

Washington  
Docket No. 100820  
Response to Sprint Data Request No. 47  
Respondent: Legal  
Witness: None  
Response Date: July 23, 2010

47. CenturyLink and Qwest's April 22, 2010 press release announcing the merger between the two entities states that the "transaction is expected to generate annual operating and capital synergies of approximately \$625 million when fully recognized over a three- to five-year period following the close of the transaction."
- a. Are any of those expected synergies related to intrastate switched access savings between Qwest and CenturyLink? If yes, how much annually?
  - b. Are any of those expected synergies related to interstate switched access savings between Qwest and CenturyLink? If yes, how much annually?
  - c. Are any of those expected synergies related to special access savings between Qwest and CenturyLink? If yes, how much annually?
  - d. Are any of those expected synergies related to reciprocal compensation under section 251(b)(5) savings between Qwest and CenturyLink? If yes, how much annually?
  - e. Are any of those expected synergies related to reductions in traffic origination and termination costs between Qwest and CenturyLink other than switched and special access savings or reciprocal compensation savings? If yes, how much annually?
  - f. Identify the amount of synergies in this state for subparts a. to e. above.
  - g. Identify the amount of and describe any other merger synergies specific to operations or capital expenses in this state not identified in subparts a. to f. above.

**OBJECTION:**

CenturyLink objects to this request because it is not reasonably calculated to lead to the discovery of admissible or relevant evidence. As noted in the Application and Joint Applicant's testimony, the proposed transaction will not change the corporate identities of the CenturyLink or Qwest companies assessing access charges nor the tariffs underlying those charges. Moreover, switched access is an industry issue, and it is thus inappropriate to address switched access for the merging entities alone. Further, any attempt by the Joint Applicants to adjust access charges would have to be separately submitted to, and approved by the Commission. Review of, or adjustments to access charges have not been considered proper areas of inquiry in Commission dockets reviewing merger/acquisition transactions. See most recently, Commission orders in Docket No. UT-082119 (CenturyTel/Embarq) and Docket No. UT-090842 (Frontier/Verizon), neither of which address or adjust access charges.

This request is designed to "fish" for information that might be used in advocating positions on issues that are clearly outside the scope of this proceeding (i.e. adjustments to access charges). Therefore it is not reasonably calculated to lead to the discovery of admissible or relevant evidence in this proceeding.

SUPPLEMENTAL RESPONSE:

- a. No.
- b. No.
- c. No.
- d. No.
- e. No.
- f. Not applicable.
- g. The synergy estimates were developed at a company level only; thus, no state specific synergy estimates are available.

Supplemental Respondent: John Felz  
Supplemental Response Date: August 13, 2010