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March 16, 2011

VIA ELECTRONIC FILING

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Re: Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a/ CenturyLink for Consent to Transfer of Control, WC Docket No. 10-110

Dear Ms. Dortch:

CenturyLink and Qwest (the "Applicants") write to update the voluntary commitments that they previously filed in the above-captioned proceeding. The attached voluntary commitments replace those that were filed on March 9, 2011. As with the earlier commitments, the Applicants reserve the right to withdraw these commitments upon written notice to the Commission if the Commission has not approved the merger at the time of the written notice.

Please contact us if you have any questions.

Very truly yours,

/s/

Karen Brinkmann Alexander Maltas LATHAM & WATKINS LLP

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<u>ATTACHMENT A – MERGER COMMITMENTS</u>

Unless otherwise expressly specified herein, all commitments described in this letter are effective as of the Merger Closing Date, which is defined as the date on which the Applicants consummate the proposed transaction described in the Applications. The commitments described herein will be null and void if the Applicants fail to consummate the proposed transaction and there is no Merger Closing Date. Unless otherwise expressly specified here, these commitments will expire three years following the Merger Closing Date.

I. INCREASING AVAILABILITY OF BROADBAND SERVICE

The Applicants commit to implement a significant deployment plan that will upgrade facilities and expand broadband availability in legacy Qwest territory. The plan will entail substantial investments during the seven years following the close of the transaction to achieve the following minimum levels of broadband availability:

FCC BROADBAND BUILD-OUT METRICS	Current % LUs	% LUs 3 Years from Merger Closing Date	% LUs 5 Years from Merger Closing Date	% LUs 7 Years From Merger Closing Date
Living Units ¹ with Access to at Least 1.5 Mbps Downstream from the Applicants ²	87.0%	88.5%	90.0%	92.7%
Living Units with Access to at Least 5 Mbps Downstream from the Applicants ³	53.0%	62.0%	68.0%	78.8%

A "Living Unit" is defined as a distinct address in Qwest's network inventory where Qwest currently has, had in the past, or had planned to provide service to a customer. This includes, but is not limited to, single family homes, multi-dwelling units (*e.g.*, apartment buildings and condominiums), and business locations. These figures are percentages of the total Living Units in Qwest territory, which was 16,463,946 as of October 1, 2010.

Unless otherwise specified, speeds shown are speeds based on train rate. The train rate, or sync rate, is the line or link data rate established between the DSLAM and the modem to provide stable customer service. Actual throughput speed will be less than train rate, based on a variety of factors such as distance between computer and speed test server (*i.e.*, DNVR to DNVR versus DNVR to MPLS), individual computer performance, wireless vs. hardwire connection to modem, operating system, TCP window size (amount of data a computer can receive), software applications running in background, spyware / anti-virus software, etc.

Notwithstanding the speed definition in footnote 2, the Applicants commit that, at the level identified as at least 5 Mbps downstream, actual throughput speeds will be at least 4 Mbps downstream. In

Living Units with Access to at Least 12 Mbps Downstream from the Applicants	28.8%	35.0%	42.0%	60.0%
Living Units with Access to at Least 40 Mbps Downstream from the Applicants	8.3%	15.0%	20.0%	30.0%

Among other benefits of this investment, 4 million living units, including at least 20,000 community anchor institutions,⁴ in Qwest territory will gain access to broadband service at speeds of 5 Mbps or higher downstream. Today, these 4 million living units either have no Qwest broadband service, or can qualify only for maximum downstream speeds lower than 5 Mbps. Of the living units upgraded to at least 5 Mbps, at least 75% also will have at least 1 Mbps upstream (actual throughput) at the end of the build-out period. In addition, as a result of this investment, broadband service at speeds of 12 Mbps or more downstream – the speeds most often requested by small business customers – will be made available to more than twice as many Qwest customers as have access to such speeds today.

This investment plan focuses on legacy Qwest territory. It will have no effect on existing investment efforts and commitments to expand and upgrade facilities in legacy CenturyLink territory. This investment plan reaffirms CenturyLink's intention to be a leading provider of broadband services in the United States.

Beginning on March 1, 2012, for data as of December 31, 2011, and every six months thereafter (*i.e.*, September 1 for data as of the end of June, and March 1 for data as of the end of December), CenturyLink will report to the Wireline Competition Bureau the percentage of living units within the Qwest territory to which CenturyLink offers broadband services capable of delivering at least 1.5 Mbps, 5 Mbps, 12 Mbps and 40 Mbps downstream, and the breakdown at each level between rural and non-rural areas. This reporting obligation will not expire three years following the Merger Closing Date,

addition, of the living units upgraded to at least 5 Mbps, at least 75% will have actual upstream throughput of at least 1 Mbps. Actual throughput will be measured between the network interface unit (NIU) located at the end-user's premises and the service provider Internet gateway that is the shortest administrative distance from the NIU. *See* Federal Communications Commission, *Connecting America: The National Broadband Plan*, at 156 n.2 (2010).

- The Applicants use the definition of community anchor institutions previously employed by the Commission. *See Connect America Fund, et al.*, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, WC Docket No. 10-90, FCC 11-13 at ¶ 149 n.248 (rel. Feb. 9, 2011).
- ⁵ CenturyTel-Embarq Order, FCC 09-54, at 30, App. C.
- As used herein, a "rural" area is an area that is not located within a city, town, or incorporated area that has a population of greater than 20,000 inhabitants, consistent with the definition employed by the Rural Utilities Service of the U.S. Department of Agriculture in its implementation of the American Recovery and Reinvestment Act. *See*, *e.g.*, Department of Agriculture, Rural Utilities

but will continue until the earlier of: seven years following the Merger Closing Date or the achievement of all of the minimum broadband availability metrics set forth above.

II. ENCOURAGING ADOPTION OF BROADBAND SERVICE IN THE COMBINED TERRITORY

In order to promote adoption and use of broadband service, particularly within underserved communities, the Applicants commit to implement a broadband adoption program within the combined territory. The program has three goals: (a) reducing cost barriers for qualifying customers; (b) addressing the lack of computer equipment among qualifying customers; and (c) improving education, promotion and training as to the availability and uses of broadband.

As used herein, a "qualifying customer" is defined as a customer who: (i) is eligible for Lifeline telephone service in CenturyLink or Qwest ILEC service territory; (ii) is not a CenturyLink or Qwest broadband subscriber at the time of enrollment; and (iii) is not the subject of CenturyLink or Qwest collections activity. The Applicants believe that approximately 2.3 million households currently are eligible for Lifeline service throughout the combined CenturyLink and Qwest service territory.

CenturyLink's Adoption Program is comprised of the three components described below: the Service Discount described in Subsection A, the Equipment Discount described in Subsection B, and the Promotional Program described in Subsection C. Together with the reporting commitment described in Subsection E, and the retention of an independent researcher identified in Subsection F, the Applicants believe that this Adoption Program will produce substantial and measurable consumer benefits.

A. Service Discount: CenturyLink will offer discounted broadband Internet service for no more than \$9.95 a month during the first 12 months of service, and \$14.95 a month for the remainder of the service term, to all qualifying customers in the combined CenturyLink and Qwest territory. As a rule, the qualifying customer will gain access to 1.5 Mbps downstream capability, except in markets where 1.5 Mbps is unavailable, in which case the customer will gain access to 768 kbps broadband capability. Higher bandwidth services, where available, will be offered at a comparable discount:

	1.5 Mbps ⁷	5 Mbps	12 Mbps
Ongoing Discounted Monthly Rate	\$14.95	\$19.95	\$24.95

This discount plan will become available in all markets within six months following the Merger Closing Date and will remain open for five years following the availability of the

Service, Broadband Initiatives Program, RIN 0572-ZA01, 75 Fed. Reg. 25185, 25187 (May 7, 2010). All other areas are non-rural.

As stated above, 1.5 Mbps will be provided, except where it is unavailable, in which case 768 kbps will be provided.

adoption program in that market. At any time during that five-year period, a qualifying customer may enroll in this service plan once, and he or she may choose a term of as little as one year, which may be extended at the customer's option on a month-to-month basis for as long as five years. An "enrolled customer" is a qualifying customer who enrolls in a contract to purchase broadband service from CenturyLink for a term of at least one year and who remains a qualifying customer for the full term of his or her contract, including any extension on a month-to-month basis.

- B. Equipment Discount: CenturyLink will offer enrolled customers the ability to obtain one piece of computer equipment (such as a netbook) per household, pre-configured with operating software and Internet-ready, and with customary warranty from the manufacturer when available, for no more than \$150, provided that the customer agrees to a two-year broadband services contract at the discounted rate described above. A customer who obtains such equipment will have access to CenturyLink's 24/7 toll-free help line.
- C. Promotional Program: CenturyLink will implement a comprehensive customer education, broadband promotion, and customer training program targeting qualifying customers throughout the combined CenturyLink and Qwest territory.
 - 1. The company will coordinate with at least 200 local community groups, such as Boys & Girls Clubs and senior centers, as well as schools, libraries, and other state and local institutions, especially those that support qualifying customers, tribal partners, and non-profit institutions, to develop and distribute educational materials that describe the uses and benefits of broadband capability.
 - 2. CenturyLink will develop a meaningful promotional plan targeted to publicize the availability of discounted broadband services and equipment, as described in Subsections A and B above, to qualifying customers. CenturyLink will use at least 500 different media outlets (which may include radio and television stations, newspapers and magazines, on-line bulletin boards and web sites, libraries and social service agencies). CenturyLink will spend at least \$1 million per year promoting the Adoption Program throughout the combined territory in each of the first five years following the Merger Closing Date.
 - 3. CenturyLink will make available in-person training demonstrations at local anchor institutions, and develop and distribute materials such as DVDs with each computer, to assist consumers in basic computer skills, Internet browsing, and acquiring and using broadband services. CenturyLink will spend \$1 million on training over the first two years following the Merger Closing Date, and will

CenturyLink's Lifeline customers will continue to have access to the same CenturyLink services and products as other customers, on the same rates, terms, and conditions as other customers. CenturyLink will be attentive in matching services and products to their individual needs.

conduct 100 in-person training sessions and be responsive to requests for training at locations across the combined territory in the first two-year period.

- D. CenturyLink will begin rolling out this Adoption Program within six months following the Merger Closing Date.
- E. CenturyLink will report to the Wireline Competition Bureau on the Adoption Program's progress every six months after the start of the Adoption Program, for the next five years (*i.e.*, a total of ten reports). The Commission will reassess the need for additional reporting at the end of the five year period. The reports, as depicted in Attachment B, will describe in detail:
 - 1. the personnel head count with responsibility for the program in each market;
 - 2. the types of advertisements, demonstrations, training DVDs, and other tactics utilized as part of the education, promotion and training aspects of the program;
 - 3. the number of enrolled customers in the combined territory who purchased broadband under the discount plan in the preceding six months and cumulatively since the Merger Closing Date;
 - 4. the number of enrolled customers who discontinued broadband service during the preceding six months and cumulatively since the Merger Closing Date;
 - 5. the number of enrolled customers who purchased discounted computers in the preceding six months and cumulatively since the Merger Closing Date;
 - 6. the cumulative broadband adoption numbers in the combined territory at the time of each report, and compared to the adoption rate as of the Merger Closing Date;
 - 7. the respective cost to CenturyLink of the Equipment Discount and Promotional Program in the preceding six months and cumulatively since the Merger Closing Date.
 - 8. The number of attendees that participated in training at the 100 training locations referenced above.
- F. CenturyLink will evaluate the effectiveness of its Promotional Program, in consultation with the independent researcher discussed in paragraph II.G below, on an annual basis beginning one year after implementing the Program. CenturyLink will modify the Promotional Program as it deems appropriate to improve effectiveness, and will report to the Commission any modifications that it makes. At least once a year, the reports filed by CenturyLink pursuant to Section II.E will include a narrative description of the company's assessment of the overall success of the Adoption Program, including specific examples of aspects of the Program that have been most effective or least effective, or that might be modified in the future to be more effective, to stimulate broadband adoption in accordance with the goals of this Adoption Program and the Commission's National

- Broadband Plan. To the extent that such reports contain competitively sensitive information, such information may be submitted on a confidential basis.
- G. CenturyLink will engage with an independent researcher to help monitor and assess the impact of this Adoption Program. The results of the independent researcher's work will be made available to the FCC. To the extent that such work contains competitively sensitive information, such information may be submitted on a confidential basis.

III. PRESERVING COMPETITIVE RATES FOR CUSTOMERS IN OVERLAP BUILDINGS IN MINNESOTA AND WASHINGTON

The buildings listed in Attachment C are locations where both of the Applicants have local facilities, but for which the Applicants are unable to confirm from publicly available data whether or not there are at least two other, unaffiliated fiber-based carriers in the building. In order to ensure that existing customers in the buildings listed in Attachment C continue to obtain competitive rates for their services following the Merger Closing Date, CenturyLink commits to the following condition:

The rates as of the Merger Closing Date for any service provided by CenturyLink or Qwest will not be increased for either existing or new customers at any building listed in Attachment C for seven years following the Merger Closing Date, except that the foregoing condition shall become inoperative as to a particular building if: (i) one of the legacy CenturyLink or Qwest fiber facilities in that building is divested prior to the expiration of such seven year period; or (ii) the number of competing carriers with fiber facilities in the building returns to the level that existed prior to the Merger Closing Date; or (iii) the FCC engages in comprehensive changes to its special access rules requiring industry-wide changes to rates or rate structure for the services covered by this condition. For avoidance of doubt, nothing herein shall restrict CenturyLink from lowering rates to any customer at any time.

IV. COMMITMENTS REGARDING WHOLESALE OPERATIONS

- A. Operations Support Systems ("OSS") Replacement:
 - 1. In Qwest ILEC territory, following the Merger Closing Date, CenturyLink will not replace Qwest OSS or integrate it with any other OSS for at least 30 months following the Merger Closing Date, and thereafter will provide a level of wholesale service quality that is not less than that provided by Qwest prior to the Merger Closing Date, with functionally equivalent support, data, functionality, performance, electronic flow through, and electronic bonding.
 - 2. If CenturyLink plans to replace Qwest OSS or integrate it with any other OSS, then at least 180 days before replacement or integration of any of the Qwest OSS, CenturyLink will notify the FCC, affected states, and affected wholesale customers, file its proposed transition plan with the Commission and the affected states, and seek input from affected wholesale customers on such transition plan. CenturyLink will prepare a detailed OSS transition plan describing the OSS to be replaced or integrated, the surviving OSS, and why the change is being made. The plan also will identify planned contingency actions in the event that

CenturyLink encounters any significant problems with the planned transition. The plan submitted by CenturyLink will be prepared by information technology professionals with substantial experience and knowledge regarding legacy CenturyLink and legacy Qwest systems processes and requirements. CLECs will have the opportunity to comment on the Merged Company's plan in a forum in which it is filed, if the regulatory body allows comments, as well as in the Qwest Change Management Process.

- 3. The commitments made in this Section IV.A will not expire three years following the Merger Closing Date.
- B. In the Qwest ILEC territory, CenturyLink will maintain wholesale functionality, performance and e-bonding at a level that is at least comparable to what Qwest is providing prior to the transaction Merger Closing Date, subject to reasonable and normal allowances for the integration of CenturyLink and Qwest systems. For the metrics described below, CenturyLink will maintain a comparison of actual quarterly results to a benchmark value to be set at one standard deviation below the twelve-month average results achieved for the twelve full months prior to January 2011 (*i.e.*, from January through December 2010), assessed on a quarterly basis, separately for each state. CenturyLink will maintain service at a level that is no worse than the benchmark value, 90 percent of the time over four consecutive quarters beginning on the Merger Closing Date, excluding instances in which the base universe number of events being evaluated (*i.e.*, the denominator) is 20 or less.
 - 1. Pre-Ordering Average response time to pre-order queries calculated in seconds, which measures the number of seconds from CenturyLink's receipt of a query from a CLEC to the time CenturyLink returns the requested data to the CLEC; this would be reported for all areas transferred from Qwest in aggregate.
 - 2. Ordering The percentage of electronically submitted resale and UNE orders confirmed within the following timeframes:

	POTS/Pre-Qualified	Special Services	
	Complex		
Orders with < 10 Lines	24 hours	24 hours	
Orders with > 10 Lines	48 hours	48 hours	

- 4. Provisioning Missed appointment rates/appointments met, and the average of by how many days the appointment was missed, average delay days, broken out by Resale and UNE Loop POTS.
- 5. Provisioning Percentage of installation troubles reported within 30 days for UNE Specials, which measures the percent of lines/circuits/trunks installed where a trouble was reported and found in the network within 30 days of order

completion.

- 6. Provisioning Percentage of installation troubles reported within 30 days for Resale POTS and UNE Loop POTS, which measures the percent of lines/circuits/trunks installed where a trouble was reported and found in the network within 30 days of order completion.
- 7. Repair/Maintenance Network Trouble Report Rate, which measures the total number of network customer trouble reports received within a calendar month per 100 units/UNEs, separately for Resale and UNE Loop POTS.
- 8. Repair/Maintenance Mean Time to Repair, which measures the average duration from the receipt of the customer trouble report to the time the trouble is cleared, separately for Resale and UNE Loop POTS.
- 9. Repair/Maintenance Percentage of Repeat Reports within 30 Days for Resale POTS, UNE-Loop POTS and UNE Specials, which measures the percent of customer network trouble reports received within 30 calendar days of a previous customer network trouble report.
- 10. Carrier Service Center Average Speed of Answer, the average time it takes CenturyLink's local customer service center(s) to answer a repair or ordering call. This would be reported for all areas transferred from Qwest in aggregate.
- C. Following the Merger Closing Date, in the Qwest ILEC territory, the company will:
 - 1. Continue to provide the monthly reports of wholesale performance metrics that Qwest currently provides to CLECs and provide access to these metrics to state Commission or FCC staff;
 - 2. Comply with all wholesale performance reporting requirements and associated penalty regimes currently applicable to Qwest, including but not limited to those applicable under Performance Assurance Plans ("PAPs"); and
 - 3. Provide the performance reports that Qwest currently provides to existing wholesale customers to any new entrants in the Qwest ILEC territories.
- D. Orders will be processed in compliance with federal and state law, as well as the terms of applicable interconnection agreements.
- E. For 12 months following the Merger Closing Date, CenturyLink will not discontinue any Qwest interstate wholesale service offered to competitive carriers in the Qwest territory as of the Merger Closing Date, except as approved or ordered by the Commission.
- F. In legacy Qwest ILEC territory, interstate term and volume discount plans offered for tariffed services by Qwest as of the Merger Closing Date will be extended by 12 months

beyond the expiration of the then-existing term, or until May 1, 2013, whichever is later, unless the wholesale customer opts out of this extension. Term and volume discount plans that would otherwise expire between the date the FCC order is adopted and the Merger Closing Date will be extended through the Merger Closing Date at the wholesale customer's option, such that the additional 12 months provided under this provision will run from the Merger Closing Date.

- G. CenturyLink will honor all obligations under existing Qwest and CenturyLink interconnection agreements in effect as of the Merger Closing Date, and will extend any such interconnection agreements, unless the wholesale customer opts out of this extension, for 36 months following the Merger Closing Date, except that any interconnection agreement the term of which already was extended by operation of the *CenturyTel-Embarg Order* is exempt from this 36-month extension.
- H. CenturyLink will allow any wholesale customer with a pre-existing interconnection agreement to use that agreement as the basis for negotiating an initial successor interconnection agreement. Where parties agree it is reasonable to do so, the parties may incorporate the amendments to the existing agreement into the body of the agreement used as the basis for such negotiations of the initial successor interconnection agreement.
- I. CenturyLink will permit any requesting carrier under Section 251(b) desiring interconnection agreements with more than one CenturyLink ILEC operating within the same state to simultaneously negotiate interconnection agreements with all such CenturyLink ILECs operating in the same state. These unified negotiations will include negotiation of common terms, but CenturyLink reserves the right to negotiate individual terms unique to each operating company in the state.
- J. CenturyLink will not assert that any state lacks Section 252 jurisdiction over a Section 251(b) interconnection agreement or dispute on the grounds that such agreement or dispute also arises under these commitments and conditions.
- K. Following the Merger Closing Date, CenturyLink will not assert that any of its rural telephone companies are exempt from Section 251(c) obligations pursuant to Section 251(f)(1) of the Communications Act, as amended. This commitment will not expire three years following the Merger Closing Date.
- L. CenturyLink will not seek to recover through wholesale service rates one-time transfer, branding or other merger-specific costs.

V. COMMITMENTS TO ADVANCE FEDERAL UNIVERSAL SERVICE REFORM

The conditions in this section will not expire three years after the Merger Closing Date.

- A. CenturyLink Will Phase-Out Federal Local Switching Support ("LSS")
 - 1. LSS funding will be phased down in three equal steps over two years, beginning January 1, 2012. The baseline for reduction will be CenturyLink's actual 2010

calendar year support for LSS, based on the final calculations for 2010 that CenturyLink will file in December 2011. The support for the 2012 calendar year will be two-thirds of the baseline amount, and the support for the 2013 calendar year will be one-third of the baseline amount. Beginning calendar year 2014, CenturyLink will receive no federal LSS funding for 2014 or any subsequent calendar year, unless and until the FCC adopts a new final order governing LSS, upon which CenturyLink will be eligible to receive LSS funding on the same terms as the rest of the industry.

- B. CenturyLink Will Forgo Future Federal Safety Net Additive Payments
 - 1. The company will forgo safety net additive payments for calendar year 2012 and subsequent calendar years.
- C. CenturyLink Will Submit a Plan for Its Three Remaining Average Schedule Companies to Freeze Interstate Common Line Support ("ICLS") On a Per-Line Basis
 - CenturyLink commits to freeze ICLS on a per-line basis, effective January 1, 2012. CenturyLink will work with NECA and the Commission to determine if the operating companies at issue should remain average schedule companies. Upon such consultation, the Commission will determine within six months of the Merger Closing Date whether conversion to price caps is more appropriate, and if the Commission so determines, then CenturyLink commits to convert the average schedule companies to price caps by July 1, 2012 and then freeze ICLS consistent with Commission precedent.

VI. VIDEO COMPETITION REPORT

A. CenturyLink will file FCC Form 325 for the three reporting cycles following the Merger Closing Date for any market in which it has IPTV subscribers, provided that CenturyLink's agreement to this reporting obligation does not constitute an admission by the company that it is providing cable service or that it is a cable system operator. CenturyLink may submit competitively sensitive information on a confidential basis.

<u>ATTACHMENT B – BROADBAND ADOPTION METRICS</u>

Plan to be finalized by the company within 6 months	Data Set	
following Merger Closing Date:		
Personnel designated on adoption program	As of Merger Closing Date	
	(updated as changes apply)	
Tactics and institutional partners identified	As of Merger Closing Date	
	(updated as appropriate)	
Qualifying Lifeline customers identified	As of Merger Closing Date	
Total broadband adoption in the combined territory	As of Merger Closing Date	
Metrics to be reported semi-annually to the FCC:	Preceding 6-month Period	Cumulative
Qualifying customers who purchased broadband under		
discount program, by speed tier		
Qualifying customers who purchased computers under		
discount program		
Number of training programs and demonstrations held		
Number of people attending training programs and		
demonstrations		
Number of training DVDs and CDs shipped		
Number of enrolled customers who continue to subscribe to		
CenturyLink broadband service following expiration of their		
participation in the Adoption Program		
Total broadband adoption in the combined territory		
Total cost to the company of the Adoption Program		
Number of qualifying customers who discontinued CTL or Q		
broadband service		

<u>ATTACHMENT C – BUILDINGS FOR WHICH THE APPLICANTS COMMIT NOT TO RAISE RATES FOR SEVEN YEARS FOLLOWING MERGER CLOSING DATE</u>

1 Capital Drive	Eden Prairie	MN	55344
10 11 th Avenue N	Eden Prairie	MN	55344
10001 W 78 th Street	Eden Prairie	MN	55344
11010 Prairie Lakes Drive	Eden Prairie	MN	55344
113 S 6 th Street	Minneapolis	MN	55402
1820 Xenium Lane N	Plymouth	MN	55441
18790 W 78 th Street	Chanhassen	MN	55317
200 S 5 th Street	Minneapolis	MN	55402
2440 Galpin Court	Chanhassen	MN	55317
314 W 90 th Street	Bloomington	MN	55420
3601 Minnesota Drive	Bloomington	MN	55435
400 W 98 th Street	Bloomington	MN	55420
4141 Douglas Drive N	Crystal	MN	55422
4700 Welcome Avenue N	Crystal	MN	55429
5051 Highway 7	Minneapolis	MN	55416
605 Highway 169 N	Plymouth	MN	55441
6160 Golden Hills Drive	Golden Valley	MN	55416
6500 France Avenue S	Minneapolis	MN	55435
690 Coulter Drive	Chanhassen	MN	55317
70 W 4 th Street	St. Paul	MN	55102
710 Mendelssohn Avenue N	Golden Valley	MN	55427
7505 Metro Boulevard	Edina	MN	55439
7599 Corporate Way	Eden Prairie	MN	55344
7625 Smetana Lane	Eden Prairie	MN	55344
7711 Kerber Boulevard	Chanhassen	MN	55317
7800 Equitable Drive	Eden Prairie	MN	55343
8000 Audubon Road	Chanhassen	MN	55317
8080 Mitchell Road	Eden Prairie	MN	55344
8120 Penn Avenue S	Bloomington	MN	55431
90 Church Street SE	Minneapolis	MN	55455
9531 W 78 th Street	Eden Prairie	MN	55344
9625 W 76 th Street	Eden Prairie	MN	55344
9923 Valley View Road	Eden Prairie	MN	55344
100 E Lindstrom Street	Aberdeen	WA	98520
1700 Cherry Street	Aberdeen	WA	98520
2020 80 th Avenue	Tumwater	WA	98512
2109 Sumner Avenue	Aberdeen	WA	98520
301 S Faragut Street	Aberdeen	WA	98520
601 School Road	Aberdeen	WA	98520
900 Cleveland Street	Aberdeen	WA	98520