

[Service Date August 3, 2011]

August 3, 2011

Lisa A. Anderl
CenturyLink, Inc.
1600 7th Avenue, Room 1506
Seattle, WA 98191

RE: Name Change Notice of Qwest Communications Company, LLC, Docket
UT-111320; and Name Change Notice of Qwest LD Corp., Docket UT-111321

Dear Ms. Anderl:

On July 25, 2011, the Washington Utilities and Transportation Commission (Commission) received two notices of name changes from CenturyLink. The first notice, docketed as UT-111320, states that Qwest Communications Company, LLC, is changing its name to CenturyLink QCC, and the second notice, docketed as UT-111321, states that Qwest LD Corporation is changing its name to CenturyLink LD. On August 2, 2011, CenturyLink filed a letter with the Commission in each of the above-referenced dockets clarifying that the "CenturyLink" names are being added as d/b/a's, not replacements for the companies' existing names.

The filings in these dockets are comparable to the Qwest Corporation filings in consolidated Dockets UT-111241, *et al.*, which revised that company's tariffs to add the d/b/a of "CenturyLink QC." Order 01 in those dockets describes the relevant circumstances under which the Commission found it necessary to address that name change, and those circumstances are equally applicable here.

Specifically, CenturyLink, Inc., has filed a complaint in U.S. District Court for the Western District of Washington, Case No. 2:11-CV-00633 (Complaint) challenging certain portions of Order 14 in Docket UT-100820 (Order 14), approving the acquisition of Qwest Communications International Inc. by CenturyTel, Inc., subject to the companies' acceptance of the conditions specified in that order. The Commission in Order 01, in consolidated Dockets UT-111241, *et al.*, required Qwest Corporation to

include language in its tariffs explaining that the company's use of the "CenturyLink QC" d/b/a is subject to the ultimate outcome in the Complaint.

Both Qwest CC and Qwest LD are classified as competitive telecommunications companies and thus do not maintain tariffs or price lists. Competitive classification, however, "do[es] not relieve any company from any of its duties and obligations under the laws of the state of Washington." WAC 480-120-016. "The commission will, when appropriate, investigate or complain against a rate, term, or condition provided pursuant to competitive classification." WAC 480-120-266(1)(b).

The Commission does not find it necessary at this point in time to investigate, complain against, or otherwise initiate adjudicative proceedings to determine the permissibility of Qwest CC's and Qwest LD's use of a "CenturyLink" d/b/a. The Commission's decision not to take such action is expressly conditioned on the Commission's and the companies' understanding that the companies' use of those d/b/a's is subject to the Court's decision in the Complaint and any subsequent judicial review of, or Commission action in response to, that decision. By permitting Qwest CC to use the name "CenturyLink QCC" and allowing Qwest LD to use the d/b/a "CenturyLink LD," the Commission does not waive any position it has taken or may take in response to the Complaint, including but not limited to taking the position that any judicial decision invalidating any part of Order 14 must result in a remand to the Commission to determine whether, and if so under what substitute conditions, the Commission should approve the transfer of control of Qwest Corporation to CenturyLink, Inc.

Sincerely,

DAVID W. DANNER
Executive Director and Secretary