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NOTICE OF EX PARTE

October 23, 2013

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

Re: *Rural Call Completion*, WC Docket Number 13-39

Dear Ms. Dortch:

On October 23, 2103, Jeb Benedict and Mary Retka of CenturyLink spoke by telephone with Nick Degani, legal advisor to Commissioner Ajit Pai.

CenturyLink answered questions about call routing, the mechanics of call signaling, and some of the elements of call records. CenturyLink also described the costs of processing, reporting, and storing data as contemplated in a proposal under consideration by the Commission.

With respect to the regulatory burdens, CenturyLink expressed its concern about the costs for the industry associated with data collection and storage. Those industry costs include potentially extensive IT work, modification of switches, and considerable storage costs, even for carriers meeting a proposed "safe harbor." In addition to these direct costs are the indirect effects of these regulatory burdens, as every dollar spent implementing, capturing, processing, reporting, and storing this data is a dollar not available for other IT work, IP network upgrades, and broadband investment.

CenturyLink emphasized that it alone handles 2.5 billion minutes of use every month over its long distance networks. It estimates that a carrier could incur costs of $7.5 million to $10.5 million to set up the storage hardware, develop the reporting, and pay the requisite license fees to meet the proposed requirements under consideration by the Commission. Data storage of the magnitude under consideration in this proceeding, even if limited to a three month cycle, would range from $2.8 million to $4.3 million annually, including maintenance, software, and hardware support. Given such costs, the currently assumed "safe harbor" the Commission is contemplating would provide insufficient regulatory relief for long distance carriers that limit use of intermediate carriers to two and may frustrate efforts to promote commitments to industry best practices.

CenturyLink also sought to convey that requiring retention of SS7 signal cause code would be unreasonable. Such a specific requirement would be hugely expensive to meet, and it is unnecessary to call out specific types of signaling when equivalent types of records would be available elsewhere in other call detail records. CenturyLink explained that, in any order or rules, the Commission should utilize descriptive or functional terms, rather than dictating specific types of records that may needlessly inflate compliance costs.

CenturyLink also reiterated that any reporting be done collectively for affiliates, as long distance routing generally does not distinguish between affiliates, and that call hand-offs between affiliates should not be counted as exchanging traffic to intermediate providers. Similarly, tandem providers should not be counted as intermediate providers for call completion purposes as they do not select call routing. CenturyLink also noted that the Commission should ensure that any discussion of long distance call routing focuses on the path from the long distance carrier, not from the originating end office or the access tandem for the long distance carrier.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the above-referenced dockets. Please contact me if you have any questions.

Sincerely,

/s/ John E. Benedict

Copy via email to:
Nick Degani