

CENTURYLINK
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Seattle, Washington 98191
(206) 345-1568
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Mark S. Reynolds
Director, Western Region
Regulatory Affairs



July 27, 2011

Via web portal and
Overnight Mail

Mr. David Danner
Secretary and Executive Director
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: 2011 ETC Certification: Qwest's 2010 ETC Certification Report and Plan
for Universal Service Support Expenditures in Accordance with WAC 480-
123-070 and WAC 480-123-080

Dear Mr. Danner,

In response to the requirements of WAC 480-123-070 Annual Certifications and Reports
and WAC 480-123-080 Annual Plan for Universal Service Support Expenditures, Qwest
provides the following information. For ease of reading, Qwest will list each of the
requirements under the rules followed by its response.

WAC 480-123-070 Annual Certifications and Reports Not later than July 31 of each
year, every ETC that receives federal support from any category in the federal high-cost
fund must certify or report as described in this section. The certifications and reports are
for activity related to Washington State in the period January 1 through December 31 of
the previous year. A company officer must submit the certifications in the manner
required by RCW 9A.72.085.

Response: The declarations of Qwest officers certifying the data contained in
this filing are in Attachments A1, A2, and A3.

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Confidential per WAC 480-07-160

(1) Report on use of federal funds and benefits to customers.

(a) For an ETC that receives support based only on factors other than the ETC's investment and expenses, the report must provide a substantive description of investments made and expenses paid with support from the federal high-cost fund.

For ETCs that receive any support based on the ETC's investment and expenses, the report must provide a substantive description of investment and expenses, such as the NECA-1 report, the ETC will report as the basis for support from the federal high-cost fund.

Response: In accordance with FCC Docket No. 96-45, Qwest received \$2,585,038 of Interstate Access Support ("IAS") for the state of Washington in calendar year 2010. Although Qwest does not specifically track IAS support to particular construction and maintenance projects, it does certify that the IAS funds were used only for the provision, maintenance and upgrading of facilities and services for which the support was intended (See Attachment A1). Qwest's actual expenditures during the certification period for the provision maintenance and upgrading of facilities and services in designated support areas significantly exceeded the \$2,585,038 in IAS support received. Attachment B is a list of the wire centers on which Qwest's IAS support is based.

Qwest's 2010 investments in its wire centers upon which its IAS support is calculated (See Attachment B to Qwest ETC Report), was ***REDACTED***. Qwest's 2010 investments for all other wire centers was ***REDACTED***. Qwest's investment expenditures through April 30, 2011 in its wire centers upon which its IAS support is calculated total ***REDACTED***. Investments in all other wire centers totaled ***REDACTED*** as of the same date. These amounts do not include expenses paid in rural or non-rural areas because Qwest does not track those costs below the state level. It can be safely stated that rural areas incur at least as much maintenance expense, per line, as non-rural areas. Total network maintenance expenses (total cost of service excluding access expense) in Washington for 2010 were ***REDACTED*** and through April 30, 2011 were ***REDACTED***.

A copy of the NECA form that Qwest Corporation files with National Exchange Carrier Association (NECA) in 2011 pursuant to 47 C.F. R. § 36.611 (data as of December 31st of the calendar year 2010 is attached as Attachment C .

(b) Every ETC must provide a substantive description of the benefits to consumers that resulted from the investments and expenses reported pursuant to (a) of this subsection.

Response: Through the expenditure of IAS funds, Qwest was able to continue to provide services at a level that meets the requirements of 47 U.S.C. §254 of providing high quality telecommunication services to customers in the service

REDACTED

areas for which it receives IAS support. Qwest has made substantial investments over the past several years that allow it to provide quality telecommunication service to its customers in the designated support areas.

(2) Local service outage report. ETCs not subject to WAC 480-120-412 and 480-120-439(5) are required to report local service outages pursuant to this subsection. The report must include detailed information on every local service outage thirty minutes or longer in duration experienced by the ETC. The report must include:

- (a) The date and time of onset and duration of the outage;
- (b) A brief description of the outage and its resolution;
- (c) The particular services affected, including whether a public safety answering point (PSAP) was affected;
- (d) The geographic areas affected by the outage;
- (e) Steps taken to prevent a similar situation in the future; and
- (f) The estimated number of customers affected.

Response: Qwest is exempt from this requirements as it is subject to WACs 480-120-412 and 480-120-439(5).

(3) Report on failure to provide service. ETCs not subject to WAC 480-120-439 are required to report failures to provide service pursuant to this subsection. The report must include detailed information on the number of requests for service from applicants within its designated service areas that were unfulfilled for the reporting period. The ETC must also describe in detail how it attempted to provide service to those applicants.

Response: Qwest is exempt from this requirements as it is subject to WAC 480-120-439(5).

(4) Report on complaints per one thousand handsets or lines. The report must provide separate totals for the number of complaints that the ETC's customers made to the Federal Communications Commission, or the consumer protection division of the office of the attorney general of Washington. The report must also generally describe the nature of the complaints and outcome of the carrier's efforts to resolve the complaints.

Response: Attachment D provides Washington complaints to the FCC and to the Consumer protection division of the attorney general of Washington lines for the 2010 and 2011 year-to-date. The complaint categories include billing, call handling, commitment/interval, held order, installation, repair, treatment, and other.

Qwest's efforts to resolve complaints for all complaint categories are based on the following process:

- Review the complaint to determine the nature of the problem
- Review Qwest's records/data to substantiate the claim

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- Determine if Qwest's practices, which may have led to the complaint, are in accord with applicable statutes and rules
- If Qwest determines that its actions/practices that led to the complaint are in accord with applicable statutes and rules, it will provide substantiation for its claim to the investigating agency
- If Qwest determines that its actions/practices that led to the complaint are not in accord with applicable statutes and practices, it will attempt to resolve the problem (i.e., service credits, service repair, etc.)
- If Qwest determines that its actions/practices that led to the complaint are not in accord with applicable statutes and practices, and it is a systemic problem, it will notify the appropriate Qwest business/operation unit to take corrective action to fix the deficient or defective systems or processes.
- In any event, Qwest always works closely with the regulating agencies to quickly resolve customer's service-affecting issues.

Although Qwest does not track how each and every one of its complaints are resolved, the table below provides a breakdown of its 2010 complaints regarding whether the complaint was for an IAS supported service or for other services not supported by IAS funding.

Washington FCC Escalations

Subject	2010 - All		2010 -IAS Based	
	Number	Per 1,000 Lines	Number	Per 1,000 Lines
Billing	108	0.074	39	0.027
Call Handling	1	0.001	1	0.001
Commitment/Interval	1	0.001	1	0.001
Held Order	1	0.001	1	0.001
Installation	0	0.000	0	0.000
Repair	4	0.003	0	0.000
Treatment	2	0.001	2	0.001
Other	39	0.027	29	0.020
Total	156	0.106	73	0.050

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Washington Attorney General Escalations

Subject	2010 - All		2010 - IAS Based	
	Number	Per 1,000 Lines	Number	Per 1,000 Lines
Billing	223	0.152	85	0.058
Call Handling	5	0.003	5	0.003
Commitment/Interval	1	0.001	1	0.001
Held Order	0	0.000	0	0.000
Installation	1	0.001	1	0.001
Repair	31	0.021	3	0.002
Treatment	22	0.015	22	0.015
Other	113	0.077	26	0.018
Total	396	0.270	143	0.097

(5) **Certification of compliance with applicable service quality standards.** Certify that it met substantially the applicable service quality standard found in WAC 480-123-030 (1)(h).

Response: Qwest certifies that in 2010 it substantially met the applicable service quality standard found in WAC 480-123-030 (1)(h). Qwest's officer certification for this section is in Attachment A2.

(6) **Certification of ability to function in emergency situations.** Certify that it had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g).

Response: Qwest certifies that in 2010 it had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g). Qwest's officer certification for this section is in Attachment A2.

(7) **Advertising certification, including advertisement on Indian reservations.** Certify it has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the ETC's designated service area. Such publicity should include advertisements likely to reach those who are not current customers of the ETC within its designated service area.

Response: Qwest certifies that it has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within Qwest's designated service area. Such

REDACTED

publicity includes advertisements likely to reach those who are not current customers of Qwest within its designated service area. Qwest's officer certification for this section is in Attachment A3.

WAC 480-123-080 Annual plan for universal service support expenditures. (1) Not later than July 31 of each year, every ETC that receives federal support from any category in the federal high-cost fund must report on:

(a) The planned use of federal support related to Washington state that will be received during the period October 1 of the current year through the following September; or

(b) The planned investment and expenses related to Washington State which the ETC expects to use as the basis to request federal support from any category in the federal high-cost fund.

(2) The report must include a substantive plan of the investments and expenditures to be made with federal support and a substantive description of how those investments and expenditures will benefit customers.

Response: Qwest expects its IAS funding for the specified funding period to be consistent with its funding for the 2010/2011 funding period. Although Qwest does not specifically track IAS support to particular construction and maintenance projects, it does certify that the IAS support it will receive for the next funding period will be used only for the provision, maintenance and upgrading of facilities and services in the designated support areas. Qwest plans to continue to provide services at a level that meets the requirements of 47 U.S.C. §254 of providing high quality telecommunication services to customers in the service areas for which it receives IAS support. Qwest will continue to invest in the designated support areas in order to provide high quality telecommunication service to benefit its customers.

Qwest expects its level of IAS funding for the specified funding period to be consistent with its funding for the 2010/2011 funding period (Please see Qwest's response to Staff's inquiry on 480-123-070 (1) regarding current year expenditures).

Please feel free to contact me if you have any questions.

Sincerely,

Mark S. Reynolds

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**Interstate Access Support (IAS)
2011 - 2012**

IAS

Date 6/20/2011

To: Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Karen A. Majcher
Vice President, High Cost and Low Income
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Re: CC Docket No. 96-45
Interstate Access Support - IAS
Annual Certification Filing

This is to certify that Qwest Corporation
will use its **INTERSTATE ACCESS SUPPORT - IAS** only for the provision, maintenance
and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the
study area(s) listed below. **(Please enter your Company Name, State and Study Area Code)**

IAS		
Company Name	State	Study Area Code
Qwest Corporation	Arizona	455101
Qwest Corporation	Colorado	465102
Qwest Corporation	Montana	485104
Qwest Corporation	New Mexico	495105

(If necessary, attach a separate list of additional study areas and check this box.)

Signed,


[Signature of Authorized Representative]

Date: 6/20/2011

Patrick J. Halbach
[Printed Name of Authorized Representative]

Vice President & Assistant Controller
[Title of Authorized Representative]

Carrier's Name: Qwest Corporation
Carrier's Address: 1801 California St. Denver, CO 80202
Carrier's Telephone Number: (402) 422-7362

<p>_____</p> <p>Date Received (For official use only)</p>
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USAC

**Interstate Access Support (IAS)
2011 - 2012**

IAS		
Company Name	State	Study Area Code
Qwest Corporation	Utah	505107
Qwest Corporation	Wyoming	515108
Qwest Corporation	Iowa	355141
Qwest Corporation	Nebraska	375143
Qwest Corporation	North Dakota	385144
Qwest Corporation	South Dakota	395145
Qwest Corporation	Oregon	535163
Qwest Corporation	Washington	525161

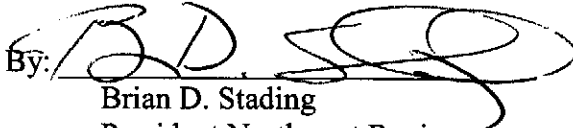
QWEST CERTIFICATION OF NETWORK EMERGENCY PREPAREDNESS AND
COMPLIANCE WITH SERVICE QUALITY MEASURES

I, Brian D. Stading, President Northwest Region, including the State of Washington, an officer of CenturyLink ("Company"), do hereby certify under penalty of perjury under the laws of the State of Washington that the following statement is true and correct.

The Company hereby certifies to the Washington Utility and Transportation Commission, pursuant the requirements of WAC 480-123-030, that in 2010 Qwest Corporation:

- 1) was able to remain functional in emergencies, and,
- 2) substantially complied with applicable service quality provisions in Washington Commission rules.

DATED this 7 day of July, 2011, at Seattle
(location)

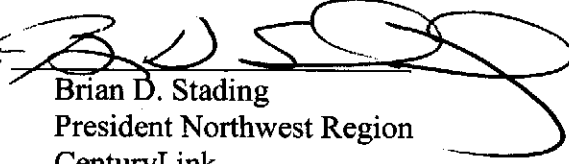
By: 
Brian D. Stading
President Northwest Region
CenturyLink

**QWEST CERTIFICATION OF PUBLICATION OF THE AVAILABILITY OF ITS
APPLICABLE TELEPHONE ASSISTANCE PLANS**

I, Brian D. Stading, President Northwest Region, including the State of Washington, an officer of CenturyLink ("Company"), do hereby certify under penalty of perjury under the laws of the State of Washington that the following statement is true and correct.

The Company hereby certifies it has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within Qwest's designated service area in Washington. Such publicity includes advertisements likely to reach those who are not current customers of Qwest within its designated service area in Washington.

DATED this 7 day of July, 2011, at Seattle.
(location)

By: 
Brian D. Stading
President Northwest Region
CenturyLink

Attachment B

Qwest Wire Centers Upon Which Qwest's Interstate Access Support (IAS) Fund is Calculated

Wire Centers	Zones
Black Diamond	4
Castle Rock	4
Colfax	4
Colville	4
Coulee Dam	4
Crosby	4
Dayton	4
Deer Park	4
Easton	4
Elk	4
Green Bluff	4
Hoodspport	4
Joyce	4
Loon Lake	4
Napavine	4
Omak	4
Oroville	4
Othello	4
Rochester	4
Waitsburg	4
Warden	4
Winlock	4
Crystal Mountain	5
Northport	5
Pateros	5
Pomeroy	5
Springdale	5

Qwest Corporation USF 2010 Data Submission

Filed 7/31/11

525161

Washington

DL	ACCOUNT		DATA
060	TOTAL LOOPS		1,260,680
070	1.3 LOOPS		1,221,287
080	RESERVED	N/A	
160	2001		6,015,716,227
170	1220		1,763,692
190	3100		4,872,128,010
195	3400		3,353,146
200	RESERVED	N/A	
205	RESERVED	N/A	
210	4340		105,841,150
220	NET PLANT	CALC	1,036,157,613
230	2210		1,041,006,951
235	2220		1,892,351
240	2230		1,644,508,313
245	TOTAL CENTRAL OFFICE	CALC	2,687,407,615
250	4.13 CIRCUIT INV.	CALC	819,247,634
255	2410		2,758,574,679
260	3100/2210		884,342,268
265	3100/2220		1,942,417
270	3100/2230		1,427,144,234
275	COE DEPR.	CALC	2,313,428,919
280	3100/2410		2,240,619,155
285	RESERVED	N/A	
290	RESERVED	N/A	
295	RESERVED	N/A	
300	RESERVED	N/A	
305	RESERVED	N/A	
310	4340/2210		18,387,463
315	4340/2220		33,425
320	4340/2230	CALC	29,047,198
325	COE NONCURR TAXES		47,468,086
330	4340/2410		48,725,120
335	6110		977,130
340	6110 BENEFITS		118,360
345	6110 RENTS		(59,614)
350	6120		30,829,039
355	6120 BENEFITS		747,966
360	6120 RENTS		5,904,120
365	6210		13,161,097
370	6210 BENEFITS		718,635
375	6210 RENTS		(98,716)
380	6220		1,530
385	6220 BENEFITS		0
390	6220 RENTS		0
395	6230		11,765,960
400	6230 BENEFITS		932,709
405	6230 RENTS		(2,873,595)
410	COE EXP 365+380+395	CALC	24,928,587
415	RESERVED	N/A	
420	RESERVED	N/A	
425	RESERVED	N/A	
430	6410		83,351,349
435	6410 BENEFITS		4,073,598
440	6410 RENTS		913,438
445	PLANT SPEC EXP	CALC	140,086,105
450	6530		60,903,939
455	6530 BENEFITS		31,776,050
465	RESERVED	N/A	

DL	ACCOUNT		DATA
470	RESERVED	N/A	
480	RESERVED	N/A	
485	RESERVED	N/A	
500	RESERVED	N/A	
505	RESERVED	N/A	
510	6560/2210		59,113,647
515	6560/2220		81,919
520	6560/2230		71,851,812
525	COE DEPREC EXP	CALC	131,047,378
530	6560/2410		96,340,588
535	6710		13,533,840
540	6710 BENEFITS		661,970
550	6720		79,690,627
555	6720 BENEFITS		4,144,746
565	TOTAL CORP EXP 535+550	CALC	93,224,467
600	TOTAL BENEFITS	CALC	60,723,627
610	TOTAL RENTS	CALC	3,787,520
620	RESERVED	N/A	
630	RESERVED	N/A	
650	7200		61,147,137
655	RESERVED	N/A	
700	COST STUDY 2410		2,755,280,711
710	COST STUDY CAT 1		2,513,636,416
800	2680		20,615,846
805	2680/2230	N/A	
810	2680/2230 CAT 4.13	N/A	
815	2680/2410	N/A	
820	2680/2410 CAT 1	N/A	
830	6560/2680		2,346,359
ZAL1	C&WF PORTION OF CL TO CAT 1		2,516,641,496
ZAL2	COE PORTION OF CL TO CAT 4.13		819,247,634
ZAL3	C&WF CAT 1 FACTOR		0.912298
ZAL4	COE CAT 4.13 FACTOR		0.304847
ZAL5	C&WF CAT 1 FACTOR (GROSS ALLOCATOR)		0.418344
ZAL6	COE CAT 4.13 FACTOR (GROSS ALLOCATOR)		0.136185
ZAL7	MATERIALS & SUPPLIES FOR C&WF CAT 1		737,831
ZAL8	MATERIALS & SUPPLIES FOR COE CAT 4.13		240,188
ZAL9	ACC DEPR/DEF OPER INC TAX C&WF CAT 1		2,088,563,650
ZAL10	ACC DEPR/DEF OPER INC TAX COE CAT 4.13		719,711,917
ZAL11	C&WF CAT 1 FACTOR (NET ALLOCATOR)		0.412517
ZAL12	COE CAT 4.13 FACTOR (NET ALLOCATOR)		0.095984
ZAL13	C&WF MAINTENANCE EXPENSE CAT 1		71,491,587
ZAL14	COE MAINTENANCE EXPENSE CAT 4.13		8,002,093
ZAL15	NTWK/GEN SUPP EXP C&WF CAT 1/COE CAT 4.13		13,916,092
ZAL16	NTWK OP EXP C&WF CAT 1 & COE CAT 4.13		16,152,259
ZAL17	DEPR & AMORT EXPENSE C&WF CAT 1		87,891,302
ZAL18	DEPR & AMORT EXPENSE COE CAT 4.13		39,949,375
ZAL19	CORP OP EXP C&WF CAT 1 & COE CAT 4.13		49,030,208
ZAL20	OPERATING TAXES C&WF CAT 1/COE CAT 4.13		33,907,861
ZAL21	BENEFITS C&WF CAT 1 & COE CAT 4.13		33,673,012
ZAL22	RENTS C&WF CAT 1 & COE CAT 4.13		2,100,289
ZAL23	RETURN COMPONENT C&WF CAT 1		48,241,764
ZAL24	RETURN COMPONENT COE CAT 4.13		11,224,789
ZAL25	TOTAL UNSEPARATED COSTS		415,580,631
ZAL26	STUDY AREA COST PER LOOP		329.65