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September 22, 2010

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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Re: *Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a/ CenturyLink for Consent to Transfer of Control, WC Docket No. 10-110 – Ex Parte Comment*

Dear Ms. Dortch:

CenturyLink, Inc. (“CenturyLink”) and Qwest Communications International Inc. (“Qwest”) write in response to Integra and tw telecom’s recent *ex parte* letter of September 17, 2010, in which they propose to subject the applicants to exceptionally wide-ranging and dilatory information requests. These proposed information requests would accomplish nothing at this late date beyond delay in the merger-review process, and the Commission should reject them.

First, the suggested information requests are wholly unnecessary because the issues they address are already subject to extensive and granular review in multiple state proceedings, as the proffered exhibits establish. The companies provide no reason why the Commission should open a duplicative investigation into the same issues, nor do they explain why the Commission is better situated than the states to micro-manage those issues, which include the minutiae of personnel decisions or the ordinary-course business decisions of the merging parties. The Commission historically has left these types of day-to-day management considerations to the companies, knowing that the states have in place robust processes for oversight and enforcement of established performance metrics. Integra and tw telecom’s filing provides no grounds for the Commission to deviate from this customary practice.

Moreover, many of the specific information requests suggested by Integra and tw telecom would be improper in any forum. Some of the proposed requests seek information that is confidential and plainly inappropriate as a subject of public inquiry, such as what advice outside consultants are providing to the companies during the merger process. Other proposed requests already have been asked and answered. For example, CenturyLink and Qwest *already explained* in their Reply Comments that they have committed to making no changes to OSS for at least a year, and that any further decisions will occur post-closing. CenturyLink has been systematically planning the necessary integration of facilities, personnel, and processes,

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consistent with its many prior successful acquisitions (just this week CenturyLink announced a comprehensive set of “second tier” management decisions that will ensure complete continuity of services and effective coordination of operations immediately upon closing). Integra and tw telecom are fully aware that most of their proposed information requests about personnel and OSS decisions are either inappropriate, redundant, or pointless. That Integra and tw telecom persist in pressing such inquiries anyway betrays an intent to delay this proceeding.

For these reasons, the Commission should disregard Integra and tw telecom’s filing in its entirety. Please contact me if you have any questions.

Sincerely,

/s/

Karen Brinkmann
LATHAM & WATKINS LLP

Counsel for CenturyLink, Inc.

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