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Mark S. Reynolds
Northwest Region Vice President
Public Policy



October 10, 2012

*Via E-mail and
Overnight Delivery*

Mr. David Danner, Executive Director
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: CenturyLink Proposal for a Rate Center Consolidation in the Gig Harbor Area

Dear Mr. Danner,

In October 2010, at the request of the Washington Commission Staff, CenturyLink completed a Rate Center Consolidation involving the previously separate Rate Centers of Arletta, Lakebay and Fox Island, WA, with Fox Island serving as the surviving Rate Center. After recent internal analysis of this market area, CenturyLink believes it would be beneficial to complete an additional Rate Center Consolidation that would establish Gig Harbor as the Rate Center for Arletta, Lakebay and Fox Island for the following reasons:

1. Arletta, Lakebay, Fox Island and Gig Harbor all have the same local calling scopes and same local rates. No extended area service changes are needed and there are no network changes that would be required.
2. Arletta and Lakebay are remote switches operating off of the Gig Harbor switch. Fox Island has the same switch CLLI code as Gig Harbor.
3. Customers frequently move between these areas – consolidating these offices to a common Rate Center would allow customers to seamlessly port their numbers within a much larger geographic area. The larger pool of numbers will also contribute to improved numbering economy and deferred exhaust of the NPA.
4. Gig Harbor is the logical choice for the consolidated Rate Center as it has the most customers and also serves as the center of the switching complex for this area.

CenturyLink has targeted an effective date of no later than February 1, 2013 for the proposed rate center consolidation, but would implement earlier if Commission approval is granted quickly. To support this effective date, CenturyLink will complete the following activities:

- Provide notification to Telcordia of the Rate Center Consolidation at least 90 days in advance of the effective date.
- Enter updates to the LERG at least 90 days in advance of the effective date.
- File tariff changes to reflect the Rate Center Consolidation with the Commission.

It is our understanding that Telcordia will require confirmation that the Commission has approved the Rate Center Consolidation. CenturyLink has discussed this proposed Rate Center Consolidation with Commission Staff and they have expressed their support for the proposal. Therefore, CenturyLink respectfully requests that the Commission provide written documentation of its support for the proposed Rate Center Consolidation so that it can be provided to Telcordia.

If you have any questions regarding this issue, please don't hesitate to call me.

Sincerely,



Mark Reynolds

MSR/ldj

cc: Rebecca Beaton

William Weinman