



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

August 14, 2013

*Via E-mail and Overnight Mail*

Mr. Steven King, 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-130477**

Dear Mr. King:

Pursuant to the August 13, 2013 ruling on CenturyLink's Motion to Dismiss Sprint as Intervenor, attached for filing are an original and 4 copies of the Declaration of William R. Easton in Support of CenturyLink's Motion to Dismiss Sprint as an Intervenor in this Docket.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa A. Anderl".

Lisa A. Anderl

LAA/jga

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**  
**Docket No. UT-130477**

**CenturyLink's Petition for AFOR**

I certify that I have served copies of the Affidavit of William R. Easton in Support of CenturyLink's Motion to Dismiss Sprint as an Intervenor in this Docket via email and UPS delivery on the following parties:

<p>Lisa Gafken Office of the Attorney General 800 Fifth Avenue, Suite 2000 Seattle, WA 98104-3188 Email: <a href="mailto:lisaw4@atg.wa.gov">lisaw4@atg.wa.gov</a></p>	<p>Simon ffitc Public Counsel Section Office of the Attorney General 800 Fifth Avenue, Suite 2000 Seattle, WA 98104-3188 Email: <a href="mailto:simonf@atg.wa.gov">simonf@atg.wa.gov</a></p>
<p>Judith A. Endejan Graham &amp; Dunn PC 2801 Alaskan Way Ste 300 Seattle, WA 98121-1128 Email: <a href="mailto:jendejan@grahamdunn.com">jendejan@grahamdunn.com</a></p>	<p>Jennifer Cameron-Rulkowski Assistant Attorney General 1400 S Evergreen Park Dr SW P.O. Box 40128 Olympia, WA 98504-0128 Email: <a href="mailto:jcameron@utc.wa.gov">jcameron@utc.wa.gov</a></p>
<p>Douglas Denney Vice President, Costs &amp; Policy Integra Telecom 1201 NE Lloyd Blvd, Suite 500 Portland, OR 97232 Email: <a href="mailto:dkdenney@integratelecom.com">dkdenney@integratelecom.com</a></p>	<p>Kyle J. Smith General Attorney Regulatory Law Office U.S. Army Legal Services Agency 9275 Gunston Road Fort Belvoir, VA 22060-5546 Email: <a href="mailto:kyle.j.smith124.civ@mail.mil">kyle.j.smith124.civ@mail.mil</a></p>

DATED this 14th day of August 2013.

  
\_\_\_\_\_  
Josie Addington

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

THE CENTURYLINK COMPANIES – QWEST CORPORATION; CENTURYTEL OF WASHINGTON; CENTURYTEL OF INTERISLAND; CENTURYTEL OF COWICHE; AND UNITED TELEPHONE COMPANY OF THE NORTHWEST

To be Regulated Under an Alternative Form of Regulation Pursuant to RCW 80.36.135.

Docket No. UT-130477

DECLARATION OF WILLIAM R. EASTON IN SUPPORT OF CENTURYLINK'S MOTION TO DISMISS SPRINT AS AN INTERVENOR IN THIS DOCKET

I, William R. Easton, declare as follows:

- 1 I am a Wholesale Staff Director at CenturyLink Inc. My business address is 1600 7<sup>th</sup> Ave., Seattle, WA 98191. In my role as Wholesale Staff Director, I am familiar with CenturyLink's wholesale product offerings and the issues raised by Sprint.
- 2 The CenturyLink ILECs currently do not have IP capabilities within the local network, as the local network is based on TDM (Time Division Multiplexing) switches which are not capable of handling Voice Over Internet Protocol (VoIP) traffic. Therefore any VoIP product offerings are made through the CLEC/IXC affiliate, Qwest Communications Company, LLC (QCC). These QCC offerings include:
  - VoIP Termination;
  - SIP Trunking; and
  - IP Traffic Exchange

- 3 VoIP Termination – since 2004 QCC has offered VoIP termination service for long distance and toll free traffic using the QCC’s nation-wide network. VoIP Termination service is offered via an amendment to a Wholesale Service Agreement. Sprint already has a Wholesale Service Agreement with QCC.
- 4 SIP Trunking (Session Initiated Protocol Trunking) – QCC is currently beta testing a new SIP Trunking product offering. This nationwide local interconnection service allows for the delivery of originating and terminating local voice VoIP traffic, and optionally, LD VoIP traffic using QCC’s softswitch and nationwide network, which offers access to approximately 9,000 rate centers. The service is currently in beta testing with plans to make it available to carriers in September 2013. SIP Trunking will be offered as an amendment to the QCC Wholesale Services agreement. Rates for the SIP Trunking service will be market based. A draft copy of the SIP Trunking amendment was provided in response to Sprint data request no. 22.
- 5 IP Traffic Exchange – QCC is also developing an IP traffic exchange product which will allow for the exchange on non-local IP traffic on a bill and keep basis. QCC plans to make the agreement available to carriers in October 2013 via an amendment to the Wholesale Services Agreement.
- 6 All of the above QCC product offerings are either available to Sprint, or will be when they are made available to all carriers. Sprint can avail itself of these offerings by executing amendments to its existing Wholesale Services Agreement.
- 7 Although Sprint has not been a part of the SIP Trunking beta test, as Sprint’s Ms. Borgman noted in her declaration, Sprint and CenturyLink have been involved in discussions involving an IP Traffic exchange agreement. Sprint has supplied CenturyLink with information regarding traffic volumes and proposed language for VoIP traffic exchange agreement. CenturyLink is using the proposed Sprint language along with language from other customers to develop the IP Traffic Exchange offering which will be made available in October 2013.

8 To the extent Ms. Borgman is implying that CenturyLink is ignoring carriers' desires for VoIP interconnection, she is mistaken. CenturyLink is taking input from VoIP customers, including Sprint, and actively developing products which will meet their needs. To the extent that Sprint's issue concerns whether IP-to-IP interconnection is to be priced at market based rates as opposed to Total Element Long Run Incremental Costs (TELRIC) rates, the question of whether this is a 251 obligation under the Telecommunications Act has not yet been decided by the FCC.

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

DATED this 12th day of August, 2013 at Seattle, Washington.

  
WILLIAM R. EASTON