



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**

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November 22, 2019

**SENT VIA WEB PORTAL**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

Re: *WUTC v. Qwest Corp. d/b/a CenturyLink QC* (PS/ALI Complaint),  
Docket UT-190262 et al. (*Consolidated*)

Dear Mr. Johnson,

Public Counsel writes this letter to respond to the Motion to Withdraw filed by CenturyLink on November 5, 2019, and amended on November 15, 2019. CenturyLink asks for authority to withdraw its filing and states that it has “no current intention to cease providing the services at issue.” CenturyLink also stated, among other things, that it will send customer notices regarding its intent to continue the service, that it will not seek to withdraw the service prior to the outcome of its next AFOR, that it will not raise prices unless its third party costs increase, and that it would like to close the service to new customers.

Public Counsel believes clear communication to customers is required, regardless of whether CenturyLink discontinues or continues to offer PS/ALI service. One of the fundamental reasons this case is still active is that the Commission deemed it important that Staff, Public Counsel and others assist in creating a withdrawal plan, including customer communication. While the parties could not agree to a transition plan, we collectively crafted customer notices that helped undue the confusion caused by CenturyLink’s initial notices. To that end, it would be helpful for CenturyLink to provide a draft of its notice, if it is allowed to withdraw its petition, to Commission Staff, Public Counsel, and other parties for review and comment.

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To: Mark L. Johnson  
Re: Docket UT-190262  
Date: November 22, 2019  
Page 2 of 2

With the commitments listed in the amended complaint, Public Counsel does not object to withdrawal so long as parties are able to provide input on CenturyLink's customer notice.

Sincerely,

*/s/ Lisa W. Gafken*  
LISA W. GAFKEN  
Assistant Attorney General  
Public Counsel Unit  
(206) 464-6595

LWG/KMB  
Enclosures  
cc: Service List (E-mail)