



**Melissa E. Newman**  
Senior Vice President  
Federal Policy and Regulatory Affairs  
1099 New York Avenue NW, Suite 250  
Washington, DC 20001  
202.429.3120

EX PARTE

February 22, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: *In the Matter of AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of the National Telecommunications Cooperative Association for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Docket No. 12-353*

Dear Ms. Dortch:

On February 21, 2013, Melissa Newman, in person, and Craig Brown, Tim Boucher, Lisa Hensley Eckert, Carolyn Hammack, Glenda Weibel, Aaron Jones and Justen Davis, by telephone, all of CenturyLink, met with Michael Steffen, Carol Matthey, Sean Lev, Jonathan Chambers, Rebekah Goodheart, Claude Aiken, Henning Schulzrinne, Mindel de la Torre, Steve Wildman and Kate Dumouchel.

CenturyLink met with the Technology Transitions Policy Task Force to discuss the ATT and NTCA Petitions. CTL outlined its three overriding principles that should govern in this transition. First, regulatory obligations should apply in the same manner to all providers of IP services. Second, no regulation should be applied in an all IP world unless it is shown to be useful and necessary, based on real-world experience. And, third, the FCC should establish flexible guidelines for the transition to IP, rather than one-size-fits-all standards and deadlines. CenturyLink has operations in many rural areas and we are exclusively a wireline network. Our transition to IP is likely to be more measured than companies who serve predominantly urban/suburban areas or have a wireless network. We noted that the IP transition is a multi-step, capital intensive process, which will take years, subject to sound business planning for modifying internal systems and replacing the TDM network with an IP network.

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Pursuant to Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this ex parte presentation is being filed for inclusion in the records of the above-referenced proceedings.

Sincerely,

/s/ Melissa Newman

Copy via email to

Michael Steffen

Carol Matthey

Sean Lev

Jonathan Chambers

Rebekah Goodheart

Claude Aiken

Henning Schulzrinne

Mindel de La Torre

Steve Wildman

Kate Dumouchel