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Mark S. Reynolds
Northwest Region Vice President
Public Policy

January 16, 2015

*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 UT-100820, Order 14, Appendix A
CenturyLink's compliance with Condition No. 22 to the Joint
Applicants' agreement with Commission Staff and Public
Counsel**

Dear Mr. King,

Condition No. 22 in the Docket UT-100820 merger settlement agreement between CenturyLink, Commission Staff and Public Counsel, adopted by the Commission in its Order 14 in the docket, requires CenturyLink to submit a semi-annual retail OSS integration status report.

22. OSS - Retail

CenturyLink agrees to submit to Commission Staff and Public Counsel semi-annual integration status reports following the close of the Transaction. The initial report will be submitted within 90 days after the Transaction closes and will continue semi-annually for four years (reports will be provided within 30 days following the end of each semi-annual period). At a minimum, the reports will include a summary of integration-related activity completed since the last filed report and key milestones, deliverables and implementation timelines, and major risks and contingency plans for the upcoming quarter and beyond, if available, for all substantial integration team efforts.

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Attachment 1 provides the semi-annual status report which contains the required information on CenturyLink's integration of retail OSS. This is the eighth and final semi-annual report which completes the requirements of this condition (i.e. semi-annual reports for four years).

If you have any questions regarding this report, please don't hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Reynolds", with a stylized flourish at the end.

Mark Reynolds

MSR/jga

Enclosure

cc: Jennifer Cameron-Rulkowski
Lisa Gafken

**Washington Semi-Annual Report
Retail OSS Integration Status
CenturyLink/Qwest Merger
Docket UT-100820 – Order No. 14, Appendix A to Settlement Agreement, Condition 22
January 16, 2015**

Background

The first paragraph of Condition 22 of the settlement agreement between CenturyLink/Qwest, the WUTC Staff and the Public Counsel, approved by the Commission in Order 14 in Docket UT100820, requires CenturyLink to submit a semi-annual retail OSS integration status report. The full text of the condition is stated below:

22. OSS – Retail

CenturyLink agrees to submit to Commission Staff and Public Counsel semi-annual integration status reports following the close of the Transaction. The initial report will be submitted within 90 days after the Transaction closes and will continue semi-annually for four years (reports will be provided within 30 days following the end of each semi-annual period). At a minimum, the reports will include a summary of integration-related activity completed since the last filed report and key milestones, deliverables and implementation timelines, and major risks and contingency plans for the upcoming quarter and beyond, if available, for all substantial integration team efforts.

In compliance with this condition, CenturyLink hereby provides its semi-annual status report concerning integration of retail OSS.

Retail OSS Integration Status

CenturyLink's Integration Management Office is leading the analysis and implementation phases of Systems Integration for the Qwest merger. Pursuant to CenturyLink's ongoing system review process, no additional system selection decisions for retail customer facing Operations Support Systems ("OSS") were made during this reporting period. A summary of integration activity completed since the last report is below.

Network Inventory Systems: CenturyLink continues to progress in its implementation of the previously reported transport network inventory consolidation project. The initial phase of the transport network inventory systems conversion encompasses the replacement of the legacy CenturyLink inventory systems with the legacy Qwest TIRKS systems. The conversion for the Washington legacy CenturyLink companies was successfully completed in October 2014.