



WILLIAM E. HENDRICKS

October 5, 2012

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol Street NE, Ste 215  
Salem, OR 97301-2551

RE: AR 566 – Reply Comments

Dear Commission:

Thank you for this opportunity to comment. CenturyLink stands on its Initial Comments, with only one response to comments of the parties. CenturyLink agrees with parties that commented that if the Commission adopts a rule, it should be very clear that the rule must only address *call termination*. Any rule should not attempt to address issues related to intercarrier compensation. There are not sufficient facts before the Commission to promulgate rules regarding these other issues. Should the Commission adopt a rule, it should ensure the singular function of the rule is to improve the ability of carriers to adequately terminate intrastate, interexchange calls in the state of Oregon.

CenturyLink appreciates the Commission's efforts in this matter. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "W. Hendricks", written over a blue circular stamp.

William E. Hendricks  
Senior Corporate Counsel

cc: Service List

902 Wasco St.  
Hood River, OR 97031  
Tel. 541.387.9439  
Fax. 541.400.8421  
tre.hendricks@centurylink.com

## CERTIFICATE OF SERVICE VIA E-MAIL TRANSMISSION

AR 566

I hereby certify that on the 5<sup>th</sup> day of October, 2012, a true and correct copy of the foregoing CENTURYLINK'S REPLY COMMENTS, in the above entitled docket, was served upon the following persons via means of e-mail transmission to the e-mail addresses listed below.

Charles L Best  
Attorney At Law 1631  
NE Broadway, #538  
Portland OR 97232-1425  
[chuck@charleslbest.com](mailto:chuck@charleslbest.com)

Williams, Kastner & Gibbs PLLC  
Marc M. Carlton  
888 SW Fifth Ave., Ste. 600  
Portland, OR 97204-2025  
[mcarlton@williamskastner.com](mailto:mcarlton@williamskastner.com)

Verizon  
Rudolph M. Reyes  
201 Spear Street 7th Flr.  
Sanfrancisco, CA 94105  
[rudy.reyes@verizon.com](mailto:rudy.reyes@verizon.com)

Roberta Vandehey  
Star Route  
Fossil, OR 97830  
[robertav2@yahoo.com](mailto:robertav2@yahoo.com)

AT&T  
Cynthia Manheim  
PO Box 97061  
Redmond, WA 98052  
[cm9268@att.com](mailto:cm9268@att.com)

AT&T Communications of the  
Pacific Northwest Inc  
David Collier  
645 E Plumb Lane  
PO Box 11010  
Reno, NV 89502  
[david.collier@att.com](mailto:david.collier@att.com)

AT&T Services, Inc.  
Sharon L Mullin  
816 Congress Ave  
Austin, TX 78701  
[sm3162@att.com](mailto:sm3162@att.com)

CenturyLink  
Ron L Trullinger  
310 SW Park Ave., 11th Fl  
Portland, OR 97205  
[ron.trullinger@centurylink.com](mailto:ron.trullinger@centurylink.com)

CenturyLink  
William E. Hendricks  
902 Wasco St., A0412  
Hood River, OR 97031  
[tre.hendricks@centurylink.com](mailto:tre.hendricks@centurylink.com)

Citizens' Utility Board of Oregon  
610 SW Broadway, Ste 400  
Portland, OR 97205  
[dockets@oregoncub.org](mailto:dockets@oregoncub.org)

Citizens' Utility Board of Oregon  
610 SW Broadway, Ste 400  
Portland, OR 97205  
[dockets@oregoncub.org](mailto:dockets@oregoncub.org)

Citizens' Utility Board of Oregon  
610 SW Broadway, Ste 400  
Portland, OR 97205  
[dockets@oregoncub.org](mailto:dockets@oregoncub.org)

Sommer Templet  
610 SW Broadway, Ste. 400  
Portland OR 97205  
[sommer@oregoncub.org](mailto:sommer@oregoncub.org)

Comcast Business Communications  
Doug Cooley  
1710 Salem Industrial Drive NE  
Salem, OR 97303  
[doug\\_cooley@cable.comcast.com](mailto:doug_cooley@cable.comcast.com)

Davis Wright Tremaine LLP  
Mark P Trinchero  
1300 SW Fifth Ave., Ste 2300  
Portland OR 97201-5682  
[marktrinchero@dwt.com](mailto:marktrinchero@dwt.com)

Frontier Communications  
Northwest Inc  
Renee Willer  
20575 NW Von Neumann Dr  
Beaverton, OR 97006-6982  
[renee.willer@ftr.com](mailto:renee.willer@ftr.com)

Integra Telecom of Oregon Inc  
Douglas K Denney  
1201 NE Lloyd Blvd, Ste 500  
Portland, OR 97232  
[dkdenney@integratelecom.com](mailto:dkdenney@integratelecom.com)

Level 3 Communications LLC  
Gregory Diamond  
1505 5th Ave., Ste 501  
Seattle, WA 98101  
[greg.diamond@level3.com](mailto:greg.diamond@level3.com)

Mcdowell Rackner & Gibson Pc  
Adam Lowney  
419 SW 11th Ave, Ste 400  
Portland, OR 97205  
[adam@mcd-law.com](mailto:adam@mcd-law.com)

Monroe Telephone Co  
John T. Dillard  
PO Box 130  
Monroe, OR 97456  
[jtdillard@monroetel.com](mailto:jtdillard@monroetel.com)

Oregon Exchange Carrier Assn  
Craig Phillips  
1104 Main St., #300  
Vancouver, WA 98660  
[cphillips@oeca.com](mailto:cphillips@oeca.com)

Pac-West Telecomm Inc  
Novi Campbell  
4210 Coronado Ave.  
Stockton, CA 95204  
[ncampbell@pacwest.com](mailto:ncampbell@pacwest.com)

Frontier Communications  
Phyllis Whitten  
9260 E Stockton Blvd.  
Elk Grove, CA 95624  
[phyllis.whitten@ftr.com](mailto:phyllis.whitten@ftr.com)

Integra Telecom  
George Schreck  
1201 NE Lloyd Blvd, Ste 500  
Portland, OR 97232  
[george.schreck@integratelecom.com](mailto:george.schreck@integratelecom.com)

Law Office of Richard A Finnigan  
Richard A. Finnigan  
2112 Black Lake Blvd SW  
Olympia, WA 98512  
[rickfinn@localaccess.com](mailto:rickfinn@localaccess.com)

LS Networks  
Robin Smith  
921 SW Washington St., Ste 370  
Portland, OR 97205  
[rsmith@lsnetworks.net](mailto:rsmith@lsnetworks.net)

Lisa F. Rackner  
419 SW 11th Ave., Suite 400  
Portland, OR 97205  
[dockets@mcd-law.com](mailto:dockets@mcd-law.com)

OCTA  
Michael Dewey  
1249 Commercial St. SE  
Salem, OR 97302  
[mdewey@oregoncable.com](mailto:mdewey@oregoncable.com)

Oregon Telecommunications Assn  
Brant Wolf  
777 13th St SE - Ste 120  
Salem, OR 97301-4038  
[bwolf@ota-telecom.org](mailto:bwolf@ota-telecom.org)

Priorityone Telecommunications  
Jeff Crews  
PO Box 1462  
La Grande, OR 97850  
[jcrews@p1tel.com](mailto:jcrews@p1tel.com)

Public Utility Commission of  
Oregon  
Malia Brock  
PO Box 2148  
Salem, OR 97308  
[malia.brock@state.or.us](mailto:malia.brock@state.or.us)

Fred Goodwin  
PO Box 2148  
Salem, OR 97308  
[fred.goodwin@state.or.us](mailto:fred.goodwin@state.or.us)

Department Of Justice  
Johanna Riemenschneider  
Business Activities Section  
1162 Court St NE  
Salem, OR 97301-4796  
[johanna.riemenschneider@doj.state.or.us](mailto:johanna.riemenschneider@doj.state.or.us)

Department Of Justice  
Jason W. Jones  
1162 Court St NE  
Salem OR 97301-4096  
[jason.w.jones@state.or.us](mailto:jason.w.jones@state.or.us)

Rio Networks.Com  
Scott Warren  
PO Box 1146  
Roseburg, OR 97470  
[scott.w@rionetworks.com](mailto:scott.w@rionetworks.com)

Scio Mutual Telephone Assn  
Thomas J. Barth  
38982 SE 2nd Ave  
Scio, OR 97374  
[tbarth@smt-net.com](mailto:tbarth@smt-net.com)

Tds Telecom Western Region  
Gail Long  
PO Box 1566  
Oregon City, OR 97045-1566  
[gail.long@tdstelecom.com](mailto:gail.long@tdstelecom.com)

Tw Telecom of Oregon LLC  
Lyndall Nipps  
9665 Granite Ridge Dr - Ste 500  
San Diego, CA 92123  
[lyndall.nipps@twtelecom.com](mailto:lyndall.nipps@twtelecom.com)

Verizon  
Richard B. Severy  
2775 Mitchell Dr, Bldg. 8-2  
Walnut Creek, CA 94598  
[richard.b.severy@verizon.com](mailto:richard.b.severy@verizon.com)

Verizon California Inc  
Lorraine A. Kocen  
2523 W Hillcrest Dr, 2nd Flr  
Newbury Park, CA 91320  
[lorraine.kocen@verizon.com](mailto:lorraine.kocen@verizon.com)

Mary Retka  
[mary.retka@centurylink.com](mailto:mary.retka@centurylink.com)

DATED this 5<sup>th</sup> day of October, 2012.

CENTURYLINK



---

By: Carla M. Butler  
310 SW Park Ave., 11<sup>th</sup> Flr.  
Portland, OR 97205  
Telephone: 503-242-5420  
Facsimile: 503-242-8589  
e-mail: [carla.butler@centurylink.com](mailto:carla.butler@centurylink.com)  
Paralegal for CenturyLink