

Washington Docket No. UT 100820
Response to Integra Data Request No. 172
Response Date: October 1, 2010

Integra Data Request No. 172:

Does CenturyLink or the system called EASE currently impose volume or other limitations that require a CLEC to submit its service request manually (e.g., via facsimile or via e-mail) for an order type typically accepted by the EASE system? For example, the EASE System may normally process a Number Port order type but it may not allow the CLEC to submit a range of Direct Inward Dials (DIDs) on a single order in EASE and therefore requires a CLEC to manually submit that Number Port order. Additionally, if any orders are treated as a project, please describe the criteria for the project (e.g., number of telephone numbers for which CenturyLink requires project handling) and state whether orders treated as a project are submitted via EASE or manually. In any case, identify if any aspect of the processing of the order is manual.

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous, overbroad and imprecise.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink does not impose a volume limit on the number of orders placed through the EASE system. Large orders of several hundred numbers are typically treated as a project. All projects can be submitted electronically through EASE. There are no requirements to submit a manual order for a project.

CenturyLink defines a project as a planned event where terms and conditions for the work performed is agreed upon by both the Wholesale Customer, CenturyLink and any other party engaged in the provisioning process. To allow for successful turn-up or conversion of services/facilities, each party must negotiate, in good faith, the timelines that allow required activities to be met, equipment ordered, placed and tested to meet the overall objectives of the project. The timeline must meet the rule of reasonable and prudent business practices.

Generally speaking, criteria used when working orders as a project for designed services are:

- Over 10 T-1s
- 3 or more DS-3s
- 25 or more designed DS0s
- Over 240 Switched Trunks
- CFA Rolls

Sonet local services will be coordinated in a separate process.

General criteria used when working orders as a project for non-designed services are:

- Resale (New Install/Convert/Migrations) 25
- UNE-P (New Install/Convert/Migrations) 25

- Loop (Install/Convert) 25
- Port (Port Lines) 200

Each individual project is by definition negotiated and coordinated with the customer. Questions regarding project coordination and determination should be referred to the customer's account manager.

Sponsor: Melissa Closz, Director Wholesale Operations