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CenturyLink
1600 7th Avenue, 15th Floor
Seattle, Washington 98191
206-345-6224 (phone)
425-301-8411 (cell)
E-mail: phil.grate@centurylink.com

JUN 12 2015

MONT. P.S. COMMISSION

Phil Grate
Director Montana
Regulatory and Legislative Affairs

June 12, 2015

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

E-filed and e-mailed

Re: Consolidated Docket Nos. D2014.11.91 and N2014.4.38

Dear Ms. Whitney:

Transmitted with this letter is a supplemental response of Qwest Corporation d/b/a CenturyLink QC ("CenturyLink QC") to Data Requests MCC-015 through MCC-033 of the Montana Consumer Counsel ("MCC").

On May 13, 2015 CenturyLink QC filed with the PSC its initial responses to MCC Data Requests MCC-015 through MCC-033.

With the attached June 12, 2015 supplemental response, CenturyLink QC is providing assorted attachments and exhibits protected from public disclosure by Montana PSC Order No. 7388h which grants, in part, CenturyLink QC's motion for a protective order. The protected attachments and exhibits include:

- *MCC-018 Confidential Attachment A* which includes the number of Full Time Equivalent ("FTE") network technicians employed by Century Link QC in Montana by wire center as of December 31, 2012, 2013 and 2014.
- *MCC-024 Confidential Attachment A* which includes information regarding geographically specific Out of Service occurrences in Montana.
- *MCC-028 Confidential Attachments F through J* which provide detailed broadband subscribership data by census tract in Montana, as filed with the FCC as part of the Form 477 filing.

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- *MCC Confidential Attachments K and L* which provide detailed voice subscribership data by census tract in Montana as filed with the FCC as part of the Form 477 filing.
- *MCC-032 Confidential Attachment A* which provides data related to specific cable pair bundles in Montana that have experienced multiple repairs.

Order No. 7388h denied CenturyLink QC's motion for a protective order for

- *MCC-028 Attachment A;*
- *MCC-028 Attachment B;*
- *MCC-028 Attachment C;*
- *MCC-028 Attachment D;*
- *MCC-028 Attachment E.*

On June 10, 2015 Centurylink QC filed these five attachments without redaction.

Respectfully,

A handwritten signature in black ink, appearing to read "Philip E. Grate". The signature is written in a cursive style with a large initial "P" and a long horizontal stroke at the end.

Service Date: June 12, 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 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

**SUPPLEMENTAL RESPONSE OF QWEST CORPORATION d/b/a
CNETURYLINK QC TO DATA REQUESTS OF THE MONTANA
CONSUMER COUNSEL TO CENTURYLINK**

MCC-015

As of December 31, 2012, 2013 and 2014, please provide the number of full-time equivalent network ("FTE") technicians employed in providing repair activities for CenturyLink QC in Montana.

Response: Network Technicians provide repair, outside plant repair and central office repair activities. The number of FTE technicians and incidentals employed is as follows:

- December 31, 2012 – 59 FTE, 8 Incidentals
- December 31, 2013 – 64 FTE, 5 Incidentals
- December 31, 2014 – 63 FTE, 1 Incidental

Note: Incidentals are employees CenturyLink hires during the busy season and they are allowed to work only 1160 hours per year.

Respondent: Dorothea Schaeffer, Area Operations Manager for Western Montana

MCC-016

As of December 31, 2012, 2013 and 2014, please provide the number of FTE network technicians employed in providing outside plant repair activities for Century Link QC in Montana.

Response: Network Technicians provide repair, outside plant repair and central office repair activities. Please see response to MCC-015.

Respondent: Dorothea Schaeffer, Area Operations Manager for Western Montana

MCC-017

As of December 31, 2012, 2013 and 2014, please provide the number of FTE network technicians employed in providing central office repair activities for Century Link QC in Montana.

Response: Network Technicians provide repair, outside plant repair and central office repair activities. Please see response to MCC-015.

Respondent: Dorothea Schaeffer, Area Operations Manager for Western Montana

MCC-018

As of December 31, 2012, 2013 and 2014, please provide the number of FTE network technicians employed in providing outside plant repair activities for Century Link QC in Montana by wire center. If a technician provides outside repair activities in more than one wire center, include the technician in the count for the wire center where the technician is employed for the largest percentage of time and note that the technician also provides services in other wire centers and list those wire centers.

Response: Network Technicians provide repair, outside plant repair and central office repair activities. For the number of FTE network technicians employed by Century Link QC in Montana by wire center as of December 31, 2012, 2013 and 2014 please see *MCC-018 CONFIDENTIAL Attachment A*.

With this May 13, 2015 response CenturyLink QC is providing *MCC-018 CONFIDENTIAL Attachment A* with all confidential information redacted. CenturyLink QC will supplement this response with the confidential data un-redacted under the terms of the Montana PSC order ruling on our motion for a protective order to protect the confidential data from public disclosure.

June 12, 2015 Supplemental Response: In accordance with Montana PSC Order No. 7388h served June 8, 2015 in the above referenced docket, CenturyLink QC is providing *MCC-018 CONFIDENTIAL Attachment A* with all confidential information un-redacted.

Respondent: Dorothea Schaeffer, Area Operations Manager for Western Montana

MCC-019

As of December 31, 2012, 2013 and 2014, please provide the number of FTE network technicians employed in providing central office repair activities for Century Link QC in Montana by wire center. If a technician provides central office repair activities in more than one wire center, include the technician in the count for the wire center where the technician is employed for the largest percentage of time and note that the technician also provides services in other wire centers and list those other wire centers.

Response: Network Technicians provide repair, outside plant repair and central office repair activities. For the number of FTE network technicians employed by Century Link QC in Montana by wire center as of December 31, 2012, 2013 and 2014 please see *MCC-018 CONFIDENTIAL Attachment A*.

Respondent: Dorothea Schaeffer, Area Operations Manager for Western Montana

MCC-020

Is the Century Link QC in Montana service territory divided into areas for the purpose of providing repair service? If so, please specify the wire centers included in each area, and provide the number of repair supervisory personnel employed in each area as of December 31, 2012, 2013 and 2014. With respect to the repair supervisory personnel identified, please provide their hire and start dates and years of service with CenturyLink QC or its predecessor in interest.

Response: Yes. Please see *MCC-018 CONFIDENTIAL Attachment A* for wire centers under the following work areas.

Work Area – Great Falls

December 31, 2012 – 2014, 1 Supervisor, Hire/Start date 11/17/2008

Work Area – Missoula

December 31, 2012 – 2014, 1 Supervisor, Hire/Start date 9/8/2008

Work Area – Butte

December 31, 2012 – 1 Supervisor, Hire/Start date 5/6/1996

December 31, 2013 – 1 Supervisor, Hire/Start date 5/21/1993

December 31, 2014 – 1 Supervisor, Hire/Start date 11/17/2008

Work Area – Billings

December 31, 2012 – 2014, 2 Supervisors, Hire/Start date 11/27/2006 and 3/5/2012

Work Area – Helena

December 31, 2012 – 2014, 1 Supervisor, Hire/Start date 5/6/1996

Work Area – Bozeman

December 31, 2012 – 2014, 1 Supervisor, Hire/Start date 8/23/2004

Respondent: Dorothea Schaeffer, Area Operations Manager for Western Montana

MCC-021

Please provide the number of repair supervisory personnel employed by Century Link Montana as of December 31, 2012, 2013 and 2014. With respect to the repair supervisory personnel identified, please provide their hire and start dates and years of service with CenturyLink QC or its predecessor in interest.

Response: Please see response to MCC-020.

Respondent: Dorothea Schaeffer, Area Operations Manager for Western Montana

MCC-022

Regarding the CenturyLink QC Montana OOS Miss Detail Report, please provide a glossary of terms, abbreviations and acronyms that appear in the “type of trouble reported” column.

Response: Please see MCC-022 Attachment A.

Respondent: Victoria Hunnicutt, Regulatory Operations Director

MCC-023

Regarding the CenturyLink QC Montana OOS Miss Detail Report, please provide a glossary of terms, abbreviations and acronyms that appear in the “action taken to clear trouble” column.

Response: Please see MCC-022 Attachment A.

Following is a description of three other commonly used terms:

1. CTC means “cut to clear” which is moving service from a bad cable pair to a good cable pair.
2. “Cable trouble repaired” means that a defective cable pair was repaired so that it can provide service.
3. NI or NT means “network interface” or “network terminal” which is the point of demarcation of CenturyLink’s facilities at a customer premise.

Respondent: Jason Moothart, Area Operations Manager for Eastern Montana

MCC-024

Please provide a copy of CenturyLink QC’s response to PSC –003(e) Confidential Attachment (A) to include the following additional columns along with the original data:

- a. Action Taken to Clear Trouble
- b. OSP indicator [Y/N]
- c. Carrier system indicator [Y/N]
- d. Carrier system type/manufacturer
- e. Estimated date of install

Please provide the updated response in either in Access data base or in Excel spreadsheet format.

Objection: CenturyLink QC objects to this request on the grounds that is overly broad, unduly burdensome, not tailored to lead to the discovery of relevant information, and responding to it would require a costly special study. See MRCP 26(g)(1)(c). Notwithstanding and without waiving this objection, CenturyLink QC provides a response to subpart (a).

Response: Please see *MCC-024 CONFIDENTIAL Attachment A*.

CenturyLink QC is not providing *MCC-024 CONFIDENTIAL Attachment A* with this May 13, 2015 response pending the granting of a protective order by the Montana PSC to protect from public disclosure the confidential data it contains.

June 8, 2015 Supplemental Response: In accordance with Montana PSC Order No. 7388h served June 8, 2015 in the above referenced docket, CenturyLink QC is providing *MCC-024 CONFIDENTIAL Attachment A*. If printed, *MCC-024 CONFIDENTIAL Attachment A* would consume over 200 pieces of paper. Accordingly, CenturyLink QC is providing an Excel spreadsheet of this attachment only.

Respondent: Victoria Hunnicutt, Regulatory Operations Director

MCC-025

Regarding CenturyLink QC's response to PSC-004 (a), please provide the following information:

- a. A list of wire centers with a switch that is not integrated;
- b. The manufacturer and model of switch that would need to be replaced in order to allow the replacement technology to work;
- c. Define the term "integrated switch" and explain why some switches are considered integrated and other switches are not integrated;
- d. Explain why rate center consolidation is necessary to the backhaul of traffic to an integrated host switch;

- e. Describe the replacement technology that would be used to replace the analog carrier systems; and
- f. The work papers that show the calculation of the \$157 million cost of replacing the analog carrier systems.

Response: Please see CenturyLink QC's May 6, 2015 Supplemental Response to MCC-014.

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

MCC-026

Please provide any memoranda, documents or studies that support your recommendation to transfer three network technicians from construction to repair activities as a possible solution to out of service greater than 24 hours issue.

Response: There are no memoranda, documents or studies that support this decision. The decision was made by Mr. Schmit in consultation with the Director of Construction for Montana. He was notified that three fully qualified technicians were available for reassignment from construction to repair work.

Respondent: Jason Moothart, Area Operations Manager for Eastern Montana

MCC-027

Please provide a copy of any Form 481 submitted to the FCC for CenturyLink QC of Montana.

Response: Please see *MCC-009 Exhibit 165* and *MCC-009 Exhibit 166*.

Respondent: Ken Buchan, Manager, Regulatory Finance

MCC-028

Please provide a copy of Form 477 submitted to the FCC for CenturyLink QC of Montana for data as of December 31, 2012, June 30, 2013, December 31, 2013, June 30, 2014 and December 31, 2014.

Response: For a “screenshot” of the CenturyLink Form 477 filings made electronically with the FCC please see:

- *MCC-028 CONFIDENTIAL Attachment A;*
- *MCC-028 CONFIDENTIAL Attachment B;*
- *MCC-028 CONFIDENTIAL Attachment C;*
- *MCC-028 CONFIDENTIAL Attachment D;*
- *MCC-028 CONFIDENTIAL Attachment E.*

For detailed broadband subscribership data by census tract in Montana—as filed with the FCC as part of the Form 477 filing—please see:

- *MCC-028 CONFIDENTIAL Attachment F;*
- *MCC-028 CONFIDENTIAL Attachment G;*
- *MCC-028 CONFIDENTIAL Attachment H;*
- *MCC-028 CONFIDENTIAL Attachment I;*
- *MCC-028 CONFIDENTIAL Attachment J.*

For detailed voice subscribership data by census tract in Montana—as filed with the FCC as part of the Form 477 filing—please see:

- *MCC-028 CONFIDENTIAL Attachment K;*
- *MCC-028 CONFIDENTIAL Attachment L.*

With this initial response CenturyLink QC is providing MCC-028 CONFIDENTIAL Attachments A through E with all confidential information redacted and is not providing MCC-028 CONFIDENTIAL Attachments F through L because all of the data they contain is confidential. CenturyLink QC will supplement this response with the confidential data under the terms of the Montana PSC order ruling on our motion for a protective order to protect the confidential data from public disclosure.

For broadband deployment data by census tract—as filed with the FCC as part of the Form 477 filing—please see:

- *MCC-028 Attachment M;*
- *MCC-028 Attachment N.*

If printed, *MCC-028 Attachment M* would consume 596 pieces of paper and *MCC-028 Attachment N* would consume 638 pieces of paper. Accordingly, CenturyLink QC will not print these attachments and will provide them as pdf files only.

June 12, 2015 Supplemental Response: In accordance with Montana PSC Order No. 7388h served June 8, 2015 in the above referenced docket, CenturyLink QC is providing the following attachments with all confidential information un-redacted.

- *MCC-028 CONFIDENTIAL Attachment F;*
- *MCC-028 CONFIDENTIAL Attachment G;*
- *MCC-028 CONFIDENTIAL Attachment H;*
- *MCC-028 CONFIDENTIAL Attachment I;*
- *MCC-028 CONFIDENTIAL Attachment J;*
- *MCC-028 CONFIDENTIAL Attachment K;*
- *MCC-028 CONFIDENTIAL Attachment L.*

PSC Order No. 7388h denied CenturyLink QC's motion for a protective order for *MCC-028 CONFIDENTIAL Attachments A through E*. Accordingly, On June 10, 2015, CenturyLink QC filed as non-confidential and without redaction the following:

- *MCC-028 Attachment A;*
- *MCC-028 Attachment B;*
- *MCC-028 Attachment C;*
- *MCC-028 Attachment D;*
- *MCC-028 Attachment E.*

Respondent: Ken Buchan, Manager, Regulatory Finance

MCC-029

Regarding CenturyLink QC's supplemental response to PSC-002 (b), please provide the census blocks where the customers served by open wire are located.

Response: Please see response to PSC-010(b) for a description of the specific locations where customers are served by open wire. CenturyLink has not determined the census blocks in which each of these open wire locations resides. To do so would require a special study.

Respondent: Bob Brigham, Director Regulatory Operations

MCC-030

Please describe CenturyLink QC's procedures for responding to and resolving trouble reports. As part of your response, please provide the following information:

- a. When the customer calls the company regarding a trouble is the customer routed to a call center in Montana or in a call center in another state or other location? If the call center is in another state or other location, provide that location, including the city and state where the call center is located.

Response: All Centurylink call centers are located outside Montana. For the most part, calls from Montana are handled out of Denver, Colorado but other call center locations may also handle Montana calls.

Respondent: Jason Moothart, Area Operations Manager for Eastern Montana

- b. How are the trouble tickets assigned to the technicians? Does the call center assign the tickets? Does a regional load control supervisor make the assignments? If so, where is the regional load control supervisor located and define the region that the load control supervisor is in charge of? Alternatively are the assignments made by a local Montana based supervisor?

Response: Call centers do not assign (load) tickets; nor does a regional load control supervisor. Responsibility to load tickets is a coordinated effort between a load specialist located in Denver, Colorado and the technician's local supervisor who is an Area Plant Supervisor (APS). Load is assigned to a technician based on the time the technician has available during a given tour of duty. Initial responsibility for assigning loads each day falls to the load specialist. However the APS has final authority to load the technicians he or she supervises. Each APS is in daily communication with load specialists to determine the load of each of the APS's technicians. Hence, the assignment of each day's load is the result of a coordinated effort between the load specialists and the local APS.

Respondent: Jason Moothart, Area Operations Manager for Eastern Montana

- c. When the technician completes the assignment who does the technician report that fact to?

Response: Technicians do not report completion of an assignment to a person. Instead, they use an automated wireless system to report the completion of a ticket.

Respondent: Jason Moothart, Area Operations Manager for Eastern Montana

- d. Are there any metrics that would shift a job from a repair issue to an engineering issue? By way of example only, such metrics may be if the cost of the repair is above a certain dollar amount or requires more than a certain amount of cable to be replaced. If such a metric exists or is used, please specify the metric(s).

Response: There are no specific thresholds or metrics that determine when a repair is turned over to engineering for a construction project. Instead, the need for construction is decided on a case-by-case basis.

Respondent: Jason Moothart, Area Operations Manager for Eastern Montana

- e. Provide a sample of a completed form that an outside plant technician would file when he completes a repair.

Response: Technicians do not report completion of an assignment on a form. Instead, they use an automated wireless system to report the completion of a ticket.

Respondent: Jason Moothart, Area Operations Manager for Eastern Montana

MCC-031

For each calendar year 2012, 2013 and 2014, inclusive, please provide:

- a. The number of trouble reports that were transferred to a state engineering manager; and
- b. The number of trouble reports that were solved by the state engineering manager.

Response: CenturyLink QC does not transfer trouble tickets to the state engineering manager. If resolution of trouble requires construction, then the Area Operations Manager and/or Area Plant Supervisor will make a request for

engineering to engineer a job. CenturyLink QC does not track such requests.

Respondent: Ronald Smith, Manager, Engineering and Construction; Jason Moothart, Area Operations Manager for Eastern Montana; Dorothea Schaffer, Area Operations Manager for Western Montana

MCC-032

Does CenturyLink QC track outside plant problems such as multiple repairs to the same cable bundle? If so, please provide the reports that track those problems.

Response: Yes. Please see *MCC-032 CONFIDENTIAL Attachment A*.

CenturyLink QC is not providing *MCC-032 CONFIDENTIAL Attachment A* with this May 13, 2015 response pending the granting of a protective order by the Montana PSC to protect from public disclosure the confidential data it contains.

June 12, 2015 Supplemental Response: In accordance with Montana PSC Order No. 7388h served June 8, 2015 in the above referenced docket, CenturyLink QC is providing *MCC-032 CONFIDENTIAL Attachment A*. If printed, *MCC-032 CONFIDENTIAL Attachment A* would consume 132 pieces of paper. Accordingly, CenturyLink QC is providing *MCC-032 CONFIDENTIAL Attachment A* as an electronic file only. CenturyLink QC will provide printed pages of the report upon request.

Respondent: Jason Moothart, Area Operations Manager for Eastern Montana

MCC-033

Since January 1, 2012, has CenturyLink QC replaced any analog carrier systems? If so, for each system replaced provide the following information:

- a. The date the analog system was replaced;
- b. The number of customers served by the analog system;
- c. The precise location of the analog system and the wire center the system is connected to;
- d. The type of equipment used to replace the analog system;

- e. The cost of the equipment used to replace the analog system; and
- f. The total cost associated with the replacement of the analog system.

Response: No.

Respondent: Ronald Smith, Manager, Engineering and Construction.