October 1, 2010

Washington
UT-100820
INTEGRA TELECOM 2-165

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 165

Is the interface that Qwest currently uses to process LSRs for CLECs a UOM
interface? If so:

a.   Identify the interface;

b.   State your basis for asserting that the interface is UOM compliant,
consistent with ATIS guidelines or standards;

c.   Provide Qwest documentation dated or posted before the Merger
Announcement Date (April 21, 2010) indicating that the interface is UOM
compliant.

RESPONSE:

   IMA is not UOM compliant, per se.   IMA has its own XML Gateway and does
   accept XML files for LSR preorder transactions and order submission.
   The XML Gateway is based on an earlier version of the LSOG guidelines
   and has been supplemented with some, but not all, changes contained in
   subsequent versions of the industry LSOG. Additionally, Qwest's XML
   Gateway contains non-industry preorder and order fields and/or values
   based on CMP approved change requests.

   a. N/A

   b. N/A

   c. N/A

   Respondents: Tracy Strombotne
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               Wayne Spohn

   Witness: TBD