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VIA E-MAIL and ECFS

April 1, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, S.W.
Washington, DC 20554

RE: *Qwest Corporation Petition for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c)*, WC Docket No. 07-204
Petition of USTelecom for Forbearance from Enforcement of Certain Legacy Telecommunications Regulations Pursuant to 47 U.S.C. § 160(c), WC Docket Nos. 12-61, 07-204, 07-21

Dear Ms. Dortch:

Pursuant to the above proceedings,[1] CenturyLink provides its annual filing of the pole attachment cost data that was previously filed as part of ARMIS 43-01 for its legacy Qwest, Embarq and CenturyTel entities. The attached report provides the requisite pole and conduit rental calculation information.

Please contact me if you have any questions concerning this matter.

Sincerely,

/s/ John E. Benedict

Copy (via email) to: Julie Veach (julie.veach@fcc.gov)

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[1] *See Qwest Corporation Petition for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c)*, Memorandum Opinion and Order, 23 FCC Rcd 18483, 18490-91 ¶¶ 13-14 (2008); *Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain Legacy Telecommunications Regulations*, WC Docket No. 12-61, Memorandum Opinion and Order, 28 FCC Rcd 7627, 7646-54 ¶¶ 31-51 (2013), *pet. for rev. pending sub nom. Verizon v. FCC*, No. 13-1220 (D.C. Cir. filed July 15, 2013).

POLE AND CONDUIT CALCULATION INFORMATION
QWEST- 2013

Financial Information ($000)	AZ	CO	IA	ID*	MN	MT	ND	NE	NM	OR	SD	UT	WA	WY
Telecommunications Plant-in-Service	7,660,746	8,241,250	2,551,818	1,415,773	5,199,636	996,159	557,308	1,648,375	2,638,700	3,331,445	751,271	3,168,813	6,168,443	904,061
Gross Investment - Poles	59,134	31,813	12,736	6,745	27,680	7,219	2,107	802	18,266	39,409	3,688	15,522	53,640	7,620
Gross Investment - Conduit	656,624	525,554	134,385	69,809	276,058	33,078	22,076	76,692	168,589	330,284	36,205	237,946	553,697	46,386
Accumulated Depreciation - Total Plant-in-Service	6,106,026	6,628,680	2,130,778	1,209,731	4,281,325	885,480	501,687	1,340,787	2,234,481	2,797,598	673,740	2,587,180	5,496,099	808,723
Accumulated Depreciation - Poles	82,520	51,176	25,795	13,741	43,556	12,532	3,153	1,618	35,159	61,746	7,301	24,120	61,097	13,698
Accumulated Depreciation - Conduit	212,696	201,062	58,386	25,995	116,727	13,114	10,296	37,806	48,380	135,831	16,115	75,354	243,687	17,374
Depreciation Rate - Poles	7.70	7.20	8.00	12.00	5.50	10.80	3.70	11.70	11.80	9.30	12.20	9.30	7.60	7.70
Depreciation Rate - Conduit	2.50	2.60	2.20	2.60	2.30	2.70	2.30	2.20	2.80	2.50	2.40	2.50	2.80	3.00
Net Current Deferred Operating Income Taxes - Poles	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Current Deferred Operating Income Taxes - Conduit	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Current Deferred Operating Income Taxes - Total	(18,601)	(22,389)	(14,169)	(2,718)	(24,310)	(3,916)	3,914	(5,419)	(8,403)	(781)	(3,466)	(8,891)	(25,664)	(3,245)
Net Non-current Deferred Operating Income Taxes - Poles	(3,686)	(3,168)	(705)	0	(2,420)	(329)	0	(19)	(4,053)	(5,822)	(241)	(1,455)	(672)	(353)
Net Non-current Deferred Operating Income Taxes - Condui	21,002	16,824	1,197	0	7,431	227	0	340	5,197	13,795	249	7,391	5,441	284
Net Non-current Deferred Operating Income Taxes - Total	245,026	263,814	22,730	(6,186)	139,961	6,845	(8,319)	7,315	96,986	139,148	5,174	98,428	60,620	5,543
Pole Maintenance Expense	639	2,524	330	460	622	258	51	101	332	4,783	27	146	1,125	90
Pole Rental Expense	890	3,095	264	617	1,000	392	74	303	4,455	1,937	216	1,030	3,717	132
Pole Expense	1,529	5,619	594	1,077	1,622	650	125	404	4,787	6,720	243	1,176	4,842	222
Conduit Maintenance Expense	1,968	1,413	209	80	1,055	8	3	155	120	1,193	59	1,282	515	50
Conduit Rental Expense	0	0	24	0	8	0	0	0	1	0	0	0	1	0
Conduit Expense	1,968	1,413	233	80	1,063	8	3	155	121	1,193	59	1,282	516	50
General & Administrative Expense	98,394	97,080	36,810	18,712	69,133	12,585	6,729	17,846	35,744	46,187	8,434	39,705	78,173	10,918
Operating Taxes	65,104	181,003	79,202	37,459	80,356	27,998	10,799	31,310	63,190	59,035	8,034	57,201	81,888	21,920
Operational Data (Actual)														
Equivalent Number of Poles	124,964	104,334	84,107	39,998	117,091	30,073	10,468	8,084	51,017	91,929	16,187	72,522	164,597	20,523
Conduit System Trench Kilometers	14,218	10,813	3,992	1,975	7,449	1,368	600	2,945	4,408	7,690	1,283	6,895	12,384	1,537
Conduit System Duct Kilometers	40,121	34,458	14,872	5,825	26,829	2,953	1,864	9,537	12,046	19,721	3,459	16,427	32,515	3,794
Additional Rental Calculation Information	0	0	0	0	0	0	0	0	0	0	0	0	0	0

* Due to operational processing changes, the historical split of Idaho data between ID-North and ID-South are no longer readily identifiable and the requisite data for Idaho is now reported on a consolidated basis.

POLE AND CONDUIT CALCULATION INFORMATION
CENTURYTEL- 2013

	CNAN	CNAS	CNME	CNMS	CNMW	CNMC
	Century Tel of Alabama Northern Alabama	Century Tel of Alabama Southern Alabama	Century Tel of Missouri Belle Hermann	Century Tel of Missouri Southern Missouri Missouri	Century Tel of Missouri Southwest Missouri	Century Tel of Missouri Central Missouri
Financial Information ($000)						
Telecommunications Plant-in-Service	480,122	571,903	15,238	82,033	888,829	335,228
Gross Investment - Poles	14,176	12,783	437	894	10,825	5,084
Gross Investment - Conduit	1,393	5,518	170	210	7,269	6,588
Accumulated Depreciation - Total Plant-in-Service	428,574	484,943	11,403	66,309	701,464	255,571
Accumulated Depreciation - Poles	17,655	16,095	321	945	10,827	5,046
Accumulated Depreciation - Conduit	1,158	3,523	49	245	3,550	3,393
Depreciation Rate - Poles	5.70	6.80	20.00	20.00	20.00	20.00
Depreciation Rate - Conduit	2.00	2.30	2.30	2.30	2.30	2.30
Net Current Deferred Operating Income Taxes - Poles	0	0	0	0	0	0
Net Current Deferred Operating Income Taxes - Conduit	0	0	0	0	0	0
Net Current Deferred Operating Income Taxes - Total	0	0	0	0	0	0
Net Non-current Deferred Operating Income Taxes - Poles	(604)	(403)	16	(14)	0	7
Net Non-current Deferred Operating Income Taxes - Conduit	26	102	6	11	256	287
Net Non-current Deferred Operating Income Taxes - Total	8,947	10,579	529	4,227	31,316	14,605
Pole Maintenance Expense	474	368	3	24	368	110
Pole Rental Expense	4,914	2,333	17	84	1,721	230
Pole Expense	5,388	2,701	20	108	2,088	340
Conduit Maintenance Expense	5	1	0	7	49	2
Conduit Rental Expense	0	0	0	0	0	0
Conduit Expense	5	1	0	7	49	2
General & Administrative Expense	5,539	6,515	195	1,652	9,526	4,342
Operating Taxes	15,617	16,013	854	2,986	25,618	11,687
Operational Data (Actual)						
Equivalent Number of Poles	28,987	27,393	1,343	1,559	16,696	14,559
Conduit System Trench Kilometers	36	183	1	14	20	51
Conduit System Duct Kilometers	83	422	2	33	45	116
Additional Rental Calculation Information	0	0	0	0	0	0

POLE AND CONDUIT CALCULATION INFORMATION
EMBARQ - 2013

	UTNC	CEVA	UCFL	CENV	UTOH	UTPA	UTTN	UTVA
Financial Information ($000)	Carolina Tel & Tel - North Carolina	Central Tel Co. of Virginia	Embarq Florida Inc.	Central Tel Co Nevada Divn	United Tel Co of Ohio	United Tel of Pennsylvania	United SE Tennessee	United SE Virginia
Telecommunications Plant-in-Service	3,450,558	943,291	6,312,286	2,006,709	1,710,630	1,072,744	667,412	322,203
Gross Investment - Poles	27,817	23,041	15,294	7,063	57,963	91,828	39,240	21,351
Gross Investment - Conduit	37,611	10,247	114,974	152,934	31,920	10,363	17,876	2,915
Accumulated Depreciation - Total Plant-in-Service	2,736,538	747,469	5,000,018	1,794,401	1,741,252	933,162	596,175	300,614
Accumulated Depreciation - Poles	23,694	29,250	15,689	9,692	74,142	87,102	32,725	23,540
Accumulated Depreciation - Conduit	25,366	5,654	63,757	73,897	29,950	6,144	11,798	1,934
Depreciation Rate - Poles	4.30	6.70	2.80	6.80	6.30	3.80	5.00	6.20
Depreciation Rate - Conduit	2.10	1.60	2.30	2.90	2.40	2.20	2.50	2.10
Net Current Deferred Operating Income Taxes - Poles	0	0	0	0	0	0	0	0
Net Current Deferred Operating Income Taxes - Conduit	0	0	0	0	0	0	0	0
Net Current Deferred Operating Income Taxes - Total	0	0	0	0	0	0	0	0
Net Non-current Deferred Operating Income Taxes - Poles	770	(1,580)	(2,040)	(167)	0	434	668	0
Net Non-current Deferred Operating Income Taxes - Conduit	1,454	541	1,124	1,027	0	124	195	0
Net Non-current Deferred Operating Income Taxes - Total	133,351	49,844	278,002	13,478	(59,925)	12,824	7,299	(3,156)
Pole Maintenance Expense	918	621	1,068	403	946	513	56	110
Pole Rental Expense	4,810	2,498	6,749	132	2,273	3,282	5,153	3,537
Pole Expense	5,727	3,119	7,817	534	3,219	3,795	5,209	3,647
Conduit Maintenance Expense	321	5	227	447	67	112	9	6
Conduit Rental Expense	0	11	0	0	0	3	0	0
Conduit Expense	321	16	227	447	67	116	9	6
General & Administrative Expense	58,536	16,555	87,032	32,086	23,874	16,678	11,246	5,358
Operating Taxes	54,552	21,490	55,101	25,573	17,860	36,658	10,010	1,976
Operational Data (Actual)								
Equivalent Number of Poles	117,952	57,741	36,781	12,959	203,816	217,521	62,212	62,019
Conduit System Trench Kilometers	2,048	336	4,311	10,760	766	568	709	127
Conduit System Duct Kilometers	7,357	827	11,812	21,101	2,197	1,253	2,003	256
Additional Rental Calculation Information	0	0	0	0	0	0	0	0