



adopt processes and practices to prevent rural call completion problems from occurring in the first place.”<sup>5</sup> The Commission adopted a safe harbor and waiver process to ensure that the regulatory burden does not act as a deterrent rather than encourage companies to adopt such practices.<sup>6</sup>

AT&T seeks a waiver of certain recordkeeping, recording and retention requirements in the *Order*. AT&T points out that it meets the criteria to be considered for obtaining a waiver. In particular, it satisfies the safe harbor, implements industry best practices and monitors its own performance on an ILEC-by-ILEC basis.<sup>7</sup> However, AT&T explains that the cost of making changes without the waiver would amount to approximately \$1 million and that the cost would increase substantially if its waiver request were denied.<sup>8</sup>

CenturyLink agrees that AT&T’s waiver request would further the goals of the *Rural Call Completion Order*. AT&T’s proposal to record and retain a statistically valid sample for the purpose of ensuring compliance with call completion mandates appropriately balances the interest of all participants in ensuring responsible call completion performance while limiting the cost burden associated with compliance. The approach will yield useful data while appropriately reducing the significant burden associated with adopting the safe harbor, thereby encouraging companies to adopt these industry best practices. CenturyLink also agrees that waivers are equally appropriate for intraLATA toll calls handed off to the terminating provider and calls that use MF signaling.

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<sup>5</sup> *Id.*, ¶ 97.

<sup>6</sup> *Id.*, ¶¶ 86-97.

<sup>7</sup> *Id.*, ¶ 96.

<sup>8</sup> AT&T Petition, p. 15.

CenturyLink believes that the Commission should grant waivers to other similarly situated carriers that make similar requests. In the event CenturyLink elects to implement the safe harbor options identified in the *Order*, it anticipates that it would seek a similar waiver in the near future.

### **III. CONCLUSION**

CenturyLink appreciates the opportunity to respond to the May 1, 2014, *Public Notice*. AT&T's Petition shows ample grounds for waiver, and CenturyLink supports AT&T's request.

Respectfully submitted,

CENTURYLINK

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