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

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

Dear Mr. Schock:

Polar Communications Mutual Aid Corp. d/b/a Polar Communications ("Polar") submits this letter supporting 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 QC ("CenturyLink"). Polar's operational experience in the North Dakota – especially in the Northwood exchange – provides additional evidence supporting Griggs' concerns about CenturyLink's fitness to hold its Certificate of Public Convenience and Necessity ("CPCN") in rural North Dakota exchanges.

Polar is a North Dakota-based cooperative located in Park River that has served rural communities as an incumbent local exchange carrier ("ILEC") in twenty-nine exchanges across the state since 1952. This nearly 75-year history has given Polar extensive knowledge of telecommunications service conditions throughout North Dakota, including direct operational experience in exchanges where CenturyLink serves as the incumbent.

I. The Concerns Raised by Griggs Merit Serious Attention

Griggs identifies several troubling aspects of CenturyLink's Petition that deserve Commission scrutiny. CenturyLink acknowledges serving only 17 voice customers and no broadband customers in Leonard—a remarkable admission indicating near-complete replacement by a competitor. Such wholesale customer migration does not occur absent serious service deficiencies. Customers rarely switch providers without compelling reasons related to quality, reliability, or capability.

CenturyLink's request to shed ETC obligations while preserving its CPCN for potential future opportunities presents a problematic approach to telecommunications regulation. Certificates exist to ensure public service, not to preserve option value for carriers unwilling to fulfill service obligations. Allowing this selective compliance would undermine the regulatory framework designed to guarantee adequate telecommunications access for all North Dakotans.

The safety issues Griggs raises are particularly concerning. Photographs from the September 25, 2025 Red River Communications hearing showed powered equipment lying exposed in fields with broken cases and damaged pedestals on street corners—hazards accessible to children. Such conditions reflect fundamental failures in basic infrastructure maintenance and public safety responsibility, not merely service quality issues.

II. CenturyLink's Service Failures in Northwood Mirror Leonard

Polar's experience in those CenturyLink exchanges Polar serves reinforces Griggs' concerns. In particular, CenturyLink serves as incumbent ILEC in Northwood, where Polar has completely overbuilt CenturyLink's network, which consists predominantly of copper facilities with minimal fiber connectivity limited to select business locations.

According to the National Broadband Map, CenturyLink primarily offers 10/1 Mbps speeds in Northwood—the same inadequate service level identified in Leonard. The FCC stopped recognizing 10/1 Mbps as "broadband" in 2015. CenturyLink's continued reliance on this antiquated standard a full decade later demonstrates complete failure to invest in modern infrastructure.

Responding to the incumbent's service inadequacies, Polar deployed fiber-to-the-home infrastructure providing 100% coverage throughout Northwood—a complete overbuild of CenturyLink's copper network. In addition, Polar has built out a large portion of rural areas of CenturyLink serves in eastern North Dakota. At the end of August, Polar served 1,925 locations in those areas (approximately 60%).

Polar's fiber network delivers symmetrical speeds up to 1 Gbps, representing appropriate modern broadband capability.

Customer response has been substantial. Polar currently serves approximately 85 voice subscribers (roughly 65% of total voice subscribership) and 518 broadband subscribers (approximately 71% of total broadband subscribership) in Northwood. When given a choice between CenturyLink's aging copper and Polar's modern fiber infrastructure, customers overwhelmingly choose superior service.

This migration pattern parallels what Griggs describes in Leonard. The consistency across multiple exchanges strongly indicates that CenturyLink's service problems are systemic rather than isolated incidents.

III. Infrastructure Investment Versus Network Abandonment

The contrast between Polar's investment and CenturyLink's apparent withdrawal is striking. Polar invested substantially to deploy 100% fiber coverage in Northwood, and substantial (but not complete) coverage in the eastern parts of the state, despite being the competitive rather than incumbent carrier. This reflects Polar's commitment to ensuring rural North Dakotans have access to modern telecommunications infrastructure.

CenturyLink continues offering 10/1 Mbps service over aging copper in exchanges where it is the incumbent with primary service obligations. This represents not maintenance of existing

service but a decade of declining relative quality as modern broadband standards have evolved far beyond what CenturyLink's infrastructure can deliver.

Polar's experience suggests CenturyLink is managing a deliberate withdrawal from rural North Dakota while attempting to retain valuable certificate rights—avoiding infrastructure costs while preserving legal status that may have future value.

Griggs notes that CenturyLink reportedly has only a handful of technicians maintaining voice telephone service statewide. If accurate, this staffing is grossly inadequate for proper network maintenance across multiple exchanges. Effective telecommunications requires more than responding to outages—proper maintenance includes preventive inspections, proactive repairs, infrastructure upgrades, vegetation management, and systematic performance monitoring. These functions cannot be performed with minimal staff spread across an entire state.

Polar maintains technicians stationed throughout its service territory, with each assigned to a specific area plus additional staff for overflow. All customer calls during business hours are answered by live representatives rather than automated systems. This staffing reflects Polar's understanding that quality telecommunications service requires adequate human resources. The contrast with CenturyLink's apparently minimal technical staff further illustrates the difference between a carrier committed to service and one that has withdrawn from active operations while retaining certificate status.

IV. Public Interest

Section 49-03.1-07 of the North Dakota Century Code provides authority for Commission action where certificated carriers have failed to maintain operations. Certificates are not permanent entitlements but conditional authorizations that may be revoked or modified when carriers fail to fulfill obligations.

A carrier that has substantially ceased providing service, failed to maintain infrastructure, generated overwhelming complaints, and been replaced by competitors has practically abandoned its service obligations. The Commission has both authority and responsibility to examine whether such carriers should continue holding certificate rights intended to ensure public service.

The public interest requires safe, reliable, modern telecommunications infrastructure. Rural Digital Opportunity Fund defaults in other states raise questions about CenturyLink's management capacity and commitment to rural service. A carrier that defaults on federal broadband deployment obligations demonstrates challenges in planning, executing, and maintaining telecommunications infrastructure projects.

The public interest is not served by permitting carriers to retain valuable certificates while systematically failing to fulfill service obligations. When capable carriers have made substantial investments to deploy modern infrastructure and serve customers the incumbent has abandoned, those investing carriers—not the failing incumbent—should be recognized as providers best positioned to serve the public interest.

Conclusion

Polar supports Griggs' objection and endorses the request that the Commission initiate an inquiry examining whether CenturyLink remains qualified to hold its CPCN in rural exchanges where it has been substantially replaced by neighboring carriers. Evidence from Leonard combined with Polar's experience and the broader complaint record suggests CenturyLink's operational problems are systemic.

The Commission should not allow carriers to selectively comply with telecommunications obligations—shedding universal service requirements while retaining certificates that may have future value. North Dakota's rural communities deserve carriers committed to deploying and maintaining modern infrastructure and providing quality service. Where evidence demonstrates certificated carriers have abandoned these commitments while competing carriers have stepped forward to make necessary investments, the Commission should act to ensure legal status aligns with operational reality.

Respectfully submitted,



Karl Blake

CEO

Polar Communications