

STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION

**Red River Telephone Association
Wahpeton Exchange
Public Convenience & Necessity**

Case No. PU-25-185

**Red River Telephone Association
Designated Eligible Carrier
Application**

Case No. PU-25-190

**Qwest Corporation dba CenturyLink QC's Response to Notice of Opportunity for
Consolidated Hearing**

Qwest Corporation dba CenturyLink QC ("CenturyLink")¹ submits these comments in response to the application of Red River Telephone Association ("Red River") for a Certificate of Public Convenience and Necessity ("CPCN") as an incumbent local exchange carrier ("ILEC") and for designation as an eligible telecommunications carrier ("ETC") for the Wahpeton exchange.

On June 4, 2025, the Commission issued a notice identifying several issues in these proceedings, many of which relate to the fitness of Red River to be an ETC. CenturyLink takes no position on those issues. Two issues relate to CenturyLink. In Case No PU-25-185, the fourth item listed is:

4. Whether, upon granting a certificate of public convenience and necessity to Red River to provide local exchange services in the area currently known as the Wahpeton exchange, CenturyLink's certificate of public convenience and necessity should be relinquished or transferred to competitive local exchange service?

In Case No. PU-25-190, issue 4 states:

5. Whether, upon designation of Red River as an ETC for the Wahpeton exchange, CenturyLink's designation as an ETC for the Wahpeton exchange should be relinquished or transferred to competitive local exchange service?

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

CenturyLink currently serves a significant number of customers in this exchange. At the end of 2024, CenturyLink served 228 voice customers and a significant number of broadband customers. The Wahpeton exchange is a part of a cross border exchange that serves part of Minnesota. CenturyLink must have the authority to continue to serve these customers.

Nonetheless, CenturyLink does not object to the commission assigning Red River as an incumbent local exchange carrier and an eligible telecommunications carrier in this exchange. To have ILEC status recognized by the FCC, Red River must seek FCC approval of its ILEC designation and there may be other steps necessary to complete the process. CenturyLink is willing to cooperate with those efforts,

CONCLUSION

CenturyLink does not oppose the application of Red River and requests that any order approving the application ensure CenturyLink continues to be able to serve its customers in these exchanges. 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.

Dated this 18th day of July, 2024.

QWEST CORPORATION d/b/a CENTURYLINK QC

/s/ Jason D. Topp _____

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July 2025, the foregoing *Qwest Corporation dba CenturyLink QC's Response to Notice of Opportunity for Consolidated Hearing* was served upon the following party:

Mr. Steven Kahl
Executive Secretary
North Dakota Public Service Commission
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