

**BEFORE
NORTH DAKOTA PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF THE PETITION
OF QWEST CORPORATION D/B/A
CENTURYLINK QC SEEKING PARTIAL
RELINQUISHMENT OF
ITS DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER
IN THE LEONARD EXCHANGE**

DOCKET NO.

**PETITION FOR PARTIAL RELINQUISHMENT OF ETC DESIGNATION IN THE
LEONARD EXCHANGE**

Qwest Corporation d/b/a CenturyLink QC ("CenturyLink"), pursuant to Section 214(e)(4) of the Communications Act of 1934, as amended, and the rules and regulations of the Federal Communications Commission ("FCC") and the North Dakota Public Service Commission ("Commission"), hereby petitions the Commission for an order relinquishing its designation as an Eligible Telecommunications Carrier ("ETC") in the Leonard Exchange¹ in North Dakota ("Petition").

INTRODUCTION

CenturyLink is currently designated as an ETC in the Leonard Exchange in North Dakota. Because CenturyLink serves a limited number of customers in the exchange, another provider has obtained ETC certification and designation as an ILEC in the exchange, and because CenturyLink believes it can serve customers more efficiently and effectively through a new wireless voice over internet protocol ("VoIP") product known as Connected Voice with Air-Line, CenturyLink seeks to relinquish its ETC designation in this exchange.

¹ See map of the Leonard Exchange attached as Exhibit 1.

CenturyLink is not seeking to modify its Certificate of Public Convenience and Necessity. It is possible customer needs may arise that require CenturyLink service moving forward. Therefore, it prefers to maintain its ability to serve the area in the future.

All correspondence, communications, pleadings, orders, and decisions relating to this Petition should be addressed to:

Jason D. Topp
Assistant General Counsel
200 S. 5th St., Room 2200
Minneapolis, MN 55402
Tel: 651-312-5364
Email: jason.topp@lumen.com

I. LEGAL BASIS FOR RELINQUISHMENT

Section 214(e)(4) of the Communications Act, codified at 47 U.S.C. § 214(e)(4), sets forth the requirements for relinquishment of an ETC designation:

- A State Commission . . . shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier.
- An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission . . . of such relinquishment.
- Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State Commission . . . shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carriers will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining telecommunications carrier.

Essentially, these requirements consist of two components: (1) notice of relinquishment and (2) the presence of another ETC with the facilities, or the ability to build the facilities, needed to continue to serve any affected customers. Both requirements are met in this case. Because this situation is straightforward and because CenturyLink will soon file with the FCC

for authorization to discontinue providing legacy voice service in the Leonard Exchange,

CenturyLink respectfully requests that the Commission issue an order effective October 6.

A. CenturyLink is Providing Advance Notice to the Commission

Consistent with 47 U.S.C. § 214(e)(4), CenturyLink is filing this petition in advance of its requested effective date of relinquishment meeting the requirement to provide advance notice to the Commission. In addition, affected subscribers will receive advance notice as described in subsection D below, which will be distributed more than 60 days prior to the proposed effective date of October 6, 2025.

B. The Leonard Exchange is Served by Another ETC that has Represented to the Commission that it has Built Facilities to the Entire Exchange

Griggs County Telephone Company, d/b/a MLGC, LLC, (“Griggs”) has obtained approval to serve as an ETC in the Leonard Exchange and has also been designated by the Commission as an incumbent local exchange carrier (“ILEC”) (See ND PSC Case Nos, PU-386; 387) for the Leonard Exchange. In its application seeking ETC and ILEC designations, Griggs asserted that it has completely built out the Leonard Exchange with fiber (Application, ¶ 4 – attached as Exhibit 2).

It is CenturyLink’s understanding, based on publicly available information, that:

- Griggs offers legacy TDM-based telephone service to customers within the Leonard Exchange.
- Griggs is ready and able to accept port requests for stand-alone voice service from CenturyLink customers interested in switching service providers in the Leonard Exchange.

- Griggs also offers stand-alone VoIP telephone service to customers in the Leonard Exchange.
- Griggs' stand-alone VoIP option includes an eight-hour battery back-up with its standard service and a more robust battery back-up is available for purchase.

C. No Additional Facilities Will Need to be Purchased or Constructed by the Remaining Eligible Telecommunications Carrier

To the best of CenturyLink's knowledge, the remaining ETC in the Leonard Exchange will not be required to purchase or construct additional facilities to continue to serve customers within the service area.

D. CenturyLink is Taking Extra Steps to Notify all Affected Customers

As of July 23, 2025, CenturyLink serves 17 voice customers and no broadband customers in the Leonard Exchange. CenturyLink will take all reasonable steps to help ensure a smooth transition for these customers to other products or other providers serving the Leonard Exchange. CenturyLink will also work with the Commission and Griggs to ensure a seamless transition for its customers.

After filing this petition, CenturyLink proposes to notify each customer in the Leonard Exchange that if they want to continue to receive voice telephone service after October 6, 2025, they have the option to: (1) port their service to another provider, e.g., Griggs or a wireless service provider offering a 4G LTE wireless service in the area; (2) purchase Connected Voice service with Air-Line from CenturyLink²; or (3) disconnect service. Attached as Exhibit 3 is the notice being sent August 1 to comply with federal requirements.

² Our review of wireless coverage in the area indicates that 13 of the 17 customers receive adequate wireless coverage to provide this service.

CenturyLink's customers will receive multiple notices through multiple channels. CenturyLink may follow up individually with the 17 remaining voice customers in the Leonard Exchange through phone calls, text messages, and/or emails, depending on the customer's preferred communication method. These communications will let customers know that (1) CenturyLink is discontinuing its legacy voice service in the customer's area; (2) there are multiple options exist for replacing the existing service; and (3) the customer may contact its chosen provider to obtain service. CenturyLink will provide a contact number of CenturyLink staff that customers can call for support with any issues as well as a toll-free number for customers interested in switching to Connected Voice with Air-Line.

CONCLUSION

For the reasons stated above, CenturyLink respectfully requests that the Commission grant this petition to relinquish its ETC designation in the Leonard Exchange in North Dakota.

Respectfully submitted,

/s/ Jason D. Topp

Qwest Corporation dba CenturyLink QC

By: Jason D. Topp

Assistant General Counsel

200 S. 5th St., Room 2200

Minneapolis, MN 55402

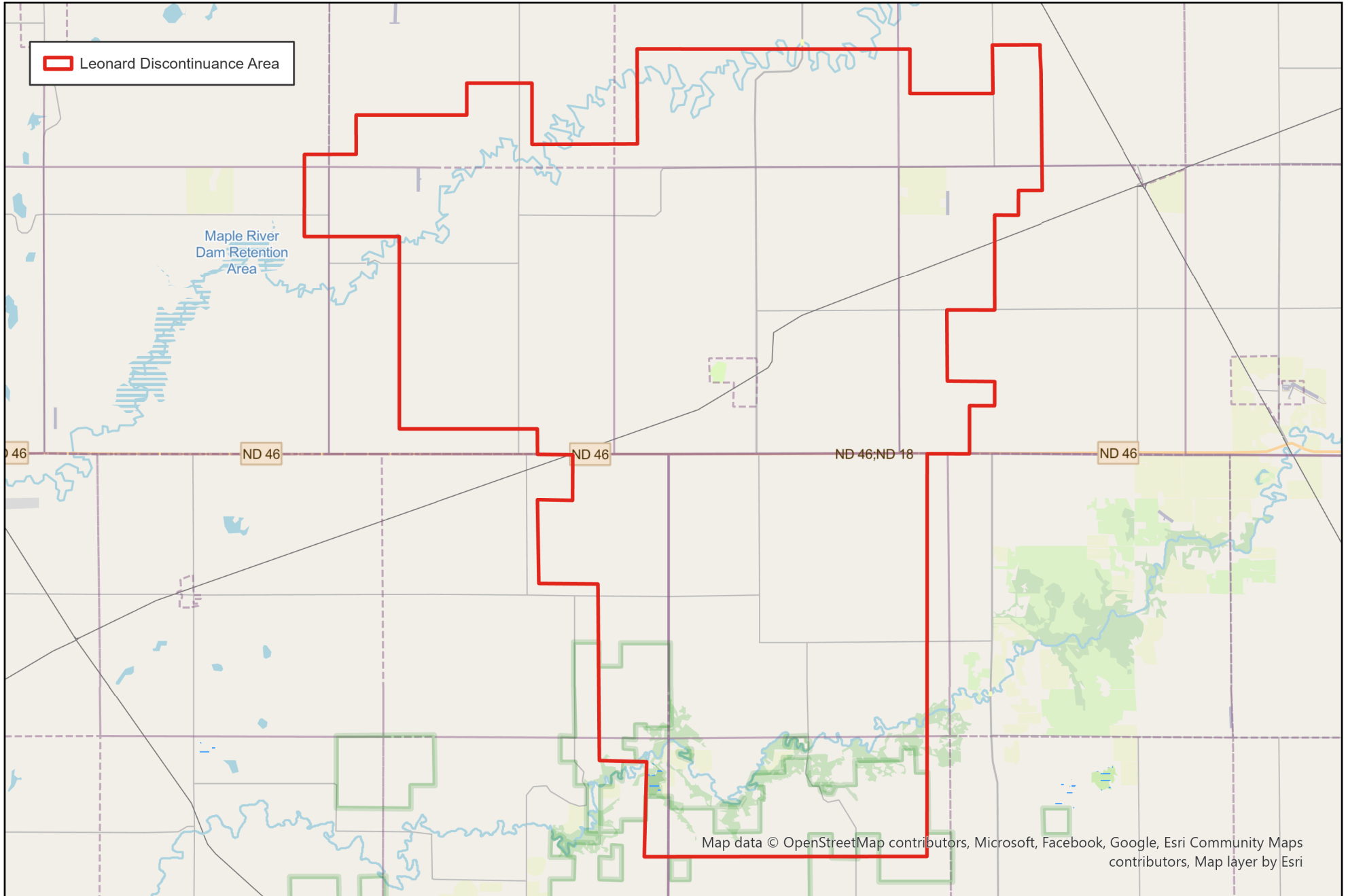
Tel: 651-312-5364

Email: jason.topp@lumen.com

Date: August 1, 2025

EXHIBIT 1

 CenturyLink® Leonard, North Dakota



Map data © OpenStreetMap contributors, Microsoft, Facebook, Google, Esri Community Maps contributors, Map layer by Esri

Boundaries shown are approximate. For verification of unique addresses or locations, contact your local CenturyLink representative. ©2025 Lumen Technologies, Inc.

EXHIBIT 2

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BENJAMIN H. DICKENS, JR.*
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ARTHUR BLOOSTON
1914 – 1999

*ALSO ADMITTED IN FLORIDA

December 23, 2024

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFKY
RETIRED

WRITER'S CONTACT INFORMATION

202-828-5562
sta@bloostonlaw.com

VIA EMAIL AND FED-EX

Mr. Steve Kahl, Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Ave., Dept. 408
Bismarck, ND 58505-0480

RE: Application of Griggs County Telephone Company for Designation as the Incumbent Local Exchange Carrier, Certificate for Public Convenience and Necessity, and Eligible Telecommunications Carrier Designation

Dear Mr.Kahl:

Griggs County Telephone Company (“Griggs”), by its attorneys, hereby files the above-referenced applications. The Applications request (i) designation of Griggs as the incumbent local exchange carrier; (ii) a Certificate of Public Convenience and Necessity; and (iii) Eligible Telecommunications Carrier Designation, all in the Leonard and Kindred exchanges of North Dakota. Enclosed for filing are the original and four (4) copies of the following,¹ which have been redacted to remove trade secret information:

- Application for Certificate of Public Convenience and Necessity and Request for Recognition as an Incumbent Local Exchange Carrier
- Application for Expansion of Eligible Telecommunications Carrier Designation
- Attachment 1: Application for Trade Secret Protection
- Attachment 2: Affidavit of Tyler Kilde, Griggs
- Attachment 3: Griggs Articles of Incorporation
- Attachment 4: Griggs Certificate of Good Standing
- Attachment 5: Maps of the Leonard and Kindred Exchanges
- Attachment 6: Financial Statements – TRADE SECRET

¹ An original plus four have been provided at the request of Commission Staff. Griggs will provide additional copies upon request.

In addition, one unredacted copy of these materials is enclosed under seal.

Please do not hesitate to contact the undersigned with any questions regarding these applications.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Dickens, Jr.", with a stylized, cursive script.

Benjamin H. Dickens, Jr.
Salvatore Taillefer, Jr.
Counsel to Griggs County Telephone Company

/encl

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

**Application for Certificate of Public Convenience and Necessity and Request for
Recognition as an Incumbent Local Exchange Carrier**

Pursuant to chapter 49-03.1 of the North Dakota Century Code (“NDCC”) and section 69-09-05-11 of the North Dakota Administrative Code (“NDAC”), Griggs County Telephone Company (“Griggs”) hereby submits this 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”). Due to its failure to maintain or upgrade its network in the Requested Exchanges, the Commission should treat the current ILEC – Lumen Technologies, Inc. (“Lumen”) – as having relinquished the Requested Exchanges from its study area and assign them to Griggs as an ILEC. In support hereof, the Griggs states as follows:

1. Griggs is a North Dakota corporation located at 301 Dewey St, Enderlin, ND, 58027. Pursuant to CPCNs issued by this Commission in PU-13-077, 13-251, and 13-330, Griggs has been engaged in the business of providing local exchange telecommunications service, exchange access, and other telecommunications services as an incumbent local exchange carrier (“ILEC”) in the following North Dakota exchange areas:

Exchange Name	Prefix
Binford	676
Cooperstown	797
Enderlin	437
Finley	524
McHenry	785
Sheldon	882

Griggs seeks to provide the same services provided in these exchanges to the Requested Exchanges.

2. Lumen is a Louisiana corporation headquartered at 100 CenturyLink Drive, Monroe, LA, 71203. Pursuant to a CPCN issued by the Commission in PU-00-030/13-235/04-160, Lumen has been engaged in the business of providing local exchange telecommunications service, exchange access, and other telecommunications services in, among other North Dakota exchange areas, the Requested Exchanges:

Exchange Name	Prefix
Leonard	645
Kindred	428

3. As required by Section 69-09-05-11.1 of the NDAC, Griggs attaches hereto as Exhibit 1 its Articles of Incorporation.

4. As required by section 11.2, Griggs attaches hereto as Exhibit 2 its balance sheet, income statement, and an independent accountant's financial opinion.

5. As required by section 11.3, Griggs respectfully submits that its long history of providing exceptional service to the to the exchanges listed in paragraph 1 – beginning as early as 1906 – demonstrates (i) the fitness and ability of the applicant to provide service; (ii) the adequacy of the proposed service; and (iii) the technical, financial, and managerial ability of the applicant to provide service. Griggs respectfully submits these requirements are further demonstrated by the fact that Griggs has 100% overbuilt Lumen in the Requested Exchanges with fiber through its wholly-owned subsidiary, MLGC, LLC (“MLGC”). According to Griggs’ records and market research, it has also captured approximately 95% of wireline voice subscribership¹ in the Requested Exchanges, as well as approximately 66% of the total subscribership (voice and broadband).

¹ This figure is included to address the fact that a significant portion of the customers in the Requested Exchanges have no landline service, and instead rely entirely on wireless service for voice.

6. The Commission should deem Lumen to have relinquished the Requested Exchanges. Upon information and belief, the vast majority of telecommunications complaints in the Requested Exchanges have historically been regarding Lumen's service, and Lumen has ceased maintaining its plant in the Requested Exchanges. As mentioned previously, Griggs believes it has captured approximately 95% of wireline voice subscribers,² and 66% of all subscribers (voice and broadband) in the Requested Exchanges, substantially replacing Lumen. Griggs has an outstanding reputation for customer service, and a demonstrated track record building, maintaining, and upgrading its network – a record that will continue in the Requested Exchanges. Accordingly, there is a demonstrated need for enhanced telecommunications services in the Requested Exchanges and a strong desire by those customers to benefit from Griggs' superior network and service.

7. In addition to the foregoing, the grant of Grigg's application and the treatment of the Requested Exchanges as relinquished by Lumen is in the public interest. As demonstrated, Griggs has substantially replaced Lumen as the ILEC in the Requested Exchanges and consumers' almost total migration from Lumen to Griggs is a testament to the superiority of Griggs' network and services. Furthermore, the FCC has held that ILEC treatment makes the LEC subject to the additional market opening requirements in section 251(c) of the Communications Act, which is objectively in the public interest.³ Lumen can still continue to operate in the Requested Exchanges as a CLEC.

² This figure is included to address the fact that a significant portion of the customers in the Requested Exchanges have no landline service, and instead rely entirely on wireless service for voice.

³ *In the Matter of Petition for Mid-Rivers Telephone Cooperative, Inc.*, 21 FCC Rcd 11506, 11514-11515 (2006). As mentioned previously, Griggs currently serves the Requested Exchanges through its unregulated subsidiary, MLGC. Thus, ILEC requirements are not currently applicable to Griggs in the Requested Exchanges.

8. The Commission has authority under section 49-21-01.7(7) of the NDCC to act upon applications for CPCNs as an ILEC.

9. Griggs asks that the Commission grant the instant application without a hearing if no interested party has requested a hearing on this application after receiving at least twenty (20) days' notice of opportunity to request such a hearing.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Tyler Kilde", is written over a horizontal line.

Tyler Kilde, President

Griggs County Telephone Company

Dated this 23 day of Dec, 2024

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

Application for Expansion of Eligible Telecommunications Carrier Designation

Pursuant to Chapter 49-21 of the North Dakota Century Code (“NDCC”), and in connection with its Application for Certificate of Public Convenience and Necessity (“CPCN”), Griggs County Telephone Company (“Griggs”) requests an expansion of its designation as an Eligible Telecommunications Carrier (“ETC”) to include the Leonard and Kindred exchanges (the “Requested Exchanges”). In support hereof, Griggs states as follows:

1. Griggs has been designated by the Commission as an ETC to receive universal service support under Section 214 and 254 of the Communications Act of 1934, as amended, (the “Act”) in the Binford, Cooperstown, Enderlin, Finley, McHenry, and Sheldon exchanges of North Dakota, where it is the incumbent local exchange carrier (“ILEC”). Griggs’ study area codes (“SAC”) are 381615 (Binford, Cooperstown, Finley, and McHenry) and 381622 (Enderlin and Sheldon).

2. Griggs has completely overbuilt the incumbent – Lumen Technologies, Inc. (“Lumen”) – in the Requested Exchanges with fiber. Griggs’ records and market research indicate it serves approximately 95% of the wireline voice subscribership¹ and 66% of the overall (voice and broadband) subscribership in these exchanges. Accordingly, the expansion of ETC designation by Griggs does not involve an acquisition of assets.

3. It is in the public interest to expand the Griggs ETC designated service area to incorporate the Requested Exchanges. Griggs already has ETC designation in portions of the

¹ This figure is included to address the fact that a significant portion of the customers in the Requested Exchanges have no landline service, and instead rely entirely on wireless service for voice.

Requested Exchanges through its wholly-owned subsidiary, MLGC, LLC (“MLGC”), by virtue of its participation in the Federal Communications Commission’s (“FCC”) Rural Digital Opportunity Fund (“RDOF”) program.² Furthermore, as indicated, Griggs has expanded its service beyond those portions of the Requested Exchanges for which it is already an ETC and has completely overbuilt Lumen (100%). Customers’ desire to switch to Grigg’s network is amply demonstrated by the fact that to date, Griggs’ records and market research indicates it has captured approximately 95% of the wireline voice subscribership³ and 66% of the overall subscribership in the Requested Exchanges. Griggs expects this trend to continue. The willingness of customers in the Requested Exchanges to migrate to Griggs for telecommunications services clearly demonstrates the public interest is served through the designation of Griggs as an ETC.

4. Griggs satisfies the requirements of Section 214(e) of the Communications Act for designation as an ETC in the Requested Exchanges because Griggs is a common carrier that will offer voice telephone service supported by universal service over its own facilities and will advertise the availability and rate for such service in the Requested Exchanges, including: (i) voice grade access to the public switched network; (ii) minutes of use for local service provided at no additional charge; (iii) access to emergency service provided by local government or other public safety organizations such as 911 and enhanced 911, to the extent the local government in the Requested Exchanges has implemented 911 or enhanced 911 systems; and (iv) Lifeline support and toll limitation service to qualifying low income consumers.⁴

² MLGC, LLC Designated Eligible Carrier Expansion Application, Order on Eligible Telecommunications Carrier Designation, North Dakota Public Service Commission Case No. PU-21-50, April 14, 2021.

³ This figure is included to address the fact that a significant portion of the customers in the Requested Exchanges have no landline service, and instead rely entirely on wireless service for voice.

⁴ 47 U.S.C. 214(e); Affidavit of Tyler Kilde.

5. The Commission has authority under NDCC § 49-21-01.7(13) to designate geographic service areas for ETCs to receive universal service support under sections 214 and 254 of the Act.

6. Griggs asks that the Commission grant the instant application without a hearing if no interested party has requested a hearing on this application after receiving at least twenty (20) days' notice of opportunity to request such a hearing.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Tyler Kilde", is written over a horizontal line.

Tyler Kilde, President

Griggs County Telephone Company

Dated this 25th day of Dec, 2024

Attachment 1

STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION

Application for Trade Secret

COMES NOW, Griggs County Telephone Company ("Griggs") and respectfully moves the Commission for entry of a trade secret protective order under section 69-02-09-01 of the North Dakota Administrative Code. The purpose of the requested protective order is to protect against public disclosure of trade secret information as defined by section 47-25.1-01 of the North Dakota Century Code. In support of the motion, Griggs states as follows:

1. A general description of the nature of the information sought to be protected.

Griggs wishes to protect from the disclosure of financial information contained in the Financial Statement (Attachment 7 in its entirety).

2. Explanation of why the information derives independent economic value.

The financial information could have economic value to potential competitors. This type of information in a competitive telecommunications marketplace is highly sensitive, and its public disclosure could place Griggs at an unfair competitive disadvantage.

3. An explanation of why the information is not readily ascertainable by proper means by other persons.

Griggs maintains the confidentiality of its financial information and does not make it readily available by proper means to competitors or the general public.

4. A general description of the persons or entities that would obtain economic value from the disclosure or use of the information.

If disclosed, Competitive Local Exchange Carriers could use the financial information against Griggs's interests.

5. A specific description of known competitors and competitors' goods and services that is pertinent to the tariff or rate filing.

Not Applicable.

6. A description of the efforts used to maintain the secrecy of the information.

Griggs's financial information is not disclosed to the public or to persons other than employees or authorized agents of the Company who need to know the information to fulfill their responsibilities or to third persons pursuant to an agreement to maintain the confidentiality of the information.

In accordance with section 69-02-09-02 of the North Dakota Administrative Code, Griggs provides one copy of the trade secret material in the enclosed sealed envelope labeled: ATTACHMENT 6-TRADE SECRET - PRIVATE.

Respectfully submitted,



Benjamin H. Dickens, Jr.
Salvatore Taillefer, Jr.

Counsel to Griggs County Telephone Company

Dated this 23 day of Dec., 2024

Attachment 2

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

**Affidavit of Tyler Kilde In Support of the Applications for Certificate of Public
Convenience and Necessity and for Expansion of Eligible Telecommunications Carrier
Designation**

I, Tyler Kilde, state under oath:

1. My name is Tyler Kilde, and I am the President of Griggs County Telephone Company, ("Griggs").

2. I submit this affidavit in support of Griggs's application for a Certificate of Public Convenience and Necessity ("CPCN") in the Leonard and Kindred exchanges (the "Requested Exchanges"), and to expand Griggs' study area and ETC designated geographic service area to incorporate the Requested Exchanges.

3. I am familiar with Section 69-09-05-12 of the North Dakota Administrative Code ("NDAC") which addresses ETC application requirements.

a. In support of NDAC Section 69-09-05-12 2.a: The proposed service area consists of the Requested Exchanges of North Dakota in their entirety. Lumen is the current incumbent local exchange carrier serving the Requested Exchanges, and Griggs has asked this Commission to treat Lumen as having relinquished the Requested Exchanges from its study area.

b. In support of section 69-09-05-12 2.b: Griggs currently meets all ETC obligations in its designated service area and will continue to meet those obligations in the Requested Exchanges. Griggs already meets all ETC obligations in portions of the Requested Exchanges due to its designation as an ETC for purposes of the Federal Communications Commission ("FCC") Rural Digital Opportunity Fund ("RDOF") program.

c. In support of section 69-09-05-12 2.c: Griggs will not require a waiver of any ETC requirements.

d. In support of section 69-09-05-12 3.a: Griggs is committed to providing service throughout the proposed service area to all customers making a reasonable request for service. I certify that (1) Griggs will provide service in a timely manner where the network passes the potential customer and (2) Griggs will provide service within a reasonable period of time if the potential customer is within the proposed designated service area but outside existing network coverage, if Griggs can provide service at a reasonable cost. Griggs will continue to provide outstanding customer service, and to upgrade and maintain its network in the Requested Exchanges.

e. In support of section 69-09-05-12 3.b: Griggs does not expect to receive federal high-cost universal service support in the first year following designation as ETC other than the RDOF support it already receives for portions of the Requested Exchanges.

f. In support of section 69-09-05-12 3.c: I certify that Griggs has a reasonable amount of backup power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spike resulting from emergency situations.

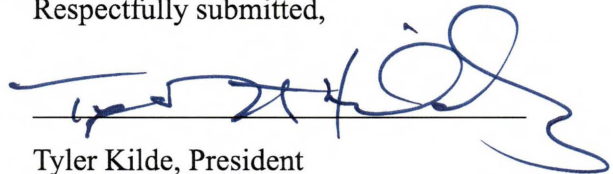
g. In support of section 69-09-05-12 3.d: I certify that Griggs will satisfy applicable consumer protection and consumer standards established by the Commission.

h. In support of section 69-09-05-12 3.e: I certify that Griggs will offer a local usage plan similar to the plan offered by Lumen.

i. In support of section 69-09-05-12 3.f: I acknowledge that the Commission has the authority to require Griggs to provide equal access to long-distance carriers in the event no other ETC is providing equal access in the proposed service area.

4. In consideration of the foregoing, Griggs asks the Commission to grant its request for expansion of its CPCN and ETC designation to incorporate the Requested Exchanges, which Griggs has asked the Commission to treat as having been relinquished by Lumen. Griggs has demonstrated its ability to meet all criteria for an ETC in its currently designated service area and will continue to do so for the expanded service area.

Respectfully submitted,



Tyler Kilde, President

Griggs County Telephone Company

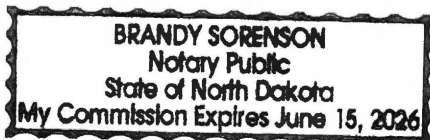
Dated this 23 day of Dec, 2024

STATE of NORTH DAKOTA

COUNTY of Cass

On this 23rd day of Dec, 2024, before me, a Notary Public in and for said County and State, personally appeared Tyler Kilde, known to me to be the person described in and executed within instrument and acknowledge to me that he executed the same.

SEAL



Notary Public

My Commission Expires: _____

Attachment 3

**AMENDED AND RESTATED ARTICLES OF INCORPORATION
OF GRIGGS COUNTY TELEPHONE CO.**

The undersigned, being the Secretary of Griggs County Telephone Co., hereby certify that pursuant to the unanimous vote of the shareholders at a meeting on February 21, 2013, the Corporation has adopted and approved the following:

Article 1. The name of the Corporation is: Griggs County Telephone Co.

Article 2. The name of noncommercial registered agent in North Dakota is:

Tyler Kilde
301 Dewey Street
Enderlin, ND 58027

Article 3. These Amended and Restated Articles of Incorporation shall be effective when filed with the Secretary of State.

Article 4. The purpose of the Corporation is to provide telecommunication services and other related business purposes.


Article 5. The Corporation shall be authorized to issue 500,000 shares with a par value of \$1.00 per share. The Board of Directors shall have the authority to establish one or more classes or series of shares, including the authority to create non-voting shares.

Article 6. The Board of Directors of the Corporation shall be made up of at least three and no more than seven members. The initial Board of Directors and Officers named below shall serve until their successors are duly elected and qualified:

Ray G. Brown, President
Tyler Kilde, Vice President
Joyce Brown, Secretary-Treasurer
Dion Brown, Director

Article 7. These Amended and Restated Articles of Incorporation were adopted by the shareholders on February 21, 2013.

The undersigned, as Secretary and person authorized by the Corporation to sign this amendment, has read the foregoing Amended and Restated Articles of Incorporation, knows the contents thereof, and believes the statements made thereon to be true.

 2/21/13
Joyce Brown, Secretary Date

Name of person to contact
about this document:

Timothy G. Richard
Serkland Law Firm
10 Roberts Street
P.O. Box 6017
Fargo, ND 58108-6017
(701) 232-8957
trichard@serklandlaw.com

Attachment 4

State of North Dakota SECRETARY OF STATE



Certificate of Good Standing of GRIGGS COUNTY TELEPHONE CO.

SOS Control ID#: 0000008997

Certificate #: 026366631-1

The undersigned, as Secretary of State of the state of North Dakota, hereby certifies that, according to the records of this office,

GRIGGS COUNTY TELEPHONE CO.

a Corporation - Business - Domestic was formed under the laws of NORTH DAKOTA and filed with this office effective November 20, 1906. This entity has, as of the date set forth below, complied with all applicable North Dakota laws.

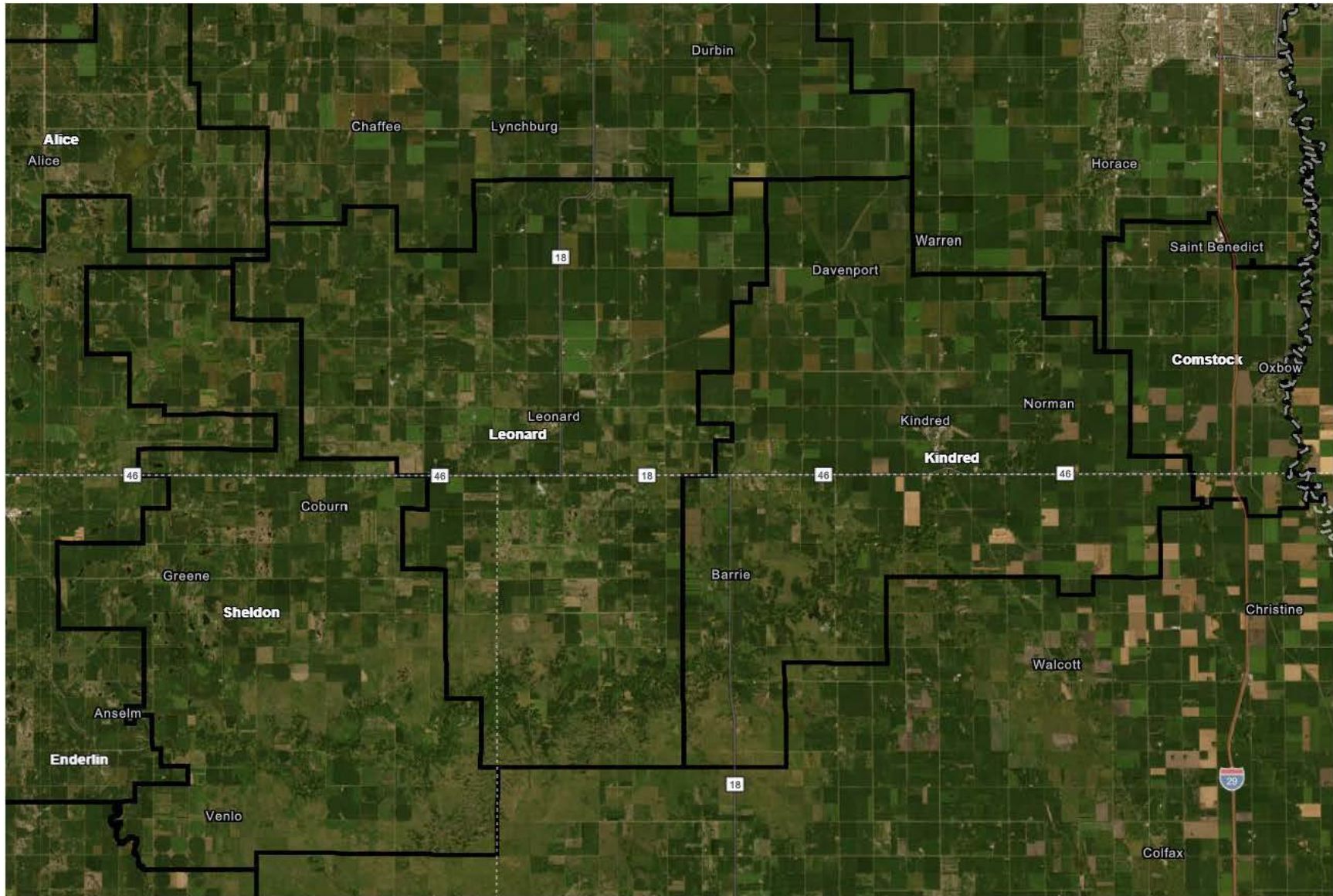
ACCORDINGLY, the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Good Standing.

DATE: December 23, 2024

A handwritten signature in black ink that reads "Michael Howe".

Michael Howe
Secretary of State

Attachment 5



Attachment 6

TRADE SECRET - PRIVATE

[REDACTED]

EXHIBIT 3



100 CenturyLink Drive
Monroe, LA 71203

<Date>

<Customer Name>
<Billing Address>
<Billing Address>
<Billing City>, < Billing State> < Billing ZIP>

Important Notice Regarding the Plan of Qwest Corporation d/b/a CenturyLink QC to Discontinue a Telecommunications Service

Dear «Customer name»,

You are receiving this notice because you currently subscribe to CenturyLink voice service, which provides you with voice-grade telephonic communications channels that can be used to place or receive one call at a time. We plan to **discontinue this service in Leonard, North Dakota on October 6, 2025**, or as soon after that date as authorized by the Federal Communications Commission and the state regulatory commission.

The good news is other voice services are available in your area, including MLGC LLC's traditional wired voice telephone service and voice over internet protocol (VoIP) service. More information about MLGC LLC's voice services can be found here: <https://mlgc.com/>. 4G LTE mobile wireless service is also available in your area from AT&T, Verizon, or T-Mobile.

You may also be eligible to receive **CenturyLink® Connected Voice with Air-Line™**, which delivers the reliability of a home phone backed by the power of today's tech—no internet connection needed. Call us at **1-888-884-2000** Monday through Friday, 9:00 a.m. – 7:00 p.m. or Saturday, 10:00 a.m. – 8:00 p.m. (CT) and let the agent know you'd like to switch to Connected Voice.

Action is required to maintain continuous service at your location and to keep your local telephone number. If you haven't selected another service or service provider to replace your CenturyLink voice service before **October 6, 2025**, your service will be disconnected at that time, assuming we have obtained necessary regulatory approvals. We urge you to choose another service or contact your new service provider as soon as possible. We are committed to working with you to ensure that you can transition your voice service without interruption.

Please contact Rick Gutierrez at 303-992-5828 if you have any questions or concerns about these changes.

We appreciate your business and hope that we have an opportunity to serve you in the future.

Sincerely,

Timothy S. White
Vice President, Network Implementation and Field Operations
CenturyLink

The following statement is required by FCC rules:

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Qwest Corporation d/b/a CenturyLink QC to Discontinue a Telecommunications Service. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.