

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	Docket No. UT-130477
)	
THE CENTURYLINK COMPANIES –)	DECLARATION OF RHONDA S.
QWEST CORPORATION; CENTURYTEL OF)	BORGMAN IN OPPOSITION TO
WASHINGTON; CENTURYTEL OF)	CENTURYLINK’S MOTION TO
INTERISLAND; CENTURYTEL OF)	DISMISS SPRINT AS AN INTERVENOR
COWICHE; AND UNITED TELEPHONE)	IN THIS DOCKET
COMPANY OF THE NORTHWEST)	
)	
To be Regulated Under an Alternative Form of)	
Regulation Pursuant to RCW 80.36.135.)	

I, Rhonda S. Borgman, declare as follows:

1. I am the Manager – Switched Access for Sprint United Management Company. My business address is 6240 Sprint Parkway, Overland Park, KS 66251. I have personal knowledge of the facts stated herein and if called to testify, could and would do so truthfully.

2. In approximately June of 2012, I participated in discussions with CenturyLink and Qwest about increasing the business relationship between Sprint and CenturyLink. At that time I stated that Sprint wanted to establish a carrier-to-carrier IP interconnection arrangement between the two companies. I worked with Barb Rion of CenturyLink to gather some preliminary data regarding our respective companies’ Operating Company Numbers and long distance and local traffic volumes.

3. In September 2012, I sent Sprint’s standard IP interconnection template to CenturyLink to let them know what sort of legal arrangement Sprint was interested in pursuing.

4. In October 2012, my boss Rick Ratliff – Director Switched Access was scheduled to meet with CenturyLink at a trade show to discuss IP interconnection but the meeting was cancelled.

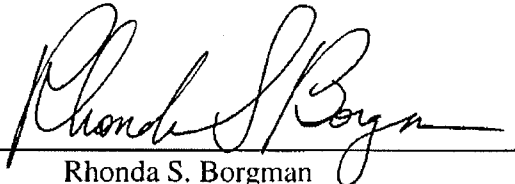
5. In November 2012, Barb Rion contacted me to state that IP interconnection discussions had stalled on CenturyLink's side but she said that she was trying to get discussions going again.

6. In March 2013, Rick met with CenturyLink at the CompTel trade show and discussed, again, Sprint's interest in negotiating IP interconnection. I followed up with Barb Rion after the show and she told me that CenturyLink did not want to use the Sprint contract template but wanted to use a CenturyLink contract. I provided her with new traffic volumes that would need to be considered in any IP interconnection discussions.

7. Barb Rion never sent me any proposed CenturyLink IP interconnection agreement or any agreement whatsoever. I contacted her again in June 2013. Barb said that she was still interested in discussing IP interconnection but she could not produce a finalized proposed contract yet. We provided her with our local and long distance minutes of use for her interconnection analysis.

8. I then sent Barb Rion a note on July 10, 2013 following up on our June discussion. She sent CenturyLink's updated traffic profile for a more recent month, but was still not able to produce the contract.

I declare under penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct to the best of my knowledge.


Rhonda S. Borgman