

**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**

131. Refer to page 14 lines 4-7 of Exhibit JJ-1T. To the extent different than the “go-to-market” model or “neighborhood” approach, explain in detail CenturyLink’s region-based local operating model and provide any supporting documentation in CenturyLink’s possession describing the model. A complete response will explain (a) whether and to what extent that model effects (or will effect) Qwest’s wholesale customers; (b) the proof to support the statement that it has “proven successful” and (c) the “direct response marketing efforts on a market-by-market basis” that are part of this model (including any marketing/training materials developed by CenturyLink in conjunction with its direct response marketing efforts).

**CenturyLink 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 in 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 Joint CLEC, 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:

CenturyLink’s region-based local operating model is geared towards retail customers. This model has no effect on wholesale customers.

**Sponsor:** John Felz, Director Regulatory Operations and Policy