

STATE OF UTAH
BEFORE THE UTAH PUBLIC SERVICE COMMISSION

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

SURREBUTTAL TESTIMONY OF
MICHAEL R. HUNSUCKER
DIRECTOR, CLEC MANAGEMENT,
CENTURYLINK, INC.

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Michael R. Hunsucker. My business address is 5454 W. 110th Street,
3 Overland Park, Kansas 66211.

4 **Q. ON WHOSE BEHALF ARE YOU SUBMITTING SURREBUTTAL**
5 **TESTIMONY?**

6 A. I am submitting rebuttal testimony on behalf of CenturyLink, Inc., referred to herein as
7 “CenturyLink.”

8 **Q. ARE YOU THE SAME MICHAEL HUNSUCKER WHO SUBMITTED**
9 **REBUTTAL TESTIMONY FOR CENTURYLINK IN THIS PROCEEDING?**

10 A. Yes.

11

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 The purpose of my testimony is to address rebuttal comments made by Douglas Meredith
14 of the Utah Rural Telecom Association.

15

16 **Q. WHAT COMMENTS DO YOU HAVE REGARDING MR. MEREDITH’S**
17 **REBUTTAL TESTIMONY?**

18 A. Mr. Meredith’s only concern appears to be maintaining the existing meet points between
19 Qwest and the rural telephone companies.¹ CenturyLink does not see this as an issue that
20 needs to be addressed in this proceeding.

21

¹ Meredith Rebuttal at 3.

1 **Q. CAN YOU PLEASE ELABORATE ON WHY THIS ISSUE DOES NOT NEED TO**
2 **BE ADDRESSED?**

3 A. Meet points between incumbent telephone companies are established on an individual
4 case basis. The meet point locations and other relevant specifics are negotiated between
5 the parties and then contractually established in the National Exchange Carrier
6 Association (NECA) tariff. The NECA tariff is a federal tariff, not a state tariff.
7 Additionally, because there is an existing formal process to negotiate and memorialize
8 meet points, there is no ability for a party to make any changes without the acceptance of
9 the other party, and therefore no need to impose any condition that would prohibit
10 changes for a period of time.

11
12 Further, assuming the Commission does have the ability to mandate a “freeze” of
13 federally tariffed meet points, this would constrain the rural companies and the post-
14 merger Qwest affiliate from making a mutual determination that it would be in both
15 parties’ interests to modify or move a meet point. For the above reasons, the rural
16 companies are assured of no changes to any meet points that do not meet their approval
17 and no condition is necessary.

18

19 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A. Yes.