

UT-101291-CT Om 9-30-10 Regular Agenda

100 CenturyLink Drive Monroe, LA 71203 Tel: 318.388.9000

July 29, 2010

Mr. David Danner Executive Director & Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, Washington 98504

Re: Certification as to Bundled Services in Compliance with RCW 80.36.332 and UTC Order 1 in Docket UT-071964 for CenturyTel of Cowiche, Inc. dba CenturyLink

Dear Mr. Danner:

Pursuant to UTC Order 1 in Docket UT-071575, CenturyTel of Cowiche, Inc. dba CenturyLink ("Company") hereby submits its annual certification as to bundled services.

Should you have any questions, please contact Mary Taylor at (360) 943-6996 or myself at (318) 362-1246.

Sincerely,

Amy Young

Regulatory Analyst

CenturyLink

**Enclosures** 

010 JUL 30 AM 8:01

#### CERTIFICATION AS TO BUNDLED SERVICES

I, Jeffrey S. Glover, am an officer for CenturyTel of Cowiche, Inc. dba CenturyLink (the "Company") and hereby certify (or declare) under penalty of perjury under the laws of the State of Washington that as of the date of execution of this document, to the best of my knowledge, information, and belief the Company's packages or bundles of telecommunications services that are offered on a minimally regulated basis comply with RCW 80.36.332 and comply with UTC Order 01 in Docket UT-071964.

The foregoing is true and correct:

Dated this 22NOday of July, 2010

Company: CenturyTel of Cowiche dba CenturyLink

By: Jeffrey Chower Louis

Vice President of Regulatory Operations and Policy

Subscribed to and sworn before me this 22 day of July, 2010 in Monroe, Louisiana.

Notary Public

#17193

Printed Name of Notary

My Commission Expires: FOR LIFE



100 CenturyLink Drive Monroe, LA 71203 Tel: 318.388.9000

July 29, 2010

Mr. David Danner Executive Director & Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, Washington 98504

Re: Request for Certification Pursuant to WAC 480-123-060 and 47 C.F.R. §54.314, and Claim of confidentiality.

Dear Mr. Danner:

Pursuant to WAC 480-123-060, CenturyTel of Cowiche, Inc. dba CenturyLink ("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 "CenturyLink 2010 Planned Investments" and "CenturyLink 2009 Planned Investments Progress Report" be treated as confidential. The schedule contains information that is quite detailed as to type of equipment, location and cost. Therefore, the Company claims that the information on the schedule is confidential under RCW 80.04.095 and WAC 480-07-160 in that it constitutes valuable commercial information in the form of network configuration and design information.

Should you have any questions, please contact Mary Taylor at (360) 943-6996 or myself at (318) 362-1246.

Sincerely,

Amy Young

Regulatory Analyst

CenturyLink

**Enclosures** 

2010 JUL 30 AM 8: 04

# REPORT AS REQUIRED BY WAC 480-123-060, WAC 480-123-070, AND WAC 480-123-080 CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK

CenturyTel of Cowiche, Inc. dba CenturyLink (the "Company") hereby submits the following report in accordance with WAC 480-123-060, WAC 480-123-070, and WAC 480-123-080.

WAC 480-123-070(1)(a): Attached is a copy of the Company's preliminary NECA-1 Report for the calendar year 2009. The final report will be submitted to NECA by the August 2, 2010 due date. The plant investment and expense amounts listed on NECA-1 represent the basis for federal high cost funding support associated with the Company's operations in 2009.

WAC 480-123-070(1)(b): The Company reports that the investment in plant and the expenses reported on the 2009 NECA-1 report 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 gives 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 NECA-1 report 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 the Company's NECA-1 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. For example, projects that added fiber 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.

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.

### Local Service Outage Report per WAC 480-123-070 (2):

The Company is exempt from this requirement as it is subject to WAC 480-120-412 and WAC 480-120-439(5).

<sup>&</sup>lt;sup>1</sup> The NECA-1 report does not identify expenditures at the project level. The projects underlying the expenditures on NECA-1 would tend to be very similar to those identified in response to WAC 480-123-080 (1) (b) which does identify certain planned expenditures at the project level.

Report on Failure to Provide Service per WAC 480-123-070 (3): The Company is exempt from this requirement as it is subject to WAC 480-120-439(5).

Report on Complaints per One Thousand Handsets of Lines per WAC 480-123-070(4): The Company reports that there were 0.06% complaints per thousand access lines during calendar year 2009 to the Federal Communications Commission or to the Consumer Protection Division of the Office of the Attorney General of the State of Washington concerning the services provided to its customers.

Company had 1 complaint to the office of Attorney General. The complaint was as follows:

1 - DSL

WAC 480-123-080(1)(b): The Company submits herewith a schedule entitled "CenturyLink 2010 Planned Investments." 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 2010. The schedule 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 the 2009 NECA-1 form submitted in response to WAC 480-123-070(1)(a). The Company also submits the schedule entitled "CenturyLink 2009 Planned Investments Progress Report". The schedule describes the status of construction projects during 2009 and is being submitted as a CONFIDENTIAL document under WAC 480-07-160 and RCW 80.04.095.

WAC 480-123-080(2): 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 on the CenturyLink 2010 Planned Investment schedule as well as expenses at a level similar to that indicated on the 2009 NECA-1 form 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 CenturyLink 2010 Planned Investments

<sup>&</sup>lt;sup>2</sup> The schedule includes projects for CenturyTel of Washington, Inc., CenturyTel of Inter-Island, Inc., CenturyTel of Cowiche, Inc., and United Telephone of the Northwest.

schedule that is entitled "Narrative." The narrative for each project on the schedule identifies specific improvements that will benefit consumers in specific areas.

COMPANY	Budget	Estimated Estimate Start Date	d End Date Narrative	
				-

		Estimated	Estimated End	
COMPANY	Budget	Start Date	Estimated End Date	Narrative



#### USF1010 ERROR REPORT



Applies to Period: Year End 12/2009 2 SOUTHERN Subset 2 Reg: Donnie Aultman Contact Name: MSM: 000021047 Marilyn Stewart Contact Phone: (318)-388-9497 Ext: 00: 200000016 CenturyTel, Inc. dba CenturyLink Release Status: Not Released 300000440 Co: CenturyTel, Inc. dba CenturyLink Soft Edit Status: Failed Edit SAR. 522410 CENTURYTEL-COWICHE

Soft E	dit Status:	Failed Edit		SAR:	522410	CE
Descr	iption			Pending	g View	Message
060	Total Loops				1,849	•
070	Cat. 1.3 Loops				1,828	
160	Account 2001	Account 2001		7,775,574		
170	Account 1220				0	
190	Account 3100			6,31	15,611	
195	Account 3400				0	
210	Account 4340			84,020		
220	Net Plant Inves	tment		1,375,943		
230	Account 2210			2,163,862		
235	Account 2220				0	
240	Account 2230			96	96,952	
245	Total Central O	ffice		3,16	30,814	
250	Ckt Equip Cat 4	l.13		48	36,133	
255	Account 2410			4,04	18,948	
260	Account 3100 (	2210)		2,05	6,130	
265	Account 3100 (	2220)			0	
270	Account 3100 (	2230)		71	17,839	
275	Account 3100 (	2210-2230)		2,77	73,969	
280	Account 3100 (	2410)		3,11	19,130	
310	Account 4340 (2210)				23,382	
315	Account 4340 (	2220)			0	
320	Account 4340 (2230)			1	10,773	
325	Account 4340 (	2210-2230)		3	4,155	
330	Account 4340 (	2410)		4	3,751	
335	Account 6110 7	otal			2,863	
340	Account 6110 E	Benefits			431	
345	Account 6110 F	Rents			35	
350	Account 6120 T	otal		3	31,220	
355	Account 6120 E	Benefits			1,552	
360	Account 6120 F	Rents			2,914	
365	Account 6210 T	otal		9	5,828	
370	Account 6210 E	Benefits		2	2,123	
375	Account 6210 F	Rents			111	
380	Account 6220 T	otal			0	
385	Account 6220 E	Benefits			0	
390	Account 6220 F	Rents			0	
395	Account 6230 T	otal		2	1,317	
400	Account 6230 E	Benefits			73	
405	Account 6230 F	Rents			0	
410	Account 6210-6	230		11	7,145	
430	Account 6410 T	otal		10	9,510	
435	Account 6410 E	Benefits		2	1,037	
440	Account 6410 F	Rents		2	6,790	
445	Total Plant Spe	cific			0,738	
450	Account 6530 T	otal			9,847	
455	Account 6530 E	Benefits			0,366	
510	Account 6560 (	2210)			2,723	
515	Account 6560 (	2220)			0	
520	Account 6560 (	2230)		3	4,771	
	•		•	-		



## USF1010 ERROR REPORT

7/20/2010 3:30:39 pm Page 2 of 2

Applies to Period: Contact Name: Contact Phone: Release Status: Soft Edit Status:	Year End 12/2009 Donnie Aultman (318)-388-9497 Ext: Not Released Failed Edit	Reg: MSM: OO: Co: SAR:	2 000021047 200000016 300000440 522410	SOUTHERN Marilyn Stewart CenturyTel, Inc. dba CenturyLin CenturyTel, Inc. dba CenturyLin CENTURYTEL-COWICHE		2
Description		Pending	g View Mess	age		
525 Account 6560 (2210 530 Account 6560 (2410 535 Account 6710 Total 540 Account 6710 Bene 550 Account 6720 Total 555 Account 6720 Bene 565 Sum of Lines 535 + 600 Ben. Por. of all Op. 610 Rent Por. of all Op. 610 Account 7200 Other 700 2410 (C S Total CW 710 2410 (C S CWF - C 800 Account 2680 Total 805 Account 2680 (2230 810 Account 2680 (2410) To 820 Acc 2680 (2410) CW 830 Account 6560 (2680 Control Total:	orifits  fits  550  Exp.  Exp.  r Taxes  VF - AV)  fat.1)  0)  4.13)  otal CWF	20 3 1 11 12 11 2 19 4,10 4,0	17,494 08,895 30,405 18,912 17,529 16,386 17,934 11,754 29,850 93,846 05,067 13,024 0 0 0 0		•	

Comments:

# AFFIDAVIT CONTAINING CERTIFICATIONS AS REOUIRED BY WAC 480-123-060 AND WAC 480-123-070

I, Jeffrey Glover, being of lawful age and duly sworn, on my oath state that I am Vice President of Regulatory Operations and Policy for CenturyTel of Cowiche, Inc. dba CenturyLink ("Company"), that I am authorized to execute this Affidavit on behalf of the Company, and that the facts set forth in this Affidavit 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 the federal high-cost universal service fund support received by the Company will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2009 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2009 calendar year, the Company maintained 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 wireline carriers in emergency situations; and
- (4) That during the 2009 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian Reservations 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 2010 Moday of July, 2010

Company: CenturyTel of Cowiche, Inc. dba CenturyLink

Vice President of Regulatory Operations and Policy

Subscribed to and sworn before me this 2200 day of July, 2010 in Monroe, Louisiana.

Notary Public

Printed Name of Notary

My Commission Expires: FOR LIFE