

**STATE OF NORTH DAKOTA
BEFORE THE 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. PU 25-233

Request To Intervene and Request For Formal Hearing

Griggs County Telephone Company ("Griggs"), by and through its undersigned counsel, hereby requests to intervene pursuant to N.D.A.C. § 69-02-02-05 in the above-captioned proceeding initiated by Qwest Corporation d/b/a CenturyLink QC's ("CenturyLink") Petition for Partial Relinquishment of ETC Designation in the Leonard exchange ("Petition"), and requests the Commission hold a hearing on the same. In support thereof, Griggs states as follows:

1. N.D. Admin. Code § 69-02-02-05 requires that a petition to intervene be in writing and set forth the grounds for intervention, the position and interest of the petitioner in the proceeding, what the petitioner would contribute to the hearing, and whether the petitioner's position is in support of or in opposition to the relief sought.

2. Griggs has standing to intervene in this matter because it was recently designated as the incumbent local exchange carrier ("ILEC") and eligible telecommunications carrier ("ETC") in the Leonard and Kindred exchanges of North Dakota.¹ These designations form the basis for CenturyLink's Petition for Partial Relinquishment, and Griggs will be substantially affected by the Commission's determination in this proceeding.

¹ See Order, Case Nos. PU-24-386; PU-24-387 (N.D. Pub. Serv. Comm'n Mar. 26, 2025).

3. Griggs may present evidence through direct testimony and cross-examination on issues arising in this proceeding, including but not limited to CenturyLink's nearly complete customer migration resulting from lack of technology upgrades, inadequate maintenance of telephone plant and related safety hazards, customer service deficiencies, management issues evidenced by federal program defaults, and apparent policies to neglect rural operations, as outlined in its objection filed September 30, 2025.

4. Griggs opposes the relief sought, as detailed in its objection of September 30, 2025.

5. Griggs requests a hearing before the full Commission pursuant to N.D.A.C. § 69-02-04-09. Good cause exists to grant a hearing because factual issues relating to CenturyLink's status as an eligible telecommunications carrier and holder of a Certificate of Public Convenience and Necessity ("CPCN"), which underlie the Commission's prior Order dated March 26, 2025, are now before the Commission as a result of the recently filed Petition.

6. As the Order recounts, Griggs now occupies a market position "comparable to a legacy incumbent LEC" and has "substantially replaced the Legacy incumbent LEC."² In addition to the factual findings regarding replacement, the Order found that Griggs was qualified under federal law for designation as an ETC in the Leonard and Kindred exchanges and to receive federal universal service funding in Griggs' expanded service area.³ The Order found it to be in the public interest to include these two exchanges within Griggs' rural study area for purposes of universal service support and therefore to be removed from CenturyLink's study area.⁴ The Order then granted Griggs' applications for CPCNs for the two exchanges and ordered that these same exchanges be relinquished from CenturyLink's study area.⁵

² Order, Case Nos. PU-24-386; PU-24-387, at 3 (N.D. Pub. Serv. Comm'n Mar. 26, 2025).

³ Id. at 4-5.

⁴ Id.

⁵ Id. at 5.

7. CenturyLink's Petition now seeks partial relinquishment of its ETC designation in the Leonard Exchange. Though it is not clear from the Petition which exactly what CenturyLink intends to maintain in a partial context, Griggs notes CenturyLink's statement that it "is not seeking to modify its Certificate of Public Convenience and Necessity."⁶ Specifically, CenturyLink states it "prefers to maintain its ability to serve the area in the future." Id.

8. Griggs submits that CenturyLink's basic qualifications as a carrier are at issue in this proceeding based on the following:

a. According to CenturyLink's own Petition, it serves only seventeen customers in the Leonard exchange, all voice customers with no broadband customers.⁷ This nearly complete customer migration occurred due to CenturyLink's failure to upgrade technology. Upon information and belief, CenturyLink has only a handful of technicians available to maintain its voice telephone service statewide.

b. On September 25, 2025, the Commission held an informal hearing on the Petition of Red River Communications concerning its overbuild and substantial replacement of the Wahpeton exchange. During that hearing, photographs were presented 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.

c. Considering CenturyLink's well-known Rural Digital Opportunity Fund defaults in other states, it appears that management challenges may be affecting the public in North Dakota. These factors, combined with very large numbers of customer complaints with

⁶ Petition at 2.

⁷ Petition at 4.

unreasonable repair response times, raise questions about CenturyLink's commitment to rural operations.

d. CenturyLink's request for "partial relinquishment" of its ETC designation while maintaining its CPCN lacks clarity and should be further examined by the Commission.

For the foregoing reasons, Griggs respectfully requests that the Commission grant its requests for intervention, allowing it to participate with full rights in the above-captioned proceeding, and schedule a hearing on CenturyLink's Petition.

Respectfully Submitted

Griggs County Telephone Company

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

Blooston, Mordkofsky, Dickens
& Prendergast, LLP
2120 L Street, N.W., STE 825
Washington, D.C., 20037
(202) 659-0830
bhd@bloostonlaw.com
sta@bloostonlaw.com

Its Attorneys

Dated: October 10, 2025

Certificate of Service

I hereby certify that on October 10, 2025, I caused a copy of the foregoing **Request to Intervene and Request for Hearing** to be served on the following parties through their counsel of record by electronic mail:

Jason D. Topp
Jason.Topp@lumen.com
Counsel for
Qwest Corporation d/b/a CenturyLink QC

Executed this 10th day of October, 2025

Salvatore Taillefer, Jr.