

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

QWEST CORPORATION d/b/a  
CENTURYLINK QC,

Respondent.

**CONSOLIDATED DOCKET NOS.:**  
UT-190262, UT-190263, UT-190264,  
UT-190265, and UT-190266

CENTURYLINK'S **AMENDED**  
MOTION TO WITHDRAW TARIFF  
FILING AND DISMISS  
PROCEEDING

- 1 CenturyLink hereby renews its motion to withdraw its tariff filings in the above-captioned dockets and to dismiss the proceeding. Under WAC 480-07-380(3)(b), the Commission will grant a motion to withdraw if doing so is in the public interest. CenturyLink believes that granting the motion in this instance is consistent with the public interest as CenturyLink has no current intention to cease providing the services at issue.
- 2 As such, the prime basis for the motion is administrative efficiency. The parties have been unable to agree on a transition plan for the CenturyLink companies to exit the provision of the PS/ALI services, even though there is no dispute that similar or identical services are available from at least four different competitors.
- 3 Because of the administrative burden of continuing with the proceeding, and CenturyLink's current lack of resources to fully engage with the requirements of this docket (discovery, testimony, reporting, etc.) CenturyLink will not contest the denial of its tariff filing. Litigating the case would be a waste of time and resources under the circumstances. Alternatively, CenturyLink would waive a hearing on the suspended tariff and have the Commission simply deny the filing.

4 CenturyLink is aware that the Commission denied a similar request in Order No. 03 in this proceeding. However, the basis for the motion was different, and the reasons for denying the motion do not apply in light of the changed circumstances in this case.

5 In light of the history of this case to date, CenturyLink makes the following representations:

- When the tariffs were filed, CenturyLink had 449 customers taking the PS/ALI service. CenturyLink has provided two customer notices advising customers to find another provider. The second notice, on August 9, 2019, was sent via US Mail and to nearly 800 email addresses. As of October 1, 2019, CenturyLink had 398 PS/ALI customers. As of November 1, 2019, CenturyLink had 396.
- The PS/ALI service generates a financial loss to CenturyLink.
- CenturyLink has abandoned its effort to discontinue PS/ALI service and does not at this time have a specific plan or timeline to exit the PS/ALI market.
- CenturyLink will send regular customer notices via US Mail and email to its PS/ALI customers advising that CenturyLink has abandoned its effort to discontinue PS/ALI service. The notice will provide contact information for other, competing providers of PS/ALI service and explain that should the customer desire to change PS/ALI providers, these providers and CenturyLink will cooperate to facilitate the change.
- CenturyLink will not file to withdraw the service pending the outcome of a new AFOR proceeding, which should be filed in 2020. The existing AFOR expires in January 2021 and CenturyLink will include PS/ALI in the discussions with Staff and Public Counsel around a new AFOR.
- CenturyLink will file to grandfather this service if the motion is granted, and if

grandfathering is permitted will subsequently advise new customers that CenturyLink is not accepting new customers for this service which is available from multiple competitive providers.

- CenturyLink will not file to increase prices for this service unless its third-party vendor costs increase.

6 CenturyLink respectfully requests that the Commission grant this motion in advance of the November 8, 2019 testimony deadline.

Dated this 15<sup>th</sup> day of November 2019

**QWEST CORPORATION DBA CENTURYLINK QC**

*/s/ Lisa A. Anderl*

---

Lisa A. Anderl, WSBA # 13236  
Assistant General Counsel  
CenturyLink  
1600 – 7<sup>th</sup> Ave., Room 1506  
Seattle, Washington 98191  
[Lisa.anderl@centurylink.com](mailto:Lisa.anderl@centurylink.com)  
206-345-1574