

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

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IN THE MATTER OF CenturyLink QC's) REGULATORY DIVISION
Service Quality and Its Response to Notice)
of Commission Action in Docket) DOCKET NO. D2014.11.91
N2014.3.38, Including Petition for Waiver of)
Admin. R. Mont. 38.5.337197)(b))

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

**DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL
TO CENTURYLINK**

MCC-001

Regarding: October 17, 2014 Presentation
Witness: Unknown/any

Regarding the information contained in Slide 2, please provide the following in electronic spreadsheet or database format and in paper format:

- a. The investment for each year from 2000 through 2013, and for 2014 when that number becomes available (please specify that date if it is not currently available).
- b. The investment by wire center for every Montana wire center for each year from 2000 through 2013 and 2014 when that number becomes available.
- c. The investment by program type, where program types are FTTN, COIP, FTTH, Fiber to the Business and Fiber to the Cell Tower, for each year from 2000 through 2013 and 2014 when that number becomes available.
- d. The investment by wire center by program type, where program types are FTTN, COIP, FTTH, Fiber to the Business and Fiber to the

Cell Tower, for each year from 2000 through 2013 and 2014 when that number becomes available.

MCC-002

Regarding: October 17, 2014 Presentation

Witness: Unknown/any

Regarding CenturyLink's October 17, 2014 to the Commission and the attached slide presentation, slides 3 and 4, please provide in electronic spreadsheet or database format and in paper format:

- a. The addresses for the households where FTTN is deployed.
- b. The addresses for the households where COIP is deployed.
- c. The addresses for households where bonded solution is deployed.
- d. The addresses for households where FTTH is deployed.

MCC-003

Regarding: October 17, 2014 presentation

Witness: Unknown/any

Regarding CenturyLink's October 17, 2014 presentation to the Commission and the attached slide presentation, slide 4, please provide, in electronic spreadsheet or database format and in paper format, the census block and wire center where there is a cell tower that is served by the Fiber to the Cell Tower initiative.

MCC-004

Regarding: October 17, 2014 presentation

Witness: Unknown/any

Regarding CenturyLink's October 17, 2014 presentation to the Commission and the attached slide presentation, slides 3 and 5, please explain what causes the difference between the 193,223 households with fiber fed service shown on slide 3 and the 147,000 access lines shown on slide 5. Provide a work paper in electronic spreadsheet or database format that supports your explanation.

MCC-005

Regarding: Video services
Witness: Unknown/any

Does CenturyLink resell video services to any customers in Montana? If so, please provide:

- a. The date when the service was first offered.
- b. The number of customers purchasing this service by wire center on December 31, 2011, 2012 and 2013.
- c. List the companies whose video services CenturyLink resells.

MCC-006

Regarding: Video services
Witness: Unknown/any

Does CenturyLink provide video services as part of a joint marketing arrangement to any customers in Montana? If so, please provide:

- a. The date when the service was first offered.
- b. The number of customers purchasing this service by wire center on December 31, 2011, 2012 and 2013.
- c. List the companies that CenturyLink has joint marketing arrangements with.

MCC-007

Regarding: October 17, 2014 Presentation
Witness: Unknown/any

Regarding CenturyLink's October 17, 2014 presentation to the Commission and the attached slide presentation, slide 10, please provide, in electronic spreadsheet or database format and in paper format, the number of living units and CenturyLink voice service customers by wire center.

MCC-008

Regarding: Access lines
Witness: Unknown/any

Please provide, in electronic spreadsheet or database format and in paper format, the number of total switched access lines and the number of residential access lines by census block as of December 31, 2013.

MCC-009

Regarding: Filings with government entities
Witness: Unknown/any

Please provide every document or filing provided to the FCC or the Universal Service Administrative Company regarding any FCC universal program for the years 2005 through the present for both Qwest and for CenturyLink.

MCC-010 Regarding: Montana cash flow table
Witness: Unknown/any

Please provide a state of Montana cash flow table for the years 2009 through 2013. Please provide the workpapers and underlying files in Excel or other electronic format.

MCC-011

Regarding: Montana cash flow table
Witness: Unknown/any

Please provide all Leadership scoreboard reports for every Montana exchange for 2013 and 2014 for CenturyLink QC. Please provide the workpapers and underlying files in Excel or other electronic format.

MCC-012

Regarding: Montana cash flow table
Witness: Unknown/any

Please provide an electronic wire center boundary map for the CenturyLink wire centers in the state of Montana in an ESRI Shape file or in a format that can be imported by an ERSI software package.

MCC-013

Regarding: Follow up to PSC 003
Witness: Unknown/any

Regarding your response to PSC 003, please provide all documents and work papers that support your \$20 per-foot estimate of the cost of replacing open wire.

MCC-014 Regarding: Follow up to PSC 004
Witness: Unknown/any

Regarding your response to PSC 004, please provide all documents and work papers that support your \$157 million estimate of the cost of replacing analog carrier systems. Include in your response the locations and models of the switches that are not integrated. Include in your response an explanation of whether the technologies used to determine the cost estimate are compatible with the provisioning of Ethernet and VoIP services.