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FILED WITH
Executive Secretary

July 29, 2014

IOWA UTILITIES BOARD

Date: July 29, 2014

Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, RM 69
Des Moines, IA 50319-0069

RE: Qwest Communications Company, LLC. d/b/a CenturyLink QCC
Docket No. FCU-2013-0005

Dear Executive Secretary:

Please accept this informational filing relevant to the above mentioned docket consisting of CenturyLink's filing with the FCC and the acceptance of that filing by the FCC.

Please contact me with any questions.

Respectfully submitted,

/s/ Becky Owenson Kilpatrick

Becky Owenson Kilpatrick
Senior Corporate Counsel
CenturyLink

STATE OF IOWA

DEPARTMENT OF COMMERCE

UTILITIES BOARD

In re Hancock County Health Systems	**Docket No. FCU-2013-0005**

QWEST COMMUNICATIONS COMPANY D/B/A CENTURYLINK QCC'S INFORMATIONAL FILING REGARDING ADOPTION OF THE FCC'S SAFE HARBOR PROVISIONS

Qwest Communications Company, LLC d/b/a CenturyLink QCC (CenturyLink) respectfully submits this informational filing concerning CenturyLink's intention to adopt the Federal Communications Commission's ("FCC") Safe Harbor provisions in the Rural Call Completion Docket.[1] CenturyLink believes its filing with the FCC is very relevant to the issues raised in this docket and provides important information concerning CenturyLink's ongoing efforts to ensure that any potential for rural call completion issues are minimized. CenturyLink believes that the Iowa Utilities Board will welcome its adoption of the FCC's Safe Harbor polices. Attached as Exhibit A is CenturyLink's Petition for Waiver, which fully explains CenturyLink's qualifications for the Safe Harbor provisions, filed with the FCC on July 28, 2014.

Dated: July 29, 2014.

Respectfully submitted,

By:

/s/ Becky Owenson Kilpatrick (Admitted Pro Hac Vice)

[1] *In the Matter of Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, ¶¶ 85-100 (Adopted October 28, 2013; Released November 8, 2013).

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	**)**	
	)	**WC Docket No. 13-39**
Rural Call Completion	**)**	

PETITION FOR WAIVER

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July 28, 2014

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	WC Docket No. 13-39
Rural Call Completion	)	

PETITION FOR WAIVER

I. INTRODUCTION AND SUMMARY: CENTURYLINK IS COMMITTED TO QUALITY SERVICE.

CenturyLink is committed to quality service for all consumers, including those in rural communities. In the Commission's new rules on rural call completion[1] adopted earlier this year in this proceeding, the Commission hoped to encourage providers to adopt a "Safe Harbor" that provides for more streamlined reporting burdens for carriers that commit to specific call routing practices that will minimize potential call completion issues.[2] As a leader in nationwide communications, CenturyLink intends to adopt the Safe Harbor policies to help ensure the highest level of public confidence in its service. CenturyLink believes the Commission and all parties concerned about rural call completion issues should readily welcome CenturyLink's adoption of the Safe Harbor policies.

Implementing these new standards is not easy. CenturyLink processes over 3.8 billion minutes of long distance calls every month routed through 52 long distance switches and 3,675 local switches. Implementing the Safe Harbor requires complex changes to call routing and switch programming, revisions to intercarrier contracts, updates to routing tables, and necessary quality assurance testing. The new rules recognize that there may be technical constraints, and

[1] 47 C.F.R. §§ 64.2103-64.2105.

[2] *See Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154, ¶¶ 85-97 (2013) ("*Rural Call Completion Order*").

therefore include a provision for waiver of specific technical requirements where warranted.[3] In order to adopt the Safe Harbor policies, CenturyLink needs such a waiver for two limited circumstances involving only a very tiny percentage of covered calls.

Specifically, CenturyLink[4] respectfully requests a limited waiver of the call attempt recording, retention and reporting requirements in sections 64.2103-64.2105 of the Commission's rules solely for (1) calls that use Multi-Frequency ("MF") signaling and (2) intraLATA toll calls handed directly from the originating provider to the terminating provider. Both of these limited requests for waiver involve historical technology that is not designed for such reporting but still serves customers well. Both requests involve a very limited portion of CenturyLink's traffic and generating the information required by the rules would impose significant, unnecessary expense on the part of CenturyLink and terminating providers in order to overcome those technical limitations.

CenturyLink's request parallels portions of the limited waiver request filed by AT&T.[5] CenturyLink was one of the parties that supported AT&T's waiver petition and believes AT&T's full request should be granted.[6] CenturyLink, however, is not requesting any of the additional, more significant waiver relief sought by AT&T. Unlike AT&T, CenturyLink is not seeking authorization to utilize a statistically reliable sampling of calls for monitoring and reporting. CenturyLink will report data for all calls under the Safe Harbor provisions, subject to the waiver

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[3] *See Rural Call Completion Order* ¶¶ 95-97; *see also* 47 C.F.R. § 1.3. The Commission may exercise its discretion to waive a regulation where the particular facts make strict compliance inconsistent with the public interest. *See Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*citing WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)).

[4] CenturyLink, Inc. submits this request on behalf of its various operating affiliates.

[5] *See* Petition for Limited Waiver of AT&T Services Inc., WC Docket No. 13-39, filed April 10, 2014.

[6] *See* Comments of CenturyLink on Petition for Limited Waiver of AT&T Services, Inc., WC Docket No. 13-39, filed May 12, 2014 (CenturyLink Comments).

requests included here. Such data can provide the Commission, state authorities, and rural ILECs even greater confidence in the company's rural call completion practices.

CenturyLink's limited waiver request amply satisfies the considerations established by the Commission for a waiver in the Call Completion Rules and the requirements for waiver generally. There is good cause for the limited waiver and grant of CenturyLink's request is consistent with the Commission's rural call completion goals and with the public interest.

II. THE CALL COMPLETION SAFE HARBOR RULES ENVISION THAT SOME WAIVERS WILL BE NECESSARY.

On November 8, 2013, the Commission released a Report and Order and Further Notice of Proposed Rulemaking on rural call completion.[7] Under the new rules promulgated with the *Rural Call Completion Order*, "covered providers" must record and retain specified information for each inter- or intrastate long-distance call attempt (excluding toll-free).[8] "Covered providers" are providers of long-distance voice service -- including LECs, interexchange carriers, CMRS providers, and VoIP providers -- that make the initial long-distance call path choice for more than 100,000 domestic retail subscriber lines, counting the total of all business and residential fixed-line subscriber lines and mobile phones, aggregated over all of the providers' affiliates.[9] Covered providers are required to retain data for six months and to file quarterly reports with the Commission.[10]

Recognizing providers' legitimate concerns about new regulatory burdens, the Commission adopted the "Managing Intermediate Provider Safe Harbor" and a waiver process to

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[7] *See generally Rural Call Completion Order.*

[8] *See id.* ¶¶ 19-24; 47 C.F.R. §§ 64.2101-64.2105.

[9] *See Rural Call Completion Order* ¶¶ 20-23; 47 C.F.R. § 64.2101. Midcontinent Communications has requested a waiver of the definition of "covered provider" because it just barely exceeded the line threshold under the new rules. *See* Midcontinent Communications Request for Waiver of Rural Call Completion Rules, WC Docket No. 13-39, filed Jan. 23, 2014.

[10] *See Rural Call Completion Order* ¶¶ 61-64, 84; 47 C.F.R. § 64.2105.

ensure that the regulatory burden is appropriately tailored based on the conduct of the provider and targeted to achieve the Commission's objectives. Through this approach, the Commission "hope[s] to encourage providers to adopt practices and processes to prevent rural call completion problems from occurring in the first place."[11]

To address the significant burden of these new rules on covered providers, the Commission adopted a Safe Harbor and a waiver process that would appropriately moderate the requirements to record, retain and report call attempt data.[12] Under the Safe Harbor, a provider that, among other things, limits intermediate providers (not including terminating tandems) to no more than two in any call path would have to retain data for only three months and would be relieved of the requirement to file quarterly reports after one year.[13] In addition, the Commission authorized the Wireline Competition Bureau to grant additional waivers to significantly reduce the burdensome record retention and reporting requirements.[14] In reviewing waiver requests, the Bureau would consider whether the provider satisfies the Safe Harbor, implements industry best practices, and monitors its own performance on an ILEC-by-ILEC basis.[15]

On April 10, 2014, AT&T filed its Petition for a waiver of certain recordkeeping, recording and retention requirements of the *Rural Call Completion Order*.[16] AT&T explained that it meets the criteria to be considered for obtaining a waiver. In particular, AT&T satisfies

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[11] *Rural Call Completion Order* ¶ 97.

[12] *See id.* ¶¶ 85-97; 47 C.F.R. § 64.2107.

[13] *See Rural Call Completion Order* ¶¶ 86-94; 47 C.F.R. § 64.2107.

[14] *See Rural Call Completion Order* ¶¶ 95-97.

[15] *See id.* ¶ 96.

[16] *See Rural Call Completion Order.*

the Safe Harbor, implements industry best practices and monitors its own performance on an ILEC-by-ILEC basis.[17]

On May 12, 2014, CenturyLink filed comments supporting AT&T's waiver request.[18] In particular, CenturyLink supported AT&T's requested waiver of requirements for recording data related to calls that use MF signaling and to intraLATA toll calls handed directly from the originating carrier to the terminating provider. CenturyLink explained that it believed that "the Commission should grant waivers to other similarly situated carriers that make similar requests."[19] It added, "In the event CenturyLink elects to implement the safe harbor options identified in the *Order*, it anticipates that it would seek a similar waiver in the near future."

CenturyLink is in the process of implementing the Safe Harbor provisions in the *Order*. CenturyLink implements industry best practices, and it monitors its own performance on an ILEC-by-ILEC basis. CenturyLink therefore asks that the Bureau grant CenturyLink relief limited to these two discreet areas that were also included in AT&T's request. CenturyLink requests a limited waiver of the call attempt recording, retention and reporting requirements in sections 64.2103-64.2105 of the Commission's rules[20] for (1) calls delivered by MF signaling and (2) ILEC-to-ILEC intraLATA toll calls. CenturyLink does not seek waiver, as AT&T requested, to allow sampling of call completion data. Other than the exceptions of the two small waiver requests identified here, CenturyLink will provide full reporting and retention under the Safe Harbor rules. Its request is consequently much narrower than AT&T's petition.

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[17] *Id.* ¶ 96.

[18] *See* CenturyLink Comments.

[19] *Id.* at 3.

[20] 47 C.F.R. §§ 64.2103-64.2105.

III. CENTURYLINK SEEKS LIMITED WAIVER AND WILL IMPLEMENT SAFE HARBOR POLICIES.

The Commission may waive its rules, in whole or in part, for good cause,[21] and it is well established that the Commission may exercise its discretion to waive a regulation where the particular facts make strict compliance inconsistent with the public interest.[22]

Such is the case here. Because of technical realities within CenturyLink's systems as well as technical limitations in the signaling protocols required by certain terminating local providers, strict compliance with these two aspects of the Commission's new rules would require significantly increased requirements for data retention and manual workarounds to address (1) calls in which the terminating provider only accepts MF signaling and (2) ILEC-to-ILEC calls (calls that do not touch its long distance network).

As shown in detail below, CenturyLink satisfies all considerations for a waiver outlined by the Commission's rules, and it will retain and report data of calls to rural areas that will allow CenturyLink to monitor rural call completion on an OCN-by-OCN basis.[23] Granting CenturyLink this waiver is consistent with the public interest and warranted for good cause.

A. CenturyLink Qualifies for Safe Harbor Status.

The Commission required the Bureau to consider whether a provider has demonstrated that it qualifies for the Safe Harbor in evaluating a provider's waiver request.[24] Section 64.2107 requires a provider operating under the Safe Harbor to file one of two certifications, signed by an officer or director, annually on a quarterly filing date.[25]

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[21] 47 C.F.R. § 1.3.

[22] *See Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*citing WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)).

[23] *See Rural Call Completion Order* ¶ 86. OCN refers to "Operating Company Number."

[24] *Id.* ¶ 86.

[25] *See* 47 C.F.R. § 64.2107.

Under the first option, the covered provider certifies that it uses no intermediate providers. Under the second option, the covered provider must certify that (1) by contract, it limits the use of intermediate providers to two in the call path; (2) any nondisclosure agreement with the intermediate provider permits the covered provider to reveal the identity of intermediate providers in a call path to the Commission and the relevant rural ILEC; and (3) it has a process in place to monitor performance of intermediate providers.[26]

CenturyLink has one of the country's largest networks, but it cannot complete all calls nationwide without the use of some intermediate providers.[27] Consequently, CenturyLink will qualify under the second Safe Harbor option. The company is in the process of taking all necessary steps to be in a position to certify each of the elements necessary to demonstrate it meets the Safe Harbor requirements. Specifically, it is:

(1) identifying one intermediate provider to carry traffic on each call path;

(2) modifying its contracts with intermediate providers to ensure that each intermediate provider is aligned with the requirements of the order as it delivers calls to the terminating tandem or returns the call to CenturyLink for termination;

(3) to the extent necessary, modifying contracts to explicitly permit CenturyLink to continue its existing practice of identifying the identity of intermediate providers in a call path to the Commission and the relevant rural ILEC;

(4) modifying its call routing practices to comply with the Safe Harbor requirements; and

(5) reviewing its existing processes to monitor the performance of intermediate providers and making necessary changes to ensure that it is able to monitor their performance consistent with Commission rules.

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[26] Covered providers that file the second certification must describe the process they have in place to monitor the performance of their intermediate providers. *See* 47 C.F.R. § 64.2107(a)(2).

[27] CenturyLink also has appropriate arrangements with intermediate providers for network redundancy and reliability purposes.

As required by the rules, CenturyLink expects to file its certification on the first quarterly filing date and annually thereafter.[28] Thus, CenturyLink will qualify for the Safe Harbor and satisfies this consideration for a waiver under the rules.

B. CenturyLink Meets Call Completion Best Practices.

In addition to meeting the Safe Harbor requirements, a provider requesting a waiver of the rule must demonstrate that it has processes in place to ensure that call attempts to rural ILECs successfully reach their destinations, such as by adopting industry best practices.[29] CenturyLink meets this requirement. CenturyLink complies with and has been actively involved in development of call-completion best practices through ATIS.[30] Together, CenturyLink's company procedures and industry best practices ensure that no systemic routing problem exists and that, in the event an isolated problem is identified, CenturyLink can quickly and effectively resolve the issue. CenturyLink therefore satisfies the industry-best-practices consideration for a waiver.

C. CenturyLink Will Have Capabilities And Processes To Monitor Call Completion Performance, Subject Only To Very Limited Waiver Adjustment.

The Commission has also directed the Bureau to consider whether "the provider has demonstrated that it has capabilities and processes to monitor its own performance by the OCN of the called party's ILEC (rather than just at an aggregate level)."[31] CenturyLink has developed a comprehensive proposal to retain and report data of inter- and intrastate calls to rural and

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[28] If this waiver request is granted, CenturyLink expects to be ready to file a certification and appropriate reporting for calls completed in the first quarter of 2015, which may be consistent with the timeline under which the rules will be published in the *Federal Register*.

[29] *See Rural Call Completion Order* ¶ 96.

[30] *See* "Alliance for Telecommunications Industry Solutions, ATIS Standard on Intercarrier Call Completion/Call Termination Handbook," ATIS-0300106, available at https://www.atis.org/docstore/product.aspx?id=26780 (rel. Mar. 2013).

[31] *See Rural Call Completion Order* ¶ 96.

nonrural areas that will allow CenturyLink to monitor call completion on a rural OCN-by-OCN basis. CenturyLink proposes to proactively test call completion on an on-going basis. When the required systems development is complete, CenturyLink will collect and analyze the data on an ILEC-by-ILEC basis by rural OCNs. Under the terms of the Safe Harbor, CenturyLink will report the required data for one year and will retain data for three months.

Going forward, CenturyLink will continue to monitor call completion to rural areas on an OCN-by-OCN basis. In cases where CenturyLink uses intermediate carriers, it will continue to monitor its performance to ensure that no systemic rural call completion concerns arise and to quickly identify and resolve any issues that do occur.

i. CenturyLink Seeks Waiver Of Call Completion Rules For The Few Calls Using MF Signaling.

First, like AT&T, CenturyLink seeks a limited waiver of the rural call completion rules when using Multi-Frequency signaling. MF signaling is an old technology no longer used by major carriers but still used by some smaller rural ILECs. CenturyLink's entire network uses SS7 signaling. However, a very small percentage of terminating providers require that CenturyLink deliver traffic using MF signaling. In such a circumstance, the MF signaling information, mandated by the terminating LEC's requirement, does not provide CenturyLink with the data required by the FCC's rules. There are significant technical limitations associated with MF signaling,[32] and it does not support the capability to gather all elements of Call Attempt Records.[33]

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[32] *See* Comments of General Communication, Inc., WC Docket No. 13-39, at 3-5, filed Jan. 16, 2014. *Cf. Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, ¶ 716 (2011) (acknowledging technical limitations of MF signaling), *aff'd, In re: FCC 11-161*, Nos. 11-9900, *et al.*, 2014 U.S. App. LEXIS 9637, 2014 U.S. App. LEXIS 9633 (10th Cir. May 23, 2014), *petitions for rehearing en banc pending* (July 7, 2014).

[33] *See* 47 C.F.R. §§ 64.2103-64.2105.

As a result, for the small number of ILECs that require CenturyLink to deliver calls using MF signaling, CenturyLink seeks a waiver to the extent necessary from the reporting for calls using the MF signaling standard. CenturyLink estimates that such calls involve approximately 2% of the CenturyLink network.[34]

ii. CenturyLink Seeks Waiver Of Call Completion Rules For The Few Calls Handed Off LEC to LEC.

Second, CenturyLink seeks a waiver for intraLATA/interexchange toll traffic where CenturyLink's originating LEC hands the traffic directly to the terminating provider or where the CenturyLink LEC both originates and terminates the call. Like other carriers, CenturyLink's ILECs (and its affiliated CLECs) simply have no mechanism to track call attempt data for this category of traffic.

In order technically to comply with the rural call completion rules for these calls, CenturyLink would have to expend substantial resources on programming and retrofitting rapidly obsolescing equipment without any suitable business purpose. As a general rule, ILEC-to-ILEC traffic is typically not the source of any material rural call completion problems.[35] LECs generally do not utilize intermediate carriers for such calls.[36] And such traffic involves only a tiny percentage of CenturyLink's traffic. The company estimates that less than 1% of calls are delivered LEC-to-LEC.

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[34] CenturyLink calculates this number based on the number of affiliated LEC network connections required by other parties to use MF signaling. MF connections deliver signaling in addition to voice traffic (both local and long distance). CenturyLink expects that MF calls would therefore comprise a significantly smaller percentage of traffic than this 2% figure.

[35] Where the call is handed off to CenturyLink long distance, an underlying carrier may be used to process that call. Such calls are not within the scope of this waiver request.

[36] Where a CenturyLink LEC does utilize an intermediate carrier, it will be generally consistent with routing policies and practices adopted by its long distance operations, which will serve only to further reduce the potential for call completion concerns.

Given this, the burdens of strict compliance certainly would far outweigh the minimal incremental potential regulatory benefit from recording, retaining, and reporting data on this very small amount of traffic. At the same time, CenturyLink's adoption of Safe Harbor policies, by reducing reliance on intermediate carriers and streamlining call routing, should meaningfully reduce the potential for call completion complaints, including for intrastate or ILEC-to-ILEC calls.

As the Commission knows, the United States Telecom Association and The Independent Telephone & Telecommunications Alliance highlighted the difficulties identified with reporting such data. They did so in a Petition for Reconsideration of this very requirement, for the same reasons.[37] CenturyLink reiterates its support for the Associations' reconsideration petition, and a grant of that petition would presumably make this waiver unnecessary. CenturyLink includes this necessary relief in this limited waiver request in the event the petition is not granted or to the extent it is not granted by the effective date of the rules.

IV. CONCLUSION: CENTURYLINK'S LIMITED WAIVER REQUESTS SHOULD BE GRANTED, AND CENTURYLINK'S SAFE HARBOR CALL COMPLETION POLICIES WILL BRING BENEFITS TO CONSUMERS ACROSS THE COUNTRY.

CenturyLink's adoption of the Commission's Safe Harbor policies will benefit all consumers by helping reduce potential call completion issues in rural areas. By taking industry leadership in this area, CenturyLink's announcement should encourage other carriers to improve call routing practices. The company is incurring significant costs to implement these policies and will incur higher operating costs for long distance traffic. CenturyLink would hope the

[37] *See* Petition of USTelecom and ITTA for Reconsideration or, in the Alternative, for Waiver or Extension of Time to Comply, WC Docket No. 13-39, at 2, Jan. 16, 2014 (USTelecom/ITTA Petition) ("USTelecom and ITTA members estimate that to capture call attempt information for intraLATA interexchange/toll traffic as required by the Commission's rules would take at least 18 to 24 months to implement, and possibly longer, and cost the industry in excess of $100 million.").

Commission and other interested parties, including state regulatory authorities and rural ILECs, should welcome the company's commitment to quality service for all consumers, including those in rural communities.

CenturyLink's limited waiver request is very modest in scale. It involves at most only a very tiny percentage of rural calling. CenturyLink's limited waiver request is consistent with the conditions outlined in the new *Rural Call Completion* rules and with waiver standards generally.

Accordingly, CenturyLink respectfully requests a limited waiver of the Commission's rural call completion rules for the two narrow circumstances described above, in which strict compliance with the new rules is technically infeasible using currently deployed network equipment.

Respectfully submitted,

CENTURYLINK

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July 28, 2014

Your submission has been accepted

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Proceeding

Name	Subject
13-39	Rural Call Completion

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