

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Staff's Review of the )  
Commission's Chapter 31 Rules )

**File No. TW-2017-0078**

**Comments of CenturyLink**

Comes now, CenturyLink<sup>1</sup> and submits the following comments regarding the future of the Missouri Universal Service Fund (USF) and response to questions proposed by Staff of the Missouri Public Service Commission (Commission).

**1. Should the \$6.50 support amount be revised?**

No. CenturyLink recommends that the Commission keep the existing \$6.50 support amount since full Federal Lifeline voice discounts will be available through 2019 and reduced Federal voice discounts will still be available during 2020 and 2021.

**2. Should the Missouri USF support a broadband-only service?**

No. However, as CenturyLink stated in its previous comments, including Broadband Internet Access Service (BIAS) as a Lifeline service may make sense, but changes to the Commission's Lifeline enabling statutes are likely needed in order to provide support for broadband-only service in Missouri.

**3. Should the Missouri USF provide some form of high-cost service?**

No. CenturyLink recommends no changes at this time.

**4. What should be the Missouri USF assessment level?**

CenturyLink recommends that the Commission suspend the current assessment percentage as soon as possible. Based on the Staff Memorandum dated February 27, 2017, Attachment D, page 1 of 7, shows that if the assessment stops today, the balance in the Lifeline wireline fund would continue to be supported until 2023.

**5. Should different assumptions be used to project Missouri USF revenues and expenses?**

No. CenturyLink recommends no changes at this time.

---

<sup>1</sup> "CenturyLink" includes CenturyTel of Missouri, LLC d/b/a CenturyLink; Spectra Communications Group, LLC d/b/a CenturyLink, Embarq Missouri, Inc. d/b/a CenturyLink and CenturyTel of Northwest Arkansas, LLC d/b/a CenturyLink.

**6. Are there any other issues relevant to maintaining the Missouri USF?**

CenturyLink is not aware of any relevant issues related to maintaining the current Missouri USF program that is in place today. However, CenturyLink urges the Commission to monitor FCC actions that could impact the state USF funding and disbursements.

**7. Should the Missouri USF be eliminated? If yes, how and when should it be done? What should be done with any unused funds?**

No. Missouri Statute, Section 392.248, created the state Universal Service Fund and it cannot be eliminated. As a result, CenturyLink recommends no changes at this time.

**8. Are there any other issues relevant to the future operations of the Missouri USF?**

CenturyLink is not aware of any relevant issues related to the future operations of the current Missouri USF program that is in place today. However, CenturyLink urges the Commission to monitor FCC actions that could impact the state USF operations.

Respectfully submitted,

*/s/ Becky Owenson Kilpatrick*

Becky Owenson Kilpatrick

Mo. Bar No. 42042

100 CenturyLink Drive

Monroe, LA 71203

Phone: (318) 340-5027

[Becky.kilpatrick@centurylink.com](mailto:Becky.kilpatrick@centurylink.com)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 28th day of April, 2017, a copy of the above and foregoing Comments of CenturyLink was served via email to each of the following:

Hampton Williams  
Office of the Public Counsel  
Missouri Public Service Commission  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, Missouri 65102  
opcservice@ded.mo.gov

Staff Counsel Department  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, Missouri 65102  
staffcounsel@psc.mo.gov

Cully Dale  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, Missouri 65102  
cully.dale@psc.mo.gov

Whitney Payne  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Whitney.payne@psc.mo.gov



Deanne Barthel