BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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| In the Matter of the Joint Application ofQWEST 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-100820COMMISSION 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

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