**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  **NARRATIVE IN SUPPORT OF SETTLEMENT AGREEMENT** |

*1* The petitioning CenturyLink companies (“CenturyLink”) and the U.S. Department of Defense and All Other Federal Executive Agencies (“DoD/FEA”) (collectively “Parties or individually a “Party”) hereby file this Narrative in Support of Settlement Agreement pursuant to WAC 480-07-730 and 480-07-740. The Parties are also filing their Settlement Agreement and request that it be approved and adopted by the Washington Utilities and Transportation Commission (the “Commission”) in resolution of the disputed issues between them in this docket.

*2* Pursuant to the terms of the Settlement Agreement filed contemporaneously with this Narrative, the Parties request that the Commission approve the Settlement Agreement, and approve the AFOR as being consistent with the public interest (conditioned upon the approval of the Settlement Agreement).

*3* The Settlement Agreement, based upon a volume term arrangement: (1) provides for a period of rate stability for certain services purchased by the DoD/FEA; and (2) requires the DoD/FEA to maintain certain volume commitments in order to receive the benefits of the rate stability provisions.

*4* The terms of the Settlement Agreement satisfy DoD/FEA’s interests and concerns as stated in DoD/FEA’s petition to intervene. These terms are consistent with the public interest and provide the DoD/FEA with assurances that the AFOR is in the public interest.

*5* CenturyLink’s interests are satisfied in that the Settlement Agreement will aid in the timely and orderly regulatory review and approval of the AFOR. The Settlement Agreement provides CenturyLink with some level of certainty with regard to the purchase of services by a very large customer. Settlement with the DoD/FEA also minimizes risks and uncertainty associated with litigation in this matter and is beneficial to all Parties for that reason as well.

*6* The Parties offer, pursuant to WAC 480-07-740(2)(b), to present one or more witnesses to testify in support of the Settlement Agreement and answer questions concerning the Agreement’s details. Counsel for the Parties will also make themselves available as necessary to address any legal matters associated with the Settlement Agreement and to respond to any questions from the bench.

Dated this day of

|  |  |
| --- | --- |
| **CenturyLink**    Lisa A. Anderl (WSBA #13236)  CenturyLink  1600 7th Avenue, Room 1506  Seattle, Washington 98191  [Lisa.anderl@centurylink.com](mailto:Lisa.anderl@centurylink.com) | **DoD/FEA**    Kyle J. Smith  Regulatory Law Office (JALS-RL)  U.S. Army Legal Services Agency  9275 Gunston Road  Fort Belvoir, Virginia 22060-5546  [kyle.j.smith124.civ@mail.mil](mailto:kyle.j.smith124.civ@mail.mil) |