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Via ECFS

May 16, 2016

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

RE: *Amendments to New Part 4 of the Commission's Rules Concerning Disruptions to Communications, PS Docket 15-80; Proposed extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers, PS Docket 11-82; New Part 4 of the Commission's Rules Concerning Disruptions to Communications, WC Docket 04-35*

Dear Ms. Dortch:

CenturyLink met with the FCC to discuss the above-captioned proceedings. On May 12, 2016, Melissa Newman and Stacy Hartman, both of CenturyLink, met via telephone with Brenda Carr, Legal Advisor-Commissioner Pai; on May 13, 2016, Melissa Newman, in person, and Stacy Hartman, by telephone, both of CenturyLink, met with Jessica Almond, Legal Advisor-Chairman Wheeler; on May 16, 2016, Melissa Newman, in person, and Stacy Hartman, by telephone, both of CenturyLink, met with Erin McGrath, Legal Advisor-Commissioner O'Rielly.

In the meetings, CenturyLink stated that it has been supportive of the FCC's initiatives to update the current Part 4 Outage Reporting rules to reflect advancements in technology and to yield data that will be more useful in analyzing major outage events. CenturyLink also supported the FCC's proposal to define partial outages as when 80% or more of the trunks to a PSAP are blocked.

We did express concern for substantially shortening the duration for reportable simplex events from five days to 48 hours and extending outage reporting obligations to call blockages in the non-wireless access network. With respect to the former, CenturyLink believes that simplex events should not even be reportable as they have no direct effect on end users; they are transparent to them because the diversity built into the network works as intended to maintain connectivity.

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Further, we do not believe that any additional reporting is necessary for call blockages in the wireline local access network. The Commission's rules do not require such reporting to the extent there is not a "failure or degradation" of the network, and the NPRM did not cite to any instances of such failures. Moreover, reporting is unnecessary given the substantial amount of call completion data that carriers are now required to report. CenturyLink urged the FCC to focus its efforts on areas where there is a demonstrated need for additional or modified outage reporting and a tangible public safety benefit.

Pursuant to section 1.1206(b)(2) of the Commission's rules, this notice letter is being submitted to these dockets.

Sincerely,

/s/ Melissa E. Newman

Copy via email to:
Brenda Carr
Jessica Almond
Erin McGrath