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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of Qwest Communications Company, LLC to Amend its Certificate of Public Convenience and Necessity No. 2204	Docket No. 13-2204-01 PETITION TO AMEND CPCN NO. 2204
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Qwest Communications Company, LLC d/b/a CenturyLink QCC (“QCC”)¹ respectfully requests that the Public Service Commission of Utah (“Commission”) approve its request to amend Certificate of Public Convenience and Necessity No. 2204 (“CPCN 2204”). Specifically, QCC seeks to amend CPCN 2204 to permit it to provide local exchange services in the same manner as other competitive local exchange carriers (“CLECs”). In support of this Petition, CenturyLink offers the following supporting information:

1. On August 21, 1995, QCC was granted CPCN 2204 as part of Docket No. 94-2204-01. A copy of CPCN 2204 is attached hereto as Exhibit 1.

¹ The original Certificate of Public Convenience and Necessity No. 2204 was issued in the name of Qwest Communications Corporation. In 2009 Qwest Communications Corporation changed its name to Qwest Communications Company, LLC.

2. CPCN 2204 permits QCC to provide public telecommunications services anywhere in Utah, with one exception; the existing CPCN 2204 does not permit QCC to provide local exchange services in Utah.
3. QCC now seeks to amend CPCN 2204 to remove the local exchange service restriction, and serve in the same manner as other CLECs. Other CLEC certificates permit them to serve throughout Utah, excluding those local exchanges of less than 5,000 access lines of incumbent telephone corporations with fewer than 30,000 access lines in the state
4. The telecommunications industry, as well as federal and state regulation of telecommunication providers has changed significantly from the time CPCN 2204 was first issued, and there is no basis to restrict QCC from providing basic local exchange services in the same manner as other CLECs, including serving Qwest Corporation's ("QC") ILEC territory.
5. QC faces significant competition throughout its service territory. The Utah Legislature recognized this competition and changed the manner in which QC was regulated in 2005.
6. QCC desires to remove the restriction on the provision of local exchange service so it can more effectively compete, particularly in the business market. QCC plans to initially offer business bundles consisting of the following: Ethernet and MPLS data circuits; Voice over Internet Protocol services; customer premises equipment; hosting; managed services (including, but not limited to, cloud applications and security).
7. Unlike QCC, other CLECs have access to UNEs at low TELRIC-based prices. Thus, they are able to offer more competitive prices on local connections, placing QCC at a competitive disadvantage. Removing the restriction on local exchange service will permit QCC to purchase unbundled network elements ("UNEs"), just as other CLECs do.

8. The Commission previously determined that QCC has sufficient technical, financial and managerial resources to provide public telecommunications services. Further, amending CPCN 2204 to remove the restriction on the provision of local exchange services will further promote competition in the provision of telecommunications services in Utah.

9. CenturyLink requests that the Commission expeditiously approve the amendment to CPCN 2204. In the event there is no opposition to this Petition within 30 days, QCC requests that the Petition be adjudicated informally under Utah Code Ann. §63G-4-203 and R746-110 of the Commission's Rules.

WHEREFORE, QCC respectfully requests that the Commission approve the amendment to CPCN 2204 as set forth herein.

DATED this 21st day of March, 2013.

CENTURYLINK

A handwritten signature in cursive script that reads "Torry Somers". The signature is written in black ink and is positioned above a solid horizontal line.

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