VIA ELECTRONIC FILING

Mr. David Danner, Executive Secretary
WASHINGTON UTILTITIES AND TRANSPORTATION COMMISSION
P.O. Box 47250
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Dear Mr. Danner:

In compliance with condition 11 – Milestone Reporting, approved by the Commission in the CenturyTel-Embarq Merger, Docket No. UT-082119, CenturyLink hereby provides advance written notice of the conversion from Embarq's PeopleSoft System to CenturyTel's SAP application solution platform. CenturyLink plans to complete this system conversion in October 2009.

CenturyLink's SAP system is an integrated application software that links business information and processes across workstreams. SAP will be used by CenturyLink for Finance, Human Resources, Payroll, Materials Management, Project Systems and Business Intelligence Reporting.

While this system conversion has no direct impact on customer affecting systems, it does involve engineering systems and outside plant record systems contemplated in the merger condition addressing Milestone Reporting. Specifically, the conversion to SAP includes engineering project systems used to plan, create, execute and track inside and outside plant for capital construction investments. Further, the conversion to SAP includes the materials management functions of material supplier sourcing, order placement through requisition and purchase order, payment settlement and reconciliation for the purpose of supplying materials for projects.

CenturyLink has completed comprehensive training for impacted employees and anticipates a smooth conversion to the new systems. Please contact me if you have any questions regarding this matter.

Sincerely,

Mary Taylor Regulatory Government Relations Manager