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SUBMISSION FOR THE RECORD

November 19, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Connect America Fund; A National Broadband Plan for Our Future; High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 05-337; CC Docket No. 96-45

Dear Ms. Dortch:

Over the past five months, CenturyLink has analyzed the potential financial impacts of changing the required downstream speed for networks supported with Connect America Fund, Phase II (CAF II) support from 4 Mbps to 10 Mbps. In the course of this analysis, CenturyLink's network engineering team has developed a preliminary estimate of the cost to construct a network that could deliver 10 Mbps downstream connectivity to CAF II eligible locations identified in the Connect America Model adopted by the Commission.

Based on the information currently available, CenturyLink estimates that it will cost between \$5 billion and \$6 billion in capital expenditure just to deploy the incremental network infrastructure to provide 10 Mbps downstream and 1 Mbps upstream to the "total number of price cap locations in [CAF II] census blocks ..." ¹ in CenturyLink's local service areas. This estimate does not include any provision for operating expenses or maintenance. CenturyLink's estimate is only preliminary, and remains subject to the possibility of significant revisions for several reasons, most notably that the Commission has not decided several important parameters of the CAF II program that may substantially impact network deployment costs.

¹ "Wireline Competition Bureau Releases Results for Adopted Connect America Cost Model," Public Notice, *Connect America Fund; A National Broadband Plan for Our Future*, WC Docket No. 10-90, 29 FCC Rcd 4126 (April 22, 2014) (adopting Cost America Model version 4.1.1, report version 7).

Ms. Marlene H. Dortch
November 19, 2014

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This Submission for the Record is being filed in the above-captioned dockets pursuant to the Commission's rules. If you have any questions, please contact me at 202-429-3113.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey A. Lanzetta". The signature is written in a cursive style with a horizontal line at the end.

Copy via email to:
Carol Matthey
Daniel Alvarez