WUTC Docket No. UT-100820 Supplemental Responsive Testimony of Billy H. Pruitt Exhibit____BHP -14HCT November 1, 2010

Exhibits

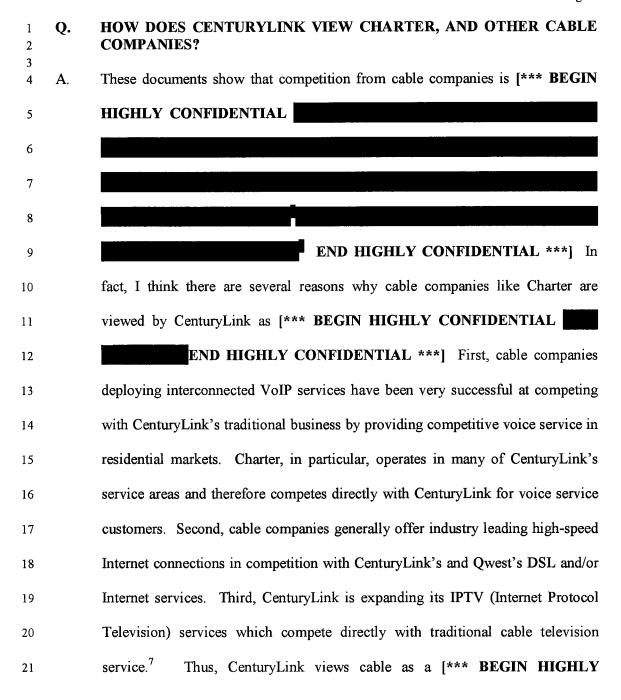
- Exhibit No.__BHP-15HC "Wholesale Diligence Update" document produced by CenturyLink in response to Integra's First Set of Information Requests, Request No. 143, and Commission Staff Request No. 13.
- Exhibit No.__BHP-16HC "Due Diligence Response No. 16" document produced by CenturyLink in response to Integra's First Set of Information Requests, Request No. 143, and Commission Staff Request No. 13.
- Exhibit No. _BHP-17HC "Operations Overview" document produced by CenturyLink in response to Integra's First Set of Information Requests, Request No. 143, and Commission Staff Request No. 13.

1		been designated as "Highly Confidential" pursuant to the ALJ's Amended
2		Protective Order in this case. As such, they are subject to "Level C" protections.
3	Q.	HAVE YOU REVIEWED THE "WHOLESALE DILIGENCE UPDATE"
4		DOCUMENT PRODUCED BY CENTURYLINK?
5		TI (STY) 1 - 1 D'II II - 1 - 2 decreant 1 was much and by
6	\mathbf{A} .	Yes. The "Wholesale Diligence Update" document was produced by
7		CenturyLink on or about October 11, 2010 in response to Integra Request No. 143
8		and Commission Staff Request No. 13. Specifically, the document is entitled
9		[*** BEGIN HIGHLY CONFIDENTIAL
10		
11		END HIGHLY CONFIDENTIAL ***] ("Wholesale
12		Diligence Update").
13	Q.	PLEASE DESCRIBE THE "WHOLESALE DILIGENCE UPDATE"
14		DOCUMENT, AND ITS RELEVANCE TO SOME OF THE ISSUES IN
15		THIS PROCEEDING.
16		THE COURT IS IN THE TAIL OF THE COURT AND COUR
17	A.	The "Wholesale Diligence Update" document [*** BEGIN HIGHLY
18		CONFIDENTIAL
19		
20		
21		END HIGHLY CONFIDENTIAL
22		***
		4

¹ See "Wholesale Diligence Update" document. Exhibit No._BHP-15HC.

1 2 3 4	Q.	HAVE YOU REVIEWED THE DOCUMENTS ENTITLED "DUE DILIGENCE RESPONSE NO. 16" AND "OPERATIONS OVERVIEW" PRODUCED BY CENTURYLINK?
5	A.	Yes. The "Due Diligence Response No. 16" and "Operations Overview"
6		documents were produced by CenturyLink on or about October 11, 2010 in
7		response to Integra Information Request No. 143 and Commission Staff Request
8		No. 13. Specifically, the documents are titled [*** BEGIN HIGHLY
9		CONFIDENTIAL
10		END
11		HIGHLY CONFIDENTIAL ***] ("Due Diligence Response No. 16"), and [***
12		BEGIN HIGHLY CONFIDENTIAL
13		
14		END HIGHLY CONFIDENTIAL***] ("Operations
15		Overview").
16 17 18	Q.	PLEASE DESCRIBE THE "DUE DILIGENCE RESPONSE NO. 16" AND "OPERATIONS OVERVIEW" DOCUMENTS, AND THEIR RELEVANCE TO SOME OF THE ISSUES IN THIS PROCEEDING.
19 20	A.	The "Due Diligence Response No. 16" and "Operations Overview" documents
21		provide insight into how CenturyLink views cable company competitors. These
22		documents reinforce the fact that CenturyLink has a strong economic incentive to
23		undermine competitors that are also wholesale customers. Charter is, of course,
24		both a wholesale customer of and competitor to Century Link

³ See "Due Diligence Response No. 16" document. Exhibit No.__BHP-16HC. ⁴ See "Operations Overview" document. Exhibit No.__BHP-17HC.



⁵ Exhibit BHP-16HC at 1.

⁶ Exhibit BHP-17HC at 6.

⁷ Direct Testimony of Mark S. Reynolds, on behalf of CenturyLink, at 4, lines 6-16, at 19, lines 8-13.