



**CenturyLink™**

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March 16, 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 CenturyTel of Ohio, Inc. d/b/a CenturyLink and CenturyTel Solutions, LLC d/b/a CenturyLink Solutions (collectively "CenturyLink") please find attached for filing a Motion for Extension of Time and Memorandum of Support.

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 me at 717-245-6346 or Tom Dethlefs at 303-992-5791.

Sincerely,

Zsuzsanna E. Benedek

ZEB/jrh

enclosures

cc: All Parties on the Attached Certificate of Service (*via electronic mail*)

### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served by electronic mail, on this 16<sup>th</sup> day of March 2012.



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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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**CENTURYTEL OF OHIO, INC. D/B/A CENTURLINK AND  
CENTURYTEL SOLUTIONS, LLC D/B/A CENTURLINK  
MOTION FOR EXTENSION OF TIME**

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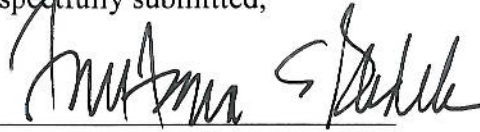
Pursuant to Ohio Adm. Code 4901-1-12 and 4901-1-13, CenturyTel of Ohio, Inc. d/b/a CenturyLink and CenturyTel Solutions, LLC d/b/a CenturyLink Solutions (collectively "CenturyLink") respectfully move for an extension of time in which to comply with the February 29, 2012 Entry of the Public Utilities Commission of Ohio ("PUCO") directing CenturyLink and all other affected ILECs and CLECs to file, by March 21, 2012 and April 4, 2012 respectively in the above-captioned docket, the appropriate application to amend intrastate access tariffs.

Due to on-going parallel federal proceedings that continue to shape regulatory requirements, and given the need to coordinate anticipated correlative state filings for an entity such as CenturyLink with an ILEC presence in 37 states (along with CLEC entities), CenturyLink respectfully requests an extension until April 11, 2012 to comply with PUCO's February 29, 2012 Entry. Centurylink also requests that it be permitted to file supporting calculations for its anticipated tariff filings rather than the final tariffs. The Commission should require the filing of CenturyLink's final tariffs by June 1, 2012 in accordance with the normal tariff filing rules.

This extension is being sought in good faith and without any intention to cause undue delay.

This Motion should be granted for good cause as set forth more fully in the accompanying memorandum in support.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Zsuzsanna E. Benedek', written over a horizontal line.

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*Pro Hac Vice* Registration No. 1271-2011 CenturyLink  
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Counsel for CenturyLink



**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	)	
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Access Reform Pursuant to Sub. S.B. 162	)	

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**MEMORANDUM IN SUPPORT**

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Ohio Adm. Code 4901-1-13(A) permits extensions of time to file pleadings and other papers upon a showing of good cause. An extension until April 11, 2012 for CenturyLink to file is warranted due to CenturyLink's need to coordinate on-going parallel federal proceedings that continue to shape regulatory requirements and to prepare anticipated correlative state filings eventually to be made in multiple states given CenturyLink's presence as an ILEC in 37 states, along with CLEC interests in many states. In addition, given the likelihood of intervening action by the FCC on pending petitions for reconsideration, CenturyLink should be permitted until April 11, 2012 to file supporting calculations for its anticipated tariff filings rather than the final tariff filings. The Commission should direct that the final tariffs be filed by June 1, 2012 in accordance with PUCO's normal tariff filing rules.

On November 18, 2011, the Federal Communications Commission ("FCC") released its *USF/ICC Transformation Order*.<sup>1</sup> Since that time, several parties have filed petitions for reconsideration that raise issues that will impact the intrastate switched access rate reductions called for in the *Order*. As a result, there is still significant uncertainty concerning the precise

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<sup>1</sup> Report and Order and Further Notice of Proposed Rulemaking, *In the Matter of Connect America Fund: A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, 2011 FCC LEXIS 4859 (Rel., November 18, 2011)(the "*USF/ICC Transformation Order*" or "*Order*").

adjustments that will be necessary to intrastate tariffs once the FCC rules on pending petitions for reconsideration of the *USF/ICC Transformation Order*.

For example, pending before the FCC is a request by the US Telecom Association (“USTA”) that the Commission reconsider and modify the *USF/ICC Transformation Order* to provide that demand usage information be determined based solely on annual billings for the fiscal year ending September, 2011. To calculate the adjustments that are necessary for specific intrastate rate elements, it is necessary to determine the historical demand for each of the affected rate elements. The *USF/ICC Transformation Order* presently provides that demand usage information is to include annual billings through September 2011 that are collected through March 31, 2012.<sup>2</sup> However, there are system limitations for CenturyLink and other carriers which prevent them from being able to allocate interstate switched access revenues between “billed” and “collected” revenue, from being able to allocate “collected” revenues between originating and terminating access, and from being able to allocate “collected” revenues between the specific elements impacted by the *USF/ICC Transformation Order*’s rate reductions. As a result, USTA and CenturyLink have asked the FCC to reconsider and modify the *USF/ICC Transformation Order* to provide for reductions based on Fiscal Year 2011 billings, rather than Fiscal Year 2011 billings and collections through March 31, 2012.

CenturyLink anticipates that the FCC will resolve the petitions for reconsideration on this issue and others in the near future to allow carriers to make the requisite filings in the states in advance of the July 1, 2012 effective date of the first intrastate access charge reductions. However, until the FCC rules on the pending petitions for reconsideration, it does not make sense for carriers to be required to prepare final tariff filings for review by the Commission. It is

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<sup>2</sup> *USF/ICC Transformation Order*, ¶879-880.

likely that the FCC's ruling on petitions for reconsideration will impact the rate adjustments that must be made to intrastate access tariffs. Accordingly, at this time, it makes sense for the Commission to require carriers to just file the supporting calculations for the intrastate access charge adjustments rather than the final filings themselves. To allow as much time as is possible for the FCC to rule on pending petitions for reconsideration, the Commission should direct that the final tariffs be filed on or before June 1, 2012 in accordance with the Commission's normal tariff filing rules.

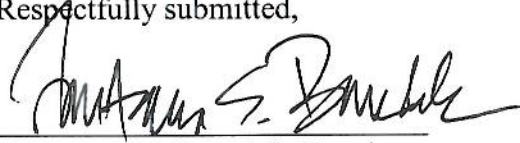
CenturyLink's requested extension until April 11, 2012 will better enable CenturyLink to prepare and coordinate with on-going parallel federal proceedings arising due to the FCC's *USF/ICC Transformation Order*. An extension until April 11, 2012, will also better enable CenturyLink to undertake anticipated correlative state filings due to the *USF/ICC Transformation Order*. Furthermore, an extension until April 11, 2012, will not disrupt these proceedings or cause any undue delay to Staff or any other party. CenturyLink anticipates that the filings it ultimately makes will be relatively simple to evaluate because most of CenturyLink's rate elements have already been reduced to interstate parity. However, the filings are nonetheless likely to be impacted by the FCC's rulings on petitions for reconsideration.

Finally, no prior extensions have been sought by CenturyLink. By Entry dated March 8, 2012, Attorney Examiner Jay S. Agranoff addressed a similar Motion for Extension requested by certain the Small ILECs ("SLECs"), granting the SLECs until April 11, 2012 to comply with PUCO's February 29, 2012 Entry.



For the foregoing reasons, CenturyLink requests that its Motion be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Zsuzsanna E. Benedek', written over a horizontal line.

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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/16/2012 12:49:26 PM**

**in**

**Case No(s). 10-2387-TP-COI**

Summary: Motion Motion for Extension of Time and Memorandum of Support of CenturyTel of Ohio d/b/a CenturyLink and CenturyTel Solutions, LLC d/b/a CenturyLink Solutions electronically filed by Miss Jana Hurst on behalf of CenturyLink