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March 9, 2012

**VIA ELECTRONIC FILING**

Betty McCauley  
Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

Re: In the Matter of the Commission's Investigation into Intrastate  
Carrier Access Reform Pursuant to S.B. 162  
PUCO Case No. 10-2387-TP-COI

Dear Ms. McCauley:

On behalf of the United Telephone Company of Ohio d/b/a CenturyLink and CenturyTel of Ohio, Inc. d/b/a CenturyLink (collectively "CenturyLink") please accept this letter in reply to the Small Local Exchange Carriers ("SLECs") letter dated March 2, 2012 in the above-referenced matter. The SLECs request that the Public Utilities Commission of Ohio ("PUCO") undertake "immediate action" on behalf of the SLECs – and only the SLECs – to "promptly place the ARP [Access Restructuring Plan] issue upon its docket for consideration and implement access reform for the SLECs...." Specifically, the SLECs seek that PUCO implement an alleged "small ARF," estimated at \$10 million by the SLECs.<sup>1</sup>

CenturyLink supports Senate Bill 162 and revenue-neutral recovery mechanisms to ensure Ohio consumers – all Ohio consumers – benefit from continued access reform. The goal of tempered PUCO action must ensure that all Ohio consumers benefit from harmonized state and federal activity. As addressed previously in CenturyLink's Additional Supplemental Comments and Additional Supplemental Reply Comments submitted in the above-referenced docket, CenturyLink endorses eventually moving forward, as may be appropriate, after the FCC has substantially reviewed all the issues regarding intercarrier compensation reform and, as may be appropriate, implement revenue-neutral recovery through an ARF as envisioned by Staff.

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<sup>1</sup> On March 2, 2012, a Motion for Extension of Time was filed in the above-referenced docket by a coalition referring to itself as the Small incumbent local exchange companies ("Small ILECs"). The Small ILEC coalition consists of 30 companies, as identified in footnote 1 of their Motion for Extension of Time. It appears that the 30 Small ILEC member companies are the same entities filing this letter, albeit four additional companies are included in the SLEC to which CenturyLink herein replies – namely, Ayersville Telephone Company, Chillicothe Telephone Company, Doylestown Telephone Company, and Nova Telephone Company.

Accordingly, the SLECs' proposal fails to present a holistic approach to continued access reform and should be rejected.

Copies have been served on all known parties as evidenced by the Certificate of Service. Please enter this document into the case file. If you have any questions, please feel free to contact Tom Dethlefs (303-992-5791) or me (717-245-6346).

Sincerely,

A handwritten signature in black ink, appearing to read "Sue Benedek", with a stylized, flowing script.

Sue Benedek

*Pro Hac Vice* Registration No. 1271-2011

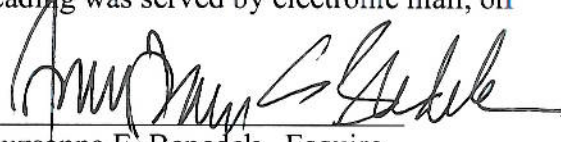
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enclosures

cc: All Parties on the Attached Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Pleading was served by electronic mail, on this 9<sup>th</sup> day of March 2012.



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Summary: Reply Letter Reply of CenturyLink to the SLEC's March 2, 2012 Letter electronically filed by Miss Jana Hurst on behalf of CenturyLink