

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 Compliance with WAC 480-123-070 and WAC 480-123-080

Dear Mr. Danner:

United Telephone Company of the Northwest d/b/a CenturyLink ("Company") hereby submits certifications and reports that are specified in WAC 480-123-070 and WAC 480-123-080, 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 480-123-070,  
AND WAC 480-123-080  
UNITED TELEPHONE COMPANY OF THE NORTHWEST D/B/A  
CENTURYLINK**

United Telephone Company of the Northwest d/b/a CenturyLink (the "Company") hereby submits the following report in accordance with 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 preliminary 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.<sup>1</sup> 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.

---

<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.

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 0.15 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 4 complaints to the FCC. The complaints were as follows:

- 1 – Service Issue, resolved by explanation or provision of service.
- 3 – Disputed Charges, resolved by explanation of charges or crediting accounts.

Company had 5 complaints to the office of Attorney General. The complaints were as follows:

- 1 – DSL/High Speed Internet
- 2 - Long Distance Charges, resolved by explanation of charges or crediting accounts.
- 2 – Disputed Charges third party charges, resolved by explanation of charges, referral to third party vendors, or crediting accounts.

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 480-123-070**

I, David D. Cole, being of lawful age and duly sworn, on my oath state that I am Senior Vice President and Controller for United Telephone Company of the Northwest 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

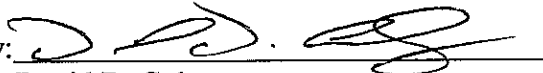
(4) That during the 2010 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian Reservations and in a manner which, in the Company's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

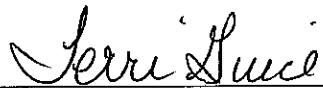
Dated this 27<sup>th</sup> day of July, 2011

Company: United Telephone Company of the Northwest d/b/a CenturyLink

By:   
David D. Cole

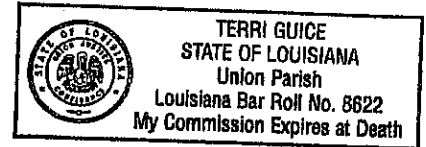
Senior Vice President and Controller

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

  
Notary Public

TERRI Guice  
Printed Name of Notary

My Commission Expires: At death

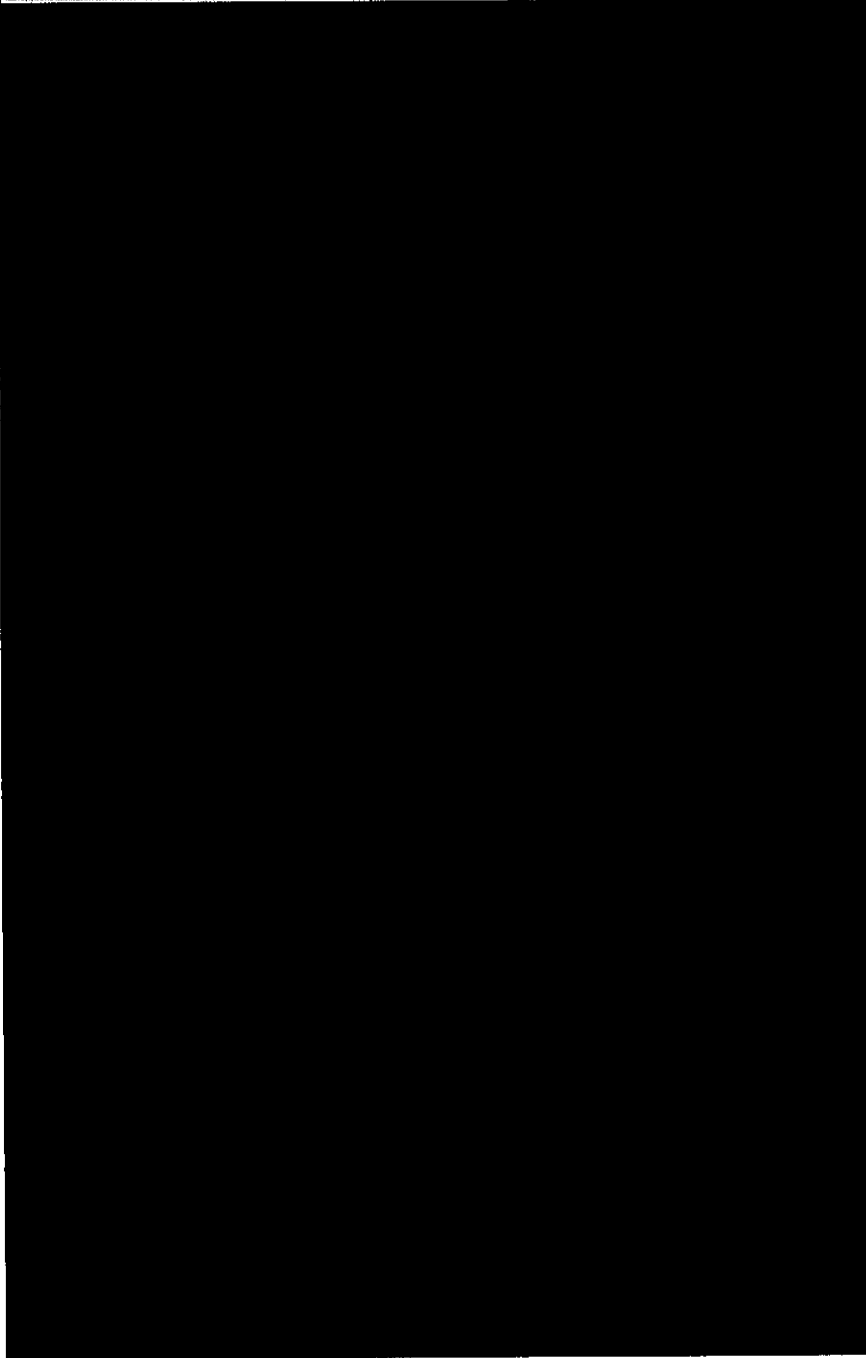


CenturyLink 2011 Planned Investments

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

United Telephone Company of the Northwest d/b/a CenturyLink

NARRATIVE	Budget	PLAN START DATE	PLAN END DATE
-----------	--------	--------------------	------------------



Redacted

CenturyLink 2011 Planned Investments  
WAC 480-123-080 (1)(B)  
United Telephone Company of the Northwest 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)  
United Telephone Company of the Northwest 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)  
United Telephone Company of the Northwest 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)  
United Telephone Company of the Northwest 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)

United Telephone Company of the Northwest 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)  
United Telephone Company of the Northwest d/b/a CenturyLink


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

Redacted

CenturyLink 2010 Planned Investments Progress Report  
WAC 480-123-080 (1)(B)  
United Telephone Company of the Northwest d/b/a CenturyLink

In 2010, United Telephone Company of the Northwest d/b/a CenturyLink complete projects as follows:

(000's)

Constant Projects	
Copper	
Engineering	
Fiber/Fiber Optic	
Land/Building	
New Features	
Switching	
Transmission/DLC	
<b>Total</b>	

Redacted



USF1010 ERROR REPORT

7/1/2011  
12:05:27 pm  
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  
MSM: 000021047  
OO: 200000016  
Co: 200000012  
SAR: 522400

SOUTHERN  
Marilyn Stewart  
CenturyTel, Inc. dba CenturyLink  
Embarq Corporation dba CenturyLink  
UTC OF THE NW-WA

Subset 2

Description	Pending View	Message
060 Total Loops	61,981	
070 Cat. 1.3 Loops	57,069	
160 Account 2001	266,468,093	
170 Account 1220	14,749	
190 Account 3100	199,958,605	
195 Account 3400	109,744	
210 Account 4340	1,794,183	
220 Net Plant Investment	64,620,310	
230 Account 2210	45,752,046	
235 Account 2220	0	
240 Account 2230	65,972,820	
245 Total Central Office	111,724,866	
250 Ckt Equip Cat 4.13	25,886,652	
255 Account 2410	142,041,949	
260 Account 3100 (2210)	45,145,957	
265 Account 3100 (2220)	0	
270 Account 3100 (2230)	44,779,208	
275 Account 3100 (2210-2230)	89,925,165	
280 Account 3100 (2410)	105,339,561	
310 Account 4340 (2210)	308,058	
315 Account 4340 (2220)	0	
320 Account 4340 (2230)	444,208	
325 Account 4340 (2210-2230)	752,266	
330 Account 4340 (2410)	956,397	
335 Account 6110 Total	39,987	
340 Account 6110 Benefits	3,648	
345 Account 6110 Rents	130	
350 Account 6120 Total	1,011,951	
355 Account 6120 Benefits	47,187	
360 Account 6120 Rents	187,060	
365 Account 6210 Total	1,385,301	
370 Account 6210 Benefits	205,977	
375 Account 6210 Rents	3,411	
380 Account 6220 Total	0	
385 Account 6220 Benefits	0	
390 Account 6220 Rents	0	
395 Account 6230 Total	659,730	
400 Account 6230 Benefits	115,362	
405 Account 6230 Rents	1,218	
410 Account 6210-6230	2,045,031	
430 Account 6410 Total	4,975,519	
435 Account 6410 Benefits	738,021	
440 Account 6410 Rents	958,430	
445 Total Plant Specific	8,072,488	
450 Account 6530 Total	2,890,242	
455 Account 6530 Benefits	313,906	
510 Account 6560 (2210)	1,766,854	
515 Account 6560 (2220)	0	
520 Account 6560 (2230)	4,479,282	



USF1010 ERROR REPORT

7/1/2011  
12:05:27 pm  
Page 2 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 Subset 2  
MSM: 000021047 Marilyn Stewart  
OO: 200000016 CenturyTel, Inc. dba CenturyLink  
Co: 200000012 Embarq Corporation dba CenturyLink  
SAR: 522400 UTC OF THE NW-WA

Description	Pending View	Message
525 Account 6560 (2210-2230)	6,246,136	
530 Account 6560 (2410)	5,263,452	
535 Account 6710 Total	352,077	
540 Account 6710 Benefits	88,196	
550 Account 6720 Total	4,338,699	
555 Account 6720 Benefits	598,991	
565 Sum of Lines 535 + 550	4,690,776	
600 Ben. Por. of all Op. Exp.	2,776,450	
610 Rent Por. of all Op. Exp.	1,150,249	
650 Account 7200 Other Taxes	5,287,738	
700 2410 (C S Total CWF - AV)	139,536,484	
710 2410 (C S CWF - Cat.1)	129,336,152	
800 Account 2680 Total	124,139	
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	
Control Total:	1,541,804,161	

Comments: