

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]³⁴

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

³⁴ Each chart contains a summary tab and a detail tab. The detail tab shows the **[[BEGIN CONFIDENTIAL]]** [REDACTED] **[[END CONFIDENTIAL]]** analysis that CenturyLink performed in order to determine Verizon's overcharges.

[REDACTED]

[REDACTED]

[[END CONFIDENTIAL]]

30. Three Verizon Operating Companies were sold to Frontier Communications
("Frontier") in April 2016 [[BEGIN CONFIDENTIAL]] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

31. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

³⁶ Ex. 40.08, CLINKFAC0168, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Dec 2013*, dated Jan. 20, 2014; Ex. 40.11, CLINKFAC0168, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jan 2014*, dated Feb. 17, 2014; Ex. 40.10, CLINKFAC0168, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Feb 2014*, dated Mar. 14, 2014.

35. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]⁴¹

36. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

³⁷ **[[BEGIN CONFIDENTIAL]]** [REDACTED]
[[END CONFIDENTIAL]] See 2009 Service Agreement, Ex. B, § 2; 2014 Service Agreement, Ex. B, § 2(w), (x).

³⁸ Ex. 40.09, CLINKFAC0168, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Feb 2014*, dated Mar. 17, 2014.

³⁹ Ex. 40.19, CLINKFAC0168, File: PY5Q4_Centurylink DS1_DS3_FMS MRC.xlsx.

⁴⁰ Ex. 40.20, CLINKFAC0168, File: PY5Q4_Centurylink DS3 CLF CLS Billed Units.xlsx.

[[BEGIN CONFIDENTIAL]] [REDACTED] **[[END CONFIDENTIAL]]**

⁴¹ **[[BEGIN CONFIDENTIAL]]** [REDACTED] **[[END CONFIDENTIAL]]**

⁴² Ex. 40.12, CLINKFAC0168, Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Feb 2014*, dated May 9, 2014.

[illegible]

⁴⁴ Ex. 40.13, CLINKFAC0168, *Email from Joseph Romero (CenturyLink) to Joseph Aguilar (Verizon), Dispute*, dated Jun. 18, 2014.

[illegible]

⁴⁹ Ex. 37.06c, CLINKFAC0186, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC083326 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Jul. 31, 2014.

40. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁵⁰ Ex. 37.01, CLINKFAC0186, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Apr 2013*, dated May 13, 2013; Ex. 37.04, CLINKFAC0186, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-May 2013*, dated Jun. 18, 2013; Ex. 37.02, CLINKFAC0186, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-PY5Q1 with disputes*, dated Jul. 25, 2013.

⁵¹ Ex. 37.02, CLINKFAC0186, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-PY5Q1 with disputes*, dated Jul. 25, 2013.

⁵² Ex. 37.02d, CLINKFAC0186, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-PY5Q1 with disputes*, dated Jul. 25, 2013.

⁵³ Ex. 37.02c, CLINKFAC0186, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-PY5Q1 with disputes*, dated Jul. 25, 2013. **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END CONFIDENTIAL]]

⁵⁴ *Id.*

41.

58

⁵⁹ Ex. 38.05c, CLINKFAC0185, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC083325 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Jul. 31, 2014.

[REDACTED]

43. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁶⁰ Ex. 38.04, CLINKFAC0185, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jun 2013*, dated Jul. 12, 2013; Ex. 38.03, CLINKFAC0185, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jul 2013*, dated Aug. 15, 2013.

⁶¹ Ex. 38.01, CLINKFAC0185, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Joseph Romero (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Aug 2013*, dated Oct. 25, 2013, at 5.

⁶² Ex. 38.01b, CLINKFAC0185, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Joseph Romero (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Aug 2013*, dated Oct. 25, 2013. **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END CONFIDENTIAL]]

44. [REDACTED]

45. [REDACTED]

68

⁶³ Ex. 38.01, CLINKFAC0185, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Joseph Romero (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Aug 2013*, dated Oct. 25, 2013.

⁶⁴ Ex. 40.01, CLINKFAC0168, Email exchanges between Tiffany Brown (CenturyLink) and Joseph Aguilar (Verizon), *RE: Dispute associated w/Credit Calculation - Verizon*, dated 2014, at 5.

⁶⁵ Ex. 38.05, CLINKFAC0185, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC083325 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Jul. 31, 2014.

⁶⁶ Ex. 38.13, CLINKFAC0185, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40794915*, dated Jul. 31, 2014.

⁶⁷ Ex. 38.11, CLINKFAC0185, File: Letter of Acknowledgement 40795381 8-5-14 zip file.

⁶⁸ Ex. 40.02, CLINKFAC0168, Email from Joseph Aguilar (Verizon) to Joseph Romero (CenturyLink), *RE: FRP Disputes*, dated Aug. 5, 2014.

[REDACTED]

46. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

47. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁶⁹ Ex. 39.05c, CLINKFAC0184, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC083324 CenturyLink - Verizon South Claim; BAN: 412M520008196, dated Jul. 31, 2014.

⁷⁰ Ex. 39.04, CLINKFAC0184, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Sep 2013 - Verizon*, dated Oct. 14, 2013; Ex. 39.02, CLINKFAC0184, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), Robert Montenegro (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Oct 2013*, dated Nov. 14, 2013; Ex. 39.03, CLINKFAC0184, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Nov 2013*, dated Jan. 2, 2014, at 3.

⁷¹ Ex. 39.03, CLINKFAC0184, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Nov 2013*, dated Jan. 2, 2014.

⁷² Ex. 39.03a, CLINKFAC0184, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Nov 2013*, dated Jan. 2, 2014.

[illegible]

⁷⁸ *Id.*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

83

[REDACTED]

⁸⁰ See ¶¶ 41, 45, 49, *supra*.

⁸² *Id.*, at 4.

83 *Id.*

⁸⁴ *Id.*, at 3.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

51. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]⁸⁷

52. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁸⁵ *Id.*, at 2.

⁸⁶ *Id.*, at 1.

⁸⁷ *Id.*, at 1-2, 4-5.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]⁸⁸

53. [REDACTED]

[REDACTED]

[REDACTED]⁸⁹

54. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁸⁸ Ex. 40.04, CLINKFAC0184, Email exchanges among Patrick Lowell (CenturyLink), Joseph Aguilar (Verizon), Joseph Romero (CenturyLink) and Tiffany Brown (CenturyLink), *RE: Disputes Associated with Verizon's credit calculation*, dated winter 2015.

⁸⁹ Ex. 40.05, CLINKFAC0184, Email exchanges between Patrick Welch (CenturyLink) and Joseph Aguilar (Verizon), *FW: CSP Dispute*, dated spring 2015.

[REDACTED]

[REDACTED]⁹¹

55. [REDACTED]

[REDACTED]

[REDACTED]⁹²

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

57. [REDACTED]

[REDACTED] **[[END**

CONFIDENTIAL]] CenturyLink and Verizon entered into the 2014 Service Agreement just prior to the expiration of the 2009 Service Agreement, allowing CenturyLink to continue to

⁹⁰ *Id.*

⁹¹ *Id.*

⁹² *Id.* at 3.

⁹³ *Id.*

purchase special access services from Verizon. Under the 2014 Service Agreement, Verizon continued its practice of improper billing and crediting.

A. **[[BEGIN CONFIDENTIAL]]** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

59. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

⁹⁴ Ex. 41.01c, CLINKFAC0376, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC105568 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Sep. 15, 2015.

⁹⁵ Ex. 41.04, CLINKFAC0376, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Mar 2014*, dated May 30, 2014; Ex. 41.03, CLINKFAC0376, File: Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Apr 2014*, dated May 30, 2014; Ex. 41.05, CLINKFAC0376, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-May 2014*, dated Jun. 30, 2014.

⁹⁶ Ex. 41.02, CLINKFAC0376, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-(PY1Q1)*, dated Sep. 3, 2014.

⁹⁷ Ex. 41.02d, CLINKFAC0376, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-(PY1Q1)*, dated Sep. 3, 2014.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

60. [REDACTED]

[REDACTED]

[REDACTED]⁹⁹

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

62. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁹⁸ Ex. 41.02b, CLINKFAC0376, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-(PY1Q1)*, dated Sep. 3, 2014.

⁹⁹ Ex. 41.06, CLINKFAC0376, Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-PY1Q1 REVISED*, dated Nov. 24, 2014, at 2.

¹⁰⁰ Ex. 41.02, CLINKFAC0376, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-(PY1Q1)*, dated Sep. 3, 2014; Ex. 41.06, CLINKFAC0376, Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-PY1Q1 REVISED*, dated Nov. 24, 2014, at 2.

[REDACTED]

[REDACTED]

[REDACTED]

63. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

64. [REDACTED]

[REDACTED]

¹⁰¹ Ex. 41.01, CLINKFAC0376, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC105568 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Sep. 15, 2015.

¹⁰² Ex. 41.07, CLINKFAC0376, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Rejected Claim - Batch Number: 40860467*, dated Sep. 15, 2015.

¹⁰³ Ex. 42.02c, CLINKFAC0377, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, Patrick Lowell (CenturyLink), *FW: CCQWC105570 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Sep. 15, 2015, with attachments.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁰⁴ Ex. 42.01, CLINKFAC0377, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jun 2014*, dated Jul. 30, 2014; Ex. 42.04, CLINKFAC0377, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jul 2014*, dated Aug. 27, 2014; Ex. 42.03, CLINKFAC0377, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Aug 2014*, dated Sep. 25, 2014.

¹⁰⁵ Ex. 42.05, CLINKFAC0377, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: CenturyLink PY1Q2*, dated Dec. 18, 2014.

¹⁰⁶ Ex. 42.05b, CLINKFAC0377, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: CenturyLink PY1Q2*, dated Dec. 18, 2014, with attachments.

¹⁰⁷ Ex. 42.05d, CLINKFAC0377, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: CenturyLink PY1Q2*, dated Dec. 18, 2014 - PY1Q2 Centurylink CLF CLS.xlsx, with attachments.

66.

¹⁰⁸ Ex. 42.05, CLINKFAC0377, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: CenturyLink PY1Q2*, dated Dec. 17, 2014.

¹⁰⁹ Ex. 42.02, CLINKFAC0377, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, Patrick Lowell (CenturyLink), *FW: CCQWC105570 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Sep. 15, 2015.

¹¹⁰ Ex. 42.08, CLINKFAC0377, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40860409*, dated Sep. 17. 2015.

[illegible]

¹¹² Ex. 43.04, CLINKFAC0378, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Sep 2014*, dated Oct. 28, 2014; Ex. 43.03, CLINKFAC0378, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Oct 2014*, dated Dec. 9, 2014; Ex. 43.02, CLINKFAC0378, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Nov 2014*, dated Jan. 6, 2015.

¹¹⁴ Ex. 43.05c, CLINKFAC0378, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *CenturyLink PY1Q3*, dated Jan. 28, 2015 - PY1Q3 Centurylink DS1 wo miles.xlsx, with attachments.

[illegible]

¹¹⁷ Ex. 43.01, CLINKFAC0378, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC105571 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Sep. 15, 2015.

[illegible]

[illegible]

¹²⁴ Ex. 44.03d, CLINKFAC0379, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Feb 2015*, dated Mar. 30, 2015, with attachments.

[illegible]

¹²⁸ Ex. 45.03, CLINKFAC0380, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Mar 2015*, dated May 15, 2015; Ex. 45.02, CLINKFAC0380, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Apr*

¹³² Ex. 45.05e, CLINKFAC0380, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *CenturyLink PY2Q1*, dated Jul. 27, 2015, with attachments.

[REDACTED]

83. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [[END CONFIDENTIAL]]

VI. CenturyLink Attempts to Navigate Verizon's Catch 22 Dispute Procedure.

84. [[BEGIN CONFIDENTIAL]] [REDACTED]

[REDACTED] [[END CONFIDENTIAL]] CenturyLink was repeatedly frustrated by Verizon's resistance to accepting, analyzing, and resolving disputes. We tried our hardest to conform to with Verizon's stated process and procedures but, as shown below, they were effectively impossible and Verizon made little or no effort to facilitate CenturyLink's disputes.

¹³³ Ex. 45.01, CLINKFAC0380, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC105573 CenturyLink - Verizon South Claim; BAN: 412M520008196, dated Sep. 15, 2015.

¹³⁴ Ex. 45.07, CLINKFAC0380, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), Verizon Claim Status Letter - Batch Number: 40860417, dated Sep. 17, 2015.

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In fact, during the course of my experiences with Verizon's dispute process, it became apparent that [[BEGIN CONFIDENTIAL]] [REDACTED]

[REDACTED] [[END CONFIDENTIAL]]

Also, Verizon did not correct the billing errors that were raised by CenturyLink quarter after quarter. Instead, it repeated the same errors and refused to process CenturyLink's detailed billing disputes.

[[BEGIN CONFIDENTIAL]]

85. [REDACTED]

[REDACTED] 136

¹³⁵ Ex. 46.01c, CLINKFAC0421, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC107917 CenturyLink - Verizon South Claim; BAN: 412M520008196, dated Oct. 29, 2015, with attachments.

¹³⁶ Ex. 46.07, CLINKFAC0421, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jun 2015*, dated Jul. 28, 2015; Ex. 46.06, CLINKFAC0421, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jul 2015*, dated Aug. 25, 2015; Ex. 46.05, CLINKFAC0421, Email from Patricia Mason (Verizon) to Anne

86.

[REDACTED]

[REDACTED]

88. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁴¹ Ex. 46.03, CLINKFAC0421, Email exchanges between Anne Grimm (CenturyLink) and Patricia Mason (Verizon), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report with Disputes-PY2Q2*, dated Oct. to Nov. 2015.

¹⁴² Ex. 46.04, CLINKFAC0421, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report with Disputes-PY2Q2*, dated Nov. 19, 2015, at 4.

¹⁴³ *Id.*, at 3.

¹⁴⁴ *Id.*

148

91.

148 *Id.*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

93. [REDACTED]

[REDACTED]

[REDACTED]

¹⁴⁹ Ex. 46.08, CLINKFAC0421, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40869124*, dated Oct. 29, 2015.

¹⁵⁰ Ex. 46.04, CLINKFAC0421, File: Correspondence from Patricia Mason (Verizon) dated November 13, 2015 **[[BEGIN CONFIDENTIAL]]** [REDACTED]

[[END
CONFIDENTIAL]]

¹⁵¹ Ex. 47.01c, CLINKFAC0469, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC112558 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Feb. 5, 2016, with attachments.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]¹⁵²

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁵² Ex. 47.05, CLINKFAC0469, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Sep 2015*, dated Oct. 26, 2015; Ex. 47.04, CLINKFAC0469, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Oct 2015*, dated Dec. 17, 2015; Ex. 47.03, CLINKFAC0469, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Nov 2015*, dated Jan. 4, 2016.

¹⁵³ Ex. 47.02, CLINKFAC0469, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report with Disputes-PY2Q3*, dated Jan. 15, 2016.

¹⁵⁴ Ex. 47.13, CLINKFAC0469, File: CONFIDENTIAL Ex. 47.13 - PY2Q3 DS1 wo Miles.xlsx.

¹⁵⁵ Ex. 47.14, CLINKFAC0469, File: CONFIDENTIAL Ex. 47.14 - PY2Q3 DS3 CLF CLS Vol.xlsx.

[REDACTED]

[REDACTED]

95. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 158

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁵⁶ Ex. 47.01, CLINKFAC0469, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC112558 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Feb. 5, 2016.

¹⁵⁷ Ex. 47.01c, CLINKFAC0469, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC112558 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Feb. 5, 2016, with attachments.

¹⁵⁸ *Id.*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

97. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 161

¹⁵⁹ Ex. 47.06, CLINKFAC0469, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: Status_SpreadSheet_40889583.xls*, dated Feb. 12, 2016.

¹⁶⁰ Ex. 48.01c, CLINKFAC0505B, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CCQWC122039 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Jul. 13, 2016, with attachments.

¹⁶¹ Ex. 48.04, CLINKFAC0505B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Dec 2015*, dated

98. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

99. [REDACTED]

[REDACTED]

[REDACTED]

Jan 22, 2016; Ex. 48.06, CLINKFAC0505B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jan 2016*, dated Feb. 22, 2016; Ex. 48.05, CLINKFAC0505B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: Centurylink (Qwest) Custom Solution Monthly Tracking Report-Feb 2016*, dated Apr. 8, 2016.

¹⁶² Ex. 48.02, CLINKFAC0505B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report with Disputes-PY2Q4 Follow Up (Credits and Debit detail)*, dated Apr. 26, 2016.

¹⁶³ Ex. 48.02a, CLINKFAC0505B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report with Disputes-PY2Q4 Follow Up (Credits and Debit detail)*, dated Apr. 26, 2016, with attachments.

¹⁶⁴ Ex. 48.02c, CLINKFAC0505B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report with Disputes-PY2Q4 Follow Up (Credits and Debit detail)*, dated Apr. 26, 2016, with attachments.

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED] 167

100. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [[END CONFIDENTIAL]]

¹⁶⁵ Ex. 48.01, CLINKFAC0505B, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC122039 CenturyLink - Verizon South Claim; BAN: 412M520008196, dated Jul. 13, 2016.

¹⁶⁶ *Id.*

¹⁶⁷ *Id.*

¹⁶⁸ Ex. 48.07, CLINKFAC0505B, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Claim Status Letter - Batch Number: 40921340*, dated Jul. 13, 2016.

VII. Verizon Fails to Respond to Informal Dispute Resolution, and CenturyLink Files Its Informal Complaint.

101. On September 9, 2015, CenturyLink escalated the disputes with Verizon.¹⁶⁹ After additional months of subsequent inquiries from CenturyLink continued to elicit no substantive engagement from Verizon, CenturyLink was compelled to request **[[BEGIN CONFIDENTIAL]]** **[[END CONFIDENTIAL]]** with Verizon on March 21, 2016 covering all the disputes to date.¹⁷⁰ CenturyLink's March 2016 dispute resolution request walked through the quarterly disputes in detail, and requested dispute resolution **[[BEGIN CONFIDENTIAL]]** **[[END CONFIDENTIAL]]** **[[END CONFIDENTIAL]]** Verizon responded over two months later on May 31, 2016, **[[BEGIN CONFIDENTIAL]]** **[[END CONFIDENTIAL]]** **[[END CONFIDENTIAL]]** **[[END CONFIDENTIAL]]** CenturyLink then filed an informal complaint with the FCC on June 17, 2016.

¹⁶⁹ See Ex. 40.07, Email from Patrick Welch (CenturyLink) to David Szol (Verizon), *FW: Dispute associated w/Credit Calculation - Verizon*, dated Sep. 9, 2015.

¹⁷⁰ See Ex. 40.22, Dispute Notice Letter from Patrick Welch (CenturyLink) to Verizon, *Re: Dispute Notice and Request for Informal Dispute Resolution*, dated Mar. 21, 2016.

¹⁷¹ See Ex. 40.23, Response to Dispute Notice Letter from David Szol (Verizon) to Patrick Welch (CenturyLink), dated May 31, 2016.

VIII. Verizon Withholds Undisputed Credits While CenturyLink Continues to Submit Claims. [[BEGIN CONFIDENTIAL]]

[REDACTED]

102. [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

173

103. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁷² Ex. 49.07a, CLINKFAC0610B, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CLINKFAC0610B Verizon FRP Credit Calculation (Mar'16-May'16) 08-17-16*, dated Jan. 11, 2017, with attachments.

¹⁷³ Ex. 49.03, CLINKFAC0610B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Mar 2016*, dated Apr. 26, 2016; Ex. 49.02, CLINKFAC0610B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Apr 2016*, dated May 25, 2016; Ex. 49.04, CLINKFAC0610B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-May 2016*, dated Jul. 6, 2016.

¹⁷⁴ Ex. 49.05, CLINKFAC0610B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: PY3Q1 Credit*, dated Aug. 1, 2016.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁷⁵ Ex. 49.05h, CLINKFAC0610B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: PY3Q1 Credit*, dated Aug. 1, 2016, with attachments.

¹⁷⁶ Ex. 49.05i, CLINKFAC0610B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *RE: PY3Q1 Credit*, dated Aug. 1, 2016, with attachments.

¹⁷⁷ Ex. 49.22, CLINKFAC0610B, Email from Bradley Rhotenberry (Verizon) to Anne Grimm (CenturyLink), *RE: PY3Q1 Credit*, dated Mar. 2, 2017, at 3.

¹⁷⁸ *Id.*

¹⁷⁹ *Id.*, at 4.

PUBLIC VERSION -- CONFIDENTIAL MATERIAL OMITTED

[REDACTED]

[REDACTED]

[REDACTED]

106. [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 182

107. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 183

¹⁸⁰ Ex. 49.06, CLINKFAC0610B, Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), *RE: PY3Q1 Credit (Revised)*, dated May 23, 2017.

¹⁸¹ Ex. 49.07, CLINKFAC0610B, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, *FW: CLINKFAC0610B Verizon FRP Credit Calculation (Mar'16-May'16) 08-17-16*, dated Jan. 11, 2017.

¹⁸² *Id.*

¹⁸³ Ex. 49.08, CLINKFAC0610B, Email from submit.claims@verizon.com to Joseph Romero (CenturyLink), *Verizon Rejected Claim - Batch Number: 40953706*, dated Jan. 12, 2017.

185

¹⁸⁵ Ex. 50.03, CLINKFAC0765B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jun 2016*, dated Jul. 26, 2016; Ex. 50.02, CLINKFAC0765B, Email from Patricia Mason (Verizon) to Anne Grimm (CenturyLink), *Centurylink (Qwest) Custom Solution Monthly Tracking Report-Jul 2016*, dated Sep. 6, 2016; Ex. 50.05, CLINKFAC0765B, Email from Bradley Rhotenberry (Verizon) to Anne Grimm (CenturyLink), *CenturyLink (Qwest) Custom Solution Monthly Tracking Report-PY3Q2*, dated Dec. 20, 2016.

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁸⁷ Ex. 50.05, CLINKFAC0765B, Email from Bradley Rhotenberry (Verizon) to Anne Grimm (CenturyLink), *CenturyLink (Qwest) Custom Solution Monthly Tracking Report-PY3Q2*, dated Dec. 20, 2016; Ex. 50.09, CLINKFAC0765B, File: PY3Q2 Centurylink DS1 0 miles.xlsx.

¹⁸⁸ Ex. 50.05, CLINKFAC0765B, Email from Bradley Rhotenberry (Verizon) to Anne Grimm (CenturyLink), *CenturyLink (Qwest) Custom Solution Monthly Tracking Report-PY3Q2*, dated Dec. 20, 2016; Ex. 50.10, CLINKFAC0765B, File: PY3Q2 Centurylink DS3 CLS_CLF Units.xlsx.

¹⁸⁹ Ex. 50.04, CLINKFAC0765B, Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), *RE: CenturyLink (Qwest) Custom Solution Monthly Tracking Report-PY3Q2 (Revised)*, dated May 23, 2017, at 3.

¹⁹⁰ *Id.*, at 2.

[illegible]

¹⁹⁴ Ex. 51.01c, CLINKFAC0766B, Email from Luann Donahue (CenturyLink) to submit.claims@verizon.com, *CCQWC134092 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Mar. 17, 2017, with attachments.

[illegible]

196 *Id.*

¹⁹⁸ *Id.*; Ex. 51.11, CLINKFAC0766B, File: PY3Q3 DS3 CLS_CLF Billed Units.xlsx.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

117. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 203

¹⁹⁹ Ex. 51.02, CLINKFAC0766B, Email from Anne Grimm (CenturyLink) to Patricia Mason (Verizon), *RE: CenturyLink (Qwest) Custom Solution Monthly Tracking Report-PY3Q3 (Revised)*, dated May 23, 2017, at 2-4.

²⁰⁰ *Id.*

²⁰¹ Ex. 51.01c, CLINKFAC0766B, Email from Luann Donahue (CenturyLink) to submit.claims@verizon.com, *CCQWC134092 CenturyLink - Verizon South Claim; BAN: 412M520008196*, dated Mar. 17, 2017, with attachments.

²⁰² *Id.*

²⁰³ *Id.*

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[REDACTED]

118. [REDACTED]

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[REDACTED]

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[REDACTED]²⁰⁵

119. [REDACTED]

[REDACTED]

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[REDACTED]

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²⁰⁴ Ex. 52.01c, CLINKFAC0797B, Email from Joseph Romero (CenturyLink) to submit.claims@verizon.com, FW: CCQWC136216 CenturyLink - Verizon South Claim; BAN: 412M520008196, dated Apr. 21, 2017, with attachments.

²⁰⁵ Ex. 52.14, CLINKFAC0797B, Email from Bradley Rhotenberry (Verizon) to Anne Grimm (CenturyLink), *RE: CenturyLink (Qwest) Custom Solution - PY3Q4 (Revised)*, dated Feb. 14, 2018, at 4-5.

²⁰⁶ *Id.*

²⁰⁷ *Id.*; Ex. 52.06, CLINKFAC0797B, File: PY3Q4 CLink DS1 with 0 miles.xlsx.

[illegible]

²⁰⁹ Ex. 52.14, CLINKFAC0797B, Email from Bradley Rhotenberry (Verizon) to Anne Grimm (CenturyLink), *RE: CenturyLink (Qwest) Custom Solution - PY3Q4 (Revised)*, dated Feb. 14, 2018, at 4-5.

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