



CenturyLink™

100 CenturyLink Drive  
Monroe, LA 71203-2041

[www.centurylink.com](http://www.centurylink.com)

September 21, 2010

William Dever  
Chief, Competition Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
Washington D.C. 20554

Colleen Heitkamp  
Chief, Consumer Policy Division  
Consumer & Governmental Affairs Bureau  
Federal Communications Commission  
Washington, D.C. 20554

**Re: Notification Pursuant to 47 C.F.R. § 64.2009(f); CC Docket No. 96-115**

Dear Mr. Dever & Ms. Heitkamp,

CenturyLink, Inc. (“CenturyLink”) hereby notifies the FCC, pursuant to 47 C.F.R. § 64.2009(f), that one of its CPNI opt-out mechanisms did not function correctly.

*Carrier Contact Information:* Susan T. Pate, Manager, Business Product Systems Integration, CenturyLink, 100 CenturyLink Drive, Monroe, LA 71203-2041. Telephone number: (318) 388-9685.

*Description of Opt-Out Mechanism:* In accordance with FCC rules, CenturyLink notifies its existing customers of their CPNI rights, including the opportunity to restrict the use of their CPNI through CenturyLink’s opt-out mechanisms, through a notice sent biennially to customers as an insert with their monthly bill. CenturyLink sent its most recent biennial notifications in September and early October of 2009. These biennial notifications describe the methods by which a customer can exercise opt-out consent, including, among other methods, toll-free numbers that, in turn, provide automated Interactive Voice Response (“IVR”) system prompts through which the customer’s opt-out exercise is documented. A substantially similar opt-out notification is provided to all new customers, which also includes a toll-free number as an available opt-out method. When a customer exercises opt-out rights via a toll-free number, the IVR system generates a file used to designate an “opt-out code” in the relevant customer account indicating the customer has opted out of CenturyLink’s use of their CPNI, including for marketing outside of the service relationship with that customer. CenturyLink has two functionally similar IVR systems used for opt-out purposes, accessed through different toll-free numbers.

*Description of Problem:* On September 16, 2010, the company discovered that the electronic process by which one of the IVR systems designates an opt-out code had not been properly recording the caller's opt-out selection for calls made to that toll-free number. We have received no customer calls or complaints to date about this error. Customers using a different toll-free number for opt-out consent were routed to another IVR system. They and customers who opted out under other mechanisms have been unaffected by this problem.

*Remedy and Implementation Timetable:* After discovering the problem, CenturyLink routed all customers dialing that toll-free number to exercise their opt-out rights to a live operator rather than to that IVR system. CenturyLink has replaced the IVR platform involved and confirmed that the new platform is working correctly. CenturyLink has begun the process of sending a new opt-out notice to the affected customers, and anticipates completing that process within the next few weeks.

*Notification of State Commission:* CenturyLink does not plan to notify state commissions of this matter, except where required by state law.

*Customer Notice:* Attached is a copy of the relevant customer notices that were sent to customers.

Please let me know whether you have any questions.

Sincerely,

/s/ Susan T. Pate

Susan T. Pate  
Manager, Business Product Systems Integration

Attachments