

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

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**IN THE MATTER OF STUDY AREA )  
BOUNDARIES FOR INCUMBENT )  
LOCAL EXCHANGE CARRIERS )**

**DOCKET NO. TC13-026**

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**CENTURYLINK'S ACTION PLAN ON FCC'S  
STUDY AREA BOUNDARY ORDER**

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**Background**

On November 6, 2012, the FCC released a Report and Order adopting data specifications for collecting study area boundaries for purposes of creating a complete, publicly-available nationwide set of study area boundaries, which would be used to implement universal service reforms adopted as part of the USF/ICC Transformation Order. Specifically, the FCC required ILECs to submit certified study area boundary data in esri shapefile format, and establish a procedure for resolving overlaps and voids in submitted data.

On February 26, 2013, the FCC released an Order on Reconsideration modifying several aspects of the rules adopted in the November 6, 2012 Report and Order. The FCC concluded that it is more appropriate for state commissions to certify to the accuracy of the boundary data when they submit the data on behalf of ILECs operating in their states. Also, the FCC permits ILECs that are price cap carriers to submit exchange-level study area boundary data by providing internal wire center boundaries, if they choose, and indicating the exchange(s) associated with the wire center. And, the FCC provided some guidance as to

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expectations regarding the certification requirement and clarified the accuracy standards laid out in the prior Order.

On February 27, 2013, a Petition for Reconsideration was filed with the FCC. The Petition requested reconsideration of several items much along the lines of the OMB comments. We understand the FCC is open to making additional changes in the requirements and that some companies will continue to push for reducing the exchange boundary requirements for price cap companies to provide only study area (perimeter) boundaries.

**CenturyLink's Position after the FCC's Order on Reconsideration**

In preparation for the FCC's boundary data request, CenturyLink has begun to assemble files and is in the process of validating our exchange boundary data with engineering records.

Due to the Order on Reconsideration, the state commissions have the initial option to take the lead in assembling and certifying the data. CenturyLink supports the state of South Dakota taking on this role. CenturyLink stands ready and willing to assist in that effort.

Dated: April 3, 2013.

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