

CENTURYLINK
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August 4, 2014

*Via Email and
Overnight delivery*

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-100820
CenturyLink's Compliance with Merger Condition 26 b.**

Dear Mr. King:

Merger Condition 26 b. requires:

Within 60 days after the Transaction closes, the CenturyLink ILECs and Qwest will institute a program with the executive complaint handlers for the treatment of consumer upheld WTAP complaints, to include the following:

- i. A root cause analysis that indicates the cause of the problem leading to the customer complaint;*
- ii. The corrective action the company has taken to remedy the underlying problem;*
- iii. An issuance of a three-month service credit to the affected customer at the current applicable WTAP, Lifeline or Link-up rate, plus any additional credits that may be due the customer.*
- iv. Upon implementation of the Lifeline credit program, CenturyLink shall provide a quarterly report that shows by month:*

Mr. Steven King, Executive Director & Secretary
Washington Utilities & Transportation Commission
August 4, 2014
Page 2

- (1) *The total number of Lifeline complaints received under the program; and*
- (2) *The total number of Lifeline credits that were issued during the preceding quarter.*

CenturyLink has complied with this condition by establishing a program with its executive complaint handlers whereby they will conduct a root cause analysis to determine the cause of the problem leading to the customer complaint; document the corrective action the company has taken to remedy the underlying problem; and issue a three-month service credit to the affected customer at the applicable rate. Enclosed are an original and nine copies of CenturyLink's second quarter report (confidential and redacted versions) that provides monthly data regarding the total number of Lifeline complaints received under the program, root cause analyses and corrective actions taken regarding each complaint, and the total number of lifeline credits that were issued during the preceding quarter. The report is confidential under the Protective Order in this docket.

The electronic copy is being provided by email.

Sincerely,



Lisa A. Anderl

LAA/jga

Enclosures

cc: Jennifer Cameron-Rulkowski
Lisa Gafken