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April 19, 2012

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17101

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:

On behalf of The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink (hereinafter "CenturyLink"), enclosed please find CenturyLink's Comments to the Proposed Template.

Should you have any questions, please do not hesitate to contact me at (717) 245-6346 or David Bonsick at (717) 245-7747.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sue Benedek".

Sue Benedek

ZEB/jrh
enclosures

cc: Andrew Showers (*via electronic mail*)
Derek Volgelsong (*via electronic mail*)
Joe Spandra (*via electronic mail*)
All Parties on the Attached Certificate of Service (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | |
|--|---------------------------|
| _____) | |
| Implementation of the Federal Communications) | |
| Commission's Order of November 18, 2011 As) | Docket No. M-2012-2291824 |
| Amended or Revised and Coordination With) | |
| Certain Intrastate Matters) | |
| _____) | |

**COMMENTS OF THE UNITED TELEPHONE COMPANY
OF PENNSYLVANIA LLC D/B/A CENTURYLINK**

The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink (hereinafter "CenturyLink") applauds the Pennsylvania Public Utility Commission ("Commission") for taking a proactive role regarding implementation of the Federal Communication Commission's ("FCC") *Connect America Fund Order* ("*FCC Order*") and the transitioning of terminating intrastate switched access rates. Pennsylvania and other states have very important roles with implementation of this transition of intrastate terminating access charges, as set forth in the *FCC Order* as well as those changes still to come.

To this end, this Commission has not only initiated a separate proceeding to address issues related to the *FCC Order*, but now has also set forth its own rate calculation template. CenturyLink appreciates the Commission's effort. However, CenturyLink remains concerned that implementation of state-specific templates, such as proposed by the Commission, will create unnecessary work for the Commission and for the industry and may conflict with a similar effort occurring at the federal level relative to price cap carriers, such as CenturyLink.

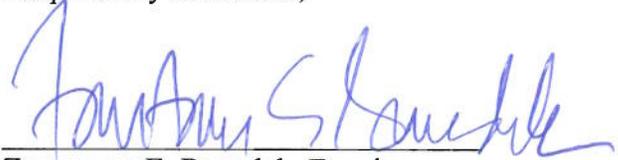
Specifically, CenturyLink and other federal price cap carriers have been working at the federal level with the FCC to develop a standard template to implement the specific calculations required by the *FCC Order* regarding terminating switched access reductions. CenturyLink has many affiliates operating in multiple jurisdictions. For multi-state carriers, such as CenturyLink, the *FCC Order* has foisted upon us significant tariffing requirements and rate calculation work to be completed in a relatively short period of time. Thus, it would be beneficial for CenturyLink to utilize a standard template – as being developed at the federal level – to be applied across the states. The purpose of using standard calculations and templates is to bring uniformity to state filings so as to better assist the affected carriers and state commissions, as well as to ensure that state-provided tariffs and calculations are consistent with the federal filings as addressed in the *FCC Order*.

CenturyLink respectfully urges the Commission to defer to the forthcoming standardized FCC rate calculation template and not move forward with implementation of the Commission's proposed template. CenturyLink believes the forthcoming template regarding price cap carriers will incorporate all necessary data and components for the Commission to validate that carriers have properly implemented the rate reductions required by the *FCC Order*. In the alternative, should the Commission decide to have its own template, the Commission should take necessary steps to ensure that its template is consistent with the template being developed at the federal level. To accomplish this, the Commission should either delay finalization of its template until after the FCC has released its final version (expected by the end of April) or, at the very least, the Commission should allow carriers to supplement their intrastate data with the data being required under the FCC template. Carriers should not be forced to also fill out the state template to the extent the same data is available in the forthcoming federal template.

With respect to the content and structure of the Commission's proposed templates, CenturyLink has identified at least one significant area in need of clarification. Specifically, neither the revenue spreadsheets nor the rate reduction spreadsheets separate out originating versus terminating data. The *FCC Order* is clear that the July 1, 2012 intrastate switched access reductions are for terminating access and certain transport elements only and, therefore, the Commission's template should be explicit that reductions in the carrier charge (or CC) are only applicable to the percentage of terminating revenues.

CenturyLink very much appreciates the opportunity to comment in this matter. CenturyLink looks forward to working with the Commission in the future to implement the *FCC Order*.

Respectfully submitted,



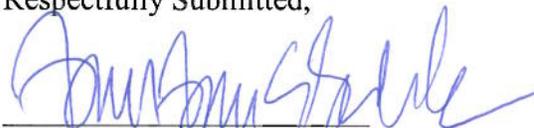
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Dated: April 19, 2012

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Eckert, Seamans, Cherin & Mellott, PC
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Respectfully Submitted,



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