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Dear Mr. Seuffert and the Members of the Public Utilities Commission,

On behalf of CWA, I am responding to your letter dated May 18, 2020, requesting information leading up to the Complaint we filed regarding CenturyLink on April 22, 2020, and our subsequent letter withdrawing that Complaint.  We reached out to the Company about providing a joint response to your request but could not come to agreement on its contents.

CWA’s complaint primarily stemmed from the Company’s plan to eliminate a large proportion of the Technician staff who maintain the telephone and internet network in Minnesota.  Given the Company’s frequent struggles to meet service requirements as reported by CWA members in the field and visible concerns regarding maintenance of infrastructure (see photos accompanying initial complaint), it seems inconceivable that service standards could be met with such a reduction in Technicians.

The COVID-19 crisis exacerbated our concerns as Minnesotans must rely even more heavily on CenturyLink’s network for work, school, commerce, and health care, etc.  While there should never be a time for CenturyLink to experiment with reduced staffing levels or risk the reliability of the network, *this*most certainly, is not it.

After our complaint was filed with the PUC, CenturyLink agreed to withdraw the majority of the force reductions.  This alleviated a great deal of our concern and we believed it was a recognition by the Company that it was an error to proceed with the planned force reductions (initially announced in February)--at least at the height of a pandemic.  We remain concerned however, about CenturyLink’s long-term plans in Minnesota (and elsewhere).

The issues we raised with the Company regarding a potential joint response to the PUC’s request were, 1) The Company’s planned investment in infrastructure, and  2) Retention of a sufficient workforce.  At this point, the Company could not commit to us that it planned to invest any more in infrastructure in Minnesota than it was already planning, which we regard as insufficient to maintain, let alone upgrade the physical plant.  Secondly, the Company would not commit to retaining the Technician positions needed to do that work for any period of time.  In fact, it should be noted, many of the planned layoffs were avoided only by “encouraging” Technicians to accept seasonal part-time positions.  By doing so, the Company immediately reduced the total hours Technicians are on the job in Minnesota, but it also indicates a further decline in Technician-hours has merely been delayed until the end of construction season.

While these remain serious concerns, we are cautiously optimistic that CenturyLink now  recognizes its error in seeking reductions in staff when the work to be done requires more not less staff.  We also are

giving the Company the benefit of the doubt that it intends to increase investment in infrastructure and to maintain sufficient staffing levels despite its unwillingness to make those commitments in a joint letter to the PUC.

CenturyLink Technicians, members of CWA, will no doubt continue to observe the practical implications of CenturyLink’s Corporate decisions—positive or negative.  We will know soon enough if our faith in the Company’s good intentions are warranted, or if the cancellation of the force adjustment was merely a temporary and cynical ploy to avoid further scrutiny.

I would like to thank the PUC for the work that you do every day to ensure the companies that provide communications services to Minnesotans do so fairly and fully and are accountable for the reliability of those services.

Thank you.

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Jeff S. Lacher

CWA Staff Rep.