

**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**

129. Refer to pages 9-11 of Exhibit TS-1T. Describe in detail and provide any documentation in CenturyLink's possession on the "go-to-market" service delivery model. A complete response will: (a) indicate whether and to what extent the go-to-market model impacts wholesale customers, (b) include a description of the marketing efforts undertaken in the go-to-market model and any marketing or training documentation associated with the go-to-market model, (c) a revised map in the same form as Exhibit DR-4 reflecting the Qwest acquisition, and (d) a list and description of the "regionally-based resources and customized back-office support" used under the go-to-market model (see, Declaration of Karen Puckett, WC Docket No. 10-110).

Century Link Objections:

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's and Qwest's parent companies is consistent with the public interest. Specific information regarding the marketing strategies of CenturyLink's operating companies in Washington is competitively sensitive information and not relevant to this analysis. In addition, the information requested is highly confidential, commercially sensitive information the release of which, particularly to CenturyLink's competitors such as Integra, would cause irreparable competitive harm to CenturyLink, the impact of which would not be mitigated by the terms of the existing Protective Order.

CenturyLink Supplemental Response (8/9/10):

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

- a. CenturyLink's "go-to-market" service delivery model is geared towards retail customers. This service delivery model has no impact on wholesale customers.
- a. A map similar to that in Exhibit DR-4 reflecting the Qwest acquisition is not available.

Sponsor: John Felz, Director Regulatory Operations and Policy