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

Refer to pages 19-20 and footnote 34 of the CenturyTel/Qwest FCC application in Docket WC 10-110.¹

a. Provide a detailed description of CenturyTel's winback programs, including any documentation or training material developed by CenturyTel regarding its winback programs. A complete response will describe the winback

- offerings used by CenturyTel to winback customers after acquiring Embarq.
- b. Regarding footnote 34, provide any support for the statement that the winbacks were based, at least in part, on CenturyTel's record of high-quality and locally-focused service.

c. Does CenturyLink have any plans to employ its winback programs in the Qwest local service territories post-merger? If so, describe those plans and the expected results in detail.

CenturyLink Objections:

б.

CenturyLink objects to this request insofar as it is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence. The scope of this proceeding is to establish whether the merger of the CenturyLink and Qwest parent companies is in the public interest. Specific information regarding the marketing strategies of CenturyLink's operating companies in Washington is not relevant to this analysis. In addition, the information requested is highly confidential, competitively sensitive information, the release of which, particularly to CenturyLink's competitives such as Integra, would cause irreparable competitive harm to CenturyLink.

CenturyLink Supplemental Response (8/9/10):

Subject to and without waiving its objections set forth above, CenturyLink provides the following information:

CenturyLink will contact customers after a disconnection has taken place. CenturyLink makes an effort to bring these customers back to CenturyLink's service. All of CenturyLink's winback marketing efforts comply with state and federal regulations.

Sponsor: Dane Folster, Manager Consumer Program & Retention Management

Available at: http://fjallfoss.fcc.gov/ecfs/document/view?id=7020466794