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**VIA ECFS**

November 19, 2018

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

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 been working diligently to explore options for service restoral and has kept the community informed and engaged in its efforts. However, in light of the substantial devastation in the region from this natural disaster as described in the Application, combined with the fact the area is still very unstable with active landslides ongoing, wireline telecommunications services have not been fully restored. Accordingly, pursuant to Section 63.63(b) of the Commission's Rules, 47 C.F.R. § 63.63(b), CenturyLink respectfully requests a 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 restoring service. CenturyLink has supplied impacted customers with satellite phones for their use free-of-charge until a long-term solution is identified and implemented.<sup>2</sup> In its Application, CenturyLink noted that the timing of service restoration would likely depend on the reconstruction of critical

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<sup>1</sup> There is not a docket number associated with this Application but pursuant to Sections 63.63(a), (b), 47 C.F.R. §§ 63.63(a), (b), and consistent with its initial Application filing in September, CenturyLink is filing this extension request via the "Submit a Non-Docketed Filing" module of the Commission's Electronic Comment Filing System.

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

infrastructure in the area, namely County Road 386. Unfortunately, the area is still experiencing landslides and is expected to be unstable for a prolonged period of time,<sup>3</sup> signaling that this preferred option for restoral is unlikely to be viable. Given the rugged, mountainous terrain and instability in the area, it is also not feasible to install temporary cable to provide service. Other options will need to be pursued and CenturyLink has engaged the Custer County Commissioners, the Colorado Department of Transportation, and the USFS to explore alternatives. To this end, stakeholder meetings were held in October and November 2018; however, additional time is needed to finalize and implement a plan to restore service. CenturyLink will continue to coordinate with other stakeholders and expects to have additional information regarding service restoral within the next 60 days.

For the foregoing reasons, in light of the devastating flooding and continued instability in the area, CenturyLink respectfully requests that the Commission approve a 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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Its Attorney

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<sup>3</sup> The United States Forest Service (“USFS”) issued a brief report following an October 18, 2018 stakeholder meeting that summarizes the challenges in the area. A copy of that report is attached as Exhibit A.

# San Isabel National Forest – San Carlos Ranger District: Hardscrabble Flooding

Flooding along South Hardscrabble Creek, resulting from the 2016 Junkins Fire, has damaged multiple sections of Forest Service Road 386 (FSR 386) and phone infrastructure where CenturyLink has a buried cable authorized through a Special Use Permit. The flooding caused damage to the cable resulting in customers losing telephone land line connection.

The U.S. Forest Service (USFS) invited a group of collaborators to tour FSR 386 on Wednesday October 18, 2018. The objective was to assess current conditions. The group observed extensive damage and multiple areas along the steep terrain with high potential for debris flow in the near term (one - three years), with stability possible in 5 -10 years.

The CenturyLink State & Local Government Affairs Director indicated the trip was revealing and illuminated concerns about using this area for continued phone line service. With the existing damage and potential for more flooding and debris flow, there are insufficient stable areas to secure any type of phone line infrastructure. The Custer County Road & Bridge Supervisor acknowledged that the high probability for continued damage warrants allowing this area several years to settle before making an investment in road repair.

To address immediate needs, CenturyLink secured temporary satellite phone service for the affected customers. CenturyLink State & Local Government Affairs Director requested Custer County Commissioners coordinate with Colorado Department of Transportation and Department of Local Affairs to gain support at the State level for an alternate solution.

CenturyLink plans to examine the surrounding area and review options. CenturyLink and Custer County Commissioners are coordinating a public meeting in early November and will invite all stakeholders.

The USFS remains ready to work expeditiously on alternative sites CenturyLink identifies should the solution intersect with USFS administered land.