



CenturyLink™

WILLIAM E. HENDRICKS

November 8, 2011

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol Street NE, Ste 215  
Salem, OR 97301-2551

RE: UM-1484 CenturyLink/Qwest Merger

Dear Commission:

Pursuant to Docket UM 1484, Order No. 11-095 ("Order"), CenturyLink provides the enclosed information in compliance with Condition No. 35 of the Order.

If you have any questions or concerns regarding these copies, please do not hesitate to contact me.

Sincerely,

William E. Hendricks  
Senior Corporate Counsel

Enclosures  
cc: Service List

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**Oregon Docket No. UM 1484  
Condition 35 - Legacy Embarq**

		Category	Comparison Threshold	3Q2011
<b>OR</b>	<b>Average Response Time to Pre-Order Queries</b> (Reported in Seconds)		10.27	2.57
	<b>Average Completed Interval</b> (Reported in Days)	Resale	2.97	0.59
		UNE	7.96	3.29
		Other	6.54	-
	<b>Customer Trouble Report Rate</b> (Reported as a Percentage)	Resale	0.46%	0.98%
		UNE	2.10%	1.53%
		Other	0.00%	0.00%
	<b>Average Time to Restore</b> (Reported in Hours)	Resale	21.19	12.53
		UNE	16.99	13.12
		Other	-	-
<b>Center Responsiveness</b> (Percentage)		91.44%	95.39%	

Measures Missing Comparison Threshold      1  
Percent Not Missing Comparison Threshold      91%

*\* Only 7 tickets for the quarter constitute a difference between result and benchmark*

**FCC Docket No. 10-110 Order 11-47  
Section IV.B - Commitments Regarding Wholesale Operations**

**Oregon Docket No. UM 1484 Condition 35 - Legacy Qwest**

FCC Merger Commitment Merger Measure	Description	PID	*	Product Category <i>(see Notes for products, lines &amp; intervals as applicable)</i>	Comparison Threshold <sup>1</sup>	3Q2011	Comments
Average response time to pre-order queries (in seconds)	The number of seconds from receipt of CLEC query to return of requested data.	PO-1A	↓	All	5	2	
		PO-1X	↓	All	8	4	
Percentage of electronically submitted resale and UNE orders	Percentage of electronically submitted resale and UNE orders confirmed within specified timeframes	PO-5B	↑	Resale	100%	100%	The comparison threshold is effectively "perfection," and random variation is nearly zero. Differences between base year and post-merger period are miniscule. In the context that the applicable benchmark is 90%, such small differences are immaterial.
				UNE Specials	97%	90%	
Missed appointments / Appointments met	Percent of orders completed in the reporting period on or before the application due date.	OP-3	↑	Resale	87%	100%	
				UNE Loop POTS	93%	95%	
Average provisioning delay days (in days)	Average number of business days service is delayed beyond Applicable Due Date for facility reasons.	OP-6B	↓	Resale	na	na**	The difference reflected is equivalent to a delay of approximately three hours over a two year time span.
				UNE Loop POTS	8.4	8.6	
Provisioning - Percentage of installation troubles reported within 30 days	Percentage of inward line / circuit / trunk service orders that are free of repair trouble reports within 30 calendar days of installation completion.	OP-5A	↑	Resale	67%	94%	
				UNE Loop POTS	95%	96%	
				UNE Specials	89%	95%	
Repair/Maintenance - Network Trouble Report Rate (number per 100 lines or circuits in service)	Percentage of trouble reports to the total installed base of services or elements within a calendar month.	MR-8	↓	Resale	5.1	0.4	
				UNE Loop POTS	0.7	0.3	
Repair/Maintenance - Mean Time to Repair (in hours and minutes)	Time from receipt of trouble to time trouble report is cleared divided by total number of trouble reports closed in reporting period.	MR-6	↓	Resale	29:13	20:04	
				UNE Loop POTS	12:59	9:08	
Repair/Maintenance - Percentage of Repeat Reports within 30 Days	Percentage of repeated trouble reports received in 30 days of the initial report to the total number of trouble reports received in the period.	MR-7	↓	Resale	35%	3%	
				UNE Loop POTS	16%	3%	
				UNE Specials	30%	11%	
Carrier Service Center - Average Speed of Answer - Ordering	Timeliness of CLEC access to the Company's intercon-nection provisioning centers	OP-2	↑	All	82%	96%	
Carrier Service Center - Average Speed of Answer - Repair	Timeliness of CLEC access to the Company's intercon-nection repair centers.	MR-2	↑	All	78%	87%	

<sup>1</sup> Comparison Threshold applies the provision of paragraph (or condition) number (V.B) in the above-referenced FCC Order, which calls for the "benchmark value to be set at one standard deviation below the 12-month average..." Thus, the threshold consists of the 12-month average pre-merger 2010 performance level plus the one standard deviation.

\* ↑ = Higher is good ↓ = Lower is good

\*\* No activity for this measure the quarter

Measures Missing Comparison Threshold	2
Percent Not Missing Comparison Threshold	90%

**FCC Docket No. 10-110 Order 11-47  
Section IV.B - Commitments Regarding Wholesale Operations**

**NOTES:**

Percentage of electronically submitted resale and UNE orders (PO-5B)	POTS/Pre-Qualified Complex		Special Services	
	The following products are reported above under these categories:		The following products are reported above under these categories:	
	Resale	UNE	Resale	UNE
	<b>24 Hours</b>		<b>24 hours</b>	
1-10 lines	ISDN BRI <sup>Note A</sup>			
1-19 lines	Centrex (non-Special) <sup>Note B</sup>			
1-24 loops		UBL - Analog		Sub-loops, DS3 Capable
1-39 lines	Res/Bus POTS			
All	Centrex line feature changes			
	<b>48 hours</b>		<b>48 hours</b>	
1-3 ckts	UBL DS3		ISDN PRI	
1-10 lines	ISDN BRI <sup>Note C</sup>		DS0 or Voice Grade Equivalent	
1-24 trunks	PBX			
1-24 ckts			DS1 Facility, DS3 Facility	EEL-DS1 <sup>Note D</sup>

<b>Note A</b>	ISDN BRI - Conversion as is - Adding/Changing features - Add primary directory listing - Add call appearance
<b>Note B</b>	No Common Block configuration
<b>Note C</b>	ISDN BRI - New installs - Address changes - Change to add Loop

<b>Note D</b>	Included in Product Reporting Group (b)
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**FCC Docket No. 10-110 Order 11-47**  
**Section IV.B - Commitments Regarding Wholesale Operations**

NOTES:

PID <sup>1</sup>	FCC Measure	Resale	UNE Loop POTS	UNE Specials
OP-3	Missed appointments / Appointments met	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX	Analog Loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	
OP-6B	Average provisioning delay days	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX	Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	
OP-5A	Provisioning - Percentage of installation troubles reported within 30 days	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX	Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	ADSL capable loop DS1-capable loop DS3 and higher loops EEL-DS0 EEL-DS1 EEL-Above DS1 ISDN-capable loop UDIT-DS1 UDIT-Above DS1 xDSL-i capable loop
MR-8	Repair/Maintenance - Network Trouble Report Rate	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI	Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	

**FCC Docket No. 10-110 Order 11-47**  
**Section IV.B - Commitments Regarding Wholesale Operations**

**NOTES:**

<p align="center"><b>MR-6</b></p>	<p align="center"><b>Repair/Maintenance - Mean Time to Repair</b></p>	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX	Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	
<p align="center"><b>MR-7</b></p>	<p align="center"><b>Repair/Maintenance - Percentage of Repeat Reports within 30 Days</b></p>	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX	Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	ADSL capable loop DS1-capable loop DS3 and higher loops EEL-DS0 EEL-DS1 EEL-Above DS1 ISDN-capable loop UDIT-DS1 UDIT-Above DS1 xDSL-I capable loop

<sup>1</sup> "Performance Indicator Definition"

## CERTIFICATE OF SERVICE

UM 1484

I hereby certify that on the 8<sup>th</sup> day of November, 2011, I served the foregoing CENTURYLINK'S COMPLIANCE WITH CONDITION NO. 35 OF ORDER NO. 11-095, in the above entitled docket on the following persons via e-mail, and via U.S. Mail by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. Post Office at Portland, Oregon.

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DATED this 8<sup>th</sup> day of November, 2011.

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By: \_\_\_\_\_

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(w) denotes waiver of paper service

\* denotes signed Protective Order No. 10-192

\*\* denotes signed Protective Order Nos. 10-192 and 10-291