

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of an Investigation Examining)
Call Routing and Call Completion Problems) Case No. TW-2012-0112
In the State of Missouri)

CENTURYLINK'S POST-WORKSHOP COMMENTS

CenturyLink¹ appreciates the opportunity to provide comments regarding the Commission's investigation into long distance call routing and termination issues that were discussed at the November 7, 2011 Workshop, and the opportunity to participate in the Workshop as well. CenturyLink is committed to providing quality service to its customers and has every incentive to ensure that its long distance calls are routed and completed appropriately. On this basis, CenturyLink intends to participate actively in this docket and to work with the Commission and the industry to find workable solutions to the problems that have been raised regarding call routing and call completion in Missouri.

As noted by the Rural Carriers in their Petitions that led the Commission to open this investigation, the issues raised in this docket are nationwide in scope and are being considered and addressed at both the national level and in many states.² It is important for these issues to be considered and addressed consistently and comprehensively in these various forums, since any problems and any proposed solutions will likely affect interexchange traffic in both the interstate and intrastate jurisdictions.

¹ "CenturyLink" as used in these comments refers collectively to CenturyTel of Missouri, LLC d/b/a CenturyLink, Spectra Communications Group, LLC, d/b/a CenturyLink, Embarq Missouri, Inc. d/b/a CenturyLink, CenturyTel of Northwest Arkansas, LLC d/b/a CenturyLink, Embarq Communications, Inc., d/b/a CenturyLink Communications, CenturyTel Long Distance, LLC d/b/a CenturyLink Long Distance, and Qwest Communications Company, LLC d/b/a CenturyLink QCC.

² See, e.g., the FCC's Rural Call Completion Task Force and the Nebraska and Oregon proceedings noted in the Rural Carriers' Petitions as well as the Background section of the Workshop Notice.

Based on the Missouri laws and regulations identified by the Commission's legal counsel at the Workshop, it appears that Missouri already has in place the necessary laws and regulations to address call routing and completion issues.³ Therefore, the Missouri Commission should focus its efforts on identifying the root causes of the problems and on developing appropriate and workable mechanisms for resolving the problems based on the identified causes.

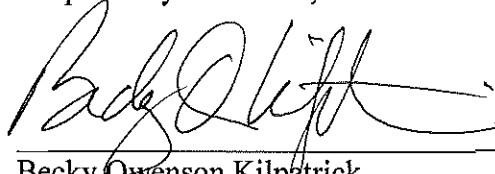
CenturyLink believes that the issues under discussions are best addressed through industry cooperation and the development of appropriate technical standards and "best practices." CenturyLink, therefore, urges the Commission to quickly move forward on the suggestions made at the workshop for technical meetings and collaboration among the industry to develop such "best practices" and other suggestions to address the call completion problems identified in the meetings.⁴ As CenturyLink noted at the workshop, efforts to develop industry standards related to call routing and call completion are already underway through the national telecommunications standard setting body, ATIS.⁵ CenturyLink intends to fully participate in these efforts, as well as to continue its participation in other forums, particularly the federal efforts to address these problems on a nationwide basis. CenturyLink encourages Missouri staff to also participate in the federal proceedings and to familiarize themselves with the proceedings in other states, so that staff can both contribute to and learn from these efforts. Such collaboration will help, in moving toward solutions that can address the issues, in ways that are workable locally, regionally, and nationally.

³ See, staff's written presentation "Call Gapping Telecommunications Workshop, Staff Counsel's Legal Analysis," prepared by Cully Dale, November 7, 2011.

⁴ For instance, Dave Lewis, representing ANPI at the workshop, suggested that the industry be given 60 days to work together to develop a consensus regarding "best practices" that will provide solutions to the call routing and call completion issues identified by the rural carriers in their petitions and at the workshop. In addition, staff suggested holding a technical conference to discuss the technical issues that contribute to call routing and call completion problems and how these issues can be addressed.

⁵ As CenturyLink's representative, Mary Retka, noted at the workshop, ATIS sent a request to rural carriers on November 4, 2011 to participate in a call to discuss these issues scheduled for December 8, 2011.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Becky Owens', written over a horizontal line.

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On Behalf of CenturyLink