

**PUBLIC SERVICE COMMISSION
STATE OF MONTANA**

Brad Johnson, Chairman
Travis Kavulla, Vice Chairman
Kirk Bushman, Commissioner
Roger Koopman, Commissioner
Bob Lake, Commissioner



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March 23, 2015

TO: Phil Grate
Regulatory and Legislative Director
1600 7th Ave., 15th Floor
Seattle, WA 98191

Peter Scott - Attorney
Gough, Shanahan Johnson & Waterman
682 S. Ferguson Ave., Suite 4
Bozeman, MT 59718

FROM: Gary Duncan/Mike Dalton – Rate Analysts

RE: Data request in Docket D2014.11.91

Enclosed please find data requests of the Montana Public Service Commission to CenturyLink, numbered PSC-008 through PSC-010 in the above referenced docket. When responding, please restate the data request and identify the respondent. Additional discovery requirements are contained in the February 28, 2015 Procedural Order No. 7388c.

Respondent must file an original and four copies with the Commission, 1701 Prospect Avenue, P.O. Box 202601, Helena, Montana 59620-2601. Responses must also be e-filed at <http://psc.mt.gov> (go to "Account Login/Registration" under the "Electronics Documents" tab).

If you have any questions regarding discovery, please contact Gary Duncan at 406-444-6189, gduncan@mt.gov or Mike Dalton at 406-444-6185 mdalton2@mt.gov. Questions on the e-filing process should be directed to Sandy Scherer at 406-444-6180, sscherer@mt.gov.

Sincerely,

A handwritten signature in cursive script that reads "Gary Duncan".

Gary Duncan
Regulatory Division
Montana Public Service Commission

Service Date: March 23, 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.)
Mont. 38.5.3371(7)(b)

DATA REQUESTS PSC-008 THROUGH PSC-010 OF THE
MONTANA PUBLIC SERVICE COMMISSION
TO
QWEST CORPORATION d/b/a CENTURYLINK QC

PSC-008

Regarding: Digital Loop Carrier Systems, CAF Phase II Census Blocks
Witness: Unknown

- a. Please provide the location of each digital loop carrier system in an ESRI Shape file or other GSI format, and the number of customers served by each system. Please also provide a map showing the location of each digital carrier system.
- b. How many of the digital loop carrier systems are located in census blocks eligible for CAF Phase II funding? Please provide the response in the same format that CenturyLink used to respond to PSC-004(b).
- c. Please provide a map showing the census blocks eligible for CAF Phase II funding in which digital loop carrier systems are located.
- d. Would digital loop carriers be required to be replaced in CAF Phase II census blocks if CenturyLink QC accepts the funding? Please explain

PSC-009

Regarding: Open Wire Response to PSC-002b

Witness: Ronald Smith

- a. Regarding the response to PSC-002 and the statement that open wire used as service drops is not reported in the OSPFM, please define service drop.
- b. Are there service drops in use in Montana that are open wire? Is there any method of estimating the number of open wire service drops?
- c. Is the facility from subscriber pair gain equipment such as an Anaconda carrier to the customers premise considered a service drop?
- d. If yes, could these service drops from analog carriers to the customers premise be open wire?
- e. Please provide the estimated length of service drops in Montana from the shortest to the longest. Please provide an estimate of the average length of a service drop.

PSC-010

Regarding: Open Wire Response to PSC-002b, 60% unserved, Asset Records.

Witness: Ronald Smith, Bob Brigham

- a. Please explain what types of problems are associated with open wire service drops not associated with sheathed service drops.
- b. Please provided the exact geographic locations of the 50.1 miles of open wire referenced in the response to DR PS-002 in ESRI Shapefile format.
- c. Please explain in detail how census block information from the National Broadband Map is used to estimate the percentage of an exchange that is unserved. (Exhibit 5 to SDR PSC-001)
- d. FCC Order No. DA 13-2101 ¶10 states as follows: “Therefore, consistent with long-standing Commission policy, we take this opportunity to restate that carriers may use their frozen high-cost support either to recover the costs of past network upgrades to extend broadband-capable networks in areas substantially unserved by an unsubsidized competitor, or to maintain and operate existing networks in such areas, or a combination of the two.” Footnote 238 of the FCC Transformation Order FCC 11-161, states in part as follows: However, we recognize that certain expenditures, such as investments in a digital subscriber line access multiplexer (DSLAM) and/or middle mile infrastructure, that benefit a geographic area unserved by an unsubsidized competitor may also benefit some locations where an unsubsidized competitor provides service. We do not intend to preclude such investments. While we expect CAF recipients to use support in areas without an unsubsidized competitor,

to the extent support is used to serve any geographic area that is partially served by an unsubsidized competitor, the recipient must certify that, with respect to the frozen high-cost support dollars subject to this obligation, at least 50 percent of the locations served are in census blocks shown as unserved by an unsubsidized competitor, as shown on the National Broadband Map. For example, if a given middle mile feeder for which frozen high-cost support dollars are used serves 100 locations, and only 40 of those locations are in census blocks shown as unserved by an unsubsidized competitor on the National Broadband Map, the recipient would not be in compliance with this requirement. For purposes of determining whether this requirement is met, carriers must be prepared to provide asset records demonstrating the existence of facilities, such as a DSLAM and/or middle mile plant that serve locations in census blocks where there is no unsubsidized competitor.

Please provide the asset records as described in Footnote 208.