# **CenturyLink**

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# **Mark S. Reynolds**

# Director

# Western Region Regulatory Affairs

March 1, 2012

***Via E-mail and***

***Overnight Delivery***

Mr. David Danner, Executive Director

Washington Utilities & Transportation Commission

1300 S. Evergreen Park Drive SW

P.O. Box 47250

Olympia, WA 98504-7250

Re: CenturyLink’s request for waiver of, and compliance with, Condition No. 24 to the Joint Applicants’ agreement with Commission Staff and Public Counsel, Docket UT-100820, Order 14, Appendix C

Dear Mr. Danner,

CenturyLink hereby files its petition for a one time waiver of the 90 day notice, and its compliance report in connection with Condition No. 24 in the Docket UT-100820 merger settlement agreement between CenturyLink, Commission Staff and Public Counsel, adopted by the Commission in its Order 14 in this docket. Condition 24 requires the Company to provide advance notice to the Commission of the rearrangement of major network components, including engineering changes to customer call centers:

1. **Network Integration**

*After the Transaction closes, until such time as an AFOR proceeding for the CenturyLink ILECs and Qwest has concluded, CenturyLink will provide Commission Staff and Public Counsel with 90 days’ advanced notice of the rearrangement of major network components. The notice will include a rearrangement plan discussing the changes that will be made and the timeframes in which the work will be completed. Major network components include:*

1. *Customer call centers*
2. *Customer repair centers*
3. *E911 systems*
4. *Maintenance systems that monitor central office and transport systems*
5. *Engineering systems*
6. *Outside plant record systems*

CenturyLink provides Attachment 1, which provides the required information on upcoming changes involving a customer call center in Gig Harbor, Washington.

If you have any questions regarding this, please don’t hesitate to call me.

Sincerely,

Mark Reynolds

MSR/ldj

cc: Jennifer Cameron-Rulkowski

Simon ffitch