



Bob Ferguson

## ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

1400 S Evergreen Park Drive SW • PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

January 30, 2017

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

RE: *In the Matter of the Notice of Transaction and Application of CenturyLink For an Order Declining to Assert Jurisdiction Over, or, in the Alternative, Expedited Approval of the Indirect Transfer of Control of Level 3 Communications, LLC, Broadwing Communications, LLC, Wiltel Communications, LLC, Global Crossing Telecommunications, Inc., Global Crossing Local Services, Inc., and Level 3 Telecom of Washington, LLC to CenturyLink, Inc.*  
Docket UT-170042

Dear Mr. King:


On January 18, CenturyLink, Inc. and Level 3 Communications, Inc. filed a "Notice of Transaction and Application for an Order Declining to Assert Jurisdiction Over, Or, In the Alternative Expedited Approval of the Indirect Transfer of Control" of Level 3 companies to CenturyLink, Inc. (the "CenturyLink Filing"). Commission Staff anticipates filing a pleading in response to this filing.

Under the Commission's procedural rules, an answer to a petition is due 20 days after the petition is filed. WAC 480-370(1)(c). Petitions are defined in the rule as "original pleadings that seek relief" from the commission. Assuming that the CenturyLink Filing is a petition, the due date for an answer to the filing is February 7. This date is one day before the prehearing conference that has now been scheduled in the docket.

Staff plans to respond to the CenturyLink Filing once a procedural schedule has been set. This way, Staff can conform its response to whatever requirements may issue from the

prehearing conference. Accordingly, Staff does not intend to waive its right to file an answer; rather, Staff seeks to support and participate in process efficiencies.

Sincerely,

A handwritten signature in cursive script, reading "Julian Beattie".

for

JENNIFER CAMERON-RULKOWSKI  
Assistant Attorney General

JCR/emd

cc: Parties