

Utah
10-049-16
INTEGRA TELECOM 1-143

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 143

Refer to page 6 of CenturyTel Inc.'s Form S-4, dated June 4, 2010. Provide a copy of the requisite notice, report forms, and any other documents (including supplemental filings) filed by CenturyLink or Qwest under the Hart-Scott-Rodino (HSR) Act with the Department of Justice and the Federal Trade Commission.

RESPONSE:

Qwest objects to this request insofar as it is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence. The filings prepared by Qwest as required by the HSR Act are specifically designed to provide to the Department of Justice and the Federal Trade Commission the information that it requires to analyze the merger on a national level addressing specific federal antitrust issues under the Clayton Act. This is not the proper jurisdiction for such an analysis. In addition, the information requested is highly-confidential, commercially-sensitive information the release of which, particularly to Qwest's competitors such as Integra, would cause irreparable competitive harm to Qwest, the impact of which would not be mitigated by the terms of any Protective Order that may be issued in this proceeding. Given the highly-confidential and competitively sensitive nature of these documents, Qwest intends to file a motion for the entry of an appropriate protective order for the limited disclosure of such documents.

Respondent: Legal, Qwest