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**Philip E. Grate**  
State Regulatory Affairs Director  
Public Policy

June 27, 2019



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State of WASH.  
UTIL. AND TRANSP.  
COMMISSION

*Via Web Portal*

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

**RE: CenturyLink 2019 Federal ETC Filing  
Qwest Corporation dba CenturyLink QC**

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 1<sup>st</sup> of each year.

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.

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, filing of the FCC Form 481 has changed 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 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.

Consistent with past years, we request that you certify to the FCC pursuant to 47 C.F.R § 54.314 by October 1, 2019 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,

A handwritten signature in black ink that reads "Philip E. Grate". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Philip E. Grate

PEG/jga