

100 CenturyLink Drive
Monroe, LA 71203
Tel: 318.388.9000



July 28, 2011

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

Re: 2011 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. Danner:

Pursuant to WAC 480-123-060, CenturyTel of Washington, Inc. and CenturyTel of Inter-Island, Inc. d/b/a 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 2011 Planned Investments" and "CenturyLink 2010 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 Mark Reynolds at (206) 345-1568 or myself at (318) 362-1246.

Sincerely,

Amy Young
Regulatory Analyst
CenturyLink

Enclosures

**REPORT AS REQUIRED BY WAC 480-123-060, WAC 480-123-070,
AND WAC 480-123-080
CENTURYTEL OF WASHINGTON, INC. D/B/A CENTURYLINK AND
CENTURYTEL OF INTER-ISLAND, INC. D/B/A CENTURYLINK**

CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a 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 2010. The final report will be submitted to NECA by the July 31, 2011 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 2010.

WAC 480-123-070(1)(b): The Company reports that the investment in plant and the expenses reported on the preliminary 2010 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 preliminary 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 preliminary 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.¹ 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.

¹ 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.

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).

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 0.24 complaints per thousand access lines during calendar year 2010 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 12 complaints to the FCC. The complaints were as follows:

- 3 – DSL/High Speed Internet
- 2 – Dish Network/Direct TV
- 1 – Long Distance, explained policy for data calls using Long Distance Plans.
- 3 – Disputed Charges, resolved by explanation of charges or crediting accounts.
- 1 – Other Carrier, resolved by helping with number port.
- 2 – Service issues, resolved by explanation or provision of service.

Company had 19 complaints to the office of Attorney General. The complaints were as follows:

- 7 – DSL/High Speed Internet
- 4 – Dish Network/Direct TV
- 1 – Other Carrier, customer dismissed complaint regarding number port to other carrier.
- 5 – Disputed Charges, resolved by explanation of charges or crediting accounts.
- 2 – Long Distance, explained policy for conference calls and international calls using Unlimited Long Distance Plans.

WAC 480-123-080(1)(b): The Company submits herewith a schedule entitled “CenturyLink 2011 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 2011. 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 preliminary 2010 NECA-1 form submitted in response to WAC 480-123-070(1)(a). The Company also submits the schedule entitled “CenturyLink 2010 Planned Investments Progress Report”. The schedule describes the status of construction projects during 2010 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 2011 Planned Investments schedule as well as expenses at a level similar to that indicated on the preliminary 2010 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 2011 Planned Investments schedule that is entitled "Narrative." The narrative for each project on the schedule identifies specific improvements that will benefit consumers in specific areas.

**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 Senior Vice President and Controller for CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. 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 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 2010 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);

(3) That during the 2010 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 wire line carriers in emergency situations; and

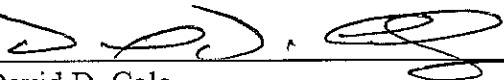
(4) That during the 2010 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian Reservations and in a manner which, in the Company’s 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.

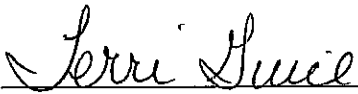
Dated this 27th day of July, 2011

Company: CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a CenturyLink

By: 
David D. Cole

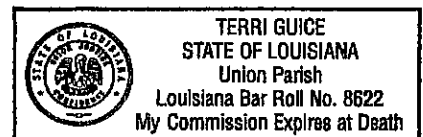
Senior Vice President and Controller

Subscribed to and sworn before me this 27th day of July, 2011 in Monroe, Louisiana.


Notary Public

TERRI Guice
Printed Name of Notary

My Commission Expires: At death



CenturyLink 2011 Planned Investments

WAC 480-123-080 (1)(B)

CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a CenturyLink

NARRATIVE	Budget	PLAN START DATE	PLAN END DATE
[Redacted Content]			

Redacted

CenturyLink 2011 Planned Investments

WAC 480-123-080 (1)(B)

CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a CenturyLink

NARRATIVE	Budget	PLAN START DATE	PLAN END DATE
[Redacted Content]			

Redacted

CenturyLink 2011 Planned Investments

WAC 480-123-080 (1)(B)

CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a CenturyLink

NARRATIVE	Budget	PLAN START DATE	PLAN END DATE
[Redacted Content]			

Redacted

CenturyLink 2011 Planned Investments

WAC 480-123-080 (1)(B)

CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a CenturyLink

NARRATIVE	Budget	PLAN START DATE	PLAN END DATE
[Redacted Content]			

Redacted

CenturyLink 2011 Planned Investments

WAC 480-123-080 (1)(B)

CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a CenturyLink

NARRATIVE	Budget	PLAN START DATE	PLAN END DATE
[Redacted Content]			

Redacted

CenturyLink 2011 Planned Investments

WAC 480-123-080 (1)(B)

CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a CenturyLink

NARRATIVE	Budget	PLAN START DATE	PLAN END DATE
[Redacted Content]			

Redacted

CenturyLink 2011 Planned Investments

WAC 480-123-080 (1)(B)

CenturyTel of Washington, Inc. d/b/a CenturyLink and CenturyTel of Inter-Island, Inc. d/b/a CenturyLink

NARRATIVE	Budget	PLAN START DATE	PLAN END DATE
[Redacted Content]			

Redacted



USF1010 ERROR REPORT

7/1/2011
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Page 1 of 2

Applies to Period: Year End 12/2010
Contact Name: Donnie Aultman
Contact Phone: (318)-388-9497 Ext:
Release Status: Not Released
Soft Edit Status: Passed Edit

Reg: 2 SOUTHERN
MSM: 000021047 Marilyn Stewart
OO: 200000016 CenturyTel, Inc. dba CenturyLink
Co: 300000440 CenturyTel, Inc. dba CenturyLink
SAR: 522408 CENTURYTEL-WASHINGTO

Subset 2

Description	Pending View	Message
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070 Cat. 1.3 Loops	124,102	
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170 Account 1220	9,415	
190 Account 3100	441,969,696	
195 Account 3400	0	
210 Account 4340	41,764,378	
220 Net Plant Investment	169,892,920	
230 Account 2210	92,362,512	
235 Account 2220	0	
240 Account 2230	153,521,107	
245 Total Central Office	245,883,619	
250 Ckt Equip Cat 4.13	92,505,625	
255 Account 2410	377,165,713	
260 Account 3100 (2210)	65,209,407	
265 Account 3100 (2220)	0	
270 Account 3100 (2230)	117,488,248	
275 Account 3100 (2210-2230)	182,697,655	
280 Account 3100 (2410)	244,731,175	
310 Account 4340 (2210)	5,901,712	
315 Account 4340 (2220)	0	
320 Account 4340 (2230)	9,809,579	
325 Account 4340 (2210-2230)	15,711,291	
330 Account 4340 (2410)	24,099,859	
335 Account 6110 Total	116,145	
340 Account 6110 Benefits	14,942	
345 Account 6110 Rents	1,237	
350 Account 6120 Total	2,399,742	
355 Account 6120 Benefits	112,892	
360 Account 6120 Rents	426,273	
365 Account 6210 Total	5,112,371	
370 Account 6210 Benefits	1,245,988	
375 Account 6210 Rents	37,247	
380 Account 6220 Total	0	
385 Account 6220 Benefits	0	
390 Account 6220 Rents	0	
395 Account 6230 Total	2,161,891	
400 Account 6230 Benefits	386,005	
405 Account 6230 Rents	51,460	
410 Account 6210-6230	7,274,262	
430 Account 6410 Total	15,150,997	
435 Account 6410 Benefits	3,131,317	
440 Account 6410 Rents	2,251,196	
445 Total Plant Specific	24,941,146	
450 Account 6530 Total	6,682,127	
455 Account 6530 Benefits	904,585	
510 Account 6560 (2210)	5,162,571	
515 Account 6560 (2220)	0	
520 Account 6560 (2230)	5,373,747	



USF1010 ERROR REPORT

7/1/2011
12:05:32 pm
Page 2 of 2

Applies to Period: Year End 12/2010
Contact Name: Donnie Aultman
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Release Status: Not Released
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Reg: 2 SOUTHERN
MSM: 000021047 Marilyn Stewart
OO: 200000016 CenturyTel, Inc. dba CenturyLink
Co: 300000440 CenturyTel, Inc. dba CenturyLink
SAR: 522408 CENTURYTEL-WASHINGTO

Subset 2

Description	Pending View	Message
525 Account 6560 (2210-2230)	10,536,318	
530 Account 6560 (2410)	15,840,060	
535 Account 6710 Total	769,994	
540 Account 6710 Benefits	128,046	
550 Account 6720 Total	10,799,818	
555 Account 6720 Benefits	894,064	
565 Sum of Lines 535 + 550	11,569,812	
600 Ben. Por. of all Op. Exp.	8,524,490	
610 Rent Por. of all Op. Exp.	2,767,413	
650 Account 7200 Other Taxes	9,905,273	
700 2410 (C S Total CWF - AV)	368,971,915	
710 2410 (C S CWF - Cat.1)	359,309,979	
800 Account 2680 Total	0	
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	
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Comments: