



Jason D. Topp
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April 17, 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 Supplemental Comments regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

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

CENTURYLINK'S SUPPLEMENTAL COMMENTS

On April 2, 2014 CenturyLink submitted comments in response to the Minnesota Public Utilities Commission's ("Commission") request for comments recommending procedures to be followed for the 2014 intrastate switched access charges. In an attachment to that filing, CenturyLink included a recent FCC order in which clarification of the rate transition process was provided. Further, CenturyLink requested that the Commission adopt the procedures set forth and clarified by the Federal Communications Commission ("FCC") in that order. The Department of Commerce ("Department") supported that recommendation.

Following issuance of the FCC's clarifying order, the Commission established a supplemental comment period that closes April 17, 2014. In addition to its earlier comments requesting adoption of the FCC methodology, CenturyLink respectfully requests that the Commission affirmatively adopt the competitive local exchange carrier ("CLEC") benchmarking practice established by the FCC. The FCC's rules require that a CLEC set its access rates no higher than the dominant ILEC in the state and in a subsequent order makes

clear that this benchmarking practice continue throughout the transition period. The rule states:

§ 61.26 Tariffing of competitive interstate switched exchange access services.

(c) The benchmark rate for a CLEC's switched exchange access services will be the rate charged for similar services by the competing ILEC. If an ILEC to which a CLEC benchmarks its rates, pursuant to this section, lowers the rate to which a CLEC benchmarks, the CLEC must revise its rates to the lower level within 15 days of the effective date of the lowered ILEC rate.

CenturyLink will not have final approval of its rates from the FCC and the State Commission until July 1, 2014. As a result, the FCC allows CLECs an additional 15 days in which to file their benchmarked rates.¹

CenturyLink respectfully requests that the Commission grant CLECs an additional 15 days, or until July 15, 2014, to file their intrastate switched access tariffs consistent with FCC directives.

Dated this 17th day of April, 2014.

CENTURYLINK

/s/ Jason D. Topp

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¹ *In the Matter of Connect America Fund, et al.*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, and WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, November 18, 2011 (USF-ICC Order), at 273, para. 807.