



CenturyLink™

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January 27, 2011

FILED/ACCEPTED

JAN 27 2011

Federal Communications Commission  
Office of the Secretary

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: REDACTED MATERIAL ENCLOSED – FOR PUBLIC INSPECTION**  
*Special Access Rates for Price Cap Local Exchange Carriers, WC Docket  
No. 05-25; AT&T Corp. Petition for Rulemaking to Reform Regulation of  
Incumbent Local Exchange Carrier Rates for Interstate Special Access  
Services, RM-10593.*

Dear Ms. Dortch:

CenturyLink submitted today confidential financial information for the record pursuant to the Second Protective Order issued in the above-captioned dockets on December 27, 2010. In accordance with the Second Protective Order, CenturyLink hereby files with your office a redacted cover letter for public inspection along with the attachment. As all of the financial information on disc is designated as highly confidential under the Second Protective Order, a redacted copy would be the same as the template provided with the data request and, accordingly, is not included pursuant to the instruction of Elizabeth McIntyre and Marvin Sacks. In addition, two copies of the highly confidential information were delivered to Elizabeth McIntyre in the Wireline Competition Bureau, and one copy was filed under separate cover with your office.

Please contact me if you have any questions or need anything else in regard to this submission.

Sincerely,

Jeffrey S Lanning

Enclosures

cc: Elizabeth McIntyre  
Marvin Sacks

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# **CENTURYLINK SUBMISSION OF JANUARY 27, 2011**

## **RESPONDING TO SPECIAL ACCESS DATA REQUEST**

### **OF OCTOBER 28, 2010—DA 10-2073**

#### **III.E INCUMBENT LEC ANSWERS FOR FAYETTEVILLE, NC; LAS VEGAS, NV; LIMA, OH; MANSFIELD, OH; AND OCALA, FL**

Five of the twenty-five Metropolitan Statistical Areas (MSAs) listed in Attachment C to the *Data Requested in Special Access NPRM, DA 10-2073 (Oct 28, 2010) (Data Request)*, are ones in which CenturyLink is the primary incumbent local exchange carrier (ILEC). These are Fayetteville, NC; Las Vegas, NV; Lima, OH; Mansfield, OH; and Ocala, FL. This submission provides information for the wire centers listed in the Commission's template for these five MSAs. CenturyLink is continuing to work on responses for the wire centers in the remaining twenty MSAs where it has ILEC facilities and provides services covered by the data request.

In Column E, CenturyLink provides the total number of dedicated circuits provisioned and operating as of December 31, 2011 in each of the specified wire centers. This figure includes all such circuits without aggregation, even where several of the circuits are provided over the same wire.

In Columns M and N, CenturyLink provides figures for circuits provisioned in the two higher capacity categories specified by the Commission. These circuits are nearly always provided over fiber. In Columns T and U, CenturyLink provides figures for circuits provisioned in the two lower capacity categories specified by the Commission. These circuits are usually provisioned over copper.

CenturyLink does not use any hybrid-fiber-coax (HFC), wireless, or satellite facilities to provide covered services in the specified MSAs.

In accordance with the Clarification of Data Requested in Special Access NPRM, DA 10-2413 (Dec. 23, 2010), CenturyLink is providing figures for the numbers of digital subscriber line (DSL) circuits provisioned in each of the specified wire centers. These are not provided over the kinds of facilities as the other high-capacity services about which the Commission seeks data. Accordingly, CenturyLink is providing the business DSL counts separately, using the columns AC and AD in the template provided by the Commission.

Finally, in this submission, CenturyLink provides the number of cell tower locations served in each of the specified wire centers in column AU.

It is worth noting that CenturyLink is providing these answers from provisioning data rather than billing data. As CenturyLink has explained to the Commission in connection with its request for a temporary waiver of the one-day local number portability requirement, CenturyLink is in the process of converting the legacy Embarq customers to the new CenturyLink billing systems, which are based on the platform that CenturyTel was using prior to the merger of the two companies to form CenturyLink. In addition, CenturyLink provides some of the circuits about which the Commission is asking as wholesale circuits and others as retail circuits. CenturyLink maintains separate billing systems for wholesale and retail accounts, which would

make it difficult to accurately respond to the Data Request using those databases. Therefore, CenturyLink chose to use a provisioning database to collect the data regarding circuits sold.

Using the provisioning database, CenturyLink provides an accurate count of working circuits in the specified wire centers as of December 31, 2010, allocated among the four capacity categories specified by the Commission. These counts differ from the methodology specified for units sold over fiber or copper in the Data Request, however, in that they are counted separately even if they are provisioned over the same facility. In addition, the allocation of circuits to copper and fiber is based on an assumption that is nearly always correct for the highest capacity circuits (over fiber), and the lowest capacity circuits (over copper). The assumption is less reliably accurate for circuit in the middle of the range of capacities, as they may be provided in practice over either copper for fiber.

CenturyLink has worked diligently to answer the Commission's questions. With respect to the questions regarding end-user connections and their maximum capacities (Columns G-J and P-S), however, CenturyLink has not been able to identify a methodology using existing databases that can generate complete and reliable answers. Nearly all of CenturyLink's operating companies, and most of the lines they serve, are classified as rural under the Telecommunications Act of 1996. We have become expert at serving areas with lower population densities and doing so efficiently using limited resources and capabilities. In particular, CenturyLink operations are substantially de-centralized in some important operational respects, with substantial local market control. CenturyLink does not currently maintain a single database that records the specific locations of the facilities upon which active circuits are provisioned. Nor, can CenturyLink use an automated process to identify how many circuits are provisioned over fiber or copper.

With respect to the questions regarding connections sold, CenturyLink is also providing answers different than specified in the Data Request because of the availability of data in CenturyLink's current systems. CenturyLink is not aggregating all circuits provided over a single facility in this filing as this information is not readily available at this time. CenturyLink will continue to work on developing a feasible solution for collecting the data.