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November 24, 2008

EX PARTE PRESENTATION

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

Re: CenturyTel, Inc. Petition for Conversion to Price Cap Regulation and for Limited Waiver Relief, WC Docket No. 08-191

Dear Ms. Dortch:

On August 28, 2008, CenturyTel, Inc. ("CenturyTel") filed the above-captioned petition seeking to convert all but its average schedule study areas to price cap regulation, effective January 1, 2009. The Commission has received comments from interested parties, that comment cycle is now closed, and the petition ripe for action. CenturyTel continues to believe that grant of the petition, as modified below, will serve the public interest, and the comments received strongly support that position.

CenturyTel wants to improve its prospects for gaining a grant of its proposal so that it can implement its first price cap tariff on January 1, 2009. Therefore, in order to more closely follow CenturyTel's intent to make its proposal similar to the grants made by the Commission to other carriers,¹ CenturyTel hereby amends its original application as follows. These changes will make CenturyTel's proposal more like

¹ See, e.g., *Windstream Petition for Conversion to Price Cap Regulation and for Limited Waiver Relief*, WC Docket No. 07-171, 23 FCC Rcd 5294 (2008) ("*Windstream Price Cap Conversion Order*"); *Petition of Puerto Rico Telephone Company, Inc. for Election of Price Cap Regulation and Limited Waiver of Pricing and Universal Service Rules*, WC Docket Nos. 07-292, 07-291, 08-18, DA No. 08-1026 (Wir. Comp. Bur., rel. May 6, 2008) ("*Mid-size Price Cap Conversion Order*") (permitting Puerto Rico Telephone Co., Consolidated Communications, and Frontier Telephone to convert rate-of-return properties to price cap regulation).

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Windstream's and therefore allow the Wireline Competition Bureau to act on the petition pursuant to delegated authority because there will be no new or novel questions of fact or law.

First, for study areas which CenturyTel intends to withdraw from the NECA pools, CenturyTel will calculate going-in price cap rates based on actual 2007 revenue requirements and 2007 base period demand. For study areas in which CenturyTel currently files its own tariffs, CenturyTel will calculate going-in price cap rates based on January 1, 2008 rates and 2007 base period demand as Windstream did.² This is consistent with the offer made in CenturyTel's reply comments.³

Second, CenturyTel modifies its request to continue to receive access replacement universal service support so that it is based on the actual Interstate Common Line Support it received during calendar year 2007. Of course, this amount would be adjusted through the true-up process as actual data becomes available, consistent with the methodology approved for Windstream.⁴ This change will ensure that its rate and access replacement proposals are based on similar time periods and data.

Third, CenturyTel hereby withdraws its request for a waiver of the annual access filing deadline contained in Rule 69.3(h).⁵ Therefore, if this waiver petition is granted, CenturyTel would comply with Rule 69.3(h)'s filing deadlines, including the deadline that would apply for annual access tariffs due to become effective on July 1, 2009.

Fourth, CenturyTel commits to filing access rates in its January 1, 2009 filing for each of its study areas that it is withdrawing from NECA pools. Going-in price cap rates for tariffs that it currently files on its own would be based on the same rates that currently exist and would not be subject to further consolidation than exists already in these tariffs. Therefore, in the context of the initial price cap filing, CenturyTel would not implement its initially stated intention to consolidate rates for multiple study areas.⁶ If ATS rates are below the "primarily rural" target of \$ 0.0095, those rates would remain at the lower level in accordance with the CALLS rules.⁷

² *Windstream Price Cap Conversion Order*, ¶ 16.

³ Reply Comments of CenturyTel, Inc., WC Docket No. 08-191, at 4 (Sep. 24, 2008).

⁴ *Windstream Price Cap Conversion Order*, ¶ 21.

⁵ CenturyTel, Inc. Petition for Conversion to Price Cap Regulation and for Limited Waiver Relief, WC Docket No. 08-191, at 20-21 (Aug. 29, 2008).

⁶ *Id.* at 19-20.

⁷ *Windstream Petition for Conversion to Price Cap Regulation and for Limited Waiver Relief*, WC Docket No. 07-171, at 8 (Aug. 6, 2007).

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Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced docket. Please let me know if you have any questions.

Sincerely,

/s/ Gregory J. Vogt

Gregory J. Vogt
Counsel for CenturyTel, Inc.

cc: Dana Shafer
Al Lewis
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