

May 23, 2016

**VIA EMAIL AND OVERNIGHT DELIVERY**

Mr. Darrell Nitschke  
Executive Secretary  
North Dakota Public Service Commission  
600 East Boulevard Avenue, 12<sup>th</sup> Floor  
Bismarck, ND 58505-0480

**Re: Public Service Commission v. Qwest Corporation  
ND PSC Case No. PU-15-677  
OAH File No. 20160193**

Dear Mr. Nitschke:

Enclosed for filing are the original and seven copies of Qwest Corporation dba CenturyLink QC's Answer regarding the above-referenced matter.

Sincerely,

  
Jason D. Topp

JDT/bardm

Enclosures

cc: The Honorable Patrick J. Ward (via certified mail)  
Mr. Mitchell Armstrong (via certified mail)  
Mr. Brian Schmidt (via certified mail)  
Mr. Paul Sanderson (via email)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of May, 2016, Qwest Corporation dba CenturyLink QC's Answer was served upon the following parties as indicated below via electronic delivery, overnight delivery or certified mail by placing true copies in postage paid envelopes addressed to the parties below and by depositing said envelopes in the United States mail at Minneapolis, Minnesota:

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North Dakota Public Service Commission  
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Dianne Barthel

**STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION**

Public Service Commission,	)	Case No. PU-15-677
	)	
Complainant,	)	
	)	<b>QWEST CORPORATION DBA</b>
-vs-	)	<b>CENTURYLINK QC'S ANSWER</b>
	)	
Qwest Corporation,	)	
	)	
Respondent.	)	

Qwest Corporation dba CenturyLink QC (CenturyLink) submits this answer to the complaint served by the Public Service Commission (PSC) on April 25, 2016.

**Introduction**

The allegations of the complaint identify a number of service issues that have occurred, primarily in Western North Dakota. These customers are, for the most part, in remote areas. The time it takes to repair services can be longer than in a more densely populated area because it takes longer for a technician to physically reach the customer, there is more plant that needs to be inspected in order to isolate trouble, and it can take longer to obtain replacement parts. These issues associated with density have increased over time due to customers' choosing the services offered by CenturyLink's wireless and wireline competitors.

Over the last 10 years, at a time when North Dakota's population was growing, CenturyLink has lost over 57% of the access lines it previously served. As a result, the number of CenturyLink customers served per square mile has been halved. Put another way, the average distance between CenturyLink customers in North Dakota has doubled. Competitive impacts have been felt across the state and not just in more urban areas. In fact, in Belfield and Dickinson, for example, less than 1 in 3 and 1 in 10 households, respectively,

purchase CenturyLink service. Unlike other neighboring providers, CenturyLink does not receive traditional federal high cost support to serve customers in North Dakota.

CenturyLink disagrees with the underlying theme of the complaint that it has shown a pattern of repairing issues only after receiving complaints from the PSC. The repair records show that efforts to repair or restore service were underway and continued independent of Commission involvement.

In addition to issues of geography, CenturyLink technician shortages during 2014 and 2015 contributed to service issues in these areas. Those shortages included:

- **Mandan:** CenturyLink experienced a technician shortage in March of 2015 due to a terminal illness. This loss was particularly challenging because that technician was working with a newly hired technician that required training in November of 2014. New technicians must be trained, and it takes a period of time for them to become efficient, sometimes causing delays in service repairs. CenturyLink hired an additional replacement on September 28, 2015, who required similar training. The inability to find technically-skilled replacements of technicians is a common denominator statewide and nationally in all trade industries including electrical, plumbing, and HVAC. Newly hired non-technical employees require six weeks of classroom training and weeks of job shadowing to acquire basic job skills. Advanced cable trouble shooting and advanced services installation experience can require 2+ years of training.
- **Dickinson:** CenturyLink lost its most experienced technician in Dickinson for 45 days in May and June of 2015 due to a short term disability absence. The remaining technicians were both relatively new, one having six months on the job and the other two years.
- **Grand Forks:** CenturyLink experienced two vacancies from the second quarter of 2015. Two new technicians were added with a start date of April 4, 2016.
- **Sidney, MT:** CenturyLink provides service to many of the areas at issue in this complaint from its Sidney, Montana work center and experienced a shortage of technicians there in 2015. A total of five technicians now cover the Sidney, Montana area, compared to one dedicated technician through most of 2015. CenturyLink experienced a loss of valuable experienced technicians due to the oil boom and normal attrition in a very tough labor market to find resources to backfill. These technicians cover the very Eastern Montana areas and the Cartwright and Fairview areas of North Dakota.

CenturyLink attempted to hire contractors to fill the voids during the shortages in these rural markets with limited success. The market for contractors is very competitive at this time because of massive infrastructure projects associated with investments to expand broadband availability and the availability of Connect America Fund funding in addition to contractors responding to strike relief efforts for Verizon. CenturyLink explored all options, including looking for contractors that were not on CenturyLink's pre-approved vendor lists. CenturyLink had limited success hiring contractors.

Several additional issues impaired CenturyLink's ability to perform repairs. For example:

- **Bank Collapse of Square Butte Creek: Mandan:** In 2014, two separate sections of the Square Butte Creek collapsed, which required cable replacement and interfered with CenturyLink's ability to identify easement boundaries delaying permanent repairs.
- **Washouts**
  - Dickinson—early 2014
  - Mandan—2015
- **Lightning**
  - Dickinson—2014
  - Belfield—June 2015, July 2015, and August 2015
- **Heavy Rains**
  - Belfield—2015
- **Cable Cuts**
  - Belfield—June 2015
  - Cartwright—Heavy road construction activity drove chronic repairs. Road construction crews damaged several cables multiple times after agreements had been made to either install temporary facilities or better protect existing cables in place.
- **Long Repair Intervals/Missed Commitments**
  - Technician shortages prompted actual repairs outside of commitment dates.

- Technicians in western North Dakota were sometimes keeping repair tickets open for monitoring of service to ensure the issue was resolved. An example of this is with the Dale Hardy repair ticket on October 6, 2015. The technician picked it up on October 6 and replaced the bad channel card in the system restoring service. However, the technician did not close the ticket until October 14, 2015 to ensure no additional problems were detected in the system log. CenturyLink has since changed the course of action in 2016 to close the initial ticket upon initial restoral of service and create an internal tracking maintenance ticket for monitoring.

Despite these challenges, CenturyLink has taken significant steps to proactively address the issues identified in this complaint:

- Technicians dug up numerous defective hard pour splice cases used over the years on copper cables and performed dig and fixes and section replacements on several bad drops. CenturyLink spent over \$75K in cable placement contractors.
- CenturyLink brought a cable expert from CenturyLink's Missouri operations to North Dakota to evaluate issues in the more remote areas. The expert tested several bad leads for grounding and isolation and suggested changes to better protect the network. CenturyLink made those changes in the late third quarter and early fourth quarter of 2015.
- CenturyLink identified and repaired two problematic Subscriber Line Interface Circuit electronic cabinets in Belfield, North Dakota, which have caused most of the issues in the area. These circuits are currently stabilized.
- CenturyLink hired four new technicians in Eastern Montana with responsibility for the Sidney, Cartwright, and Fairview, North Dakota communities.
- CenturyLink hired a new technician in Mandan, North Dakota, on November 17, 2014, and an additional new technician on September 28, 2015.
- CenturyLink hired two contactors in October–November 2015 to help with cable rehabilitation at a labor cost of \$39,000.
- CenturyLink hired two new technicians in Grand Forks on April 4, 2016.

CenturyLink believes that it now has an adequate number of technicians to address the current volume of work on a going forward basis.

## **Response to Allegations in the Complaint**

1. CenturyLink admits the allegations in Paragraphs I-V.
2. CenturyLink admits that Paragraph VI summarizes portions of N.D. Admin. Code §69-09-05-07.
3. With respect to Paragraph VII, CenturyLink admits that the Commission received numerous complaints regarding quality of service issues and responds to those complaints as further set forth in this answer.
4. CenturyLink admits Paragraph VIII.
5. With respect to the allegations in Paragraph IX, CenturyLink responds to the specific allegations below. It denies that the instances constitute violations of N.D. Admin Code § 69-09-05-07 and/or N.D.C.C. 49-21-10.2. Furthermore, it affirmatively denies that a single repair constitutes two separate violations or that N.D.C.C. 49-21-10.2 sets forth a quality of service requirement for which the allegations could constitute violation.

In many cases, as is detailed below, the allegations paint a misleading picture of the repair issue because they identify the date the customer alleged to have experienced problems but do not identify the date on which the customer reported the issue to CenturyLink. CenturyLink cannot repair an issue it does not know about, and the time period before a customer reported an issue is irrelevant to the quality of CenturyLink's response.

With regard to the individual allegations, CenturyLink quotes the complaint for each allegation and responds below. Unless specifically and unequivocally admitted, each allegation should be considered denied.

1. Steve and Barb Snyder of Arvilla reported ongoing issues with their phone service, which included a constant humming noise and intermittent crackling. Qwest investigated several times but was unable to resolve the issue. The PSC received the subscriber complaint on August 28, 2015. After being informed the subscriber had made a complaint to the PSC, Qwest was able to resolve the problem that day.

**CTL Response:**

CenturyLink records show three repair tickets in this time frame. The first was issued on December 19, 2014, and the repair was completed the same day. The technician isolated and repaired bad cable pairs. The second ticket was repaired on August 28, 2015. The technician changed the pair to restore dial tone, and the customer was given a credit. A third ticket was opened on October 30, 2015, and was repaired on November 2. That repair involved isolating and repairing a bad cable splice.

2. Georgia Fisher of Dickinson reported ongoing issues with service since a lightning strike in 2014. The problems were a noisy phone line resulting in an inability to hear people on the other end of the line. She contacted Qwest several times about the issue, and also contacted the PSC on April 16, 2015. Repairs were finally made on May 12, 2015, which lasted for a while. The problems arose again on July 1 and were ongoing. Fisher was out of service again on October 1, 2015. Fisher reported the problems to Qwest, including on October 5, 2015. The problem was not cleared by Qwest until October 21, 2015.

**CTL Response:**

This repair ticket was opened on October 5, 2015 and closed on October 21, 2015. The system and cable were struck by lightning in 2014. The service resides on a 26-mile cable that feeds two working customers. Several sections of cable and terminals were repaired and replaced to fix service for the two remaining customers in this distribution area. In addition, over 700 feet of drop cable was replaced along with a full analysis of bonding and grounding. In response to customer feedback regarding noise on the line, the company rerouted service from the electronic cabinet system onto physical cable pairs to isolate any

potential cable problems. Area managers were in direct communication with the customer during the entire process. In some instances, the reported trouble was due to the subscriber's equipment and inside wiring. The customers' inside wiring was replaced at no cost to the subscriber to rule it out as the source of the trouble. The POTS service is working, and the company confirmed it meets test margins for dial tone.

3. Paul Sandstrom of Emerado experienced trouble with his phone service beginning September 3, 2015. The trouble was reported to Qwest immediately and several dates were set and confirmed for a technician to investigate the problem, but the technician did not keep the appointments. On September 25, Qwest addressed the issue by running a temporary drop until the cable could be dug up and respliced for a permanent fix.

**CTL Response**

CenturyLink records show four repair tickets on this line.

Received Date:	December 28, 2014	Completed Date:	December 28, 2014
	March 9, 2015		March 10, 2015
	September 4, 2015		September 11, 2015
	September 14, 2015		September 22, 2015

These tickets involved electronic cabinet system issues. CenturyLink found replacement parts and replaced those parts. Workforce issues contributed to the long repair intervals in September of 2015.

4. JL Johnson Bridal of Dickinson reported trouble with its service because it was unable to receive any calls. The issue was ongoing for approximately one year and would recur about every other week. A repair ticket was finally assigned for August 18, 2015, (the day the PSC contacted Qwest) and the repairs were completed on or about September 14, 2015.

**CTL Response:**

This repair required a long bore under a large concrete slab. CenturyLink was required to place a temporary cable on the ground to serve this customer on January 7, 2015. CenturyLink could not fix defective cable in the winter conditions due to frost conditions and

inability to access cable. CenturyLink hired a contractor as soon as one was available to perform the necessary bore. Final repairs were completed on October 13, 2015 at a cost of \$11,394.00 for 842 feet of directional boring of a 50 pair cable.

5. Sandy Ficek of Dickinson experienced on and off outages beginning in July 2015. Washout issues resulted in phone outages from July 8-20, October 2-20, and October 23-28, which were not promptly corrected. A temporary line was laid aboveground on or about October 28, 2015, but service was scratchy. The temporary cable was buried the week of November 13, but trouble was discovered in the line. An excavation was scheduled around the week of December 7, 2015.

**CTL Response:**

CenturyLink opened the original repair ticket on March 14, 2014, and closed it on March 19, 2014. A wash out early in the year necessitated an aerial solution employing two H-braces on the fence, an industry-accepted solution. The temporary solution remained in place until the permanent fix was installed. The permanent fix included boring under the first washout in which erosion damaged the original cable. A second bore was required under an additional washout in which erosion damaged her cable. The third and final repair required technicians to dig up and troubleshoot a wet splice resulting from the excessive rain and replacing an additional 3,392 feet of buried service drop. The customer remained apprised of the issues and progress during the entire construction process. The resultant muddy conditions as a result of the washout caused a delay due to lack of access to the site. CenturyLink records reflect over \$11,000 in outside contractor costs associated with this project:

6. Barb Glick of Dickinson was without phone service beginning July 23, 2015. Service was not promptly restored until after the PSC informed Qwest it had received a complaint. Service was restored on July 31, 2015.

**CTL Response:**

This repair involved cut cables and card issues. The first repair ticket involving a cut cable was opened on July 24 and closed with the other tickets on a cable fail on July 24, 2015 when the cable was fixed. The second repair ticket was opened on July 30, 2015 when it was discovered the customer was still out of service due to card problems within an electronic cabinet. CenturyLink closed the second repair ticket on August 1, 2015.

7. Dale Johnson of Cummings (Mayville exchange) experienced trouble with his service, including a loud hum on the line and the phone only ringing once with a delay hearing the other person on the line. The PSC representative who took Mr. Johnson's complaint called Mr. Johnson and experienced the delay and humming noise. These issues had been ongoing since approximately June 17. The service was repaired on July 20, 2015.

**CTL Response:**

CenturyLink opened a repair ticket on July 8, 2015, and completed the repairs on July 20, 2015. A cable needed to be repaired at the cross-connect cabinet. The delays were caused by technician vacancies and the inability to find replacement technicians.

8. Dale Hardy of Center reported quality of service issues lasting for years. When he called the PSC to report the issues on October 6, 2015, there was static and clicking noises on the line. He reported not even having a dial tone most of the time. He called Qwest many times but was never able to get the issue fixed. The PSC relayed Hardy's complaint to Qwest on October 6, 2015, and the service was repaired on October 14, 2015.

**CTL Response:**

CenturyLink records show a repair ticket opened on July 26, 2015 that was closed on August 4. A second ticket opened on October 6, 2015 and closed on October 14, 2015. These issues arose because the service cable was washed out in the river. Temporary cables were laid along fence until an easement was established for permanent replacement.

One mile of 25 pair cable along the new reroute was laid to complete the service repair on December 3, 2015.

9. Laurie Roedeske of Cartwright reported ongoing issues with quality of service, dating back to August 2015. A repair was attempted on September 28, 2015, but there remained so much static in the line that it couldn't be used. In addition, the phone would ring even when nobody was calling. After numerous contacts back and forth with Qwest, the repair was completed on November 6, 2015.

**CTL Response:**

This customer's trouble ticket opened on July 29, 2015 and was resolved/cleared on August 6, 2015. The customer contacted the company again on August 14, 2015 and the repair was completed on August 29, 2015. Additional repair tickets were opened in September and October of 2015 which were finally closed on November 6, 2015.

In addition to labor shortage issues delaying repairs, CenturyLink records indicate that there were storms in the area that caused issues; and in addition, road crews cut cable in this area on several occasions, causing more outages.

10. Margaret Denowh of Cartwright reported trouble with her phone service beginning August 13, 2015. A repair was scheduled to occur on September 18, 2015. The PSC informed Qwest of the complaint on August 17, 2015, and the repair was then completed on August 22, 2015.

**CTL Response:**

The delay was due to issues hiring and retaining employees in the area. The area is currently fully staffed by CenturyLink technicians.

11. James Gullickson of Cartwright experienced trouble when his phone service stopped working on July 29, 2015. Several calls were made to Qwest, and assurances were made that a technician would be coming to address the issue. When no technician arrived, the trouble was reported to the PSC on August 14, 2015. Repairs were not made until September 4, 2015.

**CTL Response:**

The delay was due to issues hiring and retaining employees in the area. The area is currently fully staffed by CenturyLink technicians. A \$25 credit was issued to the account.

12. Jason Rau of Cartwright experienced trouble when his phone service was out for over a month from August to September 2015. Service was not restored until September 2, 2015.

**CTL Response:**

A non-CenturyLink contractor damaged network facilities impacting multiple subscribers. The subscriber did not contact the company to report the outage or open a repair ticket. CenturyLink personnel opened a ticket for him to ensure his service was restored. Once the cable damage was repaired, additional work was necessary to restore the subscriber's service. There were delays due to issues hiring and retaining employees in the area. The area is currently fully staffed by CenturyLink technicians.

13. Georgianne Zastoupil of Belfield experienced an outage for about six weeks as of May 27, 2015. A repair was not completed until June 1, 2015.

**CTL Response:**

On the afternoon of April 27, 2015, the subscriber notified the company of the service outage. Due to limited resources, a technician was not available until the following week. It took a few days of troubleshooting to isolate the source. After the trouble was isolated, a work request was submitted on May 11, 2015, and the team was dispatched to dig up the damaged portion of the cable. The next day, after emergency locates were verified, the repair to the cable section was completed, and service was restored but there was static on the subscriber's line. The ticket remained open while the technicians isolated the source of the static which was found to be cable buried under railroad right-of-way. This required a permit and approval for work to continue. The permit and approval were secured, but the

repair was delayed an extra day while Sprint located its fiber cable which proved problematic because it is was buried approximately 6 feet below ground level. Once located, a new cable was placed under the tracks, and the issue was resolved. CenturyLink closed this ticket on June 1, 2015. The subscriber was issued a credit in the amount of \$154.92 on May 27, 2015 for two months of service due to the service outage and another credit in the amount of \$52.88 on June 25, 2015 due to the cable cut. The cost of this repair exceeded \$10,000.

14. Curt Miller of Belfield experienced trouble when his phone did not work for approximately one month as of August 6, 2015. Service was not restored until August 18, 2015.

**CTL Response:**

Due to heavy rains, it was difficult to isolate the source of trouble on this line. The service was restored on August 18, 2015, and a credit was issued to subscriber's account.

15. Jerry Anheluk of Belfield experienced trouble when his service was not working for approximately one month as of August 4, 2015. After the PSC reported the issue to Qwest on August 4, repairs were made that day.

**CTL Response:**

There was no trouble ticket on record by CenturyLink for Mr. Anheluk when the Commission called on August 4, 2015. Anheluk's service outage was related to an outage which technicians were already working on affecting other customers. All customers affected were notified. The technician reset the electronic cards on August 4, 2015 to restore service. The cause of outage is not known.

16. Bonnie Reisenauer of Belfield was out of service for approximately one month as of July 7, 2015. Previously, her service would be in and out and she had reported the trouble to Qwest. When the PSC informed Qwest it had received a complaint on July 9, 2015, repairs were made on July 10.

**CTL Response:**

Lightning damaged the power feed, cards and office cards. This ticket was attached to a fail (cable ticket) with several customers in the area. The ticket was opened on July 2, 2015 and closed on July 10.

17. Dan and Susan Hutzenbiler of Belfield experienced trouble when their phone service stopped working on June 19, 2015. The service was not restored until July 10, 2015.

**CTL Response:**

Lightning damaged the power line to the cabinet servicing this customer. Once CenturyLink identified the source of the trouble, it restored service on July 8, 2015.

18. JoAnn Bang of Belfield experienced continuing problems with her telephone service in June 2015. She notified Qwest of an outage on or about June 9, 2015. On June 18, a temporary aboveground wire was placed, restoring service. On August 12, 2015, her telephone service was out again. The problem was related to gophers chewing on the wire. After the PSC relayed the complaint to Qwest, the service was restored by fixing the temporary line on August 14. Qwest indicated the buried line could not be fixed until it has technicians available.

**CTL Response:**

The subscriber notified CenturyLink on June 9, 2015. The source of the trouble was isolated to a 0.5 mile long cable chewed by gophers on June 16, 2015, requiring the cable to be excavated and repaired. To restore service, a temporary drop was placed on the ground, and the ticket was closed on June 18. A second repair ticket required an additional section of drop to be replaced/repaired. That ticket was opened on August 27, 2015 and was closed on August 28.

19. Scott and Patty Hutzenbiler of Belfield reported ongoing issues with their telephone service with the most recent issues beginning in April 2015, and worsening since that time. Despite making requests to Qwest and work orders being issued, the troubles were not corrected. In July 2015, they experienced an outage. Following the repairs, the phone lines seemed to be crossed with

their neighbors. Several calls were made for a repair without a technician addressing the problem. On October 1, 2015, the PSC relayed the Hutzenbilers' complaint to Qwest and a repair ticket was then issued for October 2, 2015. On October 7, 2015, there was another outage reported to the PSC, which was addressed that day.

**CTL Response:**

CenturyLink records show five relevant trouble tickets. The first ticket opened on June 22, 2015 and was closed on June 23 for defective cable pair. The second ticket was received on June 29 and closed on July 10. The source of the damage was lightning. On July 15, a credit was applied to the account for two months of service in the amount of \$86.02. It was determined that the repeater and central office cards needed to be replaced due to the lightning. Once the cards were sourced later in the week, they were replaced and the service was repaired. A second ticket was opened for monitoring and then closed on July 10, 2015. The third ticket was received on September 24, 2015 and closed October 1. The problem was caused by human error due to the cable pair pinched in door causing system to go down. The fourth ticket opened on October 2 and closed on October 5. CenturyLink found no trouble. The fifth ticket was received on October 6 and closed on October 7. The issue was caused by a grounded pair.

20. Dwight and Teresa Hecker of Fairfield experienced an outage in June 2015. After being reconnected, they experienced interference and intermittent dropping of calls beginning June 27. They were assured several times by Qwest that somebody would fix it, but nobody showed up. The issue was then reported to the PSC, which transmitted the information to Qwest on July 7, 2015. On July 8, 2015, the service was restored after it was determined there was a power issue. Following the repair, the phone service was noisy, and calls would disconnect. A repair ticket was issued on July 27, but a technician did not show up. After the PSC reported the problem to Qwest, Qwest reported the service was restored on July 28. As of July 30, 2015, the Heckers reported the problems were not resolved. Service was not restored until August 4. On August 22, they experienced another outage. Service was restored on August 25 after PSC involvement.

**CTL Response:**

This ticket was opened July 24, 2015 and closed on August 4, 2015. Power service to the electronic cabinet was damaged by lightning, and it took a few days to get an electrical contractor to replace the power feed and complete the repair.

A second ticket was opened on August 24, 2015 and closed on the August 25, 2015. The system was damaged by lightning resulting from troubles in the system needing isolation for resolution.

21. Jim Lowman of Fairfield experienced an outage beginning on or about June 24, 2015. He reported the problem to Qwest, but repairs were not made. After the PSC relayed his complaint to Qwest, his service was restored on July 8, 2015. After the repair, when a call was made, the service would work for about a minute and then disconnect. Service was restored on August 4, 2015. Another outage was experienced on or about August 22 and was restored again on August 25, 2015.

**CTL Response:**

CenturyLink shows a ticket was opened on June 27, 2014 and closed on June 27. This outage involved lightning damage that took a few days to isolate and resolve due to severe weather that hit the state resulting in delays and trouble accessing the customer premises.

A second trouble ticket opened on July 24, 2015 and closed on August 4. Power service to the electronic cabinet was damaged by lightning and it took a few days to get an electrician to replace the power feed and complete the repair.

Two other tickets involving lightning damage occurred on August 15, 2015 and August 25, 2015. Both tickets were cleared the same day. Those tickets involved lightning-caused problems in electronic cabinets.

22. Connie Karst of Fairview experienced trouble when her telephone service was disconnected when construction work was being performed on her house. When the work was completed, she requested the service be restored. Several dates were provided by Qwest to restore service, but service was not restored. She was out of service for approximately two weeks as of August 3, 2015. Service was restored on August 23, 2015.

**CTL Response:**

The subscriber contacted CenturyLink to request a move of company facilities for an addition to his house. The subscriber's building contractor cut the facilities to start the foundation work. CenturyLink records show that a ticket was received on July 28, 2015 that was closed on August 23, 2015. The delay was due to issues hiring and retaining employees in the area. The area is currently fully staffed by CenturyLink technicians.

23. Darrell and Kerry Finsaas of Fairview moved into a temporary residence. They requested their phone number to be switched to the temporary residence. The transfer order was not completed until July 9, 2015, at which point they had gone over a month without service. When they moved into the new residence, the service was disconnected. Arrangements were attempted to be made to install the new service beginning in August 2015, but service was not restored until the last week of October 2015.

**CTL Response:**

The original move order was taken on May 27, 2015 with a due date of May 29. The transfer was closed July 9, 2015. CenturyLink also received a repair order on September 4 that was closed on September 4. The delay was due to a combination of issues including a resource shortage due to issues hiring and retaining employees in the area and an order cancellation in error. The area is currently fully staffed by CenturyLink technicians. The installation fee was waived, and a \$36 credit was issued to the account. CenturyLink failed to route the necessary work to the correct department which caused the significant delay. Once the work request was properly identified, new pedestal and drop cables were placed to provide service.

24. Ronnie Hurley of Fairview was without service beginning August 17, 2015. Phone service was not restored until September 28, 2015. He experienced another outage on November 1, which was repaired on November 4, 2015.

**CTL Response:**

On August 17, 2015, a technician was dispatched to repair a cut 200-pair cable. On August 19, a service ticket was opened. On September 4, the technician was dispatched and determined that service was working. On September 28, a service ticket was opened and a temporary cable was placed between sections to restore service. The delay was due to issues hiring and retaining employees in the area. The area is currently fully staffed by CenturyLink technicians.

25. Phyllis Burns of Grafton experienced an outage on September 11. The outage was not corrected until September 23, 2015.

**CTL Response:**

The subscriber notified CenturyLink of the outage on September 15, 2015. A bad cable splice was identified and repaired, and the ticket was closed on September 23, 2015. A second ticket was received on September 30 and closed on October 6. A bad cable splice was repaired.

26. Gaylon Olson of Grand Forks experienced an outage for thirteen days as of June 22, 2015. Repairs were not made until June 27, 2015.

**CTL Response:**

This ticket was opened on June 11, 2015, and service was repaired on June 27, 2015. The problem was in buried service wire. Service was restored through a temporary facility on the June 27, and the customer received a credit for his time out of service. CenturyLink replaced 102 feet of service drop for a permanent repair at a later date.

27. Yvette LaPierre of Grand Forks contacted the PSC on September 3, 2015. She experienced an outage for almost two weeks at that point and had been informed service could not be corrected until September 20. After she indicated she would be calling the PSC, a technician was dispatched the next day and service was restored.

**CTL Response:**

This ticket was opened on August 26, 2015 and closed on September 3. A credit of \$44.92 was issued to the subscriber's account to compensate for the service outage and long interval. The delay was caused by workforce issues due to inability to find replacement technicians.

28. On August 3, 2015, John Dixon of Mandan contacted the PSC about ongoing issues with his service for a couple years, including outages and interference. The interference was observed during the conversation by an employee of the PSC. On August 7, 2015, several repeaters were replaced to restore service. On September 14, 2015, he experienced an outage. Service was not restored until September 28.

**CTL Response:**

CenturyLink records show a ticket was received on July 28, 2015 and closed on August 7, 2015. The Grassy Butte River experienced severe flooding in 2011 during the Missouri River flood which resulted in severe bank erosion impacting support of main, cross-country cable routes. In 2014, two separate sections of the river bank collapsed damaging sections of the cable requiring temporary rerouting. As a result of delays in establishing easement boundaries for replacement on the same route, the decision was made to bury one mile of new cable along the highway right of way to establish permanent service. Work was completed on the full project on December 3, 2015. Repairs totaled \$17,325.

6. CenturyLink denies the allegations in Paragraph X.

7. CenturyLink denies the allegations in Paragraph XI and specifically denies that N.D.C.C. 49-21-10.2 sets forth a quality of service requirement for which the allegations could constitute a violation.

8. CenturyLink denies the allegations in Paragraph XII.

9. CenturyLink avers that the allegations in Paragraph XIII quote a statute to which no response is required. CenturyLink denies that a civil penalty is appropriate.

10. CenturyLink admits the allegations in Paragraph XIV and alleges service was completed on April 25, 2016.

11. With respect to the paragraph of the complaint which appears as a “Prayer for Relief” clause, CenturyLink denies such allegations and places upon the PSC the legal and factual proof which would justify the relief requested.

12. CenturyLink asserts the complaint fails to state a cause of action upon which relief can be granted.

13. CenturyLink asserts the claims asserted in the Complaint are barred, in whole or in part, by the doctrines of payment, release, offset and waiver.

14. CenturyLink asserts some of the claims asserted in the Complaint were the result of an Act of God over which it had no control, which bars or reduces the relief claimed in the Complaint.

15. CenturyLink asserts some of the claims asserted in the Complaint were caused by the acts of third parties over which it had no control, which bars or reduces the relief claimed in the Complaint.

16. CenturyLink reserves the right to assert any additional affirmative defenses and claims of avoidance as may be appropriate based upon the facts and issues disclosed during the additional investigation and discovery.

WHEREFORE, CenturyLink seeks the following relief:

1. Deny the relief requested in the complaint;
2. Find that CenturyLink has taken appropriate steps to address the issues raised in the complaint;
3. Dismiss the complaint with prejudice; and
4. Such other relief the Commission determines is appropriate.

Dated this 23rd day of May, 2016.

QWEST CORPORATION dba  
CENTURYLINK QC



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