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May 3, 2012

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Second Floor
Harrisburg, PA 17120

Re: Implementation of the Federal Communications Commission's Order of November 18, 2011 as Amended or Revised and Coordination with Certain Intrastate Matters - Docket No. M-2012-2291824

Dear Secretary Chiavetta

The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink ("CenturyLink") is in receipt of a supplemental filing made by AT&T on May 2, 2012 to its original comments (dated April 19, 2012) on the Commission's Proposed Access Reduction Template. CenturyLink is confused as to how AT&T believes it deserves another bite at this apple when the Commission's Order clearly defined the opportunity for comments. Given AT&T's supplemental filing, CenturyLink is compelled to respond.

AT&T was actively involved at the federal level and helped produce resultant Tariff Review Plans (TRPs) for use by Incumbent Local Exchange Carriers "to support the annual revisions to the rates in their interstate access service tariffs". See, FCC Order dated April 19, 2012 *I/M/O Material To Be Filed in Support of 2012 Annual Access Tariff Filings*. CenturyLink is on record as supporting use of the applicable FCC template for its May 15, 2012 tariff filing in Pennsylvania. In this regard, AT&T's May 2, 2012 proposed template does utilize as its basis the FCC-adopted template. However, AT&T now seeks to include an *additional* "Terminating Intrastate Carrier Charge (CC/Common Carrier Line (CCL) Calculation Worksheet." Effectively, AT&T's additional spreadsheet predetermines a methodology by requiring a split in the per line CC/CCL (as between originating and terminating) and then further requiring conversion to a per MOU charge.

CenturyLink objects to a requirement to provide any additional information beyond a split in the per line CC/CCL (as between originating and terminating). In particular, CenturyLink strongly objects to AT&T foisting a requirement to convert to a permanent CC/CCL per MOU-based charge. Once again AT&T engages the Commission and Pennsylvania parties in unnecessary work, distraction, and expense. CenturyLink is confident that the Pennsylvania Commission and Staff can readily address the upcoming tariff filings without the AT&T-orchestrated additional worksheet and conversion requirement.

CenturyLink urges the Commission and Staff to reject use of AT&T's Terminating Intrastate Carrier Charge (CC/Common Carrier Line (CCL) Calculation Worksheet requiring a per MOU conversion as set forth above. Should you have any questions, please do not hesitate to contact me.

Sincerely yours,



Sue Benedek

ZEB/jrh

cc: Parties on the Attached Certificate of Service (*via electronic mail*)
FCC Order Taskforce (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Implementation of the Federal Communications
Commission's Order of November 18, 2011 As
Amended or Revised and Coordination With
Certain Intrastate Matters

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Docket No. M-2012-2291824

CERTIFICATE OF SERVICE

I hereby certify that I have this 3rd day of May, 2012, served a true copy of the foregoing correspondence upon the persons below, via electronic mail, in accordance with the requirements of 52 Pa. Code §1.54:

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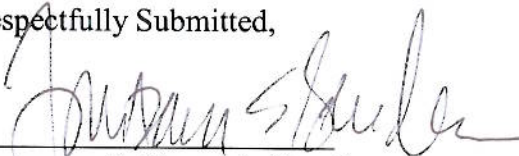
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Respectfully Submitted,



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