

Service Date: July 15, 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. ) DOCKET NO. D2014.11.91  
Mont. 38.5.3371(7)(b) )

**DATA REQUESTS CTL-001 THROUGH CTL-009 OF  
QWEST CORPORATION d/b/a CENTURYLINK QC  
TO THE MONTANA CONSUMER COUNSEL**

**CTL-001**

At page 7, beginning at line 3, Dr. Loube's pre-filed direct testimony states:

It is possible to compare the OOS clearance rate by type of infrastructure. I was able to compare the clearance by whether **the customer** is served by analog carrier systems, fiber to the node (FTTN) design, fiber to the home (FTTH) design, bonded copper pair and all other network designs. (emphasis in bold added)

However, at page 7, beginning at line 16, Dr. Loube's pre-filed direct testimony states:

The metric I use to compare service by infrastructure type is the number of OOS greater than 24 hours per 1000 **living units passed**. (emphasis in bold added)

- a. Please provide Dr. Loube's definition of "customer" and "living unit passed."

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- b. Is its Dr. Loubé's contention that all living units passed are also customers? Are there some living units that are not customers? Please explain. Are there some customers that are not living units? Please explain.
- c. Consider the following hypothetical scenario for the purpose of answering the question below:

Example	A	B
Customers	100	500
% Customers OOS>24	10%	10%
# of Customers OOS>24	10	50
Living Units Passed	1000	1000
%LU Passed OOS>24	1%	5%

The %Customers OOS>24 in examples A and B is the same. However, in example A, 100 (10%) of the 1000 living units are customers while in Example B, 500 (50%) of the 1000 living units are customers.

Does Dr. Loubé agree that if the percentage of OOS>24 remains constant (as in the example above), the greater the percentage of living units passed that are customers, the greater the percentage of OOS>24 will be? If not, why not.

**CTL-002**

Please provide all of the calculations used to produce each of the numbers in Table 1 on page 9 of 11, line 11 of Dr. Loubé's testimony. Please provide all calculations, workpapers, assumptions, excel spreadsheets, source data and any other materials used in the development of these numbers.

- a. Regarding Dr. Loubé's testimony, page 8, lines 1-5, please provide a list of the census blocks that "were assigned to CenturyLink QC" and the wire center each census block was assigned to.
- b. Regarding Dr. Loubé's testimony, page 8, lines 5-6, please provide the number of living units in each census block.
- c. Regarding Dr. Loubé's testimony, page 8, lines 6-12, please provide the census blocks to which each of the addresses associated with FTTN, FTTH, bonded pairs and analog circuit locations were assigned.

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- d. Regarding Dr. Loube’s testimony, page 8, lines 12-14, please provide the census blocks that each of the addresses with OOS greater than 24 -hours for the months of August 2014 to February 2015 were assigned.
- e. Regarding Dr. Loube’s testimony, page 8, lines 14-17 and page 9, lines 1-2, please provide the calculations described in the following sentence:

The numerator of the metric was determined by summing the number of OOS greater than 24 hours across all census blocks where the particular infrastructure was available, and the denominator was determined by summing the number of living units across all census blocks where the particular infrastructure was available and dividing that sum by 1,000.

- f. Consider the following single census block hypothetical scenario for the purpose of answering the question below:

Type of Infrastructure	Analog Circuit	FTTN	FTTH	Bonded Pair	Total
Customers served	10	30	0	10	50
% Customers OOS>24	10%	10%		10%	10%
# of Customers OOS>24	1	3		1	5
Living Units Passed in CB					1000
OOS>24/1000 Living Units Passed					5%

In this hypothetical, 5% of the 1,000 living units passed in the census block experienced OOS>24 but only 20% (1) of those OOS>24 is attributable to analog circuit.

Is it true that Dr. Loube’s formula for calculation of the OOS greater than 24 hours per 1,000 living units passed sums the number of OOS greater than 24 hours across **all** census blocks where analog circuit was **available**? If yes, does the formula exclude OOS>24 not attributable to analog circuit in the census block? If so, how?

**CTL-003**

- a. Regarding page 13, line 11 through page 14, line 2, please provide any evidence or data upon which Dr. Loube relies to support a conclusion that CenturyLink QC's out of service restoral times would be improved by "a more reliable network across the entire state of Montana."
- b. Consider that the Montana Public Service Commission's standard for network trouble reports is set forth in Admin. R. 38.5.3371(7)(a) and states that:

Service shall be maintained by the carrier in such a manner that the monthly rate of all customer trouble reports, excluding reports concerning interexchange calls or nonregulated customer premises equipment, does not exceed six per 100 local access lines per month per exchange.

Is it Dr. Loube's contention that CenturyLink QC's network across the state fails to meet this PSC reliability standard? If so, please explain how.

Please identify any network reliability standard that Dr. Loube contends CenturyLink QC's network fails to meet and the data upon which he relies to reach such conclusion.

**CTL-004**

At page 14, beginning at line 9, Dr. Loube's pre-filed direct testimony states:

Therefore, CenturyLink QC is not addressing the Commission's observation that chronic rural service quality problems are due to the poor condition of the CenturyLink QC network.

- a. Other than the Commission's observation, does Dr. Loube have an independent factual basis for concluding:
  1. CenturyLink QC has chronic rural service quality problems and
  2. Such problems are due to the poor condition of the CenturyLink QC network?
- b. If so, please identify the data upon which Dr. Loube relies for that factual basis and provide any analysis of the condition of CenturyLink QC's rural network that Dr. Loube performed.

**CTL-005**

Regarding MCC Confidential Exhibit 5, please provide a reference for the specific source for each of the numbers in the “material,” “non-material,” and “number of units” columns. If the data is from the FCC’s CAM, please provide a specific reference to where the data resides in the FCC’s CAM model.

**CTL-006**

Beginning at page 16, line 6 through page 17, line 15, Dr. Loube proposes an alternative plan consisting of five numbered elements. Please provide Dr. Loube’s estimate of how much it would cost to perform each of the tasks described in the numbered five elements. Please provide all data workpapers and used to estimate the cost.

**CTL-007**

Beginning at page 27 line 10 Dr. Loube’s direct testimony reads:

I am concerned that CenturyLink QC estimates may be unreasonably high. I developed alternative estimates of the cost of upgrading the connections between the customers to the wire centers. My estimates range between \$34 million and \$54 million.

Please provide each of Dr. Loube’s estimates broken down by wire center.

**CTL-008**

Beginning at page 17 line 16 Dr. Loube’s direct testimony reads:

In addition I highly recommend that CenturyLink QC accept the FCC’s CAF II offer which will facilitate the above recommendations.

Beginning at page 29 line 2 Dr. Loube’s direct testimony reads:

I recommend that CenturyLink QC should replace its analog carrier systems in census blocks where the FCC is offering CAF II.

Does Dr. Loube recommend that CenturyLink QC replace its analog carrier systems in census blocks where the FCC is offering CAF II if CenturyLink QC does not accept the model-based statewide CAF II offer in Montana?

**CTL-009**

At page 18, beginning on line 12, Dr. Loube's direct testimony reads:

The additional tasks included in the alternative plan are to focus on the underperforming wire centers over the six years of the CAF II program. For each selected wire center, the additional tasks would include....

- a. Please identify each and every "underperforming" wire center.
- b. Please describe the criteria Dr. Loube uses to identify "underperforming" wire centers.
- c. Please provide all data and analysis Dr. Loube used to identify the "underperforming" wire centers.
- d. Please identify the "selected" wire centers.
- e. Please describe the criteria Dr. Loube uses to select the wire centers identified in d.
- f. Please provide (1) all data Dr. Loube used to select the wire centers and (2) describe all analysis he used in the applying the data to reach his conclusions.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that true and correct copies of the foregoing were served on July 15, 2015, electronically and by us mail, addressed as follows:

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