

**Exhibit No. ___ (RB-5)
Docket UT-100820
Witness: Rebecca Beaton**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

**QWEST COMMUNICATIONS
INTERNATIONAL INC. AND
CENTURYTEL, INC.**

**For Approval of Indirect Transfer of
Control of Qwest Corporation, Qwest
Communications Company LLC, and
Qwest LD Corp.**

DOCKET UT-100820

**EXHIBIT TO TESTIMONY OF
REBECCA BEATON
STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Qwest Response to UTC Staff Data Request No. 138

September 27, 2010

August 26, 2010

Washington
UT-100820
Staff 9-138S1

INTERVENOR: Washington Utilities and Transportation Commission Staff

REQUEST NO: 138S1

Re: Number Resources

Please provide the cost, by rate center, to consolidate rate centers where two-way EAS local calling exists:

- a. within Qwest territory;
- b. within CenturyLink territory; and
- c. between Qwest and CenturyLink territories.

RESPONSE:

Joint Applicants object to this request because it seeks to require a special study, and would require Joint Applicants to speculate about hypothetical events. Subject to and without waiving its objections, Joint Applicants state:

CenturyLink has not completed any studies to determine the cost to consolidate rate centers under any of the requested scenarios in Washington.

Qwest has not completed any studies to determine the cost to consolidate rate centers under any of the requested scenarios in Washington.

Respondents: John Felz, CenturyLink
Mark Reynolds, Qwest

Witness: TBD

SUPPLEMENTAL RESPONSE: 8/26/2010

a.) The cost to consolidate two Rate Centers where two-way EAS local calling exists is typically not significant presuming, (1) neither Rate Center contains a Wire Center or Exchange that has two-way EAS local calling to a non-Qwest local exchange carrier Wire Center and (2) neither has two-way EAS local calling to an Exchange or Wire Center that the other does not. These differences complicate a Rate Center consolidation. To consolidate Rate Centers involving a non-Qwest LEC, Qwest would need to coordinate with the LEC to secure a Number Porting Agreement (contract). Attorneys and contract negotiators would need to be engaged. Commission approval of the contract and the proposed Rate Center consolidation would be necessary. Once approval was granted, the industry deserves a minimum

90-day notice of the change and a Qwest project team would execute the change. This same answer applies if three or more Rate Centers are part of the consolidation. Because this can be procedurally complex, Qwest generally avoids Rate Center consolidation where the involved exchanges do not share *identical* local calling areas. Where the involved exchanges share *identical* local calling areas, Qwest is generally receptive to Rate Center consolidation at no cost to involved customers. Here Qwest's costs are labor-related and typically not in excess of \$10,000 per consolidation.

b.) While CenturyLink has not completed any studies to estimate the cost to consolidate rate centers within the CenturyLink territory, the cost/impact is typically not significant presuming: 1) the rate centers to be consolidated are contiguous and have identical calling scopes for local and extended area calling; 2) the end user rates for each of the rate centers to be consolidated are the same; 3) the rate centers share a common switch routing hierarchy (i.e. host/remote and tandem); 4) each exchange or wire center involved in the consolidation retains its existing locality identifier in the LERG.

c.) While Qwest and CenturyLink have not discussed or evaluated this possibility yet, the cost to consolidate a CenturyLink and a Qwest Rate Center where two-way EAS local calling exists would also likely not be significant presuming, (1) neither Rate Center contains a wire center that has two-way EAS local calling to a non-Qwest, non-CenturyLink local exchange carrier and (2) neither has two-way EAS local calling to an Exchange or Wire Center that the other does not; 3) the end user rates for each of the rate centers to be consolidated are the same; 4) the rate centers are contiguous and share a common switch routing hierarchy (i.e. host/remote and tandem); 5) each exchange or wire center involved in the consolidation retains its existing locality identifier in the LERG.

Respondent: Thomas Freeberg, Qwest and John Felz, CenturyLink

Witness: TBD