## **Description of Methodology**

The following narrative describes the methodology and supporting calculations utilized by CenturyLink to implement the Transitional Intrastate Access Service reductions required by 47 C.F.R. §51.907(c) which addresses changes beginning July 2013. CenturyLink's supporting calculations utilize the "ICC-Access Reduction" template released by the Federal Communications Commission ("FCC") on April 19, 2013, for calculating the July 2, 2013 intrastate access rate changes.

The FCC spreadsheet template also provides the methodology for calculating the rate changes and identifies in detail the intrastate access rates that are required to be changed consistent with the rules. Step 2 of the USF ICC Transformation Order brings Transitional Intrastate Access Services<sup>1</sup> rates and structure in parity with the functionally equivalent interstate rates and structure. This means that some intrastate rates may increase while other intrastate rates may decrease; some new intrastate rate elements, including originating, may be introduced to meet the interstate functionality equivalent access structure.

Section 51.907(c) of the FCC Rules continues with the same spreadsheet template as used to meet the 51.907(b) steps (which addressed changes beginning in July 2012) in calculating the rate for Transitional Intrastate Access Service that was effective July 3, 2012.

- 1. Compare functionally equivalent rate elements for Transitional Intrastate Access Services between intrastate and interstate.
- 2. Identify where structure differences will require establishing new intrastate rate
- 3. Where applicable, separate switched access elements into originating and terminating.
- 4. Set Transitional Intrastate Access Services rates equal to their functionally equivalent interstate rates.
- 5. Prepare intrastate and interstate tariff filing documents as required by each tariff jurisdiction.

<sup>&</sup>lt;sup>1</sup> Definition at 51.903 (j) Transitional Intrastate Access Service. A Transitional Intrastate Access Service means terminating End Office Access Service that was subject to intrastate access rates as of December 31, 2011; terminating Tandem-Switched Transport Access Service that was subject to intrastate access rates as of December 31, 2011; and originating and terminating Dedicated Transport Access Service that was subject to intrastate access rates as of December 31, 2011.