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IDAHO PUBLIC
UTILITIES COMMISSION



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June 24, 2019

Diane Hanian, Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983
P.O. Box 305
Boise, ID 83450-0305

Re: Case No. GNR-T-19-01, CenturyLink 2018 Federal ETC Filings for:
Qwest Corporation d/b/a CenturyLink QC (Southern Idaho, SAC - 475103)
Qwest Corporation d/b/a CenturyLink QC (Northern Idaho, SAC - 475162)
CenturyTel of the Gem State, Inc. d/b/a CenturyLink (Idaho, SAC - 472223)
CenturyTel of Idaho, Inc. d/b/a CenturyLink (Idaho, SAC - 472225)

Dear Ms. Hanian:

On November 18, 2011 the Federal Communications Commission ("FCC") released its *USF/ICC Transformation Order* in WC Docket No. 10-90 et al. With that Order, the FCC began a transition to a national framework for certification of Eligible Telecommunications Carriers ("ETCs") and set forth a standard set of information that all ETCs must file with the FCC typically by July 1st of each year. The Order also required ETCs to provide the same information to the respective state commissions.

Annual ETC reporting requirements for recipients of federal high-cost support are contained in 47 C.F.R. § 54.313 of the FCC's rules. For the reporting of most of the data and certifications required by 47 C.F.R. §§ 54.313 and 54.422, the FCC has developed a reporting template, Form 481, to be utilized by ETCs.

Beginning with the filing due on July 1, 2018 the FCC Form 481 no longer requires that high-cost recipients file information regarding network outages; unfulfilled service requests; the number of complaints received by an ETC per 1,000 subscribers for voice and broadband services; and pricing for voice and broadband services. The FCC Form 481 also no longer includes certifications for high-cost recipients regarding service quality standards and consumer protection rules. Finally, the FCC centralized filing of the FCC Form 481; ETCs no longer file

duplicate copies of FCC Form 481 with the FCC and with states, U.S. Territories, and/or Tribal governments.

CenturyLink has completed its FCC Form 481 filings with USAC through their online "E-File" portal and those filings are now available to the Commission through the portal for the following companies:

- Qwest Corporation d/b/a CenturyLink QC (Southern Idaho, SAC - 475103)
- Qwest Corporation d/b/a CenturyLink QC (Northern Idaho, SAC - 475162)
- CenturyTel of the Gem State, Inc. d/b/a CenturyLink (Idaho, SAC - 472223)
- CenturyTel of Idaho, Inc. d/b/a CenturyLink (Idaho, SAC - 472225)

Additionally, CenturyLink has included in this filing the required Idaho specific affidavits for each of the four CenturyLink ETCs operating in Idaho.

Consistent with past years, please certify to the FCC pursuant to 47 C.F.R § 54.314 by no later than October 1, 2019 in order for CenturyLink to continue receiving Federal high cost support in Idaho for each of its four ETCs operating in Idaho.

Please contact me with any questions regarding this filing.

Sincerely,

/S/

Edward Lodge

Enclosures

Exhibit A

State of Louisiana)) ss
Parish of Ouachita)

**CERTIFICATION BY ELIGIBLE TELECOMMUNICATIONS CARRIER
OF COMPLIANCE WITH SERVICE QUALITY AND CUSTOMER
PROTECTION, ABILITY TO REMAIN FUNCTIONAL IN EMERGENCIES,
AND USE OF FEDERAL HIGH-COST SUPPORT.**

AFFIDAVIT OF QWEST CORPORATION D/B/A CENTURYLINK QC (NORTHERN IDAHO)

The Idaho Public Utilities Commission Order No. 29841 requires that Eligible Telecommunications Carriers (ETCs) certify that they are compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission must file an annual certification with the Universal Service Administrative Company and the Federal Communications Commission (FCC) that all federal high-cost support provided to ETCs within the State of Idaho will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Accordingly, the undersigned states and verifies under oath the following:

1. I am an officer of Qwest Corporation d/b/a CenturyLink QC (Northern Idaho), an eligible telecommunications carrier receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. Qwest Corporation d/b/a CenturyLink QC (Northern Idaho), is substantially complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.202(a)(2).
5. I also certify that all federal universal service support funds received by Qwest Corporation d/b/a CenturyLink QC (Northern Idaho) during the current calendar year will be used in a manner consistent with section 254(e); that is, for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The company will continue to comply for the period of January 1, 2020 through December 31, 2020, to be eligible for federal universal service fund support.
6. This verification and affidavit is provided to be the Idaho Public Utilities Commission to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.

FURTHER AFFIANT SAYETH NOT.

Jerry M. Allen
Jerry M. Allen, Vice President Customer Financial Services

Date 5/2/19

SUBSCRIBED AND SWORN to before me this 2nd day of April 2019.

Notary Public

My Commission Expires: with death

