

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

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<p>In re</p> <p>AMENDMENTS TO TELEPHONE SERVICE REGULATIONS [199 IAC 22]</p>	<p>DOCKET NO. RMU-2014-0003</p>
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**CenturyLink's Response to Informational Order and  
Request for Response**

CenturyLink welcomes and appreciates the Iowa Utilities Board efforts to review and modernize the rules regarding Telecommunication in the State of Iowa. CenturyLink believes that the Board and its Staff are well served by the solicitation of input from the industry and the examination of input previously provided in Docket NOI-2013-0001. CenturyLink urges the Board to evaluate potential rules revisions in light of the healthy competitive environment for communication services in Iowa today and the need to ensure the equal treatment of all providers of communication services to the businesses and citizens of Iowa.

Therefore, CenturyLink would urge the Board to include in its consideration of potential rule revisions the comments filed around this subject in Docket NOI-2013-0001. CenturyLink also encourages that Board to use the same process used in Docket NOI-2013-0001 to garner an open and engaging debate of needed changes to the current rules. That process involved the use of an industry workshop that proved to be both informative and focused. CenturyLink would encourage a similar approach to additional areas of Chapter 22 that may be subject to the changing communications industry going forward.

As to the current changes required by this year's Legislative action, CenturyLink is appreciative of the Board's note that the filed tariff doctrine will no longer make these customer service rules automatically binding on customers as well as the guidance on providing notice of rate changes to customers and to the Board. CenturyLink agrees that any current rules superseded by or inconsistent with Federal or State actions should

be promptly removed. However, beyond these, CenturyLink finds little need to begin to include other provisions in the rules that will be duplicative of the terms and conditions in CenturyLink's Catalog or Services and Fulfillment materials or only be binding on certain providers of voice service and not on others. The future addition of rules should take into account the impact of imposing rules on one segment of the providers of voice service and not on others. This inequity can be highlighted by the recent application of Cable One for a modification to its Video Franchise. In VCA-2014-0002 staff noted that Cable One is offering Voice communications in Iowa without a corresponding certificate<sup>1</sup>. This highlights the inequity apparent already in just one technology, VoIP. Whether through cable VoIP, non-nomadic VoIP, nomadic VoIP, cellular phone, satellite phone, wireline phone, whether through broadband, wireless or wired – one common thread is certain - all are providing a voice service directly to an end user.

Again, CenturyLink appreciates the opportunity to provide input to the Board on rule revisions that reflect the competitive marketplace and looks forward to participation in this process.

Dated: June 19, 2014

Respectfully submitted,  
By: /s/ *Becky Owenson Kilpatrick*

925 High Street, 9 S 9  
Des Moines, Iowa 50309  
Telephone: 515.286-7995  
Facsimile: 515.286.6128  
[becky.kilpatrick@centurylink.com](mailto:becky.kilpatrick@centurylink.com)

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<sup>1</sup>Gold Memo, Page 3, Analysis - Staff requests the additional time in order to determine the type of business model Cable One is using. In its Attachments to its initial application, Cable One states that it is the 10th largest cable company in the U.S. and offers residential and business consumers a wide range of services including phone service with free, unlimited long distance calling. Its website describes the phone services it offers residential and business customers, however, Cable One does not hold a CPCN. Staff notes that other cable companies providing local exchange service have obtained a CPCN. These include Cox Communications Omaha, LLC and Mediacom.

Based on staff's informal discussion with Cable One, it appears that Cable One does not believe its business model requires the procurement of a CPCN.