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**Jeanne W. Stockman**  
Senior Corporate Counsel

**VIA ECFS**

NOTICE OF EX PARTE

August 20, 2015

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

Re: *Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket No. 15-80

Dear Ms. Dortch:

On August 18, 2015, Stacy Hartman, Jeanne Stockman and Melissa Newman, all of CenturyLink, met by conference call with the following members of the Public Safety and Homeland Security Bureau and Media Bureau to discuss the above-captioned proceeding: Admiral David Simpson, Jeffery Goldthorp, Lauren Kravetz, John Healy, Lisa Fowlkes, Kevin Green, Scott Mackoul, Theo Marcus, Jerome Stanshine, and Brenda Villanueva.

In this meeting, CenturyLink discussed amending Section 4.5(e)(1) of the Commission's Rules to address partial losses of communications to PSAPs. CenturyLink explained that it could support defining such losses as when at least 80% of the trunks serving a PSAP are disabled, so long as there is a reasonable implementation schedule for this change. This alternative is preferable to other proposals that would be more costly or burdensome to implement. Due to other 911-related activities such as the upcoming reliability certifications required under Section 12 of the Commission's Rules, CenturyLink proposes that reporting on an 80% partial loss threshold not become effective until at least October 15, 2016 or later.

CenturyLink also explained that imposing new reporting requirements for call blockages in the wireline network, especially for short duration events, would be burdensome and challenging due to the current lack of fully integrated monitoring capabilities across its service footprint and the need to manually compile data. In addition, CenturyLink reiterated its position that reducing the

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simplex outage reporting threshold from 5 days to 48 hours is unwarranted given that the overwhelming majority of these events do not result in service-affecting conditions.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the appropriate docket.

Sincerely,

/s/ Jeanne W. Stockman

cc (via email): Admiral David Simpson  
Jeffery Goldthorp  
Lauren Kravetz  
John Healy  
Lisa Fowlkes  
Kevin Green  
Scott Mackoul  
Theo Marcus  
Jerome Stanshine  
Brenda Villanueva