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Mark S. Reynolds
Northwest Region Vice President
Public Policy



October 10, 2013

Via Overnight delivery

Mr. Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

**Re: CenturyLink's Comments Regarding Amending and Adopting
Rules in WAC 480-120, Telephone Companies, and WAC 480-123,
Universal Service, to Implement Legislation Establishing a State
Universal Communications Service Program; Docket UT-131239**

Dear Mr. King:

On September 26, 2013 the Commission issued a notice of opportunity to file written comments in conjunction with the implementation of 2E2SHB 1971 regarding the establishment of a state universal communication service program in Docket UT-131239. Accordingly, CenturyLink provides the following comments regarding two of the specific questions raised by the Commission in the notice.

- Which specific intrastate switched access charge rate elements currently assessed by Washington carriers and administered by the Washington Exchange Carrier Association (WECA) should be abolished concurrently with initiation of program funding to eligible carriers?
- Should the Commission abolish the WECA support fund through these rules or by order in a separate docket?

CenturyLink Comments

Certain CenturyLink operating companies currently receive distributions from the WECA "Traditional USF" access pool. By the terms of 2E2SHB 1971, CenturyLink does not meet the parameters for USF distributions from the USF program the Commission will establish to implement the legislation. Also, 2E2SHB 1971 does not mandate the elimination of the WECA fund. Consequently, CenturyLink recommends that the Commission deliberate on the fate of the WECA fund in a separate docket.

Sincerely,

A handwritten signature in black ink that reads "Mark S. Reynolds" with a stylized flourish at the end.

Mark S. Reynolds
MSR/jga

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