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March 1, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *In the Matter of Rates for Interstate Inmate Calling Services*,  
WC Docket No. 12-375

Dear Ms. Dortch:

Pursuant to the Commission's *Second Report and Order and Third Further Notice of Proposed Rulemaking*, released November 5, 2015, and the Public Notice of February 14, 2019, CenturyLink Public Communications, Inc. (CPCI) provides its response to the Second One-Time Mandatory Data Collection.<sup>1</sup>

CPCI submits its data under the terms of the Protective Order of December 19, 2013.<sup>2</sup> CPCI is designating certain information contained in the spreadsheets as Confidential and thus requests that it not be made available for public inspection. Each page of the non-redacted version of CPCI's spreadsheets is marked as follows: **"CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."**

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<sup>1</sup> *Rates for Interstate Inmate Calling Services*, WC Dkt. 13-275, Second Report and Order and Third Further Notice of Proposed Rulemaking, 30 FCC Rcd. 12763 (2015), *vacated and remanded in part*, Global Tel\*Link v. FCC, 859 F.2d 39 (D.C. Cir. 2017); Public Notice, DA 19-85 (Feb. 14, 2019).

<sup>2</sup> *Rates for Interstate Inmate Calling Services*, WC Dkt. 13-275, Protective Order, DA 13-2434 (Dec. 19, 2013).

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Attached to this letter, as requested in the instructions for the Mandatory Data Collection, CPCI is providing a Description and Justification to clarify or explain aspects of its data submission. The Description and Justification contains no confidential information.

CPCI is submitting the non-redacted version on a flash drive, while also providing two additional copies on flash drive, together with this cover letter and Description and Justification, to staff of the Wireline Competition Bureau.

Sincerely,

/s/ John E. Benedict

enclosure

cc: Lynne Engledow (non-redacted)  
Wireline Competition Bureau

### **Description and Justification**

CenturyLink Public Communications, Inc. (CPCI) provides this Description and Justification to support, explain and clarify the cost data and related information it has submitted in response to the Commission's Second Mandatory Data Collection. The information CPCI has submitted was obtained from CPCI's business records, including general ledgers and call detail records for the applicable time periods. In some instances, data was secured from a CPCI subcontractor.

### **Affiliates:**

CPCI is a wholly-owned subsidiary of CenturyLink, Inc., a holding company that is publicly traded on the New York Stock Exchange. CenturyLink, Inc. is an integrated communications company that provides a wide range of telecommunications and related services through more than one hundred local, regional, national and international operating companies. CPCI's response does not provide the top five affiliates in its spreadsheet, but attaches a list of all active CenturyLink, Inc. operating companies. CPCI is the only CenturyLink, Inc. affiliate receiving revenue from and incurring costs for the provision of Inmate Calling Services or services specific to correctional authorities.

### **Annual Revenues:**

CPCI does not have audited financial statements. It is attaching the annual Securities and Exchange Commission 10-K for its corporate parent, CenturyLink, Inc., for the years 2014-2017 and its public earnings release for 2018, as the 10-K is not yet available. CPCI notes that CenturyLink, Inc.'s 2018 revenues were \$23.44 billion, of which less than one percent was associated with Inmate Calling Services.

## **ICS Cost Data Assumptions:**

Total Direct Costs Related to Collect ICS Calls. Most costs for providing Inmate Calling Services are not tracked based on billing type. To provide an estimate of the costs attributed to collect calling, general costs were allocated to collect calling based on a percentage of revenue. These allocated costs were then added to the specific costs incurred while providing collect calling services.

Unpaid Calls. CPCI does not maintain specific databases to track the jurisdiction of Unpaid Calls or MOU in the ordinary course of its business. Calling jurisdiction is critical for the purpose of appropriate rating of paid calls; but otherwise unimportant to serving our clients with respect to unpaid calls. Unpaid call analysis is therefore presented on an aggregate basis.

Toll Expense. For all accounts where toll (per-minute) network services are provided through CenturyLink affiliates, costs are not tracked at a specific account level in the normal course of business. For these accounts aggregate toll expenses were tracked and allocated by minutes of use.

Shared Expense. Shared expenses such as regulatory fees and employee expenses were allocated to individual accounts based on a percentage of revenue.

Facility Addresses. The names and addresses of each facility within each client contract has been included for informational purposes. Costs have been provided on a system-wide rather than by-facility basis, as explained below.

Fees. Automated Payment Fees (APFs), Third Party Transaction Fees (TPTFs), and Credit Card Processing Services (CCPS) are assessed on end-users by CenturyLink billing agents. These fees are not reported in CPCI's submission to the degree they are not received by

the company; for clients where fees are not received by the Company they should be reported by our billing agents' submissions to this Data Request.

Cost of Capital. Costs are presented on an incremental basis only. For avoidance of argument regarding calculation drivers and assumptions, costs of capital have been omitted from the analysis; this exclusion will understate costs of service.

### **ICS Cost Data for Each Correctional Facility Served:**

CPCI is providing its confidential cost data by correctional system. In its data response, each facility within that correctional system reflects the costs developed for serving that contract. Most of the correctional systems CPCI serve have many facilities covered by their contracts; the company's contract with the Texas Department of Criminal Justice, for example, covers more than 100 facilities.

CPCI provides Inmate Calling Services through procurements conducted by state and local correctional authorities. It does not develop, and does not have, cost data specific to individual correctional facilities. Rather, it develops its cost data by correctional system, which is the manner by which its services are solicited, bid, and procured. In responding to a data request, a respondent is not expected to create wholly new data it does not maintain in the usual course of its business.

Artificially creating individual facility data for the Commission's data request would make no sense as a practical matter, as well. Correctional authorities issue procurements and seek bids on a consolidated system basis, not by individual facility. The effect is to help ensure that facilities that are higher cost to serve are not left either without service or with unduly expensive service. CPCI develops its internal cost data on a similarly consolidated basis, effectively pooling high cost and low cost facilities. If services were procured by individual

facility, or costs were otherwise developed by individual facility, actual costs would vary widely if they were procured separately.

If, in developing the one-time data request, some at the Commission may have intended respondents to create cost data by facility, in order to further the Commission’s development of regulation of intrastate Inmate Calling Services, the rationale is obsolete after the D.C. Circuit’s ruling. *Global Tel Link v FCC*, 859 F.3d 39 (D.C. Cir. 2017) (finding FCC lacked authority over intrastate services and had acted arbitrarily and capriciously in its treatment of certain costs of service).

The FCC’s burden estimate for this data collection provided to the Office of Management & Budget is just 100 hours per respondent. That estimate confirms that respondents are not expected to manufacture data other than what they have maintained in the usual course of business.

**Video Visitation:**

CPCI’s response does not include data for off-site or on-site video visitation services. The U.S. Court of Appeals for the D.C. Circuit disallowed reporting requirements related to video visitation services as “too attenuated to the Commission’s statutory authority.” *Global Tel Link v FCC*, 859 F.3d 39, 59 (D.C. Cir. 2017).

**CENTURYLINK, INC.  
Affiliate List of Subsidiaries**

| <b><u>Subsidiary</u></b>                            | <b><u>State or<br/>Jurisdiction of<br/>Incorporation</u></b> |
|---|--|
| Actel, LLC  | Delaware   |
| Bloomington Telephone Company, Inc.                 | Michigan   |
| Century Cellunet International, Inc.                | Louisiana  |
| Cellunet of India Limited                           | Mauritius  |
| Century Telephone of West Virginia, Inc.            | West Virginia  |
| CenturyLink – Clarke M. Williams Foundation         | Colorado   |
| CenturyLink Communications, LLC                     | Delaware   |
| Cognilytics, Inc.                                   | California   |
| Cognilytics Software and Consulting Private Limited | India  |
| ElasticBox, Inc.                                    | Delaware   |
| netAura, LLC  | Delaware   |
| Qwest International Services Corporation            | Delaware   |
| CenturyLink do Brasil Participações Ltda.           | Brazil   |
| CenturyLink Comunicações Ltda.                      | Brazil   |
| SAVVIS do Brasil Ltda.                              | Brazil   |
| Savvis Telecomunicações Ltda.                       | Brazil   |
| Qwest N Limited Partnership                         | Delaware   |
| Qwest Transoceanic, Inc.                            | Delaware   |
| Qwest Communications International Ltd.             | United Kingdom   |
| CenturyLink Limited                                 | United Kingdom   |
| CenturyLink Austria GmbH                            | Austria  |
| Qwest Holdings, BV                                  | Netherlands  |
| CenturyLink Belgium Sprl                            | Belgium  |
| Qwest France SAS                                    | France   |
| Qwest Germany GmbH                                  | Germany  |
| Qwest Netherlands BV                                | Netherlands  |
| Qwest Peru S.R.L.                                   | Peru   |
| Qwest Telecommunications Asia, Limited              | Hong Kong  |
| CenturyLink Technology Australia Pty Ltd            | Australia  |
| CenturyLink Corporation Japan                       | Japan  |
| Qwest Communications Korea, Limited                 | Korea  |
| Qwest Hong Kong Telecommunications, Limited         | Hong Kong  |

|   |             |
|---|-------------|
| CenturyLink Technology Singapore Pte. Ltd.              | Singapore   |
| Qwest Taiwan Telecommunications, Limited                | Taiwan      |
| SEAL Consulting, Inc.                                   | New Jersey  |
| AppFog, Inc.  | Delaware    |
| CenturyLink Europe B.V.                                 | Netherlands |
| CenturyLink Europe B.V., The Netherlands, filial Sweden | Sweden      |
| CenturyLink Europe B.V., Sucursal en España             | Spain       |
| CenturyLink France S.A.S.                               | France      |
| CenturyLink Italia S.r.l.                               | Italy       |
| CenturyLink Philippines, Inc.                           | Philippines |
| CenturyLink Poland Sp Zo.o.                             | Poland      |
| CenturyLink Switzerland A.G.                            | Switzerland |
| CenturyLink Taiwan Limited                              | Taiwan      |
| CenturyLink Technology Hong Kong Limited                | Hong Kong   |
| CenturyLink IT Consulting (Shanghai) Co., Ltd.          | China       |
| Digital Savvis HK JV Limited                            | British VI  |
| Digital Savvis HK Holding 1 Limited                     | British VI  |
| Digital Savvis Investment Management HK Limited         | Hong Kong   |
| Digital Savvis Management Subsidiary Limited            | Hong Kong   |
| CenturyLink Technology Malaysia Sdn. Bhd.               | Malaysia    |
| CenturyLink (Thailand) Limited                          | Thailand    |
| DataGardens, Inc.                                       | Canada      |
| SAVVIS Argentina S.A.                                   | Argentina   |
| SAVVIS Communications Chile, S.A.                       | Chile       |
| SAVVIS Federal Systems, Inc.                            | Delaware    |
| SAVVIS Communications International, Inc.               | Delaware    |
| CenturyLink Korea Limited                               | Korea       |
| SAVVIS Communications Private Limited                   | India       |
| SAVVIS Mexico, S.A. de C.V.                             | Mexico      |
| Tier 3, Inc.  | Washington  |
| Egnyte, Inc.  | Delaware    |
| Wam!Net Japan K.K.                                      | Japan       |
| CenturyLink of Louisiana, LLC                           | Louisiana   |
| CenturyTel of Adamsville, Inc.                          | Tennessee   |
| CenturyTel of Arkansas, Inc.                            | Arkansas    |
| CenturyTel Broadband Services, LLC                      | Louisiana   |



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|---|------------|
| CenturyTel TeleVideo, Inc.                | Wisconsin  |
| CenturyTel/Teleview of Wisconsin, Inc.    | Wisconsin  |
| Qwest Broadband Services, Inc.            | Delaware   |
| CenturyTel Broadband Wireless, LLC        | Louisiana  |
| CenturyTel of Central Indiana, Inc.       | Indiana    |
| CenturyTel of Chester, Inc.               | Iowa       |
| CenturyTel of Claiborne, Inc.             | Tennessee  |
| CenturyTel Holdings, Inc.                 | Louisiana  |
| Century Marketing Solutions, LLC          | Louisiana  |
| CenturyTel Arkansas Holdings, Inc.        | Arkansas   |
| CenturyTel of Central Arkansas, LLC       | Louisiana  |
| CenturyTel of Northwest Arkansas, LLC     | Louisiana  |
| CenturyTel Holdings Alabama, Inc.         | Alabama    |
| CenturyTel of Alabama, LLC                | Louisiana  |
| CenturyTel Holdings Missouri, Inc.        | Missouri   |
| CenturyTel of Missouri, LLC               | Louisiana  |
| CenturyTel Investments of Texas, Inc.     | Delaware   |
| CenturyTel of the Northwest, Inc.         | Washington |
| Brown Equipment Corp.                     | Nevada     |
| Carter Company, Inc.                      | Hawaii     |
| Cascade Autovon Company                   | Washington |
| CenturyTel/Cable Layers, Inc.             | Wisconsin  |
| CenturyTel of Central Wisconsin, LLC      | Delaware   |
| CenturyTel of Colorado, Inc.              | Colorado   |
| CenturyTel of Eagle, Inc.                 | Colorado   |
| CenturyTel of Eastern Oregon, Inc.        | Oregon     |
| CenturyTel Entertainment, Inc.            | Washington |
| CenturyTel of Fairwater-Brandon-Alto, LLC | Delaware   |
| CenturyTel of Forestville, LLC            | Delaware   |
| CenturyTel of the Gem State, Inc.         | Idaho      |
| CenturyTel of Inter Island, Inc.          | Washington |
| CenturyTel of Larsen-Readfield, LLC       | Delaware   |
| CenturyTel of the Midwest-Kendall, LLC    | Delaware   |
| CenturyTel of the Midwest-Wisconsin, LLC  | Delaware   |
| CenturyTel of Minnesota, Inc.             | Minnesota  |
| CenturyTel of Monroe County, LLC          | Delaware   |

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| CenturyTel of Montana, Inc.                 | Oregon      |
| CenturyTel of Northern Wisconsin, LLC       | Delaware    |
| CenturyTel of Northwest Wisconsin, LLC      | Delaware    |
| CenturyTel of Oregon, Inc.                  | Oregon      |
| CenturyTel of Paradise, Inc.                | Washington  |
| CenturyTel of Cowiche, Inc.                 | Washington  |
| CenturyTel of Postville, Inc.               | Iowa        |
| CenturyTel of Southern Wisconsin, LLC       | Delaware    |
| CenturyTel of the Southwest, Inc.           | New Mexico  |
| CenturyTel Telecom Service, Inc.            | Washington  |
| CenturyTel Telephone Utilities, Inc.        | Washington  |
| CenturyTel of Upper Michigan, Inc.          | Michigan    |
| CenturyTel of Washington, Inc.              | Washington  |
| CenturyTel/WORLDVOX, Inc.                   | Oregon      |
| CenturyTel of Wyoming, Inc.                 | Wyoming     |
| Eagle Valley Communications Corporation     | Colorado    |
| International Communications Holdings, Inc. | Delaware    |
| Pacific Telecom, Inc. (Shell)               | Oregon      |
| PTI Communications of Ketchikan, Inc.       | Alaska      |
| PTI Communications of Minnesota, Inc.       | Minnesota   |
| PTI Transponders, Inc.                      | Oregon      |
| Universal Manufacturing Corp.               | Wisconsin   |
| CenturyTel of Idaho, Inc.                   | Delaware    |
| CenturyTel Internet Holdings, Inc.          | Louisiana   |
| centurytel.com, LLC                         | Louisiana   |
| CenturyTel Investments, LLC                 | Louisiana   |
| CenturyTel of Michigan, Inc.                | Michigan    |
| CenturyTel Midwest - Michigan, Inc.         | Michigan    |
| CenturyTel Mobile Communications, Inc.      | Louisiana   |
| CenturyTel of Mountain Home, Inc.           | Arkansas    |
| CenturyTel of North Mississippi, Inc.       | Mississippi |
| CenturyTel of Northern Michigan, Inc.       | Michigan    |
| CenturyTel of Odon, Inc.                    | Indiana     |
| CenturyTel of Ohio, Inc.                    | Ohio        |
| CenturyTel of Ooltewah-Collegedale, Inc.    | Tennessee   |
| CenturyTel of Port Aransas, Inc.            | Texas       |

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| CenturyTel of Redfield, Inc.                 | Arkansas       |
| CenturyTel SM Telecorp, Inc.                 | Texas          |
| CenturyTel Telecommunications, Inc.          | Texas          |
| CenturyTel of San Marcos, Inc.               | Texas          |
| CenturyTel San Marcos Investments, LLC       | Delaware       |
| CenturyTel Security Systems, Inc.            | Louisiana      |
| CenturyTel Service Group, LLC                | Louisiana      |
| CenturyTel of South Arkansas, Inc.           | Arkansas       |
| CenturyTel Supply Group, Inc.                | Louisiana      |
| CenturyTel/Tele-Max, Inc.                    | Texas          |
| CenturyTel of Lake Dallas, Inc.              | Texas          |
| CenturyTel Web Solutions, LLC                | Louisiana      |
| CenturyTel of Wisconsin, LLC                 | Louisiana      |
| Embarq Corporation                           | Delaware       |
| Carolina Telephone and Telegraph Company LLC | North Carolina |
| NOCUTS, Inc.                                 | Pennsylvania   |
| SC One Company                               | Kansas         |
| Centel Corporation                           | Kansas         |
| Centel Capital Corporation                   | Delaware       |
| Centel-Texas, Inc.                           | Texas          |
| Central Telephone Company of Texas           | Texas          |
| EQ Central Texas Equipment LLC               | Texas          |
| Central Telephone Company                    | Delaware       |
| Central Telephone Company of Virginia        | Virginia       |
| Embarq Florida, Inc.                         | Florida        |
| The Winter Park Telephone Company            | Florida        |
| CenturyLink Intellectual Property LLC        | Delaware       |
| Embarq Directory Trademark Company, LLC      | Delaware       |
| CenturyLink Public Communications, Inc.      | Florida        |
| CenturyLink Sales Solutions, Inc.            | Delaware       |
| Embarq, Inc.                                 | Kansas         |
| Embarq Capital Corporation                   | Delaware       |
| SC Seven Company                             | Kansas         |
| Embarq Interactive Holdings LLC              | Delaware       |
| Embarq Interactive Markets LLC               | Delaware       |
| Embarq Management Company                    | Delaware       |

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| EQ Management Equipment LP                        | Nevada         |
| Embarq Mid-Atlantic Management Services Company   | North Carolina |
| Embarq Minnesota, Inc.                            | Minnesota      |
| Embarq Missouri, Inc.                             | Missouri       |
| SC Eight Company                                  | Kansas         |
| Embarq Network Company LLC                        | Delaware       |
| EQ Equipment Leasing, Inc.                        | Delaware       |
| United Telephone Company of the Carolinas LLC     | South Carolina |
| SC Two Company                                    | Kansas         |
| United Telephone Company of Eastern Kansas        | Delaware       |
| United Telephone Company of Florida               | Florida        |
| United Telephone Company of Indiana, Inc.         | Indiana        |
| SC Four Company                                   | Kansas         |
| United Telephone Company of Kansas                | Kansas         |
| Embarq Midwest Management Services Company        | Kansas         |
| United Teleservices, Inc.                         | Kansas         |
| United Telephone Company of New Jersey, Inc.      | New Jersey     |
| United Telephone Company of the Northwest         | Oregon         |
| United Telephone Company of Ohio                  | Ohio           |
| SC Five Company                                   | Kansas         |
| United Telephone Company of Pennsylvania LLC, The | Pennsylvania   |
| SC Six Company                                    | Kansas         |
| Valley Network Partnership                        | Virginia       |
| United Telephone Company of Southcentral Kansas   | Arkansas       |
| United Telephone Company of Texas, Inc.           | Texas          |
| EQ United Texas Equipment LLC                     | Texas          |
| United Telephone Company of the West              | Delaware       |
| United Telephone Southeast LLC                    | Virginia       |
| SC Three Company                                  | Kansas         |
| Hillsboro Telephone Company, Inc.                 | Wisconsin      |
| Lafayette MSA Limited Partnership                 | Delaware       |
| Madison River Communications Corp.                | Delaware       |
| Gallatin River Holdings L.L.C.                    | Delaware       |
| Gallatin River Communications L.L.C.              | Delaware       |
| Madison River Finance Corp.                       | Delaware       |
| Madison River Holdings LLC                        | Delaware       |

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| Madison River LTD Funding LLC                      | Delaware       |
| Coastal Utilities, Inc.                            | Georgia        |
| Gulf Coast Services, LLC                           | Alabama        |
| Gulf Telephone Company, LLC                        | Alabama        |
| Madison River Management LLC                       | Delaware       |
| Mehtel, Inc.                                       | North Carolina |
| Pacific Telecom Cellular of Alaska RSA #1, Inc.    | Alaska         |
| Qwest Communications International, Inc.           | Delaware       |
| EUnet International Limited                        | United Kingdom |
| Qwest Capital Funding, Inc.                        | Colorado       |
| Qwest Europe LLC                                   | Delaware       |
| Qwest Services Corporation                         | Colorado       |
| CenturyLink Investment Management Company          | Colorado       |
| Qwest Corporation                                  | Colorado       |
| RiskSense, Inc.                                    | Delaware       |
| 1200 Landmark Center Condominium Association, Inc. | Nebraska       |
| Block 142 Parking Garage Association               | Colorado       |
| Qwest Database Services, Inc.                      | Colorado       |
| Qwest India Holdings, LLC                          | Delaware       |
| CenturyLink Technologies India Private Limited     | India          |
| Seal Infotech Private Limited                      | India          |
| The El Paso County Telephone Company               | Colorado       |
| MoveARoo, LLC                                      | Delaware       |
| Qwest Dex Holdings, Inc.                           | Delaware       |
| Qwest Government Services, Inc.                    | Colorado       |
| Qwest Wireless, L.L.C.                             | Delaware       |
| SkyComm Technologies Corporation                   | Delaware       |
| Spectra Communications Group, LLC                  | Delaware       |
| TelUSA Holdings, LLC                               | Delaware       |
| Telephone USA of Wisconsin, LLC                    | Delaware       |
| Western Re, Inc.                                   | Louisiana      |
| SIS Holdings LP                                    | Delaware       |
| Wildcat Holdco LLC                                 | Delaware       |
| Level 3 Parent, LLC                                | Delaware       |
| Legend Circle Holdings, Inc.                       | Delaware       |
| Eldorado Acquisition Two, Inc.                     | Delaware       |

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| Level 3 EON, LLC                             | Delaware            |
| Level 3 Financing, Inc.                      | Delaware            |
| Level 3 Holdings, Inc.                       | Delaware            |
| Continental Holdings, Inc.                   | Wyoming             |
| KMI Continental Lignite, Inc.                | Delaware            |
| Continental Level 3, Inc.                    | Delaware            |
| Continental Mineral Sales, Inc.              | Delaware            |
| CCC Canada Holding, Inc.                     | Delaware            |
| Front Range Insurance Company, Inc.          | Hawaii              |
| AmSoft Information Services Limited          | Mauritius           |
| Level 3 International Services, Inc.         | Delaware            |
| CenturyLink Communications Denmark Aps       | Denmark             |
| Level 3 Communications Austria GmbH          | Austria             |
| BTE Equipment, LLC                           | Delaware            |
| Level 3 Communications Canada Co.            | Nova Scotia         |
| Level 3 Communications, LLC                  | Delaware            |
| Global Crossing Americas Solutions, LLC      | Delaware            |
| Global Crossing Americas Solutions, Inc.     | Puerto Rico Branch  |
| CenturyLink Latin American Solutions, LLC    | Delaware            |
| Level 3 Communications of Virginia, Inc.     | Virginia            |
| XCOM Technologies of New York, Inc.          | New York            |
| IP Networks, Inc.                            | Delaware            |
| TelCove Operations, LLC                      | Delaware            |
| TelCove of Pennsylvania, LLC                 | Delaware            |
| WilTel Communications (Cayman) Limited       | Cayman Islands      |
| WilTel International Telecom (Chile) Limited | Cayman Islands      |
| Williams Comunicaciones Chile Limitada       | Chile               |
| WilTel Communications Network, Inc.          | Canada              |
| WilTel Communications, LLC                   | Delaware            |
| WilTel Communications Pty Limited            | Australia           |
| Vyvx, LLC                                    | Delaware            |
| FTV Communications, LLC                      | Delaware            |
| Broadwing, LLC                               | Delaware            |
| ACME Grating Ventures, L.L.C.                | Delaware            |
| Broadwing Communications, LLC                | Delaware            |
| Corvis Gratings Company                      | Nova Scotia, Canada |

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| Corvis Canada, Inc.                          | Quebec, Canada |
| Global Crossing North America Holdings, Inc. | Delaware       |
| Global Crossing North America, Inc.          | New York       |
| Global Crossing Telecommunications, Inc.     | Michigan       |
| Global Crossing Local Services, Inc.         | Michigan       |
| Global Crossing Telemanagement VA, LLC       | Virginia       |
| The IRC Company, Inc.                        | Delaware       |
| Central Host, Inc.                           | California     |
| Level 3 Enhanced Services, LLC               | Delaware       |
| Level 3 Telecom, LLC                         | Delaware       |
| Level 3 Telecom Holdings, LLC                | Delaware       |
| Level 3 Telecom Data Services, LLC           | Delaware       |
| Level 3 Telecom of Arizona, LLC              | Delaware       |
| Level 3 Telecom of Colorado, LLC             | Delaware       |
| Level 3 Telecom of Idaho, LLC                | Delaware       |
| Level 3 Telecom of Illinois, LLC             | Delaware       |
| Level 3 Telecom of Iowa, LLC                 | Delaware       |
| Level 3 Telecom of Minnesota, LLC            | Delaware       |
| Level 3 Telecom of New Mexico, LLC           | Delaware       |
| Level 3 Telecom of Ohio, LLC                 | Delaware       |
| Level 3 Telecom of Oregon, LLC               | Delaware       |
| Level 3 Telecom of South Carolina, LLC       | Delaware       |
| Level 3 Telecom of Tennessee, LLC            | Delaware       |
| Level 3 Telecom of Texas, LLC                | Delaware       |
| Level 3 Telecom of Utah, LLC                 | Delaware       |
| Level 3 Telecom of Washington, LLC           | Delaware       |
| Level 3 Telecom Management Co., LLC          | Delaware       |
| Xspedius Management Co. International, LLC   | Delaware       |
| Level 3 Telecom of Alabama, LLC              | Delaware       |
| Level 3 Telecom of Arkansas, LLC             | Delaware       |
| Level 3 Telecom of DC, LLC                   | Delaware       |
| Level 3 Telecom of Kansas City, LLC          | Delaware       |
| Level 3 Telecom of Kentucky, LLC             | Kentucky       |
| Level 3 Telecom of Louisiana, LLC            | Delaware       |
| Level 3 Telecom of Maryland, LLC             | Delaware       |
| Level 3 Telecom of Mississippi, LLC          | Delaware       |

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| Level 3 Telecom of Nevada, LLC                          | Delaware          |
| Level 3 Telecom of Oklahoma, LLC                        | Delaware          |
| Level 3 Telecom of Virginia, LLC                        | Virginia          |
| Level 3 Telecom Holdings II, LLC                        | Delaware          |
| Level 3 Telecom, LP                                     | Delaware          |
| Level 3 Telecom of California, LP                       | Delaware          |
| Level 3 Telecom of Florida, LP                          | Delaware          |
| Level 3 Telecom of Georgia, LP                          | Delaware          |
| Level 3 Telecom of Hawaii, LP                           | Delaware          |
| Level 3 Telecom of Indiana, LP                          | Delaware          |
| Level 3 Telecom of New Jersey, LP                       | Delaware          |
| Level 3 Telecom of New York, LP                         | Delaware          |
| Level 3 Telecom of North Carolina, LP                   | Delaware          |
| Level 3 Telecom of Wisconsin, LP                        | Delaware          |
| Level 3 GC Limited                                      | Bermuda           |
| CenturyLink Communications PEC Luxembourg I S.à r.l.    | Luxembourg        |
| CenturyLink Communications PEC Luxembourg II S.à r.l.   | Luxembourg        |
| CenturyLink Communications PEC Services Europe Limited  | Ireland           |
| CenturyLink Communications PEC Services Ireland Limited | Ireland           |
| CenturyLink Communications PEC Ireland Limited          | Ireland           |
| Level 3 Communications Hong Kong Limited                | Hong Kong         |
| Level 3 Communications Singapore Pte. Ltd.              | Singapore         |
| Level 3 Communications Australia Pty Ltd                | Australia         |
| Global Crossing International Networks Ltd.             | Bermuda           |
| Level 3 Communications St. Croix, Inc.                  | US Virgin Islands |
| Century Link Costa Rica S.R.L.                          | Costa Rica        |
| SAC Peru S.R.L.   | Peru              |
| CenturyLink Panama                                      | Panama            |
| CenturyLink Holding Brasil Ltda.                        | Brazil            |
| CenturyLink Brasil Comunicações e Serviços Ltda.        | Brazil            |
| CenturyLink Communications (IMPSAT) Nederland B.V.      | Netherlands       |
| CenturyLink Impsat Holdings I Limited                   | United Kingdom    |
| CenturyLink Impsat Holdings II Limited                  | United Kingdom    |
| CTL Mexico Servicios, S. De R. L. de C. V.              | Mexico            |
| CTL Mexico Landing, S. de R.L.                          | Mexico            |
| CTL Mexico II, S. de R.L. de C.V.                       | Mexico            |



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|--|-------------------|
| CenturyLinkEcuador S.A.  | Ecuador           |
| CenturyLink Telecomunicaciones S.A.                                    | Venezuela         |
| CenturyLink Peru S.A.  | Peru              |
| CenturyLink Chile S.A.   | Chile             |
| CenturyLink Colombia S.A.  | Colombia          |
| CenturyLink Participações e Comercial Ltda.                            | Brazil            |
| CenturyLink Comunicações do Brasil Ltda.                               | Brazil            |
| Impsat Fiber Networks, LLC   | Delaware          |
| CenturyLink Argentina S.A.   | Argentina         |
| SAC Argentina Uruguay Branch   | Uruguay           |
| Global Crossing International, Ltd.                                    | Bermuda           |
| Level 3 Asia, Inc.   | Delaware          |
| Level 3 Communications (Asia Pacific) Ltd.                             | Hong Kong         |
| Level 3 International, Inc.  | Delaware          |
| Level 3 CDN International, Inc.  | Delaware          |
| CenturyLink EMEA Holdings Limited                                      | United Kingdom    |
| CenturyLink Communications Europe Limited                              | United Kingdom    |
| Level Three Telecommunications Kenya                                   | Kenya             |
| CenturyLink Communications UK Limited                                  | United Kingdom    |
| Fibernet UK Limited  | United Kingdom    |
| Level 3 Holdings B.V.  | Netherlands       |
| CenturyLink Iceland ehf  | Iceland           |
| CenturyLink Communications Bulgaria EOOD                               | Bulgaria          |
| Level 3 Communications Sp. z o. o.                                     | Poland            |
| Level 3 Komunikacijske Usluge d.o.o.                                   | Croatia           |
| Level 3 Communications A.B.  | Sweden            |
| CenturyLink Communications Norge AS                                    | Norway            |
| CenturyLink Communications France s.à.r.l.                             | France            |
| CenturyLink Hungary Communications Kft.                                | Hungary           |
| GC Pan European Crossing UK Ltd.                                       | United Kingdom    |
| CenturyLink Communications Italia Srl                                  | Italy             |
| CenturyLink Communications Switzerland AG                              | Switzerland       |
| CenturyLink Communications España S.A.                                 | Spain             |
| Level 3 Communications España S.A. - Sucursal Em Portugal              | Portuguese Branch |
| CenturyLink Communications Telekomünikasyon Hizmetleri Limited Şirketi | Turkey            |
| CenturyLink Communications Germany GmbH                                | Germany           |

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| CenturyLink Communications NL B.V.                      | Netherlands    |
| Level 3 Communications Japan KK                         | Japan          |
| CenturyLink Communications NL BV                        | Greek Branch   |
| Level 3 telekomunikačijski storitve d.o.o.              | Slovenia       |
| Level Three Communications Israel Ltd.                  | Israel         |
| Level 3 Communications Limited                          | United Kingdom |
| CenturyLink Communications Finland Oy                   | Finland        |
| Level 3 Communications S.A.                             | Belgium        |
| CenturyLink Communications RS d.o.o. Beograd-Stari Grad | Serbia         |
| CenturyLink Communications Ireland Limited              | Ireland        |
| CenturyLink Communications CDN Ireland Limited          | Ireland        |
| CenturyLink Communications CZ s.r.o                     | Czech Republic |
| CenturyLink Communications Luxembourg S.à r.l.          | Luxembourg     |
| CenturyLink Communications Estonia OÜ                   | Estonia        |
| OOO “CenturyLink Communications”                        | Russia         |
| CenturyLink Communications South Africa (Pty) Limited   | South Africa   |
| Level 3 Communications spol. s.r.o.                     | Slovakia       |
| Level 3 Europe B.V.                                     | Netherlands    |
| CenturyLink Communications Romania S.R.L.               | Romania        |