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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Agency Action to Establish a Permanent Certification Process in Compliance with 47 U.S.C. Section 254(e)	Docket No. 12-999-09 CENTURYLINK'S ENTRY OF APPEARANCE AND COMMENTS
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On July 31, 2012, in Docket No. 12-999-07, 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). In Docket No. 12-999-07 the Commission indicated that it would open a separate docket to establish a more permanent process for addressing the certifications that are required by the Commission in 2013 and beyond. On September 11, 2012, the Commission issued a Notice of Agency Action to establish a permanent certification process in compliance with 47 U.S.C. Section 254(e) (the “Notice”). Qwest Corporation d/b/a CenturyLink QC (hereinafter “CenturyLink”) submits this Entry of Appearance and Comments as requested by the Notice.

Even though the FCC *Transformation Order* establishes a structure for ETC certification, the FCC will continue to rely upon states to help it determine whether universal support is being used for its intended purposes, including monitoring compliance with the new public interest obligations described in the *Transformation Order*. The reporting structure, as envisioned by

the FCC, includes and expands on existing requirements, thus creating a standard format for use by all. Attached hereto as Exhibit 1 is the report that CenturyLink proposes should be filed with the Commission on a going forward basis by carriers receiving federal high-cost and Connect American Fund (“CAF”) support (the “ETC Certification Report”). The attached ETC Certification Report satisfies the requirements of the *Transformation Order* and any Utah specific state ETC requirements.

CenturyLink recommends that the Commission utilize the attached ETC Certification Report since it is very similar to the information being provided at the federal level. Providing similar information at the federal and state level will ensure consistency with the requirements set forth by the FCC in the *Transformation Order*. The attached ETC Certification Report is essentially the same information in the same format that will be provided by carriers to the FCC and USAC pursuant to the *Transformation Order*. Further, using the attached ETC Certification Report is consistent with the format that is being presented to other states, thus ensuring a consistent baseline for reporting.

DATED this 5th day of October, 2012.

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