

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Verizon Petition for Limited Waiver of Rule 61.74(a))	WC Docket No. 17-308
To Allow a Verizon Tariff To Reference Another)	

COMMENTS OF CENTURYLINK

CenturyLink hereby files its Comments in response to Verizon’s Petition for Limited Waiver of Rule 61.74(a), seeking permission to include references in an FCC tariff to another of Verizon’s FCC tariffs.¹ CenturyLink agrees that there is good cause for this limited waiver and asks the Commission to extend its effect to all carriers covered by the Commission’s tariff rules.²

Like Verizon, CenturyLink includes numerous ILEC affiliates that were combined through a series of mergers. CenturyLink Tariff F.C.C. Nos. 1-8 apply to access and other related services provided by CenturyLink’s CenturyTel affiliates. CenturyLink Tariff F.C.C. No. 9 applies to these services provided by legacy Embarq, which merged with CenturyTel in 2009, and CenturyLink Tariff F.C.C. Nos. 11 and 12 apply to those provided by legacy Qwest, which merged with CenturyLink in 2011. Over time, CenturyLink has sought to standardize these tariff offerings to the extent possible. CenturyLink also frequently negotiates service arrangements that span the service territories of more than one CenturyLink ILEC affiliate and provide

¹ See Petition for Limited Waiver of Verizon, WC Docket No. 17-308 (Oct. 26, 2017) (Verizon Petition); *Wireline Competition Bureau Seeks Comment on Verizon Petition for Waiver of the Commission’s Rule for Tariffs Referring to Tariffs*, WC Docket No. 17-308, DA 17-1105 (Nov. 9, 2017). These comments are filed by, and on behalf of, CenturyLink, Inc. and its incumbent local exchange carrier (ILEC) subsidiaries.

² See 47 C.F.R. § 1.3 (“Any provision of the rules may be waived by the Commission on its own motion[.]”) On November 30, 2017, AT&T filed a petition for waiver mirroring Verizon’s petition. Petition for Limited Waiver of Rule § 61.74(a), WC Docket No. __ (Nov. 30, 2017) (AT&T Petition). AT&T also asked the Commission to extend this relief to all ILECs without requiring them to file their own separate petitions. *Id.* at 1 n.3.

discounts based on the customer's purchase of various CenturyLink services, including services purchased from multiple CenturyLink tariffs. To effectuate these arrangements, CenturyLink often includes interrelated terms and cross references in each of the affected tariffs. Currently that can be done only after obtaining special permission from the Commission,³ thus delaying service provision, alerting CenturyLink's competitors of the impending transaction, and generally making it more difficult for CenturyLink to compete.

A blanket waiver of Rule 61.74(a) in this narrow context will serve the public interest by allowing CenturyLink and other ILECs to provide service more quickly and compete more effectively. It will also enable the Commission to dedicate its finite resources to more productive use. There is also good cause for this narrow relief, which is consistent with good public policy and will not undermine any other Commission policies.⁴

For all these reasons, the Commission should grant the Verizon Petition and extend its requested relief to all tariff filers.

Respectfully submitted,

CENTURYLINK

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³ See 47 C.F.R. § 1.772.

⁴ See Verizon Petition at 3-4.