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- BOB STUMP**  
Chairman
- GARY PIERCE**  
Commissioner
- BRENDA BURNS**  
Commissioner
- BOB BURNS**  
Commissioner
- SUSAN BITTER SMITH**  
Commissioner

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AZ CORP COMMISSION  
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Arizona Corporation Commission

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**IN THE MATTER OF THE APPLICATION OF QWEST CORPORATION D/B/A CENTURYLINK QC, QWEST COMMUNICATIONS COMPANY, LLC D/B/A CENTURYLINK QCC, QWEST LD CORP. D/B/A CENTURYLINK LD, EMBARQ COMMUNICATIONS, INC. D/B/A CENTURYLINK COMMUNICATIONS, AND EMBARQ PAYPHONE SERVICES, INC. D/B/A CENTURYLINK FOR WAIVER OF COMPLIANCE WITH THE PROVISIONS OF ARIZONA CORPORATION COMMISSION RULES RELATING TO PUBLIC UTILITY HOLDING COMPANIES AND AFFILIATED INTERESTS ARIZONA ADMINISTRATIVE CODE, TITLE 14, ARTICLE 8**

- DOCKET NO. T-01051B-13-0218
- DOCKET NO. T-02811B-13-0218
- DOCKET NO. T-04190A-13-0218
- DOCKET NO. T-20443A-13-0218
- DOCKET NO. T-03555A-13-0218

**JOINT APPLICANTS' PROPOSED CLARIFICATIONS TO STAFF'S RECOMMENDATIONS AND PROPOSED COMMISSION ORDER**

The Joint Applicants named above (the "CenturyLink Companies" or "CenturyLink") hereby request clarification of the Corporation Commission Staff's report and proposed Commission Order, dated August 27, 2013. The Joint Applicants and Staff have worked together on these proposed clarifications and both parties agree with and support the changes discussed herein.

The CenturyLink Companies are generally pleased with the Staff's report, analysis, and recommendation in favor of the requested waiver. The conditions the Staff proposes to place on the requested waiver are acceptable in principle to the CenturyLink Companies. The CenturyLink Companies request clarification of the conditions only insofar as they are somewhat vague, and

1 CenturyLink proposes to split the Staff's proposed condition 4 into two conditions.  
2 CenturyLink's proposal for a modified condition 4 focuses on the duty to provide a description of new  
3 contracts entered into during the year for services or for the purchase or sale of goods or services  
4 regardless of the anticipated amount of dollars to be transferred. Contracts from previous periods have  
5 already been reported to the Commission.

6 CenturyLink's new condition 5 separates the reporting of the dollar amounts transferred during  
7 the year from the description of contracts. Condition 5 requires the reporting of aggregate amounts of  
8 dollar transfers between affiliates, subject to the \$50,000,000 threshold, without reference to specific  
9 contracts. This aggregate dollar transfer information is readily available from the accounting system,  
10 while specific dollar transfer amounts per contract or transaction are not readily available.

11 For the foregoing reasons, CenturyLink respectfully asks the Commission to incorporate the  
12 amended language stated above into the Commission Order approving the waiver.

13 RESPECTFULLY SUBMITTED, this 5<sup>th</sup> day of September 2013.

14 CENTURYLINK

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19 Associate General Counsel  
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21 Phoenix, Arizona 85012  
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1 ORIGINAL and thirteen (13) copies filed  
this 5<sup>th</sup> day of September 2013, with:

2 Docket Control  
3 ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
4 Phoenix, Arizona 85007

5 Copy of the foregoing hand delivered  
this 5<sup>th</sup> day of September 2013, to:

6 Steve M. Olea, Director  
7 Utilities Division  
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