

BEFORE THE UTAH PUBLIC SERVICE 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 Corporation

Docket No. 10-049-16

DECLARATION OF MARK TRINCHERO
IN SUPPORT OF INTEGRA'S MOTION
TO COMPEL

I, Mark Trinchero, declare as follows:

1. I am an attorney for Integra Telecom of Utah, Inc. ("Integra"). I make this declaration based on personal knowledge, in support of the Integra's Motion to Compel.
2. Attached as Exhibit 1 is a true copy of CenturyLink's Objections to Integra Telecom Information Requests, Request No. 143.
3. Attached as Exhibit 2 is a true copy of Qwest's Response to Integra Telecom Information Requests, Request No. 143.
4. Attached as Exhibit 3 is a true copy of CenturyLink's Objections to Integra Telecom Information Requests, Request No. 156.
5. Attached as Exhibit 4 is a true copy of DPU Set 1, Requests 1.3 and 1.4.
6. Attached as Exhibit 5 is a true copy of correspondence dated September 2, 2010, from counsel for Joint Applicants to counsel for Integra, objecting to Request No. 156 to the

extent it would require providing HSR documents already produced to DPU in response to DPU data requests 1.3 and 1.4. Among other things, the letter states that releasing information to Integra “would cause irreparable competitive harm to the Joint Applicants, such that the Commission’s Protective Order is not sufficient to mitigate this impact.”

7. Attached as Exhibit 6 is a true copy of the August 23, 2010 Procedural Order issued by the Arizona Corporation Commission in Docket No. T-01051B-10-0194, *et. al.*, which Order denies Joint Applicants’ request to adopt a “Staff Eyes Only” confidentiality designation.

8. Attached as Exhibit 7 is a true copy of the August 3, 2010 Order Denying Joint Applicants’ Request to Supplement Protective Order with Creation of Additional Protected Category of Information, issued by the Washington State Utilities and Transportation Commission in Docket No. UT-100820, which Order denies Joint Applicants’ request to adopt a “Staff Eyes Only” confidentiality designation.

9. Attached as Exhibit 8 is a true copy of correspondence from Qwest’s Associate General Counsel, stating that it had filed or would file with the Washington Utilities and Transportation Commission the attached indexes indicating the classification of HSR documents as confidential, highly confidential, or proposed Staff Eyes Only.

10. In telephone conversations and voicemails on September 16, I specifically asked counsel for CenturyLink and for Qwest to produce all requested HSR documents, but Joint Applicants again refused to do so.

*I hereby declare that the above statement is true to the best of my knowledge and belief
and that I understand it is made for use as evidence in court and is subject to penalty for perjury.*

DATED this 20th day of September, 2010.

By: _____
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Of Attorneys for Integra Telecom of Utah, Inc.