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Associate General Counsel

March 11, 2016

VIA ECFS

Notice of Ex Parte

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

RE: *In the Matter of Petition of CenturyLink for a Waiver of Sections 51.907 and 51.915 of the Commission's Rules, as Applicable; Wireline Competition Bureau Seeks Comment on CenturyLink, Inc. Petition for Waiver*, WC Docket No. 15-324

Dear Ms. Dortch:

Pursuant to discussions between the undersigned, on behalf of CenturyLink, and Pamela Arluk of the Wireline Competition Bureau of the Commission on March 10, CenturyLink files the following clarification regarding its requested waiver in this proceeding. CenturyLink clarifies that the requested waiver is intended to permit CenturyLink to consolidate the study areas of multiple local exchange carriers (LECs) in a state in advance of their being merged so that each surviving Study Area may first operate under a single tariff with uniform switched access rates, participate in a single statewide Federal access tariff filing, and consolidate their eligible recovery. This waiver would permit this result as to all switched access rate elements of those LECs. This would include those falling within the scope of Rule 51.907 as well as any other switched access rate elements of these LECs (i.e. those rate elements that are addressed in CenturyLink's annual switched access transitional Intercarrier compensation tariff filings since the *USF/ICC Transformation Order*¹ as well as those switched access rate elements that were covered in CenturyLink's broader switched access annual filings prior to the *USF/ICC Transformation Order* - last filed June 16, 2011).

¹ *In the Matter of Connect America Fund, et al.*, WC Docket Nos. 10-90, *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (rel. Nov. 18, 2011) (subsequent regulatory history omitted), *aff'd sub nom.*, *In re: FCC 11-161*, Nos. 11-9900, *et al.*, 753 F.3d 1015 (10th Cir. 2104), *petitions for rehearing en banc denied*, Orders, Aug. 27, 2014, *cert. denied*, 135 S. Ct. 2072 (May 4, 2015) (Nos. 14-610, *et al.*).

Ms. Marlene H. Dortch
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Pursuant to section 1.1206(b) of the Commission's rules, this notice is being filed in this docket. Please contact the undersigned with any questions.

Sincerely,

/s/ Timothy M. Boucher

cc: (via e-mail):
Pamela Arluk
Lynne Engledow