



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

June 15, 2017

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

Re: CenturyLink 2017 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; however, for 2017, this date has been extended to July 3rd. 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. For the reporting of the data and certifications required by 47 C.F.R. § 54.313 and 54.422, the FCC has developed a reporting template, Form 481, to be utilized by ETCs.

Included in the Form 481 information and for administrative ease in reporting Connect America Fund Phase 1 Incremental Support Program Round 2 information, USAC requested a cumulative filing depicting the full program enablement to be reported in year three.

CenturyLink uploaded its 2015 and 2016 Connect America Fund Phase II location information to the new Universal Service Administrative Company (“USAC”) High Cost Universal Broadband (“HUBB”) reporting portal. USAC is also developing this portal to allow reports to be generated by State Commissions and any interested party. USAC has not identified when that capability will be available, but is working to have it available prior to this year’s October 1 ETC certification filing deadline.

200 South 5th Street, Room 2200
Minneapolis, MN 55402

www.centurylink.com

Patricia Van Gerpen, Executive Director

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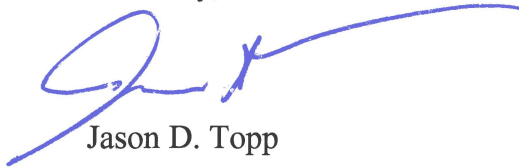
June 15, 2017

Enclosed is Form 481 for Qwest Corporation-South Dakota d/b/a CenturyLink QC, as filed by CenturyLink with the FCC on or before July 3. The detailed broadband speed availability information at the exchange level provided in response to 54.313(a)(7), and the CAF II capital expenditures in response to 47 C.F.R. 54.313 (e)(1)(B) are confidential. CenturyLink requests that this information be treated as Confidential, and enclosed is a Request for Confidential Treatment of Information.

Consistent with past years, CenturyLink requests that the Commission certify to the FCC pursuant to 47 C.F.R § 54.314 by October 1, 2017 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,



Jason D. Topp

JDT/bardm

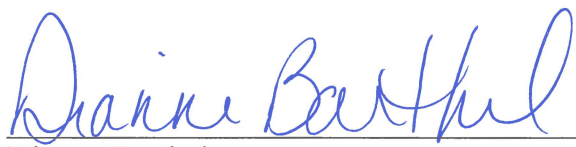
Enclosures

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of CenturyLink's 2017 Federal ETC Filing and Request for Confidential Treatment of Information was delivered via e-mail on this 15th day of June, 2017, 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

Mr. Jason D. Topp
Senior Counsel
Qwest Corporation dba CenturyLink
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Dianne Barthel

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

CenturyLink 2017 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:

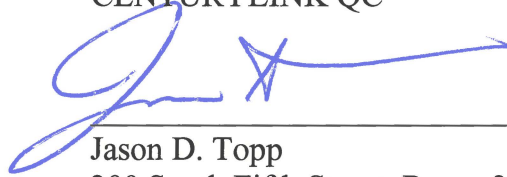
1. CenturyLink requests confidential protection and treatment of the detailed broadband speed availability information at the exchange level provided in response to 47 C.F.R. § 54.313 (a)(7) and CAF Phase II capital expenditure information in response to 47 C.F.R. § 54.313(e)(1) attached to this application. The attachment is marked as “Confidential.”
2. The documents must be protected while in the possession of the Commission.
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 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 15th day of June, 2017.

QWEST CORPORATION d/b/a
CENTURYLINK QC



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