



CenturyLink™

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October 20, 2011

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

**SUBMISSION FOR THE RECORD**

*Re: Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109; Universal Service Contribution Methodology, WC Docket No. 06-122; Numbering Resource Optimization, CC Docket No. 99-200; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98; Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68; IP-Enabled Services, WC Docket No. 04-36.*

Dear Ms. Dortch:

CenturyLink files this submission to the record in support of the ABC Plan filed on July 29, 2011 in the above-captioned dockets.<sup>1</sup> Specifically, CenturyLink explains that the deployment costs estimated in the model referenced by the ABC Plan are levelized over the useful lives of the network elements that would be deployed, and the estimates of support needed are calculated on a recurring basis for a period of time.

As a reference point for comparison, CenturyLink submits its experience of the incremental capital investment required on a one-time rather than levelized basis. In connection with its filing for support pursuant to the American Recovery and Reinvestment Act, Qwest (which is now part of CenturyLink) estimated the capital investment required to build broadband to the lowest-cost unserved locations in its rural footprint (excluding the top 48 MSAs) to be \$1774 per living unit. In light of the continued build-out of broadband in those areas, including in connection with commitments made in connection with the CenturyLink merger, the figure that would apply to the lowest-cost areas that are unserved by any provider is significantly

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<sup>1</sup> Letter from Robert W. Quinn, Jr., AT&T, Steve Davis, CenturyLink, Michael T. Skrivan, FairPoint, Kathleen Q. Abernathy, Frontier, Kathleen Grillo, Verizon, and Michael D. Rhoda, Windstream, to Marlene H. Dortch, FCC, CC Docket Nos. 01-92, 99-200, 96-98, 99-68; WC Docket Nos. 05-337, 07-135, 10-90, 03-109, 06-122, 04-36; GN Docket No. 09-51 (filed July 29, 2011).

higher. Therefore, CenturyLink estimates that the incremental investment required to deploy broadband capable of delivering 4 Mbps download speed in the low-density, high-cost rural areas that are currently unserved with broadband likely starts at over \$2000 per location. Moreover, it increases rapidly thereafter as a network provider moves to even less-dense areas.

Pursuant to Section 1.1206(b) of the Commission's rules, this submission for the record is being filed in the above-referenced dockets. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey S Lanning". The signature is written in a cursive, slightly slanted style.

Jeffrey S Lanning

cc: Amy Bender  
Sharon Gillett  
Zachary Katz  
Carol Matthey  
Steve Rosenberg  
Michael Steffen