CENTURYLINK

1600 7th Avenue, Room 1506 Seattle, Washington 98191 (206) 345-6224 (425) 301-8411 (cell)

Email: phil.grate@centurylink.com

Philip E. Grate

State Regulatory Affairs Director Public Policy

July 12, 2018

CenturyLink™

Mr. Mark L. Johnson **Executive Director and Secretary** Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, Washington 98504

> Re: CenturyLink 2018 Federal ETC Filing

> > United Telephone of the Northwest (Washington) dba

CenturyLink

Dear Mr. Johnson:

On November 18, 2011 the Federal Communications Commission ("FCC") released its *USF/ICC* Transformation Order in WC Docket No. 10-90 et al. With that Order, the FCC began a transition to a national framework for certification of Eligible Telecommunications Carriers ("ETCs") and set forth a standard set of information that all ETCs must file with the FCC typically by July 1st of each year. The Order also required ETCs to provide the same information to the respective state commissions.

Annual ETC reporting requirements for recipients of federal high-cost support are contained in 47 C.F.R. § 54.313 of the FCC's rules. For the reporting of most of the data and certifications required by 47 C.F.R. §§ 54.313 and 54.422, the FCC has developed a reporting template, Form 481, to be utilized by ETCs.

Beginning with the filing due this year (which this year has been extended to July 16), the FCC Form 481 no longer requires that high-cost recipients file information regarding network outages; unfulfilled service requests; the number of complaints received by an ETC per 1,000 subscribers for voice and broadband services; and pricing for voice and broadband services. The FCC Form 481 also no longer includes certifications for high-cost recipients regarding service quality standards and consumer protection rules. Finally, the FCC centralized filing of the FCC Form 481 such that one filing is made with the Universal Service Administrative Company (USAC) and ETCs no longer file duplicate copies of FCC Form 481 with the FCC and with states, U.S. Territories, and/or Tribal governments.

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These filings are now provided to USAC through their online "E-File" portal and are available to state commissions through the portal. State commissions can contact USAC for additional information on obtaining FCC Form 481 information from the portal.

Attached, pursuant to state requirements, is a copy of the FCC Form 481 as filed by CenturyLink with USAC on or before July 16. The form is also available electronically through the USAC portal as noted above.

Consistent with past years, we request that you certify to the FCC pursuant to 47 C.F.R § 54.314 by October 1, 2018 in order for CenturyLink to continue receiving Federal high cost support in Washington.

Please do not hesitate to contact me should you have any questions regarding this filing.

Sincerely,

Philip E. Grate

State Regulatory Affairs Director

(206) 345-6224

phil.grate@centurylink.com

PEG/jga Enclosures