



May 1, 2018

Morris Woodruff, Secretary
Missouri Public Service Commission
Governor Office Building
200 Madison
P.O. Box 360
Jefferson City, MO 65102-0360

Dear Secretary Woodruff,

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, 2018 issue date and a proposed effective date of July 3, 2018.

This filing proposes the seventh step in implementing the Terminating Switched End Office Access Service reductions mandated in the Federal Communications Commission's November 18, 2011 Report and Order and Further Notice of Proposed Rulemaking in WC Docket Nos. 10-90, etc. (FCC 11-161) (Transformation Order). When a CenturyLink Price Cap ILEC owns the tandem and a CenturyLink Price Cap ILEC or affiliate owns the terminating End Office Switch, the tandem switched rates will be considered "Tandem-to-End Office" and will transition to bill-and-keep (not to exceed \$0.0000/MOU) as required by 47 C.F.R. §51.907(h), which addresses changes beginning July 1, 2018. All other tandem traffic that traverses a CenturyLink Price Cap ILEC-owned tandem and does not terminate to an end user served by a CenturyLink Price Cap ILEC end office will be considered "Tandem-to-3rd Party" and will continue to be billed at the current Interstate rates, including tandem traffic traversing a CenturyLink Price-Cap ILEC-owned tandem to an affiliated CenturyLink CLEC end office. Tandem-Switched Transport charges associated with traffic traversing a non-CenturyLink Price Cap ILEC-owned tandem, but terminating to a CenturyLink-owned end office will also remain at current Interstate rates.

On April 5, 2018, the FCC released an order (WC Docket No. 18-100 DA 18-355) granting a limited waiver of the July 1 effective date for the 2018 annual access filings specifically including §51.907(h) and setting July 3, 2018 as the effective date for the 2018 rate changes required by its Transformation Order. The intrastate rate changes proposed under this filing are intended to mirror the effective date of the interstate rate changes.

The list of tariff sheets reflecting the proposed revisions are provided in Attachment A 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 me or Doug Galloway at (573) 634-1511.

Sincerely,

A handwritten signature in cursive script that reads "Christina L. Chushuk".

Christina Chushuk
Manager – Regulatory Compliance & Analytics

Attachments

Pc: Al Lubeck
Office of Public Counsel (e-mail)

CHRISTINA L. CHUSHUK
Chris.chushuk@CenturyLink.com
600 New Century Parkway
New Century, KS 66031
Voice: (913) 353-7070

MO18-03A

Attachment A

The following tariff sheets are being revised:

Tariff

11th Revised Sheet 151

3rd Revised Sheet 336

3rd Revised Sheet 337