

**PUBLIC SERVICE COMMISSION
STATE OF MONTANA**

Brad Johnson, Chairman
Travis Kavulla, Vice Chairman
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1701 Prospect Avenue
PO Box 202601
Helena, MT 59620-2601
Voice: 406.444.6199
Fax #: 406.444.7618
<http://psc.mt.gov>
E-Mail: psc_webmaster@mt.gov

April 29, 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-011 through PSC-014 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.

Per Procedural Order No. 7388c, responses must be filed on or before May 15, 2015. 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 "Electronic 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 black ink that reads "Gary Duncan".

Gary Duncan
Regulatory Division
Montana Public Service Commission

Service Date: April 29, 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. 38.5.3371(7)(b))

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

DATA REQUESTS PSC-011 THROUGH PSC-014 OF THE
MONTANA PUBLIC SERVICE COMMISSION
TO
QWEST CORPORATION d/b/a CENTURYLINK QC

PSC-011

Regarding: April 13, 2013 Plan, Parts 1 & 2 - October 17, 2014
CenturyLink Presentation to the PSC

Respondent: Phil Grate

- a. In its October 17, 2014 Presentation to the Commission, CenturyLink estimated, in aggregate, it would require hiring 38 additional technicians at a cost of \$3.8 million annually in order to reach compliance with the 90% OOS cleared < 24 Hours Rule (Rule). Are these estimates still valid? If not, please explain why and provide new estimates.
- b. Plan Part 1. Please provide the wire centers in which each of the three reassigned network technicians will be doing repair work.
- c. How long will the reassignments of the three technicians referenced above be effective?
- d. Please provide the wire centers in which additional construction technicians may be reassigned to repair activities
- e. Plan Part 2. Please explain what comprises "other activities."

PSC-012

Regarding: April 13, 2015 Plan, October 17, 2014 CenturyLink presentation to the PSC
Respondent: Phil Grate

- a. Plan Part 3. Please provide an estimate of the number of hours of overtime necessary to reach compliance with the Rule and the wire centers in which such overtime will be utilized.
- b. Plan Part 4. Please provide the number of new technicians to be hired by wire center.
- c. In the October 17, 2014 Presentation to the PSC, CenturyLink estimated the annual cost of adding a technician at \$100,000. Is that still an accurate estimate? If not please explain why and provide a new estimated of the annual cost.
- d. CenturyLink, as an ETC, has obligation to provide rural areas comparable services at comparable rates as provided in urban areas. The current repair reports provided to the PSC by CenturyLink show the percentage of OOS Cleared < 24 Hours in its rural areas is significantly below the percentage cleared in its urban areas. Please describe all activities which will take place to improve response time in CenturyLink's rural wire centers including the adding of technicians in those rural areas.
- e. Does CenturyLink have any plans to improve maintenance of its rural network including replacement of antiquated and outdated cable and analog carrier systems? Please explain.

PSC-013

Regarding: April 13, 2013 Plan
Respondent: Phil Grate

- a. Has CenturyLink performed analysis comparing the long-term cost of replacing aging infrastructure in any rural, high-failure rate areas to the long-term cost of hiring additional service technicians to address the service calls which are being caused by the aging infrastructure?
- b. If yes, please provide the analysis for each service area that CenturyLink has analyzed, including supporting work papers.
- c. If no, please explain why CenturyLink has not completed such an analysis.
- d. If no, how can CenturyLink be confident that the plan it has put forth is the least cost solution to resolving its service quality issues in rural areas?

PSC-014

Regarding: April 13, 2013 Plan, Wibaux
Respondent: Phil Grate

- a. Please confirm that CenturyLink's service quality plan calls for no capital investments to update aging and failing infrastructure.
- b. How did CenturyLink determine its target date of October 15, 2015 for compliance with Admin. R. Mont. 38.5.3371(7)(b) if it is not able to set dates for milestones for achieving specific levels of OOS restoral performance prior to that date?
- c. Per CenturyLink Response to DR PSC-006(b), the Trouble Report Rate for Wibaux for the period January 2014 through November 2014 consistently exceeded the Trouble Report Rate standard set forth in ARM 38.5.3371(7)(a) of no more than six per 100 local access lines. Please provide the trouble report rate for Wibaux for December, 2014 and for each past month in 2015 and continue to report to the PSC the monthly Wibaux Trouble Report Rate until notified by the Commission to cease providing the reports.
- d. Please explain in detail the nature and causes of the high Wibaux trouble report rate and actions taken to reduce the rate, including a description of any network improvements undertaken to lower the trouble report rate.