



**Jason D. Topp**  
Assistant General Counsel  
(651) 312-5364

March 13, 2025

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

**Re: Griggs County Telephone Co. Leonard and Kindred Exchanges Public  
Convenience & Necessity -PU24-386  
Griggs County Telephone Co. Designation Eligible  
Carrier Application PU24-387**

Dear Mr. Kahl:

Enclosed please find Qwest Corporation dba CenturyLink comments in response to the application of Griggs County Telephone Co's application for a Certificate of Public Convenience and Necessity.

Please reach out if you require further information or have questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jason D. Topp".

Jason D. Topp

JDT//dmb

20 PU-24-386 Filed 03/13/2025 Pages: 3  
Response from Current ILEC

CenturyLink Communications, LLC  
Jason D. Topp, Assistant General Counsel

20 PU-24-387 Filed 03/13/2025 Pages: 3  
Response from Current ILEC

CenturyLink Communications, LLC  
Jason D. Topp, Assistant General Counsel

**STATE OF NORTH DAKOTA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**Griggs County Telephone Co.  
Leonard and Kindred Exchanges  
Public Convenience & Necessity**

**Case No. PU-24-386**

**Griggs County Telephone Co.  
Designated Eligible Carrier  
Application**

**Case No. PU-24-387**

**Qwest Corporation dba CenturyLink QC's Response to Griggs County Telephone Company's Application for a Certificate of Public Convenience and Necessity**

Qwest Corporation dba CenturyLink QC ("CenturyLink")<sup>1</sup> submits these comments in response to the application of Griggs County Telephone Co. ("Griggs") application for a Certificate of Public Convenience and Necessity ("CPCN") as an incumbent local exchange carrier ("ILEC") for the Kindred and Leonard exchanges (the "Requested Exchanges").

While CenturyLink disputes many of the assertions contained in the petition, CenturyLink supports the Application filed by Griggs. North Dakota residents are best served by fiber technology where possible. Given that Griggs asserts it has built fiber to every resident in these exchanges and is willing to connect future residents, CenturyLink believes that this petition is in the public interest and will avoid unnecessary investment in facilities to serve customers through a technology that is reaching the end of its useful life.

Griggs suggests that CenturyLink be considered a Competitive local exchange company if this petition is granted. Converting CenturyLink to a competitive local exchange company at this time may pose operational challenges. For example, making federal filings become extremely complicated when the carrier has multiple designations. While such challenges may well be

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<sup>1</sup> The Commission Notice asserts that these exchanges are currently served by CenturyLink Communications LLC. The correct entity is listed here.

resolved, there is no need to do so to grant this application. CenturyLink has a certificate of authority outside its incumbent territory in other states and does not operate as a CLEC in those states.

### **CONCLUSION**

CenturyLink supports the application of Griggs County Telephone Company and requests that any order approving the application make no specific findings on CenturyLink's status in these areas. CenturyLink does not request a hearing but is willing to participate (either formally or informally) if there are any concerns or questions about its legal status in the requested exchanges moving forward.

QWEST CORPORATION DBA  
CENTURYLINK QC

/s/ Jason D. Topp \_\_\_\_\_

Jason D. Topp  
Assistant General Counsel  
200 South 5<sup>th</sup> Street, Room 2200  
Minneapolis, MN 55402  
(651) 312-5364  
[Jason.topp@lumen.com](mailto:Jason.topp@lumen.com)