



CenturyLink™

John E. Benedict (Jeb)
Vice President – Federal
Regulatory
Affairs & Regulatory
Counsel
1099 New York Ave., NW
Suite 250
Washington DC 20001
202.429.3114

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

July 31, 2015

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

Re: *In the Matter of Rural Call Completion*; WC Docket No. 13-39
CenturyLink's 2015 FCC Safe Harbor Call Routing Declaration

Dear Ms. Dortch:

CenturyLink is pleased to provide its Safe Harbor call routing declarations and accompanying materials. It provides this submission pursuant to with the FCC's October 28, 2013 *Rural Call Completion Order* in WC Docket Nos. 13-39, *et al.*, and 47 C.F.R. § 64.2107. Separately, CenturyLink has electronically transmitted its FCC Form 480, Rural Call Completion Reporting.

CenturyLink is proud of its network, the quality of its service, and its commitment to industry leadership on rural call completion. Safe Harbor routing policies help minimize the number of carriers involved in routing a call from origination to completion. Implementing these 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.

CenturyLink provides the following Exhibits:

- Exhibit 1 Call Completion Safe Harbor Attestation
- Exhibit 2 Intermediate Carrier Performance Management Attestation
- Exhibit 3 Confidential CenturyLink Exceptions Call Summary – Verizon (CD-ROM)
- Exhibit 4 Confidential CenturyLink Exceptions Call Detail – Verizon (CD-ROM)

As previously reviewed with the Wireline Competition Bureau, some limited exceptions to Safe Harbor call routing are inevitable. First, CenturyLink identified an anticipated very small volume of calls routing to Verizon. Verizon does not offer a Safe Harbor product and

Ms. Marlene H. Dortch
July 31, 2015
Page 2

may or may not utilize another intermediate carrier in routing calls. Due to a very limited number of providers for such services, CenturyLink has no choice but to use Verizon as a carrier on disaster recovery routes and as a routing option of last resort because of the breadth of Verizon's network. During 2Q15, CenturyLink discovered routing which resulted in some calls being routed to disaster recovery paths (last route choice) that included Verizon.

Consistent with CenturyLink's Safe Harbor commitment to the Wireline Competition Bureau, CenturyLink includes a two-part report of Safe Harbor exceptions for calls necessarily routed to Verizon as carrier of last resort. A very few calls may also have been routed to Verizon in error. Exhibits 3 and 4 are spreadsheets on CD-ROM providing record summaries for calls routed to Verizon. They are a very small fraction of CenturyLink traffic.

CenturyLink appropriately submits that call data subject to a **Request for Confidential Treatment** and exemption from public disclosure. The request applies solely to the content of Exhibits 3 and 4, as set out in the Appendix to this letter. CenturyLink has separately filed a redacted version of this submission via ECFS.

Second, consistent with the Order, CenturyLink has identified auto-dialer traffic to the extent it is able to do so. However, CenturyLink is able to perform a high-burst calculation (and associated customer identification) only for traffic processed by our DMS switches. CenturyLink operates both DMS and Sonus switches. If a party using an auto-dialer is served directly by a Sonus switch, CenturyLink lacks a means of identifying such calls. CenturyLink strives to serve these customers from DMS switches, but that cannot always be possible. A very small number of calls may fall into this category.

Third, to implement Safe Harbor policies, CenturyLink carefully reviewed all manual routing decisions prior to April 1, 2015. In that review, where appropriate, manual routing was revised to avoid reliance on intermediate carriers that cannot meet requirements necessary to ensure CenturyLink's one-hop Safe Harbor routing. During this process, some small amount of special temporary routing to Verizon will have continued beyond April 1 to ensure no disruption of call quality and completion. CenturyLink revised such routes during this quarter. Exhibits 3 and 4 include such calls.

CenturyLink shares the Commission's interest in improving the call completion experience for American businesses and consumers. Please contact me or Jason Topp (651-312-5364) if you have questions.

Sincerely,

/s/ John E. Benedict

Attachments

cc: Jason Topp
Randy Clarke

REDACTED - FOR PUBLIC INSPECTION

APPENDIX

Confidentiality Request

47 C.F.R. § 0.457

CenturyLink requests confidential treatment under 47 C.F.R. § 0.457 of Exhibits 3 and 4 included with its July 31, 2015 letter filing in WC Docket No. 13-39.¹ The confidential information includes summary and detail data on Safe Harbor exceptions for calls routed to Verizon. This information is the type of confidential and proprietary commercial and customer information that is protected from public disclosure and inspection under the Commission's FOIA implementing rules,² including 47 C.F.R. § 0.457(d).

47 C.F.R. § 0.459

CenturyLink also considers the confidential information submitted with Exhibits 3 and 4 to its July 31, 2015 letter filing in WC Docket No. 13-39 as protected from public disclosure and inspection pursuant to 47 C.F.R. § 0.459(b) as described as follows.

Information for which confidential treatment is sought

CenturyLink seeks confidential treatment for Exhibits 3 and 4 because the confidential data included is proprietary commercial information and customer sensitive information that is entitled to protection from public disclosure and availability. As such, this information is marked "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**".

Commission proceeding in which the information was submitted

The confidential information is being submitted in Exhibits 3 and 4 with CenturyLink's July 31, 2015 letter filing in WC Docket No. 13-39, *In the Matter of Rural Call Completion*.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The information that CenturyLink considers proprietary and confidential includes summary and detail data on Safe Harbor exceptions for calls routed to Verizon. This confidential and proprietary commercial and customer information is not routinely available for public disclosure from CenturyLink and thus is protected from public availability and inspection under 47 C.F.R. § 0.457(d). Additionally, as the data includes call detail information (including calling and called number, and date and time of call), it is properly treated as

¹ *In the Matter of Rural Call Completion*, WC Docket No. 13-39, CenturyLink's 2015 FCC Safe Harbor Call Routing Declarations and accompanying materials.

² 47 C.F.R. §§ 0.457, 0.459; *see also* 5 U.S.C. § 552.

confidential under the Commission's rules governing customer proprietary information to protect the privacy interests of consumers.

Degree to which the information concerns a service that is subject to competition; and manner in which disclosure of the information could result in substantial competitive harm

The type of confidential information included with CenturyLink's submission would generally not be subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)), demonstrating that the Commission already anticipates that its release likely would produce competitive harm. The types of services that CenturyLink provides, including local exchange and interexchange, are competitive. The release of this confidential information would cause competitive harm by allowing competitors to become aware of sensitive commercial information regarding CenturyLink's business and internal operations as they relate to call completion. The summary and detail data provided in Exhibits 3 and 4 may also be considered proprietary and competitively sensitive by Verizon as it is information relating to calls routed to Verizon for completion. Moreover, as the data includes call detail information (including calling and called number, and date and time of call), the content is properly treated as confidential to protect the privacy interests of calling and called parties.

Measures taken to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosure of the information to third parties

CenturyLink has treated and treats the confidential information disclosed in Exhibits 3 and 4 as confidential, and has protected the information from public disclosure.

Justification of the period during which CenturyLink asserts that the material should not be available for public disclosure

At this time, CenturyLink cannot determine any date on which the confidential information included with its submission should not be considered confidential or become stale for purposes of the current matter, except that it will be handled in conformity with CenturyLink's general records retention policy, absent any continuing legal hold.

Other information that CenturyLink believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable FCC and court rulings, the information in question should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act shields information that is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The information in question satisfies this test.

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.

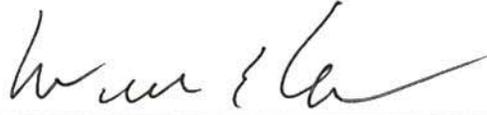

_____ date: 7/27/2015
William E. Cheek,
President Wholesale Markets

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 falls generally into three procedures. These procedures are described as follows.

First, CenturyLink tracks trouble tickets, issue resolution, call answer rates and investigation status monthly in an interdepartmental gathering of directors. Monitoring data is reviewed in a manner that links prior month measurements to particular intermediate carriers. Internally developed thresholds can be exceeded by an intermediate carrier. Decisions to cease use of particular carriers can be made in this session.

Second, CenturyLink meets with its intermediate carriers and shares monitoring and measurement data. In these sessions CenturyLink conveys serious concerns and positive outcomes. Probationary steps can be established in these sessions.

Third, CenturyLink conducts pointed investigations into low call completion rates associated with individual OCNs. Where negative spikes in call answer rates occur and where call answer rates consistently are low, an automated system creates trouble tickets. Those tickets are promptly addressed.

CenturyLink strived to complete a call rather than block the call in the very few cases when all Safe Harbor routes were exhausted. For example, despite the fact that Verizon would not sign a Safe Harbor routing contract with CenturyLink, Verizon remained the last routing option behind all Safe Harbor certified intermediate carriers, inclusive of AT&T, on some routes, for reliability and redundancy. For example, regarding offshore US Territories, Puerto Rico is on the CenturyLink network, but CenturyLink continued to develop relationships to provide direct termination service to other Territorial locations in an effort to become less dependent on Verizon over time.

CenturyLink necessarily routed less than .02% of its traffic to Verizon with whom it had not secured a Safe Harbor contract.



date:

7/27/2015

William E. Cheek,
President Wholesale Markets

REDACTED – FOR PUBLIC INSPECTION
 WC Docket No. 13-39, Rural Call Completion
 July 31, 2015 CenturyLink Submission - Exhibit 3

April 2015
 Covered Provider: CenturyLink
 Terminating Carrier: Verizon (MCI)

State	Rural OCN	Interstate Calls Attempted	Interstate Answered	Interstate Busy	Interstate Ring No Answer	Interstate Unassigned Number	Interstate % Calls Answered	Interstate % Calls Completed	Interstate Calls Attempted	Interstate Answered	Interstate Busy	Interstate Ring No Answer	Interstate Unassigned Number	Intrastate % Calls Answered	Intrastate % Calls Completed	Total Calls Attempted	Total Answered	Total Busy	Total Ring No Answer	Total Unassigned Number	Total Calls Answered	Total % Calls Completed
SPREADSHEET CONTENT HAS BEEN REDACTED																						

REDACTED – FOR PUBLIC INSPECTION
WC Docket No. 13-39, Rural Call Completion
July 31, 2015 CenturyLink Submission - Exhibit 4

Carrier_Ind Rural_Ind State OCN Jurisdiction Record_Type Attempted Answered Busy Ring_No_Answer Unassigned Start Date Time End Date Time

SPREADSHEET CONTENT HAS BEEN REDACTED

REDACTED – FOR PUBLIC INSPECTION
WC Docket No. 13-39, Rural Call Completion
July 31, 2015 CenturyLink Submission - Exhibit 4

Dialed Number Calling Number LRN Calling Party Number Called Number Called Number LRN Call Duration Disconnect Type Treatment Code Cdr Oid

SPREADSHEET CONTENT HAS BEEN REDACTED

REDACTED – FOR PUBLIC INSPECTION
WC Docket No. 13-39, *Rural Call Completion*
July 31, 2015 CenturyLink Submission - Exhibit 4

Carrier_Ind Rural_Ind State OCN Jurisdiction Record_Type Attempted Answered Busy Ring_No_Answer Unassigned Start Date Time End Date Time

SPREADSHEET CONTENT HAS BEEN REDACTED

REDACTED – FOR PUBLIC INSPECTION
WC Docket No. 13-39, *Rural Call Completion*
July 31, 2015 CenturyLink Submission - Exhibit 4

Dialed Number	Calling Number	Called Number	Called Number B4 Translation 1	Called Number LRN	Call Service Duration	Disconnect Reason	CDR Old
---------------	----------------	---------------	--------------------------------	-------------------	-----------------------	-------------------	---------

SPREADSHEET CONTENT HAS BEEN REDACTED