



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

NOTICE OF EX PARTE

August 23, 2013

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

Re: *Improving 9-1-1 Reliability*, PS Docket. No. 13-75; *Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket No. 11-60

Dear Ms. Dortch:

On August 22, 2013, Stacy Hartman, Jeanne Stockman and Melissa Newman, all of CenturyLink, met separately with Louis Peraertz of Chairwoman Clyburn's office and with Jeff Goldthorp and Michael Connelly of the Public Safety and Homeland Security Bureau to discuss the above-captioned proceedings.

In these meetings, CenturyLink discussed its concerns about the burden a circuit auditing requirement would pose. CenturyLink also explained how the timing and frequency of any certification requirement that may be adopted may exacerbate that burden. Sufficient lead time – both for any initial and subsequent certifications – must be provided to afford carriers adequate time to conduct audits and other work that may be required. To mitigate this concern, CenturyLink recommended that carriers be required to audit a sampling of their circuits. CenturyLink also expressed concerns about how instances of nonconformance with best practices would be handled within a certification process. Finally, CenturyLink noted that backup power requirements of 24 hours are generally reasonable and that longer backup power requirements for only certain facilities would be burdensome while having a questionable impact on improving 911 functionality overall.

Sincerely,

/s/ Melissa Newman

copy via email to:
Louis Peraertz
Jeff Goldthorp
Michael Connelly