



CenturyLink™

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EX PARTE NOTICE

April 23, 2018

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

Re: *CenturyLink Broadband Deployment Semi-Annual Report*, WC Docket No. 10-110

Dear Ms. Dortch:

On Thursday, April 19, 2019, Craig Brown, Tom Freeberg, Dan Sorensen, Michael Underwood (all by phone) and I, on behalf of CenturyLink, met with Madeleine Findley, Daniel Kahn, Terri Natoli, Dennis Johnson, Jodie May, and Pam Megna of the Wireline Competition Bureau and Joel Rabinowitz of the Office of General Counsel, regarding the above-captioned matter.

In this meeting, we reported that it appears that CenturyLink has met or exceeded all of the April 1, 2018 broadband deployment commitments made in connection with the Commission's review of the transfer of control of Qwest to CenturyLink. These are the final broadband deployment milestones, and there are no provisions in the Commission's Order approving the transfer of control specifying how CenturyLink should memorialize the final totals (the final semi-annual report was filed earlier this year). Accordingly, we discussed what information CenturyLink will provide in an upcoming filing in this docket.

We also discussed the somewhat different methods CenturyLink has used to ensure that CAF I supported living units are not included in the merger commitments as required in the Order. At no point has CenturyLink included CAF I supported living units in the totals reported in this docket. CenturyLink explained that initially CenturyLink used an overbroad approach of excluding all living units in a given geographic area to ensure that no CAF I supported locations were included in the totals because more precise information was not yet available. As better information became available, the methodology was revised to exclude just the specific locations associated with the CAF I program.

The Commission's Order approving the transfer of control of Qwest did not mention the proper treatment of CAF II supported locations as that program had not been developed at the time. In addition, some CAF II supported locations were deployed prior to the start of CAF II funding, consistent with that

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program. Consequently, CenturyLink did not exclude CAF II supported locations from the reports on broadband deployment in connection with the Qwest merger commitments until recently. As the final Qwest merger commitment deployment milestone approached this year, CenturyLink revisited the proper treatment of CAF II locations as part of a complete review of the commitment progress. Based on this review, and after discussing the matter with Commission staff, CenturyLink will exclude locations associated with the CAF II program from the final totals for the broadband deployment commitments. In addition, CenturyLink will file revised totals for prior periods to show the progress over the past 7 years using a consistent reporting methodology for CAF I and CAF II related locations.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the above-referenced docket. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey D. Lang". The signature is fluid and cursive, with a long horizontal stroke at the end.

Copies via email to: Madeleine Findley, Daniel Kahn, Terri Natoli, Dennis Johnson, Jodie May,
Pam Megna, Joel Rabinowitz