

CenturyLink  
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Denver, Colorado 80202  
303-992-5832



May 18, 2018

Steven King  
Executive Director and Secretary  
1300 S. Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, Washington 98504-7250

Re: Advice No. WA 18-02A for United Telephone Company of the Northwest

Dear Mr. King:

United Telephone of the Northwest d/b/a CenturyLink is forwarding for filing the sheets listed on Attachment A.

This filing is the seventh step in implementing the Terminating Switched End Office Access Service reductions mandated in the Federal Communications Commission's November 18, 2011 Report and Order and Further Notice of Proposed Rulemaking in WC Docket Nos. 10-90, etc. (FCC 11-161) (Transformation Order). When a CenturyLink Price Cap ILEC owns the tandem and a CenturyLink Price Cap ILEC or affiliate owns the terminating End Office Switch, the tandem switched rates will be considered "Tandem-to-End Office" and will transition to bill-and-keep (not to exceed \$0.0000/MOU) as required by 47 C.F.R. §51.907(h), which addresses changes beginning July 1, 2018. All other tandem traffic that traverses a CenturyLink Price Cap ILEC-owned tandem and does not terminate to an end user served by a CenturyLink Price Cap ILEC end office will be considered "Tandem-to-3rd Party" and will continue to be billed at the current Interstate rates, including tandem traffic traversing a CenturyLink Price-Cap ILEC-owned tandem to an affiliated CenturyLink CLEC end office. Tandem-Switched Transport charges associated with traffic traversing a non-CenturyLink Price Cap ILEC-owned tandem, but terminating to a CenturyLink-owned end office will also remain at current Interstate rates.

On April 5, 2018, the FCC released an order (WC Docket No. 18-100 DA 18-355) granting a limited waiver of the July 1 effective date for the 2018 annual access filings specifically including §51.907(h) and setting July 3, 2018 as the effective date for the 2018 rate changes required by its Transformation Order. The intrastate rate changes proposed under this filing mirror the effective date of the interstate rate changes.

Also enclosed is CenturyLink's certification that the company is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism established by the Transformation Order.

CenturyLink QC respectfully requests that this proposed change become effective July 3, 2018.

Sincerely,

A handwritten signature in blue ink that reads "Mark Brinton".

Mark Brinton  
Manager Regulatory Operations  
Office: (303) 992-5832  
e-mail: [Mark.Brinton@CenturyLink.com](mailto:Mark.Brinton@CenturyLink.com)

Attachment A

Received  
Records Management  
05/18/18 10:43  
State Of WASH  
UTIL. AND TRANSP.  
COMMISSION

**ACCESS SERVICE**  
Tariff WN U-11

**SECTION**  
6

**SHEET**  
6-136.2

**REVISION**  
1st