



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • www.utc.wa.gov

June 15, 2015

NOTICE OF OPPORTUNITY TO RESPOND
(Responses due by Monday, June 22, 2015)

RE: *In the Matter of the Joint Application of Qwest Communications International Inc., and CenturyTel, Inc., for Approval of Indirect Transfer of Control of Qwest Corporation, Qwest Communications Company LLC, and Qwest LD Corp., Docket UT-100820*

TO ALL PARTIES:

On March 14, 2011, the Washington Utilities and Transportation Commission (Commission) entered a final order, Order 14, in Docket UT-100820. The Commission, in Order 14, imposed several additional conditions on the approval of the merger between Qwest Communications International, Inc. (Qwest) and CenturyTel, Inc. (CenturyLink). Specifically, in paragraphs 120 and 121 of Order 14, the Commission ordered the combined company to file a detailed report on the competitive local exchange carrier (CLEC) acceptance process for the Qwest Operations Support Systems (OSS) replacement, after acceptance testing and controlled production but not later than 60 days prior to the OSS replacement.¹ Order 14 also provided for a possible Commission-imposed third-party testing of the OSS replacement prior to implementation if necessary.²

On April 30, 2015, the Commission received a compliance filing detailing CenturyLink's decision to consolidate the Wholesale OSS associated with the Access Service Request (ASR) ordering and billing functions. Specifically, CenturyLink stated it plans to:

¹ Order 14, ¶ 120 (March 14, 2011).

² *Id.*, ¶ 121.

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 2016.³

CenturyLink began notifying CLECs and meeting the Change Management Process (CMP) contained within the CLEC interconnection agreements.⁴

On May 7, 2015, CenturyLink filed a Petition for Waiver of Merger-Related Conditions Regarding OSS Issues (Waiver Petition). The Waiver Petition requests that the Commission allow CenturyLink to use the CMP to accomplish the OSS replacement, instead of the additional conditions referenced in paragraphs 120 and 121 of Order 14. CenturyLink argues that the additional conditions “would not enhance the process, but rather would simply add time to the end of the process, delaying implementation of a proven industry standard OSS that is already being used by the companies that operate in CenturyLink’s other markets.”⁵

NOTICE IS HEREBY GIVEN That parties who wish to respond to CenturyLink’s Waiver Petition must do so by 5:00 p.m., Monday, June 22, 2015.

MARGUERITE E. FRIEDLANDER
Administrative Law Judge

³ CenturyLink Compliance Cover Letter, filed April 30, 2015, at 1.

⁴ *Id.* at 2.

⁵ Waiver Petition, ¶ 8.