

Diamond Williams

From: Cooper, Roberta G [Roberta.G.Cooper@CenturyLink.com]
Sent: Friday, September 02, 2011 11:51 AM
To: Filings@psc.state.fl.us
Cc: Masterton, Susan S; Khazraee, Sandy A
Subject: Docket No 110224-TP Correction and Clarification of CenturyLink's Post-workshop Comments
Attachments: 110224 Correction and Clarification of CTL Post Workshop Comments.pdf

Filed on Behalf of: Susan S. Masterton
Senior Counsel
CenturyLink
315 S. Calhoun Street, Suite 500
Tallahassee, FL 32301
Telephone: 850/599-1560
Email: susan.masterton@centurylink.com

Docket No. 110224-TP

Title of filing: Correction and Clarification of CenturyLink's Post-workshop Comments

Filed on behalf of: CenturyLink

No of pages: 1

Description: Correction and Clarification of CenturyLink's Post-workshop Comments

Roberta Cooper

Legal Assistant III- Susan Masterton and Kevin Zarling
Voice: 850-599-1563 | Fax: 850-224-0794
Email: Roberta.G.Cooper@centurylink.com
315 S. Calhoun Street, Suite 500 | Tallahassee, FL 32301
Mailstop: FLTLHZ0501-5001

This e-mail may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender and delete all copies of the message.

DOCUMENT NUMBER-DATE

06352 SEP -2 =

FPSC-COMMISSION CLERK

9/2/2011



CenturyLink™

Susan S. Masterton
Senior Counsel

FLTLHZ0501-507
315 S. Calhoun St., Suite 500
Tallahassee, FL 32301
Tel: 850.599.1560

September 2, 2011

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 110224-TP
Correction and Clarification of CenturyLink's Post-workshop Comments

Dear Ms. Cole:

CenturyLink has become aware that in its post-workshop comments filed on August 29, CenturyLink misunderstood, and therefore inadvertently misrepresented, staff's proposed changes to the regulatory assessment fee (RAF) rule as they relate to minimum RAFs. Although the rule changes appear to decrease the minimum RAF for all local service providers from \$1,000 to \$600, CenturyLink now understands that the \$1,000 minimum RAF in the current rule applies only to incumbent local exchange companies, while competitive local exchange companies currently are subject to a minimum RAF of \$600. Therefore, the 40% decrease in the minimum RAF would apply only to those ILECs (if any) who are subject to the minimum fee while CLECs will continue to be subject to the lower \$600 minimum fee that staff now proposes to apply to all "local service providers."

In its suggested changes to the rule, staff appropriately reflects the intent of the 2011 legislation to eliminate the regulatory distinctions among "local service providers" by collapsing the various categories of local providers reflected in the current rule into one. CenturyLink misunderstood the effect of these changes on the various companies who pay the minimum fee today. Nevertheless, CenturyLink stands by its position that the proposed structure of the RAF, where CLECs likely will comprise the majority of companies subject to the minimum fee of \$600 while ILECs will continue to pay revenue-based fees that are many multiples higher than the minimum, no longer reflects the new regulatory reality brought about by the 2011 legislation where the Commission's primary focus will be on wholesale relationships.

Sincerely,

/s/ Susan S. Masterton
Susan S. Masterton

cc: Kathryn Cowdery, Esq.
Beth Salak, FPSC
Ray Kennedy, FPSC

DOCUMENT NUMBER-DATE

06352 SEP-2 =

FPSC-COMMISSION CLERK