

**BEFORE THE  
NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Nebraska Public Service Commission, on its own motion, to investigate and monitor compliance with federally mandated intercarrier compensation reform.

Application No. C-4459/PI-185

**COMMENTS OF CENTURYLINK**

On April 17, 2012, the Nebraska Public Service Commission (Commission) issued its Order in Application No. C-4459/PI-185, in which it established a workshop to discuss intercarrier compensation reform requirements as mandated in the FCC's Order and FNPRM of November 18, 2011. In that Order, the FCC mandated a transition from the existing intercarrier compensation framework for intrastate and interstate telecommunications traffic to a bill and keep regime. The Commission also invited interested parties to submit written comments responsive to a number of issues that will be addressed at the workshop. Qwest Communications and United Telephone Company of the West d/b/a CenturyLink (collectively "CenturyLink") submit the following responses to the Commission's questions.

**(1) The manner in which the Commission should review tariff filings made pursuant to the new FCC rules;**

CenturyLink recommends that the Commission review these intrastate switched access tariff filings in a manner consistent with prior intrastate switched access tariff filings. There is no need to change a well-established process for these filings.

**(2) The timeframe for the Commission's review of the tariff changes.**

- (i.) Should the Commission require the switched access tariff filings made pursuant to the FCC's Report and Order to be filed prior to the normal (10) day filing requirement?**

CenturyLink recommends that the Commission maintain its normal tariff filing requirements for these compliance filings. The rate modification obligations associated with these filings have been very broadly communicated to all telecommunications providers, with impacted companies very cognizant of their filing obligations as well as aware of the associated rate changes.

CenturyLink has 37 state jurisdictions in which it must provide revised tariffs along with the supporting rate calculation detail. Due to the resulting unusually large number of filings that CenturyLink must make, resource constraints will prevent CenturyLink from filing this information earlier than the normal 10-day filing requirement. CenturyLink does intend to provide the Commission with its intrastate switched access tariff revisions and associated supporting documentation in the data templates as provided by the FCC. This will provide the Commission with the information it needs to thoroughly and accurately review the tariffs. CenturyLink is working diligently to meet the standard tariff filing obligations in all its operating states.

- (ii.) If so, when should the Commission require tariff amendments to be filed?**

See response to (2)(i.).

- (iii.) Should the Commission provide additional notice of the switched access tariff amendments filed? If so, how should the Commission provide notice of these tariff amendments?**

If the Commission maintains its normal tariff filing requirement, additional notice for this filing should not be required.

- (3) Whether supporting documentation should accompany the tariff changes, and if so, what should be filed?**

The FCC issued an Order on April 19, 2012, *In the Matter of Material to be Filed in Support of 2012 Annual Access Filings*, WCB/Pricing File No. 12-08, DA 12-575. In that Order, the FCC provided specific guidance for both price cap and rate-of-return carriers as to the information needed to be included in each carrier's tariff filing as a result of the new rules. Included in that Order was the spreadsheet template that the FCC requires ILECs to utilize to calculate the required rate reductions, and to provide back-up information needed to ensure compliance with the intrastate switched access reductions that are the subject of the review process by this Commission.

- (i.) If supporting documentation is needed should the documentation required differ based on whether the telecommunications company is an incumbent carrier or competitive carrier? Please explain.**

The price cap carrier template is also appropriate for CLEC submittals.

- (4) If the Commission determines that a telecommunications company's tariff changes are not consistent with the FCC rules, what process should the Commission use to ensure compliance with new FCC rules?**

If the Commission determines that there is an error in a company's intrastate switched access tariff filing or in its supporting documentation, it should allow the proposed tariffs to go into effect on July 1, 2012 under provisional authority, pending a subsequent analysis. Where required, the Commission may direct a company to provide a true-up with revised data and any necessary refile of resultant rates. If a true-up calculation is required subsequent to any company's initial filing, the Commission should limit the time period subject to true-up and also should specify a timely true-up filing date so as not to delay implementation of final rates.

**(5) Should the Commission use its enforcement tools for any telecommunications company failing to file the required switched access reductions? Should this be enforced by the FCC? Please explain.**

Should any ILEC or CLEC providing telecommunications services in Nebraska fail to file the mandated intrastate switched access tariffs, this Commission should exert its jurisdictional oversight to require compliance.

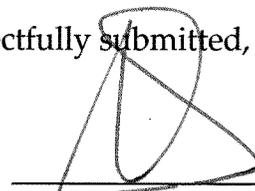
In summary, CenturyLink intends to follow the FCC's requirements in documenting its intrastate switched access tariff filing. That filing will include the information the Commission needs to accurately and thoroughly review CenturyLink's calculations and proposed rates. Some of that information will be publicly available; however, other information will require confidential treatment. Therefore, the Commission may wish to enter a protective order and nondisclosure agreement so that

parties can discuss any issues that may arise in a timely manner so as to prevent needless delay of the implementation of the intrastate switched access rate reductions.

Dated: May 8, 2012.

Respectfully submitted,

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