

October 12, 2015

IOWA UTILITIES BOARD

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

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

RESPONSE TO OCA'S SUPPLEMENTAL REPORT

Qwest Communications Company, LLC, a Delaware limited liability company doing business as CenturyLink QCC ("CenturyLink")¹ submits this brief response to the Office of Consumer Advocate's ("OCA") Supplemental Report. CenturyLink concurs with the Response filed by Airus, Inc. today, October 12, 2015 including its conclusion that no interim solution need be proposed at this time in light of the Iowa Utility Board's intention to consider a further Notice of proposed rulemaking.²

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.

² See Airus Inc.'s Response to OCA's Supplemental Report, *In re* Complaints of Hancock County Health Systems, Docket No. FCU-2013-0005 and Carolyn Frahm, Docket No. FCU-2013-0007.

Further, CenturyLink does not believe that the steps proposed by the OCA recognize in any way what the individual carriers are doing to improve their call completion issues raised in these dockets or what the individual carriers are doing **pursuant to the Federal Communications Commission’s (“FCC”) Rural Call Completion Order**³. It is telling that none of the carriers involved in these dockets were willing to **reach a settlement with the OCA’s proposed solutions, even though the OCA “consolidated” its nine steps without altering the substance**⁴. In point of fact, the OCA’s proposed solutions are overreaching and plainly designed to impose maximum burdens on only a limited number of carriers in a field of many. In spite of the work some carriers have done to effectively address Call Completion issues in Iowa and across the country it contains no recognition of those efforts. If these measures are adopted, it may **well discourage other carriers from adopting the FCC’s Safe Harbor Provisions to the extent CenturyLink has.**

As noted in the conference held by Administrative Law Judge Christensen on August 26, 2015, CenturyLink explained the investment and effort it has made in **complying with the FCC’s Safe Harbor provisions, and pointed out that these efforts** have been largely successful in decreasing the number of customer complaints regarding call completion problems. Given these efforts, the extent of the proposed measures by the OCA are completely unwarranted.

³ *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*”).

⁴ Office of Consumer Advocate’s Supplemental Report, filed Oct. 9, 2015.

CenturyLink urges the Board to reject the OCA's proposal in its entirety.

Dated: October 12, 2015

Respectfully submitted,

By:

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