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Via U.S. Mail, Fax and Docket Filing

Arizona Corporation Commission

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OCT 28 2011

Mr. Norman G. Curtright
Associate General Counsel
Qwest/CenturyLink
20 E. Thomas Road, 16th Floor
Phoenix, AZ 85012
Fax: 602.235.3107

DOCKETED BY	
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Re: Docket No. T-01051B-10-0200; Qwest's Responses to Discovery

Dear Mr. Curtright:

We recently received Qwest's responses to our discovery requests; the documents were addressed incorrectly (it appears that they were mailed by Qwest to our address, but at the wrong zip code; our zip code is 85019, not 85004). We have preliminarily reviewed Qwest's responses, and we have noted the following issues presented by the responses:

1. Many of the objections to the documents produced to us have been redacted, and it appears that important information was removed, but there is inadequate explanation for why that information was removed. For example, certain documents were redacted based on claims of privilege, but there is no specific information about why the information was redacted. The documents should be produced in whole. If not, a specific explanation is due for each redaction, and Qwest should produce complete copies to the Corporation Commission.
2. While some of the responses to our interrogatories identified specific respondents, many of the responses to our interrogatories were signed "CenturyLink Legal" - since you are the only person from Qwest/CenturyLink who has participated in this case before the commission, we will understand that the "CenturyLink Legal" responses are attributable to you unless other Qwest personnel are specifically identified.
3. Many of the documents are completely unintelligible, and appear to be poorly formatted computer system printouts. These appear to be important documents relating to the history of our account. Please produce revised documents that are legible, properly formatted and understandable and with

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sufficient information so that we can understand what you have provided, or provide us access to your computer systems so that we can view the information.

4. The document responses are incomplete. In particular, it does not appear that to date we have been provided with a complete set of our billing information, as we have requested. Please supplement the documents. We will notify you of any other deficiencies we find.
5. Qwest's repeated objection that attempts to narrow the issues to a single phone line are improper, particularly in light of Qwest's admission that is not able to identify which lines were transferred to us upon our acquisition of the hotel.

We will address any other issues with the responses provided to us by Qwest as we encounter them.

Qwest's inability or unwillingness to provide complete and accurate records and responses to date – including a clear billing history, and clear explanations for the charges on the bills in question – corroborates our complaint. Please contact me at (602) 717-8117 or (602) 738-7227 to discuss the issues above. I would also like to discuss other discovery with you.

Sincerely,



George Bien-Willner