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**Via ECFS**

July 24, 2017

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *In the Matter of Rural Call Completion*; WC Docket No. 13-39  
CenturyLink's 2017 FCC Safe Harbor Call Routing Declaration

Dear Ms. Dortch:

Attached are CenturyLink's annual Safe Harbor call routing declarations for 2017, pursuant to the FCC's October 28, 2013 *Rural Call Completion Order* in WC Docket Nos. 13-39, *et al.*, in accord with 47 C.F.R. § 64.2107, and via FCC Form 480.

CenturyLink is proud to be a Safe Harbor qualifying carrier. This reflects CenturyLink's confidence in its network and service quality and its commitment to industry leadership on rural call completion. Safe Harbor routing policies help to minimize the number of carriers involved in routing a call from origination to completion. Implementing Safe Harbor policies is neither easy nor inexpensive. Additionally, although not required by the Commission's Safe Harbor rule, CenturyLink's policy seeks to limit routing to just one hop. CenturyLink's goal is to ensure a high level of call completion performance for all Americans, including those in rural communities.

Please contact me or Jason Topp (651-312-5364) if you have questions about this submission.

Sincerely,

/s/ John E. Benedict

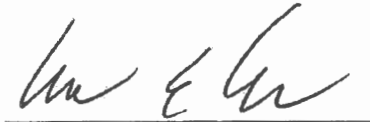
Attachments

Copy via email to:  
Jason Topp – CenturyLink  
Daniel Kahn – Chief, Competition Policy Division, FCC Wireline Competition Bureau

**Exhibit 1**

Attestation

I William E. Cheek, President Wholesale Markets, an officer of CenturyLink certify that CenturyLink Communications, LLC restricts by contract any intermediate provider to which a call is directed by CenturyLink from permitting more than one additional intermediate provider in the call path before the call reaches the terminating provider or terminating tandem. I certify that any nondisclosure agreement with an intermediate provider permits CenturyLink to reveal the identity of the intermediate provider and any additional intermediate provider to the Commission and to the rural incumbent local exchange carrier(s) whose incoming long-distance calls are affected by the intermediate provider's performance. I certify that CenturyLink has a process in place to monitor the performance of its intermediate providers.



date:

6/29/17

William E. Cheek,  
President Wholesale Markets

**Exhibit 2**

Intermediate Carrier Performance Management

CenturyLink continuously monitored the performance of the intermediate carriers it used. This monitoring data drove processes that rigorously managed the performance of these carriers. Since having instituted FCC Safe Harbor practices between late 2014 and April 1, 2015, CenturyLink customers reported significantly fewer concerns than was the pace previously. The performance management of CenturyLink's intermediate carriers regarded three procedures.

First, CenturyLink tracked and reviewed trouble ticket frequency, call answer rates and investigation status monthly in an interdepartmental gathering of mid-level directors. Route-specific data was reviewed in a manner that linked prior month measurements to particular intermediate carriers. When internally developed thresholds were exceeded by an intermediate carrier, they were removed from routing.

Second, CenturyLink met with its intermediate carriers and shared monitoring and measurement data. In these sessions CenturyLink conveyed serious concerns and positive outcomes. Probationary steps were established in some sessions.

Third, CenturyLink conducted pointed investigations into low call completion rates associated with individual OCNs. Where negative spikes in call answer rates occurred and where call answer rates consistently fell below 80% of the rural aggregate call answer rate, an automated system created trouble tickets. Those tickets were promptly addressed. In a typical month, CenturyLink conducted more than 60 such investigations.



William E. Cheek,  
President Wholesale Markets

date:

6/29/17