



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

October 10, 2025

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

**Re: Qwest Corporation Designated Eligible Carrier- -
Partial Relinquish Application -PU25-233**

Dear Mr. Kahl:

Enclosed please find Qwest Corporation dba CenturyLink comments in support of its Partial Relinquish Application.

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//db

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Qwest Corporation
Designated Eligible Carrier – Partial Relinquish-
Application

Case No. PU-25-233

COMMENTS OF QWEST CORPORATION DBA CENTURYLINK QC
IN SUPPORT OF ITS APPLICATION

On August 1, 2025 Qwest Corporation dba CenturyLink QC, (CenturyLink) filed a request for relinquishment of ETC status in the Leonard Exchange. Section 214(e)(4) of the Communications Act 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.

On August 7, 2025, the Commission issued a notice of opportunity for comment which invited comments on the proceeding until October 10, 2025.

The Objection of Griggs Telephone Company has no relevance to the issues in this docket.

On October 3, 2025 Griggs County Telephone Company (Griggs) filed a letter that makes a number of wide-ranging allegations but ultimately (1) objects to the petition and (2) states “ 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.”

While CenturyLink vehemently disagrees with some of the facts alleged by Griggs, none of them address the standard set forth in 47 U.S.C. §214(e)(4) Griggs does not dispute that there is more than one eligible telecommunications carrier serving the Leonard exchange. Griggs does not dispute the notice that has been given to the state Commission. Griggs does not dispute the notice that has been provided to customers. In such circumstances, Section 214(e)(4) states that “a state Commission ...shall permit an eligible telecommunications carrier to relinquish its designation as an eligible telecommunications carrier.”

CenturyLink has repeatedly contacted customers by mail, phone and in person.

CenturyLink has been actively contacting customers since it filed this docket. Attached as Exhibits 1, 2 and 3 are the written notices that have been sent. In addition, CenturyLink has called all affected customers at least five times. CenturyLink has also sent representatives to the Leonard exchange to meet face-to-face with remaining customers to make sure they are aware of this planned disconnection and aware of the alternatives that are available to them.

As of this date, six customers have already disconnected their service, and several others are in the process of changing to other providers so they can disconnect. Every remaining customer is aware of this pending disconnection. Some have chosen to wait until disconnection occurs rather than port their numbers to an alternative service. If this Commission grants this petition and provides a clear date on which disconnection may move forward, CenturyLink will provide a final written notice ensuring such customers know the date service will cease. No customer harm will occur if the Commission grants this petition.

Grigg’s Request for a Commission Investigation is irrelevant to this docket.

Grigg’s request for an investigation is beyond the limited scope of this docket. It is unclear what Griggs is requesting – its scope, its fact allegations, the impact on customers and likely other considerations. If Griggs wishes to pursue such a request it should file its request with the Commission and precisely define what it is seeking and the evidence it has in support of the request.

Conclusion

Because no commenter has disputed any part of the test set forth in 47 USC §214(e)(4), the Commission should grant CenturyLink's request for relief from ETC obligations in the Leonard exchange.

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: October 10, 2025

EXHIBIT 1



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.

EXHIBIT 2

<Date>

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

A new solution for your retiring CenturyLink phone service

<First Name>,

The technology we use to provide your CenturyLink voice service is outdated and will soon be retired. We understand how important reliable communication is to you, so we have a solution to help prevent service interruptions.

CenturyLink® Connected Voice with Air-Line™ delivers the reliability of a home phone backed by the power of today's tech—no internet connection needed. You can keep your existing phone number, and you won't be charged for this phone service for at least six months from the date your order is completed.

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. We'll send new phone equipment to you at no cost. This equipment usually arrives within three to four business days and will include the easy set-up instructions.

When you receive the equipment, plug the new equipment into a power outlet and into your phone. You can start making calls right away and receiving calls approximately 5 days later.

- Please note this equipment requires electrical power.
- We will provide you with a battery backup, but the phone service will not be able to place or receive any calls, including 911 calls, without sufficient power.
- The complete setup instructions are online at centurylink.com/airline-help. They'll also be included with the equipment.

Please note: We'll need your consent before we charge you for this new phone service.

- We will notify you at least 90 days before we begin charging you.
- At that time, you can let us know if you'd like to keep your new service.
- If we don't hear from you, we'll cancel your new service.

Learn more and find answers to frequently asked questions at centurylink.com/airline-help.

Your CenturyLink Team

EXHIBIT 3

<Date>

Customer Name
Address
City, St ZIP

Reminder! We have a solution for your retiring CenturyLink phone service

<First Name>,

Just a reminder that the technology we use to provide your CenturyLink voice service is outdated and will soon be retired. We understand how important reliable communication is to you, so we have a solution to help prevent service interruptions.

CenturyLink® Connected Voice with Air-Line™ delivers the reliability of a home phone backed by the power of today's tech—no internet connection needed. **You can keep your existing phone number, and you won't be charged for this phone service for at least six months from the date your order is completed.**

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**. We'll send new phone equipment to you at no cost. This equipment usually arrives within three to four business days and will include the easy set-up instructions.

When you receive the equipment, plug the new equipment into a power outlet and into your phone. You can start making calls right away and receiving calls approximately 5 days later.

- Please note this equipment requires electrical power.
- We will provide you with a battery backup, but the phone service will not be able to place or receive any calls, including 911 calls, without sufficient power.
- The complete setup instructions are online at centurylink.com/airline-help. They'll also be included with the equipment.

Please note: We'll need your consent before we charge you for this new phone service.

- We will notify you at least 90 days before we begin charging you.
- At that time, you can let us know if you'd like to keep your new service.
- If we don't hear from you, we'll cancel your new service.

Learn more and find answers to frequently asked questions at centurylink.com/airline-help.

Your CenturyLink Team