

**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**

76. Refer to page 13 of John Jones' Direct Testimony in Minnesota Docket No. P-421, et al./PA-10-456, dated June 14, 2010.
- a. Provide a breakdown of the "approximately 2,000" active CLEC contracts by (i) CLEC interconnection agreements, (ii) resale agreements, (iii) commercial agreements, (iv) traffic exchange agreements and (v) other types of agreements.
 - b. Of the active CLEC contracts identified under subpart "a", how many contain language discussing a rural exemption for CenturyLink. For the purposes of this question rural exemption language refers to language such as the following examples: "CenturyLink is a 'rural telephone company' as that term is defined in... Section 251(f)(1) of the Act" or "CenturyLink is exempt from Section 251(c) of the Act, and that notwithstanding, the companies have entered into and accepted this Agreement..." or "execution of the Agreement does not in any way constitute a waiver or limitation of CenturyLink's rights under Section 251(f)..."
 - c. Provide a breakdown of CenturyLink's contracts with the "approximately 60" active CLECs with which CenturyLink has contracts in Washington by (i) CLEC interconnection agreements, (ii) resale agreements, (iii) commercial agreements, (iv) traffic exchange agreements and (v) other types of agreements.
 - d. Separately by the following entities: CenturyTel, Embarq/United, and Qwest, provide the number of active CLEC contracts with each.
 - e. Separately by the following entities: CenturyTel, Embarq/United, and Qwest, how many of the active CLEC contracts contain provisions for a CLEC to purchase unbundled loops.
 - f. Separately by the following entities: CenturyTel, Embarq/United, and Qwest, how many of the active CLEC contracts contain provisions for a CLEC to purchase collocation.
 - g. Separately by the following entities: CenturyTel, Embarq/United, and Qwest, how many of the active CLEC contracts are resale agreements.
 - h. Separately by the following entities: CenturyTel, Embarq/United, and Qwest, how many of the active CLEC contracts pertain only to the exchange of traffic.

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- i. Provide a minimum sample of 5 CLEC contracts between CenturyLink and CLECs in Washington that would be representative of the types of CLEC contracts CenturyLink has with CLECs.
- j. Provide a detailed description of "CenturyLink's Wholesale Services Group" including geographic location and headcount.
- k. Regarding the Atlantic-ACM "Best in Class" awards mentioned at lines 7-13, describe your understanding of how Atlantic-ACM collects the data used to determine award winner. A complete response will:
 - i. Provide a copy of the 2009 Metro Wholesale Carrier Report Card study from Atlantic-ACM.
 - ii. Whether the data used by Atlantic-ACM is based on wholesale or retail service quality data that CenturyLink reports to state public service commissions or the FCC, or if the data is collected from another source.
 - iii. To the extent that the award is based on a survey, indicate how many survey respondents served as the basis for the awards won by CenturyLink.
 - iv. Indicate whether the Atlantic-ACM data is weighted by the relative volume of business CenturyLink has in the wholesale market.

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.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response as of June 30, 2010:

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a. See table below

a. T o	Total	Washington
<i>Total agreements</i>	1,973	83
(i) CLEC interconnection agreements:	1,039	35
(ii) resale agreements:	566	16
(iii) commercial agreements:	122	16
(iv) traffic exchange agreements:	157	13
(v) other:	89	3

4

b. Total of 435 agreements, 25 of which are specific to Washington.

c. See tables below:

	Total	CenturyTel	EQ/United
<i>Total agreements</i>	83	25	58
(i) CLEC interconnection agreements:	35	5	30
(ii) resale agreements:	16	7	9
(iii) commercial agreements:	16	0	16
(iv) traffic exchange agreements:	13	13	0
(v) other:	3	0	3

d. See table below:

	Total	CenturyTel	EQ/United
Total agreements	1973	650	1323
Washington Only	83	25	58

e. See table below:

	Total	CenturyTel	EQ/United
Unbundled loop terms included:	916	114	802
Washington Only	30	0	30

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f. See table below:

	Total	CenturyTel	EQ/United
Collocation terms included:	1061	237	824
Washington Only	30	0	30

g. See table below:

	Total	CenturyTel	EQ/United
Resale agreements	566	265	301
Washington Only	16	7	9

h. See table below:

	Total	CenturyTel	EQ/United
Traffic exchange agreements	157	148	9
Washington Only	13	13	0

i. Agreements included:

1. BullsEye Telecom, Inc. & United Telephone Company of the Northwest d/b/a Embarq (Attachment Integra-76i(1))
2. Granite Telecommunications, LLC & United Telephone Company of the Northwest d/b/a Embarq (Attachment Integra-76i(2))
3. BullsEye Telecom, Inc. & CenturyTel of Washington, Inc. dba CenturyLink; CenturyTel of Inter Island, Inc., dba CenturyLink and CenturyTel of Cowiche, Inc. dba CenturyLink (Attachment Integra-76i(3))
4. American Fiber Network, Inc. & United Telephone Company of the Northwest dba Embarq (Attachment Integra-76i(4))
5. Comcast Phone of Washington, LLC & CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., and CenturyTel of Cowiche, Inc. (Attachment Integra-76i(5))

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- j. The Wholesale organization is designed to provide complete support to CenturyLink's wholesale customers including ordering and provisioning, billing, product support, contract negotiation, sales support and public telephone. There are currently 505 positions in the group, including open jobs and there is one employee who physically resides in Washington. Please see Attachment Integra-78a which provides a description of the functions of the organization
- k. See information below:
 - i. Please see Attachment Integra-76k.i. The information in this attachment is confidential.
 - ii. The data Atlantic-ACM uses is collected from our wholesale customers. They respond to the survey with their input on our products/offerings and services.
 - iii. Specific to the awards won by CenturyLink, 95 respondents returned the survey out of 471 individuals who received the survey.
 - iv. CenturyLink has no knowledge if Atlantic-ACM weights the data based on the relative volume of business.

Sponsor: Diane Roth, Director Contract Management; Valerie Wright, Manager Product Management - Wholesale

WUTC Docket No. UT-100820
CROSS-EXHIBIT4-JJ-JCX

REDACTED

Confidential INTERVENOR: Integra, Set 1, No. 76k.i