

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2018

<010> Study Area Code	522400
<015> Study Area Name	UTC OF THE NW-WA
<020> Program Year	2019
<030> Contact Name: Person USAC should contact with questions about this data	Kenneth W. Buchan
<035> Contact Telephone Number: Number of the person identified in data line <030>	3183621538 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	ken.buchan@centurylink.com
Form Type	54.313 and 54.422

(400) Number of Complaints per 1,000 customers
Data Collection Form

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<020> Program Year 2019

<030> Contact Name - Person USAC should contact regarding this data Kenneth W. Buchan

<035> Contact Telephone Number - Number of person identified in data line
<030> 3183621538 ext.

<039> Contact Email Address - Email Address of person identified in data line
<030> ken.buchan@centurylink.com

<400> Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.

<410> Complaints per 1000 customers for fixed voice

<420> Complaints per 1000 customers for mobile voice

(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

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<039>	Contact Email Address - Email Address of person identified in data line <030>	ken.buchan@centurylink.com
<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations
Data Collection Form**FCC Form 481
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ken.buchan@centurylink.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	522400wa610.pdf

**(900) Tribal Lands Reporting
Data Collection Form**

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<900> Does the filing entity offer tribal land services? (Y/N) Yes

See Line 920

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

522400WA920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(5) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

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<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 522400wa1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 522400wa1030.pdf

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<1140> Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<1210> Terms & Conditions of Voice Telephony Lifeline Plans	<div style="border: 1px solid black; width: 100%; height: 80px; margin-bottom: 5px;">522400wa1210.pdf</div> Name of Attached Document
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<1220> Link to Public Website	HTTP www.centurylink.com/tariffs/wa_ut-nw_gen_t_no_5.pdf www.centurylink.com/tariffs
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“Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
|--|-------------------------------------|
- | | |
|---|-------------------------------------|
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
|---|-------------------------------------|
- | | |
|---|-------------------------------------|
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |
|---|-------------------------------------|

(2005) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR 54.313(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4) Not Applicable

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband Not Applicable

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient? No

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2017.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A) Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation
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CAF BLS Reporting

- (3008A) Please indicate whether new locations were deployed during the prior calendar year. (Yes/No)
- (3008B) Please enter the number of new locations deployed in the prior calendar year associated with each of the following speed tiers.
- (3008B1) Number of newly built locations with access to broadband speeds of at least 10/1 Mbps but less than 25/3 Mbps.
- (3008B2) Number of newly built locations with access to broadband speeds of 25/3 Mbps or higher.
- (3008C) Please provide the percentage of deployment across the entire study area.

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued) Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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Financial Data Summary

(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide a list of newly served community anchor institutions.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas.

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	UTC OF THE NW-WA
Signature of Authorized Officer:	CERTIFIED ONLINE Date 07/06/2018
Printed name of Authorized Officer:	Jerry Allen
Title or position of Authorized Officer:	VP of Revenues
Telephone number of Authorized Officer:	3183889081 ext.
Study Area Code of Reporting Carrier:	522400 Filing Due Date for this form: 07/16/2018
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ken.buchan@centurylink.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

AFFIDAVIT CERTIFYING COMPLIANCE
WITH 47 C.F.R. §54.313(a)(1), §54.313(a)(2), and §54.313(a)(3)

Section (600) – Emergency Functionality Certification
Section (1000) – Voice and Broadband Service Rate Comparability Certifications; and
Accuracy of Annual Reporting of CAF Recipients Certification

For the CenturyLink ETCs as listed in Appendix A, I, Jerry M. Allen, being of lawful age and duly sworn, on my oath and under penalty of perjury, state that I am the Vice President of Customer Financial Services for CenturyLink, Inc. (“Company”) and that I am authorized to execute this affidavit on behalf of the Company.

The Company hereby certifies pursuant to the requirements under 47 C.F.R. §54.313(a)(1), §54.313(a)(2), and §54.313(a)(3) that:

- 1) CenturyLink is substantially able to remain functional in emergency situations as set forth in §54.202(a)(2),
- 2) The pricing of voice services provided by CenturyLink ETCs listed in Appendix A is no more than two standard deviations above the national average urban rate for voice service,
- 3) The pricing of broadband services provided by CenturyLink ETCs listed in Appendix A, that meet the Commission’s broadband public interest obligation is no more than the most recent applicable benchmark rates announced by the Wireline Competition Bureau, and
- 4) To the best of my knowledge and belief, the information reported on this form including attachments is accurate.

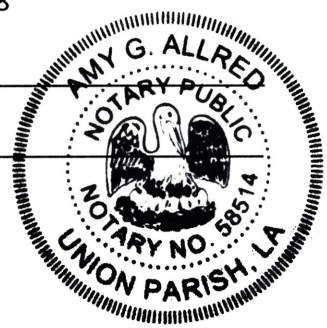
FURTHER AFFIANT SAYETH NOT.

Jerry M. Allen
Jerry M. Allen
VP – Customer Financial Services
CenturyLink
100 CenturyLink Drive
Monroe, Louisiana 71203

DATED this 2nd day of May 2018

SUBSCRIBED AND SWORN TO before me this 2nd day of May 2018

Notary Public: Amy G. Allred
My Commission Expires: upon death



Appendix A

Listing of CenturyLink Eligible Telecommunications Carriers

COMPANY NAME	DBA NAME	Study Area Code	State(s) of Operation
CenturyTel of Alabama, LLC (Northern)	CenturyLink	259789	AL
CenturyTel of Alabama, LLC (Southern)	CenturyLink	259788	AL
Gulf Telephone Company, LLC	CenturyLink	250298	AL
CenturyTel of Arkansas, Inc.	CenturyLink	401705	AR
CenturyTel of Central Arkansas, LLC	CenturyLink	401144	AR
CenturyTel of Mountain Home, Inc.	CenturyLink	401711	AR
CenturyTel of Redfield, Inc.	CenturyLink	401720	AR
CenturyTel of South Arkansas, Inc.	CenturyLink	401727	AR, LA
CenturyTel of Northwest Arkansas, LLC (Russellville)	CenturyLink	401142	AR, MO, OK
CenturyTel of Northwest Arkansas, LLC (Siloam Springs)	CenturyLink	401143	AR, OK
Qwest Corporation (Arizona)	CenturyLink QC	455101	AZ
CenturyTel of Colorado, Inc.	CenturyLink	462208	CO
Qwest Corporation (Colorado)	CenturyLink QC	465102	CO
The El Paso County Telephone Company	None	462187	CO
CenturyTel of Eagle, Inc.	CenturyLink	462185	CO, UT
Embarq Florida, Inc.	CenturyLink	210341	FL
Coastal Utilities, Inc.	CenturyLink	220356	GA
Qwest Corporation (Iowa)	CenturyLink QC	355141	IA
CenturyTel of Postville, Inc.	CenturyLink	351274	IA
CenturyTel of Chester, Inc.	CenturyLink	351126	IA, MN
CenturyTel of Idaho, Inc.	CenturyLink	472225	ID
CenturyTel of the Gem State, Inc. (Idaho)	CenturyLink	472223	ID
Qwest Corporation (Northern Idaho)	CenturyLink QC	475162	ID
Qwest Corporation (Southern Idaho)	CenturyLink QC	475103	ID
Gallatin River Communications L.L.C.	CenturyLink GRC	341057	IL
CenturyTel of Central Indiana, Inc.	CenturyLink	320747	IN
CenturyTel of Odon, Inc.	CenturyLink	320801	IN
United Telephone Company of Indiana, Inc.	CenturyLink	320832	IN, OH
United Telephone Company of Eastern Kansas	CenturyLink	411317	KS

COMPANY NAME	DBA NAME	Study Area Code	State(s) of Operation
United Telephone Company of Kansas	None	411842	KS
United Telephone Company of Southcentral Kansas	CenturyLink	411317	KS
Embarq Missouri, Inc. (Kansas)	CenturyLink	411957	KS
CenturyLink of Louisiana, LLC	CenturyLink	270434	LA, AR, TX
CenturyTel Midwest - Michigan, Inc.	CenturyLink	310671	MI
CenturyTel of Michigan, Inc.	CenturyLink	310702	MI
CenturyTel of Northern Michigan, Inc.	CenturyLink	310705	MI
CenturyTel of Upper Michigan, Inc.	CenturyLink	310689	MI
CenturyTel of Minnesota, Inc.	CenturyLink	361445	MN
Embarq Minnesota, Inc.	CenturyLink	361456	MN
Qwest Corporation (Minnesota)	CenturyLink QC	365142	MN
CenturyTel of Missouri, LLC (Belle-Herman)	CenturyLink	429785	MO
CenturyTel of Missouri, LLC (Central)	CenturyLink	429784	MO
CenturyTel of Missouri, LLC (Southern)	CenturyLink	429786	MO
CenturyTel of Missouri, LLC (Southwest)	CenturyLink	429787	MO
Spectra Communications Group, LLC	CenturyLink	421151	MO
Embarq Missouri, Inc. (Missouri)	CenturyLink	421957	MO, IA
CenturyTel of North Mississippi, Inc.	None	280458	MS
CenturyTel of Montana, Inc.	CenturyLink	482249	MT
Qwest Corporation (Montana)	CenturyLink QC	485104	MT
Central Telephone Company (North Carolina)	CenturyLink	230471	NC
Carolina Telephone and Telegraph Company, LLC	CenturyLink	230470	NC
Mehtel, Inc.	CenturyLink	230485	NC
Qwest Corporation (North Dakota)	CenturyLink QC	385144	ND
Qwest Corporation (Nebraska)	CenturyLink QC	375143	NE
United Telephone Company of the West (Nebraska)	CenturyLink	371595	NE
United Telephone Company of New Jersey, Inc.	CenturyLink	160138	NJ
CenturyTel of the Southwest, Inc.	CenturyLink	492274	NM
Qwest Corporation (New Mexico)	CenturyLink QC	495105	NM
Central Telephone Company (Nevada)	CenturyLink	552348	NV
CenturyTel of the Gem State, Inc. (Nevada)	CenturyLink	552223	NV
CenturyTel of Ohio, Inc.	CenturyLink	300630	OH
United Telephone Company of Ohio	CenturyLink	300661	OH

COMPANY NAME	DBA NAME	Study Area Code	State(s) of Operation
CenturyTel of Oregon, Inc.	CenturyLink	532361	OR
Qwest Corporation (Oregon)	CenturyLink QC	535163	OR
United Telephone Company of the Northwest (Oregon)	CenturyLink	532400	OR
CenturyTel of Eastern Oregon, Inc.	CenturyLink	532361	OR, CA
United Telephone Company of Pennsylvania LLC, The	CenturyLink	170209	PA
United Telephone Company of the Carolinas, LLC	CenturyLink of the Carolinas	240506	SC
Qwest Corporation (South Dakota)	CenturyLink QC	395145	SD
CenturyTel of Claiborne, Inc.	CenturyLink Claiborne	290557	TN
CenturyTel of Ooltewah-Collegedale, Inc.	CenturyLink Ooltewah-Collegedale	290574	TN
United Telephone Southeast, LLC (Tennessee)	CenturyLink	290567	TN
CenturyTel of Adamsville, Inc.	CenturyLink Adamsville	290552	TN, MS
Central Telephone Company of Texas, Inc.	CenturyLink	442114	TX
CenturyTel of Lake Dallas, Inc.	CenturyLink	442101	TX
CenturyTel of Port Aransas, Inc.	CenturyLink	442117	TX
CenturyTel of San Marcos, Inc.	CenturyLink	442140	TX
United Telephone Company of Texas, Inc	CenturyLink	442084	TX
Qwest Corporation (Utah)	CenturyLink QC	505107	UT
United Telephone Southeast, LLC (Virginia)	CenturyLink	190567	VA
Central Telephone Company of Virginia	CenturyLink	190254	VA, NC
CenturyTel of Inter-Island, Inc.	CenturyLink	522408	WA
CenturyTel of Washington, Inc.	CenturyLink	522408	WA
Qwest Corporation (Washington)	CenturyLink QC	525161	WA
United Telephone Company of the Northwest (Washington)	CenturyLink	522400	WA
CenturyTel of Cowiche, Inc.	CenturyLink	522410	WA
CenturyTel of Central Wisconsin, LLC	CenturyLink	331159	WI
CenturyTel of Fairwater-Brandon-Alto, LLC	CenturyLink	330877	WI
CenturyTel of Forestville, LLC	CenturyLink	330884	WI
CenturyTel of Larsen-Readfield, LLC	CenturyLink	330898	WI
CenturyTel of Monroe County, LLC	CenturyLink	330913	WI
CenturyTel of Northern Wisconsin, LLC	CenturyLink	330956	WI
CenturyTel of Southern Wisconsin, LLC	CenturyLink	330931	WI
CenturyTel of the Midwest-Kendall, LLC	CenturyLink	330924	WI

COMPANY NAME	DBA NAME	Study Area Code	State(s) of Operation
CenturyTel of the Midwest-Wisconsin, LLC (Casco)	CenturyLink	330857	WI
CenturyTel of the Midwest-Wisconsin, LLC (Cencom)	CenturyLink	330841	WI
CenturyTel of the Midwest-Wisconsin, LLC (Northwest)	CenturyLink	330922	WI
CenturyTel of the Midwest-Wisconsin, LLC (Platteville)	CenturyLink	330934	WI
CenturyTel of the Midwest-Wisconsin, LLC (Thorp)	CenturyLink	330959	WI
CenturyTel of the Midwest-Wisconsin, LLC (Wayside)	CenturyLink	330970	WI
CenturyTel of Wisconsin, LLC	CenturyLink	330895	WI
Telephone USA of Wisconsin, LLC	CenturyLink	331155	WI
CenturyTel of Northwest Wisconsin, LLC	CenturyLink	330950	WI, MN
CenturyTel of Wyoming, Inc.	CenturyLink	512299	WY
Qwest Corporation (Wyoming)	CenturyLink QC	515108	WY
United Telephone Company of the West (Wyoming)	CenturyLink of the West	511595	WY

(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	522400
<015>	Study Area Name	UTC OF THE NW-WA
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Kenneth W. Buchan
<035>	Contact Telephone Number - Number of person identified in data line <030>	3183621538 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken.buchan@centurylink.com
<810>	Reporting Carrier	United Telephone Company of the Northwest (Washington)
<811>	Holding Company	CenturyLink, Inc.
<812>	Operating Company	United Telephone Company of the Northwest (Washington)

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Bloomington Telephone Company, Inc.	310679	Unknown
	Broadwing Communications, LLC		None
	Carolina Telephone and Telegraph Company, LLC	230470	CenturyLink
	Central Telephone Company, Inc. (Nevada)	552348	CenturyLink
	Central Telephone Company, Inc. (North Carolina)	230471	CenturyLink
	Central Telephone Company of Texas, Inc.	442114	CenturyLink
	Central Telephone Company of Virginia, Inc.	190254	CenturyLink
	CenturyLink Communications, LLC		None
	CenturyLink of Louisiana, LLC	270434	CenturyLink
	CenturyTel Broadband Services, LLC		CenturyLink Broadband
	CenturyTel Midwest - Michigan, Inc.	310671	CenturyLink
	CenturyTel of Adamsville, Inc.	290552	CenturyLink Adamsville
	CenturyTel of Alabama, LLC (Northern)	259789	CenturyLink
	CenturyTel of Alabama, LLC (Southern)	259788	CenturyLink
	CenturyTel of Arkansas, Inc.	401705	CenturyLink
	CenturyTel of Central Arkansas, LLC	401144	CenturyLink
	CenturyTel of Central Indiana, Inc.	320747	CenturyLink
	CenturyTel of Central Wisconsin, LLC	331159	CenturyLink
	CenturyTel of Chester, Inc.	351126	CenturyLink
	CenturyTel of Claiborne, Inc.	290557	CenturyLink Claiborne
	CenturyTel of Colorado, Inc.	462208	CenturyLink
	CenturyTel of Cowiche, Inc.	522410	CenturyLink
	CenturyTel of Eagle, Inc.	462185	CenturyLink

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<812>	Operating Company	United Telephone Company of the Northwest (Washington)

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	CenturyTel of Eastern Oregon, Inc.	532361	CenturyLink
	CenturyTel of Fairwater-Brandon-Alto, LLC	330877	CenturyLink
	CenturyTel of Forestville, LLC	330884	CenturyLink
	CenturyTel of Idaho, Inc.	472225	CenturyLink
	CenturyTel of Inter-Island, Inc.	522408	CenturyLink
	CenturyTel of Lake Dallas, Inc.	442101	CenturyLink
	CenturyTel of Larsen-Readfield, LLC	330898	CenturyLink
	CenturyTel of Michigan, Inc.	310702	CenturyLink
	CenturyTel of Minnesota, Inc.	361445	CenturyLink
	CenturyTel of Missouri, LLC (Belle-Herman)	429785	CenturyLink
	CenturyTel of Missouri, LLC (Central)	429784	CenturyLink
	CenturyTel of Missouri, LLC (Southern)	429786	CenturyLink
	CenturyTel of Missouri, LLC (Southwest)	429787	CenturyLink
	CenturyTel of Monroe County, LLC	330913	CenturyLink
	CenturyTel of Montana, Inc.	482249	CenturyLink
	CenturyTel of Mountain Home, Inc.	401711	CenturyLink
	CenturyTel of North Mississippi, Inc.	280458	None
	CenturyTel of Northern Michigan, Inc.	310705	CenturyLink
	CenturyTel of Northern Wisconsin, LLC	330956	CenturyLink
	CenturyTel of Northwest Arkansas, LLC (Russellville)	401142	CenturyLink
	CenturyTel of Northwest Arkansas, LLC (Siloam Springs)	401143	CenturyLink
	CenturyTel of Northwest Wisconsin, LLC	330950	CenturyLink
	CenturyTel of Odon, Inc.	320801	CenturyLink

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<812>	Operating Company	United Telephone Company of the Northwest (Washington)

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	CenturyTel of Ohio, Inc.	300630	CenturyLink
	CenturyTel of Ooltewah-Collegedale, Inc.	290574	CenturyLink Ooltewah-Collegedale
	CenturyTel of Oregon, Inc.	532361	CenturyLink
	CenturyTel of Port Aransas, Inc.	442117	CenturyLink
	CenturyTel of Postville, Inc.	351274	CenturyLink
	CenturyTel of Redfield, Inc.	401720	CenturyLink
	CenturyTel of San Marcos, Inc.	442140	CenturyLink
	CenturyTel of South Arkansas, Inc.	401727	CenturyLink
	CenturyTel of Southern Wisconsin, LLC	330931	CenturyLink
	CenturyTel of the Gem State, Inc. (Idaho)	472223	CenturyLink
	CenturyTel of the Gem State, Inc. (Nevada)	552223	CenturyLink
	CenturyTel of the Midwest-Kendall, LLC	330924	CenturyLink
	CenturyTel of the Midwest-Wisconsin, LLC (Casco)	330857	CenturyLink
	CenturyTel of the Midwest-Wisconsin, LLC (Cencom)	330841	CenturyLink
	CenturyTel of the Midwest-Wisconsin, LLC (Northwest)	330922	CenturyLink
	CenturyTel of the Midwest-Wisconsin, LLC (Platteville)	330934	CenturyLink
	CenturyTel of the Midwest-Wisconsin, LLC (Thorp)	330959	CenturyLink
	CenturyTel of the Midwest-Wisconsin, LLC (Wayside)	330970	CenturyLink
	CenturyTel of the Southwest, Inc.	492274	CenturyLink
	CenturyTel of Upper Michigan, Inc.	310689	CenturyLink
	CenturyTel of Washington, Inc.	522408	CenturyLink
	CenturyTel of Wisconsin, LLC	330895	CenturyLink
	CenturyTel of Wyoming, Inc.	512299	CenturyLink

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<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Coastal Utilities, Inc.	220356	CenturyLink
	Embarq Florida, Inc.	210341	CenturyLink
	Embarq Minnesota, Inc.	361456	CenturyLink
	Embarq Missouri, Inc. (Kansas)	411957	CenturyLink
	Embarq Missouri, Inc. (Missouri)	421957	CenturyLink
	Gallatin River Communications L.L.C.	341057	CenturyLink GRC
	Global Crossing Americas Solutions, LLC		None
	Global Crossing Telecommunications, Inc.		None
	Gulf Telephone Company, LLC	250298	CenturyLink
	Hillsboro Telephone Company, Inc.	330892	Unknown
	IP Networks, Inc.		None
	Level 3 Communications, LLC		Level 3 Communications
	Level 3 Latin American Solutions, LLC		Level 3 Communications
	Level 3 Telecom Data Services, LLC		Level 3 Communications
	Level 3 Telecom of Alabama, LLC		Level 3 Communications
	Level 3 Telecom of Arizona, LLC		Level 3 Communications
	Level 3 Telecom of Arkansas, LLC		Level 3 Communications
	Level 3 Telecom of California, LP		Level 3 Communications
	Level 3 Telecom of Colorado, LLC		Level 3 Communications
	Level 3 Telecom of DC, LLC		Level 3 Communications
	Level 3 Telecom of Florida, LP		Level 3 Communications
	Level 3 Telecom of Georgia, LP		Level 3 Communications
	Level 3 Telecom of Hawaii, LP		Level 3 Communications

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<812>	Operating Company	United Telephone Company of the Northwest (Washington)

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Level 3 Telecom of Idaho, LLC		Level 3 Communications
	Level 3 Telecom of Illinois, LLC		Level 3 Communications
	Level 3 Telecom of Indiana, LP		Level 3 Communications
	Level 3 Telecom of Iowa, LLC		Level 3 Communications
	Level 3 Telecom of Kansas City, LLC		Level 3 Communications
	Level 3 Telecom of Kentucky, LLC		Level 3 Communications
	Level 3 Telecom of Louisiana, LLC		Level 3 Communications
	Level 3 Telecom of Maryland, LLC		Level 3 Communications
	Level 3 Telecom of Minnesota, LLC		Level 3 Communications
	Level 3 Telecom of Mississippi, LLC		Level 3 Communications
	Level 3 Telecom of Nevada, LLC		Level 3 Communications
	Level 3 Telecom of New Jersey, LP		Level 3 Communications
	Level 3 Telecom of New Mexico, LLC		Level 3 Communications
	Level 3 Telecom of New York, LP		Level 3 Communications
	Level 3 Telecom of North Carolina, LP		Level 3 Communications
	Level 3 Telecom of Ohio, LLC		Level 3 Communications
	Level 3 Telecom of Oklahoma, LLC		Level 3 Communications
	Level 3 Telecom of Oregon, LLC		Level 3 Communications
	Level 3 Telecom of South Carolina, LLC		Level 3 Communications
	Level 3 Telecom of Tennessee, LLC		Level 3 Communications
	Level 3 Telecom of Texas, LLC		Level 3 Communications
	Level 3 Telecom of Utah, LLC		Level 3 Communications
	Level 3 Telecom of Virginia, LLC		Level 3 Communications

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<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Level 3 Telecom of Washington, LLC		Level 3 Communications
	Level 3 Telecom of Wisconsin, LP		Level 3 Communications
	Mehtel, Inc.	230485	CenturyLink
	Qwest Corporation (Arizona)	455101	CenturyLink QC
	Qwest Corporation (Colorado)	465102	CenturyLink QC
	Qwest Corporation (Iowa)	355141	CenturyLink QC
	Qwest Corporation (Minnesota)	365142	CenturyLink QC
	Qwest Corporation (Montana)	485104	CenturyLink QC
	Qwest Corporation (Nebraska)	375143	CenturyLink QC
	Qwest Corporation (New Mexico)	495105	CenturyLink QC
	Qwest Corporation (North Dakota)	385144	CenturyLink QC
	Qwest Corporation (Northern Idaho)	475162	CenturyLink QC
	Qwest Corporation (Oregon)	535163	CenturyLink QC
	Qwest Corporation (South Dakota)	395145	CenturyLink QC
	Qwest Corporation (Southern Idaho)	475103	CenturyLink QC
	Qwest Corporation (Utah)	505107	CenturyLink QC
	Qwest Corporation (Washington)	525161	CenturyLink QC
	Qwest Corporation (Wyoming)	515108	CenturyLink QC
	Spectra Communications Group, LLC	421151	CenturyLink
	TelCove of Pennsylvania, LLC		None
	TelCove Operations, LLC		None
	Telephone USA of Wisconsin, LLC	331155	CenturyLink
	The El Paso County Telephone Company, Inc.	462187	CenturyLink

United Telephone Company of the Northwest d/b/a CenturyLink (Washington)

Study Area - 522400

Tribal Entities
Confederated Tribes and Bands of the Yakama Nation

United Telephone Company of the Northwest d/b/a CenturyLink (Washington)

Study Area - 522400

Targeted Engagement Efforts

As part of its efforts to strengthen positive relationships with the Tribal Nations within its serving territory while fulfilling obligations set forth in Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, United Telephone Company of the Northwest d/b/a CenturyLink (Washington) ("CenturyLink") extended invitations to the above listed tribal entity to meet and address issues of importance related to the provisioning of services on tribal lands. The purpose of these meetings was to discuss planning and potential deployment of service as well as other areas of interest specific to conducting business on tribal lands (as set forth in 47 C.F.R. §54.313(a)(9)) which at a minimum, would include:

(i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions;

(ii) Feasibility and sustainability planning;

(iii) Marketing services in a culturally sensitive manner;

(iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and

(v) Compliance with Tribal business and licensing requirements. Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services to the Tribes, Tribal members, or Tribal lands. These include certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government licensure.

Correspondence Resulting from Targeted Engagement Efforts

CenturyLink did not receive a response to the outreach letters sent in 2017.

EXHIBITS – Letters Extending Invitation to Meet

1. Exhibit WA UNW-1 – First outreach letter to the Confederated Tribes and Bands of the Yakama Nation
2. Exhibit WA UNW-2 – Second outreach via email to the Confederated Tribes and Bands of the Yakama Nation

Exhibit WA UNW-1



June 07, 2017

Confederated Tribes and Bands of the Yakama Nation
Chairman JoDe L Goudy
P.O. Box 151
Toppenish, WA 98948

Dear Chairman Goudy,

CenturyLink is proud to serve the Confederated Tribes and Bands of the Yakama Nation and understands the critical role communications services have for CenturyLink's customers living on Tribal lands.

I would like to extend an invitation to meet at your convenience to discuss these topics: (1) deployment planning with a focus on Tribal community anchor institutions; (2) feasibility and sustainability planning; (3) marketing services on Tribal lands; (4) rights-of-way processes, land use permitting, facilities siting, environmental and cultural preservation review process; and (5) Tribal business and licensing requirements. Please return the enclosed reply form and self-addressed envelope to arrange a meeting to discuss any of the above topics. Effective December 2, 2016, the Federal Communications Commission introduced changes to the Lifeline program, including identifying certain broadband services as eligible for Lifeline discounts and making changes to the recertification process¹. CenturyLink is proud to participate in the Lifeline program and looks forward to improving access to communications services for customers living on Tribal lands. Please let me know if you are interested in receiving information and resources about CenturyLink's Lifeline program. CenturyLink looks forward to working with you to close the digital divide for customers living on Tribal lands. Please feel free to contact me at 509-235-3112 or Sandz.Hinrichs@centurylink.com with any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Sandz Hinrichs".

Sandz Hinrichs
CenturyLink

Enclosure

¹ *In the Matter of Lifeline and Link Up Reform and Modernization; Telecommunications Carrier Eligible for Universal Service Support; Connect America Fund, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, Adopted March 31, 2006, Released April 27, 2016.*



Reply to CenturyLink's Request for Meeting

CenturyLink Representative's Contact Information

Name:	Sandz Hinrichs
Title:	Manager Region Operations II
Phone Number:	509-235-3112
Address:	111 A Street, Cheney, WA 99004
Email:	Sandz.Hinrichs@centurylink.com

**Primary Tribal Representative's Contact Information
The Confederated Tribes and Bands of the Yakama Nation**

Name:	
Title:	
Phone Number:	
Address:	
Email:	

Additional Tribal Representative's Contact Information (if needed)

Name:	
Title:	
Phone Number:	
Address:	
Email:	

Name:	
Title:	
Phone Number:	
Address:	
Email:	

Name:	
Title:	
Phone Number:	
Address:	
Email:	

Proposed Dates for Face-to-Face Meeting(s)	
When:	
Where:	
Alternative Dates:	

Tentative Agenda/Topics for Discussion for Proposed Meeting

Please Return This Completed Form To:
<p>Centurylink Sandz Hinrichs Manager Region Operations II CenturyLink 111 A Street, Cheney, WA 99004 509-235-3112 509-455-3188 fax Sandz.Hinrichs@centurylink.com</p>

Exhibit WA UNW-2

Solano, Donna

From: Huff, Loretta
Sent: Sunday, December 31, 2017 9:41 PM
To: Tribal Outreach
Subject: CenturyLink Outreach regarding Services

Good day,

CenturyLink reached out to you earlier in 2017. As we look forward into 2018, we wish to reiterate our interest in working with you.

We would like to extend an invitation to meet at your convenience to discuss any of these topics: (1) deployment planning with a focus on Tribal community anchor institutions; (2) feasibility and sustainability planning; (3) marketing services on Tribal lands; (4) rights-of-way processes, land use permitting, facilities siting, environmental and cultural preservation review process; and (5) Tribal business and licensing requirements. To request a meeting, please respond to this e-mail by completing the reply form shown below.

Also, CenturyLink would like to take this opportunity to remind you of recent changes to the Lifeline program that may be of benefit. In March 2016, the Federal Communications Commission announced a plan to include broadband services as part of the Lifeline program beginning December 1, 2016. CenturyLink is proud to participate in the Lifeline program. Please respond if you are interested in receiving information and resources regarding CenturyLink's Lifeline program.

CenturyLink looks forward to working with you to close the digital divide for customers living on Tribal lands. Please reply with any questions you may have regarding this e-mail or to request a face-to-face meeting.

Sincerely,

CenturyLink

Reply to CenturyLink's Request for Meeting

Primary Tribal Representative's Contact Information	
Tribe Name:	
Contact Name:	
Title:	
Phone Number:	
Address:	
Email:	

Additional Tribal Representative's Contact Information (If needed)	
Name:	
Title:	
Phone Number:	
Address:	
Email:	

Name:	
Title:	
Phone Number:	
Address:	
Email:	

Name:	
Title:	
Phone Number:	
Address:	
Email:	

Proposed Dates for Face-to-Face Meeting(s)	
When:	
Where:	
Alternative Dates:	

Tentative Agenda/Topics for Discussion for Proposed Meeting	

Please Return This Completed Form To:

Tribal_Outreach@centurylink.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

CenturyLink, Inc. has over 100 local exchange carriers (LECs) that serve as eligible telecommunications carriers (ETCs) providing Lifeline discounts on local telephone service for qualifying low-income customers in thirty-seven states. Each LEC's tariff or local terms of service contain the terms and conditions of voice telephony service plans generally available to CenturyLink residential customers. Lifeline provides discounts on CenturyLink residential service plans that include voice telephony service. Lifeline discounts provided to qualified recipients include the \$9.25 per month federal discount plus state discounts, if available. Tribal Lifeline recipients receive an additional federal Lifeline discount of up to \$25 per month. Eligible residents residing on Tribal lands in areas where CenturyLink receives universal service high-cost support can also receive a Tribal Link Up credit of not more than \$100 against one customary service initiation fee at a primary residence.

CenturyLink's flat-rated residential voice service plans provide unlimited local calling. Lifeline discounts also may be applied to local residential service plans that include a certain amount of local minutes or calls at a flat-rate and then have additional charges for minutes or calls beyond those included in the plan. Lifeline discounts may be applied to bundled service packages that include voice telephony services, such as bundles with internet service and/or video service. Lifeline discounts may also apply to voice service plans that include optional calling features such as caller ID, call waiting, and voicemail.

Toll service is available to customers receiving Lifeline discounts in the same manner that it is available to non-Lifeline customers. Toll limitation service is available to Lifeline customers at no charge.

Information concerning CenturyLink's Lifeline program can be found on our Lifeline web page at <http://www.centurylink.com/Pages/Support/LifeLine/>

A link to the CenturyLink tariff or local terms of service that includes the terms and conditions of this ETC's Lifeline offering is included in response to line 1220.

NOTES:

1. (210), (220), (400) – (420), (515) These questions are not applicable per FCC 17-87 released July 7, 2017.
2. (610) Section 54.313(a) (1) requires ETCs to make certifications as to their ability to remain functional in emergency situations as set forth in section 54.202(a) (2). The certification is attached.
3. (810) – (813) Per FCC DA 13-1707 released August 6, 2013, CenturyLink is reporting holding company, operating companies, and affiliates (as defined under section 3 of the Communications Act of 1934, as amended, 47 U.S.C. § 153(2)) that are designated as eligible telecommunications carriers and/or that provide retail broadband internet access to end-user customers.
4. (810) – (813) and (1210) – (1223) CenturyLink is a designated eligible telecommunications carrier that receives Universal Service Support for High Cost Areas under 47 C.F.R. 54 subpart D. Therefore, CenturyLink is only subject to subpart (a) of 47 C.F.R. §54.422 as it applies to this filing.
5. (900) – (929) To the extent the carrier serves federally recognized tribal lands, the attached narrative, in response to line 920, should be relied on to describe tribal outreach and interaction. If in 2017, the carrier offered to discuss the points listed in 47 C.F.R. §54.313(a) (5) to at least a majority of federally recognized tribes served in a study area, lines 921-929 were marked with a “yes” response.
6. (1000) – (1010) Carriers must certify that their local rates are at or below two standard deviations of the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau. Qwest Corporation d/b/a CenturyLink (Wyoming) and United Telephone Company of the West d/b/a CenturyLink (Wyoming) have certain exchanges with explicit cost based local rates above this standard. Customers in such exchanges receive a Federal Universal Service credit and/or a State Universal Service credit explicitly on their bill. This results in a net charge that is lower than two standard deviations of the applicable national average urban rate for voice service.
7. (1010) 47 C.F.R. §54.313(a) (2) requires a certification that the pricing of the company's voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau. The certification is attached.
8. (1030) 47 C.F.R. §54.313(a) (3) requires a certification that the pricing of a service that meets the Commission's broadband public interest obligations is no more than the applicable benchmark to be announced annually in a public notice issued by the Wireline Competition Bureau, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support. The certification is attached.
9. (1130) This question is not applicable. This company has existing terrestrial backhaul options.
10. (1220) Due to character size limitations in the form, some links were truncated. To read complete terms and conditions, please visit the following website: <http://www.centurylink.com/aboutus/legal/tariff-library.html?search=tariffs>.

11. (2015) and (2016) Per FCC DA 13-2101 released October 30, 2013, CenturyLink is certifying at a holding company level.
12. (2015), (2017) – (2018) Connect America Fund Phase 2 program (including phase-down support) acceptance and commitments are at a state-wide level. State level reporting is recorded on one study-area per state.
13. (2017c) Reported capital expenditures represent investments in specific Connect America Fund Phase 2 (“CAF II”) projects. There may be additional investments in facilities which would benefit CAF II areas that are not reflected in this response.
14. (2018) CenturyLink has provided Connect America Fund Phase 2 community anchor institutions that were enabled and listed as anchor institutions on the National Broadband Map.
15. (3008) – (3034) These questions are not applicable. This company is considered to be a Federal Price Cap Carrier or an affiliate associated with a Federal Price Cap Carrier for the purposes of this filing.
16. (4001) – (4003) These questions are not applicable. This company is not a Rural Broadband Experiment participant.
17. (5010) – (5013) These questions are not applicable. This company is not an Alaska Plan participant.
18. Effective January 1, 2017, eight Louisiana ILECs have merged into CenturyTel of Evangeline, LLC with study area code 270434. Following the merger, CenturyTel of Evangeline, LLC changed its name to CenturyLink of Louisiana, LLC. For Form 481 reports due in July 2018 the merged companies are reported as one legal entity.