



**CenturyLink™**

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January 19, 2012

**VIA ECFS**

*Ex Parte Filing*

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

**RE: Correction and Update Regarding CenturyLink Blocking Options in**  
connection with prior comments filed in *In the Matter of Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges (“Cramming”)*, CG Docket No. 11-116; *Consumer Information and Disclosure*, CG Docket No. 09-158; *Truth-in-Billing and Billing Format*, CC Docket No. 98-170

Dear Ms. Dortch:

On October 24, 2011, CenturyLink filed comments in response to the *Notice of Proposed Rulemaking*<sup>1</sup> that sought comment on three additional proposed truth-in-billing rules. The Commission inquired whether the proposed rules would assist customers in detecting and preventing “cramming,” generally referred to as the placement of unauthorized charges on a customer’s telephone bills, sometimes fraudulently.

Correction to Description of Legacy CenturyLink Blocking Option

In the comments CenturyLink filed in October, 2011, it addressed the matter of local exchange carrier blocking of third-party charges on carriers’ bills. It described its existing blocking options in a footnote (describing both legacy CenturyLink and legacy Qwest blocking options), specifically footnote 12.<sup>2</sup>

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<sup>1</sup> *In the Matter of Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges (“Cramming”); Consumer Information and Disclosure; Truth-in-Billing and Billing Format*, FCC 11-106, Notice of Proposed Rulemaking, CG Docket Nos. 11-116 and 09-158, CC Docket No. 98-170, 26 FCC Rcd 10021 (2011) (*Notice*); 76 Fed. Reg. 52625 (Aug. 23, 2011).

<sup>2</sup> From CenturyLink October 24, 2011 filing at page 6, note 12: “CenturyLink currently has two types of blocking functions (reflecting one blocking option available before its merger with Qwest and an additional one after) that it offers its customers for free: one involves a blocking option made available to a customer at the point a third-party billing dispute is raised regarding a

Since filing its October, 2011 comments, CenturyLink has determined that the description it provided of its blocking options was in error. The purpose of this filing is, in part, to correct that error. Additionally, CenturyLink takes this opportunity to supplement the existing record with a copy of the text of a billing insert regarding cramming that was sent/is being sent to CenturyLink customers in December, 2011 and January, 2012, in an effort to further educate its customers about the topic.

In October, 2011, CenturyLink stated that its legacy CenturyLink companies (contrasted with its legacy Qwest companies) utilized a system/mechanized block that blocked, among other charges, 1+ and other types of telecommunications service billings. That was not accurate. The legacy CenturyLink company block did not (and does not) block presubscribed 1+ charges from carriers or other telecommunications service billing (such as collect or third-party calls). In the indented language following below, CenturyLink revises its description to make it accurate.

#### Change in Legacy Qwest Blocking Option

Moreover, since CenturyLink's filing in October of 2011, its legacy Qwest operations have changed its non-mechanized blocking option. The blocking option now available to customers is broader than stated in October, basically blocking all third-party charges. That broader blocking functionality is also described below in the indented text.

#### Current Description of CenturyLink Blocking Options

Taking both of the above facts into account, below is a corrected description of the blocking option as it existed (and continues to exist) for legacy CenturyLink companies in October of 2011, as well as a more current description of the legacy Qwest blocking options available to customers.

CenturyLink currently has two types of blocking functions: a mechanized one that existed in the legacy CenturyLink before its merger with Qwest, and a non-mechanized one that operates in its legacy Qwest operations. Both blocking options are offered for free. The legacy CenturyLink blocking option systematically blocks all non-telecommunications third-party charges (but does not block telecommunications charges, such as 1+ or collect calls). The legacy Qwest block, until recently, operated to block only those vendor charges that a

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particular vendor, and involves CenturyLink advising the billing aggregator to no longer send billings from that particular vendor (meaning that the block does not stop charges from other vendors associated with that or other billing aggregators); the other involves a block of all third-party charges (including any 1+ carrier charges) associated with all billing aggregators, which is activated through billing codes.”

customer complained about. Changes have been made to that blocking option such that now, when a legacy Qwest customer complains about an unauthorized third-party charge, legacy Qwest advises the billing aggregator to block all future third-party billing, including third-party telecommunications charges (such as 1+ and collect calls).

CenturyLink Cramming Bill Insert Sent December, 2011 and January, 2012

Also as part of this filing, CenturyLink takes this opportunity to provide the Commission with a bill insert that it sent/is sending to its customers in December 2011/January 2012 (Attachment A). CenturyLink hopes that providing this information will better educate its customers regarding third-party billing and cramming in particular. It should be noted that some of the text of the notice was drafted in line with material posted by the Commission on its website.

CenturyLink regrets the confusion regarding its description of its blocking options and trusts that this correction and update will provide additional, accurate information for the Commission's consideration going forward. CenturyLink requests that this correction and update regarding its October 24, 2011 Comments be included in the record of each of the above-referenced proceedings.

Sincerely,

/s/ Kathryn Marie Krause,  
Counsel for CenturyLink

cc: John B. Adams [john.b.adams@fcc.gov](mailto:john.b.adams@fcc.gov)  
Kurt Schroeder [kurt.schroeder@fcc.gov](mailto:kurt.schroeder@fcc.gov)

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## **Attachment A**

CenturyLink Cramming Bill Insert  
December 2011 and January 2012

## IMPORTANT INFORMATION

CenturyLink is fighting "cramming," which is the practice of adding charges for products or services to a customer's telephone bill without the customer's authorization. Like other local phone companies, CenturyLink bills for services other companies provide such as: long distance service, voice mail, web design and web hosting services, club memberships, music and ringtone downloads, diet plans, internet services or paging. This billing practice serves as a convenience for customers who want one-stop billing for all their communications services. Reputable companies use this billing practice largely without incident. Occasionally, however, some companies may add charges without your full understanding or approval. To help prevent cramming, CenturyLink offers the following tips:

- Review your phone bill for charges you don't recognize, in the same way you would review your monthly credit card and bank statements.
- Read the fine print carefully on any special promotion, sweepstakes, rebate, etc., that requires your signature. You may be giving "permission" to add services to your phone bill.
- Educate those in your household about "hidden authorization" ploys. Members of your family or business could unknowingly authorize services simply by dialing certain 900 numbers or pushing buttons on the phone to answer telemarketers' questions.
- Do not disclose any information, such as your credit card numbers, social security number, or telephone number on any sweepstakes or raffle tickets. This information may be used to scam you.



Qwest is now CenturyLink.

- Avoid filling out contest entry forms if the language on the form appears confusing or unclear.
- Be wary of faxes, e-mails, voice mail or pages that ask you to call an unfamiliar phone number.
- Listen carefully to voice prompts when you make a phone call and reach an answering machine.
- Make certain you know all the services you have ordered. You could unwittingly accept or approve charges for a call or other services.

If you believe you may have been crammed, contact CenturyLink to remove the charge and request that these types of charges be blocked from future bills.

Even if you haven't been crammed, but want to know what can be done to keep other companies from billing their services in your telephone bill, contact CenturyLink and ask about a third-party bill block which is available at no charge to you.

To learn more about cramming, refer to the FCC's website for additional information: <http://www.fcc.gov/guides/cramming-unauthorized-misleading-or-deceptive-charges-placed-your-telephone-bill>