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March 31, 2004

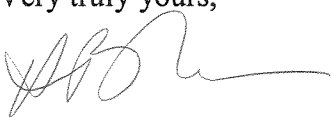
Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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

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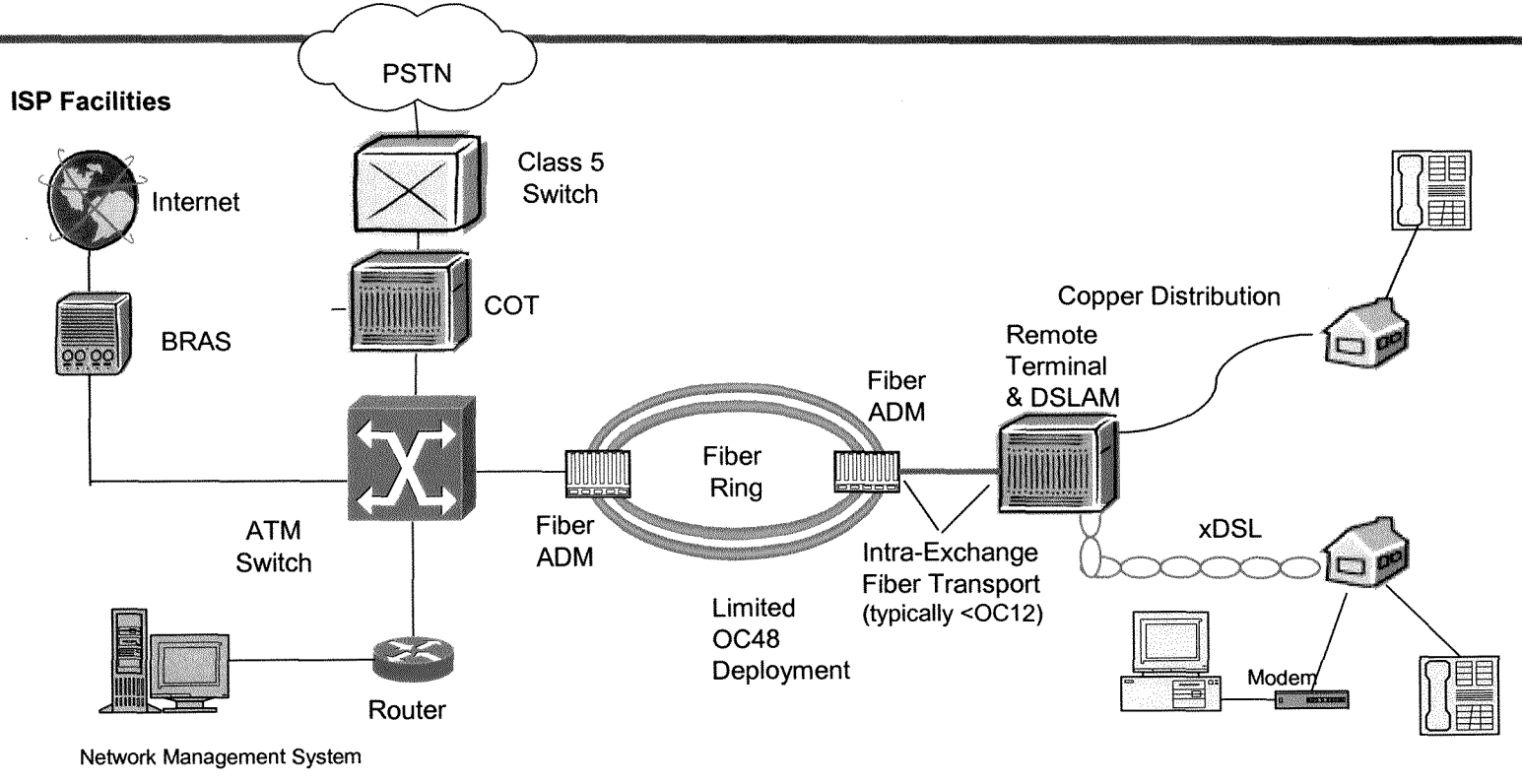
CenturyTel – Today's Voice and Data Network



ISP Integration	Intra-Exchange Network	Fiber Transport	Local Distribution Network	Home Network

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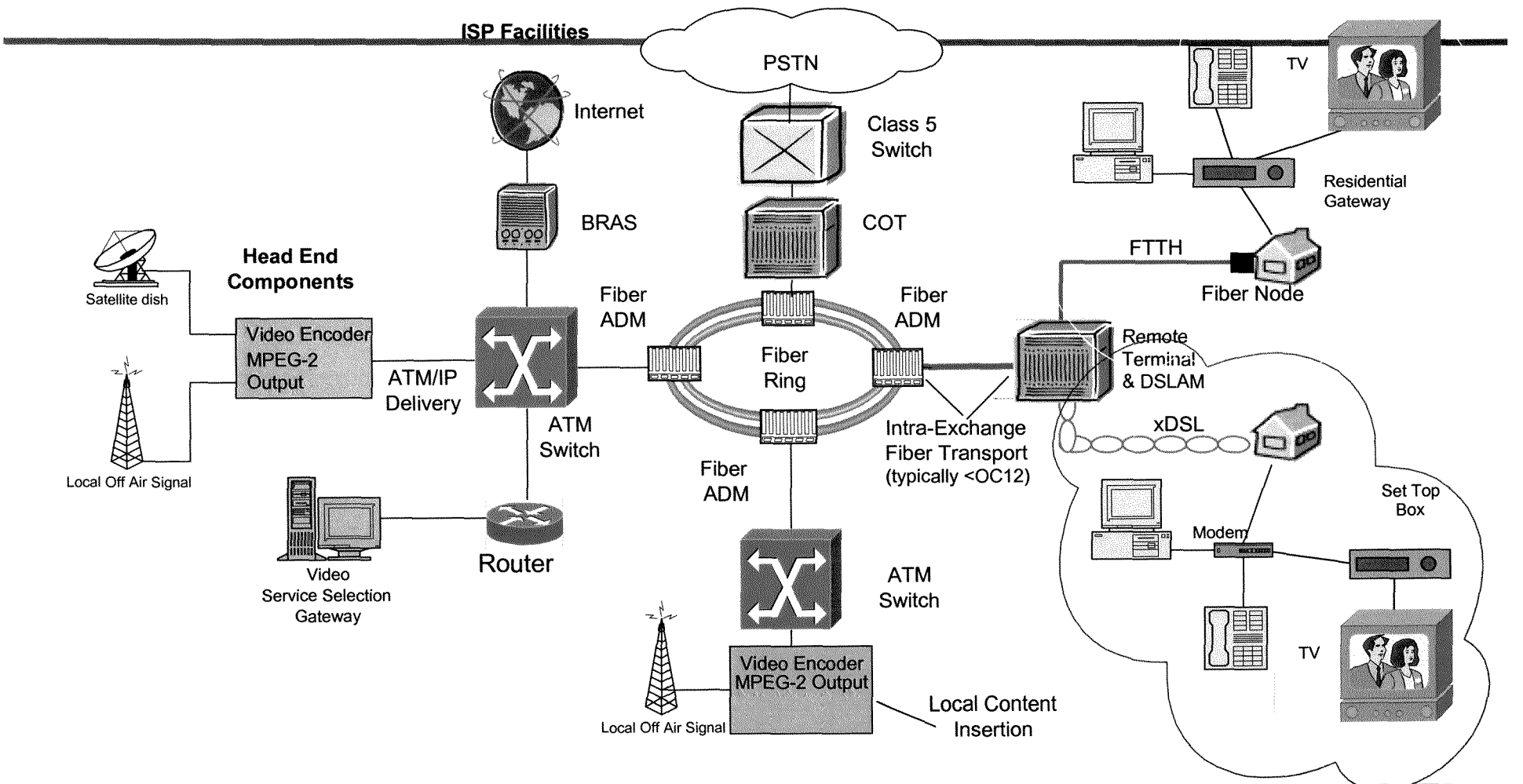
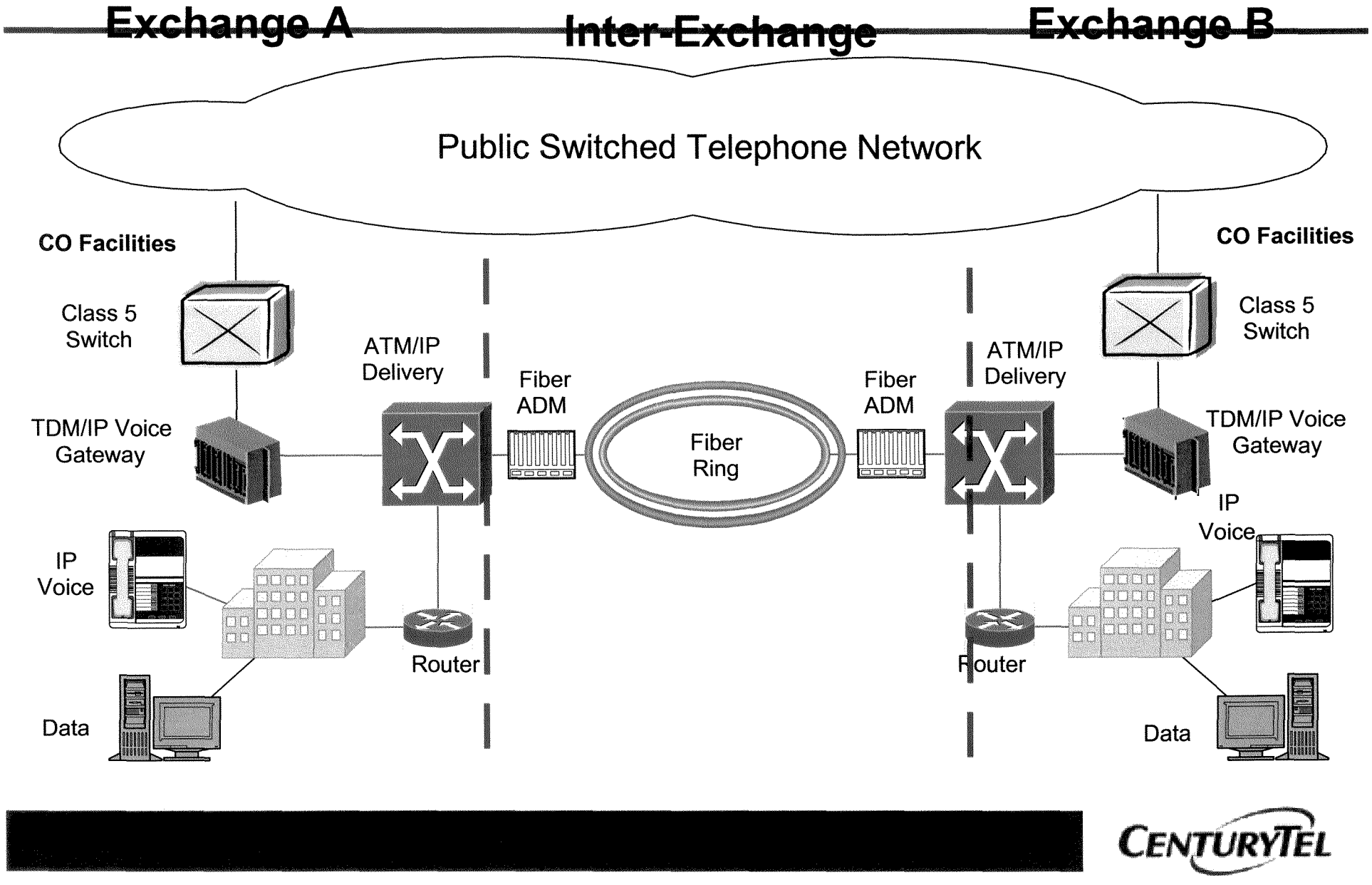
CenturyTel - Broadband Access Evolution



VoIP Enterprise Networks – Voice and Data



Broadband Initiative – Where We Are Going

	Goal	YE 2001	YE 2002	YE 2003
• 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

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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 E911availability.
- 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

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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.**

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