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Northwest Region Vice President
Public Policy

July 30, 2012

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: 2012 ETC Certification: CenturyLink QC's 2012 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,
CenturyLink QC provides the following information. For ease of reading, CenturyLink
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 CenturyLink officers certifying the data contained
in this filing are in Attachments A1 and A2.

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Confidential per WAC 480-07-160

Due to changes in Interstate Access Support (“IAS”) rules precipitated by the release of the FCC’s ICC/USF Transformation Order, FCC 11-161, Attachment A2 is a copy of the document filed in last year’s ETC filing, as it was the last one filed.

(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 which the ETC will report as the basis for support from the federal high-cost fund.

Response: In accordance with FCC Docket No. 96-45, CenturyLink QC received \$2,606,545 of Interstate Access Support (“IAS”) for the state of Washington in the calendar year 2011. Although CenturyLink QC 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 A2). CenturyLink QC’s actual expenditures during the certification period for the provision maintenance and upgrading of facilities and services in designated support areas significantly exceeded the \$2,606,545 in IAS support received. Attachment B is a list of the wire centers on which CenturyLink QC’s IAS support is based.

CenturyLink QC’s 2011 investments in its wire centers upon which its IAS support are calculated (See Attachment B) was BEGIN CONFIDENTIAL **XXXXX** END CONFIDENTIAL CenturyLink QC’s 2011 investments for all other wire centers was BEGIN CONFIDENTIAL**XXXXX**END CONFIDENTIAL. These amounts do not include expenses paid in rural or non-rural areas because CenturyLink QC 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 2011 were BEGIN CONFIDENTIAL**XXXXX**END CONFIDENTIAL.

In the past, CenturyLink QC would have filed a USF Loop Cost Data Submission with the National Exchange Carrier Association (NECA) pursuant to 47 C.F. R. § 36.611, and would have provided a copy as part of its Washington ETC certification process. With the issuance of the FCC’s ICC/USF Transformation Order, FCC-11-161, CenturyLink QC, as a price cap carrier, is no longer required to make such submissions.

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(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, CenturyLink QC 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 areas for which it receives IAS support. CenturyLink QC has made substantial investments in the calendar year 2011 as well as over the previous 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: CenturyLink QC is exempt from these 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: CenturyLink QC is exempt from these 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 C provides Washington complaints to the FCC and to the Consumer protection division of the Attorney General of Washington lines for

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2011. The complaint categories include billing, call handling, commitment/interval, held order, installation, repair, treatment, and other.

CenturyLink QC'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 CenturyLink QC's records/data to substantiate the claim.
- Determine if CenturyLink QC's practices, which may have led to the complaint, are in accord with applicable statutes and rules.
- If CenturyLink QC 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 CenturyLink QC 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 CenturyLink QC 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 CenturyLink QC business/operation unit to take corrective action to fix the deficient or defective systems or processes.
- In any event, CenturyLink QC always works closely with the regulating agencies to quickly resolve customer's service-affecting issues.

Although CenturyLink QC does not track how each and every one of its complaints are resolved, Attachment C provides a breakdown of its 2011 complaints regarding whether the complaint was for an IAS supported service or for other services not supported by IAS funding.

(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: CenturyLink QC certifies that in 2011 it substantially met the applicable service quality standards found in WAC 480-123-030 (1)(h). CenturyLink QC's officer certification for this section is in Attachment A1.

(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: CenturyLink QC certifies that in 2011 it had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g). CenturyLink QC's officer certification for this section is in Attachment A1.

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(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: CenturyLink QC certifies that it has publicized the availability of its applicable telephone assistance programs. CenturyLink QC's officer certification for this section is in Attachment A1.

(8) 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.

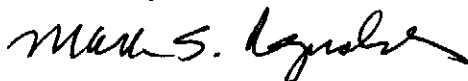
(2) The report must include a substantive plan of the investments and expenditures to be made with federal support and a substantive description of how those investments and expenditures will benefit customers.

Response: CenturyLink QC expects its IAS funding for the specified funding period to be consistent with its funding for the 2010/2011 funding period. Although CenturyLink QC 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. CenturyLink QC plans to continue to provide services at a level that meets the requirements of 47 U.S.C. §254 by providing high quality telecommunication services to customers in the service areas for which it receives IAS support. CenturyLink QC will continue to invest in the designated support areas in order to provide high quality telecommunication service to benefit its customers.

CenturyLink QC expects its level of IAS funding for the specified funding period to be consistent with its funding for the 2010/2011 funding period.

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

Sincerely,



Mark S. Reynolds

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