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June 22, 2015

Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

RE: *Joint Application of Qwest Communications International, Inc. and CenturyTel, Inc.
for Approval of Indirect Transfer of Control*
Docket UT-100820

Dear Mr. King:

Enclosed for filing in the above-referenced docket are the original and 12 copies of Commission Staff's Response to CenturyLink's Petition for Waiver, and Certificate of Service.

Sincerely,

JENNIFER CAMERON-RULKOWSKI
Assistant Attorney General

JCR/emd
Enclosures
cc: Parties w/enc.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

COMMISSION STAFF'S
RESPONSE TO CENTURYLINK'S
PETITION FOR WAIVER

1 Staff of the Washington Utilities and Transportation Commission (Staff) has reviewed CenturyLink's Petition for Waiver of Merger-Related Conditions Regarding OSS Issues (Petition). These conditions involve (1) additional reporting to the Commission on replacement Operational Support Systems (OSS) prior to the planned replacement, and (2) potentially imposing third-party testing of the replacement OSS. The OSS conversions involve wholesale access ordering and billing systems.

2 It is Commission Staff's understanding that affected competitive local exchange carriers (CLECs) have been notified of the planned OSS replacements through the Change Management Process. Moreover, based on CenturyLink's representations in its Petition at paragraph 5, and on Staff's informal communications with the CLEC community, Staff is not aware, to date, of any specific CLEC concerns associated with waiving these two conditions for these particular OSS replacements.

3

Staff believes that the CLECs are in the best position to determine whether they require the protections of these two conditions in the upcoming ordering and billing systems conversions. Accordingly, Staff is relying on the CLECs to identify and articulate any areas in which a waiver of these conditions might conflict with the CLECs' business needs.

DATED this 22nd day of June, 2015.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General



JENNIFER CAMERON-RULKOWSKI
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

Docket UT-100820
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached Commission Staff Response to CenturyLink's Petition for Waiver upon the persons and entities listed on the Service List below by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Olympia, Washington this 22nd day of June, 2015.



ELIZABETH M. DeMARCO

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For Level 3 Communications, et al.

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