

**STATE OF IOWA**  
**DEPARTMENT OF COMMERCE**  
**UTILITIES BOARD**

**FILED WITH**  
**Executive Secretary**  
**February 19, 2016**  
**IOWA UTILITIES BOARD**

In re  COMPLAINT OF SUTHERLAND MERCY MEDICAL CLINIC	DOCKET NO. FCU-2014-0007
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**QWEST COMMUNICATIONS COMPANY, LLC D/B/A CENTURYLINK QCC'S  
PROPOSED SOLUTION TO RURAL CALL COMPLETION ISSUES**

Qwest Communications Company, LLC a Delaware limited liability company **doing business as CenturyLink QCC (“CenturyLink”)**<sup>1</sup> respectfully adopts its Proposed Solution to the rural call completion issues filed in Docket Nos. FCU-2012-0019, FCU-2013-0004, FCU-2013-0005, FCU-2013-0006 and FCU-2013-0009 on April 27, 2015 for filing in this case.<sup>2</sup> Because the underlying issues in this case are virtually identical to the underlying issues in the five referenced dockets, CenturyLink believes that this same proposal is appropriate in this case. As such, it will only provide this single proposal to **address the Board’s concerns.**

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<sup>1</sup> 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.

<sup>2</sup> See QWEST COMMUNICATIONS COMPANY D/B/A CENTURYLINK QCC'S PROPOSED SOLUTION TO RURAL CALL COMPLETION ISSUES, 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, Docket No. FCU-2013-0006; and In re Complaint of Douglas Pals, Docket No. FCU-2013-0009 filed on April 27, 2015.

## **CenturyLink's Adoption of Safe Harbor**

CenturyLink believes that the adoption of the FCC's Safe Harbor Requirements is the best long-term solution to the issues that specifically occurred in the call completion 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 an industry leader in routing quality as a result. 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.

CenturyLink has filed three quarterly Form 480 reports with the FCC, as required by their order, and each report has shown results indicating the benefits of **CenturyLink's adoption of Safe Harbor** handling for long distance calls. The adoption of the Safe Harbor, one-hop protocol has resulted in steep declines in complaints to **CenturyLink's long distance repair center involving call completion issues. Additionally, CenturyLink's implementation** of the near real-time proactive review of daily call completion results has also allowed CenturyLink to ensure its on-going watchfulness on long distance call completion with its underlying carriers in its Safe Harbor one-hop implementation. As a result of the near real-time proactive review of daily call completion results, CenturyLink has also noted that the unanswered call rate most often indicates that those unanswered calls are to unassigned or disconnected numbers, an indication that those are most likely robo calls.

CenturyLink has also updated its web site, on an on-going basis, to provide customers with clear information on the issue:

<http://www.centurylink.com/business/enterprise/blog/epicenter/centurylink-safe-harbor-in-a-stormy-world/>.

CenturyLink has continued its leadership in the ATIS forum focused on the issue of Long Distance Call Completion. That forum recently updated the Long Distance Call Completion/Call Termination best practices handbook, including new information and updates as needed.

**CenturyLink's most recent check of** its long distance repair database also shows no recurrence of the problems at the Sutherland Mercy Medical Clinic.

**CenturyLink believes that its adoption of the FCC's Safe Harbor requirements,** and especially in going further to provide a one-hop routing requirement, is the best solution to solving call completion concerns in Iowa. With **CenturyLink's rigorous** requirements, single-hop delivery and real-time monitoring of long distance calls on its networks to detect negative trends, CenturyLink believes that the issues that have arisen in these cases will be prevented in many instances and will certainly be addressed in a very timely manner in other instances. In addition, CenturyLink commits to maintain its leadership role at ATIS and adopting best practices in the industry as they are **relevant to CenturyLink's network.**

Dated: February 19, 2016

Respectfully submitted,

By:

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(Admitted Pro Hac Vice)*

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