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May 15, 2018

Ms. Amy Green
Secretary of the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Re: Docket No. 18-GIMT-448-GIT Adjustment of Switched Access Rates

Dear Ms. Amy Green:

United Telephone Company of Kansas d/b/a CenturyLink has enclosed for filing revisions to its Access Service Tariff with a proposed effective date of July 3, 2018. The following tariff revisions are included in this filing:

Section 6 Fifth Revised Page 148

This filing proposes the seventh step in implementing the Terminating Switched End Office Access Service reductions mandated in the Federal Communications Commission's November 18, 2011 Report and Order and Further Notice of Proposed Rulemaking in WC Docket Nos. 10-90, etc. (FCC 11-161) (Transformation Order). When a CenturyLink Price Cap ILEC owns the tandem and a CenturyLink Price Cap ILEC or affiliate owns the terminating End Office Switch, the tandem switched rates will be considered "Tandem-to-End Office" and will transition to bill-and-keep (not to exceed \$0.0000/MOU) as required by 47 C.F.R. §51.907(h), which addresses changes beginning July 1, 2018. All other tandem traffic that traverses a CenturyLink Price Cap ILEC-owned tandem and does not terminate to an end user served by a CenturyLink Price Cap ILEC end office will be considered "Tandem-to- 3rd Party" and will continue to be billed at the current Interstate rates, including tandem traffic traversing a CenturyLink Price-Cap ILEC-owned tandem to an affiliated CenturyLink CLEC end office. Tandem-Switched Transport charges associated with traffic traversing a non-CenturyLink Price Cap ILEC-owned tandem, but terminating to a CenturyLink-owned end office will also remain at current Interstate rates. It is also filed consistent with the Order Opening Docket; Requiring Tariff and Compliance Filings issued on April 26, 2018 under Docket No. 18-GIMT-448-GIT by the State Corporation Commission of the State of Kansas.

On April 5, 2018, the FCC released and order (WC Docket No. 18-100 DA 18-355) granting a limited waiver of the July 1 effective date for the 2018 annual access filings specifically including §51.907(h) and setting July 3, 2018 as the effective date for the 2018 rate changes required by its Transformation Order. The intrastate rate changes proposed under this filing are intended to mirror the effective date of the interstate rate changes.

Also enclosed is the CenturyLink certification certifying that CenturyLink is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism established by the Transformation Order. The Baseline and Eligible Recovery worksheet and certification will be filed on June 30, 2018.

If you have any questions regarding this filing, please feel free to call me at 913-353-7070.

Sincerely,



Christina L. Chushuk
Manager, Regulatory Operations

Attachments

cc: John Idoux

KS18-01A

CHRISTINA L. CHUSHUK
Manager, Regulatory Operations
chris.chushuk@CenturyLink.com
600 New Century Pkwy
New Century, KS 66031
Voice: (913) 353-7070

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.8 Rates and Charges (Cont'd)

6.8.2 Switched Transport (Cont'd)

(C) Tandem-Switched Transport

Rate Per Access Minute			
	<u>Originating</u>	<u>Terminating 3rd Party</u>	<u>Terminating End Office</u>
(1) Tandem-Switched Transmission			
(a) Facility (Per Mile)			
Zone 3	\$0.000025	\$0.000023	\$0.000000
Zone 4	\$0.000025	\$0.000025	\$0.000000
(b) Termination (Fixed)			
Zone 3	\$0.000278	\$0.000245	\$0.000000 (R)
Zone 4	\$0.000278	\$0.000278	\$0.000000 (R)
(2) Tandem Switching			
Zone 3	\$0.000425	\$0.000381	\$0.000000 (R)
Zone 4	\$0.000425	\$0.000425	\$0.000000 (R)
(3) Common Transport Multiplexing			
Zone 3	\$0.000277	\$0.000254	\$0.000000
Zone 4	\$0.000277	\$0.000277	\$0.000000
(4) Dedicated Trunk Port			<u>Monthly Rates</u>
(a) Per DS0			\$3.66
(b) Per DS1			\$93.40

CERTIFICATION

I am Vice President – Regulatory Compliance & Analytics for CenturyLink. I hereby certify that I have overall responsibility for supervision of the personnel who prepare all of the data supporting the CenturyLink Operating Companies– July 3, 2018 Annual Access Charge Tariff Filing bearing Tariff F.C.C. Nos. 1, 2, 3, 6, 7, 8, 9 and 11 for all issuing carriers and that I am authorized to execute this certification. Based upon the information provided to me by employees responsible for the preparation of, or for the supervision of the preparation of, the data submitted in support of the Tariff Review Plan information contained herewith, I hereby certify that the data has been examined and reviewed and is true, correct and complete to the best of my knowledge and belief.

Further, based upon the information provided to me by employees responsible for the preparation of, or for the supervision of the preparation of, the data submitted in support of the Eligible Recovery for Price Cap Carriers and Access Recovery Charge information contained herewith, I hereby certify that the data has been examined and reviewed and is true, correct and complete to the best of my knowledge and belief, that the CenturyLink Operating Companies are not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism, and that CenturyLink Operating Companies have complied with sections 51.915(d), 51.915(e), 51.915(f), 51.915(g) and 51.915(h) of the Commission's rules.

May 15, 2018



Jeff Glover
Vice President – Regulatory Compliance & Analytics

Contact Person: Gary Kepley
Director, Regulatory Compliance & Analytics
Telephone Number: (913) 353-7080