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**VIA ECFS**

**EX PARTE**

September 18, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 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.<sup>1</sup> In these meetings, CenturyLink discussed its concerns about proposed circuit auditing and tagging requirements and the substantial costs these requirements would impose on the company. CenturyLink submits this letter to provide the Commission more detailed cost information.

CenturyLink has investigated the projected costs associated with auditing and tagging its 911 circuits and estimates it would cost the company approximately \$1.3 million annually to accomplish these tasks. This estimate includes seven (7) communications technicians whose sole job function would be to perform circuit auditing, along with necessary engineering and supervisory personnel. With this level of staffing working on a full-time basis, CenturyLink estimates it would take approximately 24 months to audit all of the 911 circuits in its network. This estimate also includes the man-hours associated with verifying and tagging critical circuits in central offices across CenturyLink's nationwide network. CenturyLink estimates that

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<sup>1</sup> See Letter to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission from Melissa E. Newman, CenturyLink, PS Docket Nos. 13-75 and 11-60, filed Aug. 23, 2013.

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approximately 80% or roughly 2,875 of its central offices would need to be visited to verify the audit results and to verify and update critical circuit tags. This estimate is conservative in that it does not include any truck roll costs that would be incurred for unmanned central offices, which would run an additional \$400-500 per visit.

To mitigate the financial and other burdens associated with extensive manual circuit auditing and tagging, CenturyLink recommends that to the extent any system auditing requirement is adopted, that such audits be based only on a sampling of a carrier's circuits. A sampling approach would yield a comparable level of confidence and theoretical accuracy as manual auditing. Thus, sampling should be considered by the Commission as a workable means of strengthening the reliability and resiliency of the 911 network while appropriately balancing the costs and benefits of such measures.

Sincerely,

/s/ Jeanne W. Stockman

cc: (via email): Louis Peraertz  
Jeff Goldthorp  
Michael Connelly