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December 3, 2018

Application No. 1

Proposed CenturyLink Competitive Operating Companies

Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, DC 20554

Attention:
Wireline Competition Bureau

Dear Secretary:

CenturyLink, Inc. ("CenturyLink"), a holding company owning multiple Competitive Access Service subsidiaries, would like to consolidate the interstate tariffs of CenturyLink Communications, LLC, Broadwing Communications, LLC, Global Crossings Local Services, Inc., Level 3 Communications, LLC, Level 3 Telecom Holdings, LLC and TelCove Operations, LLC under a new filing entity CenturyLink Competitive Operating Companies.

To accomplish this, CenturyLink proposes to cancel the following Tariffs:

- CenturyLink Communications, LLC Tariff F.C.C. No. 1
- Broadwing Communications, LLC Tariff F.C.C. No. 1
- Global Crossings Local Services, Inc. Tariff F.C.C. No. 19
- Level 3 Communications, LLC Tariff F.C.C. No. 4
- Level 3 Telecom Holdings, LLC Tariff F.C.C. No. 1
- TelCove Operations, LLC Tariff F.C.C. No. 1

And, at the same time, issue six (6) new tariffs under the name "CenturyLink Competitive Operating Companies". The current tariffs along with the proposed CenturyLink tariff numbers that will replace existing tariffs is shown on Attachment A. Organizational changes will be made to the tariffs, but no changes to rates or substantive changes to regulations will occur.

This Application for special permission requests waiver of the requirements of Sections 61.52(a)(1) and (2), 61.54(c)(4), 61.54(i)(1), 61.59 and 61.74 of Part 61 of the Federal Communications Commission's Rules in connection with the proposed issuance of CenturyLink Competitive Operating Companies Tariff (CCOC) F.C.C. Nos. 1, 2, 3, 4, 5 and 6. CenturyLink submits that a grant of this waiver is in the public interest and requests that the waiver be granted for the purposes detailed below:

- (1) Waiver of Section 61.52(a)(1) is requested to permit CenturyLink to place the name "CenturyLink Competitive Operating Companies" on each tariff sheet and waiver of Section 61.52(a)(2) to permit the use of the name "CenturyLink Competitive Operating Companies" on the title page of each tariff. CenturyLink intends to include the exact legal name of the carrier covered by the tariffs in the "Issuing Carrier" sections of the tariffs. The names of the CenturyLink Competitive Operating Companies are identified in Attachment A.

- (2) Waiver of Sections 61.54(c)(4) and 61.54(i)(l) is requested to permit CCOC Tariff F.C.C. Nos. 1, 2, 3, 4, 5 and 6 to not use margin coding or other notations to show text changes or moved material as would otherwise be required by these rules. All such changes will be non-substantive changes made to reflect organizational changes in the tariffs.
- (3) Waiver of Section 61.59 is requested so the CenturyLink may make tariff filings affecting the CenturyLink tariffs during the review period and for 30 days following the tariff's effective date, however, no filing made during the review period will have an effective date prior to the effective date of the new tariffs. The waiver would permit CenturyLink to make filings that would otherwise be permitted or required, but for the 30-day minimum effective period required by Section 61.59. CenturyLink does not anticipate making any such changes but seeks this waiver out of an abundance of caution and in the absence of knowledge of the what the Commission may require in the future.
- (4) Waiver of Section 61.74 of the Commission's rules to permit CenturyLink to continue to reference in the new tariff the same cross-references to which the Commission has previously granted a waiver of waivers of this rule, and which are not currently allowed by Section 61.74.

CenturyLink submits that a grant of the requested waivers is in the public interest in that the proposed CenturyLink tariffs will carry forward the rates and regulations found in the existing Tariffs, without change, while reducing the administrative burden of the companies' customers and of the Commission staff by eliminating unnecessary blank pages and sequentially numbering each tariff section.

Attachment B provides an overview of proposed changes to each of the CenturyLink Competitive Operating Companies tariffs.

In accordance with Section 61.14, this application for special permission and associated attachments are being filed electronically via the Federal Communications Commission's Electronic Tariff Filing Systems (ETFS) in compliance with the electronic filing procedures.

The Tariff filing fee in the amount of \$960.00 is being paid by credit card through the appropriate entries in Section E of the ETFS generated Form 159.

All correspondence and inquiries in connection with this filing, including service copies of petitions, should be directed to:

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Attachments

- Attachments A Proposed Tariffs
- Attachment B Overview of Proposed Changes to Tariff
- Attachment C Illustrative Tariff Pages
- Attachment D Cancelled Illustrative Tariff Pages