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February 19, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Petition of Level 3 Communications, LLC For Designation as an
Eligible Telecommunications Carrier
Docket No. P- _____

Expedited Treatment Requested

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of Level 3 Communications, LLC ("Level 3") for designation as an Eligible Telecommunications Carrier ("ETC") in portions of the Commonwealth of Pennsylvania.

Level 3 is seeking ETC designation because it was awarded funds under the FCC's Rural Digital Opportunity Fund Phase I Auction (Auction 904) ("RDOF Auction"). Pursuant to the RDOF rules, The FCC's deadline for Level 3 to submit appropriate documentation of the ETC designation is June 7, 2021. In order for Level 3 to have sufficient time to plan its RDOF construction and deployment schedule and meet the FCC's RDOF deadline, Level 3 respectfully requests that the Commission grant Level 3's ETC designation on an expedited basis by no later than May 20, 2021.

Copies of the Petition have been served in accordance with the attached Certificate of Service. Should you have any questions, please feel free to contact me.

Respectfully submitted,

Zsuzsanna E. Benedek, Esq.
Attorney ID No. 60451
Counsel for Registrants

Enclosure
cc:Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of :
 :
Level 3 Communications, LLC : Docket No. _____
 :
Petition for Designation as an :
Eligible Telecommunications Carrier (ETC) :

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of February, 2021 copies of the foregoing Petition for Eligible Telecommunications Carrier Designation have been served upon the persons listed below in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Via Electronic Mail

Barrett Sheridan, Esquire
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Carl Yastremski
Frontier Communications of Breezewood, LLC
100 CTE Drive
Dallas, PA 18612
Carl.yastremski@ftr.com



Zsuzsanna E. Benedek
Attorney ID No. 60451

Dated: February 19, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of :
 :
Level 3 Communications, LLC : Docket No. _____
 :
Petition for Designation as an :
Eligible Telecommunications Carrier (ETC) :

**PETITION OF LEVEL 3 COMMUNICATIONS, LLC
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER**

Pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (“Act”) and the rules of the Federal Communications Commission (“FCC”),¹ and the requirements of the Pennsylvania Public Utility Commission (“Commission”),² Level 3 Communications, LLC (“Level 3” or “Petitioner”) submits this Petition for designation as an Eligible Telecommunications Carrier (“ETC”) in selected census blocks outside areas where its affiliate currently is an ETC.³ As addressed below, Petitioner respectfully requests expeditious treatment of this Petition. ***Specifically, Petitioner respectfully requests that the Commission issue an order designating Level 3 as an ETC in Pennsylvania by no later than May 20, 2021.***⁴

Level 3’s ultimate parent, CenturyLink, Inc. (n/k/a Lumen) (hereinafter “CenturyLink/Lumen”),⁵ was selected as a winning bidder in some of the census blocks available

¹ 47 U.S.C. § 214(e)(2). 47 C.F.R §§ 54.201 and 54.202.

² 52 Pa. Code § 69.2501. *See also*, 66 Pa. C.S. § 3019(f).

³ The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink operates as an Incumbent Local Exchange Company (“ILEC”) (hereinafter “United/CenturyLink”) in Pennsylvania.

⁴ This Petition seeks Commission action sufficiently in advance of the FCC’s date of June 7, 2021 for state commission action on ETC requests. The Commission currently has scheduled public meeting dates as follows: April 15, 2021, May 6, 2021, and May 20, 2021.

⁵ On September 14, 2020, CenturyLink, Inc., the ultimate parent of Petitioner, announced the launch of its “Lumen” brand. Effective September 18, 2020, the stock of CenturyLink, Inc. began trading under the symbol “LUMN.” On January 22, 2021, CenturyLink, Inc. formally changed its name to Lumen Technologies, Inc. As a result, CenturyLink, Inc. is now referred to as “Lumen Technologies,” or simply “Lumen.”

in the Commonwealth of Pennsylvania under the FCC's Rural Digital Opportunity Fund Phase I Auction (Auction 904) ("RDOF Auction").⁶ CenturyLink/Lumen relies upon its certificated affiliates for implementation of RDOF bids. In Pennsylvania, that affiliate, United/CenturyLink, is both a rural local exchange carrier and an ETC. Most of the RDOF census blocks won by CenturyLink/ Lumen fall within United/CenturyLink's authorized service area in Pennsylvania. A map is attached at **Exhibit A** illustrating all areas in Pennsylvania relevant to the CenturyLink/Lumen RDOF winning bids.⁷

Some of the RDOF Census Blocks won by CenturyLink/Lumen and assigned to United/CenturyLink fall outside of the authorized service areas of United/CenturyLink.⁸ There are 126 of these incremental RDOF census blocks ("Incremental CBs"), and they are listed in **Exhibit B**.⁹ As addressed in more detail below, Level 3 is already certificated by this Commission in these areas to offer, render, furnish or supply telecommunication services in Pennsylvania. Because Level 3 presently is not a designated ETC in Pennsylvania, however, Petitioner files this Petition to obtain ETC designation in the Incremental CBs.

Section 214(e)(2) of the Act authorizes the Commission to designate Petitioner as an ETC if it meets the requirements of 47 U.S.C. § 214(e)(1). The Commission's rules provide that ETC

⁶ *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced*, AU Docket No. 20-34, Public Notice, 35 FCC Rcd 13888 DA No. 20-1422 (OEA/WCB rel. Dec. 7, 2020) ("Auction 904 Results Notice"). See, <https://docs.fcc.gov/public/attachments/DA-20-1422A1.pdf>

⁷ The RDOF Census Blocks within the service territory of United/CenturyLink as denoted on Exhibit A are only for context and illustration purposes and are not subject to this Petition.

⁸ To the extent some of these areas fall both inside and outside United/CenturyLink service area, this Application addresses solely the portion outside of the United/CenturyLink service area. Similarly, if any of these areas nominally include areas inside the service area of an incumbent local exchange carrier subject to federal rate-of-return regulation, those areas were specifically excluded from the RDOF Auction and are not relevant here. *Rural Digital Opportunity Fund; Connect America Fund*, WC Docket Nos. 19-126, 10-90, Report and Order, FCC 20-5, 35 FCC Rcd 686 (2020) ¶ 12.

⁹ The other two incumbent local exchange carriers subject to federal price cap regulation in each of these Incremental CBs are: Verizon Pennsylvania Inc. ("Verizon") and Frontier Communications of Breezewood, LLC ("Frontier Breezewood").

petitions in the Commonwealth are to be evaluated under 47 U.S.C. § 214(e) and the relevant rules and Orders of the FCC.¹⁰ As addressed below, Level 3 meets the requirements for ETC designation for purposes of the FCC's RDOF Auction. Level 3 respectfully requests that the Commission expeditiously designate Petitioner as an ETC in the Incremental CBs for the limited purpose of fulfilling obligations pursuant to the RDOF.

I. BACKGROUND

1. Level 3, the Petitioner, is a Delaware limited liability company with principal offices located at 100 CenturyLink Drive, Monroe, Louisiana, 71203. Level 3 is an indirect, wholly owned subsidiary of CenturyLink/Lumen. Lumen provides high-quality voice and data services to enterprise, government, wholesale, and carrier customers over its IP-based network through its wholly owned indirect subsidiaries, including the Petitioner.

2. In Pennsylvania, Level 3, is authorized to provide facilities-based competitive local exchange, interexchange and competitive access services within Pennsylvania pursuant to authorizations granted by this Commission. Level 3 has authority to provide services in the territories of Verizon North, Inc. and Verizon Pennsylvania Inc., in accordance with certificates previously granted beginning at Docket No. A-310633F0002. Level 3 was thereafter granted authority to serve additional areas in Pennsylvania, including the territory of Frontier-Breezewood. A copy of the Commission's order and the certificate of public convenience relative to Frontier-Breezewood are attached at **Exhibit C**.

3. The FCC's RDOF program accelerates the deployment of high-speed fixed broadband service in America. Phase 1 of the RDOF program is being implemented with a focus on areas that are wholly unserved under the FCC's 25/3 Mbps standard for fixed broadband

¹⁰ 52 Pa. Code § 69.2501.

applicable to the RDOF Auction Phase 1 program. The FCC has authorized RDOF support to companies, like CenturyLink/Lumen, that commit to enable and maintain voice and broadband service meeting the FCC’s requirements to all locations (homes and small businesses) within the Incremental CBs for the life of the program.

4. In Pennsylvania, CenturyLink/Lumen was the winner in the RDOF Auction for areas with funding totaling approximately \$21.48 million, spread over 10 years.¹¹ United/CenturyLink was assigned those winning bids and it has filed the required Long-Form Application at the FCC.¹² If that application is approved, RDOF funding will begin to be disbursed for these areas in January 2022.

5. Pursuant to Section 214(e)(2) of the Act, a “State commission shall on its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission.”¹³

Section 214(e)(1) of the Act in pertinent part provides:

A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received –

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

¹¹ See, *Auction 904 Results Notice*, Attachment A: “Winning Bidders Summary” at page 6 of 30. The link for Attachment A is as follows: <https://docs.fcc.gov/public/attachments/DA-20-1422A2.pdf>.

¹² See generally, *FCC Form 683 Instructions*, OMB Control No. 3060-1256, “*Divide Winning Bids*” process.

¹³ 47 U.S.C. § 214(e)(2).

II. PETITIONER MEETS THE REQUIREMENTS FOR ETC CERTIFICATION

6. Level 3 meets the requirements for ETC designation for purposes of the FCC's RDOF program.

7. Level 3 is a common carrier, as defined under the Act,¹⁴ and plans to offer the services stipulated by RDOF in the Incremental CBs under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's or affiliate's facilities and services. Petitioner also plans to advertise the availability of such services and the charges using media of general distribution.

8. Pursuant to Section 54.101 of the FCC's rules, eligible voice telephony services include voice grade access to the PSTN or its functional equivalent.¹⁵ For RDOF Phase I support recipients, the FCC also defines the supported service as qualifying voice service and conditions grant of funding on the offering of qualifying broadband service.

9. For RDOF purposes, Petitioner, itself or through facilities and services of another carrier/affiliate, will provide voice service on a stand-alone basis in the Incremental CBs consistent with the FCC's high-cost universal service support rules applicable to it. Level 3 primarily will be provisioning voice telephony, where requested by a customer, using Voice-over-Internet Protocol ("VoIP") technology.¹⁶ Petitioner's telephony voice service will include access to emergency services (including 911 or E911 where available) to locations in the areas listed in

Exhibit B.

¹⁴ A "common carrier" is defined as "any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio[.]" 47 U.S.C. § 153(10).

¹⁵ 47 C.F.R. § 54.101(a).

¹⁶ *See*, 73 P.S. § 2251.4 - § 2251.6 (Voice-Over-Internet Protocol Freedom Act). Level 3 and its affiliates respectfully reserve all rights, claims and defenses relating to non-jurisdictional technologies that may be used to provision services under the RDOF Auction. Any reference to or use of such technologies herein should not be construed as a waiver of any rights, claims, and defenses that may be asserted in the future.

10. Petitioner will offer Lifeline discounts to qualifying low-income consumers in the Incremental CBs consistent with the FCC's Lifeline rules.¹⁷ Petitioner, through its affiliate United/CenturyLink, has substantial experience in providing Lifeline services and qualifying low-income consumers for Lifeline services.

11. Petitioner, itself or in conjunction with an affiliate, will advertise the availability of its Lifeline service offerings in the Incremental CBs using media reasonably designed to reach those likely to qualify for the service(s).

12. In Pennsylvania, entities requesting ETC designation also shall satisfy the Lifeline-related requirements as addressed by statute. 66 Pa.C.S. § 3019(f). Moreover, the Commission by regulation and orders has addressed various issues related to federal Lifeline and Link-Up programs.¹⁸

13. The Commission's regulation applicable for ETC designation and annual certification, 52 Pa. Code § 69.2501, in part provides:

(b) Petitions for designation as an ETC seeking low income support from Lifeline and Link-up America programs should satisfy the minimum standards established in 66 Pa.C.S. § 3019(f) (relating to lifeline service) and comply with the Commission's Lifeline and Link-Up Order, In Re: Lifeline and Link-Up Programs, Docket No. M-00051871, Final Order May 23, 2005, except that verifications should be submitted annually to Universal Service Administrative Company (USAC) on or before August 31 of each year. Petitions should affirm that the applying carrier will submit annual Lifeline Tracking Reports by June 30 of each year. The form is available on the Commission's web site at www.puc.state.pa.us, Online Forms, Telecommunications.

14. Petitioner confirms that it, individually or in conjunction with United/CenturyLink, will comply with the standards established in 66 Pa.C.S. § 3019(f). *See, Exhibit D*, attached

¹⁷ *See*, 47 C.F.R. §§ 54.101(c), 54.805-54.806.

¹⁸ 52 Pa. Code § 69.2501. *See, In Re: Lifeline and Link-Up Programs*, Docket No. M-00051871, Final Order, May 23, 2005. *See also, Final Policy Statement on Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an Eligible Telecommunications Carrier (ETC) for Purposes of Federal Universal Service Support*, Docket No. M-2010-2164741, (Aug, 2, 2010).

hereto and incorporated herein. Petitioner also affirms that it, individually or in conjunction with United/CenturyLink, will submit annual Lifeline Tracking Reports by June 30 of each year. In sum, Petitioner, in conjunction with teams at United/CenturyLink who have familiarity with the Lifeline programs, shall comply with applicable requirements associated with Lifeline and Link-Up programs relative to the Incremental CBs.

15. Regarding broadband service, RDOF support will enable the extension of gigabit per second broadband Internet access services to customers within the boundaries of the Census Blocks identified on **Exhibit B**.

16. Level 3 meets applicable federal and Commonwealth requirements for designation as an ETC in Pennsylvania, including 47 U.S.C. § 214(e), 47 C.F.R. §§ 54.201 *et seq.*, 66 Pa. C.S. § 3019(f), 52 Pa. Code § 69.2501, and this Commission's orders governing requirements for ETC designation in Pennsylvania.

17. Approval of this Petition will bring voice and broadband Internet access services to consumers in the Incremental CBs. Designating Level 3 as an ETC in the Incremental CBs will permit Petitioner to use RDOF funding for its intended purpose in the Incremental CBs, thereby directly advancing the goals of the RDOF program and universal service.

18. For the reasons set forth herein, granting ETC status to Level 3 for the Incremental CBs, as identified in **Exhibit B**, is in the public interest.

III. COMMUNICATIONS AND CORRESPONDENCE

19. Pleadings, orders, notices or other correspondence and communications regarding this Petition should be provided to:

Sue Benedek, Esquire
CenturyLink/Lumen
Associate General Counsel
240 North Third Street, Suite 300
Harrisburg, PA 17101
Tel: (717) 775-3088
E-mail: sue.benedek@lumen.com

And,

Joshua S. Motzer
CenturyLink/Lumen
Government Affairs Director
37 W. Broad St., Ste. 470
Columbus, OH 43215
Tel: (614) 441-0393
[Email: Josh.Motzer@lumen.com](mailto:Josh.Motzer@lumen.com)

IV. **REQUESTED RELIEF AND TIMING**

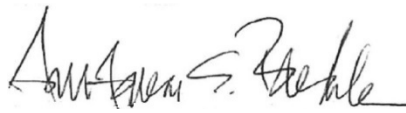
20. Petitioner must demonstrate to the FCC that it or an affiliate has been designated as an ETC in each of the census blocks where CenturyLink/Lumen was the winning bidder in the RDOF Auction. The FCC's deadline for such documentation is June 7, 2021.²³

21. Accordingly, Petitioner respectfully requests that the Commission issue an order approving this Petition by **no later than May 20, 2021**, which is the last Commission public meeting before June 7, 2021.

V. **CONCLUSION**

WHEREFORE, for the reasons stated herein, Petitioner, Level 3, respectfully requests that the Commission designate Level 3 as an ETC in the Incremental CBs identified in **Exhibit B** by no later than May 10, 2021 and order such other relief as may be appropriate.

Respectfully submitted,



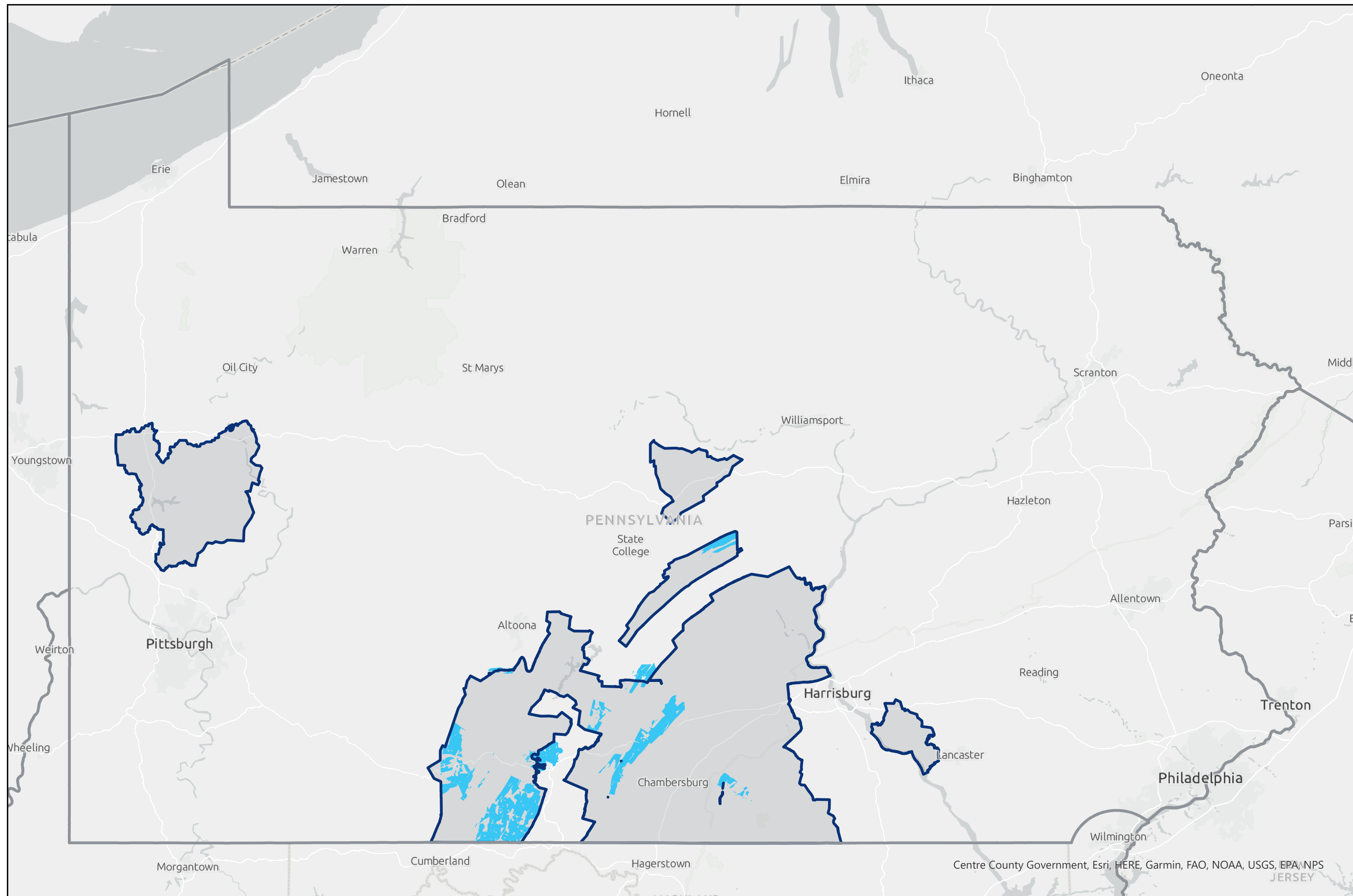
Zsuzsanna E. Benedek, Esquire
Counsel for Petitioner
PA Attorney ID: #60451
240 North Third Street, Suite 300
Harrisburg, PA 17101
Phone: (717) 775-3088
Email: sue.benedek@lumen.com

DATED: February 19, 2021

LIST OF EXHIBITS

- Exhibit A - Map of Total Incremental Census Blocks in PA relative to CenturyLink/Lumen RDOF winning bids
- Exhibit B - List of Incremental Census Blocks in PA relative to CenturyLink/Lumen RDOF winning bids
- Exhibit C - Copy of Certificate & Commission Order (CPCN) relative to Frontier-Breezewood
- Exhibit D – Confirmation of Compliance with 66 Pa. C.S. § 3019(f)

Pennsylvania Lumen Won RDOF Areas



Support (10y)	Locations
\$21,483,885.10	5,614

Winning Bidder

- Lumen Serving Area
- CenturyLink, Inc.

Winning bidder Rural Digital Opportunity Fund (RDOF) information: RDOF Source: <https://auctiondata.fcc.gov/public/projects/auction904>. Portions of the map data are ©2006-2020 TomTom and portions of the map data are ©2020 Lumen.

Exhibit B - List of Incremental Census Blocks in PA relative
to CenturyLink/Lumen RDOF winning bids

Census Block

420099605004000	420099605004082	420130115002003
420099605004005	420099605004083	420130115002007
420099605004006	420099605004084	420130115002009
420099605004007	420099605004085	420130115002018
420099605004008	420099605004086	420130115002021
420099605004011	420099605004087	420130115002022
420099605004012	420099605004091	420130115002023
420099605004014	420099605004092	420130115002024
420099605004015	420099605004093	420130115002025
420099605004016	420099605004096	420130115002026
420099605004020	420099605004098	420130115002027
420099605004033	420099605004099	420619510001001
420099605004038	420099605004101	420619510001002
420099605004039	420099605004107	420619510001004
420099605004042	420099605004120	420619510001005
420099605004043	420099605004124	420619510001006
420099605004045	420099605004129	420619510001007
420099605004046	420099605004146	420619510001011
420099605004048	420099605004153	420619510001013
420099605004049	420099605004156	420619510001015
420099605004050	420099605004165	420619510001022
420099605004051	420099606001151	420619510001023
420099605004052	420099606001154	420619510001030
420099605004053	420099606001156	420619510001033
420099605004054	420099606001157	420619510001035
420099605004063	420099606001198	420619510001038
420099605004065	420099606001229	420619510001057
420099605004067	420099609002003	420619510001058
420099605004068	420130115002002	

PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-2015-2517354

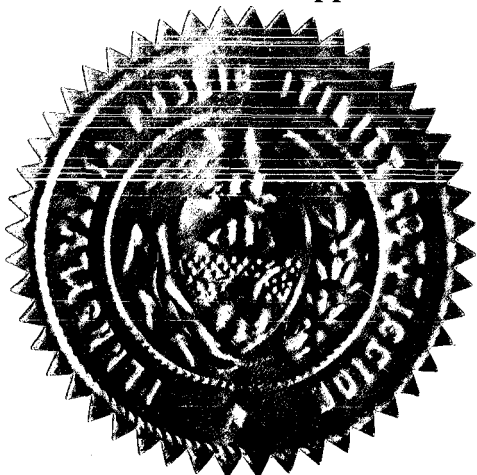
Application of Level 3 Communications LLC for the authority to furnish services as a Competitive Local Exchange Carrier within the service territory of North Penn Telephone Company in addition to Verizon Pennsylvania LLC; Verizon North LLC; Windstream Pennsylvania LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; The United Telephone Company of Pennsylvania d/b/a CenturyLink; Armstrong Telephone Company - North; Armstrong Telephone Company of Pennsylvania; Windstream Buffalo Valley, Inc.; Citizens Telephone Company of Kecksburg; Citizens Telecommunications Company of New York; Windstream Conestoga, Inc.; Windstream D & E, Inc.; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC; Frontier Communications of Pennsylvania, LLC; Ironton Telephone Company; Laurel Highland Telephone Company; The North-Eastern Pennsylvania Telephone Company; Consolidated Communications of Pennsylvania Company; Palmerton Telephone Company; Pymatuning Independent Telephone Company; and Lackawaxen Telecommunications Services, Inc.

EFFECTIVE DATE: March 22, 2016

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 22nd day, of March, 2016.


Secretary



**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held May 22, 2008

Commissioners Present:

Wendell F. Holland, Chairman
James H. Cawley, Vice Chairman
Tyrone J. Christy
Kim Pizzingrilli

Application of Level 3 Communications, LLC for expanded authority to Offer, Render,
Furnish or Supply Telecommunications Services as a Competitive Local Exchange
Carrier to the public in the Service Territories of:

Armstrong Telephone Company North	A-2008-2031943
Armstrong Telephone Company of Pennsylvania	A-2008-2031944
Buffalo Valley Telephone Company	A-2008-2031945
Citizens Telephone Company of Kecksburg	A-2008-2031946
Citizens Telecom Company of New York	A-2008-2031947
Conestoga Telephone & Telegraph Company	A-2008-2031948
Denver & Ephrata Telephone and Telegraph Company	A-2008-2031949
Frontier Communications of Breezewood, LLC	A-2008-2031950
Frontier Communications of Canton, LLC	A-2008-2031951
Frontier Communications of Lakewood, LLC	A-2008-2031952
Frontier Communications of Pennsylvania, LLC	A-2008-2031953
Ironton Telephone Company	A-2008-2031954
Laurel Highland Telephone Company	A-2008-2031955
The North-Eastern Pennsylvania Telephone Company	A-2008-2031956
North Pittsburgh Telephone Company	A-2008-2031957
Palmerton Telephone Company	A-2008-2031958
Pymatuning Independent Telephone Company	A-2008-2031959

ORDER

BY THE COMMISSION:

Before this Commission for review is an Application filed on February 28, 2008, of Level 3 Communications, LLC (Level 3, the Company, or the Applicant) to expand the service area for its Competitive Local Exchange Carrier (CLEC) authority into the service territories of the following Rural Local Exchange Companies (RLEC): Armstrong Telephone Company North; Armstrong Telephone Company of Pennsylvania; Buffalo Valley Telephone Company; Citizens Telephone Company of Kecksburg, Citizens Telecom Company of New York; Conestoga Telephone & Telegraph Company, Denver & Ephrata Telephone and Telegraph Company; Frontier Communications of Breezewood; LLC, Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC; Frontier Communications of Pennsylvania, LLC; Ironton Telephone Company; Laurel Highland Telephone Company; The North-Eastern Pennsylvania Telephone Company; Consolidated Communications of Pennsylvania Company, f/k/a North Pittsburgh Telephone Company¹; Palmerton Telephone Company and Pymatuning Independent Telephone Company (herein 17 RLECs) .

The Applicant is currently certified as a Competitive Local Exchange Carrier in the service territories of Verizon Pennsylvania Inc.; Verizon North Inc.; Windstream of Pennsylvania, Inc.; Frontier Communications Commonwealth Telephone, and The United Telephone Company of Pennsylvania d/b/a Embarq Pennsylvania. It is also certified as a Competitive Access Provider (CAP), an Interexchange Toll Facilities-Based Carrier and an Interexchange Toll Reseller (IXC).²

¹ North Pittsburgh Telephone Company was acquired by Consolidated Communications Holding, Inc., d/b/a Consolidated Communications of Pennsylvania Company, by Commission Order on December 5, 2007, at Docket No. A-312550F0002.

² See Docket Nos. A-310633, A-310633F0003, A-310633F0004, Certificates dated 5/21/1998; Docket No. A-310633F0002, Certificate dated 4/8/1999; and Docket No. A-310633F0002Am-A, Certificate dated 8/21/2003.

Copies of the Application were served upon the Office of Small Business Advocate, the Office of Consumer Advocate, and the 17 RLECs. As required by 52 Pa. Code §5.14, the Company's Application also was published in the *Pennsylvania Bulletin* and newspapers of general circulation serving the geographical territory affected by the application. The protest period for this instant Application expired April 21, 2008. No protests or petitions to intervene were filed and no hearings were held.

Information concerning the Applicant is as follows:

- Level 3 is a Delaware Limited Liability Company with its principal place of business at 1025 Eldorado Blvd., Building 2000, Broomfield, Colorado 80021, phone (720) 888-1000, fax (720) 888-5134.
- The Applicant complied with 15 Pa. C.S. § 8981 relating to a Foreign Limited Liability Company.
- The Applicant's registered office provider within Pennsylvania is CT Corporation System, Philadelphia, PA.
- The Applicant's Pennsylvania Emergency Management Agency contact is Steve Ulmer, Manager, Network Operations Center, 180 Peachtree St., 3rd Floor, Atlanta, GA 30303. Telephone: (404) 526-4480, Toll-Free (24-hour) 877-877-7758, email: Steve.Ulmer@Level3.com.
- Correspondence to resolve complaints may be directed to Level 3 Communications Customer Service: (877) 453-8353, at company headquarters.
- The Applicant will not be using a fictitious name.
- The Applicant has several affiliates within Pennsylvania: Broadwing Communications, LLC is authorized to provide IXC services pursuant to authority granted by the Commission at Docket No. A-310287 on May 22, 2003, and CLEC

and CAP services pursuant to authority granted by the Commission at Docket Nos. A-311258F0002 and A-311258F0003, respectively, on October 27, 2004. Looking Glass Networks, Inc. is authorized to provide telecommunications services as a CAP pursuant to authority granted by the Commission at Docket No. A-310996, issued on December 21, 2000. TelCove Operations, LLC is authorized to provide CLEC and IXC services pursuant to the Commission order issued at Docket No. A-310923. TelCove of Pennsylvania, LLC is authorized to provide CLEC and IXC services pursuant to order issued by the Commission at Docket No. A-310470.³ WilTel Communications, LLC is authorized to provide telecommunications services as a CLEC and an IXC pursuant to certificates issued by the Commission at Docket No. A-310690. WilTel Local Network, LLC is authorized to provide CAP services pursuant to a certificate issued by the Commission at Docket No. A-310905.

- The Applicant has no predecessors rendering public utility service outside Pennsylvania. Applicant does have affiliates rendering Public Service outside of Pennsylvania. Level 3 has affiliates operating in all 49 States and the District of Columbia. These affiliates provide a myriad of telecommunication services. The affiliates are: Level 3 Communications, LLC; Broadwing Communications, LLC; ICG Telecom Group, Inc.; Looking Glass Networks, Inc.; Progress Telecom, LLC; TelCove Operations, LLC; TelCove of Pennsylvania, LLC; TelCove of Virginia, LLC; WilTel Communications, LLC and WilTel Local Networks, LLC.

The Applicant understands that if it plans to cease doing business within the Commonwealth of Pennsylvania, it is under a duty to request authority from the Commission for permission prior to abandoning telecommunication services to its customers.

³ By Order issued March 2, 2007, in the dockets noted above, the Commission granted approval for TelCove Operations, Inc. to change its name to TelCove Operations, LLC and TelCove of Pennsylvania, Inc. to change its name to TelCove of Pennsylvania, LLC.

Level 3 does business in Pennsylvania as an Interexchange Toll Reseller, Interexchange Toll Facilities-Based Carrier, Competitive Access Provider and as a Facilities-Based and Reseller Competitive Local Exchange Carrier, as previously noted. Applicant is also authorized by the Federal Communications Commission to provide international and domestic interstate services as a non-dominant carrier. The Applicant and its affiliates have an extensive facilities-based network throughout Pennsylvania, including metro networks in Allentown, Altoona, Erie, Harrisburg, Lancaster, State College, Philadelphia, Pittsburgh, Scranton and York; a Network Operations Center in Coudersport and extensive facilities throughout other RLEC areas of the Commonwealth. Applicant also claims to have one of the world's most advanced, IP-optimized networks covering approximately 50,000 intercity route miles and offers a comprehensive portfolio of network offerings that spans Internet Protocol (IP) services, broadband transport, collocation services, and patented Softswitch-based managed modem and voice services. Applicant uses these network services as a foundation for delivering enterprise telecommunications solutions to customers in Pennsylvania.

The Company intends to expand the provision of its current CLEC services to commercial and residential customers located in exchanges served by 17 RLECs. Level 3 seeks authority to provide all forms of facilities-based and resold local exchange services which will allow its customers to originate and terminate local calls to other customers serviced by Local 3 as well as customers serviced by all other authorized local exchange carriers. Level 3 will also provide switched access services to interexchange carriers, which will allow Level 3 to originate and terminate intrastate and interstate toll calls made by its customers that are presubscribed to other interexchange carriers.

Local exchange services may include, but will not be limited to, the following: (i) local exchange access services to single-line and multi-line customers (including basic access lines, direct inward/outward trunk service, Centrex services, and ISDN); (ii) local exchange usage services to customers of Level 3's end user access line services; and (iii) switched and special carrier access services to other common carriers.

Level 3 currently offers services through a combination of purchased and leased assets and expects to continue to do so. Applicant's services will be available on a full-time basis – 24 hours a day, seven days a week.

Level 3 claims that it installs state-of-the-art telecommunications equipment and constructs fiber-optic network infrastructure that will provide trunking facilities to the incumbent local exchange carriers (ILEC) and other CLEC's. The fiber-optic network infrastructure is able to connect Level 3's network to major ILEC central offices and customers in the central business district and outlying areas of business concentrations in each market served. Level 3's network is also able to connect to ILEC tandem switches and certain IXC points of presence (POPs).

The Company provided a proposed tariff supplement to its competitive local service Tariff-Telephone Pa. P.U.C. No. 3 adding the 17 RLECs local exchanges and local calling areas using the existing rates, terms and conditions offered to current customers.

Consistent with our Order approving Sprint wholesale services,⁴ we shall require, as a condition of the grant of authority sought by Applicant, that a mandatory part of any contractual arrangement with a CLEC or other entity with whom Applicant contracts to provide service, is that the competitive service provider comply with all applicable Commission rules regarding universal service and consumer protections as are in existence and as may be hereafter amended. This condition shall apply until such time as this Commission eliminates this requirement. *See* 66 Pa. C.S. §§ 508; 1103.

⁴ See *Application of Sprint Communications Company L.P. for Approval of the Right to Offer, Render, Furnish or Supply Telecommunications Services as a Competitive Local Exchange Carrier to the Public in the Service Territories of Alltel Pennsylvania, Inc., Commonwealth Telephone Company and Palmerton Telephone Company*, Order entered December 1, 2006 at Docket No. A-310183F0002AMA, *et al.*

Issues affecting CLECs have been addressed and are being addressed in a number of Commission proceedings.⁵ A CLEC applicant is expected to adhere to the requirements relative to universal service programs, as initially set forth or as subsequently enlarged or modified.⁶ Also, per federal rules, CLECs are required to ensure the efficient usage of their numbering resources and are required to semi-annually report their utilization and forecast data to the North American Numbering Plan Administrator. See 47 C.F.R. §52.5 *et seq.* Any CLEC failing to comply with state commission orders related to numbering may be subject to the reclamation of their numbering resources, as well as fines pursuant to the Public Utility Code, 66 Pa.C.S. §3301. See *Implementation of Numbering Conservation Measures Granted to Pennsylvania by the Federal Communications Commission in its Order released March 31, 2000 – NXX Code Reclamation*, Docket No. M-00001373 (Order entered August 22, 2000), 30 *Pa. B.* 4701 (September 2, 2000)(Commission established process for reclaiming NXX codes from carriers who have failed to activate them within 6 months of their availability for assignment to customers.)

Further, Section 253(b) of the TA-96 permits a state commission to impose, on a competitively neutral basis and consistent with the Universal Service Section, requirements necessary to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunication services, and safeguard the rights of consumers. In response, we articulated explicit concerns relative to an applicant's financial fitness, tariff compliance, and rates.⁷

The Commission requires that Applicants seeking to provide local telecommunications services in Pennsylvania take steps to protect the public safety of consumers. One means of ensuring the public safety of consumers in the increasingly

⁵ See, e.g., *MFS, Intelenet, et al.*, Docket Nos. A-310203, F0002, *et al.*, (October 4, 1995; July 31, 1996; and August 7, 1997); *Pa. PUC v. Bell*, Docket No. R-00963578; *Pa. PUC v. GTE*, Docket No. R-00963666; *Global Order*, Docket Nos. P-00991648 and P-00991649; as well as other CLEC proceedings.

⁶ *Universal Service Invest.*, Docket No. I-00940035 (January 28, 1997).

⁷ *Blue Ribbon*, Docket No. A-310442 (April 25 and August 4, 1997).

competitive telecommunications marketplace is to ensure that new entrants provide their consumers with access to a seamless communications infrastructure for emergency services, such as 911. Therefore, in accordance with the notarized Affidavit, the Applicant avers that it contacted each county or municipal authority where it intends to provide CLEC telecommunications service and that arrangements are under way for the provisioning of emergency 911 service.

Prior to approving an application for authority to provide local telecommunications services in Pennsylvania, the Commission seeks to ensure the financial fitness of the Applicant. In this case, Applicant is a viable company currently doing business in the Commonwealth of Pennsylvania and is, by reason of past performance, considered capable of providing service to the public in the Commonwealth of Pennsylvania.

We conclude that the Applicant has met the requirements for expanded certification as a CLEC in the service territories of 17 RLECs consistent with this Order. Premised upon our review of the Application and the proposed tariff supplement, and consistent with our Orders, the Code, our Regulations and the TA-96, we conclude that the Applicant's proposed services do not raise concerns at this time regarding safety, adequacy, reliability, or privacy.

We further conclude that the Company has met the requirements for certification to provide CLEC services in the additional service territories requested, consistent with this Order and subject to the conditions originally imposed on the Company in conjunction with its original certificate of authority.

We note, however, deficiencies in the Company's proposed tariff supplement and shall therefore direct the Company to revise its proposed tariff

supplement in accordance with the changes noted in Appendix A of this Order.⁸ The Applicant shall thereafter file its tariff supplement reflecting the requested changes on or before thirty (30) days from the date of entry of this Order. Copies of the tariff supplement shall also be served upon the same entities receiving service of the original Application. If the time required for such resolution and filing exceeds thirty (30) days, the Applicant may request an extension of an additional thirty (30) days with the Commission's Secretary. Thus, if the tariff supplement is not filed within sixty (60) days (including the extension) of the entry of this Order, the Application will be dismissed and the authority granted herein will be revoked without further Commission Order. To the extent that the tariff supplement complies with all of the applicable requirements, the tariff supplement may become effective on one (1) day's notice from the date upon which it is filed and served.

Accordingly, we shall grant the Company's Application for extending its CLEC authority into the service territories of 17 RLECS. Upon the approval of the tariff supplement, additional certificates of public convenience shall be issued evidencing the Company's CLEC service territory expansion to include the service territories of 17 RLECS, consistent with this Order and our decisions in *MFS Intelenet, et al.*, Docket

Nos. A-310203, F0002, *et al.* (October 4, 1995; July 31, 1996; and August 7, 1997); and such other proceedings; **THEREFORE;**

IT IS ORDERED:

1. That the Application of Level 3 Communications, LLC for the expansion of its CLEC authority into the service territories of: Armstrong Telephone

⁸ David Ehrhart, (717) 783-6174, or davehrhart@state.pa.us, is the contact in the PUC's Bureau of Fixed Utility Services. Regardless of the review process, any tariff provision(s) inconsistent with the provisions of the Code, the TA-96, or our Regulations or Orders will be

Company North; Armstrong Telephone Company of Pennsylvania; Buffalo Valley Telephone Company; Citizens Telephone Company of Kecksburg; Citizens Telecom Company of New York; Conestoga Telephone & Telegraph Company; Denver & Ephrata Telephone and Telegraph Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC; Frontier Communications of Pennsylvania, LLC; Ironton Telephone Company; Laurel Highland Telephone Company; The North-Eastern Pennsylvania Telephone Company; Consolidated Communications of Pennsylvania Company f/k/a North Pittsburgh Telephone Company; Palmerton Telephone Company; and Pymatuning Independent Telephone Company is granted, consistent with this Order.

2. That the Company shall file the tariff supplement and serve the copies of the supplement on the entities receiving the Company's Application, consistent with this Order.

3. That the Company shall comply with all the provisions of the Public Utility Code, as now exist or as may be hereafter amended, and with all pertinent rules, regulations, and Orders of this Commission, now in effect or as may be prescribed by this Commission, including but not limited to: *MFS Intelenet, et al.*, Docket Nos. A-310203F0002, *et al.*; the *Universal Service Investigation*, Docket No. I-00940035; the *Global Order*, Docket Nos. P-00991648, *et al.*, and the *NXX Code Reclamation*, Docket No. M-00001373.

4. That the Company shall continue to make 711 abbreviated dialing available to access Telecommunications Relay Service and to arrange its switching equipment to translate these calls to the assigned toll-free number, (888) 895-1197, in

deemed inoperative and superseded.

order to route calls to the Telecommunications Relay Service Provider, in accordance with Commission's Order entered on February 4, 2000, at Docket No. M-00900239.

5. That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the Company, shall not be construed as conferring more than one operating right to the Company.

6. That the Company shall maintain accurate accounting records that segment its competitive local exchange carrier from other operations.

7. That if the Company has not, within sixty (60) days (including an approved extension) from the date of entry of this Order, complied with the requirements set forth herein, the Application may be dismissed without any further proceeding and the expanded authority granted herein revoked without further Commission Order.

8. That as a condition of the grant of the authority granted herein, Applicant shall include as a mandatory provision in any wholesale contract negotiated pursuant to the authority granted herein, that the competitive service provider comply with all applicable Commission rules regarding universal service and consumer protections as are in existence and, as may be hereafter, amended. That this condition shall continue until such time as this Commission eliminates this requirement.

9. That upon the approval of the tariff supplement, the Company will be granted additional Certificates of Public Convenience reflecting that the Company has the authority to furnish services as a Competitive Local Exchange Carrier within the service territories of: Armstrong Telephone Company North; Armstrong Telephone Company of Pennsylvania; Buffalo Valley Telephone Company; Citizens Telephone

Company of Kecksburg; Citizens Telecom Company of New York; Conestoga Telephone & Telegraph Company; Denver & Ephrata Telephone and Telegraph Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC; Frontier Communications of Pennsylvania, LLC; Ironton Telephone Company; Laurel Highland Telephone Company; The North-Eastern Pennsylvania Telephone Company; Consolidated Communications of Pennsylvania Company f/k/a North Pittsburgh Telephone Company; Palmerton Telephone Company; and Pymatuning Independent Telephone Company; in addition to the existing authority for Windstream of Pennsylvania, Inc., The United Telephone of Pennsylvania d/b/a Embarq Pennsylvania; Frontier Communications Commonwealth Telephone; Verizon North Inc., and Verizon Pennsylvania Inc., consistent with this Order.

BY THE COMMISSION,

James J. McNulty
Secretary

(SEAL)

ORDER ADOPTED: May 22, 2008

ORDER ENTERED: [May 29, 2008](#)

Level 3 Communications, LLC
Utility Code 310633
Expanded CLEC Authority

The proposed tariff supplement contains certain deficiencies that must be addressed by the Applicant before the tariff supplement can be approved and the Certificate of Public Convenience issued. **The Applicant must submit a copy of this Appendix with its revised compliance tariff supplement. On that copy please note the page/sheet of the compliance tariff where the required revision is located for each item below.**

<i>Page</i>	<i>CLEC Local Service Tariff Deficiency</i>
Title	<p>A revised Title Sheet <u>and</u> a Supplement Title Sheet are necessary. Revise as follows:</p> <p style="text-align: center;">Level 3 Communications, LLC Tariff-Telephone Pa. P.U.C. No. 3 Fifth Revised Title Page Cancels Fourth Revised Title Page</p> <p style="text-align: center;">COMPETITIVE LOCAL EXCHANGE CARRIER RESALE AND FACILITIES-BASED TARIFF Regulations and Schedule of Charges</p> <p>The Company will mirror the exchange area boundaries as stated in the tariffs of the Companies listed on Page 68 of this tariff.</p> <p>The Company's tariff is in concurrence with all applicable State and Federal Laws (including, but not limited to, 52 Pa. Code, 66 Pa. C.S. and the Telecommunications Act of 1934, as amended), and with the Commission's applicable Rules and Regulations and Orders. Any provisions contained in this Tariff that are inconsistent with the foregoing mentioned will be deemed inoperative and superseded.</p> <hr/> <p>Issued: (enter date) Effective: (enter date)</p> <p style="text-align: center;">By: OFFICER. Company Full Name ADDRESS1 ADDRESS2</p>
Supplement Title	<p>For the Body of the Supplement Title, duplicate the items shown above.</p> <p style="text-align: center;">Level 3 Communications, LLC Supplement No. 9 Tariff-Telephone Pa. P.U.C. No. 3</p>

Level 3 Communications, LLC
Utility Code 310633
Expanded CLEC Authority

<i>Page</i>	<i>CLEC Local Service Tariff Deficiency</i>
Modification Page Page No. 1A	Add: Addition of reference to RLEC Company Boundary Maps and their corresponding Tariff Nos. Page 68 1 st Revised.
Check Sheet	Add: Page 68* 1 st Revised
Original pages 42.1 thru 42.3	Put an additional 2 blank rows between the different Rural ILECs. Add references to current company names of incumbent local exchange carriers in the local calling area termination points.
Original Tariff Page 68 Make changes and then call it Page 68 1 st Revised cancels Original Page 68	Replace existing map language with the following: Company's service area maps will mirror those of and contained in the following companies tariffs: Verizon Pennsylvania Inc. Telephone Pa. P.U.C. Nos. 180A, 182, 182A, 185B and 185C; Verizon North Inc. Telephone Pa P.U.C. Nos. 1, 3, 5, and 6; United Telephone Company of Pennsylvania d/b/a/ Embarq Pennsylvania P.U.C. No. 27; Frontier Communications Commonwealth Telephone Pa P.U.C. Nos. 23 & 24; Windstream of Pennsylvania, Inc. Pa P.U.C. No. 1; Armstrong Telephone Company – North Pa P.U.C. No. 2; Armstrong Telephone Company of Pennsylvania Pa P.U.C. No. 10; Buffalo Valley Telephone Company Pa P.U.C. No. 7; Citizens Telephone Company of Kecksburg Pa P.U.C. No. 3; Citizens Telecom Company of New York Pa P.U.C. No. 2; Conestoga Telephone & Telegraph Company Pa P.U.C. No. 10; Denver & Ephrata Telephone and Telegraph Company Pa P.U.C. No. 15; Frontier Communications of Breezewood, LLC Pa P.U.C. No. 5; Frontier Communications of Canton, LLC Pa P.U.C. No. 3; Frontier Communications of Lakewood, LLC Pa P.U.C. No. 5; Frontier Communications of Pennsylvania, LLC Pa P.U.C. No. 14; Ironton Telephone Company Pa P.U.C. No. 2; Laurel Highland Telephone Company Pa P.U.C. No. 3; The North-Eastern Pennsylvania Telephone Company Pa P.U.C. No. 9; Consolidated Communications of Pennsylvania Company Pa P.U.C. No. 1; Palmerton Telephone Company Pa P.U.C. No. 5; and Pymatuning Independent Telephone Company Pa P.U.C. No. 5.

Exhibit D: The Commission's standards applicable for ETC designation and annual certification, 52 Pa. Code § 69.2501, in part provides:

(b) Petitions for designation as an ETC seeking low income support from Lifeline and Link-up America programs should satisfy the minimum standards established in 66 Pa.C.S. § 3019(f) (relating to lifeline service) and comply with the Commission's Lifeline and Link-Up Order, *In Re: Lifeline and Link-Up Programs*, Docket No. M-00051871, Final Order May 23, 2005, except that verifications should be submitted annually to Universal Service Administrative Company (USAC) on or before August 31 of each year. Petitions should affirm that the applying carrier will submit annual Lifeline Tracking Reports by June 30 of each year. The form is available on the Commission's web site at www.puc.state.pa.us, Online Forms, Telecommunications.

As to 66 Pa.C.S. Section 3019(f), Petitioner avers and provides:

- 1. All eligible telecommunications carriers certificated to provide local exchange telecommunications service shall provide Lifeline service to all eligible telecommunications customers who subscribe to such service.**

Level 3, in conjunction with teams provisioning such services for United/CenturyLink, shall provide Lifeline service to all qualifying customers who reside in the Incremental CBs and who wish to subscribe to its Lifeline service in Pennsylvania.

- 2. All eligible telecommunications customers who subscribe to Lifeline service shall be permitted to subscribe to any number of other eligible telecommunications carrier telecommunications services at the tariffed rates for such services.**

Level 3, in conjunction with teams provisioning such services for United/CenturyLink, shall permit qualifying Lifeline subscribers residing in the Incremental CBs to subscribe to other, available non-Lifeline services offered by Level 3 in the Incremental CBs at the standard rates or prices for such services in Pennsylvania.

- 3. Whenever a prospective customer seeks to subscribe to local exchange telecommunications service from an eligible telecommunications carrier, the carrier shall explicitly advise the customer of the availability of Lifeline service and shall make reasonable efforts where appropriate to determine whether the customer qualifies for such service and, if so, whether the customer wishes to subscribe to the service.**

Level 3, in conjunction with teams provisioning such services for United/CenturyLink, shall advise prospective customers of the availability of Lifeline service within the Incremental

CBs, as identified in Exhibit B to the Petition, and will establish protocols for determining whether such customers residing in the Incremental CBs qualify for and wish to receive Lifeline service.

- 4. Eligible telecommunications carriers shall inform existing customers of the availability of Lifeline services twice annually by bill insert or message. The notice shall be conspicuous and shall provide appropriate eligibility, benefits and contact information for customers who wish to learn of the Lifeline service subscription requirements.**

Level 3, in conjunction with teams provisioning such services for United/CenturyLink, shall inform existing customers who reside in the Incremental CBs of the availability of Lifeline services at least twice annually by bill insert or other message. Level 3's notification to those customers will be conspicuous and provide eligibility, benefit, and contact information for customers who wish to learn of the Lifeline service subscription requirements.

- 5. When a person enrolls in a low-income program administered by the Department of Public Welfare that qualifies the person for Lifeline service, the Department of Public Welfare shall automatically notify that person at the time of enrollment of his or her eligibility for Lifeline service. This notification also shall provide information about Lifeline service, including a telephone number of and Lifeline subscription form for the person's current eligible telecommunications carrier or, if the person does not have telephone service, telephone numbers of eligible telecommunications carriers serving the person's area that the person can call to obtain Lifeline service. Eligible telecommunications carriers shall provide the Department of Public Welfare with Lifeline service descriptions and subscription forms, contact telephone numbers and a listing of the geographic area or areas they serve, for use by the Department of Public Welfare in providing the notifications required by this paragraph.**

Level 3, in conjunction with teams at United/CenturyLink, shall provide to the Pennsylvania department of public welfare its Lifeline service descriptions, subscription forms, contact telephone numbers, and a listing of Incremental CBs that Level 3 serves.

- 6. No eligible telecommunications carrier shall be required to provide after the effective date of this section any new Lifeline service discount that is not fully subsidized by the federal universal service fund.**

Level 3 acknowledges that it shall not be required to provide any Lifeline service discount that is not fully subsidized by the federal universal service fund.

VERIFICATION

I, Thomas R. Freeberg, holding the position of Director Public Policy II at CenturyLink Communications, LLC, verify that the information provided in the foregoing Petition for Designation as an Eligible Telecommunications Carrier is true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unworn falsifications to authorities.



Thomas R. Freeberg
Director Public Policy II
CenturyLink Communications, LLC

Date: FEBRUARY 10, 2021