

**CENTURYLINK**  
1600 7th Avenue, Room 1506  
Seattle, Washington 98191  
(206) 345-1574  
Facsimile (206) 343-4040

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



September 19, 2013

*Via Email and  
Overnight delivery*

Mr. Steven V. 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 – Petition for AFOR  
Settlement Agreement of CenturyLink and Sprint**

Dear Mr. King:

Enclosed please find an original and four (4) copies of CenturyLink's Narrative in Support of Settlement Agreement with Sprint.

The electronic copy is being provided by e-mail.

Sincerely,

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

Lisa A. Anderl

LAA/jga  
Enclosures  
cc: Service List

**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

CENTURYLINK'S NARRATIVE IN  
SUPPORT OF SETTLEMENT  
AGREEMENT WITH SPRINT


- 1 The petitioning CenturyLink companies ("CenturyLink") hereby file this Narrative in Support of Settlement Agreement pursuant to WAC 480-07-730 and 480-07-740. CenturyLink and Sprint previously filed 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 previously in this docket, CenturyLink requests that the Commission approve the Settlement, and approve the AFOR as being consistent with the public interest.
- 3 The Settlement Agreement provides that Sprint will withdraw from the proceeding, and CenturyLink will not oppose an informal Commission proceeding such as an educational

workshop on the issue of IP-to-IP interconnection. CenturyLink reserves its rights in terms of what its advocacy in such a proceeding might be.

- 4 CenturyLink believes that the terms of the Agreement satisfy Sprint's interests and concerns as stated in its petition to intervene, as Sprint is now free to ask the Commission to inquire into the issue of IP-to-IP interconnection, within the scope of the settlement agreement.
- 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 without delay. Settlement with Sprint also minimizes risks and uncertainty associated with litigation in this matter and is beneficial to all Parties for that reason as well.
- 6 CenturyLink offers, 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 Agreement and to respond to any questions from the bench.

Dated this 19<sup>th</sup> day of September, 2013

CENTURYLINK



Lisa A. Anderl (WSBA #13236)  
1600 7th Avenue, Room 1506  
Seattle, Washington 98191  
[Lisa.anderl@centurylink.com](mailto:Lisa.anderl@centurylink.com)

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

**CenturyLink's Petition for AFOR**

I certify that I caused to be served copies of the CenturyLink's Narrative in Support of Settlement Agreement with Sprint 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 19<sup>th</sup> day of September 2013.

  
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Josie Addington