



CenturyLink™

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EX PARTE NOTICE

May 24, 2018

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

Re: *Developing an Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92;
Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket
No. 07-135; *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On Tuesday, May 22, 2018, Joe Cavender and I, on behalf of CenturyLink, met separately with Amy Bender, Legal Advisor to Commissioner O’Rielly and Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel. On Thursday, May 24, 2018 Joe Cavender and I met with Jamie Susskind, Chief of Staff for Commissioner Carr. In all three meetings, we discussed the direct interconnection proposal CenturyLink filed in the above-captioned docket on May 21, 2018.

CenturyLink explained that its proposed rule would align the responsibility for determining how terminating access traffic should be routed with the financial responsibility for that decision. This will encourage efficient network deployment and investment decisions, reduce incentives to engage in regulatory arbitrage, enhance competition and market efficiency, and reduce disputes. CenturyLink also discussed how the Commission has ample authority to adopt the proposed rule under sections 251(a) and 251(b) of the Act.

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,

Copies via email to: Amy Bender, Travis Litman, and Jamie Susskind