

November 3, 2010

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol Street NE #215  
PO Box 2148  
Salem, Oregon 97308-2148Administrative Law Judge Allan Arlow  
Oregon Public Utility Commission  
550 Capitol Street NE #215  
PO Box 2148  
Salem, Oregon 97308-2148

*RE: In the Matter of CenturyLink, Inc., Application for Approval of Merger between CenturyTel, Inc. and Qwest Communications International, Inc.*  
Oregon PUC Docket UM 1484

Dear Judge Arlow:

Pursuant to Your Honor's Ruling dated November 3, 2010, Joint CLECs<sup>1</sup> hereby respond to the Request for Clarification of Ruling submitted by CenturyLink on October 22, 2010 ("Clarification Request"). In its Clarification Request, CenturyLink seeks modification of Your Honor's Ruling dated October 15, 2010, which granted Joint CLECs Motion to Amend Schedule ("Ruling Amending Schedule"). CenturyLink's Clarification Request asks the Commission to clarify the scope of Staff and Intervenor Supplemental Testimony due November 12, 2010.

While Joint CLECs concur generally in CenturyLink's description of the scope of the supplemental testimony to be filed on November 12, 2010, the Clarification Request inaccurately describes the universe of HSR documents that fall within the proper scope of the Supplemental Testimony that Joint CLECs requested in the motion that was granted in the Ruling Amending Schedule. The Clarification Request states that:

. . . the opportunity to file additional testimony was for the limited purpose of addressing . . . (2) the Hart-Scott-Rodino "HSR" documents *that were provided to Joint CLECs on October 12, 2010.* (Emphasis added).

In fact, the Joint CLEC Motion to Amend Schedule made clear that the request for an opportunity to file supplemental testimony related to any and all HSR documents produced by

<sup>1</sup> Joint CLECs: XO Communications Services, Inc., tw telecom of oregon, llc, Integra Telecom of Oregon, Inc., Integra Telecom of Oregon, Inc., Advanced TelCom, Inc., Electric Lightwave, LLC, Eschelon Telecom of Oregon, Inc., Oregon Telecom Inc., and United Telecommunications Inc. d/b/a Unicom, Covad Communications Company, PriorityOne Telecom, Inc., & Charter Fiberlink OR-CCVII, LLC.

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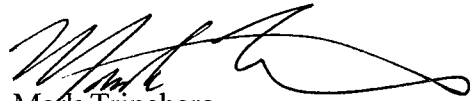
CenturyLink and Qwest *after the August 24, 2010 Intervenor Testimony deadline*.<sup>2</sup> Prior to the August 24, 2010 Intervenor testimony deadline, CenturyLink and Qwest had produced only a portion of the HSR documents in response to Staff Data Request 66.<sup>3</sup> CenturyLink and Qwest made several additional productions of HSR documents subsequent to the August 24, 2010 Intervenor testimony deadline, including productions made on or about September 22, 2010, October 8, 2010 and October 12, 2010. The HSR documents produced on these subsequent dates are all within the proper scope of the November 12, 2010 Staff and Intervenor Supplemental Testimony.

Accordingly, any modification to the Ruling Amending Schedule should make clear that the proper scope of the November 12, 2010 Staff and Intervenor Supplemental Testimony includes testimony related to any and all HSR documents produced subsequent to the August 24, 2010 Intervenor Testimony deadline.

Thank you for your consideration of this matter.

Very truly yours,

Davis Wright Tremaine LLP



Mark Trincherro  
Of Attorneys for Joint CLECs

cc: Service List

<sup>2</sup> See Joint CLEC Motion to Amend Schedule, dated October 11, 2010, pp. 3-4.

<sup>3</sup> See Joint CLEC Motion to Compel, dated September 20, 2010, p. 5.

**CERTIFICATE OF SERVICE**  
**UM 1484**

I hereby certify that the **JOINT CLEC'S Response to CenturyLink's Request for Clarification of Administrative Law Judge's Ruling** was served on the following persons on November 3, 2010, by email to all parties and by U.S. Mail to parties who have not waived paper service:

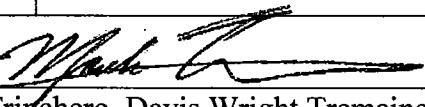
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Dated: November 3, 2010


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