

BEFORE THE WASHINGTON 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 UT-100820

COMMISSION STAFF'S MOTION
FOR EXTENSION OF TIME TO
RESPOND TO CENTURYLINK'S
PETITION TO RELEASE
ESCROWED FUNDS AND
ELIMINATE FUTURE ESCROW
PAYMENTS

1 In response to the Commission's Notice of Opportunity to Respond issued April 3, 2012, Staff of the Washington Utilities and Transportation Commission (Staff) requests an extension of time until May 7, 2012, to file a response. Staff has consulted with CenturyLink, and the company does not object to Staff's request for extension.

2 On March 30, 2012, CenturyLink filed a Petition for Release of Funds from Broadband Escrow Account and Elimination of Requirements for Future Escrow Payments (Escrow Petition). Attached to the Escrow Petition in support of CenturyLink's escrow disbursement request is CenturyLink's highly confidential 2011 Annual Broadband Investment Report (2011 Report), which lists broadband investment projects by wire center and provides information on the number of living units that now have access to broadband or now can receive service at higher speeds as a result of the investment. The petition raises two issues: (1) whether the \$30 million broadband investment described in the Escrow Petition and the 2011 Report complies with Order 14, and (2) whether Order 14 should be modified to release CenturyLink from the obligation to escrow the remaining \$50 million of its broadband commitment.

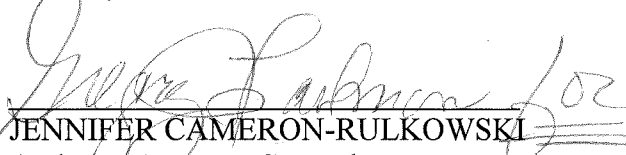
3 Staff has reviewed the 2011 Report but has not had sufficient time to review the data and documents used to generate the report. Staff has been in contact with CenturyLink and currently is in the process of working with CenturyLink to review some of this underlying information. Staff requires additional time to complete its review before commenting on whether CenturyLink's broadband investments meet the criteria of Order 14 for release of escrow funds.

4 Because Staff has not yet been able to complete its review of the 2011 Report, it seems premature for Staff to take a position on modifying Order 14 to permanently eliminate the escrow requirement. CenturyLink's Escrow Petition represents CenturyLink's first escrow reimbursement request and also Staff's first opportunity to evaluate CenturyLink's actual broadband investment vis-à-vis CenturyLink's broadband commitments and projections. Staff is mindful that the next reimbursement installment is due May 31, 2012. Accordingly, Staff is requesting extension only until May 7 to respond to CenturyLink's Escrow Petition. This is a compressed review period; however, if CenturyLink supports Staff's efforts, as it currently is doing, by promptly making documents available for Staff's review, Staff expects to be able to file a response on May 7th.

DATED this 13th day of April, 2012.

Respectfully submitted,

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Attorney General


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Assistant Attorney General
Counsel for Washington Utilities and
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