



June 26, 2015

Mr. Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, Washington 98504  
(360) 664-1160

Re: 2014 ETC Certification and Request for Certification Pursuant to  
WAC 480-123-060, WAC 480-123-070, WAC 480-13-080, and 47  
C.F.R. §54.314.

Dear Mr. King:

Pursuant to WAC 480-123-060, WAC 480-123-070 and WAC 480-13-080, United Telephone Company of the Northwest d/b/a CenturyLink (Washington) ("Company") hereby requests that the Washington Utilities and Transportation Commission certify that the Company has met the requirements of 47 C.F.R. §54.314 for eligibility for continued receipt of federal high-cost funds. The certifications and reports that are specified in WAC 480-123-060, WAC 480-123-070, and WAC 480-123-080 are enclosed.

The Company also requests that the attachments entitled "CONFIDENTIAL EXHIBIT C", "CONFIDENTIAL EXHIBIT D", and "CONFIDENTIAL EXHIBIT E" be treated as confidential. The schedules contain information that is quite detailed as to type of equipment, location, and cost. Therefore, the Company claims that the information on the schedules is confidential under RCW 80.04.095 in that it constitutes valuable commercial information in the form of network configuration, design, and financial information.

100 CenturyLink Drive  
Monroe, LA 71203  
Tel: 318.388.9000  
[www.centurylink.com](http://www.centurylink.com)

Should you have any questions, please contact Mark Reynolds at (206) 345-1568 or myself at (318) 330-6616.

Sincerely,

A handwritten signature in black ink that reads "Khurram Shakir". The signature is written in a cursive style with a horizontal line underlining the name.

Khurram Shakir  
Senior Regulatory Analyst  
CenturyLink

Enclosures

**2015 ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION  
REPORT AS REQUIRED BY WAC 480-123-060, WAC 480-123-070,  
AND WAC 480-123-080  
UNITED TELEPHONE COMPANY OF THE NORTHWEST D/B/A  
CENTURYLINK (WASHINGTON)**

United Telephone Company of the Northwest d/b/a CenturyLink (Washington) (“Company”) hereby submits the following report in accordance with WAC 480-123-060, WAC 480-123-070, and WAC 480-123-080.

**WAC 480-123-060 Annual certification of eligible telecommunications carriers.**

(1) Each ETC seeking certification of the ETC's use of federal high-cost funds pursuant to 47 C.F.R. § 54.314 must request certification by July 1st each year. The ETC must certify that all federal high-cost support provided to the ETC within Washington State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The certification must be submitted by a company officer in the manner required by RCW 9A.72.085.

**Response:** Certification attached as Exhibit A.

(2): The commission will certify an ETC's use of federal high-cost universal service fund support, pursuant to 47 C.F.R. § 54.314 only if the ETC complies with the requirements in WAC 480-123-070, and the ETC demonstrates that it will use federal high-cost funds only for the provision, maintenance, and upgrading of facilities and services for which the support is intended through the requirements of WAC 480-123-080.

**Response:** See responses to WAC 480-123-070 and WAC 480-123-080 below.

**WAC 480-123-070 Annual certifications and reports.**

Not later than July 1st of each year, every ETC that receives federal support from any category in the federal high-cost fund must certify or report as described in this section. The certifications and reports are for activity related to Washington State in the period January 1st through December 31st of the previous year. A company officer must submit the certifications in the manner required by RCW 9A.72.085.

**(1) Report on use of federal funds and benefits to customers.**

(a) The report must provide a substantive description of investments made and expenses paid with support from the federal high-cost fund.

The report must include the company's gross capital expenditures and operating expenses made with federal high-cost support received by the ETC in the preceding calendar year along with a description of major projects and affected exchanges. A rate-of-return wireline ETC must also include a copy of its NECA-1 report for the preceding calendar year.

**Response:** Attached as Exhibit B is a copy of the Company's NECA-1 Report associated with the Company's operations in 2010. The plant investment and expense amounts listed on the report represent the basis for federal high cost funding support received in 2011. The attached report is also the basis of current support levels. Per FCC 11-161, the Connect America Fund order, current universal service funding levels are frozen based on the amount of support that was received by each company in 2011. Additionally, attached as Confidential Exhibit C is a Company report labeled USF 1010, showing the same type of information as the NECA-1 report. This report reflects the Company's continued operations in 2014. Confidential Exhibit C contains confidential financial information as recognized under RCW 80.04.095. Therefore the schedule is being submitted as a CONFIDENTIAL document under WAC 480-07-160 and RCW 80.04.095.

(b) Every ETC must provide a substantive description of the benefits to consumers that resulted from the investments and expenses reported pursuant to (a) of this subsection.

**Response:** The Company reports that the investment in plant and the expenses reported in Exhibit B and Confidential Exhibit C submitted herewith provide very direct and substantial benefits to consumers. Over the years the Company has invested millions of dollars in building, maintaining, and operating a telecommunications network in the state of Washington. It is the growth, enhancement, and continued viability of this network that give consumers in the Company's service territory access to services that are vital in meeting their telecommunications needs. The expenditures reflected in the Company's exhibits have allowed the Company to provide services that meet the expectations addressed in 47 U.S.C. 254 for consumers in the service area for which the Company is designated as an Eligible Telecommunication Carrier.

The expenditures reflected in Exhibit B and Confidential Exhibit C were directed to assuring that the network is positioned to meet the ever increasing needs and expectations of consumers. The company's expenditures included projects to increase network capacity. <sup>1</sup>For example, projects that added fiber or cable to the network increased the network's capacity. Consumers benefit from increased capacity in that it allows additional consumers to join or access the network, allows additional services to be offered over the network, and reduces the likelihood that calls will be blocked.

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<sup>1</sup> Exhibit B and Confidential Exhibit C do not identify expenditures at the project level. The projects underlying the expenditures on these reports would tend to be very similar to those identified in response to WAC 480-123-080 (1) which does identify certain planned expenditures at the project level.

Company expenditures have also gone to maintaining and increasing network reliability. Ability to access the network during periods of power outages clearly benefits the health and safety of consumers. Network reliability also benefits consumers by generally increasing the overall quality of service.

**(2) Local service outage report.**

(a) The report must include detailed information on any outage in the service area (during the prior calendar year) of at least thirty minutes in duration in which the ETC owns, operates, leases, or otherwise utilizes facilities, that potentially affect:

- (i) At least ten percent of the end users; or
- (ii) A 911 special facility, as defined in 47 C.F.R. § 4.5(e)

(b) Specifically, the eligible telecommunications carrier's annual report must include information detailing:

- (i) The date and time of onset and duration of the outage;
- (ii) A brief description of the outage and its resolution;
- (iii) The particular services affected;
- (iv) The geographic areas affected by the outage;
- (v) Steps taken to prevent a similar situation in the future; and
- (vi) The number of customers affected.

**Response:** Please see FCC Form 481 filed on June 23, 2015 in Docket UT-150063.

**(3) Report on failure to provide service.** The report must include the number of requests for service from potential customers within its designated service area that were unfulfilled during the prior calendar year. The ETC must also detail how it attempted to provide service to those potential customers.

**Response:** The Company reports that there were no outstanding requests for service from 2014 that are unfulfilled at the time of this filing.

**(4) Report on complaints per one thousand connections (fixed or mobile).** The report must provide separate totals for the number of complaints that the ETC's customers made to the Federal Communications Commission and the Consumer Protection Division of the Office of the Attorney General of the State of Washington. The ETC must also report the number of consumer complaints in each general category (for example, billing disputes, service quality).

**Response:** As the Company reported on the FCC Form 481, there were .35 complaints per thousand access lines during calendar year 2014 for voice services as reported to any federal and/or state agencies, including the Federal Communications Commission, the Consumer Protection Division of the Office of the Attorney General of the State of Washington, and the Washington Utilities and Transportation Commission.

The Company reports that there were .22 complaints per thousand access lines during calendar year 2014 for voice services as reported to the Federal Communications Commission and the Consumer Protection Division of the Office of the Attorney General of the State of Washington.

Company had 5 complaints to the FCC. The complaints were as follows:

- 4 – Billing or Pricing Disputed, resolved by explanation of charges or crediting account.
- 1 – Performance or Repair, resolved by providing explanation or service.

Company had 5 complaints to the Office of Attorney General. The complaints were as follows:

- 5 – Billing or Pricing Disputed, resolved by explanation of charges or crediting account.

**(5) Certification of compliance with applicable service quality standards and consumer protection rules.** Certify that it met substantially the applicable service quality standards and consumer protection rules found in WAC 480-123-030 (1)(h).

**Response:** Certification attached as Exhibit A.

**(6) Certification of ability to function in emergency situations.** Certify that it had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g).

**Response:** Certification attached as Exhibit A.

**(7) Advertising certification, including advertisement on Indian reservations.** Certify it has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the ETC's designated service area. Such publicity should include advertisements likely to reach those who are not current customers of the ETC within its designated service area.

**Response:** Certification attached as Exhibit A.

**(8) Report filing alternatives.** To the extent the company has filed a report with a federal agency that provides the data requested by the commission, the company can refer to that docket number and the date the information was filed with the commission.

### **WAC 480-123-080 Annual plan for universal service support expenditures.**

(1) Not later than July 1st of each year, every ETC that receives federal support from any category in the federal high-cost fund must report the planned use of federal support related to Washington state that will be received during the coming calendar year. The report must include the company's planned gross capital expenditures and operating expenses made with federal high-cost support received by the ETC for the coming

calendar year along with a description of major projects and affected exchanges.

**Response:** The Company submits herewith Confidential Exhibit D. The schedule is not all-inclusive of the Company's planned capital expenditures but does list some of the more significant projects the Company is undertaking in 2015. The exhibit also includes a 2015 plan. The exhibit is quite detailed with regard to equipment, location, and cost and therefore constitutes valuable commercial information in the form of network configuration and design information as recognized under RCW 80.04.095. Therefore the schedule is being submitted as a CONFIDENTIAL document under WAC 480-07-160 and RCW 80.04.095. The Company also expects to incur expenses associated with maintaining and operating its network in the state of Washington at a level that will be similar to the expenses indicated on Exhibit B and Confidential Exhibit C submitted in response to WAC 480-123-070(1)(a). The Company also submits Confidential Exhibit E. The exhibit describes the status of construction projects during 2014 and is being submitted as a CONFIDENTIAL document under WAC 480-07-160 and RCW 80.04.095.

(2) The report must include a substantive plan of the investments and expenditures to be made with federal support and a substantive description of how those investments and expenditures will benefit customers.

**Response:** The Company states that federal support will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended under 47 U.S.C. 254. The federal support will be used to fund operation of, and improvements to, the network, including some of the various projects included in Confidential Exhibit D as well as expenses at a level similar to that indicated in Exhibit B and Confidential Exhibit C submitted in response to WAC 480-123-070(1)(a). The Company's use of federal support in this manner will benefit consumers. As discussed previously in this report, these types of expenditures will serve to sustain and improve network capacity and reliability. This network capacity and reliability is essential to providing the level of service anticipated in 47 U.S.C. 254 and therefore benefits consumers.

For more specific consumer benefits associated with planned expenditures, the Company incorporates by reference the column of the Confidential Exhibit D schedule that is entitled "Narrative." The narrative for each project on the schedule identifies specific improvements that will benefit consumers in specific areas.

(3) As part of the initial ETC petition for federal high-cost support, and at least once every three years thereafter, a wireless ETC must submit a map in .shp format that shows the general location where it provides commercial mobile radio service signals.

**Response:** This is not applicable to the Company, as it is not a wireless ETC.

# EXHIBIT A



**AFFIDAVIT CONTAINING CERTIFICATIONS  
AS REQUIRED BY WAC 480-123-060 AND WAC 480-123-070**

I, David D. Cole, being of lawful age and duly sworn, on my oath state that I am Executive Vice President and Controller for CenturyLink, Inc. and an officer of United Telephone Company of the Northwest d/b/a CenturyLink ("Company"), that I am authorized to execute this affidavit on behalf of the Company, and that the facts set forth in this affidavit and the accompanying reports are true to the best of my knowledge, information, and belief. On this basis, I hereby certify to the Washington Utilities and Transportation Commission ("Commission") for use by the Commission in providing the certification to the Federal Communications Commission and Universal Service Administrative Company required by 47 C.F.R. §54.314, as follows:

(1) That all federal high-cost support received by the Company within Washington was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended;

(2) That during the 2014 calendar year, the Company substantially met the applicable service quality standards and consumer protection rules found in WAC 480-123-030(1)(h);

(3) That during the 2014 calendar year, the Company had the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wire line carriers in emergency situations; and

(4) That during the 2014 calendar year, the Company publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of and federally recognized Indian Reservations within the Company's service area and, in a manner which, in the Company's judgment, included advertisements likely to reach those who are not current customers of the Company within the Company's designated service area.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.

Dated this 25<sup>th</sup> day of June, 2015

Company: United Telephone Company of the Northwest d/b/a CenturyLink

By: [Signature]  
David D. Cole, Executive Vice President and Controller

Subscribed to and sworn before me this 25<sup>th</sup> day of June, 2015 in Monroe, Louisiana.

[Signature]  
Notary Public 58514  
Amy G. Allred  
Printed Name of Notary

My Commission Expires: upon death

# EXHIBIT B



USF1010 ERROR REPORT

Applies to Period:	Year End 12/2010	Reg: 2	SOUTHERN	Subset 2
Contact Name:	Donnie Aultman	MSM: 000021047	Marilyn Stewart	
Contact Phone:	(318)-388-9497 Ext:	OO: 200000016	CenturyTel, Inc. dba CenturyLink	
Release Status:	Not Released	Co: 200000012	Embarq Corporation dba CenturyLink	
Soft Edit Status:	Passed Edit	SAR: 522400	UTC OF THE NW-WA	

Description	Pending View	Message
060 Total Loops	61,981	
070 Cat. 1.3 Loops	57,069	
160 Account 2001	266,468,093	
170 Account 1220	14,749	
190 Account 3100	199,958,605	
195 Account 3400	109,744	
210 Account 4340	1,794,183	
220 Net Plant Investment	64,620,310	
230 Account 2210	45,752,046	
235 Account 2220	0	
240 Account 2230	65,972,820	
245 Total Central Office	111,724,866	
250 Ckt Equip Cat 4.13	25,886,652	
255 Account 2410	142,041,949	
260 Account 3100 (2210)	45,145,957	
265 Account 3100 (2220)	0	
270 Account 3100 (2230)	44,779,208	
275 Account 3100 (2210-2230)	89,925,165	
280 Account 3100 (2410)	105,339,561	
310 Account 4340 (2210)	308,058	
315 Account 4340 (2220)	0	
320 Account 4340 (2230)	444,208	
325 Account 4340 (2210-2230)	752,266	
330 Account 4340 (2410)	956,397	
335 Account 6110 Total	39,987	
340 Account 6110 Benefits	3,648	
345 Account 6110 Rents	130	
350 Account 6120 Total	1,011,951	
355 Account 6120 Benefits	47,187	
360 Account 6120 Rents	187,060	
365 Account 6210 Total	1,385,301	
370 Account 6210 Benefits	205,977	
375 Account 6210 Rents	3,411	
380 Account 6220 Total	0	
385 Account 6220 Benefits	0	
390 Account 6220 Rents	0	
395 Account 6230 Total	659,730	
400 Account 6230 Benefits	115,362	
405 Account 6230 Rents	1,218	
410 Account 6210-6230	2,045,031	
430 Account 6410 Total	4,975,519	
435 Account 6410 Benefits	738,021	
440 Account 6410 Rents	958,430	
445 Total Plant Specific	8,072,488	
450 Account 6530 Total	2,890,242	
455 Account 6530 Benefits	313,906	
510 Account 6560 (2210)	1,766,854	
515 Account 6560 (2220)	0	
520 Account 6560 (2230)	4,479,282	



USF1010 ERROR REPORT

Applies to Period:	Year End 12/2010	Reg: 2	SOUTHERN	Subset 2
Contact Name:	Donnie Aultman	MSM: 000021047	Marilyn Stewart	
Contact Phone:	(318)-388-9497 Ext:	OO: 200000016	CenturyTel, Inc. dba CenturyLink	
Release Status:	Not Released	Co: 200000012	Embarq Corporation dba CenturyLink	
Soft Edit Status:	Passed Edit	SAR: 522400	UTC OF THE NW-WA	

Description	Pending View	Message
525 Account 6560 (2210-2230)	6,246,136	
530 Account 6560 (2410)	5,263,452	
535 Account 6710 Total	352,077	
540 Account 6710 Benefits	88,196	
550 Account 6720 Total	4,338,699	
555 Account 6720 Benefits	598,991	
565 Sum of Lines 535 + 550	4,690,776	
600 Ben. Por. of all Op. Exp.	2,776,450	
610 Rent Por. of all Op. Exp.	1,150,249	
650 Account 7200 Other Taxes	5,287,738	
700 2410 (C S Total CWF - AV)	139,536,484	
710 2410 (C S CWF - Cat.1)	129,336,152	
800 Account 2680 Total	124,139	
805 Account 2680 (2230)	0	
810 Account 2680 (Cat. 4.13)	0	
815 Acc 2680 (2410) Total CWF	0	
820 Acc 2680 (2410)CWF-Cat1	0	
830 Account 6560 (2680)	0	
Control Total:	1,541,804,161	

Comments:

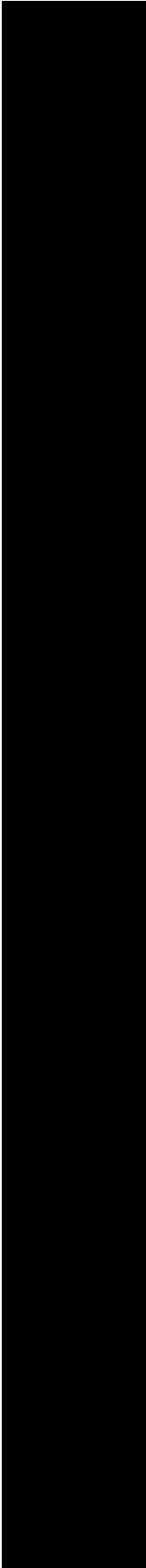
**CONFIDENTIAL**  
**EXHIBIT C**

USF1010

Study Area: United Telephone Company of the Northwest, Inc. (Washington) (SAC 522400)

Year End 12/31/2014

Description	
(060)	Total Loops
(070)	Category 1.3 Loops
(160)	a. Acct 2001
(170)	b. Acct 1220
(190)	c. Acct 3100
(195)	d. Acct 3400
(210)	g. Acct 4340
(220)	h. Net Plant Investment
(230)	a. Acct 2210
(235)	b. Acct 2220
(240)	c. Acct 2230
(245)	d. Total Central Office
(250)	e. Circuit Equip Cat 4.13
(255)	f. Acct 2410
(260)	g. Acct 3100(2210)
(265)	h. Acct 3100(2220)
(270)	i. Acct 3100(2230)
(275)	j. Acct 3100(2210-2230)
(280)	k. Acct 3100(2410)
(310)	q. Acct 4340(2210)
(315)	r. Acct 4340(2220)
(320)	s. Acct 4340(2230)
(325)	t. Acct 4340(2210-2230)
(330)	u. Acct 4340(2410)
(335)	a. Acct 6110
(340)	b. Acct 6110 (benefits)
(345)	c. Acct 6110 (rents)
(350)	d. Acct 6120
(355)	e. Acct 6120 (benefits)
(360)	f. Acct 6120 (rents)
(365)	g. Acct 6210
(370)	h. Acct 6210 (benefits)
(375)	i. Acct 6210 (rents)
(380)	j. Acct 6220
(385)	k. Acct 6220 (benefits)
(390)	l. Acct 6220 (rents)
(395)	m. Acct 6230
(400)	n. Acct 6230 (benefits)
(405)	o. Acct 6230 (rents)
(410)	p. Acct 6210-6230
(430)	t. Acct 6410
(435)	u. Acct 6410 (benefits)
(440)	v. Acct 6410 (rents)
(445)	Total Plant Specific
(450)	a. Acct 6530
(455)	b. Acct 6530 (benefits)
(510)	a. Acct 6560(2210)
(515)	b. Acct 6560(2220)
(520)	c. Acct 6560(2230)
(525)	d. Acct 6560(2210-2230)
(530)	e. Acct 6560(2410)
(535)	a. Acct 6710
(540)	b. Acct 6710 (benefits)
(550)	c. Acct 6720
(555)	d. Acct 6720 (benefits)
(565)	e. (sum of lines 535+550)
(600)	a. Benefits Portion
(610)	b. Rents Portion
(650)	a. Acct 7200
(700)	1. Cost Study Avg C&WF Acct 2410
(710)	2. Cost Study Avg C&WF Cat 1
(800)	Acct. 2680 Tot Assets
(805)	Acct. 2680 (2230) COE Trans
(810)	Acct. 2680 (Cat. 4.13) COE Trans
(815)	Acct. 2680 (2410) Total CWF
(820)	Acct. 2680 (2410) CWF-Cat 1
(830)	Acct. 6560 (2680) Dep & Amort
	Control Total



**CONFIDENTIAL**  
**EXHIBIT D**

CenturyLink 2015 Planned Investments  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink (Washington)

NARRATIVE	BUDGET	PLAN START DATE	PLAN END DATE
[REDACTED]			

In addition to investment estimates listed above, Carrier anticipates annual operating expenses to exceed the amount of Universal Service Funds received.

REDACTED







[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**CONFIDENTIAL**  
**EXHIBIT E**

CenturyLink 2014 Planned Investments Progress Report  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	INITIATIVE	MNEMONIC	VERB	STATUS
[REDACTED]				

REDACTED

CenturyLink 2014 Planned Investments Progress Report  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	INITIATIVE	MNEMONIC	VERB	STATUS
[REDACTED]				

REDACTED

CenturyLink 2014 Planned Investments Progress Report  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	INITIATIVE	MNEMONIC	VERB	STATUS
[REDACTED]				

REDACTED

CenturyLink 2014 Planned Investments Progress Report  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	INITIATIVE	MNEMONIC	VERB	STATUS
[REDACTED]				

REDACTED



CenturyLink 2014 Planned Investments Progress Report  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	INITIATIVE	MNEMONIC	VERB	STATUS
[REDACTED]				

REDACTED

CenturyLink 2014 Planned Investments Progress Report  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	INITIATIVE	MNEMONIC	VERB	STATUS
[REDACTED]				

REDACTED

CenturyLink 2014 Planned Investments Progress Report  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	INITIATIVE	MNEMONIC	VERB	STATUS
[REDACTED]				

REDACTED

CenturyLink 2014 Planned Investments Progress Report  
WAC 480-123-080 (1)  
United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	INITIATIVE	MNEMONIC	VERB	STATUS
[REDACTED]				

REDACTED