

**LAW OFFICE OF ALAN D. MANDL  
90 GLEZEN LANE  
WAYLAND, MA 01778**

*Admitted in Massachusetts  
and Rhode Island*

Telephone: (508) 276-1365  
Fax: (508) 276-0992  
Email: [alan@admlawoffice.com](mailto:alan@admlawoffice.com)

June 6, 2013

Catrice Williams  
Executive Secretary  
Department of Telecommunications and Cable  
1000 Washington Street- Suite 820  
Boston, MA 02118-6500

Re: DTC 13-6  
Investigation by the Department on its Own Motion to Determine whether an Agreement entered into by Verizon New England, Inc., d/b/a Verizon Massachusetts is an Interconnection Agreement under 47 U.S.C. §251 Requiring the Agreement to be filed with the Department for Approval in Accordance with 47 U.S.C. §252

Dear Secretary Williams:

Enclosed please find for filing in the above matter the Motion of Qwest Communications Company, LLC d/b/a CenturyLink QCC ("CenturyLink") for Limited Participant Status.

Please date stamp the enclosed duplicate copy of this cover letter and return it to me in the enclosed stamped, self-addressed envelope. Do not hesitate to contact me if the Department has any questions regarding this filing or needs additional information.

Thank you for your assistance.

Sincerely yours,



Alan D. Mandl

Enclosures  
cc: Service List

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Investigation by the Department on its Own ) Motion to Determine whether an Agreement ) Entered into by Verizon New England, Inc., ) d/b/a Verizon Massachusetts is an ) Interconnection Agreement under 47 U.S.C. ) § 251 Requiring the Agreement to be filed ) with the Department for Approval in ) Accordance with 47 U.S.C. § 252 )	D.T.C. 13-6
---	-------------

**MOTION OF QWEST COMMUNICATIONS COMPANY, LLC DBA CENTURYLINK  
QCC FOR LIMITED PARTICIPANT STATUS**

Pursuant to MA General Laws Chapter 30A Section 10 and 220 CMR 1.03, Qwest Communications Company, LLC dba CenturyLink QCC (“CenturyLink”) hereby moves that the Department grant it Limited Participant status in the above-captioned investigation.

CenturyLink’s future operations in Massachusetts may be affected by the Department’s orders in this proceeding. In particular, this is (as the Department noted in its Order Opening an Investigation, Declining to Issue an Advisory Ruling, and Denying Verizon MA’s Motion to Dismiss or Stay the Proceeding) an issue of first impression and one that may also have national implications. CenturyLink is a CLEC and IXC in Massachusetts, and has (itself and through its affiliates) LEC and IXC operations throughout the United States. The regulatory status of IP interconnection is of significant interest to CenturyLink.

CenturyLink therefore requests that it be accorded Limited Participant status, with the rights to argue orally at the close of a hearing, submit briefs and file a response to any dispositive motion (e.g., motion to dismiss, motion for summary judgment) brought by party.

Respectfully submitted,

QWEST COMMUNICATIONS COMPANY, LLC  
dba CENTURYLINK QCC

By its attorneys,



---

Alan D. Mandl, Esq.  
Law Office of Alan D. Mandl  
90 Glezen Lane  
Wayland, MA 01778  
Telephone: (508) 276-1365  
Email: alan@admlawoffice.com

Adam L. Sherr, Associate General Counsel  
CenturyLink, dba CenturyLink QCC  
1600 7<sup>th</sup> Avenue, Room 1506  
Seattle, WA 98191  
Telephone: (206) 398-2507  
Email: adam.sherr@centurylink.com

Dated: June 6, 2013

CERTIFICATE OF SERVICE

D.T.C. 13-6

I, Alan D. Mandl, certify that on this 6<sup>th</sup> day of June, 2013, I served a copy of the Motion of Qwest Communications Company, LLC d/b/a CenturyLink QCC ("CenturyLink") for Limited Participant Status by email upon the parties of record to this proceeding.

  
Alan D. Mandl