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Via ECFS

March 7, 2014

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

**Re: In the Matter of Connect America Fund, WC Docket No. 10-90:
CenturyLink Rural Broadband Experiment Expression of Interest**

Dear Ms. Dortch,

CenturyLink is pleased to inform the Commission of its interest in participating in one or more rural broadband experiments.¹ CenturyLink provides data, voice and managed services in local, national and select international markets through its high-quality advanced fiber optic network and multiple data centers for businesses and consumers. CenturyLink is a global leader in cloud infrastructure and hosted IT solutions for enterprise customers, and it provides facilities-based multichannel video programming to approximately 175,000 customers in 21 markets.

CenturyLink operates an extensive 240,000 route-mile fiber network that spans the U.S. from coast to coast, as well as over 280,000 route-miles of owned and leased transport network internationally. CenturyLink has approximately 13 million access lines and 6 million broadband customers. Of its access lines that are broadband-enabled, approximately 65% have available broadband speeds of at least 10 mbps. CenturyLink passes approximately 8 million homes with fiber-to-the-node.

At the same time, CenturyLink's incumbent local exchange service territory includes many rural communities and areas of low household density, making CenturyLink a recognized leader in providing telecommunications services in the highest cost areas of the country. In fact, over 35% of our wire centers have a local loop density of fewer than 10 access lines per square mile. Some of these wire centers serve customers with local loops in excess of 75 miles. Accordingly,

¹ *In the Matter of Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Connect America Fund; Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Numbering Policies for Modern Communications*, GN Docket Nos. 13-5, 12-353; WC Docket Nos. 10-90, 13-97; CG Docket Nos. 10-51, 03-123, Order, Report And Order And Further Notice Of Proposed Rulemaking, Report And Order, Order And Further Notice Of Proposed Rulemaking, Proposal For Ongoing Data Initiative, FCC 14-5 (Jan. 31, 2014) (*Technology Transitions Order*), ¶ 105.

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CenturyLink submits that its participation in rural broadband experiments may provide the Commission valuable information regarding the costs and funding needs associated with deploying high-speed broadband networks in high-cost, low-density areas.

CenturyLink supports the Commission's ongoing effort to use the Connect America Fund (CAF) to support broadband deployment where it would not otherwise be available. It is important, as explained in the Notice, that these rural broadband experiments do not delay or detract from implementation of CAF Phase II. In particular, this process should not undercut CAF Phase II implementation decisions already made by the Commission and the Wireline Competition Bureau. Instead, as stated by the Commission, the experiments should be used to test an application-based selection process as the competitive bidding mechanism to award CAF Phase II support in price-cap service territories where the incumbent carrier declines model-based support.²

CenturyLink is actively engaged in identifying with greater specificity the areas, types of broadband service, and locations that will comprise its more formal proposals in the next stage of this process, with the specific details of the proposals likely varying depending on the outcome of the Commission's ongoing rulemaking proceeding to establish selection criteria. CenturyLink anticipates submitting proposals to deploy robust, fiber-based last-mile broadband service to a range of end-users, including residences, schools, libraries, healthcare facilities and other anchor institutions, in rural areas currently without broadband internet access providing speeds of at least 3 Mbps downstream and 768 kbps upstream.

Please contact the undersigned with any questions you may have regarding this letter.

Sincerely,

/s/ Jeffrey S. Lanning

² *Technology Transitions Order*, FCC 14-5, ¶ 102.