

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

RICHARD KEAVY,)	
)	
COMPLAINANT,)	SUMMONS
)	
vs.)	
)	CASE NO. QWE-T-21-14
QWEST CORPORATION D/B/A/ CENTURYLINK COMMUNICATIONS, LLC)	
)	
RESPONDENT.)	
)	

William Hendricks
Associate General Counsel
Lumen Technologies
902 Wasco St, Floor 1
Hood River, OR 87031
tre.hendricks@centurylink.com

THE STATE OF IDAHO SENDS GREETINGS TO THE ABOVE-NAMED RESPONDENT.

YOU ARE HEREBY NOTIFIED that a Complaint has been filed with the Idaho Public Utilities Commission by the above-named Complainant; and

YOU ARE HEREBY DIRECTED to file a written answer or written motion in defense of the Complaint within twenty-one (21) days of the service date of this Summons; the answer or motion in defense should also respond to the following areas of inquiry in addition to the allegations raised by the Complaint:

1. An explanation, to include documentation, of how Respondent’s Call Trace service operates. Additionally, please include a thorough description of what constitutes a “successful” and “unsuccessful” trace call.
2. A copy of Respondent’s contract with customers describing the Call Trace service.
3. An explanation, to include any documentation of Complainant’s attempts to utilize the Call Trace system.¹

¹ Complainant states that over time, he has made over 400 call trace contracts with Respondent.



Idaho Public Utilities Commission

P.O. Box 83720, Boise, ID 83720-0074

Brad Little, Governor

Eric Anderson, Commissioner

Kris Raper, Commissioner

January 12, 2022

Via Certified Mail

Qwest Corporation d/b/a CenturyLink Communications, LLC
ATTN: William Hendricks
Lumen Technologies
902 Wasco St, Floor 1
Hood River, OR 87031
tre.hendricks@centurylink.com

Re: Case No. QWE-T-21-14

Dear Mr. Hendricks,

Enclosed, please find a Summons and Formal Complaint (which includes the Formal Complaint and Additional Information filed by Richard Keavy ("the Complainant")) issued against CenturyLink in the above-mentioned case number. As directed in the Summons, you are to file a written answer or motion in defense of said Complaint with this Commission within 21 days of the service date of the Summons.

The Company should respond to Mr. Keavy's Formal Complaint and all claims made therein. Additionally, please provide any necessary information and documentation to the Commission. Further, the Company should specifically address the three points of inquiry as set forth in the Summons.

Sincerely,

Jan Noriyuki
Commission Secretary

Enclosure(s)

I:\Legal\TELECOM\QWE-T-21-14 Keavy\QWET2114_Summons_tb.doc

YOU ARE FURTHER NOTIFIED that unless you do so within the time herein specified, the Idaho Public Utilities Commission may take such action against you as is prayed for in the Complaint or as it deems appropriate under Title 61 of the *Idaho Code*.

YOU ARE FURTHER NOTIFIED that the Complainant and the Commission Staff shall have 14 days from the filing of Respondent's Answer to file any reply comments.

YOU ARE FURTHER NOTIFIED that all persons and parties shall comply with the Commission Rules of Procedure, IDAPA 31.01.01.000 et seq, and specifically Rules 41 through 43, IDAPA 31.01.01.041-.043.

WITNESS my hand and the seal of the Idaho Public Utilities Commission this 13th day of January 2022.



Jan Noriyuki
Commission Secretary

(SEAL)

FAXED
2083343762

10/18/21

Page 1 of 2

1 of 3

BROKEN

HAND CARRIED

10/20/21

4:48 PM

Personal and Confidential
Public Utilities Commission - General Manager

Part two (2) on the matter of the *57 'Call Trace' ruse... refusing to 'Initiate Deterrent Action'

The attached recent billing record from USWest/Century Link (CLink) shows I had 'traced' (via their *57 dishonesty) fifty seven (57) calls to my DoNotCall, unpublished, unlisted land line I have had with USWest for thirty-eight (38) years. CLink and others should be ashamed?

The CLink product includes use of the above words/promises that are part of hundreds of contracts CLink constructs when their customer hangs up on unwanted calls and dials *57. What follows are a series of CLink promises, instructions and directions that lead to contradictions, denials and flat out refusals of CLink to follow through and complete the contract objectives... including to 'Initiate' and to affect 'Deterrent Action.' More promises detailed at the time of each contract assures that after alerting CLink that three 'traces' (of the same number have been accounted to CLink (at 800-582-0655) they would return my call within 24 to 48 hours...with advice having to do with promised and expected 'deterrent action.' Not one of the five (5) call back assurances CLink said they would make to me, during the past several weeks, was returned or completed by CLink through today. This CLink abuse, form, format, neglect, indifference and dishonesty has been ongoing, consistent and unchanging, for more than five years. CLink has initiated, made and then broken hundreds of in force individual contracts with me (and countless others?) and defaulted on all of them?... given that CLink refuses to report, clarify or follow, in any form, as to what they accomplished, ignored, dismissed or just tossed.

Public Utilities Commission's (PUC) Chris Hecht (always polite and seemingly caring) was familiar with this history for years and responded to some of my calls for clarity; including my expectation of either action against CLink conduct or a statement of support for it and why. The last time the matter was laid out again for PUC action/enforcement Chris made it clear again that a superior colleague of his (a PUC lawyer?) made the decision to let the matter drop and do nothing, again, with no written opinion or detail as to why the negligent/harassing conduct must continue while being tacitly encouraged by CLink, the PUC and others.

The Boise Police Department (I spoke with a Captain and his Lieutenant...the latter, a cordial listener - for 90 minutes) recently concluded in writing it was not their (Boise City) preferred kind of policing and had refused (to my knowledge) to consider securing a subpoena for CLink records (on/as to reckless behavior) which I had outlined to/sought from Rick Niehlsen (Boise/BPD) three times over recent years. The Lt evidently concluded their prosecutors** need not be informed and added I would be heard from again! :) CLink, in the course of each of their contract producing episodes, posits that sometimes the police are needed to assure and uphold good order. BPD/Boise City by not referring the load of CLink negligence's to their respective prosecutors**...even though perhaps hundreds or thousands of intra/interstate citizens are indeed subject to similar assaults...may be suborning and encouraging the circular, play dumb, callous ridicule that IS CLink.

Multiple hundreds of individual *57 actions by me resulted in dozens of recommended (contract required) follow through phone calls to and from CLink. The rules require that after a number has been 'traced' at least three (3) times, the injured party must (according to contract rules) call CLink at 800-562-0655. The last five call back requests to that number (over 3 weeks) have not been returned in the 24-48 hours promised/contracted by CLink. Please engage/advise.

Richard Keavy 11282 Glen Ellyn Boise, ID 83713

Details of Your Internet and Home Phone Charges

(cont.)

Usage Charges

		By CenturyLink	
		Per	Line
		22	C
		721	C
		744	C
		661	C
		745	C
		1661	C
7	Sep 23 12:00am	3661	C
Total Calls			
Total Min.Sec			

Pay Per Use

This portion of your bill reflects calls served by Qwest Corporation DBA CenturyLink QIC

Call Trace (#57)

208-322-1

57 Activations at \$1.25 each ✓

\$ 71.25 ✓

No.	Date	Time	No.	Date	Time	No.	Date	Time
1.	Sep 10	6:07P	2.	Sep 12	4:28P	3.	Sep 13	9:46A
4.	Sep 13	9:47A	5.	Sep 13	9:49A	6.	Sep 13	12:01P
7.	Sep 13	12:23P	8.	Sep 14	9:16A	9.	Sep 14	2:11P
10.	Sep 14	6:14P	11.	Sep 14	9:11P	12.	Sep 15	8:34A
13.	Sep 16	2:36P	14.	Sep 17	10:44A	15.	Sep 17	12:56P
16.	Sep 17	3:31P	17.	Sep 18	9:48A	18.	Sep 18	9:51A
19.	Sep 18	11:43A	20.	Sep 18	1:11P	21.	Sep 18	2:34P
22.	Sep 20	9:57A	23.	Sep 20	10:39A	24.	Sep 20	2:50P
25.	Sep 20	2:57P	26.	Sep 21	10:38A	27.	Sep 21	10:39A
28.	Sep 21	10:39A	29.	Sep 21	10:40A	30.	Sep 22	8:58A
31.	Sep 22	9:57A	32.	Sep 22	12:25P	33.	Sep 22	2:46P
34.	Sep 23	7:49A	35.	Sep 24	10:47A	36.	Sep 24	12:39P
37.	Sep 24	4:16P	38.	Sep 27	9:04A	39.	Sep 27	10:40A
40.	Sep 27	12:16P	41.	Sep 27	2:43P	42.	Sep 28	8:02A
43.	Sep 29	9:54A	44.	Sep 29	10:07A	45.	Sep 29	11:32A
46.	Sep 29	11:51A	47.	Sep 29	5:27P	48.	Sep 30	9:55A
49.	Sep 30	9:57A	50.	Sep 30	9:58A	51.	Oct 01	2:58P
52.	Oct 04	9:44A	53.	Oct 04	3:31P	54.	Oct 04	3:32P
55.	Oct 04	3:36P	56.	Oct 05	12:10P	57.	Oct 07	11:04A

HAS BEEN "TRACED"
LEADING TO
"INITIATE
DETERRENT ACTION"

Usage Charges Total

s line
 at \$0.25 per line
 at 29.1%
 very Fee at \$1.00 per access line

CenturyLink is a registered trademark of CenturyLink Corporation

MT REPT

FAXED

2083373762

(NOP)

NO. 01

OTHER FACSIMILE

PUC

START TIME

Oct. 20 10:19AM

USAGE LINE

00'41

MODE

TX

Oct. 20 2021 10:19AM

PAGES 00

RESULT

NO RESPONSE

7:50 AM

RESULT : NO RESPONSE

- 1. POSSIBILITY OF REASON
- 2. RECEIVING FAX BUSY.
- 3. POWER FAILURE OR OTHERS.

RECEIVED

Mr Daniel Klein Hand Carry 12/22/21
Public Utilities Commission

DEC 22 PM 3:38
Page 1 of 5

PUBLIC UTILITIES
COMMISSION

Re: Formal Complaint by Richard Keavy involving USWest/CenturyLink.

Attached are several things that might be useful for those PUC people that carry on with the examination of the Century Link complaint.

1 - A copy of my Certified Mail letter addressed to Century Link Executive Offices in Omaha about a verbal and then written communication, a month ago, between their 'Mary' and me. I asked for a follow up, three weeks ago, and have not heard anything.

2 - Attached are four (4) pages of partial Century Link phone bills for the months of September, November and December. The pages show admissions from Century Link, after they said during each of their *57 recorded directives to the contracting party, that they had 'traced' not less than 113 calls (20, 56, 37) in total. A billing for the month of October is not available but there were more 'traces' during that month as well.

PUC examination will find that they admit (as did Mary) that they do not 'trace' calls even though they claim to do so and charged a fee for each trace.. as the billing notices show.

While many years of these trespasses and deceptions are of record they continue to be silent about the breaches, uncooperative and averse to making amends.

Please encourage those who look into this case to call on me if I can help to correct a misunderstanding or prevent time wasted by overlooked, misstated positions.

Thank you again,

Richard Keavy

PS: the pages are marked up to so expunge my in jeopardy/formerly 'protected' 'private' phone number and the numbers of other parties not known to be related to this case.

Personal and Confidential Certified Mail 70201810000129605277
President and/or Executive Secretary
Century Link Executive Offices
POBox 2618
Omaha, NE 68103

The following message was texted to the number given to me (531-213-4768) by Century Link's 'Mary' - in Omaha, NE. She called me on 11/23 to say "Doug" (of CLink in Boise) had asked her to contact me. She was unsure* why and was not current* on history or documentation.

" Hello Mary. You phoned on Tuesday eleven days ago. We spoke for 93 minutes. You were not moderately prepared or aware of Century Links careless, not attended abuse to my household going back many years...let alone what CenturyLink has DONE TO us throughout the last 90 days! Are you, 'Doug' or someone going to get back to me about reparations/remedies anytime soon? Please. Richard Keavy 12/4/21 (208) 322-1383 "

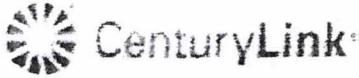
True to form, for Century Link/USWest, no reply* from 'Mary' through 12/13/21. It is routine for Century Link staff, when/if they do make contact, to recite data already known, data not relevant to their reprehensible conduct and data that does nothing to correct or address their well oiled, perennial, misconduct.*

Please do not continue to ignore this ongoing negligence.

Richard Keavy
11282 Glen Ellyn
Boise, ID 83713

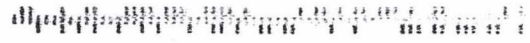
PS - I'm not including my USWest land line number provided to me thirty-eight (38) years ago. I paid a fee, every month, year after year, for multiple decades, to keep that line private and not published. It has been in the federal Do Not Call system since its start up. Some years ago USWest/ Century Link published that/my number in the local directory to serve whatever trendy profit making ruse of that time. I got calls from furniture sale companies, lawn companies and donut shops...welcoming me to the neighborhood! No apology from Century Link. No contrition* whatsoever. The only thing they did say was some clerk probably made a 'mistake' and then they promptly, dutifully changed the subject. The continual related abuse I get now, the double talk/dumb playing Century Link serves and accommodates, is about hubris* and of practiced dubious purposes. Also, if I display that phone number here, Century Link will likely claim all inappropriate distribution of it is/was my fault. There is only one of me, by name, in all of Idaho. 'Competent' Century Link staff will have no trouble finding the subject number.

PPS - Please reverse/remove the email addition see attached. There is no such reliable service.



PRE-SORTED
FIRST CLASS MAIL
U.S. POSTAGE
PAID
CENTURYLINK

USMC02-400136
RICHARD KEAVY
11282 W GLEN ELLYN DR
BOISE ID 83713-6023



Important information about your CenturyLink account.

Notice: Changes have been made to your CenturyLink® customer profile.

Our records show you recently updated your CenturyLink® customer profile, either by contacting a CenturyLink representative or through your online account profile at centurylink.com.

Contact E-mail Address*

* The e-mail address you provided for us to reach you

For CenturyLink account ending in ~~XXXX~~
Effective date: 12/02/21

At CenturyLink, we value the security of our customers' information and are sending this notice as a confirmation. As long as this change was made intentionally, no action is necessary. However, if you feel this change has been made in error, please contact us at ~~1-866-450-6152~~

1-866-450-6152 (Residential) or 1-800-803-8000 (Small Business)

To help us help you maintain the security of your account.

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→ No
USE USPS MAIL

Ⓢ You, CenturyLink, contact the appropriate party

12/7/21

Details of Your Internet and Home Phone Charges

Usage Charges

2019 Unlimited Usage

Some services and Calling plan are not displayed

Unlimited Plan Min Sec

11
160.00

Pay Per Use

The portion of your bill reflects calls served by Qwest Corporation (EBA CenturyLink Q2).

37

37 Activations at \$1.25 each

No.	Date	Time	No.	Date	Time	No.	Date	Time
	Nov 15	5:26P	8	Nov 17	7:16A	9	Nov 17	10:20A
		7:01P	7	Nov 18	9:27A	10	Nov 18	11:33A
		7:12P	11	Nov 18	1:39P	11	Nov 18	2:07P
		7:14P	12	Nov 18	1:43P	8	Nov 18	2:12P
		7:14P	13	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	14	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	15	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	16	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	17	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	18	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	19	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	20	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	21	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	22	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	23	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	24	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	25	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	26	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	27	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	28	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	29	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	30	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	31	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	32	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	33	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	34	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	35	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	36	Nov 18	1:43P	9	Nov 18	2:12P
		7:14P	37	Nov 18	1:43P	9	Nov 18	2:12P

37 TRACES

Usage Charges Total

Taxes, Fees & Surcharges

Local Phone Service

- Federal Excise at 0%
- State Fee at \$1.00 per month
- Federal Universal Service Fund at \$0.25 per line
- Federal Universal Ser. Fund at 0.081%
- Local Exchange

Long Distance Service

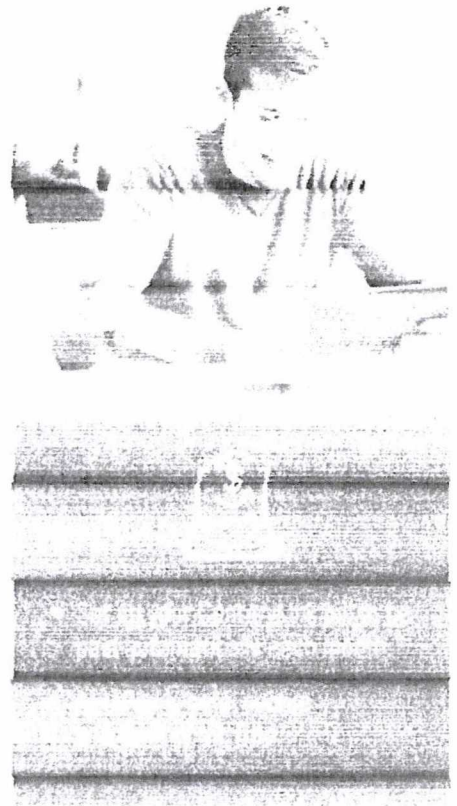
- Federal Universal Serv Fund at 29.1%

Taxes, Fees & Surcharges Total \$9.25

Total Internet and Home Phone Charges \$147.75

AutoPay

Set it and forget it.



Two easy ways to select AutoPay:

1. Log in to my.centurylink.com and select AutoPay.

2. Call 1-800-333-3333.

Details of Your Internet and Home Phone Charges

Usage Charges

Long Distance Usage

1. All long distance charges are subject to CenturyLink's standard rates. 2. Usage charges for international calling are not displayed.

11
160.00

Pay Per Use

This portion of your bill reflects calls served by Qwest Corporation - ERA CenturyLink QIC

Call Trace (37)

Day	Time	Rate	Day	Time	Rate	Day	Time	Rate
1	Nov 08	8:58A	3	Nov 10	4:55A	1	Nov 10	8:10A
4	Nov 11	3:07P	5	Nov 15	8:13A	6	Nov 15	8:45A
7	Nov 15	5:28P	8	Nov 17	7:18A	9	Nov 17	10:23A
10	Nov 17	5:21P	11	Nov 18	9:27A	12	Nov 18	9:26A
13	Nov 19	12:15P	14	Nov 18	1:19P	15	Nov 18	3:30P
16	Nov 19	10:16A	17	Nov 19	10:47A	18	Nov 19	12:19P
19	Nov 18	10:10P	20	Nov 18	5:12P	21	Nov 18	5:08P
22	Nov 22	7:23A	23	Nov 22	7:27A	24	Nov 22	7:54A
26	Nov 22	10:54P	28	Nov 23	1:41P	29	Nov 28	8:43A
28	Nov 30	11:00A	29	Dec 01	8:37A	30	Dec 01	1:00P
31	Dec 01	8:20A	32	Dec 02	11:08A	33	Dec 02	2:41P
34	Dec 03	3:10P	35	Dec 03	2:18P	36	Dec 03	5:17P
37	Dec 08	10:50A						

Usage Charges Total

546.75

Taxes, Fees & Surcharges

Local Phone Service

Federal Excise at 3%	1.95
Local Access Fee at \$1.00 per access line	1.00
Local Service Fee at \$1.00 per line	1.00
Local Service Fee at \$1.00 per line	1.00
Local Service Fee at \$1.00 per access line	1.00

Long Distance Service

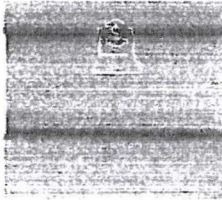
Federal Universal Service Fund at 3.7%	2.15
Taxes, Fees & Surcharges Total	52.25

Taxes, Fees & Surcharges Total

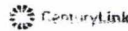
\$140.99

AutoPay

Set it and forget it.



www.centurylink.com
select AutoPay



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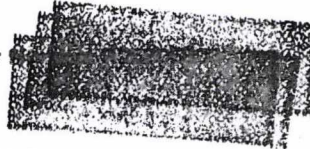
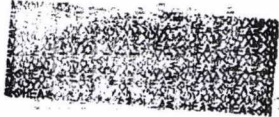
Details of Your Internet and Home Phone Charges

11/9/21
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AutoPay

Set it and forget it.

Internet and Phone Service - Oct 19, 2021 Order



Recovery Fee Previously Billed at - 2.26

Internet and Phone Service - Oct 26, 2021 Order Number G25779089

Add Service



Service Fee for New Line Charge Remains Billed at \$6.50 from Oct 26 to Nov 7 - 2.11

Charge for Internet and Voice Porting Fee - 2.15

Credit for Internet and Home Phone Fee - 2.15

999.50 from Oct 26 to Nov 7 - 999.50

Service Activation & Change Total - 999.95

Usage Charges

Long Distance Usage

This portion of your bill reflects calls served by CenturyLink Communications, LLC.

No.	Date	Time	Duration	Rate	Amount
1.	Oct 03	5:27P		00	22
2.	Oct 07	1:08P		00	2.11
3.	Oct 21	12:08P		00	2.11
4.	Oct 24	6:14P		00	2.11
Total Calls:					4
Total Min Sec:					37:00

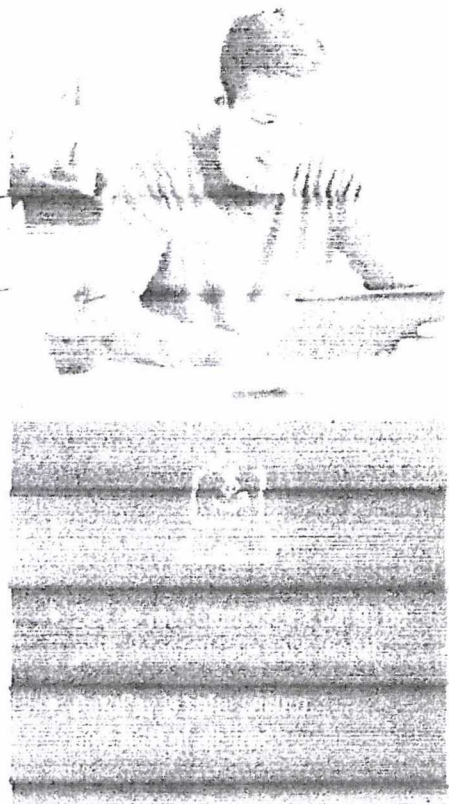
Pay Per Use

This portion of your bill reflects pay per use charges.

Cell Usage
56 Activations at \$1.25 each 70.00

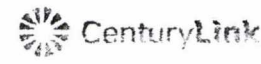
No.	Date	Time	No.	Date	Time	No.	Date	Time
1	Oct 05	7:52A	2	Oct 08	9:00A	3	Oct 11	11:18A
4	Oct 11	11:21A	5	Oct 12	9:37A	6	Oct 12	9:49A
7	Oct 12	9:51A	8	Oct 12	11:12A	9	Oct 12	11:25A
10	Oct 12	12:45P	11	Oct 12	12:45P	12	Oct 12	12:45P
13	Oct 14	10:15A	14	Oct 14	11:21P	15	Oct 14	11:21P
16	Oct 15	11:23A	17	Oct 15	12:41P	18	Oct 15	1:16P
19	Oct 15	1:45P	20	Oct 18	10:21A	21	Oct 19	12:45P
22	Oct 19	6:41P	23	Oct 20	6:14A	24	Oct 20	9:13A
25	Oct 20	11:40A	26	Oct 20	9:50A	27	Oct 22	10:26A
28	Oct 22	10:29A	29	Oct 22	4:31P	30	Oct 25	10:08A
31	Oct 25	2:51P	32	Oct 25	2:52P	33	Oct 26	9:49A
34	Oct 27	11:13P	35	Oct 28	9:23A	36	Oct 28	9:56A
37	Oct 28	9:37P	38	Oct 28	9:56A	39	Oct 28	9:56A
40	Oct 29	10:00A	41	Oct 30	10:00A	42	Oct 30	9:48P
43	Nov 01	3:11P	44	Nov 01	3:51P	45	Nov 02	8:23A

CONTINUES 56 "Traces"



Two easy ways to select AutoPay:

1. Log in to myCenturyLink.com and select AutoPay.
2. Call 1-800-333-3333 and select AutoPay.



CenturyLink may change, cancel or discontinue offers and services, or vary them by service area, without notice. See <http://www.centurylink.com/aboutus/legal> for the Electronic and Online Payment Terms and Conditions. © 2021 CenturyLink. All Rights Reserved. EPYPAT090

11/7/21
PAGE 5 of 6

Details of Your Internet and Home Phone Charges

(cont.)

No.	Date	Time	No.	Date	Time	No.	Date	Time
48	Nov 02	9:11P	47	Nov 02	10:50A	49	Nov 03	1:03P
49	Nov 03	10:44A	50	Nov 03	4:13P	51	Nov 03	1:03P
52	Nov 04	3:12P	53	Nov 06	2:10P	54	Nov 08	11:16A
55	Nov 08	11:36A	56	Nov 08	1:02P			
Usage Charges Total								\$79.57
Late Payment Charges								
Late Payment Charge - 3212 11								10.00
Internet Late Payment Charge ✓								17.00
Late Payment Charges Total								\$30.00
Taxes, Fees & Surcharges								
Local Phone Service								
Federal Excise at 3%								3.71
Local 911 at \$1.00 per access line								1.00
Toll-Free and Service Fees at \$0.25 per line								.25
Federal Universal Serv Fund at 29.1%								1.89
Facility Relocation Cost Recovery Fee at \$1.00 per access line								1.00
Long Distance Service								
Federal Universal Serv Fund at 29.1%								2.87
Federal Universal Service Fund								2.94
Property Tax Recovery								.17
Taxes, Fees & Surcharges Total								\$13.83
Total Internet and Home Phone Charges								\$203.39

DUPLICATE

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