

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
DOCKET NO. UT-100820
CENTURYLINK RESPONSES TO
INTEGRA'S FIRST SET OF INFORMATION REQUESTS
NOS. 1 THROUGH 156**

2. Separately for each state in which CenturyLink operates as an ILEC, provide the following:
- a. Number of CLECs who purchase unbundled network elements from CenturyLink.
 - b. Number of unbundled loops purchased from CenturyLink. A complete response will provide loop counts separately for voice-grade, DS1 and DS3 loops.
 - c. Number of wholesale platform arrangements (e.g., UNE-P replacement) purchased from CenturyLink.
 - d. Number of Enhanced Extended Links (EELs) purchased from CenturyLink separated by capacity (voice-grade, DS1 and DS3).
 - e. Number of CLECs who purchase collocation from CenturyLink.
 - f. Number of CLEC collocation arrangements purchased from CenturyLink. A complete response will provide the collocation count separately by collocation type (i.e., caged, cageless and/or virtual).
 - g. Number of resold lines by product type.
 - h. Number of hot cuts performed for the prior year.
 - i. Count of LNP number ports processed by year for the prior 5 year period.
 - j. Number of CLEC trouble tickets submitted by year for the past 5 year period.
 - k. Number of jeopardy (facilities not found) notices sent to CLECs by year for the past five year period.
 - l. CenturyLink employee headcount by year for the prior 5 year period.
 - m. Qwest employee headcount, by year for the prior five year period, of employees providing wholesale services.
 - n. Revenues from wholesale services by year for the prior 5 year period.
 - o. Dollar amount of payments made under wholesale performance plans by year for the previous 5 year period.
 - p. Dollar amount of payments made under retail performance plans by year for the previous 5 year period.

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CenturyLink Objections:

To the extent this request applies to matters other than Washington intrastate operations subject to the jurisdiction of the Commission, CenturyLink objects to such request as irrelevant, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. To the extent this request seeks information for a five year time period, CenturyLink objects to producing the information as overly broad, unduly burdensome, excessively time consuming and not reasonably calculated to lead to the discovery of admissible evidence.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following responses, which includes Washington-specific information as well as information regarding the company as a whole:

- a-k Please see Attachment Integra-2a-k. The information in this attachment is CONFIDENTIAL.
- l CenturyLink had 22,573 employees with 543 in Washington at the end of 2008 and 20,147 employees, with 490 in Washington at the end of 2009.
- m After the CenturyTel/ Embarq merger, there were 536 wholesale employees (7/1/2009) at CenturyLink. At year-end 2009, there were 517. As of the end of May, 2010 there are 505 wholesale employees (including open positions). A count of wholesale employees pre-merger is not available.
- n Please see Confidential Attachment Integra-2n.
- o CenturyLink has made no payments in Washington under a wholesale performance plan.
- p CenturyLink made provided customer billing credits to customers in the legacy Embarq areas under a retail service guarantee plan of \$12,040 in 2008 and \$10,940 in 2009.

Sponsor: Valerie Wright, Manager Product Management - Wholesale; Melissa Cloz, Director Wholesale Operations; Diane Roth, Director Contract Management, Marnie Woodard, Senior Project Management Analyst; Mitch Danforth Manager Revenue Assurance Expense; Mike Jewell Director Special Services Repair & Support

WUTC Docket No. UT-100820
CROSS-EXHIBIT2-JJ-JCX

REDACTED

Confidential Attachment Integra-2a-k