CenturyLink Major System Conversion Advance Notice In Compliance with CenturyTel/Embarq Merger Condition 11

Background

Condition 11 of the settlement agreement between CenturyTel/Embarq, the WUTC Staff and the Public Counsel, approved by the Commission in Order 05 in Docket 08-2119, requires advance notification to the Commission Staff and Public Counsel of major system conversions impacting Washington customers. The full text of the condition is stated below:

11. Milestone Reporting

CenturyTel and Embarq agree to provide the Staff and Public Counsel with advance written notice of major system conversions impacting Washington customers and will work with Staff to identify these major conversions. Those major systems will include, but not necessarily be limited to, business office and trouble reporting call centers, maintenance systems that monitor central office and transport equipment, engineering systems, outside plant record systems, and billing systems.

In compliance with this condition, CenturyLink hereby provides written advance notification of an upcoming system conversion impacting the company's Washington operations.

Wholesale System Conversion

CenturyLink plans to convert the wholesale access billing system for the former Embarq operating areas to the legacy CenturyTel Carrier Access Billing System (CABS). The conversion is expected to be completed in September 2011. CenturyLink sent the attached notice (Attachment A) of the planned conversion to its impacted Wholesale customers in July.

CABS performs the billing and associated functions for the following services: switched and special access, collocation, facility space and tower leases and interconnection services.

Announcement Date: Effective Date: Notification Number: Notification Category: Target Audience: Subject: July 6,2011 September 2011 SYST.CTLL.07.06.11_CABS_Bill_SYST_CONV System/Billing Notification CenturyLink CLECs, Wireless, IXCs and ILECs CenturyLink CABS Billing System Conversion

CenturyLink is converting the legacy EMBARQ CASS billing system to the legacy CenturyTel Carrier Access Billing System (CABS) effective with your September 2011 invoice.

Customers will see no change in their current billing cycles and will continue to receive their electronic media in BOS version 50 standard format. Customers familiar with the CABS billing system invoices will now see consistent wholesale invoicing across all CenturyLink serving areas. Legacy Qwest billing is not being impacted at this time.

To ensure a smooth transition to the CABS billing system, CenturyLink will be posting additional Billing System Conversion information on our website at <u>www.centurylink.com/wholesalebillingconversions</u>. The information on this site will address questions that may arise between now and the time of the conversion.

Notable changes as a result of the conversion to the CABS billing system are as follows:

- New Billing Account Numbers (BANs), which include, where applicable, a consolidation of BANs at a state level, rather than at a LATA level;
- Switched invoices will summarize usage detail at a master CIC level;
- Customer Service Record (CSR) formatting for all services;
- Channel Mileage USOCs will be split into separate fixed and variable USOCs, rather than a single combination USOC.

Customers who responded by June 30, 2011 to our May 25, 2011 offer for a sample CABS BOS BDT File have received or will receive the sample file soon.

Please ensure that all impacted work groups within your company are aware of this billing system change. Contact your CenturyLink Account Team or the Wholesale Service Centers if you have any questions. CenturyLink looks forward to assisting you through this billing system conversion.

Sincerely,

CenturyLink Inc., on behalf of itself and its subsidiaries