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May 1, 2015

Missouri Public Service Commission

Governor Office Building

200 Madison

P.O. Box 360

Jefferson City, MO 65102-0360

Dear Secretary:

Attached for electronic filing are revisions to the CenturyTel of Missouri, LLC. d/b/a CenturyLink, Facilities for Intrastate Access Tariff, P.S.C. MO. No. 2. These revisions are filed, in accordance with Missouri Public Service Commission Rules and Regulations and electronically submitted with a May 1, 2015 issue date and a proposed effective date of July 1, 2015.

This filing proposes to implement the process of reducing terminating switched end office rates by two-third of the differential between end office rates and $0.0007, as mandated in the Federal Communications Commission' November 18, 2011 Report and Order and Further Notice of Proposed Rulemaking in WC Docket Nos. 10-90, etc. (FCC 11-161) The calculations supporting these rate changes are being filed as Proprietary, with Certification, since they contain market specific information relating to services offered and will be filed separately with the Commission.

The list of tariff sheets reflecting a change are provided in Attachment A following.

A narrative describing the methodology and supporting calculations utilized by CenturyLink to implement the Terminating Switched End Office Access Service reductions is provided in Attachment B following.

Also enclosed is the CenturyLink certification certifying that CenturyLink is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism established by the Transformation Order.

Should you have questions or need additional information regarding this filing, please contact Richard Moore at (573) 634-0171 or Chris Chushuk at (913) 353-7070.

Sincerely,



Gary L. Kepley

Director – Regulatory Operations

Attachments

Pc: Gerry Flurer

Richard Moore

Office of Public Counsel (e-mail)

MO 15-05A

**Attachment A**

The following tariff sheets are being revised:

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| **Tariff** |  |  |
| 10th Revised Sheet 152 |  |  |
| 9th Revised Sheet 152.22nd Revised Sheet 3222nd Revised Sheet 328 |  |  |
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| **Attachment B** |  |  |
|  | **CenturyTel of Missouri, LLC d/b/a CenturyLink** |  |

**Description of Methodology**

**Description of Methodology**

The following narrative describes the methodology and supporting calculations utilized by CenturyLink to implement the process of reducing terminating switched end office rates by two-thirds of the differential between end office rates and $0.0007 as required by 47 C.F.R. §51.907(e) which addresses changes beginning July 2015. CenturyLink’s supporting calculations utilize the “Access Reduction Spreadsheet” template released by the Federal Communications Commission (“FCC”) on April 15,2015, for calculating the July 1, 2015 intrastate access rate changes.

 The FCC spreadsheet template also provides the methodology for calculating the rate changes and identifies in detail the interstate access rates that are required to be changed consistent with the rules. Step 4 of the USF ICC Transformation Order adjusts Interstate Terminating End Office Access rates down by two-thirds of the difference between the 2011 baseline composite rate and the target composite rate of $0.0007. The interstate rates will then be mirrored on the intrastate side so that rates will remain in parity.

Section 51.907(e) of the FCC Rules required the Access Reduction Spreadsheet to be modified to reflect rate reductions for July 1, 2015. For Price Cap carriers that file interstate tariffs assessing a single rate applicable in different states, the interstate demand used shall be the sum of the demand for all of the states included in the tariff, rather than making separate state-by-state calculations. For companies with a single rate in multiple states, the calculations are done at the regional level and the regional rates are mirrored in each study area[[1]](#footnote-1). For individual study areas, the calculations are done at the study area level. An overview of the methodologies necessary for reducing terminating end office access rates is as follows:

* 1. Establish the 2011 Baseline Composite Terminating End Office Access Rates, which reflects interstate rates and demand.
	2. Calculate the 2015 Target Composite Terminating End Office Access Rate by reducing the 2011 Baseline Composite Terminating End Office Access Rate by two-thirds of the difference between the 2011 Baseline Composite Terminating End Office Access Rate and $0.0007.
	3. Calculate the individual Interstate Terminating End Office Access rate levels so that the reduced rates and demand will equal to the 2015 Target Composite Terminating End Office Access Rate.
	4. Set Intrastate Terminating End Office Access rates equal to their functionally equivalent interstate rates.
	5. Prepare intrastate and interstate tariff filing documents as required by each tariff jurisdiction.
1. See footnote No. 27 in clarification order: Connect America Fund, et al., DA 14-434, WC Docket No. 10-90 et al. [↑](#footnote-ref-1)