

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

In the Matter of a Working Case to Address)	
Security Practices for Protecting Essential)	Case No. AW-2015-0206
Utility Infrastructure)	

RESPONSE OF CENTURYLINK

CenturyTel of Missouri, LLC d/b/a CenturyLink, Embarq Missouri, Inc. d/b/a CenturyLink, Spectra Communications Group, LLC d/b/a CenturyLink and CenturyTel of Northwest Arkansas, LLC d/b/a CenturyLink (together referred to as “CenturyLink”) file this Response to the Missouri Public Service Commission (“Commission”) Staff’s June 8, 2015 Request for Commission Order and July 17, 2015 Amended Request.

CenturyLink in Missouri is comprised of four “incumbent local exchange telecommunications companies” (“ILECs”) as defined by §386.020(22) RSMo. Cum. Supp. 2013. CenturyLink also has affiliates certificated as an interexchange company (“IXC”), a competitive local exchange company (“CLEC”), and a video service provider. CenturyLink also provides broadband internet access (“DSL”) and cloud computing services. As such, its international communications network is interwoven between regulated and unregulated services and any plan for cybersecurity is intricately entwined between these services.

Staff’s Amended Request for Commission Order follows the March 23, 2015 workshop on potential cybersecurity and physical infrastructure security issues and states that “a consensus was reached that a set of questions should be sent to all utilities, asking about those [security practices] matters.” (Amended Request p. 1) However, to CenturyLink’s knowledge, no representatives of the telecommunications industry were present at this meeting to provide their input or “consensus”, since prior dockets had focused on Missouri’s regulated electric, natural

gas, sewer, and water utilities. Thus, there was no “consensus” by the industry and in fact, a representative of the Missouri Telecommunications Industry Association indicated just the opposite – that telecommunications providers should not be included in this proceeding.

CenturyLink believes that it is unnecessary for this Commission to involve it in the cybersecurity docket as these efforts are duplicative of what the Federal Communications Commission (FCC) Public Safety and Homeland Security Bureau is reviewing in the pending docket open on cybersecurity issues.¹ This docket involves all types of communications companies, including the wireless industry over which this Commission has no jurisdiction, and this docket is taking a national approach to the security and reliability of the national communications network. Further, the FCC recognizes the sensitivity of the confidential information that must be reviewed in the docket and has far better protections in place than are available to the Commission.

As noted in the July 24, 2015 comments filed by the Missouri Small Telephone Company Group and the Missouri Independent Telephone Company Group (STCG) companies, on March 19, 2015, the FCC on behalf of the Public Safety and Homeland Security Bureau (“Bureau”) issued a notice seeking comment on the Cybersecurity Risk Management and Best Practices Report (“Report”) submitted by the fourth Communications Security, Reliability and Interoperability Counsel (“CSRIC IV”) filed in PS Docket No. 15-68. The FCC had tasked the CSRIC IV with recommending voluntary mechanisms to assure the FCC and the public that telecommunications providers are taking the necessary measures to manage cybersecurity risks. The comment cycle has been completed in this docket and industry input is currently under consideration by the Bureau.

¹ *In the Matter of CSRIC IV Cybersecurity Risk Management and Assurance Recommendations*, PS Docket No. 15-68.

CenturyLink agrees with the STCG that this docket will result in duplicative, inconsistent, or irreconcilable reporting requirements. The Report recognizes that cybersecurity best practices must be company-specific and will necessarily differ based on a company's business needs, size, and threat environment. *See e.g.* Final March 2015 Report, Section 9.9, *Small and Medium Business, Cybersecurity Risk Management and Best Practices*, pp. 370-397. This Commission's actions could create conflicting requirements for both the large and small ILECs in Missouri.

Further CenturyLink guards its cybersecurity practices jealously for obvious reasons. Should information pertaining to the management of cybersecurity protections employed by CenturyLink somehow become compromised in the hands of the Commission, then the very thing this Commission is attempting to achieve – the security of Missouri's communications network – will be compromised as well. CenturyLink's cybersecurity practices are also intertwined between its state, national and international products most of which this Commission does not regulate. To try to break out local and interexchange telecommunications services *in Missouri* for analysis from the complex, comprehensive system that CenturyLink has in place is very nearly impossible.

Because the FCC is already pursuing an extensive, national effort to develop macro-level best practices for telecommunications cybersecurity that take into account company size, potential for security exposure, and other key factors, CenturyLink respectfully requests that the Commission decline to mandate responses by telecommunications carriers to the lengthy list of questions filed by Staff.

Finally, it should be noted again that the FCC has regulatory authority over a much larger range of communication services, including wireless carriers and broadband providers. Its

ability to consider a far more comprehensive recommendation, based on the size and services of each provider, seems much more efficient than the limited jurisdiction of this commission over a much smaller subset of telecommunications providers. To impose the unnecessary burden of responding to Staff's lengthy list of questions on a small subset of voice service providers creates an unfair regulatory burden on CenturyLink and other Missouri- regulated telecommunications companies.

CONCLUSION

CenturyLink respectfully requests that the Commission decline Staff's amended request to require incumbent and competitive local exchange telecommunications companies to respond to its lengthy list of cybersecurity questions for the reasons stated in this response.

DATED: July 27, 2015

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was served electronically on this 27th day of July, 2015, to:

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