

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
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 a 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

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**COMMENTS OF NORTH COUNTY COMMUNICATIONS CORP. IN RESPONSE TO  
CENTURYLINK, INC. PETITION FOR LIMITED WAIVER**

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**INTRODUCTION**

Pursuant to Public Notice DA 12-104, North County Communications Corp. (“NCC”) submits its comments regarding the CenturyLink, Inc. (“CenturyLink,” f/k/a Qwest) petition for limited waiver of call signaling rules (“Petition”). CenturyLink has not demonstrated good cause for the requested waiver, and thus, the Commission should deny the Petition.

**DISCUSSION**

In its Petition, CenturyLink requests that it be exempt from transmitting charge number (“CN”) or calling party number (“CPN”) via MF signaling. Pet. at 6-8. CenturyLink’s Petition falls well short of demonstrating technical infeasibility. Instead, CenturyLink posits summarily

that the transmission of CN and CPN is technically infeasible where MF is utilized. *Id.*

CenturyLink provides no affidavits from its in-house switch experts to describe why compliance is technically infeasible. In addition, CenturyLink provides no documentation about its switches or what capabilities exist for complying with the new rules. Furthermore, CenturyLink provides no declarations from its switch manufacturers to support claims of technical infeasibility. In short, CenturyLink creates from whole cloth an excuse of technical infeasibility.

In a recent interconnection agreement arbitration, in which NCC sought delivery of ANI over its MF interconnection trunks, CenturyLink (then Qwest) claimed technical infeasibility but admitted that it never “discuss[ed] its switches’ capabilities with its switch manufacturers’ representatives.” *See* NCC Post-Hearing Exceptions Brief, *In the Matter of Qwest Corporation’s Petition for Arbitration and Approval of Interconnection Agreement with North County Communications Corporation of Arizona*, Ariz. Corp. Comm’n, Docket Nos. T-01051B-09-0383 and T-03335A-09-0383, at 3, n.7 (citing Arbitration Transcript, 53:17-25, 54:1-9) (a copy of that page of the Exceptions Brief is attached hereto as Exhibit A). Exacerbating matters, Qwest refused to provide NCC with names and telephone numbers of its switch manufacturer technical representatives.

NCC knows that ANI can be transmitted over MF interconnection trunks because it has done so with another LEC that uses Northern Telecom DMS switches. In addition, NCC contacted Lucent, which confirmed that ANI could be delivered over MF interconnection trunks with no switch modifications. *See* Lucent January 22, 2011 email to Todd Lesser (a copy of which is attached hereto as Exhibit B).

Although the Commission recognizes the validity of MF signaling and the importance of providing ANI, CenturyLink refuses to send or receive ANI over MF interconnection trunks,

despite the fact that CenturyLink provides ANI via MF signaling on long distance (e.g., FGD) trunks to IXCs and 911 trunks. Accordingly, it is inaccurate for CenturyLink to claim that it cannot transmit ANI, CN or CPN via MF signaling. Moreover, CenturyLink claims it cannot retransmit ANI, CN or CPN from MF carriers to carriers using SS7 signaling; however, that inability is CenturyLink's responsibility because it refuses to accept ANI from MF carriers. NCC is flummoxed by CenturyLink's continued efforts to bury its head in the sand where MF signaling and ANI are concerned.<sup>1</sup>

### **CONCLUSION**

Without supporting documentation, CenturyLink has failed to demonstrate good cause. Accordingly, the Commission should deny the Petition. At the very least, the Commission should reject the Petition and require CenturyLink to refile with adequate supporting documentation so that interested parties can comment on substantive issues and not on theoretical, unsupported statements.

Respectfully submitted,

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Dated: February 29, 2012

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<sup>1</sup> NCC even offered its switch experts to Qwest to configure the switches to send ANI over MF signaling.