

**CENTURYLINK**  
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**Mark S. Reynolds**  
Northwest Region Vice President  
Public Policy

April 30, 2015

*Via Web Portal 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. 23 (OSS –  
Wholesale) to the Joint Applicants' Agreement with  
Commission Staff and Public Counsel**

Dear Mr. King,

Please find enclosed an original and nine (9) copies of CenturyLink's compliance filing as discussed and described below.

CenturyLink has made the decision to consolidate the Wholesale Operational Support Systems associated with the Access Service Request (ASR) ordering and billing functions. CenturyLink plans to consolidate the current Legacy Qwest ordering and billing systems for ASRs into the existing Legacy CenturyLink systems. The ordering consolidation will convert from the CenturyLink Online Request Application (CORA) to EASE and the billing consolidation will convert from Integrated Access Billing System (IABS) to the Communications Data Group (CDG) Carrier Access Billing System (CABS). The conversion is anticipated in mid-year 2016.

CenturyLink has notified affected Wholesale customers and has begun meeting the requirements of the Change Management Process (CMP) detailed in CenturyLink's Interconnection Agreements as well as merger-related settlement agreements. Most recently, CenturyLink filed a detailed OSS System Consolidation Plan on April 29, 2015 in the Change Management Process forum where carriers will be able to review the plan and provide comments.

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In compliance with CenturyLink's commitments made in the FCC's proceeding regarding the transfer of control of Qwest Communications International Inc. to CenturyLink<sup>1</sup>, CenturyLink is notifying the Commission and providing a copy of the detailed OSS integration plan. Pursuant to the requirements of Condition No. 23 (OSS – Wholesale) 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, CenturyLink provides notice to the Commission of its planned Wholesale OSS consolidation for Qwest Corporation and is providing a copy of the detailed OSS System Consolidation Plan which consists of two (2) documents: the CenturyLink Access Service Ordering and Billing System Consolidation Plan and an Appendix A.

The CMP provides all affected carriers the opportunity to provide comments, employs third party testing, and will ultimately lead to implementation in mid-2016 after a vote of acceptance. CenturyLink would be happy to provide additional information about the CMP forum and how the Commission can participate or track the progress of this systems consolidation.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Mark S. Reynolds

MSR/jga

Enclosures

cc: Service List

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<sup>1</sup> WC Docket No. 10-110, Appendix C, released March 18, 2011.