



**John E. (Jeb) Benedict**

Suite 250  
1099 New York Avenue, N.W.  
Washington, DC 20001  
Phone 202-429-3114

Vice President – Federal Regulatory  
Affairs & Regulatory Counsel

***VIA ECFS***

May 1, 2014

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

Re: Policy and Rules Concerning the Interstate Interexchange Marketplace; Implementation of Section 254(g) of the Communications Act of 1934, as Amended, CC Docket No. 96-61

Dear Ms. Dortch:

On behalf of CenturyLink, Inc., attached is the 2014 certification of compliance with the Federal Communications Commission's geographic rate averaging and rate integration requirements pursuant to 47 C.F.R. § 64.1900. The certification covers the combined operations of all CenturyLink, Inc. subsidiaries, including Qwest Communications International Inc. (and its subsidiaries), which became a wholly owned subsidiary of CenturyLink, Inc. on April 1, 2011.

If you have any questions, please contact me.

Respectfully submitted,

/s/ John E. Benedict

Attachments

**CERTIFICATION OF COMPLIANCE WITH SECTION 64.1801 OF THE RULES OF  
THE FEDERAL COMMUNICATIONS COMMISSION – RATE INTEGRATION  
AND GEOGRAPHIC RATE AVERAGING RULES**

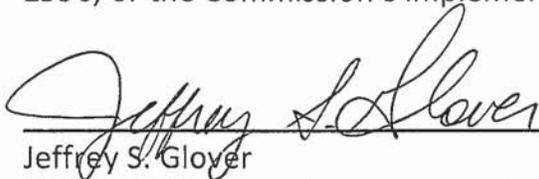
I, Jeffrey S. Glover, declare as follows:

I am the Vice President, Regulatory Operations, CenturyTel Service Group, LLC, a subsidiary of CenturyLink Inc., acting on behalf of CenturyTel Service Group, LLC, CenturyLink Operating Companies, CenturyLink Communications, LLC and Qwest Corporation d/b/a CenturyLink QC. I am authorized to execute this certification on behalf of all of these entities.

These Companies provide interstate interexchange telecommunications services that are subject to 47 U.S.C 254(g) and Section 64.1801 of the rules of the Federal Communications Commission. Following its acquisition of the Qwest companies in 2011, CenturyLink continues the ongoing process of integrating operations and policies, where appropriate, including within and among long distance affiliates.

I am familiar with the rules and regulations of the Federal Communications Commission concerning rate integration and rate averaging and with the interexchange telecommunications services of these companies.

Pursuant to Section 64.1900 of the Commission's rules, I hereby declare under penalty of perjury that, to the best of my knowledge, information, and belief, and apart from any immaterial issues previously disclosed or arising from ongoing merger-related adjustments and corrections, CenturyLink's interstate offerings subject to the certification requirements of Section 64.1900 do not violate the rate integration of rate averaging provisions of the Telecommunications Act of 1996, or the Commission's implementing rules.



Jeffrey S. Glover

Vice President, Regulatory Operations  
CenturyTel Service Group, LLC

Dated: April 30, 2014

## **Rate Integration**

### 2014 Annual Review

CenturyLink long distance companies provide long distance services to its retail customers in a ubiquitous manner. All CenturyLink companies which provide interstate interexchange services comply with the FCC's Rate Integration and Rate Averaging rules with the following exceptions:

#### **Exception No 1**

- ❖ CenturyLink's terminating access services are priced based on the identity of the terminating LATA and bands within those LATA based on cost, and are in compliance with the rate integration and rate averaging rules.

#### **Exception No 2**

- ❖ CenturyLink private line and advanced communications services are provided under contract and include the cost of Local Access Facilities which provide the physical connection between the customer's service address and CenturyLink's domestic network.

#### **Exception No 3**

- ❖ CenturyLink long distance services in New Mexico are not identical to other states due to conditions placed on it by the New Mexico Public Regulation Commission; the New Mexico PUC does not permit promotions on long distance that are provided in conjunction with CenturyLink local services.

#### **Exception No 4**

- ❖ CenturyLink has identified situations where some customers have different rates, or, the service is not ubiquitously offered across the Company's footprint. CenturyLink will be making the necessary programming changes after appropriate customer notifications have been completed. These interstate services include toll free for small business, and the application of the National Access Fee for business customers.