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March 31, 2004

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation in CC Dockets 96-45, 98-170, 98-171, 92-237, 90-571, 99-200, 95-116, 02-33, and 01-337; WC Dockets 03-211, 03-45, and 02-361

Dear Ms. Dortch:

Yesterday John Jones and Tim Walden of CenturyTel, Inc. and I made a presentation to Chief of Staff Bryan Tramont, touching upon issues raised in each of above-captioned dockets. CenturyTel urged expeditious denial of AT&T's VOIP petition, expressed support for expanding the base of contributors to universal service, and urged that Commission actions affecting advanced services be taken in such a manner as to preserve and promote affordable broadband services in rural areas, of which CenturyTel is a premier provider. The attached materials summarize CenturyTel's points. Please direct any questions concerning this matter to me.

Very truly yours,



Karen Brinkmann

Enclosure

cc: Bryan Tramont, Chief of Staff
Office of Chairman Powell



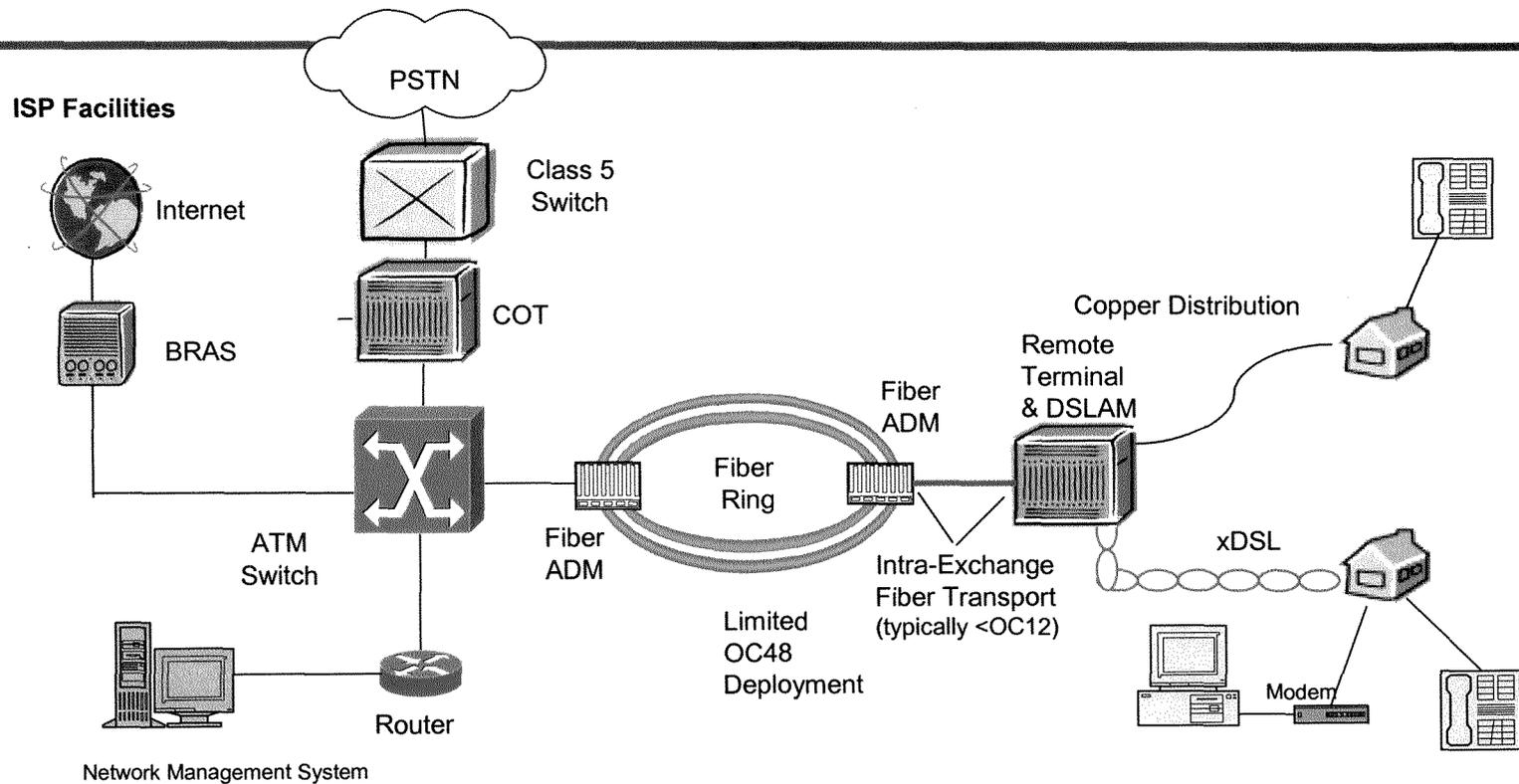
Broadband Network Investment
*"Communication Solutions to Rural
America"*

Prepared by Tim Walden
March 30, 2004

CenturyTel 's Network Focus

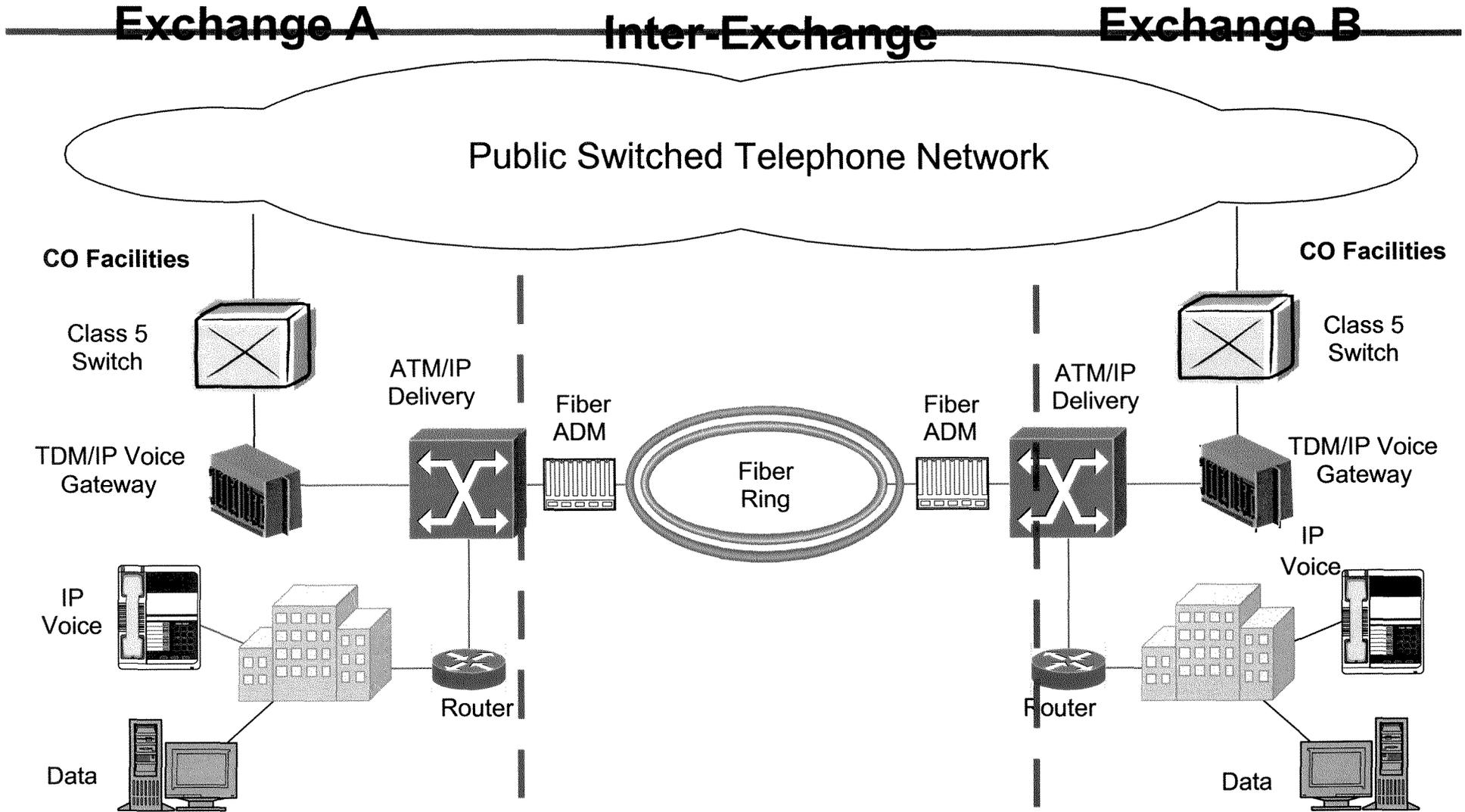
- ◆ **CenturyTel Is Focused On:**
 - ◆ **Expanding Broadband Network Objectives In Existing Markets**
 - ◆ **Enhancing Network Quality and Operational Efficiencies**
 - ◆ **A Disciplined Network Infrastructure Program**
 - ◆ **Extending Deployment of Advanced Services to New Markets**

CenturyTel – Today's Voice and Data Network



| | | | | |
|-----------------------------------|--|-----------------------------------|--|--------------------------------|
| <p>ISP Integration</p> | <p>Intra-Exchange Network</p> | <p>Fiber Transport</p> | <p>Local Distribution Network</p> | <p>Home Network</p> |
|-----------------------------------|--|-----------------------------------|--|--------------------------------|

VoIP Enterprise Networks – Voice and Data



Broadband Initiative – Where We Are Going

| | <u>Goal</u> | <u>YE 2001</u> | <u>YE 2002</u> | <u>YE 2003</u> |
|---------------------|-------------|----------------|----------------|----------------|
| • RT Miles Fiber | 10,000 | 10,630 | 15,126 | 15,886 |
| • DSL-capable A/L | 1.6 million | 1.1 million | 1.2 million | 1.5 million |
| • DSL-Exchanges | 400 | 458 | 588 | 641 |
| • ATM/IP switches | 50 | 50 | 56 | 56 |
| • C.B.G.s* | 3,050 | 4,265 | 4,434 | 4,434 |
| • STPs | 6 pairs | 4 pairs | 6 pairs | 6 pairs |
| • BB Loops (<12Kft) | 85% | 65% | 65% | 65% |

*Community Broadband Gateways



Major VoIP Implications

Security

CALEA (wiretap) compliance should be considered for all communications service providers - especially in this era of heightened security.

Public Safety & Access

- VoIP service providers must be expected to work with public safety administrators for E911 availability.
- Access for individuals with disabilities may be an issue in VoIP offerings.
- Reliability may be a major concern with some VoIP services due to power requirements.

Universal Service

- VoIP is one of several factors leading to an erosion of interstate telecom revenues.
- Current proposals to assess service providers on a 'per connection' or 'per phone number' basis must be examined for their possibly disparate impact on end-users.

Inter-Carrier Compensation –

VOIP threatens current per-minute inter-carrier compensation arrangements.

Government Funds

- Federal, State & Local tax jurisdiction issues.
- Today, service providers are characterizing their services as interstate or intrastate, enhanced vs. basic.
- Not surprisingly, providers often choose the status with the least regulatory and/or tax burden.
- "Self-help" should not be tolerated.
- Clarity of rules and consistency of enforcement is required.

Advanced Telecom Capability in CenturyTel Markets: Yesterday, Today and Tomorrow

◆ Proven

- ◆ Progressive Network Deployments
- ◆ 100% Digital 1992
- ◆ 100% one Party 1992
- ◆ NGDLC Deployments
- ◆ Carrier Serving Areas

◆ Positioned

- ◆ 67% DSL Availability
- ◆ 65% Loops < 12KFT
- ◆ 11,000 Rte Miles Fiber
- ◆ 100% CLASS Capable
- ◆ Over 4200 CBGs*

◆ Prepared

- ◆ SS7 Gateway Network
- ◆ Centralized Network Management
- ◆ ATM/FR Network
- ◆ Broadband Network
- ◆ Segmented Network Elements

* Community Broadband Gateways



Summary

- 1. CenturyTel is a facilities-based broadband provider ensuring access to advanced telecommunications capability in rural markets.**
- 2. In order to continue to promote a high level of investment in rural markets, carriers such as CenturyTel require Federal support that is sufficient and predictable.**
- 3. Spread of VOIP technology should not be allowed to threaten rural connectivity and access to advanced services.**
- 4. FCC policies must be service-provider neutral – consistent rules for comparable services in comparable areas, regardless of who the provider is.**

CENTURYTEL