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ORIGINAL

AZ CORP COMMISSION  
DOCKET CONTROL

March 27, 2012

**OVERNIGHT DELIVERY**

Docket Control  
Arizona Corporation Commission  
1200 W. Washington St.  
Phoenix, AZ 85007

Re: *AT&T's Objections to Proposed Tariff Revisions of Qwest Corporation d/b/a CenturyLink QC; Docket No. T-01051B-11-0448*

Dear Sir or Madam:

On December 14, 2011, CenturyLink filed tariff revisions in the above-referenced docket. CenturyLink's revisions purport to implement the VoIP-PSTN provisions of the FCC's November 18, 2011 Report and Order on universal service and intercarrier compensation (the "FCC Order"). The purpose of this letter is to object to the portions of the tariff that are inconsistent with the FCC Order.

Specifically, Section 2.3.10(F)(1) of CenturyLink's revised tariff calculates the Percent VoIP Usage ("PVU") factor based solely on IP traffic at the customer's end of the call. There is no mechanism for addressing traffic that originates or terminates in IP on CenturyLink's end. This is inconsistent with the FCC Order, which adopted the interstate access rate as the default rate to be charged for all traffic exchanged over PSTN facilities that originates *and/or* terminates in IP format. The reason for this omission could be that CenturyLink does not currently provide retail VoIP services. If this is the case, then the company should be required to certify this claim. Also, the tariff should be revised to include calculation of a company PVU factor that will account for calls that originate or terminate from CenturyLink's own end user customers (in the event that the company provides VoIP-based end-user services in the future).

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Accordingly, AT&T respectfully requests that the Arizona Corporation Commission order CenturyLink to revise and refile its tariff to address these issues.

Very truly yours,

AT&T *Sharon Mullin*  
*by Seth Dauteriv, w/permission*

By: Sharon Mullin  
Director  
AT&T Services, Inc.

**Original and 13 copies**  
Filed with Docket Control  
This 27<sup>th</sup> day of March, 2012.