

June 25, 2014

Patricia Van Gerpen
Executive Director
Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, SD 57501-5070

Re: CenturyLink 2014 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.

In addition, ETCs with voice service rates that are below the rate floor as specified by the FCC¹ must file the voice rate information required by 47 C.F.R. § 54.313(h) by July 1.

Enclosed are Form 481 and the voice rate information for Qwest Corporation-South Dakota, as filed by CenturyLink with the FCC. The access line data provided in response to 47 C.F.R. § 54.313(h) is confidential. In addition, the following information with Form 481 is confidential:

1. The outage information and certain Tribal engagement information that is customer or company proprietary information provided in response to § 54.313(a)(2) and (9).

¹ Only ETCs that receive Federal High Cost Loop or High Cost Model Support are required to report residential basic rates below the rate floor.

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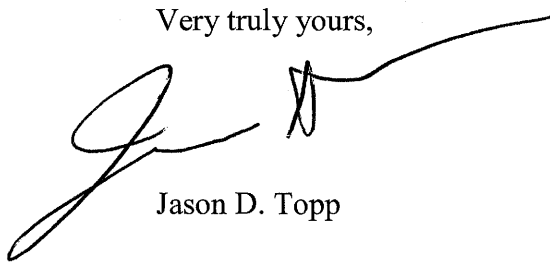
2. The detailed broadband speed availability information at the exchange level provided in response to § 54.313(a)(7).

CenturyLink requests this information be treated as such as provided by ARSD 20:10:01:41 and ARSD 20:10:01:39 (4). Also enclosed is a Request for Confidential Treatment of Information.

Consistent with past years, CenturyLink requests that you provide the required certification to the FCC pursuant to 47 C.F.R § 54.314 by October 1, 2014 in order for the Company to continue receipt of its Federal high cost support in South Dakota.

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

Very truly yours,

A handwritten signature in black 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 on this 25th day of June, 2014, the 2014 Federal ETC Filing and Request for Confidential Treatment of Information was E-Filed upon the following party:

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
patty.vangerpen@state.sd.us

and copies sent electronically or via U.S. mail, addressed to the following:



Dianne Barthel

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

CenturyLink 2014 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 access line data provided in response to 47 C.F.R. §54.313(h), outage and Tribal engagement information provided in response to 47 C.F.R. §54.313 (a)(2) and (9), and detailed broadband speed availability information at the exchange level provided in response to 47 C.F.R. §54.313 (a)(7) attached to this application. The attachment is marked as “Confidential.”
2. The document 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 document contains access line data provided in response to 47 C.F.R. §54.313(h), outage and Tribal engagement information provided in response to 47 C.F.R. §54.313 (a)(2) and (9), and detailed broadband speed availability information at the

exchange level provided in response to 47 C.F.R. §54.313 (a)(7), 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 document contains proprietary business information. Disclosure of this document 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 25th day of June, 2014.

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