

**BEFORE THE WASHINGTON STATE UTILITIES  
AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of

QWEST COMMUNICATIONS  
INTERNATIONAL INC. AND  
CENTURYTEL, INC.

For Approval of Indirect Transfer of  
Control of Qwest Corporation, Qwest  
Communications Company LLC, and  
Qwest LD Corp.

DOCKET NO. UT-100820

PETITION FOR WAIVER RELATED  
TO CONDITION 19 OF THE MERGER  
SETTLEMENT AGREEMENT

- 1 CenturyLink, Inc., and Qwest Corporation d/b/a CenturyLink QC hereby petition for waiver of certain requirements in Condition 19 of the Merger Settlement Agreement related to customer complaint handling.
- 2 Condition 19 in Appendix A to the Merger Settlement Agreement provides that “CenturyLink will retain Qwest WUTC complaint staff in Washington state for a period of no less than two years following the close of the transaction.” Waiver is sought to allow one of the WUTC-dedicated complaint handlers to be based in Portland, Oregon, instead of in the state of Washington.
- 3 Waiver is *not* sought for the second paragraph of Condition 19, which provides:
- On an ongoing basis, CenturyLink shall ensure that its executive complaint functions are sufficiently staffed with adequately trained personnel who will provide a level of service that is consistent with WAC 480-120-166, with a particular focus on punctuality of response; accessibility during the Commission operating hours; thorough investigation with complete responses; and internal communication methods to reach appropriate operations personnel to respond to and resolve consumer issues, with particular emphasis on service affecting situations.

- 4 There are currently (and were at the time the Settlement was reached) two WUTC complaint staff in Qwest's Seattle offices. In addition, Qwest employs an individual in the Portland office who is trained on and familiar with Qwest' tariffs and regulatory requirements, as well as WUTC rules and laws, and has in the past provided complaint-handling support for Washington issues.
- 5 One of Qwest's Seattle-based employees now has an opportunity to move into a different work area and different job responsibilities. Qwest believes that the best replacement candidate is the current Portland employee, who already handles Washington complaints on a back up basis.
- 6 Qwest had discussed this matter with Staff and Public Counsel. Public Counsel does not object to the waiver. Staff supports this waiver as being in the best interests of the overall process of complaint handling and response. Staff has stated that they would like to see the waiver granted on the condition that if further staffing changes (other than adding Washington-based staff) are contemplated during the two year period, that an additional waiver request will be filed. Qwest agrees to that condition.
- 7 Waiver of this provision as stated herein is consistent with spirit of Condition 19 and consistent with the public interest, and Qwest asks the Commission to grant this waiver as soon as possible.
- 8 Respectfully submitted this 24<sup>th</sup> day of August, 2011.

CENTURYLINK/QWEST



Lisa A. Anderl (WSBA # 13236)  
1600 – 7<sup>th</sup> Ave., room 1506  
Seattle, WA 98191  
[lisa.anderl@centurylink.com](mailto:lisa.anderl@centurylink.com)