John E. (Jeb) Benedict
Vice President – Federal Regulatory
  Affairs & Regulatory Counsel
1099 New York Avenue, N.W.
Suite 250
Washington, DC 20001
Tel: 202-429-3114
Fax: 720-264-7985
John.e.benedict@centurylink.com

VIA ECFS

May 1, 2018

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

Re: *Policy and Rules Concerning the Interstate Interexchange Marketplace;*
      Implementation of Section 254(g) of the Communications Act of 1934, as
      Amended, CC Docket No. 96-61

Dear Ms. Dortch:

On behalf of CenturyLink, Inc., attached is the 2018 certification of compliance with the Federal Communications Commission's geographic rate averaging and rate integration requirements pursuant to 47 C.F.R. § 64.1900. The certification covers the combined operations of all CenturyLink, Inc. subsidiaries.

If you have any questions, please contact me.

Respectfully submitted,

/s/ John E. Benedict

Attachment

CERTIFICATION OF COMPLIANCE WITH SECTION 64.1801 OF THE RULES OF THE FEDERAL COMMUNICATIONS COMMISSION – RATE INTEGRATION AND GEOGRAPHIC RATE AVERAGING RULES
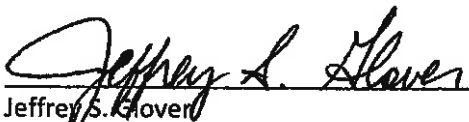
I, Jeffrey S. Glover, declare as follows:

I am the Vice President, Regulatory Operations, CenturyTel Service Group, LLC, a subsidiary of CenturyLink Inc., acting on behalf of CenturyTel Service Group, LLC, CenturyLink Operating Companies, CenturyLink Communications, LLC and Qwest Corporation d/b/a CenturyLink QC. I am authorized to execute this certification on behalf of all of these entities.

These Companies provide interstate interexchange telecommunications services that are subject to 47 U.S.C 254(g) and Section 64.1801 of the rules of the Federal Communications Commission (Commission). Following its acquisition of the Level 3 companies, CenturyLink continues the ongoing process of integrating operations and policies, where appropriate, including within and among long distance affiliates.

I am familiar with the rules and regulations of the Federal Communications Commission concerning rate integration and rate averaging and with the interexchange telecommunications services of these companies.

Pursuant to Section 64.1900 of the Commission's rules, I hereby declare under penalty of perjury that, to the best of my knowledge, information, and belief, and apart from any immaterial issues previously disclosed or arising from ongoing merger-related adjustments and corrections, CenturyLink's interstate offerings subject to the certification requirements of Section 64.1900 do not violate the rate integration of rate averaging provisions of the Telecommunications Act of 1996, or the Commission's implementing rules.

Jeffrey S. Glover
Vice President, Regulatory Operations & Analytics
CenturyTel Service Group, LLC
Dated: April 13 2018

Rate Integration
2017 Annual Review

CenturyLink long distance companies provide long distance services to its retail customers in a ubiquitous manner. All CenturyLink companies which provide interstate interexchange services comply with the FCC's Rate Integration and Rate Averaging rules with the following exceptions:

Exception No 1
CenturyLink's terminating access services are priced based on the identity of the terminating LATA and bands within those LATA based on cost, and are in compliance with the rate integration and rate averaging rules.

Exception No 2
CenturyLink private line and advanced communications services are provided under contract and include the cost of Local Access Facilities which provide the physical connection between the customer's service address and CenturyLink's domestic network.

Exception No 3
CenturyLink has identified situations where some customers have different rates, or, the service is not ubiquitously offered across the Company's footprint due to corporate restructuring. CenturyLink will be making the necessary programming changes after appropriate customer notifications have been completed. These interstate services include; toll free features for small business customers, and the Long Distance Line Charge for residence and business customers.