

**CenturyLink**  
1600 7th Avenue, Room 1506  
Seattle, Washington 98191  
Phone: (206) 345-1574  
Facsimile (206) 343-4040

**Lisa A. Anderl**  
Associate General Counsel  
Regulatory Law Department



October 20, 2011

*Via E-mail and  
Overnight Delivery*

Mr. David Danner, Executive Director and Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: Docket No. UT-100820 – CenturyLink’s Compliance with Merger Condition 26 b.

Dear Mr. Danner:

Merger Condition 26 b. requires:

*Within 60 days after the Transaction closes, the CenturyLink ILECs and Qwest will institute a program with the executive complaint handlers for the treatment of consumer upheld WTAP complaints, to include the following:*

- i. A root cause analysis that indicates the cause of the problem leading to the customer complaint;*
- ii. The corrective action the company has taken to remedy the underlying problem;*
- iii. An issuance of a three-month service credit to the affected customer at the current applicable WTAP, Lifeline or Link-up rate, plus any additional credits that may be due the customer.*
- iv. Upon implementation of the Lifeline credit program, CenturyLink shall provide a quarterly report that shows by month:*
  - (1) The total number of Lifeline complaints received under the program;*  
*and*
  - (2) The total number of Lifeline credits that were issued during the preceding quarter.*

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CenturyLink has complied with this condition by establishing a program with its executive complaint handlers whereby they will conduct a root cause analysis to determine the cause of the problem leading to the customer complaint; document the corrective action the company has taken to remedy the underlying problem; and issue a three-month service credit to the affected customer at the applicable rate. Attached is CenturyLink's third quarter report (confidential and redacted version) that provides monthly data regarding the total number of Lifeline complaints received under the program, root cause analyses and corrective actions taken regarding each complaint, and the total number of lifeline credits that were issued during the preceding quarter.

The electronic copy is being provided by email.

Sincerely,



Lisa A. Anderl

LAA/ldj

Enclosures

cc: Jennifer Cameron-Rulkowski  
Simon ffitc