

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

|   |   |                                |
|---|---|--------------------------------|
| In the Matter of the Joint Application of       | ) | Docket No. UT-100820           |
|   | ) |                                |
| QWEST COMMUNICATIONS                            | ) | SPRINT NEXTEL CORPORATION'S    |
| INTERNATIONAL INC. AND                          | ) | SUPPORT OF PETITION FOR WAIVER |
| CENTURYTEL, INC.                                | ) | AND/OR MODIFICATION OF MERGER- |
|   | ) | RELATED CONDITIONS REGARDING   |
| For Approval of Indirect Transfer of control of | ) | AFOR FILINGS                   |
| Qwest Corporation, Qwest Communications         | ) |                                |
| Company LLC, and Qwest LD Corp.                 | ) |                                |
|   | ) |                                |
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|   | ) |                                |

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- 1 Sprint Nextel corporation ("Sprint") was a party in this docket which reviewed and approved the merger of Qwest Communications and CenturyTel, Inc. ("CenturyLink"). Sprint provided testimony that advocated for access rate reform, which was partially accomplished in Order 14 in which the Commission ordered the CenturyTel intrastate access rates to be reduced to Qwest's interstate access rate. The Commission deferred further access rate reductions to future proceedings, anticipating that these would be addressed as a result of CenturyLink's AFOR filing to be made in 2014.<sup>1</sup>
  
- 2 Sprint agrees with CenturyLink that it should be allowed to file its AFOR petition as soon as possible, earlier than 2014. Therefore, Sprint supports CenturyLink's Petition for Waiver of the merger condition that delays the AFOR filing until 2014. Much has changed in the

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<sup>1</sup> Order 14, ¶¶ 219-220.

regulatory and competitive landscape since Order 14 was issued. The public interest would be served by opening an AFOR proceeding as soon as possible to examine necessary access charge reform in a comprehensive proceeding, in which Sprint will petition to intervene as an interested party.

- 3 Sprint thanks the Commission for the opportunity to comment on CenturyLink's petition, which should be granted.

RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of November, 2012.

GRAHAM & DUNN PC

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