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Vice President – Federal Regulatory
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VIA ECFS & E-MAIL

September 21, 2018

Kris Monteith, Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: *Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering, Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's ARMIS Reporting Requirements, Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c), Petition of the Embarq Local Operating Companies for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain of ARMIS Reporting Requirements, et al., WC Docket No. 07-204; Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160 From Enforcement of Certain of the Commission's Cost Assignment Rules, WC Docket No. 07-21; Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain Legacy Telecommunications Regulations, WC Docket No. 12-61*

Dear Ms. Monteith:

As included in CenturyLink-QC¹ and CenturyLink's Independent LECs' Compliance Plans required by the Commission's *ARMIS Forbearance Order*,² the *AT&T Cost Assignment*

¹ The *Cost Assignment Forbearance Order* (FCC 08-203), *Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering*, 23 FCC Rcd 13647, rel. Sept. 6, 2008, was issued for Qwest Corporation (QC). QC is wholly owned by Qwest Communications International Inc. (QCII). On April 1, 2011, QCII and CenturyLink, Inc. consummated a transaction whereby QCII became a wholly owned subsidiary of CenturyLink, Inc. As a result of that transaction, QC is now known as CenturyLink-QC.

² *Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering, Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's ARMIS Reporting Requirements, Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c), Petition of the Embarq Local Operating Companies for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain of ARMIS Reporting Requirements, et al.,*

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Forbearance Order,³ and the *USTelecom Forbearance Order*,⁴ please find attached our section 254(k) certification. If you have any questions, please contact me.

Respectfully submitted,

/s/ John E. Benedict

Attachment

cc: Deena Shetler (deena.shetler@fcc.gov)

Memorandum Opinion and Order, 23 FCC Rcd 13647 (2008), *pets. for recon. dismissed or denied in USTelecom Forbearance Order*, note 4, *infra*, and *appeal dismissed sub nom. NASUCA v. FCC*, No. 08-1353 (D.C. Cir. Aug. 23, 2013).

³ *Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160 From Enforcement of Certain of the Commission's Cost Assignment Rules*, Memorandum Opinion and Order, 23 FCC Rcd 7302 (2008), *pets. for recon. dismissed or denied in USTelecom Forbearance Order*, note 4, *infra*, and *appeal dismissed sub nom. NASUCA v. FCC*, No. 08-1226 (D.C. Cir. Aug. 23, 2013).

⁴ *Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain Legacy Telecommunications Regulations*, Memorandum Opinion and Order, 28 FCC Rcd 7627 (2013), *aff'd sub nom. Verizon and AT&T v. FCC*, 770 F.3d 961 (D.C. Cir. 2014).

SECTION 254(k) CERTIFICATION

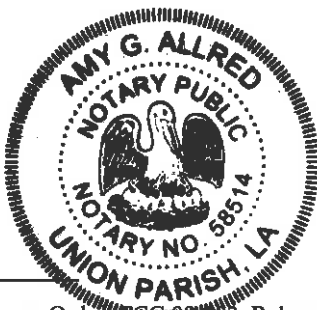
I certify to the best of my knowledge, information, and belief, that CenturyLink-QC¹ and CenturyLink's Independent LECs² will comply with their obligations under section 254(k) of the Communications Act of 1934, as amended, and CenturyLink will maintain and provide to the FCC any cost accounting information necessary to establish such compliance if appropriately requested to provide such information.

Jerry M Allen

Jerry Allen
Vice President – Consumer Financial Services

Subscribed and sworn to me, a notary public in and for the State of Louisiana
and the Parish of Orachita, on this 11th day of September,
2018.

My commission expires upon death.



Amy G Allred
Notary Public

¹ The Cost Assignment Forbearance Order (No. 08-203, Released September 6, 2008 in WC Dockets No. 07-21, 07-204 and 05-342) was issued for Qwest Corporation (QC). QC is wholly owned by Qwest Communications International Inc. (QCII). On April 1, 2011, QCII and CenturyLink, Inc. consummated a transaction whereby QCII became a wholly owned subsidiary of CenturyLink, Inc. As a result of that transaction, QC is now known as CenturyLink-QC.

² Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain Legacy Telecommunications Regulations, WC Docket No. 12-61, Memorandum Opinion and Order, 28 FCC Rcd 7627 (2013), pet. for rev. pending sub nom. Verizon and AT&T v. FCC, No. 13-1220 (D.C. Cir. Filed July 15, 2013).