



**CenturyLink**  
1600 7<sup>th</sup> Avenue, 15<sup>th</sup> Floor  
Seattle, Washington 98191  
206-345-6224 (phone)  
425-301-8411 (cell)  
E-mail: [phil.grate@centurylink.com](mailto:phil.grate@centurylink.com)

**Phil Grate**  
Director Montana  
Regulatory and Legislative Affairs

April 13, 2015

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

E-filed and hand delivered

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

Dear Ms. Whitney:

Qwest Corporation d/b/a CenturyLink QC (“CenturyLink QC”) includes with this letter its plan to improve the repair times for out of service customers of telephone service so that CenturyLink QC achieves compliance with Admin. R. Mont. 38.5.3371(7)(b) for its legacy Qwest serving area. In addition, CenturyLink QC will file separately a withdrawal of its petition for a waiver of Admin. R. Mont. 38.5.3371(7)(b).

This docket involves allegations that CenturyLink QC has not met the requirements in Admin. R. Mont. 38.5.3371(7)(b), which provides:

Ninety percent of out of service trouble reports shall be cleared within 24 hours, excluding Sunday (except where access to the customer's premises is required but not available, or where interruptions are caused by unavoidable causalities and acts of God affecting large groups of customers).

With regard to this service quality requirement, a Notice of Commission Action issued in Docket No. N2014.4.38 on August 26, 2014 requires CenturyLink QC to file a plan to improve the repair times for out of service (“OOS”) customers, such that CenturyLink

will be in compliance with Admin. R. Mont. 38.5.3371(7)(b), for its legacy Qwest serving area.

On November 12, 2014, the Commission opened a contested case proceeding under Docket No. D2014.11.91 in which it set April 17, 2015 as the deadline for CenturyLink to file its repair service improvement plan. CenturyLink is meeting that deadline by filing the attached plan to comply with Admin. R. Mont. 38.5.3371(7)(b).

CenturyLink QC shares the Commission's interest in both its overall service quality performance under Admin. R. Mont. 38.5.3371(7)(b) and the issue of service quality specific to the more rural areas that the company serves. However, the primary and immediate concern is the company's compliance with the rule. As a result, the company's plan directs existing and new resources towards meeting the standard in Admin. R. Mont. 38.5.3371(7)(b) as quickly as possible.

CenturyLink QC believes that a contested case proceeding does not provide an opportunity for dialog with the Commission, its Staff, customers and other interested parties. Such a dialog is necessary if service quality issues are to be evaluated in a manner that considers the needs of today's customers, and the complex technological, financial, and economic issues affecting today's market. CenturyLink QC hopes to have an opportunity, in the near future, to engage in a discussion with the Commission, MCC, and other interested parties to address the Commission's rules in the context of these issues. CenturyLink QC shares the Commission's interests in ensuring its customers throughout the state have access to high quality telecommunications and information services and looks forward to working with the Commission to achieve that goal.

Respectfully,

A handwritten signature in black ink, appearing to read "Philip E. Gratz". The signature is written in a cursive, flowing style with some loops and flourishes.

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

IN THE MATTER OF CenturyLink QC's 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)	)   REGULATORY DIVISION ) ) ) ) )   DOCKET NO. D2014.11.91
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QWEST CORPORATION d/b/a CENTURYLINK QC  
PLAN TO COMPLY WITH ADMIN. R. MONT. 38.5.3371(7)

In 1989, the Montana Public Service Commission (“Commission”) promulgated rules whose stated purpose is to “establish certain minimum standards for determining if regulated telecommunications service provided on a retail basis is adequate.” Admin. R. Mont. 38.5.3301. Admin. R. Mont. 38.5.3371 establishes “service quality requirements for facilities-based local exchange carriers.” Admin. R. Mont. 38.5.3371(1). Admin. R. Mont. 38.5.3371(7)(b) describes the specific Out of Service (“OOS”) restoral standard:

Ninety percent of out of service trouble reports shall be cleared within 24 hours, excluding Sunday (except where access to the customer's premises is required but not available, or where interruptions are caused by unavoidable causalities and acts of God affecting large groups of customers).

With regard to this service quality requirement, a Notice of Commission Action issued on August 26, 2014 in Docket No. N2014.4.38 states:

Within 60 days of the date of this Notice, CenturyLink shall file with the Commission a plan to improve the repair times for OOS customers, such that CenturyLink will be in compliance with Admin. R. Mont. 38.5.3371(7)(b), for its legacy Qwest serving area. Such a plan should include details regarding capital expenditures, operating expenses, and staffing required to achieve clearing 90% of OOS trouble reports within 24 Hours. The

plan must include measurable milestones by which the PSC can gauge the progress towards the 90% target. For example, 70% by a date certain, 80% by a date certain, and an estimated date to reach the 90% target. CenturyLink shall file a written plan with the Commission and shall make an oral presentation to the Commission regarding the plan prior to the 60 day deadline. CenturyLink shall file quarterly progress reports and be prepared to make an oral presentation if required by the Commission.

On October 24, 2014, CenturyLink QC filed its *Response to Notice of Commission Action, Request for Continuance, and Petition for Waiver* (Response). In the Response, CenturyLink requested that the Commission grant a continuance of the 60-day deadline for filing a repair service improvement plan so that the company could work with the Commission and its staff on the issues raised by CenturyLink, commissioners and staff at the October 17, 2014 oral presentation. In addition, CenturyLink petitioned the Commission for a waiver of Admin. R. Mont. 38.5.3371(7)(b) pursuant to Admin. R. Mont. 38.5.3301(3), which provides that the Commission may waive a telecommunications service standard if it results in “unreasonable hardship” for a carrier.

In a Notice of Commission Action dated November 12, 2014, the Commission opened a contested case proceeding under Docket No. D2014.11.91 and granted CenturyLink’s request for a continuance of the deadline by which CenturyLink must file a repair service improvement plan. In Procedural Order No. 7388c dated February 20, 2015 and served February 23, 2015, the Commission set an April 17, 2015 deadline for CenturyLink QC to file its repair service improvement plan.

In accordance with the Commission’s Notice, CenturyLink QC has implemented the following four part plan to improve the restoral times for OOS customers such that CenturyLink will be in compliance with Admin. R. Mont. 38.5.3371(7)(b) in its legacy Qwest serving area.

1. Effective March 29, 2015, CenturyLink QC temporarily reassigned the responsibilities of three network technicians in Montana from construction activities to repair activities. Additional construction technicians may be reassigned periodically to repair activities depending on needs of our customers. This reprioritization has no direct effect on CenturyLink QC’s capitalized or expensed expenditures.

2. Effective April 1, 2015, the Vice President of Operations responsible for CenturyLink QC operations in Montana has directed his Montana area operations managers to schedule work assignments of CenturyLink QC's outside plant workforce so that restoral of out of service conditions takes a higher priority than other activities, with the aim of achieving the standard established in Admin. R. Mont. 38.5.3371(7)(b). This reprioritization is likely to affect the timeliness of CenturyLink QC's other activities in Montana but has no direct effect on CenturyLink QC's capitalized or expensed expenditures.
3. Additional technicians will be scheduled to work on Saturdays as necessary and additional overtime may be worked to clear OOS trouble reports. This will increase overtime expense, but has no direct effect on CenturyLink QC's capitalized expenditures.
4. Effective April 1, 2015, the Vice President of Operations responsible for CenturyLink QC operations in Montana began the process of hiring individuals in Montana who can be trained as network technicians and then deployed in Montana to assist in restoring service. This hiring initiative will increase operating expenses although it is too soon to determine by how much. It will have no effect on capital expenditures.

It typically takes a minimum 90 to 150 days to hire and train a new technician and CenturyLink QC has faced challenges finding qualified individuals willing to work in some of the company's serving areas. Given this challenge, it is difficult for CenturyLink QC to estimate the exact rate at which improvement against the Admin. R. Mont. 38.5.3371(7)(b) standard will be achieved. At this time CenturyLink QC is not setting date certain milestones for achieving specific levels of OOS restoral performance, but the company's aim is to meet the monthly standard by October, 2015. CenturyLink QC will continue to file monthly updates with the Commission that will show the progress made by the company toward meeting the standard.



## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that true and correct copies of the foregoing were served on April 13, 2015, in the manner shown and addressed as follows:

### **Hand delivered and e-filed:**

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

### **Emailed**

Peter G. Scott, Esq.  
Gough, Shanahan, Johnson & Waterman  
682 S Ferguson Avenue, Suite 4  
Bozeman, MT 59718  
[pgs@gsjw.com](mailto:pgs@gsjw.com)

Monica Tranel, Esq.  
Montana Consumer Counsel  
PO Box 201703  
111 North Last Chance Gulch, Suite 1B  
Helena MT 59620-1403  
[mtranel@mt.gov](mailto:mtranel@mt.gov)

Robert A. Nelson  
Montana Consumer Counsel  
111 North Last Chance Gulch, Suite 1B  
Helena MT 59620-1703  
[mtranel@mt.gov](mailto:mtranel@mt.gov)

Jason B. Williams, Esq.  
Sr. Vice President and General Counsel  
Blackfoot Telephone Cooperative  
1221 North Russell Street  
Missoula, MT 59808  
[jwilliams@blackfoot.com](mailto:jwilliams@blackfoot.com)

James Holbrook  
IBEW Local 206  
110 North Warrant Street, Suite 2  
Helena, MT 59601  
[James@ibew206.org](mailto:James@ibew206.org)

Geoff Feiss, General Manager  
Montana Telecommunications Assn  
208 North Montana Avenue, Suite 105  
Helena MT 50601  
[gfeiss@telecommassn.org](mailto:gfeiss@telecommassn.org)

Dennis R. Lopach, PC  
4 Carriage Lane  
Helena MT 59691  
[Dennis.Lopach@gmail.com](mailto:Dennis.Lopach@gmail.com)

Adrienne Kernaghan  
2808 Old US Highway 91  
Cascade, MT 59421  
[akernaghan@gmail.com](mailto:akernaghan@gmail.com)

Dr. Robert Loube  
Rolka, Loube and Saltzer Associates  
10601 Cavalier Drive  
Silver Spring, MD 20901  
[bobloube@earthlink.net](mailto:bobloube@earthlink.net)

William C. Ballard  
Locationage  
413 Saint Lawrence Drive  
Silver Spring, MD 20901-2626  
[bill.ballard@locationage.com](mailto:bill.ballard@locationage.com)

Dated this 13<sup>th</sup> day of April, 2015

Shelley Glueckert  
Shelley Glueckert