

April 02, 2015

IOWA UTILITIES BOARD

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

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| In re Rehabilitation Center of Allison, Iowa, | Docket No. FCU-2012-0019 |
| In re Complaint of UnityPoint Clinic Family Medicine at Huxley, f/k/a Huxley Family Physicians, | Docket No. FCU-2013-0004 |
| In re Complaint of Hancock County Health Systems, | Docket No. FCU-2013-0005 |
| In re Complaints of Helen Adolphson and Charlotte Skallerup, and | Docket No. FCU-2013-0006 |
| In re Complaint of Douglas Pals | Docket No. FCU-2013-0009 |

**QWEST COMMUNICATIONS COMPANY D/B/A CENTURYLINK QCC'S
RESPONSE TO THE OFFICE OF CONSUMER ADVOCATE'S REPLY TO
CENTURYLINK'S RESPONSE TO OCA'S REPORT**

Qwest Communications Company, a Delaware limited liability company doing business as CenturyLink QCC ("CenturyLink")¹ respectfully submits its Response to the Office of Consumer Advocate's ("OCA") Reply to CenturyLink's Response to OCA's Report in this case.

CenturyLink understands that there is no provision in these dockets for a Response of this nature, but given the nature and tone of the OCA's Reply to

¹ During the pendency of this proceeding, Qwest Communications Company LLC d/b/a CenturyLink QCC underwent an internal reorganization approved by the Iowa Utilities Board in SPU-2014-0002 and subsequently received approval of a name change to CenturyLink Communications, LLC in SPU-2014-0008.

CenturyLink's most recent filing, CenturyLink believes it is necessary to respond with facts addressing its adoption of the FCC's Safe Harbor Provisions under the FCC's Rural Call Completion docket.² For that purpose, CenturyLink seeks leave of the Board to file this Response.

CenturyLink's Adoption of Safe Harbor

Contrary to the OCA's claims that the adoption of Safe Harbor is, in large part, simply to gain relief from long-term reporting requirements, CenturyLink believes it is far more of a long-term solution to the issues specifically occurring in these complaint proceedings before the Iowa Utilities Board, and in each and every state that CenturyLink provides long-distance services. Implementing Safe Harbor has been a difficult and expensive process, but CenturyLink is working to be an industry leader in routing quality. It is this work that the OCA minimizes in its attempts to justify the imposition of unduly burdensome and unnecessary requirements on CenturyLink, without recognizing the enormous endeavor that Safe Harbor requires of any company that adopts the requirements that Safe Harbor entails.³

CenturyLink provides this outline as to what the Company has had to complete in its efforts to implement the Safe Harbor requirements and to concretely address the concerns raised by these cases before the Board:

² *In the Matter of Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154, ¶¶ 85-100 (2013) ("*Rural Call Completion Order*").

³ The OCA also criticizes CenturyLink for failing to respond to its most recent data requests in a timely manner. CenturyLink legitimately objected to the data requests on the basis that they were unduly burdensome due to the fact that any employee capable of answering the OCA's demands was working long hours, seven days a week, to ensure that CenturyLink was ready for Safe Harbor by April 1, 2015, when the FCC's rules went into effect. CenturyLink would also point out here that discovery in these cases should be closed while the parties seek to propose solutions to the Board. The OCA has spent over two years investigating these cases and CenturyLink has responded to at least 170 data requests, plus follow-ups and supplemental responses, some of which required CenturyLink to hire temporary personnel to complete months of research. It is time to focus on outcomes.

1. Contracting – CenturyLink has taken a number of steps to address its contracts with intermediate carriers in order to ensure that the intermediate carriers can provide the reliable service necessary to complete calls to rural OCNs.

- a. CenturyLink has worked to augment and re-contract with Intermediate Carriers who can meet the Safe Harbor criteria CenturyLink has set to directly connect to the terminating OCN, to achieve CenturyLink's goal of a one-hop completion. It should be noted here that the Safe Harbor provisions allow up to two Intermediate Carriers in the routing of calls. CenturyLink has gone even further to reduce this number to one Intermediate carrier.
- b. CenturyLink has cancelled the contracts of those Intermediate Carriers who cannot meet our specific criteria and removed them from routing.
- c. Those Intermediate Carriers that will remain in routing have all contractually agreed that CenturyLink can disclose their identity when required.
- d. Intermediate Carriers that remain in route will also be traced for their performance by the processes that CenturyLink has in place to monitor the network.

2. Routing of Traffic:

- a. CenturyLink has augmented routes with the Intermediate Carriers who meet its Safe Harbor criteria, and tested the routing.
- b. CenturyLink has augmented its own routing systems and revised its routing tables.

- c. CenturyLink has augmented its routes by using its own facilities wherever possible.

3. Systems

- a. CenturyLink has established systems to provide ongoing (Monday through Friday) monitoring and testing of near real-time data to determine rural OCNs with ASR/NER⁴ issues and negative spikes, for analysis and testing.
- b. CenturyLink has repurposed equipment for use in anticipated future manual testing.

4. Processes

- a. CenturyLink has revised its trouble-ticketing process to more robustly analyze the issues, carefully analyze routing, and will work to address the issues in order to fix any problem for its customers appropriately; while also maintaining its ability to route calls in the Safe Harbor one-hop mode.
- b. CenturyLink has revised its processes for tracking network issues in order to accomplish our ongoing (Monday through Friday) monitoring and testing of near real-time data to determine rural OCNs with ASR/NER issues and negative spikes.
- c. CenturyLink has developed a detailed process for the gathering of the data needed for the FCC Form 480 report, population of the data,

⁴ ASR or Answer-Seizure Ratio is a measurement of network quality and call-success rates. It is the percentage of answered telephone calls with respect to the total call volume. NER or Network Effectiveness Ratio measures the ability of a network to deliver a call to the called terminus. Busy signals and other call failure due to user behavior are counted as successful call delivery for purposes of the NER calculation.

review and analysis of the results and preparation for sign off and filing of the report.

- d. CenturyLink has revised its process for meetings that discuss the performance of the Intermediate Carriers at scheduled monthly meetings.

5. Tracking

- a. In preparation for the start of data gathering for the quarterly reporting required by the Order, CenturyLink established processes to track the data.
- b. The same data that is used for reporting will also be used for tracking the performance of the Intermediate Carriers for the monthly meetings.

Conclusion

As has been demonstrated by the forgoing, CenturyLink has invested a lot of time and expense to implement Safe Harbor, to ensure it is a leader in routing quality, and to address issues raised in the rural call completion dockets at the FCC and in a number of states. This work deserves serious recognition in crafting any Iowa-specific solution imposed on CenturyLink. The OCA's blanket imposition of its nine-step solution on all long-distance carriers involved in these dockets fails to recognize CenturyLink's commitment to addressing rural call completion issues. As CenturyLink develops its suggested solutions, it hopes to provide additional detail to the outline provided in this filing. In light of its efforts, CenturyLink continues to hope this Board can craft a fair solution, specific to the situation of each long-distance carrier that serves Iowa consumers.

Dated: April 2, 2015

Respectfully submitted,

By:

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

/s/ David S. Sather

925 High Street, 9 S 9
Des Moines, Iowa 50309
Telephone: 515.243.5030
Facsimile: 515.286.6128
becky.kilpatrick@centurylink.com
davidsSather@gmail.com