



Jason D. Topp
Associate General Counsel - Regulatory
(651) 312-5364

June 23, 2016

Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

Re: CenturyLink 2016 Federal ETC Filing

Dear Ms. Van Gerpen:

On November 18, 2011, the Federal Communications Commission (“FCC”) released its *USF/ICC Transformation Order* in WC Docket No. 10-90, et al. With that Order, the FCC began a transition to a national framework for certification of Eligible Telecommunications Carriers (“ETCs”) and set forth a standard set of information that all ETCs must file with the FCC by July 1st of each year. The Order also required ETCs to provide the same information to the respective state commissions.

The annual ETC reporting requirements are contained in 47 C.F.R. § 54.313 of the FCC’s rules. The FCC has developed a reporting template, Form 481, to be utilized by ETCs to report the data and certifications required by 47 C.F.R. § 54.313 and § 54.422.

ETCs that accepted the Connect American Fund Phase II (“CAF II”) state-level commitment are required to report certain CAF II related information by July 1, 2016. Because the CAF II milestones are tracked at a total state level, for states where CenturyLink has multiple Study Areas, all CAF II related reporting will be found only on the Form 481 of the Study Area Code designated by USAC.

Enclosed is Form 481 for Qwest Corporation-South Dakota, as filed by CenturyLink with the FCC. The following information is confidential, and CenturyLink requests that this information be treated as confidential:

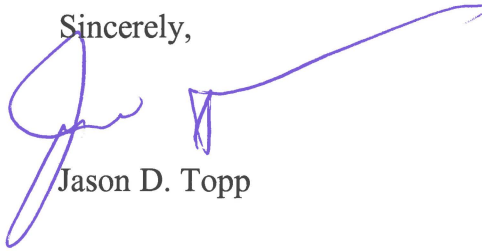
1. The outage information in response to § 54.313(a)(2).
2. The detailed broadband speed availability information at the exchange level provided in response to § 54.313(a)(7).
3. CAF Phase II capital expenditure information in response to § 54.313(e)(1).

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Consistent with past years, we request that you certify to the FCC pursuant to 47 C.F.R § 54.314 by October 1, 2016 in order for CenturyLink to continue receiving Federal high cost support in South Dakota.

Please do not hesitate to contact me should you have any questions regarding this filing.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason D. Topp", with a long horizontal flourish extending to the right.

Jason D. Topp

JDT/bardm

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of CenturyLink's 2016 Federal ETC Filing and Request for Confidential Treatment of Information was delivered via e-mail on this 23rd day of June, 2016, to the following parties:

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
patty.vangerpen@state.sd.us
(605) 773-3201 - voice
(866) 757-6031 – fax

Mr. Jason D. Topp
Associate General Counsel
Qwest Corporation dba CenturyLink
200 S. 5th St., Room 2200
Minneapolis, MN 55402
jason.topp@centurylink.com
(651) 312-5364 - voice
(612) 672-8911 – fax



Dianne Barthel

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

CenturyLink 2016 Federal ETC Filing

REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION

Pursuant to ARSD 20:10:01:41, Qwest Corporation d/b/a CenturyLink QC

(“CenturyLink”) requests confidential treatment of information as follows:

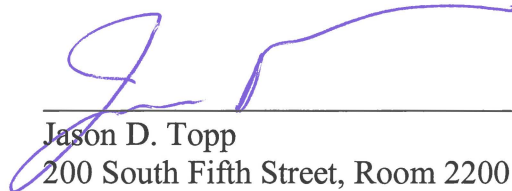
1. CenturyLink requests confidential protection and treatment of the outage information provided in response to 47 C.F.R. § 54.313 (a)(2) and (9), detailed broadband speed availability information at the exchange level provided in response to 47 C.F.R. § 54.313 (a)(7) and CAF Phase II capital expenditure information in response to 47 C.F.R. § 54.313(e)(1) attached to this application. The attachment is marked as “Confidential.”
2. The documents must be protected while in the possession of the Commission. When the Commission completes its review, all protected information must be returned to CenturyLink.
3. The person to be notified is Jason Topp, CenturyLink, 200 South Fifth Street, Room 2200, Minneapolis, MN 55402, telephone (651) 312-5364.
4. The claim for protection is based on ARSD 20:10:01:39 (4) and SDCL 37-29-1 (4).
5. The confidential documents contain outage information provided in response to 47 C.F.R. § 54.313 (a)(2) and (9), detailed broadband speed availability information at the exchange level provided in response to 47 C.F.R. § 54.313 (a)(7) and CAF Phase II capital

expenditure information in response to 47 C.F.R. § 54.313(e)(1), which is competitively sensitive. All of the confidential information being submitted is viewed as highly proprietary by CenturyLink and is closely guarded to maintain its confidentiality. The data at the level of detail being submitted by CenturyLink is closely guarded by all carriers offering access services, and if CenturyLink's confidential information became available to its competitors, they could use such data to target certain areas of CenturyLink's services and customers to their unfair competitive advantage.

6. The documents contain proprietary business information. Disclosure of these documents will provide actual and potential competitors with information which could provide them with a unique and unfair competitive advantage. Accordingly, CenturyLink respectfully requests that the Commission grant this request for confidential protection and treatment.

Dated this 22nd day of June, 2016.

QWEST CORPORATION d/b/a
CENTURYLINK QC



Jason D. Topp
200 South Fifth Street, Room 2200
Minneapolis, MN 55402
(651) 312-5364
Jason.topp@centurylink.com