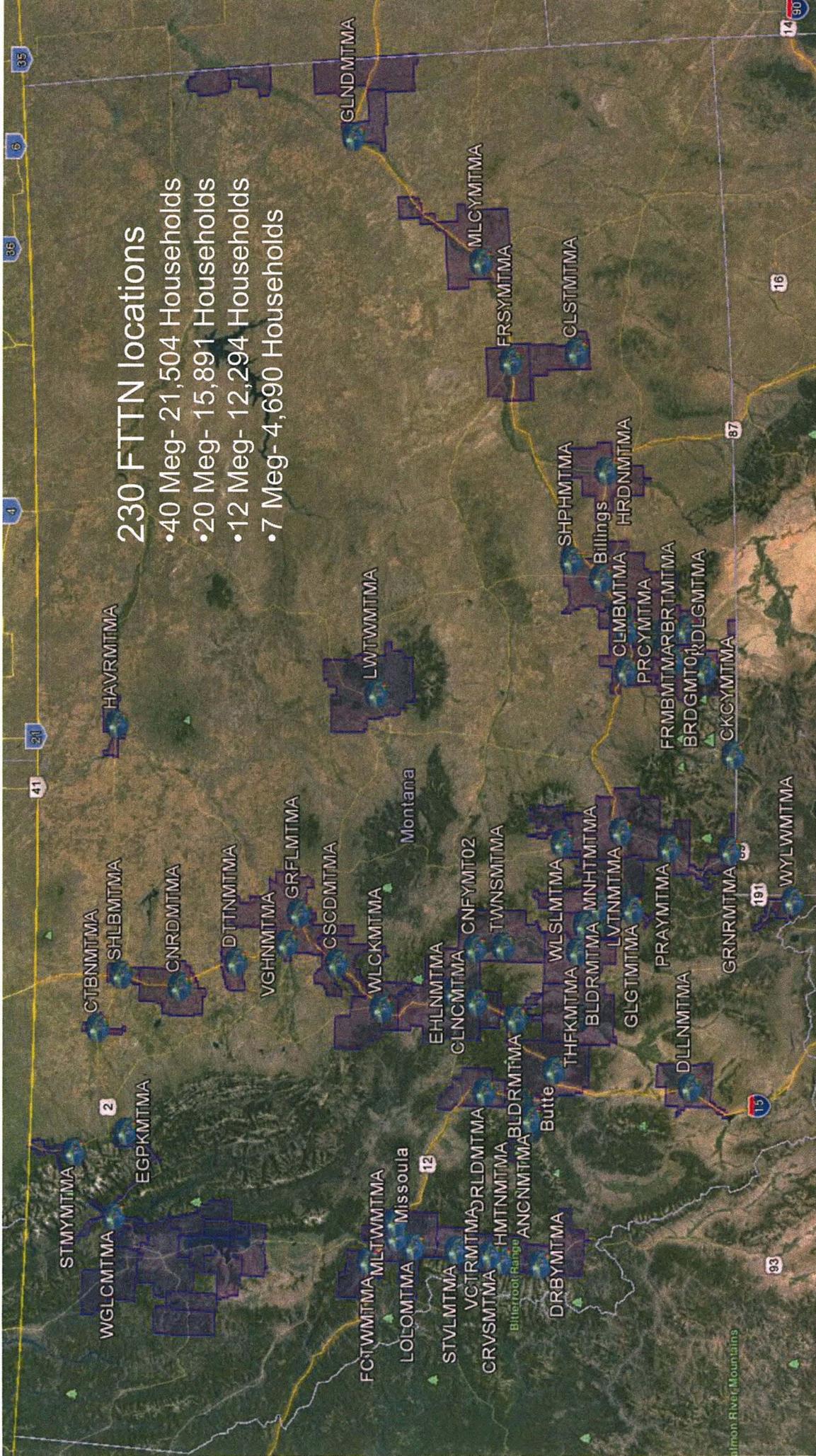
- Fiber To The Home (FTTH)
 - 37 New developments in 2014
 - 3200+ Homes
 - Gigabit capable homes....Minimum speed is 20 Meg.
- Fiber to the Business
 - In process of deploying solutions for gigabit to the business in MTU type buildings across the state...
- Fiber To The Cell Tower
 - 144+ Locations across the state
 - This enables 4G....Impact= 90+% of Montanans

CenturyLink has invested in the future throughout Montana

71 Exchanges (Q)
147k +/- Access Lines (Q)
20,385 Sq. Miles
Avg. Monthly OOS = 300



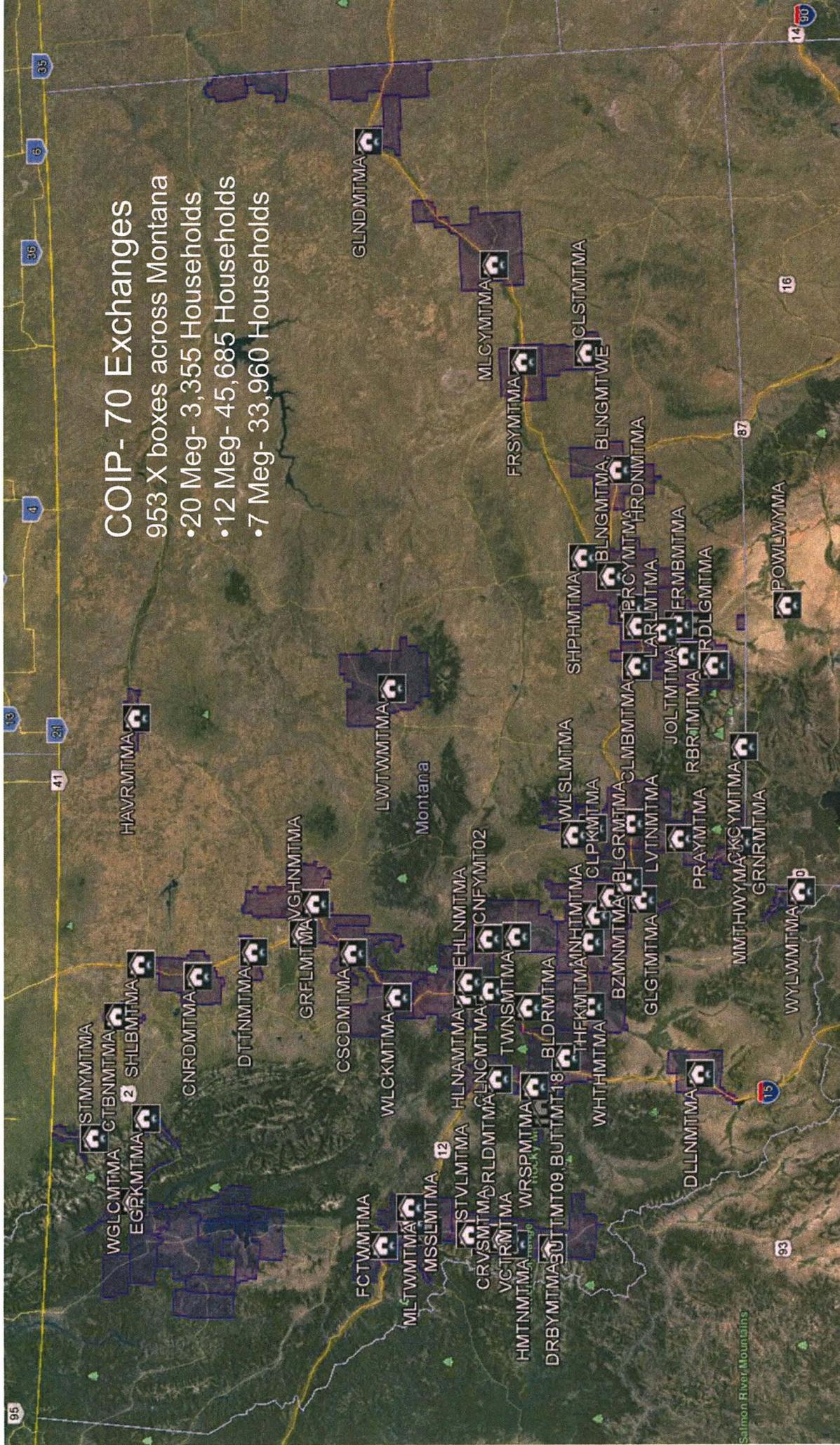
CenturyLink has invested in the future throughout Montana



CenturyLink has invested in the future throughout Montana

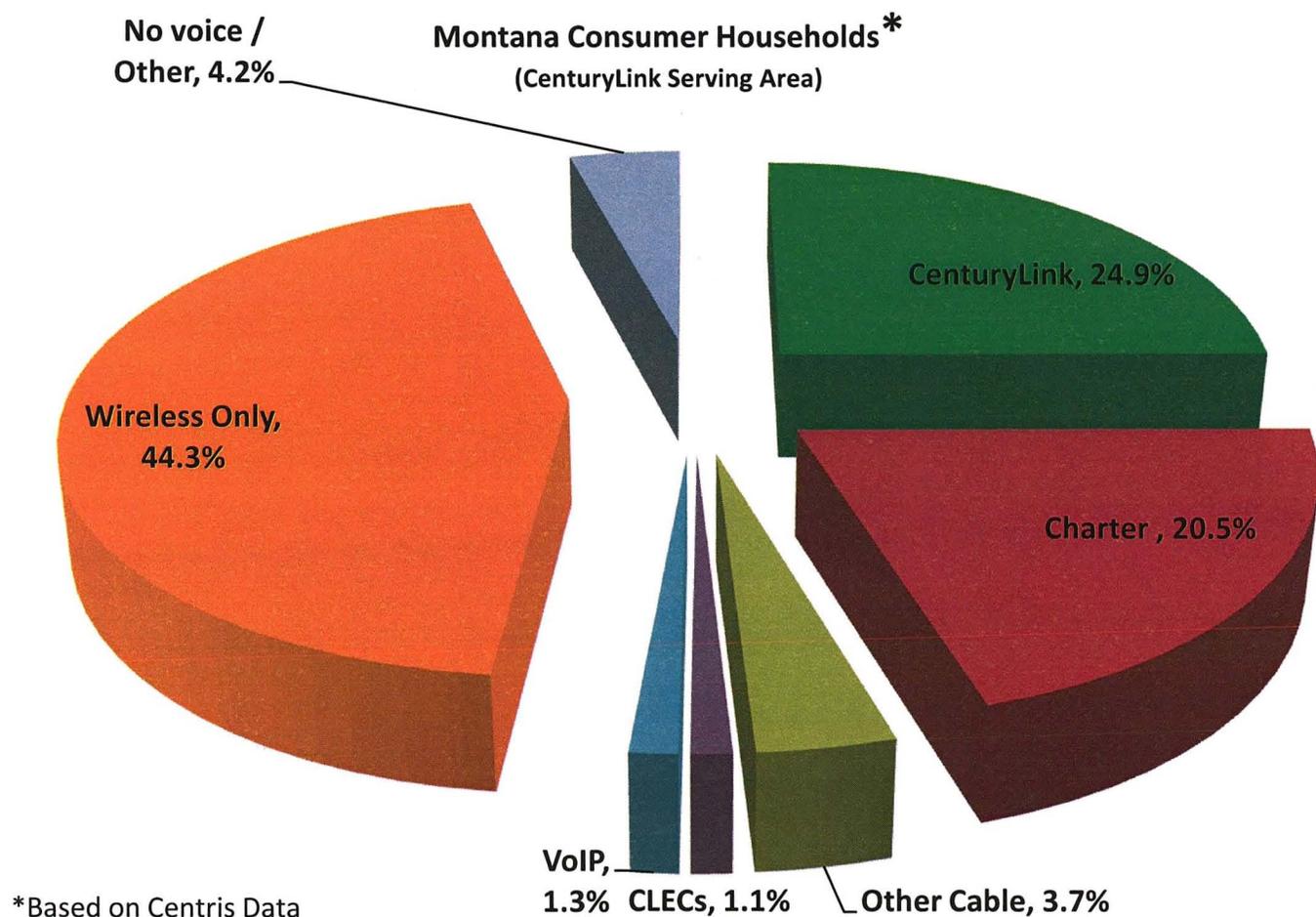
COIP- 70 Exchanges
 953 X boxes across Montana

- 20 Meg- 3,355 Households
- 12 Meg- 45,685 Households
- 7 Meg- 33,960 Households



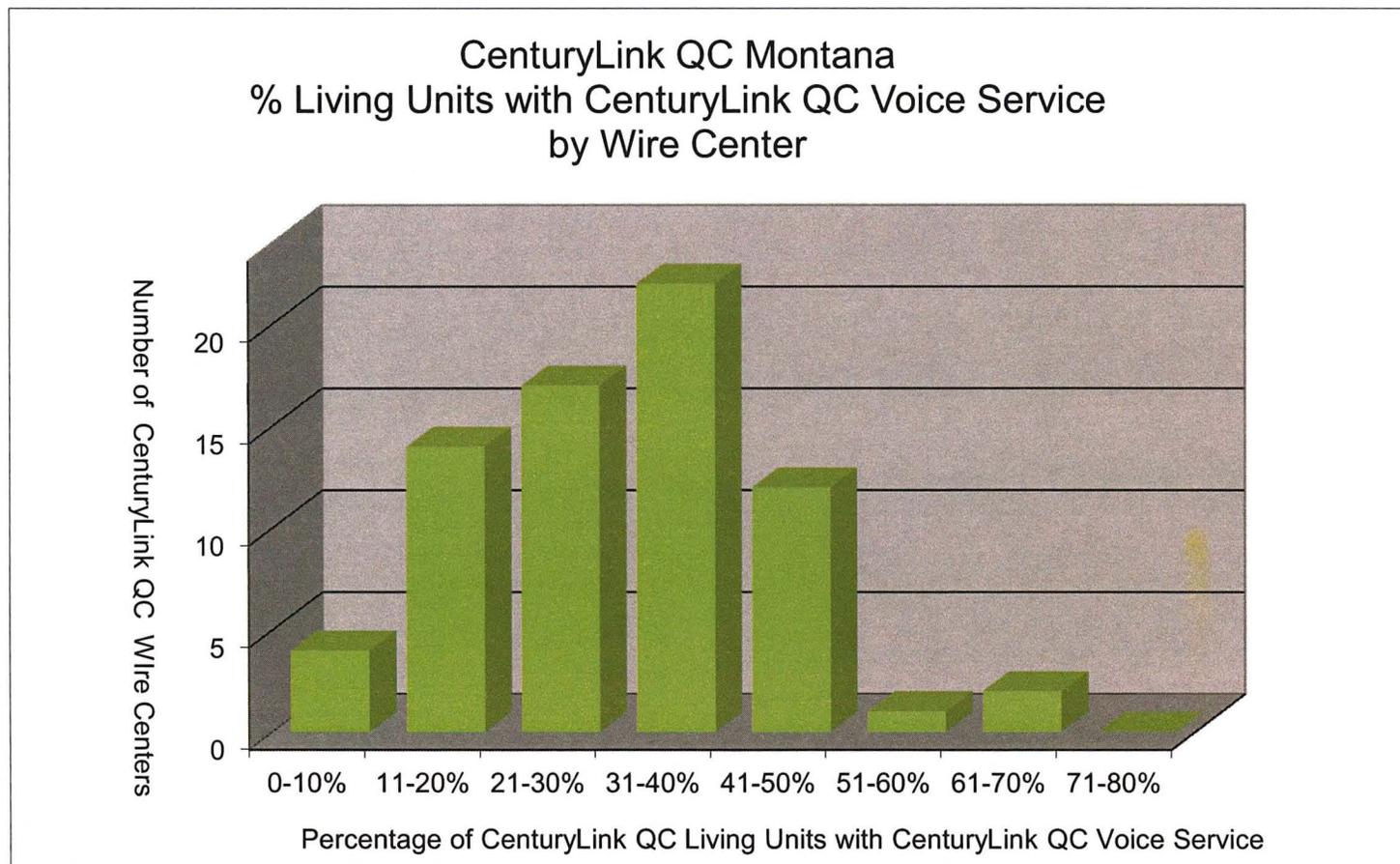
Competition has reduced CenturyLink's scale

In the entire CenturyLink serving area, the company provides voice service to less than 25% of consumer households.



CenturyLink QC Living Unit Penetration is Low

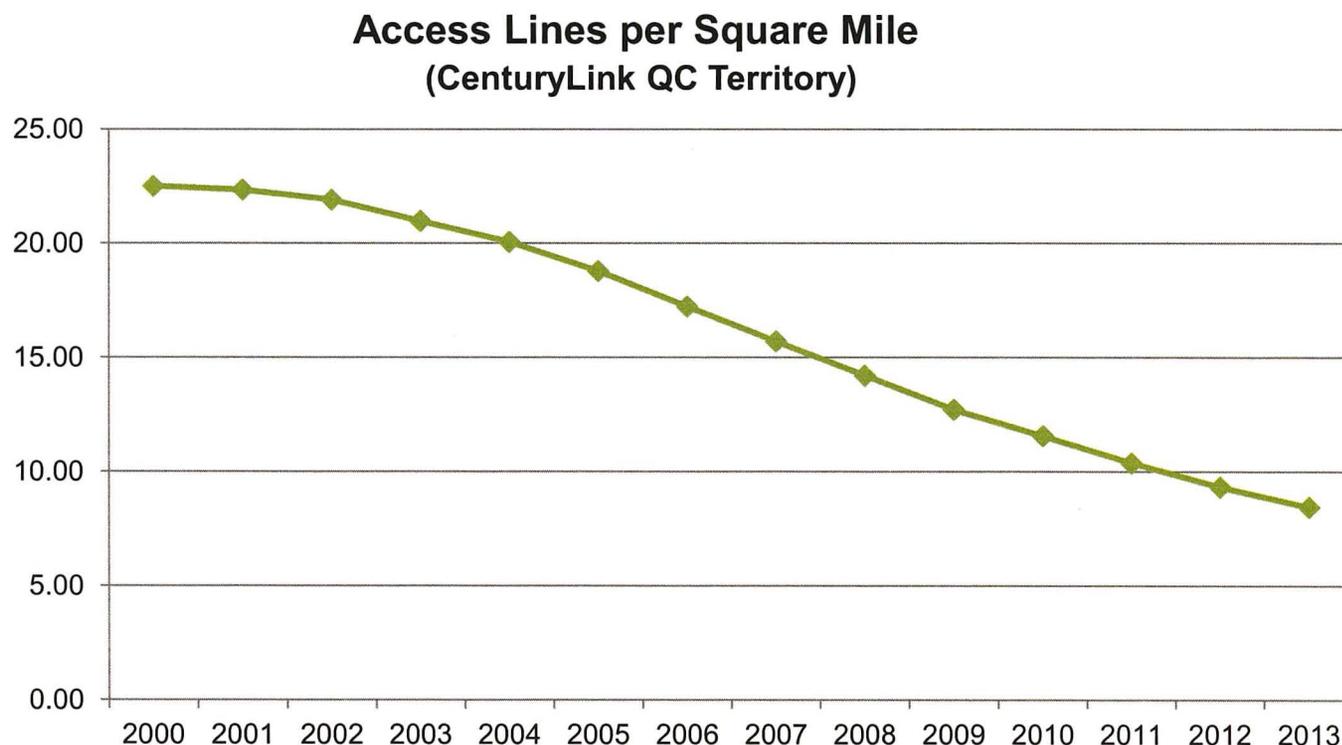
In aggregate, CenturyLink QC is now providing voice service to less than 22% of the Living Units to which it has facilities and is “ready to serve.” Thus, ***more than three quarters of the Living Units that CenturyLink QC could serve in Montana purchase voice services from a competitive provider.***



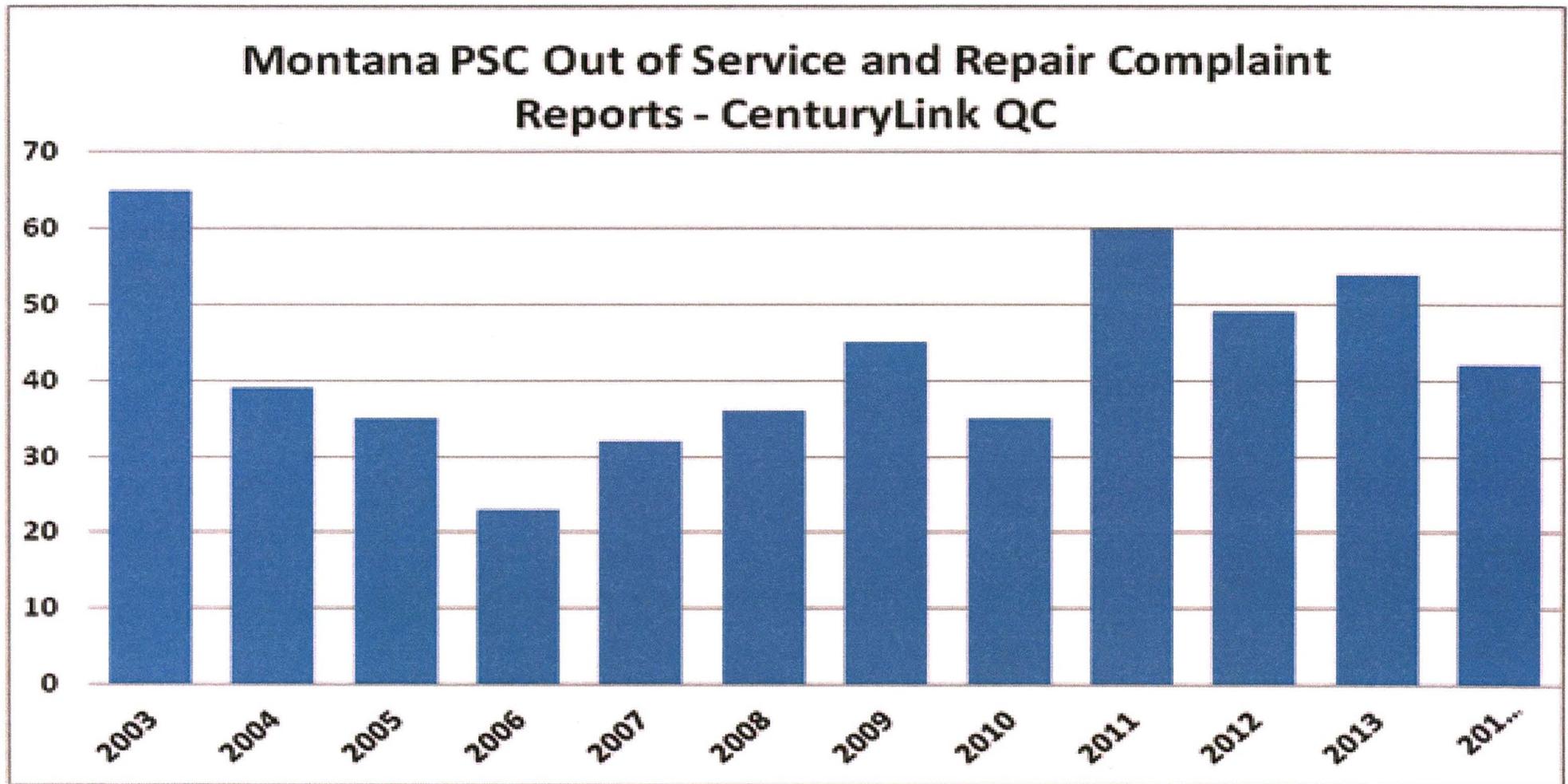
Declining customer density is a significant challenge

When the OOS restoral benchmark was established in Montana (1989), CenturyLink served nearly every household (Living Unit) in its serving area.

Competition has led to a nearly 2/3 reduction in the number of customers served per square mile from 22.5 to 8.4 lines per square mile.



Customer Complaints to the Commission



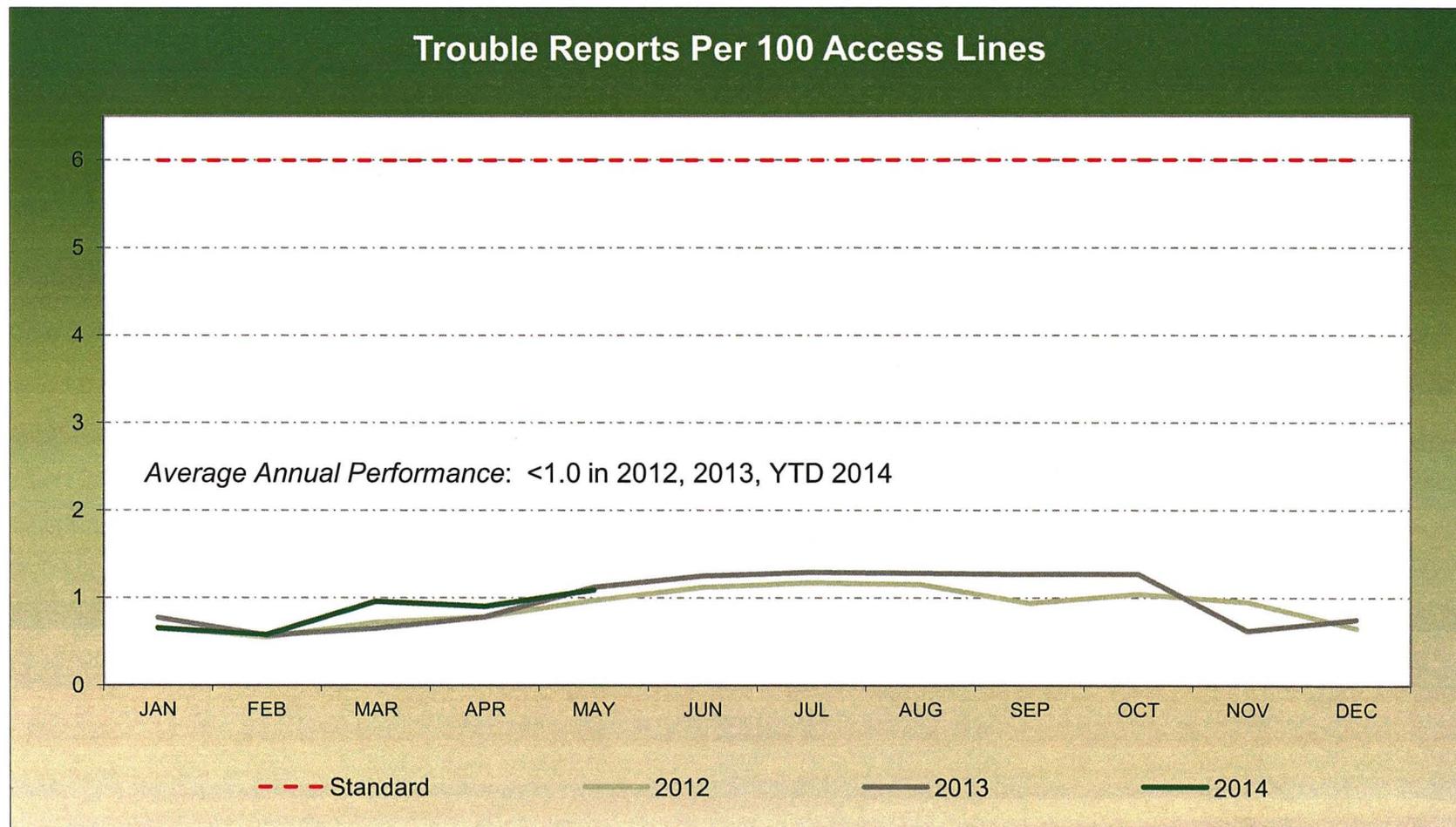
*****Confidential*****



CenturyLink®

Trouble Report rate has remained consistently low

Even as access lines have declined, the average number of trouble reports per 100 access lines has remained near or below 1.0 — far below the 6.0 standard:



The Out of Service challenge

- CenturyLink QC has not met the OOS<24 standard for the years 2012, 2013 and 2014.

	(a) Total TR	(b) OOS TR	(c) OOS Cleared<24	(d) % TR that are OOS (b)/(a)	(e) Avg. OOS/Mo (b)/12 or (b)/8
2012	14,561	5,012	2,876	34.4%	418
2013	13,971	4,637	2,670	33.2%	386
2014 (8 mo.)	8,148	2,835	1,408	34.8%	354

- CenturyLink's investment in modern network and technicians has positively impacted service.
- Fewer customers are experiencing troubles and out of service conditions.** The average number of outages per month has declined 15% in two years from 418 in 2012 to 354 in 2014.
- Outages impact **1/3 of 1%** of Montana customers on a monthly basis.
- In August 2014, **15%** of outages were related to Carrier Systems.

Tech Costs Estimate

CenturyLink's Annual Cost Per Technician

Wages and benefits		\$80,000
Truck and equipment		
Purchase price	\$80,000	
Service life in years	6	
Annual truck depreciation		\$13,333
Annual truck maintenance		\$2,000
Additional miles per year	12,000	
Miles per gallon	<u>10</u>	
Gallons of fuel	1,200	
Price per gallon	\$3.89	
Annual truck fuel		<u>\$4,667</u>
		\$100,000

Glendive

Glendive

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
30	Fairview	209	135	35%	74	2%
37	Glendive	2,275	798	65%	1,477	33%
2	68 Sidney	3,073	378	88%	2,695	61%
73	Terry	79	21	73%	58	1%
84	Wibaux	241	91	62%	150	3%
		5,877	1,423	76%	4,454	100%

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
FAIRVIEW			
GLENDIVE			
SIDNEY			
TERRY			
WIBAUX			
Total			

	Access Lines	No of Techs	Techs per AL
Current	1,423		
Required to meet standard	1,423		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Additional cleared in 24 hrs annually to meet 90% std

Miles City

Miles City

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Total of Access Lines Lost	Percent to Total of Access Lines Lost
	16 Colstrip	1,403	735	48%	668	8%
1	32 Forsyth	1,573	175	89%	1,398	18%
	55 Miles City	6,797	905	87%	5,892	74%
		9,773	1,815	81%	7,958	100%

2012			2013			Thru July 2014			Annual Aveage		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24
Additional cleared in 24 hrs annually to meet 90% std											

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
COLSTRIP			
FORSYTH			
MILES CITY			
Total			

	Access Lines	No of Techs	Techs per Access Line
Current	1,815		
Required to meet standard	1,815		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Billings

BILLINGS

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
	9 Bridger	673	384	43%	289	1%
	34 Fromberg	414	253	39%	161	0%
	40 Hardin	2,517	1,351	46%	1,166	2%
17	61 Park City	818	407	50%	411	1%
	67 Shepherd	1,617	862	47%	755	1%
	5 Billings Main	51,106	15,907	69%	35,199	67%
	6 Billings West	23,206	8,634	63%	14,572	28%
		80,351	27,798	65%	52,553	100%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

BRIDGER
FROMBERG
HARDIN
PARK CITY
SHEPHERD
BILLINGS MAIN
BILLINGS WEST

LU's	QC	%QC

Access Lines	No of Techs	Techs per Access Line

Current
Required to meet standard
Additional techs required

27,798
27,798

Annual cost per tech

\$100,000

Total annual cost to meet standard

Additional cleared in 24 hours annually to meet 90% standard

Cost per additional clearance

Red Lodge

Red Lodge

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
	45 Joliet	1,092	709	35%	383	22%
1	64 Red Lodge	3,133	1,853	41%	1,280	72%
	65 Roberts	358	253	29%	105	6%
		4,583	2,815	39%	1,768	100%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

	LU's	QC	%QC
JOLIET			
RED LODGE			
ROBERTS			
Total			

	Access Lines	No of Techs	Techs per AL
Current	2,815		
Required to meet standard	2,815		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Columbus

Columbus

					2012			2013			Thru July 2014			Annual Average			
No of Techs	Exchanges Served		EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24
1	18	Columbus	2,016	1,191	41%												

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

COLUMBUS

LU's	QC	%QC

Access Lines	No of Techs	Techs per Access Line

Current	1,191	
Required to meet standard	1,191	
Additional techs required		
Annual cost per tech	\$100,000	
Total annual cost to meet standard		
Additional cleared in 24 hours annually to meet 90% standard		
Cost per additional clearance		

Laurel

Laurel

					2012			2013			Thru July 2014			Annual Average			
No of Techs	Exchanges Served		EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24
1	48	Laurel	4,908	1,989	59%												

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

	LU's	QC	%QC
LAUREL			

	Access Lines	No of Techs	Techs per Access Line
Current	1,989		
Required to meet standard	1,989		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Cooke City

Cooke City

Cooke City					2012			2013			Thru July 2014			Annual Aveage			
No of Techs	Exchanges Served		EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24
1	20	Cooke City	258	316	-22%												

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

COOKE CITY

LU's	QC	%QC

Access Lines	No of Techs	Techs per Access Line
316		
316		

Current	316	
Required to meet standard	316	
Additional techs required		
Annual cost per tech		\$100,000
Total annual cost to meet standard		
Additional cleared in 24 hours annually to meet 90% standard		
Cost per additional clearance	23	



Livingston

Livingston

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
15	Clyde Park	539	473	12%	66	1%
50	Livingston	7,479	2,961	60%	4,518	85%
4	63 Pray	917	627	32%	290	5%
85	Wilsall	402	396	1%	6	0%
36	Gardiner	1,140	678	41%	462	9%
		10,477	5,135	51%	5,342	100%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
CLYDE PARK			
LIVINGSTON			
PRAY			
WILSALL			
GARDINER			
TOTAL			

	Access Lines	No of Techs	Techs per AL
--	--------------	-------------	--------------

Current	5,135		
Required to meet standard	5,135		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Additional cleared in 24 hrs annually to meet 90% std

Bozeman

Bozeman

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss
5	8 Bozeman	33,714	13,587	60%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

	LU's	QC	%QC
BOZEMAN	35,655	7,637	21.4%

	Access Lines	No of Techs	Techs per Access Line
Current	13,587		
Required to meet standard	13,587		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Manhattan

Manhattan

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss
3	52 Manhattan	1,267	579	54%

2012			2013			Thru July 2014			Annual Aveage		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

MANHATTAN

LU's	QC	%QC

Access Lines	No of Techs	Techs per Access Line

Current	579	
Required to meet standard	579	
Additional techs required		
Annual cost per tech		\$100,000
Total annual cost to meet standard		
Additional cleared in 24 hours annually to meet 90% standard		
Cost per additional clearance		

Belgrade

Belgrade

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
	3 Belgrade	6,801	2,948	57%	3,853	74%
1	35 Gallatin Gateway	1,156	751	35%	405	8%
	1 Amsterdam	868	590	32%	278	5%
	74 Three Forks	1,747	1,067	39%	680	13%
		10,572	5,356	49%	5,216	100%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

BELGRADE

GALLATIN GATEWAY

AMSTERDAM

THREE FORKS

Total

LU's	QC	%QC

Access Lines	No of Techs	Techs per AL
5,356		
5,356		

Current

Required to meet standard

Additional techs required

Annual cost per tech

Total annual cost to meet standard

Additional cleared in 24 hours annually to meet 90% standard

Cost per additional clearance

West Yellowstone

West Yellowstone

West Yellowstone					2012			2013			Thru July 2014			Annual Average			
No of Techs	Exchanges Served		EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24
1	81 West Yellowstone		2,083	1,341	36%												

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

LU's	QC	%QC

WEST YELLOWSTONE

Access Lines	No of Techs	Techs per Access Line
Current	1,341	
Required to meet standard	1,341	
Additional techs required		
Annual cost per tech	\$100,000	
Total annual cost to meet standard		
Additional cleared in 24 hours annually to meet 90% standard		
Cost per additional clearance		

28

Anaconda

Anaconda

No of Techs	Exchanges Served	EOY 2000	EOY 2013	Access Line	Percent to Total	
		Access Lines	Access Lines	Loss	of Access Lines	Lost
	2 Anaconda	4,733	1,884	60%	2,849	61%
	24 Deer Lodge	2,619	1,127	57%	1,492	32%
1	60 Anaconda (Opportunity)	451	252	44%	199	4%
	79 Warm Springs	245	144	41%	101	2%
		8,048	3,407	58%	4,641	100%

2012			2013			Thru July 2014			Annual Aveage		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

	LU's	QC	%QC
ANACONDA			
DEER LODGE			
OPPORTUNITY			
WARM SPRINGS			
Total			

	Access Lines	No of Techs	Techs per AL
Current	3,407		
Required to meet standard	3,407		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			



Helena

Helena

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
5	14 Clancy	1,157	413	64%	744	3%
	28 East Helena	4,289	1,353	68%	2,936	12%
	42 Helena Main	30,177	12,534	58%	17,643	72%
	43 Helena North	3,254	1,181	64%	2,073	8%
	12 Canyon Ferry	863	648	25%	215	1%
	75 Townsend	2,038	1,139	44%	899	4%
	86 Wolf Creek	338	251	26%	87	0%
		42,116	17,519	58%	24,597	100%

2012			2013			Thru July 2014			Annual Aveage		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
CLANCY			
EAST HELENA			
HELENA MAIN			
HELENA NORTH			
CANYON FERRY			
TOWNSEND			

Additional cleared in 24 hrs annually to meet 90% std

	Access Lines	No of Techs	Techs per AL
Current	17,519		
Required to meet standard	17,519		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Whitehall

Whitehall

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
1	7 Boulder	1,007	502	50%	505	43%
	83 Whitehall	1,863	1,183	37%	680	57%
		2,870	1,685	41%	1,185	100%

2012			2013			Thru July 2014			Annual Aveage		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
BOULDER			
WHITEHALL			
Total			

	Access Lines	No of Techs	Techs per AL
Current	1,685		
Required to meet standard	1,685		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Additional cleared in 24 hrs annually to meet 90% std

Butte

Butte

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
4	10 Butte	14,154	4,761	66%	9,393	65%
	11 Butte South	7,763	2,748	65%	5,015	35%
		21,917	7,509	66%	14,408	100%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24
Additional cleared in 24 hrs annually to meet 90% std											

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
BUTTE			
BUTTE SOUTH			
Total			

	Access Lines	No of Techs	Techs per AL
Current	7,509		
Required to meet standard	7,509		
Additional techs required			
Annual cost per tech			
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Dillon

Dillon

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss
1	25 Dillon	4,440	1,974	56%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24
[REDACTED]			[REDACTED]			[REDACTED]			[REDACTED]		

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

DILLON	LU's	QC	%QC
	[REDACTED]	[REDACTED]	[REDACTED]

	Access Lines	No of Techs	Techs per Access Line
Current	1,974	[REDACTED]	[REDACTED]
Required to meet standard	1,974	[REDACTED]	[REDACTED]
Additional techs required		[REDACTED]	[REDACTED]
Annual cost per tech		\$100,000	
Total annual cost to meet standard		[REDACTED]	
Additional cleared in 24 hours annually to meet 90% standard		[REDACTED]	
Cost per additional clearance		[REDACTED]	

Cut Bank

Cut Bank

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
	70 St Mary	335	253	24%	82	5%
1	80 West Glacier Pk	535	514	4%	21	1%
	27 East Glacier Pk	426	305	28%	121	7%
	22 Cut Bank	2,475	1,060	57%	1,415	86%
		3,771	2,132	43%	1,639	100%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

	LU's	QC	%QC
ST MARY			
WEST GLACIER			
EAST GLACIER PARK			
CUT BANK			
Total			

	Access Lines	No of Techs	Techs per AL
Current	2,132		
Required to meet standard	2,132		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Great Falls

Great Falls

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
13	Cascade	1,007	712	29%	295	1%
38	Great Falls	44,161	13,793	69%	30,368	97%
76	Ulm	386	250	35%	136	0%
77	Vaughn	1,169	534	54%	635	2%
		46,723	15,289	67%	31,434	100%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
CASCADE			
GREAT FALLS			
ULM			
VAUGHN			
Total			

	Access Lines	No of Techs	Techs per AL
Current	15,289		
Required to meet standard	15,289		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Additional cleared in 24 hrs annually to meet 90% std

Conrad

Conrad

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
19	Conrad	2,256	558	75%	1,698	49%
1	26 Dutton	298	189	37%	109	3%
66	Shelby	2,185	534	76%	1,651	48%
		4,739	1,281	73%	3,458	100%

2012			2013			Thru July 2014			Annual Aveage		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
CONRAD			
DUTTON			
SHELBY			
Total			

Additional cleared in 24 hrs annually to meet 90% std

	Access Lines	No of Techs	Techs per AL
Current	1,281		
Required to meet standard	1,281		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Havre

Havre

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	2012			2013			Thru July 2014			Annual Average			
					CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	
1	41 Havre	7,523	2,747	63%													

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

	LU's	QC	%QC
HAVRE			

	Access Lines	No of Techs	Techs per Access Line
Current	2,747		
Required to meet standard	2,747		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Lewistown

Lewistown

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	2012			2013			Thru July 2014			Annual Average		
					CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24
1	49 Lewistown	5,920	1,295	78%												

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

Additional cleared in 24 hrs annually to meet 90% std

	LU's	QC	%QC
LEWISTOWN			

	Access Lines	No of Techs	Techs per Access Line
Current	1,295		
Required to meet standard	1,295		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Hamilton

Hamilton

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Line Loss	Percent to Total of Access Lines Lost	
	21 Corvallis	3,211	1,851	42%	1,360	12%
	23 Darby	1,923	1,378	28%	545	5%
	39 Hamilton	7,785	4,164	47%	3,621	32%
5	71 Stevensville	4,830	2,327	52%	2,503	22%
	78 Victor	1,708	905	47%	803	7%
	51 Missoula (Lolo)	4,204	1,717	59%	2,487	22%
		23,661	12,342	48%	11,319	100%

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
CORVALLIS			
DARBY			
HAMILTON			
STEVENSVILLE			
VICTOR			
LOLO			
Total			

Additional cleared in 24 hrs annually to meet 90% std

	Access Lines	No of Techs	Techs per AL
Current	12,342		
Required to meet standard	12,342		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

Missoula

Missoula

No of Techs	Exchanges Served	EOY 2000 Access Lines	EOY 2013 Access Lines	Access Lines Lost	Percent to Total of Access Lines Lost	
33	Frenchtown	1,883	1,183	37%	700	2%
8	Missoula (Milltown)	1,422	382	73%	1,040	3%
57	Missoula (Main)	47,352	14,299	70%	33,053	85%
58	Missoula (South)	5,638	1,359	76%	4,279	11%
		56,295	17,223	69%	39,072	100%

Total Living Units (LU's), Living Units with Qwest Corp voice service (QC) and percent of total living units with Qwest Corp voice service (%QC) as of December 2012.

	LU's	QC	%QC
FRENCHTOWN			
MILLTOWN			
MISSOULA MAIN			
MISSOULA SOUTH			
Total			

	Access Lines	No of Techs	Techs per AL
Current	17,223		
Required to meet standard	17,223		
Additional techs required			
Annual cost per tech		\$100,000	
Total annual cost to meet standard			
Additional cleared in 24 hours annually to meet 90% standard			
Cost per additional clearance			

2012			2013			Thru July 2014			Annual Average		
CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24	CLEARED IN 24	TOTAL TICKETS	% CLEARED IN 24

Additional cleared in 24 hrs annually to meet 90% std

The current OOS<24 metric misallocates resources

CenturyLink respectfully asks the Commission to consider whether implementing a plan to enforce the OOS<24 standard is in the best interests of the Commission, Montana consumers and the company.

- OOS<24 Standard established in 1989, when U S WEST had a telephone monopoly in Montana, and served nearly all households in its territory.
- Due to serving < 25% of Living Units, but covering same geographical area, meeting OOS<24 standard 90% of time is much more difficult and costly (e.g., long driving distances). Customers far more dispersed.
- Demands and priorities of Montana customers have changed.
 - Nearly all customers have voice alternatives
 - Broadband now the priority
 - Resources/technicians used to meet rigid monopoly era voice standard are not focused on broadband installation and repair
- CenturyLink is uniquely saddled with large geographic area, significant competitive erosion and mandate to meet SQ standards.

CenturyLink Plans to ask for Waiver of OOS<24 Rule

- To comply with OOS<24 90% standard, CenturyLink would need to spend significant resources on additional technicians. Technicians must be on “standby” to remedy outages as they occur.
- In order to comply with this rule, CenturyLink would need to raise rates or obtain funding from a State Universal Service Fund
 - Raising rates causes further erosion
 - State USF shares burden equally among all customers
- CenturyLink asks the Commission to consider a Waiver of ARM 38.5.3371(7)(b), and requests that it consider enacting an OOS benchmark that requires 80% restoral within 48 hours (Like Idaho standard).