



October 10, 2025

VIA ELECTRONIC MAIL

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

RE: Comments of Dakota Central Telecommunications Cooperative in Support of Objection to Petition for Partial Relinquishment of ETC Designation by Qwest Corporation, PU-25-233

Dear Mr. Schock:

Dakota Central Telecommunications Cooperative ("Dakota Central") hereby submits these comments in support of the Objection filed by Griggs County Telephone Company ("Griggs") to the Petition for Partial Relinquishment of Eligible Telecommunications Carrier ("ETC") Designation filed by Qwest Corporation d/b/a CenturyLink ("CenturyLink") in Case No. PU-25-233. Dakota Central has direct operational experience with CenturyLink's deteriorating service quality and network maintenance practices and respectfully urges the Commission to deny CenturyLink's Petition or, in the alternative, initiate a broader investigation into CenturyLink's qualifications to hold its Certificate of Public Convenience and Necessity ("CPCN") in rural North Dakota exchanges.

Dakota Central has provided telecommunications services in North Dakota since 1951 and currently serves as the incumbent local exchange carrier in twelve exchanges. Beginning in 2002, Dakota Central began offering competitive services in CenturyLink's Jamestown exchange (prefix 252), constructing a fiber-to-the-home network covering approximately eighty-five percent of the exchange. Dakota Central now serves 5,505 broadband subscribers and 2,237 voice subscribers, with fiber drops available to 7,169 total locations and active service to 5,642 locations. Dakota Central advertises 1 Gbps service with capacity to provide 10 Gbps service. In contrast, according to publicly available data such as the National Broadband Map, CenturyLink offers speeds of 10/1 Mbps or less in some locations, with many locations showing speeds as low as 0.2/0.2 Mbps.

Dakota Central's experience reveals a pattern of network neglect by CenturyLink. CenturyLink's infrastructure in the Jamestown exchange consists predominantly of copper plant, with fiber mainline facilities that CenturyLink has not utilized to provide customer services. Dakota Central observed that CenturyLink used Connect America Fund Phase II ("CAF II") funding to connect node sites without deploying broadband service to actual customer locations.

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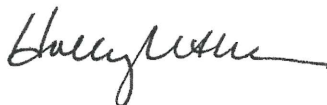
Dakota Central has consistently observed that CenturyLink does not respond to customer requests for service in the exchange, leaving residents underserved despite CenturyLink's receipt of federal universal service support.

The Commission has recently addressed similar issues involving CenturyLink. On March 26, 2025, the Commission issued an Order in Case Nos. PU-24-386 and PU-24-387 finding that the Leonard and Kindred exchanges "are hereby relinquished" from CenturyLink's study area. Additionally, during the September 25, 2025 informal hearing on Red River Communications' petition concerning the Wahpeton exchange, photographs were presented depicting CenturyLink's deteriorating outside plant infrastructure, including still-powered equipment "lying on its side in a field of weeds with an open or broken case easily accessible to children." Objection at 2. These safety hazards present imminent dangers to the public.

CenturyLink's well-documented Rural Digital Opportunity Fund defaults in other states raise concerns about management challenges affecting North Dakota. The combination of deteriorating infrastructure and federal program defaults raises serious questions about CenturyLink's technical, financial, and managerial capabilities to continue serving as a certificated carrier.

Dakota Central respectfully requests that the Commission deny CenturyLink's Petition or require CenturyLink to demonstrate adequate resources and plans to maintain its infrastructure safely. Dakota Central joins Griggs in requesting that the Commission initiate a broader investigation into whether CenturyLink remains qualified as a CPCN holder in rural exchanges, examining CenturyLink's use of federal universal service support funds and its technical, financial, and managerial qualifications.

Respectfully submitted,



Holly Utke

Chief Executive Officer