BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

CENTURYLINK QC'S PETITION FOR APPROVAL OF AMENDMENTS TO THE QWEST PERFORMANCE ASSURANCE PLAN. DOCKET UT-131949

COMMISSION STAFF'S ANSWER TO CENTURYLINK QC'S PETITION FOR APPROVAL OF AMENDMENTS TO THE QWEST PERFORMANCE ASSURANCE PLAN

1

On October 15, 2013, Qwest Corporation d/b/a CenturyLink QC (CenturyLink) filed with the Commission a petition requesting that the Commission replace the existing Washington Qwest Performance Assurance Plan (PAP) and Performance Indicator Definitions (PIDs) with those that were recently negotiated between CenturyLink and several CLECs. The Colorado Public Utilities Commission has entered a written order approving a settlement containing the new PAP and PIDs, and the settling CLECs agreed that the redesigned PAP should be proposed for adoption in the 13 other CenturyLink RBOC states, including Washington.

2

In light of this situation, Staff does not oppose or object to the Commission's approving CenturyLink's petition. However, if there is opposition to CenturyLink's petition by one or more other parties, Staff agrees with CenturyLink that a technical conference should then be scheduled, at which time Staff would wish to reserve its rights to provide further comment, if necessary.

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Dated this 6th day of November, 2013.

Respectfully submitted,

ROBERT W. FERGUSON

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