



CARLA M. BUTLER

March 24, 2017

Via Electronic Filing Only

Gary Widerburg
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111
psc@utah.gov

Re: Docket No. 17-049-03

Dear Mr. Widerburg:

Attached for filing please find CenturyLink's Petition to Modify Centurylink's Performance Assurance Plan Reports Filed With The Commission, along with a Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Carla".

Carla Butler
Lead Paralegal

Attachment
cc: Service List

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Attorney for CenturyLink

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of CenturyLink’s Petition for Modification to its Performance Assurance Plan Reports to the Commission	Docket No. 17-049-03 PETITION TO MODIFY CENTURYLINK’S PERFORMANCE ASSURANCE PLAN REPORTS FILED WITH THE COMMISSION
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Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”)¹ requests that the Public Service Commission of Utah (“Commission”) modify the requirements related to the Qwest Performance Assurance Plan (“PAP”) monthly reporting requirement. This proposal does not seek to change any obligations or reports, or the frequency of such reports, currently provided to Competitive Local Exchange Carriers (CLECs). Rather, CenturyLink requests that the existing monthly reporting requirement be modified such that CenturyLink is only required to file a report with the Commission in a month where it makes a PAP Tier 1 payment to a CLEC. Additionally, CenturyLink requests a modification of the requirement to identify, confidentially, the specific CLEC receiving a payment. Rather, CenturyLink proposes it only be required to provide a summary statement about the PAP Tier 1 payment, without disclosing the specific CLEC. CenturyLink requests these changes since there is little benefit, if any, gained by the Commission from a blank report, and this is outweighed by the burden on CenturyLink from

¹ Prior to April 1, 2011, Qwest Corporation did business as Qwest.

having to prepare such reports. To the extent there is a PAP Tier 1 payment to a CLEC, CenturyLink will continue to file a report that month, and provide the information in summary format so it can be publicly disclosed.

PAP BACKGROUND

The PAP is a self-effectuating performance assurance plan that is implemented as Exhibit K of interconnection agreements ("ICAs") between CenturyLink and CLECs that opt to include it in their ICAs.

The PAP contains terms and conditions, including performance indicator definitions, that were established as part of Qwest's effort, in the early 2000's, to obtain Federal Communications Commission ("FCC") approval, pursuant to 47 U.S.C. § 271, to enter into the interstate long distance telecommunications market.² Since Commission approval of the PAP, CenturyLink has filed monthly reports with the Commission providing information containing the Tier 1 payments made to CLECs. This report has contained CLEC specific information, and has been treated as a confidential report. This PAP report has been filed monthly, even when there have been no Tier 1 payments for the reported month.

REQUESTED COMMISSION REPORT MODIFICATIONS

CenturyLink respectfully requests that the Commission approve reasonable modifications to the PAP Tier 1 such that CenturyLink is not required to file a report in a month that there are no PAP Tier 1 payments, and when a report is made it can be done as a summary (rather than identifying specific CLECs), so it can be publicly filed.

When there is no Tier 1 payment made to a CLEC in a given month the Commission is


² The Commission approved the initial PAP for Qwest in its June 18, 2002 Order in Docket No. 00-049-08.

provided a blank report. A blank report provides little value to the Commission, but at the same time places a burden on CenturyLink for having to prepare and file such a report. For example during 2015 and 2016 there were PAP Tier 1 payments to CLECs in only 8 of the 24 months.³ This proposal will create efficiencies for the Commission and CenturyLink. The Commission will not waste time reviewing a report that provides no benefit, and CenturyLink is relieved of the burden to prepare a report that has no information.

Further, in the event there is a PAP Tier 1 payment, CenturyLink requests it only file a summary report, which provides the date of payment, performance indicators that were missed and the total amount of the payment, rather than disclosing the specific CLEC involved. This creates more public transparency. In the event the Commission or the Division of Public Utilities requests the identity of a CLEC that received a Tier 1 payment, that information could be provided confidentially. Exhibit A provides an example of the new summary report.

These above mentioned PAP Tier 1 reporting modifications are reasonable, and consistent with recent changes approved by the Idaho Public Utilities Commission.⁴

DATED this 24th day of March, 2017.



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³ In 2015 there were 2 months with a PAP Tier 1 payment to a CLEC and in 2016, there were 6 months with a PAP Tier 1 payment to a CLEC.

⁴ Idaho Public Utilities Commission, March 20, 2017 Order No. 33728 in Case No. PAP-T-14-01.
http://www.puc.idaho.gov/orders/recent/Final_Order_No_33728.pdf

UTAH PAP SUMMARY - DECEMBER 2016

EXHIBIT A
TO CENTURYLINK'S MARCH 24, 2017
PETITION IN DOCKET NO. 17-049-03

State	Reporting Period	PID	PID Description	Product	Current Month Payment	Incremental Rerun Payment	Interest	Total Monthly Payment
UT	12/01/2016	Total Payments			254	0	0	254
UT	12/01/2016	MR-7D	Repair Repeat Report Rate	UBL_ANAAGG	254	0	0	254

CERTIFICATE OF SERVICE
VIA EMAIL TRANSMISSION
Docket No. 16-049-03

I hereby certify that on the 24th day of March, 2017, I caused a true and correct copy of the foregoing PETITION TO MODIFY CENTURYLINK'S PERFORMANCE ASSURANCE PLAN REPORTS FILED WITH THE COMMISSION to be served upon the following persons via electronic mail at the e-mail addresses shown below.

Public Service Commission:

psc@utah.gov

Utah Division of Public Utilities:

Justin Jetter – jjetter@utah.gov

Bill Duncan – wduncan@utah.gov

Chris Parker - chrisparker@utah.gov

Casey Coleman - ccoleman@utah.gov

Erika Tedder – etedder@utah.gov

Office of Consumer Service:

Michele Beck – mbeck@utah.gov

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