

May 1, 2013

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 Spectra Communications Group, LLC d/b/a CenturyLink, Access Service 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, 2013 issue date and a proposed effective date of July 2, 2013.

This filing proposes to bring intrastate access service rates and structure in parity with the functionally equivalent interstate rates and structure, 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 Transitional Intrastate 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) 634-1560 or Chris Chushuk at (913) 345-7791.

Sincerely,

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Gary L. Kepley Director – Regulatory Operations

Attachments

Pc: Mark Harper Richard Moore Office of Public Counsel (e-mail)

MO 13-03A

## Attachment A

The following tariff pages are being revised:

## Tariff

1st Revised Sheet 150 8th Revised Sheet 151 1st Revised Sheet 151.1 7th Revised Sheet 152 5<sup>th</sup> Revised Sheet 152.1 5<sup>th</sup> Revised Sheet 152.2

## Spectra Communications Group LLC d/b/a CenturyLink

## **Description of Methodology**

The following narrative describes the methodology and supporting calculations utilized by CenturyLink to implement the Transitional Intrastate Access Service reductions required by 47 C.F.R. §51.907(c) which addresses changes beginning July 2013. CenturyLink's supporting calculations utilize the "ICC-Access Reduction" template released by the Federal Communications Commission ("FCC") on April 19, 2013, for calculating the July 2, 2013 intrastate access rate changes.

The FCC spreadsheet template also provides the methodology for calculating the rate changes and identifies in detail the intrastate access rates that are required to be changed consistent with the rules. Step 2 of the USF ICC Transformation Order brings Transitional Intrastate Access Services<sup>1</sup> rates and structure in parity with the functionally equivalent interstate rates and structure. This means that some intrastate rates may increase while other intrastate rates may decrease; some new intrastate rate elements, including originating, may be introduced to meet the interstate functionality equivalent access structure.

Section 51.907(c) of the FCC Rules continues with the same spreadsheet template as used to meet the 51.907(b) steps (which addressed changes beginning in July 2012) in calculating the rate for Transitional Intrastate Access Service that was effective July 3, 2012.

- 1. Compare functionally equivalent rate elements for Transitional Intrastate Access Services between intrastate and interstate.
- 2. Identify where structure differences will require establishing new intrastate rate elements.
- 3. Where applicable, separate switched access elements into originating and terminating.
- 4. Set Transitional Intrastate Access Services rates equal to their functionally equivalent interstate rates.
- 5. Prepare intrastate and interstate tariff filing documents as required by each tariff jurisdiction.

<sup>&</sup>lt;sup>1</sup> Definition at 51.903 (j) Transitional Intrastate Access Service. A Transitional Intrastate Access Service means terminating End Office Access Service that was subject to intrastate access rates as of December 31, 2011; terminating Tandem-Switched Transport Access Service that was subject to intrastate access rates as of December 31, 2011; and originating and terminating Dedicated Transport Access Service that was subject to intrastate access rates as of December 31, 2011.