**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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| 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 7th 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