

Decision No. C24-0917-I

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

PROCEEDING NO. 24AL-0438T

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IN THE MATTER OF ADVICE LETTER NO. 3171 FILED BY QWEST CORPORATION DBA CENTURYLINK QC COLORADO P.U.C. NO. 25 TO PROVIDE LAST MILE DIVERSITY IN CONJUNCTION WITH IMPLEMENTING THE NETWORK IMPROVEMENT PLAN APPROVED IN PROCEEDING NO. 23A-0197T, TO BECOME EFFECTIVE MARCH 1, 2025.

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**INTERIM COMMISSION DECISION DIRECTING THE  
FILING OF AN ADDITIONAL AMENDED ADVICE  
LETTER AND TO PROVIDE CUSTOMER NOTICE**

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Issued Date: December 12, 2024

Adopted Date: December 11, 2024

**I. BY THE COMMISSION**

**A. Statement**

1. By this Interim Decision, the Commission directs Qwest Corporation, doing business as, CenturyLink QC (“CenturyLink”), to file a fourth amended Advice Letter No. 3171 with an effective date of December 31, 2024. This Interim Decision also directs CenturyLink to provide written notice to all current Basic Emergency Service customers of the filing, including the increase in the tariffed rate, the effective date of the tariff, the effective date of the increase in the monthly recurring charges, and instructions regarding how to file comments, objections, or protest letters in the Proceeding.

**B. History**

2. On October 8, 2024, Qwest Corporation, doing business as, CenturyLink QC (“CenturyLink”), filed Advice Letter No. 3171 and associated tariff pages to amend Tariff No. 25,

governing the provision of Basic Emergency Service (9-1-1 call delivery) to 9-1-1 governing bodies and Public Safety Answering Points (“PSAP”) in the State of Colorado.

3. The proposed amendments to Tariff No. 25 proposed to increase the monthly recurring charges to the entities that purchase Basic Emergency Service by \$24.25 per concurrent session per month, and that the amendments to the tariff and the price increase would both become effective on March 1, 2025. The purpose of the price increase, per the Advice Letter, is to fully implement the last mile diversity project approved by the Commission in Decision No. C24-0688.<sup>1</sup>

4. On December 4, 2024, CenturyLink filed a revised Advice Letter No. 3171, changing the effective date of the amended tariff pages to December 20, 2024. Despite the change in the effective date of the tariff pages, the effective date of the increased monthly recurring charges was proposed to remain March 1, 2025. The amended Advice Letter states that “the company requires certainty as to whether the charge will be approved and files this amended advice letter so that it can move forward with certainty to plan for construction of the diverse last mile facilities, as well as establishing monthly recurring service contracts with third party providers for those diverse last mile connections.”

5. Also on December 4, 2024, CenturyLink filed a second revised Advice Letter No. 3171, correcting the “issued” date in the amended proposed tariff pages.

6. Also on December 4, 2024, CenturyLink filed a third revised Advice Letter No. 3171, to state that it was the “3<sup>rd</sup> Amended Advice Letter,” whereas the Second Amended Advice Letter was only labeled as “Amended Advice Letter” and not “2<sup>nd</sup> Amended Advice Letter.”

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<sup>1</sup> See Proceeding No. 23A-0197T.

7. By modifying the effective date of the proposed tariff amendments to an earlier date, December 20, 2024, than the date that the rate changes take effect, March 1, 2025, CenturyLink is effectively reducing the period in which parties may file a protest. The Commission does not object to this change, provided that customers of the service, being the local 9-1-1 governing bodies and Public Safety Answering Points, are aware of the shortened period to file a protest.

8. Commission staff has confirmed that no customer notice was sent by CenturyLink of this change, although a portion of the customers learned of the changes through the Commission's 9-1-1 Advisory Task Force.

**C. Findings and Conclusion**

9. § 40-3-104(1)(c)(V)(B), C.R.S., authorizes the Commission to impose additional notice requirements if it determines that such additional notice is in the public interest. CenturyLink's advice letter filings present unique timing considerations, and the Commission therefore finds that it is in the public interest to require CenturyLink to provide notice, consistent with the discussion below, to ensure that all customers are aware of the shortened period in which protests to the proposed advice letter may be filed.

10. The Commission directs CenturyLink to (1) file an amendment to the Advice Letter setting an effective date of December 31, 2024, and (2) to provide written notice to all Basic Emergency Service customers by December 13, 2024, of the change. This notice shall also include instructions for how a customer may file a Protest Letter or comments in the proceeding.

**II. ORDER**

**A. The Commission Orders That:**

1. Qwest Corporation, doing business as, CenturyLink QC (“CenturyLink”) is ordered to file a Fourth Amended Advice Letter No. 3171 with a proposed effective date of December 31, 2024.

2. CenturyLink is further ordered to provide written notice to all Basic Emergency Service customers of the new Advice Letter with its new proposed effective date, consistent with the discussion above. Such notice shall include instructions for how customers may file Protest Letters in the proceeding. CenturyLink shall file proof of notice with the Fourth Amended Advice Letter No. 3171 discussed above.

3. This Decision is effective immediately upon its Issued Date.

**B. ADOPTED IN COMMISSIONERS’ WEEKLY MEETING  
December 4, 2024.**

(S E A L)



ATTEST: A TRUE COPY

THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

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MEGAN M. GILMAN

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Commissioners

Rebecca E. White,  
Director