

## **APPENDIX 3**

In the Matter of )  
 )  
Restoring Internet Freedom ) WC Docket No. 17-108

CenturyLink offers BIA Service to consumers and small businesses across the 37 states where CenturyLink is the Incumbent Local Exchange Carrier (ILEC). We also offer BIA service to small business customers in a limited number of markets outside our ILEC serving area.

The purpose of this declaration is to provide the estimated number of employee resources and the number of hours these resources have spent to (1) develop compliance for the enhanced transparency requirements adopted in the FCC 2015 Open Internet Order (“2015 Order”) and (2) develop compliance for the remaining Open Internet obligations adopted in the 2015 Order. These estimates do not include compliance work related to other aspects of the Title II regime other than the Open Internet rules.

**II. *THE 2015 ORDER REQUIRES SUBSTANTIAL RESOURCES IN THE FORM OF PERSONNEL AND TIME TO ENSURE COMPLIANCE***

1. CenturyLink estimates that compliance work associated with the enhanced transparency requirements from February 2015 through February 2017 required material amounts of time from at least approximately 30 employees and a total of approximately 1,650 hours to complete. Further, CenturyLink estimates that approximately 150 employees in total contributed a total of approximately 2500 hours (the 1650 noted above plus an additional approximately 860 hours) to develop compliance related to the overall Open Internet obligations adopted in the 2015 Order.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
July 14, 2017.



Jeff Glover

Vice President of Regulatory Operations for  
CenturyLink