

September 23, 2010

**VIA ECFS**

***EX PARTE***

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

**Re: *Applications Filed By Qwest Communications International Inc. And CenturyTel, Inc., d/b/a CenturyLink For Consent To Transfer Of Control, WC Dkt. No. 10-110***

Dear Ms. Dortch:

Yesterday, Karen Clauson, Vice President, Law & Policy, and Bonnie Johnson, Director, Carrier Relations, for Integra Telecom, Inc. (“Integra”), Lynne Powers of Bayview Management Group and outside consultant to Integra, and the undersigned, representing Integra and tw telecom inc. (“tw telecom”), participated in a teleconference with Nick Alexander, Alex Johns, Carol Simpson, and Don Stockdale of the Wireline Competition Bureau (“Bureau”) regarding the above-referenced proceeding.

The participants discussed the filing made by Integra and tw telecom in the above-referenced proceeding on September 17, 2010.<sup>1</sup> They explained that the Bureau should pose the information

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<sup>1</sup> See generally Letter from Thomas Jones, Counsel for Integra Telecom, Inc. and tw telecom inc., to Marlene H. Dortch, Secretary, FCC, WC Dkt. No. 10-110 (filed Sept. 17, 2010) (attaching “Proposed Information Requests”).

requests proposed by Integra and tw telecom to the Applicants in order to understand and evaluate the Applicants' plans for operations support systems ("OSS") integration. CenturyLink has told the Arizona Corporation Commission Staff that it expects to consolidate OSS and billing systems,<sup>2</sup> thereby eliminating any doubt that OSS changes will in fact occur at some point. The participants further explained that the information requests proposed by Integra and tw telecom are necessary to evaluate the Applicants' assertions that, among other things: (1) the Merged Company will retain Qwest's experience and OSS knowledge; (2) the Merged Company will not need to develop new systems; (3) CenturyLink's previous and ongoing integrations have been successful; and (4) the proposed transaction will yield substantial operating synergies.

Please do not hesitate to contact me at (202) 303-1111 if you have any questions or concerns about this submission.

Respectfully submitted,

/s/ Thomas Jones

Thomas Jones

Nirali Patel

*Counsel for Integra Telecom, Inc. and tw telecom inc.*

cc (via email): Nick Alexander  
Alex Johns  
Carol Simpson  
Don Stockdale

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<sup>2</sup> In response to Arizona Corporation Commission Staff Data Request 7.15, Mark Harper, Director of Regulatory Operations and Policy for CenturyLink, stated that "CenturyLink anticipates improved wholesale customer service over time through the consolidation of OSS and billing systems and sales and account management teams." See CenturyLink's Responses to Arizona Corporation Commission Staff's Seventh Set of Data Requests to CenturyLink, ACC Docket Nos. T-01051B-10-0194 et al., at 9 (dated Aug. 13, 2010).