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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Agency Action to Establish a Temporary Certification Process in Compliance with 47 U.S.C. Section 254(e)	Docket No. 12-999-07 CENTURYLINK'S CERTIFICATION TO USE OF INTERSTATE ACCESS SUPPORT
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On July 31, 2012, the Public Service Commission of Utah (“Commission” or “PSC”) issued a Notice of Agency Action and Technical Conference in order to establish a temporary certification process in compliance with 47 U.S.C. Section 254(e) (the “Notice”). On August 10, 2012, Qwest Corporation d/b/a CenturyLink QC (hereinafter “CenturyLink”) filed its Entry of Appearance and Response as requested by the Notice. CenturyLink’s response notified the Commission that based on FCC rulings it is not required to file a Section 54.313 report in 2012, and there is nothing for the Commission to certify with respect to CenturyLink on or before October 1, 2012. This filing supplements the previous response with respect to the possible need for certification of the use of Interstate Access Support (“IAS”).

CenturyLink is aware of an issue that has arisen in other states regarding whether or not state commissions need to certify the use of IAS. It is uncertain whether state commission are required to certify the use of IAS, however, in the event Commission certification of IAS is needed in order for CenturyLink to continue to receive this support, it is attaching the affidavit of David D. Cole certifying the use of IAS (attached as Ex. A).

At the technical conference conducted in Docket 12-999-05 on July 19, 2012, it was discussed that parties would submit the information it files at the FCC as part of the state certification process. CenturyLink is not required to file any certification at the FCC with respect to IAS, and has not been required to file any IAS certification in the past with the PSC. In its ICC/USF Transformation Order, FCC 11-161, the FCC eliminated the requirement for ETCs to certify to the FCC regarding their use of IAS. To the extent that certification of state-designated ETC's use of IAS now falls to the states as part of their certifications, pursuant to new 47 C.F.R. § 54.314, regarding ETCs' use of high-cost support, it would seem that ETCs that only receive IAS support should not need to do more than provide a certification regarding their use of that support in the same manner as was previously provided to the FCC. In Utah, CenturyLink receives only IAS support. CenturyLink hereby certifies that all federal high-cost support received in Utah (specifically IAS) was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. This certification should be sufficient for enabling this Commission to certify that CenturyLink is entitled to high-cost support (specifically IAS) in Utah.

DATED this 15th day of August, 2012.

CENTURYLINK



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