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December 30, 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: *Washington Utilities and Transp. Comm'n v. Qwest Corp. d/b/a CenturyLink QC*
Docket UT-140597

Dear Mr. King:

Enclosed for filing in the above-referenced docket are the original and four copies of Commission Staff's Response to Motion for Opportunity to File Closing Brief, and Certificate of Service.

Sincerely,



SALLY BROWN

Senior Assistant Attorney General

SGB:emd

cc: Parties w/enc.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

QWEST CORPORATION d/b/a
CENTURYLINK QC,

Respondent.

DOCKET UT-140597

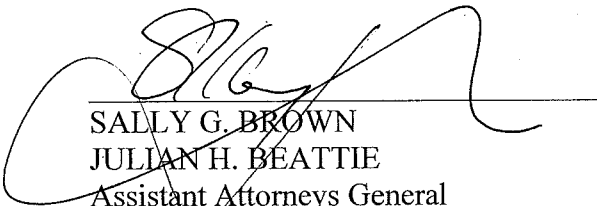
COMMISSION STAFF'S RESPONSE
OPPOSING PUBLIC COUNSEL'S
MOTION FOR OPPORTUNITY TO
FILE CLOSING BRIEF

1 In its motion filed today, Public Counsel asked the Commission to require post-
hearing briefs from the parties. Public Counsel proposes a deadline of January 29, 2016.

2 Commission Staff opposes Public Counsel's request because briefs are unnecessary
in this case. The facts are undisputed and CenturyLink has admitted liability. The sole
remaining issue is the penalty amount, and the parties' theories on this issue have been
thoroughly explained and defended through pre-filed testimony.

3 The final decision is a matter addressed to the Commission's sound discretion.
Briefing will only serve to delay the Commission's decision. The Commission should deny
Public Counsel's motion.

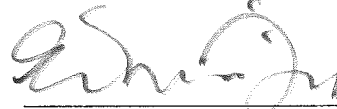
DATED December 30, 2015.


SALLY G. BROWN
JULIAN H. BEATTIE
Assistant Attorneys General
Attorneys for Commission Staff

Docket UT-140597
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached Response to Motion 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 30th day of December 2015.



ELIZABETH M. DeMARCO

For CenturyLink:

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