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February 26, 2021

**RECEIVED**

**MAR - 1 2021**

Brandon Frey, Executive Secretary  
Louisiana Public Service Commission  
Galvez Building, 12<sup>th</sup> Floor  
602 North Fifth Street  
Baton Rouge, LA 70802

LA Public Service Commission

**Re: Application of CenturyLink Communications, LLC for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Auction (Auction 904) Support for Voice and Broadband Services**

Dear Executive Secretary:

Enclosed for filing are the original and two copies of CenturyLink Communications, LLC's Application for Designation as an Eligible Telecommunications Carrier regarding the above-referenced matter.

An additional copy of the Application is enclosed and we request that it be file-stamped and returned in the enclosed envelope.

If you should have any questions in this regard, please let me know.

Sincerely,

Brook L. Villa

Enclosures

ROUTE TO		ROUTE FROM
DEPT. <u>Bull</u>	DATE <u>3/1</u>	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____

BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION

RECEIVED

MAR - 1 2021

CENTURYLINK COMMUNICATIONS, LLC

LA Public Service Commission

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*In re: Application of CenturyLink Communications, LLC for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Auction (Auction 904) Support for Voice and Broadband Services*

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**CENTURYLINK COMMUNICATIONS, LLC'S  
APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS  
CARRIER TO RECEIVE RURAL DIGITAL OPPORTUNITY FUND (AUCTION 904)  
SUPPORT FOR VOICE AND BROADBAND SERVICES WITH  
REQUEST FOR EXPEDITED CONSIDERATION**

NOW COMES, through undersigned counsel, CenturyLink Communications, LLC ("CLC"), who hereby submits this Application (the "Application") for designation as an Eligible Telecommunications Carrier ("ETC") to the Louisiana Public Service Commission (the "Commission") pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"),<sup>1</sup> Sections 54.201 and 54.202 of the rules and regulations of the Federal Communications Commission ("FCC"),<sup>2</sup> and the requirements of this Commission as set forth in the General Order dated May 20, 2004 ("ETC Order").<sup>3</sup> CLC seeks designation as an ETC in selected census blocks outside of those areas where its ILEC affiliate, CenturyLink of Louisiana, LLC d/b/a CenturyLink ("CTL of Louisiana"), is designated as an ETC. CLC will work with CTL of Louisiana to fulfill obligations pursuant to the federal Rural Digital Opportunity Fund ("RDOF"). CLC respectfully requests that expedited consideration be given to this application

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R §§ 54.201 and 54.202.

<sup>3</sup> Louisiana Public Service Commission, In re: Establishment of public interest criteria applicable to telecommunications carriers seeking Eligible Telecommunications Carrier ("ETC") designation pursuant to 47 U.S.C. § 214(e)(2) in areas served by rural telephone companies, General Order, Docket No. R-27841, May 20, 2004.

and the Commission issue an order designating CLC as an ETC in the State of Louisiana **no later than June 1, 2021**.<sup>4</sup>

CLC's ultimate parent, Lumen Technologies, Inc. (hereinafter "CenturyLink/Lumen"),<sup>5</sup> was selected as a winning bidder in multiple census blocks available in Louisiana under the FCC's Rural Digital Opportunity Fund Phase I Auction (Auction 904) ("RDOF Auction").<sup>6</sup> A map illustrating all areas in Louisiana in which CenturyLink/Lumen was the winning bidder is attached as **Exhibit A**.<sup>7</sup> Following auction procedures and instructions, CenturyLink/Lumen assigned winning bids to CTL of Louisiana, an ETC in Louisiana, which filed the necessary long-form application at the FCC on behalf of all CenturyLink/Lumen affiliates in Louisiana that will be involved in fulfilling RDOF obligations. Specifically, CLC will be fulfilling RDOF obligations for those census blocks won by CenturyLink/Lumen through the RDOF Auction where a CenturyLink/Lumen affiliate is not currently designated as an ETC. Those census blocks are referred to herein as the "Incremental CBs" and are listed in **Exhibit B**. Because CLC is not an ETC, CLC files this application to obtain ETC designation in the Incremental CBs.<sup>8</sup> In support of this Application, CLC attaches, as **Exhibit C**, the Certification of Thomas Freeberg.

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<sup>4</sup> This date is requested given the FCC's date of June 7, 2021 for state commission action on ETC requests. See *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes: Winning Bidders Announced; FCC Form 683 Due January 29, 2021*, 35 FCC Rcd 13888 (2020) at n.15.

<sup>5</sup> On September 14, 2020, CenturyLink, Inc., the ultimate parent of CLC, announced the launch of its "Lumen" brand. Effective September 18, 2020, the stock of CenturyLink, Inc. began trading under the symbol "LUMN." On January 22, 2021, CenturyLink, Inc. formally changed its name to Lumen Technologies, Inc. As a result, the company is now referred to as "Lumen Technologies," or simply "Lumen."

<sup>6</sup> See *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, Public Notice, 35 FCC Rcd 6077 (2020) ("Auction 904 Procedures Public Notice").

<sup>7</sup> The RDOF census blocks shown in **Exhibit A** include the areas inside and outside the service territory of CLC of Louisiana, which is already designated as an ETC. The areas within CTL of Louisiana's service area as denoted on **Exhibit A** are only for context and illustration purposes and are not subject to this Application.

<sup>8</sup> To the extent some of these Incremental CBs may fall both inside and outside a CenturyLink ILEC service area, this Application addresses solely the portion outside of the CenturyLink ILEC service area. Similarly, if any of these Incremental CBs nominally include area inside the service area of an incumbent local exchange carrier subject to federal rate-of-return regulation, those areas were specifically excluded from the RDOF Auction and are not relevant

## **I. COMMUNICATIONS AND CORRESPONDENCE.**

Pleadings, orders, notices, or other correspondence and communications regarding this

Application should be provided to:

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Associate General Counsel  
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301 Main Street, Suite 1200  
Baton Rouge, Louisiana 70801  
225-333-3021  
[Brook.Villa@lumen.com](mailto:Brook.Villa@lumen.com)

## **II. THE COMMISSION HAS AUTHORITY TO GRANT CLC'S ETC DESIGNATION.**

Section 214(e)(2) of the Act authorizes the Commission to designate CLC as an ETC if it meets the requirements of 47 U.S.C. § 214(e)(1). The Louisiana ETC Order sets forth the rules for the Commission to designate an ETC. Accordingly, the Commission has authority to designate CLC as an ETC in the Incremental CBs. As demonstrated below, CLC meets all requirements for ETC designation for purposes of the FCC's RDOF Auction.

## **III. BACKGROUND.**

CLC is a Delaware limited liability company with principal offices located at 100 CenturyLink Drive, Monroe, Louisiana 71203. CLC, by virtue of Certificate Number TSP00572-D, is authorized by this Commission to offer, render, furnish or supply telecommunication services in Louisiana as a Competitive Local Exchange Carrier, a Competitive Access Provider and a Long Distance Carrier. CLC is an indirect, wholly owned subsidiary of CenturyLink/Lumen, which provides high-quality voice and data services to enterprise, government, wholesale, and carrier customers over its IP-based network through its wholly owned indirect subsidiaries, including CLC and CTL of Louisiana.

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here. *Rural Digital Opportunity Fund; Connect America Fund*, WC Docket Nos. 19-126, 10-90, Report and Order, FCC 20-5, 35 FCC Rcd 686 (2020) ¶ 12.

The FCC's RDOF program accelerates the deployment of high-speed fixed broadband service in America. Phase 1 of the RDOF program is being implemented through an auction of census blocks subject to federal price-cap regulation that are wholly unserved according to the FCC's Form 477 reporting. The FCC has authorized RDOF support to companies, like CenturyLink/Lumen, that commit to enable and maintain voice and broadband service meeting the FCC's requirements throughout the RDOF census blocks for the duration of the program. The deployment schedule includes milestones of 40% of the awarded locations statewide by the end of the third full calendar year following funding authorization, and 20% each year thereafter, resulting in 100% deployment to funded locations by the end of the sixth calendar year.<sup>9</sup>

In Louisiana, CenturyLink/Lumen was the winner of the RDOF Auction for areas with funding of approximately \$18.7 million, spread over 10 years.<sup>10</sup> RDOF funding will begin in January 2022. CenturyLink/Lumen will receive RDOF funding and take on obligations, through CLC, in the Incremental CBs, which are 206 census blocks listed in **Exhibit B** outside of the CTL of Louisiana service area in Louisiana.<sup>11</sup>

The RDOF support will enable CLC to extend broadband and voice services to the Incremental CBs identified in Exhibit B. CLC will build its own fiber-to-the-premise network and will resell voice services in advance of construction.

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<sup>9</sup> *Rural Digital Opportunity Fund et al.*, WC Docket No. 19-126 et al., Report and Order, 35 FCC Rcd 686, 696, para. 45 (2020). Recipients will have an additional year to come into compliance with 100% enablement, and an additional two years to enable any additional locations that emerge over the first half of the decade.

<sup>10</sup> See, *Auction 904 Procedures Public Notice*, Attachment A: "Winning Bidders Summary" at page 6 of 30. The link for Attachment A is as follows: <https://docs.fcc.gov/public/attachments/DA-20-1422A2.pdf>.

<sup>11</sup> Another local exchange carrier subject to federal price cap regulation is the designated incumbent local exchange carrier in each of these incremental census blocks.

#### **IV. CLC'S FINANCIAL AND TECHNICAL QUALIFICATIONS.**

With the financial backing of its parent, Lumen Technologies, Inc., CLC possesses the financial and technical capabilities to pay for all expenses, including but not limited to construction, hardware, and operations, to build its fiber network and commence the provision of voice and broadband services through the Incremental CBs. If necessary, CLC will be able to obtain the requisite financing under its existing lines of credit and will be able to obtain additional financing, if necessary, in addition to the awarded RDOF Phase I support.

#### **V. CLC MEETS THE FEDERAL STATUTORY AND REGULATORY PREREQUISITES TO BE DESIGNATED AS AN ETC IN THE INCREMENTAL CBs.**

As demonstrated herein, CLC satisfies each of the federal statutory and regulatory requirements to be an ETC.

##### **A. CLC is a Common Carrier.**

Pursuant to Section 214(e)(2) of the Act, a "State commission shall on its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission."<sup>12</sup>

Section 214(e)(1) of the Act in pertinent part provides:

A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received –

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

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<sup>12</sup> 47 U.S.C. § 214(e)(2).

For the purposes of this designation, CLC will provide broadband internet access and standalone voice service to the public in the Incremental CBs on a common carrier basis. CLC is a common carrier for purposes of 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d).<sup>13</sup>

**B. CLC Will Offer Supported Services Using Its Own Facilities and/or Resale of Another Carrier or Affiliate Service.**

Pursuant to 47 C.F.R. § 54.201(d)(1), CLC will satisfy the requirement for offering the service supported by RDOF in the Incremental CBs using its own facilities or through facilities and services of another carrier/affiliate.

**C. CLC Will Offer the Services Supported by Federal Universal Support Mechanisms.**

As required by 47 C.F.R. § 54.101, CLC, either directly or through an affiliate, will offer voice services and broadband Internet access services supported by federal universal service support mechanisms, including the following capabilities within the Incremental CBs.

**1. Voice Grade Access to the PSTN**

For RDOF purposes, CLC, itself or through facilities and services of another carrier/affiliate, will provide voice grade access to the PSTN or its functional equivalent on a standalone basis in the Incremental CBs consistent with the FCC's high-cost universal service support rules applicable to it.<sup>14</sup> CLC primarily will be provisioning voice telephony, where requested by a customer, using Voice-over-Internet Protocol ("VoIP") technology. In the locations listed in **Exhibit B**, CLC's telephony voice service will include access to emergency services (including 911 or E911 where available), minutes of use for local service provided at no additional charge to end users, and toll limitation services to qualifying low-income customers in accordance with

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<sup>13</sup> A "common carrier" is defined as "any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio[.]" 47 U.S.C. § 153(10).

<sup>14</sup> CLC and its affiliates respectfully reserve all rights, claims and defenses relating to non-jurisdictional technologies that may be used to provision services under the RDOF Auction, nor should any reference of such technologies in this filing construed as a waiver of any rights, claims, and defenses that may be asserted.

47 C.F.R. §§ 54.500, *et seq.* Further, CLC will offer voice services on a standalone basis at rates that are reasonably comparable to urban rates, consistent with federal benchmarks.

## **2. Broadband Internet Access Services**

Pursuant to 47 C.F.R. § 54.101(a)(2), CLC will offer broadband internet access service with the capability to transmit data to, and receive data by wire or radio from, all or substantially all internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service. CLC will offer broadband at rates that are reasonably comparable to rates offered in urban areas.

## **3. Lifeline Service**

As part of the voice-grade access to the PSTN, an ETC must provide minutes of local service at no additional charge to end-users. The FCC has not specified a minimum amount of local usage that an ETC must offer. CLC will offer voice rate plans in the Incremental CBs that include local calling at no additional charge and will comply with any and all minimum local usage requirements adopted by the FCC or states with jurisdiction over CLC's standalone voice service.

CLC commits that the above services will be provided consistent with applicable high-cost universal service support rules (47 C.F.R. § 54.101(c)) in the Incremental CBs. CLC will also ensure that Lifeline voice and broadband Internet services are offered in accordance with the FCC's rules in the Incremental CBs,<sup>15</sup> on its own or through affiliate CTL of Louisiana, which has substantial experience in providing Lifeline services. CLC will offer Lifeline discounts to qualifying low-income consumers consistent with the FCC's Lifeline rules in the RDOF-funded census blocks.<sup>16</sup>

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<sup>15</sup> 47 C.F.R. § 54.101(d).

<sup>16</sup> *See*, 47 C.F.R. §§ 54.101(c), 54.805-54.806.



**D. CLC Will Provide the Supported Services Throughout the Incremental CBs.**

As noted above, CLC will provide the supported services throughout the Incremental CBs listed in **Exhibit B** as required by 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d).

**E. CLC Will Advertise the Availability of its Universal Service Offerings and Charges for Such Offerings Using Media of General Distribution.**

Pursuant to 47 U.S.C. § 214(e)(2) and 47 C.F.R. § 54.201(d), CLC, itself or in conjunction with an affiliate, will advertise the availability and rates of each of the supported services detailed above and the availability of Lifeline benefits in the Incremental CBs using media of general distribution designed to reach those likely to qualify for the service(s).

**F. CLC Will Use Federal Universal Service Support Only for Intended Purposes.**

CLC certifies that, in accordance with 47 U.S.C. § 254(e) and 47 C.F.R. § 54.7(a), it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the universal service support is intended.

**VI. DESIGNATION OF CLC AS AN ETC IS IN THE PUBLIC INTEREST CONSISTENT WITH FEDERAL AND LOUISIANA LAW.**

Expedited designation of CLC as an ETC in the Incremental CBs in Louisiana will serve the public interest by ensuring that CLC is eligible to receive federal USF support, including the RDOF support it won through the auction, and expand broadband coverage in and throughout the Incremental CBs in Louisiana. CenturyLink/Lumen has been provisionally awarded \$262 million in federal support over 10 years across 20 states. In Louisiana, CenturyLink/Lumen has been provisionally awarded \$18.7 million, which will directly benefit the citizens in the Incremental CBs. The FCC has determined that the voice and broadband services CLC will deploy through RDOF support will advance the goal of RDOF to “ensure continued and rapid deployment of broadband networks to unserved Americans.”<sup>17</sup> RDOF support will allow CLC to accelerate

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<sup>17</sup> *Rural Digital Opportunity Fund; Connect America Fund*, WC Docket Nos. 19-126, 10-90, Report and Order, FCC 20-5, 35 FCC Rcd 686 (2020) at para. 5.

service for those who need it most and prioritize deployment to the underserved in the Incremental CBs.

## **VII. DESIGNATING CLC AS AN ETC SATISFIES THE COMMISSION'S PUBLIC INTEREST CRITERIA SET FORTH IN THE ETC ORDER.**

In the ETC Order, the Commission adopted thirteen (13) factors that would be applied, on a case-by-case basis, to requests for ETC designation in rural areas. The Commission established these criteria against a background of different historical policies and considerations based upon impact on rural incumbent local exchange companies ("RLECs"). The Order predates the various federal funding initiatives such as the Connect America Fund ("CAF") and now RDOF, and the Commission has not yet updated its factors to reflect these changed initiatives. CLC's request for ETC designation in the Incremental CBs fulfills the LPSC factors as they should be applied in connection with the RDOF program.

### **A. Benefits of Increased Competitive Choice Resulting from the Designation.**

Because of the RDOF guidelines, CLC will be developing and offering services that are not currently available to residents in the Incremental CBs. The landline services currently available are less than 25Mbps/3Mbps. CLC will be offering services at nearly 40 times those speeds. The residents and businesses in the areas will receive access to advanced broadband Internet and voice services previously unavailable in these areas.

### **B. Impact of Multiple Designations on the Universal Service Fund.**

Through RDOF, the FCC has designated a fixed sum of money, specifically \$20.4 billion, to provide voice and broadband Internet services in eligible census blocks throughout the country. The Incremental CBs are included within those eligible census blocks. As such, designating CLC as an ETC so that it may receive a share of the funds allocated specifically for the provision, maintenance and upgrading of facilities should have no impact on the Universal Service Fund.

**C. Unique Advantages and Disadvantages of the Competitive Service Area Offering.**

CLC will offer fiber-based gigabit and VoIP services that are not currently available in many areas of Louisiana. These services will transform the areas where they are deployed, offering residents with world-class offerings and opportunities for virtual learning, work from home, entertainment, gaming, etc., thereby eliminating the urban/rural broadband gap. These broadband offerings will allow residents to work remotely, adding job growth in these rural areas that would not be available without the broadband services CLC will provide. Once the network is in place, other businesses will be able to expand and locate their offices in these areas because of the expanded broadband opportunities. To compensate for the lack of central-office provided power for the fiber service, CLC will offer 24-hour battery back-up as an option for customers as required by applicable rules and regulations.

**D. Commitment to Quality of Service.**

CLC will comply with the service and performance requirements applicable to the support that it receives, including the performance requirements and deployment milestones associated with RDOF support. Further, CLC will comply with all applicable state and federal consumer protection and service quality standards associated with the receipt of RDOF support.

**E. Submission of Records and Documentation, on a Quarterly Basis, Declaring that Carrier's Plans for Use of Universal Service Funding Received as a Result of this Commission's Designation, including Updates as to the Progress of Said Projects.**

As an RDOF Auction participant obtaining ETC designation and/or constructing network facilities, CLC must annually submit FCC Form 481, along with broadband deployment reports, to the Universal Service Administrative Company ("USAC"). The Commission is authorized to access CLC's Form 481 filings through USAC, as well as the broadband deployment reporting data that is submitted to USAC's HUBB Portal. Form 481 provides financial and operations information that may be used to validate an ETC's use of high cost support funds. Additionally,

the HUBB calculates an ETC's progress towards meeting its broadband build-out obligations, including any interim deployment milestones.

To the extent additional reports are required in connection with CLC's provision of supported services in the Incremental CBs, CLC commits to make them available to the Commission upon request.

**F. For Wireless Carriers, Compliance with the CTIA Consumer Code for Wireless Services and Submission of the Number of Consumer Complaints per 1000 Mobile Headsets to the LPSC on a Quarterly Basis.**

This provision is not applicable to CLC.

**G. Information Regarding the Number of Requests for Service in the Designated Area that Go Unfulfilled.**

Once CLC has deployed fiber and launched services in the Incremental CBs, CLC will provide supported services to requesting customers within a reasonable amount of time upon request. As an RDOF Phase I support recipient, CLC must meet certain buildout milestone deadlines and service requirements over the next several years. The FCC eliminated its prior requirement that ETCs report unfulfilled service requests as being both subjective and unnecessary in light of the current broadband deployment reporting obligations under the modified federal high-cost universal service programs.<sup>18</sup> CLC will provide RDOF supported service to customers residing in the Incremental CBs on a timely basis after receipt of a customer's reasonable request for such service.

**H. Compliance with All Existing and Future and State and Federal 911 and E-911 Mandates.**

CLC will maintain compliance with both applicable federal and state requirements for providing 911 and E-911 services to its customers in the Incremental CBs.

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<sup>18</sup> *Connect America Fund et al., ETCs Annual Reports and Certifications*, WC Docket Nos. 10-90, 14-58, Report and Order, 32 FCC Rcd 5944, 5945-47, ¶¶ 6-9 (2017).

**I. Compliance with Section 401B of the Commission's Regulations for Competition in the Local Telecommunications Market.**

CLC is neither a commercial mobile radio service nor a private mobile radio service. As such, this provision is not applicable to CLC.

**J. Compliance with Section 302(A) of the Commission's Regulations for Competition in the Local Telecommunications Market (Annual Report Filings).**

Section 302(A) was deleted by General Order No. R-31839 dated March 11, 2014 and is no longer applicable.

**K. Compliance with Sections 301A-C and 401 of the Commission's TSP Billing Order.**

CLC has been, and will continue to be, compliant with Sections 301A-C and 401 of the Commission's Regulations. In the Incremental CBs, CLC will send a printed bill at least once a month to a customer unless the customer agrees to accept billing in electronic form.

**L. Compliance with any additional requirements established by the Commission in Docket R-27733, *In Re: Establishment of Reporting Requirements for Telecommunications Service Providers Designated as Eligible Telecommunications Carriers ("ETCs") by the Commission.***

CLC is not aware of any additional ETC reporting requirements that have been adopted by the Commission as a result of Docket R-27733, which has been dormant since 2006. However, CLC agrees to comply with any new requirements that are adopted that are applicable to its operation as an ETC in the Incremental CBs.

**M. A Rural Cream-Skimming Analysis.**

This provision is not applicable. The Incremental CBs do not appear to be in an area served by a rural telephone company. Even if they are, the FCC defined the service area and, in its Rural Digital Opportunity Fund Report and Order dated February 7, 2020, the FCC concluded:

... for those entities that obtain ETC designations as a result of being selected as winning bidders for the Rural Digital Opportunity Fund, we forbear from applying section 214(3)(5) of this Act, insofar as this section requires that the service area of such an ETC conform to the service area of any rural telephone company serving an area eligible for Rural Digital Opportunity Fund support.<sup>19</sup> \*\*\* Accordingly, Commission rules regarding the redefinition process are inapplicable to petitions that are subject to this order.<sup>20</sup>

#### **VIII. REQUEST FOR EXPEDITED CONSIDERATION.**

CLC must demonstrate to the FCC that it or an affiliate has been designated as an ETC in each of the census blocks where CenturyLink/Lumen was the winning bidder in the RDOF Auction. The FCC's deadline for such documentation is June 7, 2021. Accordingly, CLC respectfully requests that the Commission issue an order approving this Application by **no later than June 1, 2021**.

#### **IX. CONCLUSION AND PRAYER FOR RELIEF**

In conclusion, as described above, CLC satisfies all Louisiana and federal requirements for ETC designation in the Incremental CBs. Furthermore, designating CLC as an ETC for purposes of receiving RDOF support is in the public interest because it will enable CLC to receive support that will facilitate deployment of broadband and voice service in the Incremental CBs in Louisiana.

**WHEREFORE**, for the reasons stated herein, CLC respectfully requests that the Commission designate CenturyLink Communications, LLC as an ETC in the Incremental CBs identified in **Exhibit B** by no later than June 1, 2021 and order such other relief as may be appropriate.

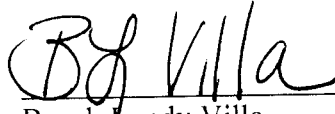
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<sup>19</sup> *Rural Digital Opportunity Fund; Connect America Fund*, Report and Order, 35 FCC Rcd 686 (2020) at ¶ 94.

<sup>20</sup> *Id.* at n.268.

Respectfully submitted, this 26<sup>th</sup> day of February, 2021.

**CenturyLink Communications, LLC**

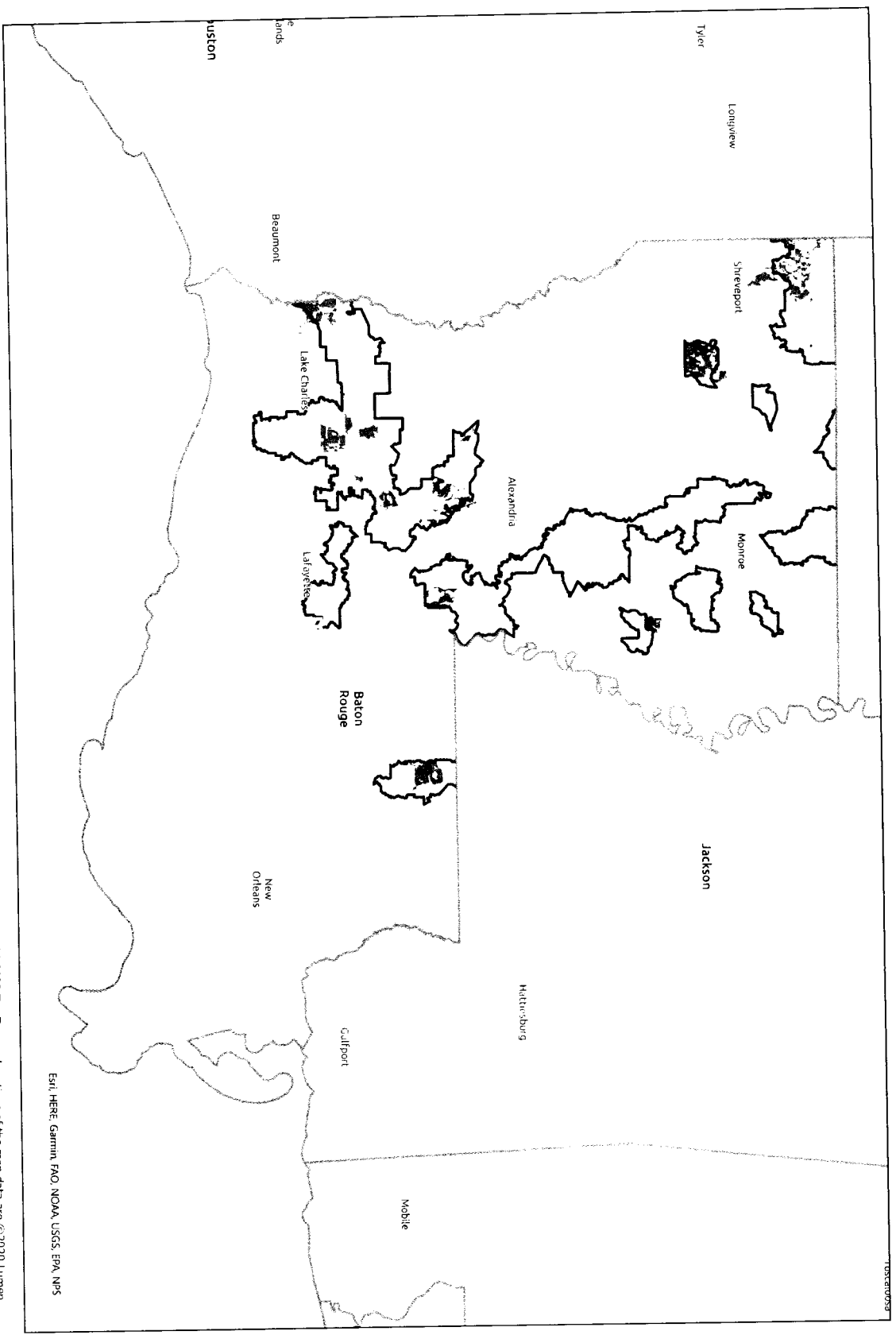
A handwritten signature in black ink, appearing to read "BJ Villa", written over a horizontal line.

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# LUMEN® Louisiana Lumen Won RDOF Areas

## Exhibit A

**Support (10y)**      **Locations**  
 \$18,742,492.20      7,616



Winning bidder Rural Digital Opportunity Fund (RDOF) information: RDOF Source: <https://auctiondata.fcc.gov/public/projects/auction904>. Portions of the map data are ©2006-2020 TomTom and portions of the map data are ©2020 Lumen.




**Exhibit B**  
**CenturyLink Communications, LLC**  
**Louisiana Incremental Census Blocks**


220090309002119	220170248001346	220170249001141	220399501002061	220419504003134
220090309002148	220170248001360	220170249001143	220399501002072	220419504003138
220090309002159	220170248001365	220170249001149	220419504003000	220419504003140
220139703001083	220170248001368	220170249001151	220419504003002	220419504003144
220139703001091	220170248001371	220170249001160	220419504003004	220419504003145
220139703001094	220170248001372	220170249001164	220419504003005	220419504003150
220139703001096	220170248001375	220170249001167	220419504003009	220419504003152
220139703001098	220170248001380	220170249001296	220419504003011	220419504003160
220139703001105	220170248001381	220170249001315	220419504003015	220419504003165
220139703001106	220170248001382	220170249001316	220419504003017	220790135001001
220139703002000	220170248001384	220170249001317	220419504003018	220790135001005
220139704001002	220170248001391	220170249001319	220419504003019	220790135001006
220139704001009	220170248001392	220170249003008	220419504003023	220790135001007
220139704001013	220170248001395	220170249003009	220419504003029	220790135001008
220139704001014	220170248001396	220170249003038	220419504003032	220790135001011
220139704001015	220170248001406	220190036001090	220419504003034	220790135001018
220139704001018	220170248001407	220190036003003	220419504003039	220790135001022
220139704001021	220170248001408	220190036003004	220419504003040	220790135001036
220139704001024	220170248001412	220190036003005	220419504003044	220790135001048
220139704001027	220170248001415	220190036003008	220419504003046	220790135001049
220139704001028	220170248001425	220190036003020	220419504003047	220790135001052
220139704001030	220170248001430	220190036003025	220419504003048	220790135001082
220139704001038	220170248001432	220190036003032	220419504003050	220790135005083
220139704001042	220170248001433	220190036003038	220419504003051	220919511003046
220139704001043	220170248001434	220190036003039	220419504003054	220919511003051
220139704001044	220170248001435	220190036003057	220419504003055	220919511003054
220139704001045	220170248001436	220190036003060	220419504003059	
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## Certification of CenturyLink Communications, LLC

BEFORE ME, the undersigned authority, personally came and appeared Thomas R. Freeberg and, after being first duly sworn, did depose and state:

- I certify under penalty of perjury that the foregoing is true and correct.

  
Thomas R. Freeberg

 **BONITA LEE LUNDEEN**  
NOTARY PUBLIC-MINNESOTA  
My Comm. Exp. Jan. 31, 2025

  
Notary Public