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April 22, 2016

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 2016 FCC Safe Harbor Call Routing Declaration

Dear Ms. Dortch:

CenturyLink is pleased to provide this notice that it has filed its fourth and final Safe Harbor call routing declarations. It provides this submission pursuant to 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 confidential 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.

As the company has previously advised, CenturyLink initially had no choice but to rely on Verizon for a small volume of calls for routing of last resort to some locations, even though Verizon does not offer a Safe Harbor product and may or may not utilize another intermediate carrier in routing calls. However, by the end of the 4Q15, CenturyLink was able to completely remove Verizon as an underlying carrier and for reliability and redundancy purposes from the CenturyLink Long Distance routing. Verizon was replaced by other providers understood to be compliant with CenturyLink's Safe Harbor requirements. CenturyLink has thus continued in its Safe Harbor processing and its industry best practice of one hop routing.

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

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customers from DMS switches, but that cannot always be possible. A very small number of calls may fall into this category.

To implement Safe Harbor policies, CenturyLink carefully reviewed all manual routing decisions between January 1, 2016, and March 31, 2016. 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. With the removal of Verizon from last-resort routing, CenturyLink believes it had no manual routing in the quarter that would be an exception to CenturyLink's Safe Harbor policies.

In following up with our past commitments to the Commission, CenturyLink believes it has completed all steps consistent with the statement of CenturyLink's intent to achieve Safe Harbor routing and to further limit our routing to only one single hop in addition to our network. CenturyLink shares the Commission's interest in improving the call completion experience for American businesses and consumers. In alignment with the Safe Harbor requirements of the Order, CenturyLink anticipates that this will be its last submission of Form 480. CenturyLink will continue to provide its Safe Harbor certification on an annual basis.

Please contact me or Jason Topp (651-312-5364) if you have questions.

Sincerely,

/s/ John E. Benedict

cc: Jason Topp
Daniel Kahn
Acting Chief, Competition Policy Division