



**CenturyLink®**

**Jason D. Topp**  
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March 26, 2014

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: In the Matter of Intercarrier Compensation Reform  
Required by FCC Order  
MPUC Docket No. P-999/PR-14-15**

Dear Dr. Haar:

Enclosed for filing are CenturyLink's Comments regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

**STATE OF MINNESOTA**  
**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger  
David Boyd  
Nancy Lange  
Dan Lipschultz  
Betsy Wergin

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

**Re: In the Matter of Intercarrier Compensation Reform  
Required by FCC Order  
MPUC Docket No. P-999/PR-14-15**

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA    )  
                              ) ss  
COUNTY OF HENNEPIN )

Dianne Barthel hereby certifies that on the 26th day of March, 2014, she e-filed a true and correct copy of CenturyLink’s Comments by posting it on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said document was also served via U.S. mail and e-mail as designated on the Official Service List on file with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel  
Dianne Barthel

Subscribed and sworn to before me  
this 26th day of March, 2014.

/s/ LeAnn M. Cammarata  
Notary Public

My Commission Expires Jan 31, 2015

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_14-15_14-15
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**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
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**In the Matter of Intercarrier Compensation      MPUC Docket No. P-999/PR-14-15  
Reform Required by FCC Order**

**CENTURYLINK'S COMMENTS**

CenturyLink submits this response to the Commission's Notice of Comment Period Regarding Procedures for Filing 2014 Access Rate Reductions dated March 12, 2014 in the above-referenced matter. CenturyLink appreciates the Department of Commerce's ("Department") proposed methodology in light of a confusing Federal Communications Commission ("FCC") Order. However, CenturyLink believes that the Department's calculation methodology conflicts with the methodology the FCC will require.

The FCC has indicated it plans to issue a clarification order detailing its required methodology by the end of March. CenturyLink urges the Commission to follow the FCC's process. In order to do so, the Commission could issue an order now requiring companies to follow FCC methodology. Alternatively, CenturyLink urges the Commission to delay a decision until after the FCC clarifies its required methodology. At that time, CenturyLink urges the Commission to order a Minnesota methodology that reflects the FCC's revised methodology.

Dated this 26<sup>th</sup> day of March, 2014.

**CENTURYLINK**

/s/ Jason D. Topp \_\_\_\_\_  
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