

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Reliability and Continuity of Communications Networks, Including Broadband Technologies)	PS Docket No. 11-60
)	
Effects on Broadband Communications Networks of Damage or Failure of Network Equipment or Severe Overload)	PS Docket No. 10-92
)	
Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks)	EB Docket No. 06-119

COMMENTS OF CENTURYLINK

CenturyLink submits these comments in response to that portion of the Federal Communications Commission’s (FCC) above-captioned *Notice of Inquiry (NOI)*¹ concerning the proposed termination of related proceedings -- PS Docket No. 10-92, *Effects on Broadband Communications Networks of Damage or Failure of Network Equipment or Severe Overload (Survivability NOI)* and EB Docket No. 06-119, *Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks (Katrina Panel)*.² The FCC proposes to terminate these proceedings because the issues presented in this *NOI* “are interrelated to and overlap with issues raised in both the *Survivability NOI* and the *Katrina Panel* proceeding.”³

¹ *In the Matter of Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket No. 11-60, *Effects on Broadband Communications Networks of Damage or Failure of Network Equipment or Severe Overload*, PS Docket No. 10-92, *Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*, EB Docket No. 06-119, Notice of Inquiry, FCC 11-55 (rel. April 7, 2011).

² *Id.* ¶ 51.

³ *Id.*

While proposing to terminate the proceedings, the FCC also proposes to “consider the record of the two terminated proceedings, to the extent relevant, in this proceeding.”⁴

CenturyLink filed comments responding to the *Survivability NOI* and in the *Katrina Panel* proceeding.⁵ In the *Katrina Panel* proceeding, CenturyLink commented on the independent panel’s recommendations concerning pre-positioning for disasters (readiness checklist and federal outage and infrastructure reporting), recovery coordination (credentialing, emergency responder status, and collaboration within and between industry and government) and emergency responder communications (911/E911 preparedness and back-up public safety answering points). In response to the *Survivability NOI*, CenturyLink stated that the nation’s broadband networks are sound and secure. It emphasized that broadband network services providers operate in a competitive marketplace and have compelling financial and public interest incentives to fulfill customer service continuity expectations. It concluded that there is no need for prescriptive action by the FCC concerning the security or survivability of broadband networks. CenturyLink anticipates commenting on the *NOI*’s inquiries concerning continuity of service, broadband network reliability and resiliency, and action by the FCC.

CenturyLink supports the FCC’s proposal to terminate the *Survivability NOI* and the *Katrina Panel* proceeding. It believes that the matters raised in those proceedings are either sufficiently related to matters raised by this *NOI* or matters raised in other open proceedings. Any unresolved matters from either the *Survivability NOI* or the *Katrina Panel* proceeding can be addressed in this proceeding or the other related proceedings. There would be no harm

⁴ *Id.*

⁵ See Comments of Qwest Communications International Inc. (QCII) filed in PS Docket No.10-92 on June 25, 2010, and Comments of Qwest Services Corporation (QSC) filed in EB Docket No. 06-119 on August 7, 2006. QCII is the parent company of QSC. On April 1, 2011, QCII became a wholly owned subsidiary of CenturyLink.

caused to interested parties or the public by terminating the *Survivability NOI* or the *Katrina Panel* proceeding and doing so would serve the public interest by promoting efficiency. Accordingly, the FCC should terminate PS Docket No. 10-92 and EB Docket No. 06-119 as proposed.

Respectfully submitted,

CENTURYLINK

By: /s/ Lawrence E. Sarjeant
Lawrence E. Sarjeant

1099 New York Avenue, NW
Suite 250
Washington, DC 20001
202-429-3112
Lawrence.sarjeant@centurylink.com

Its Attorney

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