

**FILED WITH  
Executive Secretary**

**October 30, 2013**

**IOWA UTILITIES BOARD**

**FCU-2012-0019**

**PUBLIC**

**OFFICE OF CONSUMER ADVOCATE**

**OCA DISCOVERY RESPONSE EXHIBITS**

**IN RE: REHABILITATION CENTER OF ALLISON**

**DOCKET NO. FCU-2012-0019**

**October 30, 2013**

## OCA DISCOVERY RESPONSE EXHIBITS (PUBLIC)

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**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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1. Who is or are the originating long distance carrier or carriers for the Shell Rock Clinic? If CenturyLink has a contractual or other relationship with any such carrier with respect to the transport of long distance calls from the Shell Rock Clinic to the Allison Rehabilitation Center, please provide a detailed description of the relationship, including a description of the functions performed by the originating carrier and a description of the functions performed by CenturyLink.

**CONFIDENTIAL INFORMATION:**

[REDACTED]

**CONFIDENTIAL INFORMATION:**

[REDACTED]



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #1 - Supplemental**

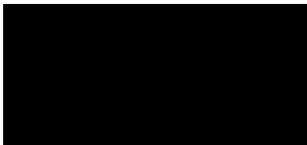
DATE : September 23, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #1. Please list the carriers with which CenturyLink has or had contracts and who carry or carried, or may carry or may have carried, traffic for CenturyLink from the Waverly Health Center or the Shell Rock Clinic to the Allison Rehabilitation Center from and after January 1, 2011.

Response:

The attached Confidential spreadsheet shows the routing for each subject telephone number and lists the carriers that were in the routing tables.



NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**CONFIDENTIAL**

**These pages (pages 2 through 7 of 7)  
contain Confidential Material**

**(Filed under seal)**

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #1 – Supplemental #2**

DATE : October 25, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink

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**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

Supp. #1-2. On the spreadsheet provided, it appears there are two tabs each for the NPA NXX 319-267 (Allison), 319-352 (Waverly) and 319-885 (Shell Rock), one for “JUR” “ITE” and the other for “JUR” “ITA”. Is that right?

Response: Yes.

Do these tabs represent the routing on calls completed to those NPA NXXs? If not, what do they represent?

Response: Yes, the tabs represent the routing of calls completed to the specified NPA NXX.

What do “JUR”, “ITE” and “ITA” stand for?

Response: “JUR” is for Jurisdiction; “ITE” is for Interstate; and “ITA” is for intrastate.

[OCA Redaction]

[OCA Redaction]

What is {"[REDACTED]}?"?

Response: {"[REDACTED]} means the calls are routed on {"[REDACTED]"}.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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2. Who is or are the originating long distance carrier or carriers for the Waverly Health Center? If CenturyLink has a contractual or other relationship with any such carrier with respect to the transport of long distance calls from the Waverly Health Center to the Allison Rehabilitation Center, please provide a detailed description of the relationship, including a description of the functions performed by the originating carrier and a description of the functions performed by CenturyLink.

**CONFIDENTIAL INFORMATION:**

[REDACTED]

**CONFIDENTIAL INFORMATION:**

[REDACTED]



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #2 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #2 Is the response to data request number 2 intending to refer to “319.352.4120” rather than “319.391.4120”?

Response: Yes.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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3. Please provide a complete description of the precise nature of the routing change or changes made by CenturyLink for calls completing to the NPA NXX of the Allison Rehabilitation Center, as referenced in your letter to Iowa Utilities Board staff dated November 2, 2012. Please produce a copy of any notification of this change that was sent to any affected carrier and a copy of any correspondence, including electronic correspondence, between CenturyLink and the affected carrier concerning the change.

While investigating the issue, following the established CenturyLink process, the technician created a trouble ticket to investigate the issue on behalf of our CenturyLink long distance customers. In the investigation, our technician was able to find the call records for the calls from our long distance customer, to the Rehabilitation Center of Allison called TN 319 267-2791. These calls had duration and there was no report to us of any failure on them by our customers. Additionally, we reviewed the routing on these calls. They were all routed using an underlying carrier. Our technician did test calls with the underlying carrier, and all calls completed successfully. However, in the interest of the concerns raised here, and in an abundance of caution, we made a routing change for calls completing to the NPA NXX of 319 267, and tested for call completion with this change. With this change, the calls would process over the primary route of our Feature Group network.

CenturyLink activated a change in our switches' routing tables to make the routing change. As there was no detail given as to precise date and time of calls with problems, CenturyLink initiated this change out of an abundance of caution to ensure we addressed this issue with our customer.

Our process, for when an underlying carrier is at fault, is to notice them of the fault. However, since in this case testing indicated they were not at fault, we did not do a formal notice.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #3 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #3. What was the date of the routing change referenced in response to this data request? What exactly was changed? If a carrier was removed from the routing, which carrier was removed? Who made the change? How precisely was it accomplished, e.g., did a CenturyLink employee make a manual entry into the automated system? Was the change made without any notice or communication of any kind to the affected carrier? If there was any notice or communication, please produce.

Response:

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

The routing change was made on 10/1/12. This change was made at the request of the Repair Technician. The request that the Repair Technicians can make is for a temporary change in the routing. That is what was done here initially. With the temporary change in place for 10 days, the Engineering team can then work on the permanent change requested.

While the temporary change was still in place, our Engineering group performed the work for the fix to be put in place for the long term. Our Senior Engineer performed the task to manually place a change in the long distance routing table such that the terminating NPA NXX route will choose CenturyLink's feature group facility as the first choice for routing the calls over the use of underlying carriers. However, underlying carriers will still be in the route for redundancy in the case of a need for backup and overflow. The exception is that { [REDACTED] } will not be an underlying carrier for this route.

Since there was no call found that failed, and the underlying carrier was taken out of route out of an abundance of caution, there was no failure to provide notice to the underlying carrier.

Are the trouble tickets referenced in response to this data request included in the response to DR 13? If not, please produce.

Response:

Yes.

Please explain what CenturyLink's "Feature Group" network is.

Response:

Attached are the Qwest Corporation d/b/a CenturyLink Iowa Tariff #4 Access Service pages containing the descriptions of Feature Group A, Feature Group B, Feature Group C, and Feature Group D. For the previous response provided for data request #3, CenturyLink's response referred to Feature Group D in the legacy Qwest long distance network.



QC Iowa Tariff 4  
Access.pdf

The company tariffs and schedules including the Qwest Corporation d/b/a CenturyLink Iowa Tariff #4 can be found at: [www.centurylink.com/tariffs](http://www.centurylink.com/tariffs).

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #3 – Supplemental #2**

DATE : October 25, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink

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Supp. #3-2: (Also related to responses in DRs and Supp DRs 6, 7, 8 &9 – all CONFIDENTIAL):  
Please provide the following clarification:

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

- A. What was the date of the temporary change? How did the temporary change alter the routing of the calls? Please explain the mechanics of what was done when the temporary change was made.

Response: When the temporary change was made on October 1, 2012, the CenturyLink technician placed { [REDACTED] } as the primary route for this NPA NXX in the routing table. Following our investigation process requirements, the temporary change was made by the technician via a timer that automatically expires after a specified time period. The permanent change request was sent to the Network Engineering team to make it a permanent change before the temporary change expired.

- B. What was the date of the permanent change? How did the permanent change alter the routing of the calls? Please explain the mechanics of what was done when the permanent change was made.

Response: The permanent change was requested on October 1, 2012. It was entered on October 5, 2012, and was then uploaded to production between October 8 and October 10, 2012. All of this was done during the time of the temporary change and before it expired; and the permanent change remains in effect. The permanent change consists of the { [REDACTED] } remaining in the first choice position for the intrastate routing to the NPA NXX 319-267.

- C. In terms of the routing of the calls, what was the difference, if any, between the temporary change and the permanent change?

Response: There was no difference.

D. Does the engineering team need ten days to make a permanent change? If so, why?

Response: Ten days are necessary because of the timing of the upload process. Because it can take up to ten days for a permanent change to be uploaded to production, the temporary changes are set for ten days to ensure there is no gap between the temporary change expiring and the permanent change being activated.

E. When you say {REDACTED} will not be an underlying carrier for “this route” (DR #3 Supp.), what does “this route” mean? Does it mean all calls originating from Waverly Health Center or Shell Rock Clinic and terminating to NPA NXX 391-267? Does I mean all intrastate calls originating from CenturyLink long distance customers in Iowa and terminating to NPA NXX 319-267? Does it mean all interstate and all intrastate calls originating from CenturyLink long distance customers and terminating to NPA NXX 319-267? Does it mean something else?

Response: It means that the routing for all CenturyLink QC long-distance *intrastate* calls, regardless of where the call originates from, terminating to the 319-267 NPA NXX will not include {REDACTED} as the primary underlying carrier.

F. If the routing change was made October 1, 2012 (DR #3 Supp.), and if {REDACTED} was removed as an underlying carrier for the route, even for redundancy (DR #3 Supp.), why is {REDACTED} still shown in the routing tables (DR #8 Supp. & DR #9 Supp.) as the first underlying carrier for the week of October 1 and the second underlying carrier for the week of October 8? In other words, the supplemental response to DR #3 suggests that {REDACTED} was removed from the routing, but the supplemental responses to DR #8 and DR #9 suggest {REDACTED} was not removed. Please explain what appears to be a contradiction.

Response: This type of change is designed to move the {REDACTED} into the first position, which moved {REDACTED} into the second position and not entirely out of route. {REDACTED}

G. Why was {REDACTED}, which served as the first underlying carrier for the week of September 17, 2012, removed from the routing table for the week of September 24, 2012? Why was {REDACTED} restored to the routing table for the weeks of October 1, and October 8, 2012?

Response: CenturyLink received rate increases from {REDACTED} effective September 26, 2012, that included a per minute rate increase for intrastate traffic terminating in the 319-267 NPA NXX. CenturyLink removed {REDACTED} the week before the rate changes went into effect to ensure that CenturyLink did not route traffic at the incorrect rate before the system could sync the rate changes. This was done so that the routing and the billing would match.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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4. Please provide a complete explanation as to why the routing change or changes referenced above might improve the likelihood that calls to the Allison Rehabilitation Center would complete.

This question creates the presumption that CenturyLink believed a change in the routing would “improve the likelihood” that calls would complete to the Allison Rehabilitation Center. To the extent that such a presumption is created, CenturyLink objects to the form of the question.

CenturyLink made the routing change simply out of an abundance of caution, and to ensure the network remained fully capable to appropriately process calls. Since CenturyLink had no evidence that calls were not completing to the Allison Rehabilitation Center, we did not believe the change was necessary.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

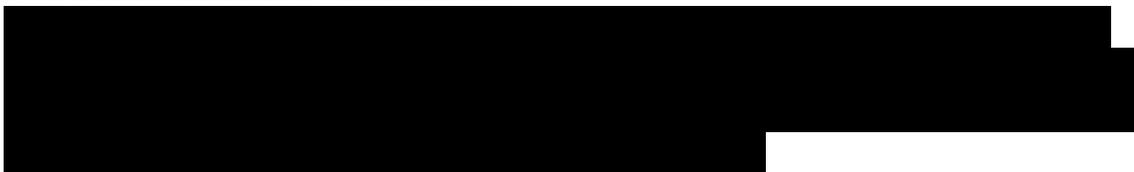
**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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5. Please explain any financial consequence to CenturyLink of the routing change or changes referenced above. In other words, did the cost to CenturyLink of routing the calls change when the routing was changed? If so, in what direction and by how much?

**CONFIDENTIAL INFORMATION:**



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #5 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #5. Please explain why and how the costs to CenturyLink increased following the routing change. Please identify and explain each CenturyLink cost that was avoided or lower before the change.

Response:

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

When we changed our routing to the use of our feature group facility for termination of this traffic, CenturyLink was required to pay the tariffed tandem charge to INS and the terminating charge to the LEC (Dumont) for a total of \$.0914 per minute.

Prior to the routing change, CenturyLink paid { [REDACTED] } at { [REDACTED] } per minute.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #5 – Supplemental #2**

DATE : October 25, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink

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Supp. #5-2: Please break down the \$0.0914 per minute charge as between the INS tariffed tandem charge and the Dumont terminating charge.

Response: The first supplemental response to Data Request #5 contained a typographical error. The current charge is actually \$0.092146 per minute. Dumont's filed tariff shows that the end office rate (to Dumont) is \$0.047157, leaving the INS portion of the total to be \$0.044989.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

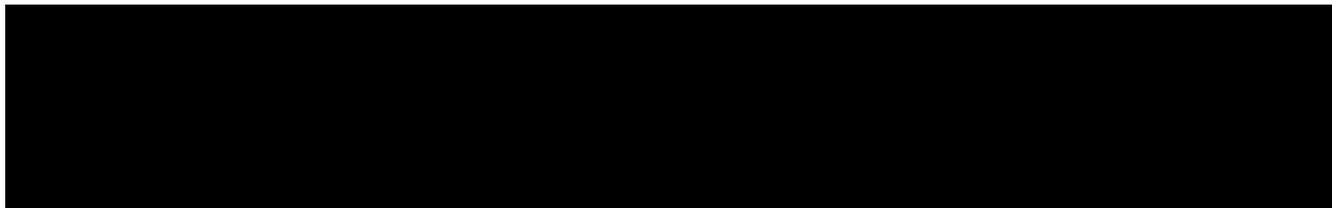
**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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6. For the time period immediately preceding the routing change or changes referenced above, please provide a complete description of the routing on calls placed from the Shell Rock Clinic and intended to reach the Allison Rehabilitation Center. Please include the identity of any underlying carrier or carriers and the relevant routing tables.

**CONFIDENTIAL INFORMATION:**



Please indicate whether the signaling network employed in the routing supported multiple protocols.



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #6 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #6. Please explain why the response to data request #6 has a table with two rows of data, each listing a series of carriers, with two different dates, September 17, 2012, and September 24, 2012, as opposed to a single row of data, listing a single series of carriers, with a single date. What we are seeking to learn via data request #6 is the routing on calls from the Shell Rock Clinic to the Allison Rehabilitation Center immediately before the routing change referenced in response to data request #3.

Please clarify what the listing of the multiple vendors in a particular row actually means in terms of how a call is routed. Will a call necessarily route through the entire list of vendors? Or is the listing a menu of possible vendors through which the call may route? Or some other meaning?

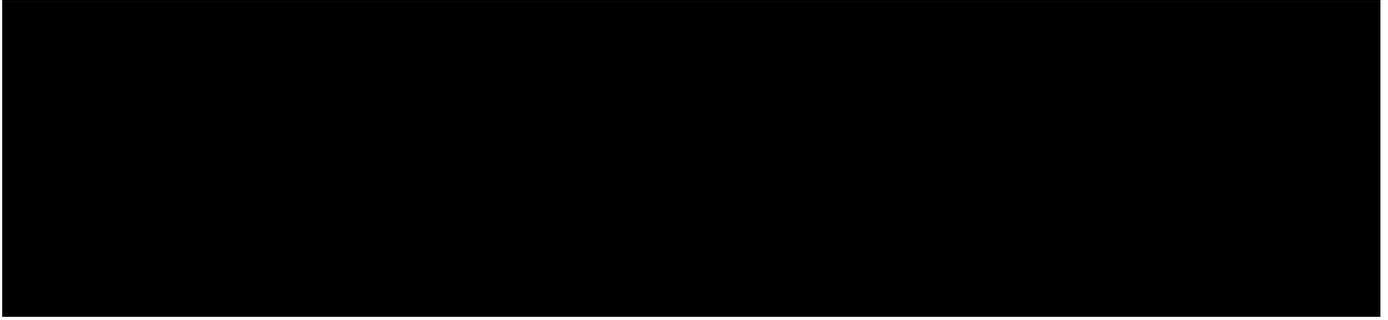
Response:

Since the initial data #6 request asked for the routing details preceding the changes made on October 1, 2012, we provided the routing for the two weeks preceding. That routing is shown in two rows, one row for the week of September 17, 2012 and one row for the week of September 24, 2012. The table shows the routing possibilities for calls from the Shell Rock Clinic to the Allison Rehabilitation Center (they are in the NPA/NXX of 319/267) for the weeks listed.

A call will route to any of the underlying carriers listed, but primarily the call will go to the first underlying carrier in the routing table. If they cannot carry the call, they will pass it back to our long distance entity to send to another underlying carrier, or our feature group facility to deliver the call.

To provide more clarity, the table is repeated below with titles explained more.

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**



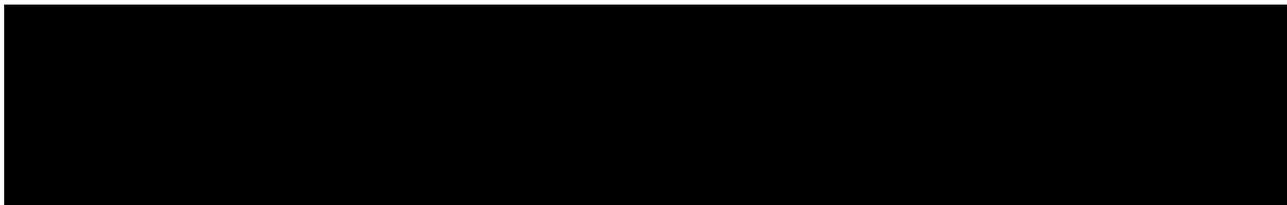
**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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7. For the time period immediately preceding the routing change or changes referenced above, please provide a complete description of the routing on calls placed from the Waverly Health Center and intended to reach the Allison Rehabilitation Center. Please include the identity of any underlying carrier or carriers and the relevant routing tables.

**CONFIDENTIAL INFORMATION**



Please indicate whether the signaling network employed in the routing supported multiple protocols.



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #7 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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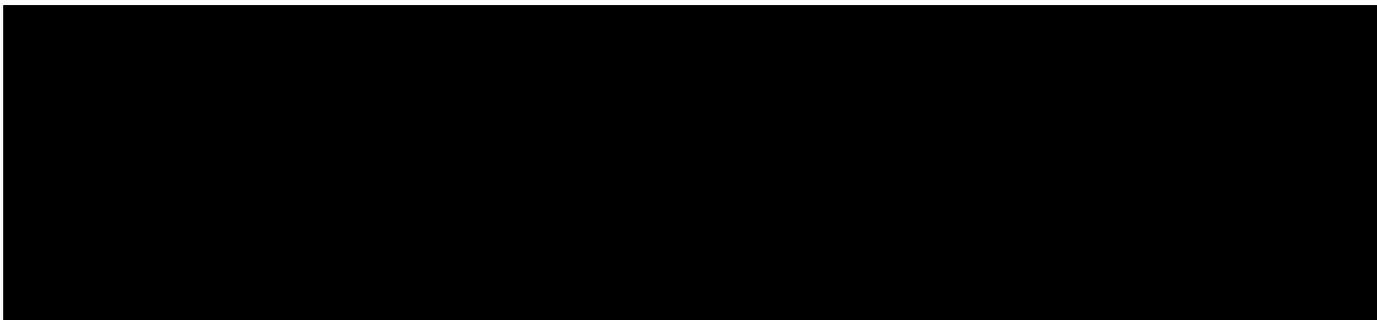
Supp. #7. Please explain why the response to data request #7 has a table with two rows of data, each listing a series of carriers, with two different dates, September 17, 2012, and September 24, 2012, as opposed to a single row of data, listing a single series of carriers, with a single date. What we are seeking to learn via data request #7 is the routing on calls from Waverly Health Center to the Allison Rehabilitation Center immediately before the routing change referenced in response to data request #3.

Response:

Since the initial data request asked for the routing preceding the changes made on October 1, 2012, we provided the routing for the two weeks preceding. That routing is shown in two rows, one row for the week of September 17, 2012 and one row for the week of September 24, 2012. The table shows the routing possibilities for calls from the Waverly Health Center to the Allison Rehabilitation Center (they are in the NPA/NXX of 319/267) for the weeks listed.

To provide more clarity, the table is repeated below with titles explained more.

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**



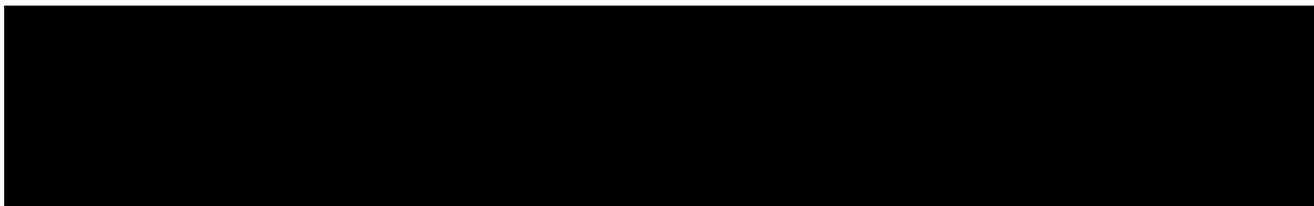
**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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8. For the time period immediately following the routing change or changes referenced above, please provide a complete description of the routing on calls placed from the Shell Rock Clinic and intended to reach the Allison Rehabilitation Center. Please include the identity of any underlying carrier or carriers and the relevant routing tables.

**CONFIDENTIAL INFORMATION:**



Please indicate whether the signaling network employed in the routing supported multiple protocols.



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #8 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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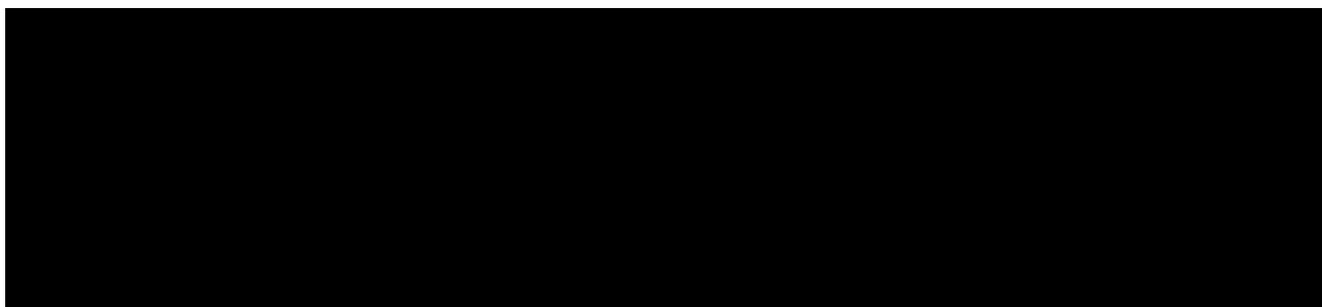
Supp. #8. Please explain why the response to data request #8 has a table with two rows of data, each listing a series of carriers, with two different dates, October 1, 2012, and October 8, 2012, as opposed to a single row of data, listing a single series of carriers, with a single date. What we are seeking to learn via data request #8 is the routing on calls from the Shell Rock Clinic to the Allison Rehabilitation Center immediately after the routing change referenced in response to data request #3.

Response:

Since the initial data request asked for the routing following the changes made on October 1, 2012, we provided the routing for the two weeks following. That routing is shown in two rows, one row for the week of October 1, 2012 and one row for the week of October 8, 2012. The table shows the routing possibilities for calls from the Shell Rock Clinic to the Allison Rehabilitation Center (they are in the NPA/NXX of 319/267) for the weeks listed.

To provide more clarity, the table is repeated below with titles explained more.

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**



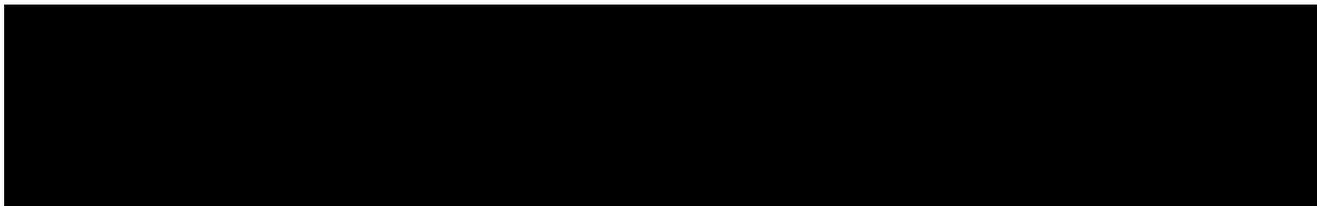
**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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9. For the time period immediately following the routing change or changes referenced above, please provide a complete description of the routing on calls placed from the Waverly Health Center and intended to reach the Allison Rehabilitation Center. Please include the identity of each underlying carrier and the relevant routing tables.

**CONFIDENTIAL INFORMATION:**



Please indicate whether the signaling network employed in the routing supported multiple protocols.



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #9 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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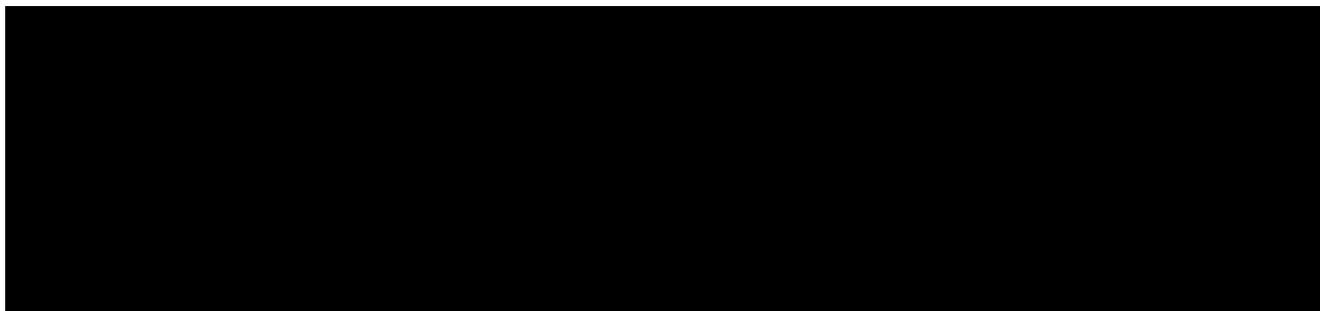
Supp. #9. Please explain why the response to data request #9 has a table with two rows of data, each listing a series of carriers, with two different dates, October 1, 2012, and October 8, 2012, as opposed to a single row of data, listing a single series of carriers, with a single date? What we are seeking to learn via data request #8 is the routing on calls from the Waverly Health Center to the Allison Rehabilitation Center immediately after the routing change referenced in response to data request #3.

Response:

Since the initial data request asked for the routing following the changes made on October 1, 2012, we provided the routing for the two weeks following. That routing is shown in two rows, one row for the week of October 1, 2012 and one row for the week of October 8, 2012. This table shows the routing possibilities for calls from the Waverly Health Center to the Allison Rehabilitation Center (they are in the NPA/NXX of 319/267) for the weeks listed.

To provide more clarity, the table is repeated below with titles explained more.

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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10. With respect to each of the underlying carriers identified in response to the above requests, was the underlying carrier using switched technology or packet technology?

CenturyLink's underlying carriers generally use a combination of TDM switched technology and packet switched technology. As with the most carriers' networks, the underlying carriers' networks have evolved over time, and are not always purely one technology. Since CenturyLink does not have a detailed, real time, view of all of the underlying carriers' network infrastructure, we cannot confirm the specific technology used in every call that processes in their network. However, we do know the technology used in the interconnection between the CenturyLink Long Distance network and the networks of our underlying carriers. Below is the listing of the type of interconnection between the CenturyLink Long distance network and the networks of the underlying carriers shown in the above tables:

**CONFIDENTIAL INFORMATION:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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11. With respect to each of the underlying carriers identified in response to the above requests, did the underlying carrier have a point of presence with Dumont Telephone Company?

CenturyLink has inquired to our underlying carriers whether they have a point of presence with Dumont. Their responses are shown below:

**CONFIDENTIAL INFORMATION:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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12. Is CenturyLink's identification of the underlying carriers in response to the above requests a complete identification of the underlying carriers?

Yes, the listing shows our direct underlying carriers, based on the dates shown and the criteria of the questions.

In other words, is it possible that one or more of the underlying carriers identified by CenturyLink was using one or more additional underlying carriers that CenturyLink did not know about?

Yes, it is possible that one or more of the underlying carriers in route for CenturyLink was using additional underlying carriers to complete the call. CenturyLink does not have access to information that could identify these additional underlying carriers, if any.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #12 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #12. Please explain what you mean by “direct” underlying carrier.

Response:

When CenturyLink responded to your question in the data request #12, we stated that:

“Yes, the listing shows our direct underlying carriers, based on the dates shown and the criteria of the questions.”

Data request #12 then went on to ask:

In other words, is it possible that one or more of the underlying carriers identified by CenturyLink was using one or more additional underlying carriers that CenturyLink did not know about?

And we replied:

“Yes, it is possible that one or more of the underlying carriers in route for CenturyLink was using additional underlying carriers to complete a call. CenturyLink does not have access to information that could identify these additional underlying carriers, if any.”

To explain further:

The tables show the underlying carrier that CenturyLink has a *direct* contractual relationship with as a co-carrier for our long distance traffic. Each of those underlying carriers may use additional underlying carriers to complete the call.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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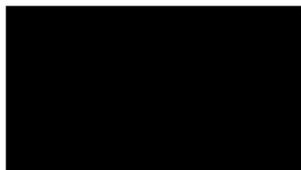
13. According to the letter from Dumont Telephone Company to the Iowa Utilities Board staff dated October 18, 2012, Waverly Health Center staff had been experiencing trouble for over two years and had reported the trouble to CenturyLink. Does CenturyLink have a record of such reports from Waverly Health Center.

Yes, CenturyLink has records of trouble reports from Waverly Health Center.

If so, please give the date of each such trouble report, state the nature of the trouble reported, and describe any actions taken to address the trouble.

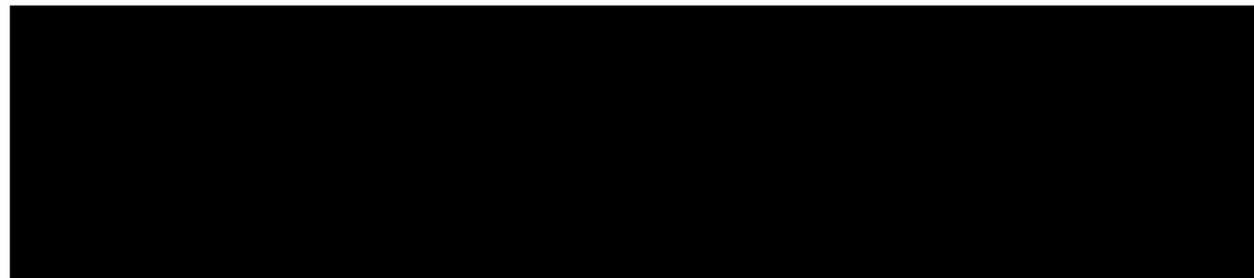
**CONFIDENTIAL INFORMATION:**

The spreadsheet attached to this response provides all of the details required for this item.



Please produce any records regarding these trouble reports.

**CONFIDENTIAL INFORMATION :**



NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**CONFIDENTIAL**

**These pages (pages 2 through 56 of 56)  
contain Confidential Material**

**(Filed under seal)**

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #13 – Supplemental**

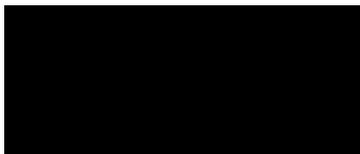
DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #13. For each of the trouble tickets identified in the spreadsheet provided in response to this data request, please provide a narrative in plain English explaining any known details regarding the trouble reported, any known details of why the trouble was occurring, and any action taken by CenturyLink, or by any other person or company if known, in response to the reported trouble. Please include, for each of the terminating numbers shown in the spreadsheet, the name and address of the party that holds the terminating number, if known.

Response: Please see the revised spreadsheet for the requested information.

**ATTACHMENT IS CONFIDENTIAL INFORMATION:**



NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**CONFIDENTIAL**

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**(Filed under seal)**

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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14. According to the letter from Dumont Telephone Company to the Iowa Utilities Board staff dated October 18, 2012, the trouble was fixed “but then returns after several weeks or months.” Can CenturyLink offer an explanation that would help the Iowa Utilities Board understand why the trouble that Dumont Telephone Company says the Waverly Health Center reported would be fixed but then return after several weeks or months? If so, please provide the explanation.

There were no repeat reports in the trouble reports (see the spreadsheet in item # 13). CenturyLink can only reference calls on our network and will not speculate on what other events might or might not have taken place, given the distinct possibility that the problems that Dumont references involved other carriers besides CenturyLink.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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15. Is the switch serving the Shell Rock Clinic TDM-based or packet-based?

The CenturyLink Long Distance switch serving the Shell Rock Clinic can process either TDM or packet based traffic.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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16. Is the switch serving the Waverly Health Center TDM-based or packet-based?

The CenturyLink Long Distance switch serving the Waverly Health Center can process either TDM or packet based traffic.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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17. Is the switch serving the Allison Rehabilitation Center TDM-based or packet-based?

The CenturyLink Long Distance switch serving the Allison Rehabilitation Center can process either TDM or packet based traffic.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

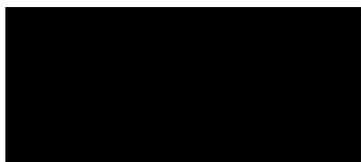
DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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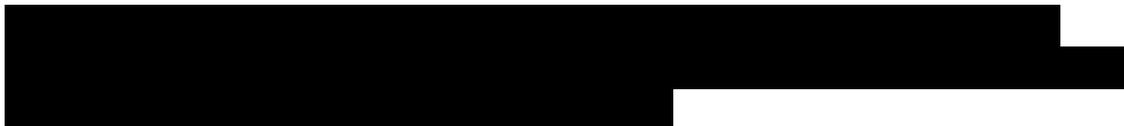
18. Please provide a complete description of all tests that CenturyLink requires an underlying carrier to pass and all performance requirements, metrics or standards that CenturyLink requires an underlying carrier to agree to or meet. Please provide all documents that evidence these tests, requirements, metrics and standards, including any relevant contractual documents.

Below is the detailed testing plan used in testing our underlying carriers.

**CONFIDENTIAL INFORMATION:**



**CONFIDENTIAL INFORMATION:**



**CONFIDENTIAL INFORMATION:**

[REDACTED]

| [REDACTED]

[REDACTED]

**CONFIDENTIAL**

**These pages (pages 6 through 9 of 9)  
contain Confidential Material**

**(Filed under seal)**

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #18 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

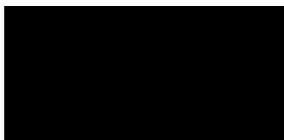
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Supp. #18. Please produce (or identify if previously produced) the template contract language referenced in response to this request. Does the template contract language appear in CenturyLink's contract with each of the underlying carriers identified in response to earlier data requests? If so, for each such underlying carrier, when did such template language become a part of the contract between CenturyLink and the underlying carrier?

Response: The template language that was referenced in the initial response to data request #18 was quoted in the response. Attached to this response is the confidential quoted template language.

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

**ATTACHMENT IS CONFIDENTIAL INFORMATION:**



The template language with some negotiated changes was in the final agreement with { [REDACTED] }, which is dated June 17, 2010.

What, if any, ongoing tests does CenturyLink conduct, as opposed to initial tests?

Response: Should a problem be found in working a customer reported trouble, CenturyLink may ask the customer to place a test call, or we may place a test call so the Repair Technician can be certain that the trouble is fixed. This is not "ongoing" testing per se, but is used when trouble reports indicate a need.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #18 – Supplemental**

DATE : September 23, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #18. Please produce (or identify if previously produced) the template contract language referenced in response to this request. Does the template contract language appear in CenturyLink's contract with each of the underlying carriers identified in response to earlier data requests? If so, for each such underlying carrier, when did such template language become a part of the contract between CenturyLink and the underlying carrier?

Additional Response:

Below are the vendors that could have been in route and their contract effective date. I have noted those contracts that would not resemble the template CenturyLink uses today. It's also important to note that our template is updated as needed and therefore may not exactly mirror the language in the contracts.

**CONFIDENTIAL INFORMATION HIGHLINGHTED WITHIN { }:**

{ } 1/22/09

{ } 11/9/99 – this contract language was based on { } language and does not match the template contract

{ } 5/27/10 – this contract was negotiated by legacy CenturyLink and does not match the template contract and the contract was later adopted by legacy QCC

{ } 7/31/06 – this contract was negotiated by legacy CenturyLink and does not match the template contract and the contract was later adopted by legacy QCC

{ [REDACTED] } 1/28/10 – this contract was negotiated by legacy CenturyLink and does not match the template contract and the contract was later adopted by legacy QCC.

{ [REDACTED] } 3/22/07 – this contract was negotiated by legacy CenturyLink and does not match the template contract and the contract was later adopted by legacy QCC.

{ [REDACTED] } 3/28/08 – this is a Legacy QCC contract but this contract language was based on { [REDACTED] } language and not on the template contract.

{ [REDACTED] } 6/9/2009 –this was a Legacy CenturyLink contract and does not match the template contract, however it was used by both via routing, and now legacy QCC has the same contract.

{ [REDACTED] } 2/22/10

{ [REDACTED] } 9/27/10 –this is a Legacy CenturyLink contract and does not match the template contract. It was later adopted for legacy QCC.

{ [REDACTED] } 8/16/11

{ [REDACTED] } 6/17/10

{ [REDACTED] } 3/6/13

{ [REDACTED] } 4/17/99 – this is a Legacy QCC contract and does not match the template contract, as it was negotiated from the { [REDACTED] } language. CenturyTel and Embarq also have their own contracts with { [REDACTED] }.

{ [REDACTED] } 2/24/11 – this is a Legacy CenturyLink contract and does not match the template contract, however, it was later adopted by legacy QCC.

{ [REDACTED] } 8/31/01 – this is a Legacy QCC contract and does not match the template contract because it was negotiated from the { [REDACTED] } language. Legacy CenturyLink has its own contract with { [REDACTED] }.

{ [REDACTED] } 4/22/08

{ [REDACTED] } 6/25/05

{ [REDACTED] } 10/16/09

{ [REDACTED] } 7/17/07

{ [REDACTED] } 8/12/08 – this is not a legacy QCC contract and does not match the template contract; it is a legacy CenturyLink contract.

{ [REDACTED] } 1/24/08 –this is a Legacy CenturyLink contract and does not match the template contract, but was used by both via routing; legacy QCC now has its own contract with { [REDACTED] }.

{ [REDACTED] } 7/21/11

{ [REDACTED] } 6/11/10

{ [REDACTED] } 11/9/07

{ [REDACTED] } Cancelled trial agreement before CSA was signed.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

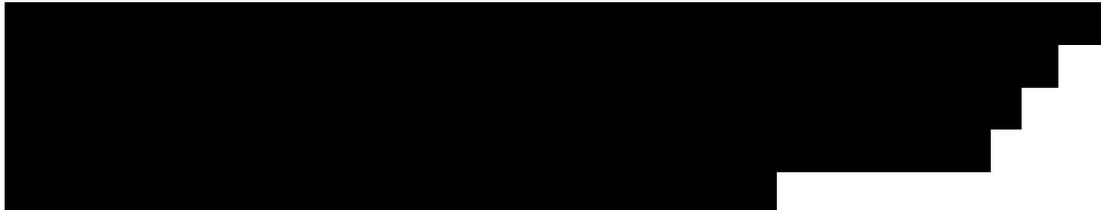
DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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19. For each of the underlying carriers identified in response to the above requests, please provide a complete listing of the tests that were conducted and the results, including the dates.

CenturyLink objects to this data request on the basis of relevancy and that the question is overly broad to the extent this question requests information not specifically related to the issues raised in this complaint.

**CONFIDENTIAL INFORMATION:**



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #19 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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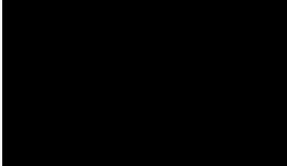
Supp. #19. This request asks, with respect to each of the underlying carriers identified in response to previous requests, for a complete listing of the tests that were conducted and the results, including the dates. We do not agree that the data request is properly objectionable. The Board’s docketing order states: “With respect to its use of underlying carriers, CenturyLink states that the carriers must pass testing and agree to metrics and are held accountable for not meeting the standards. . . . Also, while CenturyLink explains that it imposes performance requirements on its underlying carriers and states they must pass testing and agree to metrics and standards, the record does not disclose the specifics of any of that information. . . . The Board anticipates that further investigation would allow the Board to better understand what tools are available to carriers in Iowa to prevent the kinds of call completion problems alleged in the complaint and to respond to problems as they occur. These are only examples of the unanswered questions in this case; further investigation may identify other relevant questions.” The request seeks information that is highly relevant both on the question whether particular underlying carriers have engaged in practices that have resulted in calls not completing or calls of inferior quality and on the question whether CenturyLink has been sufficiently diligent in seeing that the problems are identified and corrected. The response states that the underlying carriers identified in response to previous requests have been in CenturyLink’s network for an extended period of time and that CenturyLink no longer maintains the initial testing results. For each of the underlying carriers identified in response to previous requests, please state when the carrier became a part of CenturyLink’s network and give the date or dates of the initial testing if known. For each such underlying carrier, please state whether CenturyLink has done any subsequent testing. If so, please provide a complete listing of the subsequent tests and the results, including the dates if known.

Response:

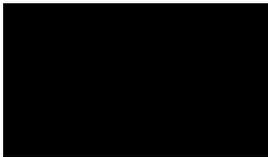
**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

This attachment is the carrier test plan developed for { [REDACTED] } that was followed in CenturyLink's testing with { [REDACTED] }. { [REDACTED] } was in the process of testing during the time of their trial agreements signed 11/20/2008 and 2/1/2010.

**ATTACHMENTS ARE CONFIDENTIAL INFORMATION:**



This confidential attachment is the generic test plan used in general for testing underlying carriers:



{ [REDACTED] } became an underlying carrier with CenturyLink (formerly Qwest Long Distance) when they successfully completed testing and signed their contract with us on June 17, 2010.

**CONFIDENTIAL**

**These pages (pages 3 through 6 of 6)  
contain Confidential Material**

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**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #19 – Supplemental**

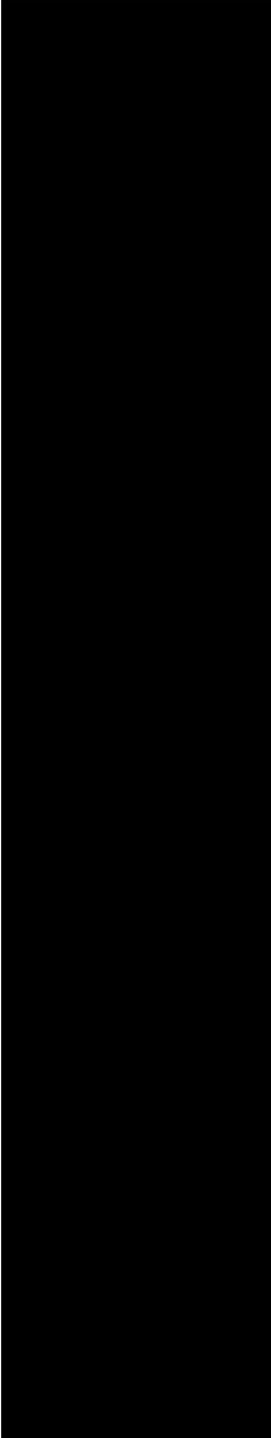
DATE : September 23, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #19. This request asks, with respect to each of the underlying carriers identified in response to previous requests, for a complete listing of the tests that were conducted and the results, including the dates. We do not agree that the data request is properly objectionable. The Board's docketing order states: "With respect to its use of underlying carriers, CenturyLink states that the carriers must pass testing and agree to metrics and are held accountable for not meeting the standards. . . . Also, while CenturyLink explains that it imposes performance requirements on its underlying carriers and states they must pass testing and agree to metrics and standards, the record does not disclose the specifics of any of that information. . . . The Board anticipates that further investigation would allow the Board to better understand what tools are available to carriers in Iowa to prevent the kinds of call completion problems alleged in the complaint and to respond to problems as they occur. These are only examples of the unanswered questions in this case; further investigation may identify other relevant questions." The request seeks information that is highly relevant both on the question whether particular underlying carriers have engaged in practices that have resulted in calls not completing or calls of inferior quality and on the question whether CenturyLink has been sufficiently diligent in seeing that the problems are identified and corrected. The response states that the underlying carriers identified in response to previous requests have been in CenturyLink's network for an extended period of time and that CenturyLink no longer maintains the initial testing results. For each of the underlying carriers identified in response to previous requests, please state when the carrier became a part of CenturyLink's network and give the date or dates of the initial testing if known. For each such underlying carrier, please state whether CenturyLink has done any subsequent testing. If so, please provide a complete listing of the subsequent tests and the results, including the dates if known.

Response:

Attached are Confidential test plans for the remaining carriers identified in previous data requests:





**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

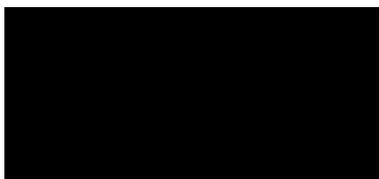
DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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20. For each of the underlying carriers identified in response to the above requests, please provide a complete listing of any measurements or results of the carrier's compliance or non-compliance with CenturyLink's performance requirements, metrics or standards, including the dates.

**CONFIDENTIAL INFORMATION:**

All of the information for this item is in the spreadsheet attached:





**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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21. For each of the underlying carriers identified in response to the above requests, does CenturyLink have any information that the carrier had previously failed to pay call termination charges on any call. If so, please provide complete details on all such failures, including the dates.

CenturyLink is not aware of any of our underlying carriers having previously failed to pay call termination charges. Our agreements with our underlying carriers require them to pay the terminating charges. Our template language includes the following:

**CONFIDENTIAL INFORMATION:**



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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22. What specific measures are available to CenturyLink as a means of holding underlying carriers accountable for not meeting standards? Please produce any documents that evidence these measures, including but not limited to any relevant contractual documents.

Contractual documents with individual carriers cannot be disclosed as disclosure would be a violation of the Nondisclosure Agreement (“NDA”) with each underlying carrier. To the extent that this data request asks for documents covered by such NDAs CenturyLink hereby objects.

The confidential template language quoted in CenturyLink’s response to Data Request #18 provides the contractual requirements that underlying carriers are obligated to meet.

However, in the incident involved here, the information provided and the testing performed indicated there was no underlying carrier fault, so no process measures were invoked.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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23. With respect to each of the available measures referenced above, has the measure been employed with respect to any of the underlying carriers identified in response to the above requests? If so, please provide all relevant details, including the dates.

CenturyLink objects to this data request on the basis of relevancy and that the question is overly broad to the extent this question requests information not specifically related to the issues raised in this complaint.

For this incident, since the information provided and the testing performed did not indicate that any underlying carrier was at fault, no process measures were invoked.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #23 – Supplemental**

DATE : September 23, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #23. This request asks, with respect to each of the measures available to CenturyLink as a means for holding underlying carriers accountable for not meeting standards, whether the measure has been employed with respect to any of the underlying carriers identified in response to prior data requests. We do not agree that the data request is properly objectionable. Whether or not responsive information is “specifically related to the complaint in this case,” the request seeks information that is highly relevant both on the question whether particular underlying carriers have engaged in practices that have resulted in calls not completing or calls of inferior quality and on the question whether CenturyLink has been sufficiently diligent in seeing that the problems are identified and corrected. Documents are not exempted from discovery merely because private parties have agreed to keep them confidential. On the contrary, parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter. Iowa R. Civ. P. 1.503(1); see *Whitley v. C.R. Pharmacy Service, Inc.*, 816 N.W.2d 378, 386 (Iowa 2012); see also *Harris v. Board of Governors of Federal Reserve System*, 938 F.2d 720, 723 (7th Cir. 1991) (“The rights of a party to obtain documents under judicial process are not enjoyed at the sufferance of third parties who have agreed between themselves to keep documents secret”). Please answer the question.

Response:

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

Due to a metrics review with the underlying carrier, { [REDACTED] } was removed from route for NPA/NXX 319/885.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : April 5, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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24. Please explain in detail the processes used by CenturyLink to address the failure of long distance calls to complete. Are these processes reduced to writing? If so, please produce all such writings.

The following is the CenturyLink process in use to address the issues raised to us regarding long distance call completion

- *Where there is an issue with the performance of our customer's long distance service, and they contact us, we open a trouble report ticket, the issue is determined and documented, and troubleshooting takes place.*
- *If the issue is related to routing, the route path is reviewed and may be changed, and tested for efficacy, to allow the customer's traffic to flow.*
- *If an underlying carrier is involved in the problem, they are removed from the path (NPA/NXX), and a ticket is opened with the underlying carrier – they must do root cause analysis, address the issue to resolution, take corrective action, test their fix, notify us, and test with us before we will re-instate them to be used for processing calls, and close our ticket with them.*
- *The original customer issue is worked, tested, confirmed with, and closed with, the customer.*

Yes, we have just described the process.

CenturyLink objects to this Data Request on the basis that it is overbroad and unduly burdensome in that it requests all “writings” related to the issue of internal processes and is not a request for a specific process document. Nevertheless, we have described above the complete process that CenturyLink uses to address the issues raised.

NOTE: In the event the response to this data request contains confidential information, do not simply mark the entire response or attached document(s) confidential. Please highlight, or otherwise identify, the specific information that is claimed to be confidential.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

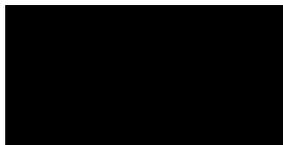
DATE : June 17, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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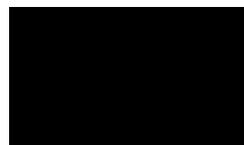
27. Please list the telephone numbers at the Waverly Health Center provided by CenturyLink. For each number listed, please give the PIC and LPIC history from and after January 1, 2010 to the present. Please provide for illustrative purposes a copy of the CenturyLink billing to the Waverly Health Center for October 2012.

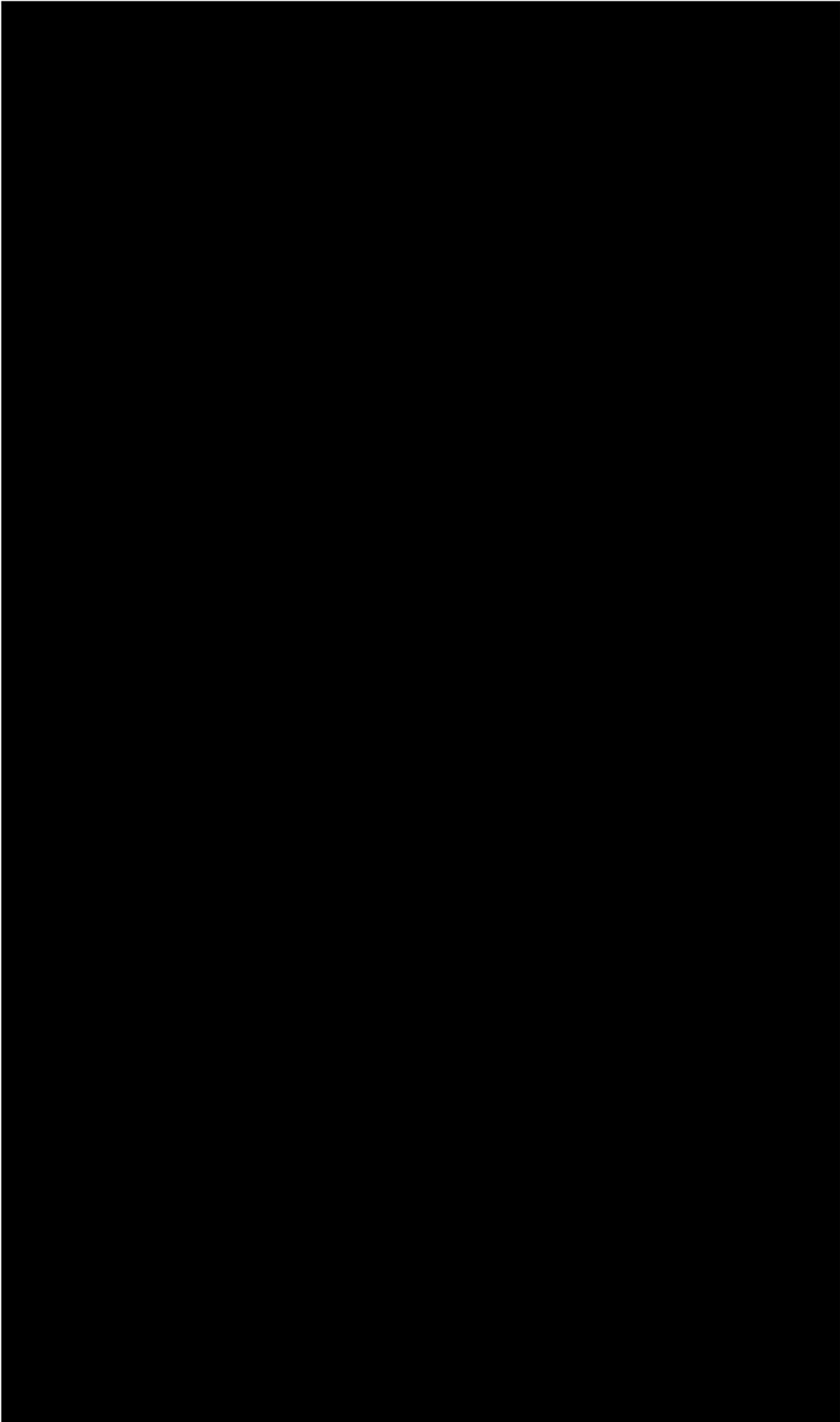
A list of the Waverly Health Center phone numbers and PIC/LPIC history from April 2011 is attached below. Information for the period of January 1, 2010 to April 2011 is not readily available.

**CONFIDENTIAL INFORMATION:**



**CONFIDENTIAL INFORMATION:**





**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST #27 – Supplemental**

DATE : August 21, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink  
WITNESS : Mary Retka

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Supp. #27. Why are there six different account numbers on the attached inventory? Does the attached billing include the charges for all six accounts?

Response:

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN {}**

[REDACTED]

Yes, the billing statement provided in CenturyLink's initial response to data request #27 covers the telephone numbers on the account.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : October 25, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink

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29. Please state whether any further changes have been made to the routing of calls and faxes to the Allison Rehabilitation Center or to NPA NXX 319-267 from and after October 8, 2012. If so, please describe the changes and produce all supporting documents.

RESPONSE: Attached is a confidential spreadsheet showing the intrastate routing for the NPA NXX 319-267 for the timeframe requested.

[REDACTED]

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : October 25, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink

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32. Please state whether CenturyLink has worked with { [REDACTED] } to address the issue that prompted removal of { [REDACTED] } from the routing of calls to the 319-267 NPA/NXX. If so, please relate all material portions of the discussions and state whether and if so what action has been taken as a result of the discussions. Please produce all supporting documents.

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

RESPONSE: As noted in previous responses, CenturyLink changed the routing of calls to the 319-267 NPA NXX “out of an abundance of caution”. CenturyLink’s investigation did not find any specific calls that failed during the original time period of the complaint; but did find calls that had duration. Because CenturyLink did not find failed calls, it decided to change the routing to { [REDACTED] } simply out of an abundance of caution. Therefore, there was no need to address issues with any underlying carriers as CenturyLink’s investigation did not find problems on its network. No discussions or documentation exist.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : October 25, 2013  
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COMPANY : CenturyLink

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33. Does CenturyLink have an understanding as to whether { [REDACTED] } or another underlying carrier, if subtended a call from CenturyLink, is able to avoid paying the INS tariffed tandem charge or the Dumont terminating charge or both, as referenced in CenturyLink's response to data request no. 5? If so, what is that understanding? If an underlying carrier is able to avoid paying these charges, but CenturyLink is not able to avoid paying these charges, what is CenturyLink's understanding as to the reason why one company is, but another is not, able to avoid paying these charges?

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

RESPONSE: CenturyLink has no specific understanding as to whether any of its vendors are able to avoid or actually are avoiding any terminating carrier's access charges, because CenturyLink does not have visibility into its vendor's networks and its vendors consider their own networks and termination routes confidential and proprietary. That said, CenturyLink does, as a standard practice and contractual requirement, make clear to its vendors that the traffic being sent for termination is toll traffic and CenturyLink expects its vendors to route such traffic in accordance with applicable law and that its vendors are responsible for paying appropriate termination charges for such traffic. As to a reason that any carrier may not pay access to INS for use of its tandem, it may be that a carrier has a direct connection to the applicable end office. This is of course permissible and even common in some instances. However, CenturyLink is, as stated above, without any specific knowledge with respect to { [REDACTED] } or any other vendor as to the specifics of its network.

**OFFICE OF CONSUMER ADVOCATE  
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35. Please produce, or provide the Iowa Utilities Board docket number or file number for, the PUC complaint discussed in the last row of the table provided in supplemental response to data request no. 13.

RESPONSE: The IUB File number for the complaint discussed is for this case C-2012-0129.  
The docket number is FCU-2012-0019.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : October 25, 2013  
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COMPANY : CenturyLink

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36. Please identify and explain the industry standards for post-dial delay referenced in the right bottom box of the first page of the table provided in supplemental response to data request no. 13.

RESPONSE: The CenturyLink PSTN switch network has set-up timers in the network. The timer parameter is set to 25 seconds, meaning that the switch will wait 25 seconds to receive a message from the far end to connect the call. SS7 industry standards allow for a range from 20-30 seconds. During the timer set up, the customer may experience a pause until the calls connect. As an example, a single ring-back tone is 6 seconds, so a post dial delay of 20 seconds would be equivalent to approximately 4 ring cycles.

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37. With respect to the trouble tickets dated June 8 and June 23, 2011, as shown in the supplemental response to data request no. 13, please explain what investigation was done, what conclusions were reached and what action was taken. Please produce all supporting documents.

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**

RESPONSE: In both cases, following CenturyLink's normal process, our technician opened a trouble ticket on behalf of our customer. The technician then investigated the issue raised. The technician determined that the calls were routing to { [REDACTED] }. { [REDACTED] } was not providing ring back as expected. Ring back is provided by the terminating end of the call. { [REDACTED] } was removed from the routing to this NPA NXX and a trouble ticket was opened with them on it. The technician continued to work with our customer to make sure calls could complete for them, including testing after the routing removal.

All the information related to these incidents is retained in the trouble tickets. There are no other supporting documents.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : October 25, 2013  
DOCKET NO. : FCU-2012-0019  
COMPANY : CenturyLink

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38. With respect to the trouble tickets dated June 8 and June 23, 2011, as shown in the supplemental response to data request no. 13, please explain the two routing changes that were made. Please give the date each change was made. Have these changes remained in place since the time they were made? If not, when did they cease to remain in place?

RESPONSE: The two routing changes made for post dial delay were made on July 5, 2011 and July 6, 2011. On October 1, 2012, CenturyLink made a permanent route change that currently remains in place. So, once the two routing changes removing the underlying carriers were done, they remained in place.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : September 3, 2013  
DOCKET NO. : FCU-2013-0004  
COMPANY : CenturyLink

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18. Please describe any sanctions that CenturyLink can impose on underlying carriers for failure to meet performance requirements, metrics or standards.

RESPONSE:

The following process is used to impose sanctions (removal from routing) on underlying carriers:

**CENTURYLINK'S STANDARD INVESTIGATION PROCESS:**

- Where there is an issue with the performance of a CenturyLink customer's long distance service, and the customer contacts CenturyLink, CenturyLink opens a trouble report ticket, the issue is identified and documented, and troubleshooting takes place.
- If the issue is related to routing, the route path is reviewed and may be changed and tested for efficacy to allow the customer's traffic to properly flow.
- If an underlying carrier is involved in the problem, it is removed from the path (NPA/NXX) and a trouble report ticket is opened with the underlying carrier. That carrier must conduct a root cause analysis, address the issue to resolution, take corrective action, test its fix, notify CenturyLink, and test with CenturyLink before CenturyLink will re-instate it to be used for processing calls and close the trouble report ticket.
- The original customer issue is worked, its resolution tested and confirmed, and it is closed with the customer.

**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

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COMPANY : CenturyLink

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19. Has CenturyLink imposed a sanction on an underlying carrier for failure to meet performance requirements, metrics or standards based in whole or part on calls or faxes placed to or from Iowa? If so, please identify each such carrier, the sanction, and the date the sanction was imposed.

RESPONSE:

**CONFIDENTIAL INFORMATION HIGHLIGHTED WITHIN { }:**



**OFFICE OF CONSUMER ADVOCATE  
DATA REQUEST**

DATE : September 3, 2013  
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COMPANY : CenturyLink

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22. Can CenturyLink offer the Iowa Utilities Board any assurances that the problems complained of by the Huxley Family Physicians will not recur in the future?

RESPONSE:

While CenturyLink's network, as well as any communications company's network, is not required to be engineered to guarantee the delivery of 100% of calls made on that network, CenturyLink can provide assurances that if similar issues to those in this complaint arise in the future, CenturyLink, following its standard processes, will address them promptly upon being notified and will take the necessary measures to fix any identified problems with its own network as well as with those underlying carriers used to augment the CenturyLink network.