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VIA ELECTRONIC MAIL

Mr. Victor Schock
Director, Public Utilities Division
North Dakota Public Service Commission
600 E. Blvd. Avenue, Dept 408
Bismark, North Dakota, 58505-0480

RE: Objection of Griggs County Telephone Company to Petition for Partial Relinquishment of ETC Designation by Qwest Corporation, PU-25-233

Dear Mr. Schock:

Griggs County Telephone Company (“Griggs”) hereby files its Objection to the Qwest Corporation a/k/a CenturyLink (“CenturyLink”) Petition in the above-referenced proceeding. CenturyLink seeks an Order from this Commission relieving it from its Eligible Telecommunications Carrier (“ETC”) obligations to its small number of current customers, quantified as approximately 17 customers. *See* Petition, p.4, n.2. At the same time, CenturyLink requests that its current Certificate of Public Convenience and Necessity (“CPCN”) remain intact should better opportunities arise in the future. Petition, p.2.

The Commission has previously addressed a series of CenturyLink complaints in CenturyLink’s Leonard and Kindred exchanges, ordering that these exchanges “are hereby relinquished” from CenturyLink’s study area and “are added” to Griggs’ rural study area. Order, Case Nos. PU-24-386; PU-24-387, issued March 26, 2025.

Griggs respectfully submits that new evidence revealed in CenturyLink’s latest filing, along with tangible evidence recently placed before the Commission, compels the cancellation of, or at minimum an investigation into, the rural exchanges in CenturyLink’s CPCN. Specifically, CenturyLink’s Petition demonstrates that it is no longer capable of delivering reliable service.

In its filing, CenturyLink acknowledges that it serves only 17 customers in the Leonard exchange—all voice customers with no broadband customers. Petition at p.4. The Petition describes several options available to customers, including service disconnection, a wireless

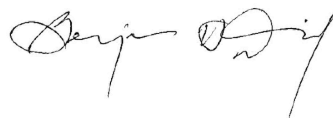
alternative called “Air-Line” from CenturyLink, or porting their number to Griggs or a wireless provider in the area. *Id.* A customer notice attached as Exhibit 3 to the Petition confirms that service is available from Griggs or wireless providers, such as T-Mobile. *Id.* Customers are warned that they may be disconnected if they have not replaced CenturyLink voice service before October 26, 2025.

On September 25, 2025, the Commission held a hearing on the Petition of Red River Communications concerning its overbuild and substantial replacement of the Wahpeton, N.D. exchange. During that informal hearing, several photographs were shared depicting CenturyLink’s deteriorating outside plant. One photograph showed a still-powered collection of loop plant lying on its side in a field of weeds with an open or broken case easily accessible to children. Another photograph depicted a broken or open pedestal on a Wahpeton street corner, still powered and exposed to children.

Upon information and belief, CenturyLink has only a handful of technicians available to maintain its voice telephone service statewide. Considering the Company’s well-known Rural Digital Opportunity Fund defaults in other states, it appears that management challenges may be affecting the public in North Dakota.

Griggs therefore objects to CenturyLink’s Petition. Moreover, Griggs submits that a Commission inquiry is warranted to examine whether CenturyLink remains qualified as a holder of its CPCN, at least in the rural exchanges where it has been largely replaced by neighboring local exchange carriers. *See, e.g.*, § 49-03.1-07 (conditioning renewal of certificates where plant operations not suspended).

Respectfully submitted,



Benjamin H. Dickens, Jr.
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Counsel for Griggs County Telephone
Company

cc: Jason D. Topp, Esq.