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**VIA ECFS**

May 8, 2019

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

Re: Application of Qwest Corporation d/b/a CenturyLink QC Pursuant to 47 C.F.R.  
§ 63.63 for the Emergency Impairment of Service; WC Docket No. 19-69

Dear Ms. Dortch:

On September 18, 2018, Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) filed the above-referenced Application for the emergency impairment of service in limited portions of the Florence, Colorado wire center primarily as a result of damage sustained from flooding in mid-July 2018 (“Application”).<sup>1</sup> CenturyLink has made filings to extend authority for this emergency impairment, and, by this letter, seeks a further extension of authority for an additional 60 days. CenturyLink has continued to explore options for service restoral and has kept the community informed and engaged in its efforts. However, in light of the substantial challenges in this area as described in the Application and subsequently-filed extensions, which are incorporated herein by reference, wireline telecommunications services have not been restored. Accordingly, pursuant to Section 63.63(b) of the Commission’s Rules, 47 C.F.R. § 63.63(b), CenturyLink respectfully requests an additional 60-day extension of the authority for the emergency impairment of service in limited portions of the Florence wire center.

As stated in the Application, CenturyLink is still unable to state what effect this impairment may have on rates in the area as it continues to evaluate options to restore service. CenturyLink previously supplied impacted customers with satellite phones for their use free-of-charge and has transitioned to providing these customers a subsidy to obtain service from

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<sup>1</sup> Prior to the establishment of a docket number for this matter, CenturyLink’s Application and filings to extend authority were submitted via the “Submit a Non-Docketed Filing” module of the Commission’s Electronic Comment Filing System pursuant to Sections 63.63(a), (b), 47 C.F.R. §§ 63.63(a), (b).

HughesNet or ViaSat.<sup>2</sup> CenturyLink is working with affected customers to help ensure a seamless transition to this new temporary service option, but thus far only eight (8) customers have availed themselves of it.

In its Application and in the extensions previously filed, CenturyLink noted that the timing of service restoration would likely depend on the reconstruction of critical infrastructure in the area, namely County Road 386. As noted in those filings, the area continues to experience landslides and is expected to be unstable for a prolonged period of time,<sup>3</sup> putting this preferred option for restoral on a lengthy timeline, at best, if it is viable at all. Rugged, mountainous terrain and instability in the area make it infeasible to install temporary cable to provide service.

Other options are being pursued and CenturyLink continues its work with the Custer County Commissioners, Senator Cory Gardner's office, the Colorado Department of Transportation, and the United States Forest Service to explore alternatives. CenturyLink held a stakeholder meeting on March 29, 2019 with most of these entities<sup>4</sup> regarding potential solutions to provide service to affected customers; however, additional time is needed to finalize and implement a plan to restore service. Another meeting is currently being organized for late May or early June 2019.

Options under consideration include state and federal broadband funding mechanisms to help defray the cost of rebuilding while also potentially enabling provision of broadband to this area and other neighboring underserved areas. State broadband grant applications will be due on July 15, 2019, and CenturyLink intends to seek funding for this area. Additionally, CenturyLink will continue to coordinate with other stakeholders and will report additional information regarding service restoral within approximately the next 60 days as part of the emergency impairment filing process under Section 63.63.

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<sup>2</sup> It is CenturyLink's intent not to charge affected customers for services during the outage period.

<sup>3</sup> See Exhibit A to November 19, 2018 filing which is a summary of challenges related to rebuilding in the area prepared by the United States Forest Service.

<sup>4</sup> The Colorado Department of Transportation was invited but unable to attend the March 29, 2019 meeting.

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For the foregoing reasons, in light of the devastating flooding and continued construction challenges in the area, CenturyLink respectfully requests that the Commission approve a further 60-day extension of authority for the emergency impairment of service in limited portions of the Florence wire center.

Respectfully submitted,

**QWEST CORPORATION D/B/A  
CENTURYLINK QC**

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