UTC STAFF DATA REQUEST NO. 86:

Please provide an overview of CenturyLink's wholesale operations, and compare and contrast CenturyLink's OSS with Qwest's.

RESPONSE:

<u>Overview of CenturyLink's Wholesale Operations</u>

CenturyLink's Wholesale Operations is organized around five functional areas: 1) product management and marketing; 2) wholesale operations; 3) national public access; 4) wholesale sales and account management; and 5) CLEC management and service reporting.

<u>Product Management and Marketing</u>
The product management and marketing group is responsible for the development and implementation of all wholesale products including CLEC services such as resale, Local Wholesale Service (CTL's unbundled network element – platform product), unbundled network elements, collocation, etc.

<u>Wholesale Operations</u>
The wholesale operations group is responsible for CTL's wholesale OSS system called EASE and its operation centers in Decatur, Indiana, Leesburg, Florida, Wentzville, Missouri and La Crosse, Wisconsin.

<u>National Public Access</u>
The national public access group is responsible for management of CTL's public payphones as well as payphone services provided to state, county and local correctional facilities across the country.

<u>Wholesale Sales and Account Management</u>
The wholesale sales and account management group is responsible for the direct sales of CTL's data and special access products, sales engineering and account management to non-CLEC wholesale customers. This includes both in-territory sales and out-of-territory sales on CTL's 15,000 route mile fiber optic facilities.

<u>CLEC Management and Service Reporting</u>
The CLEC management and service reporting group is responsible for managing the ICA negotiations process, the implementation of the ICAs, account management and in-territory sales to CLEC wholesale customers. In addition, this group is responsible for managing revenue assurance, jurisdictional compliance, reciprocal compensation/access expense and performance service reporting for special access and CLEC service across the CTL 33-state territory.

CenturyLink Qwest OSS

CenturyLink utilizes a system called EASE to process both access service requests (ASRs) and local service requests (LSRs). EASE provides all pre-ordering and ordering functionality and provides the carrier with the ability to track the status of their orders throughout the provisioning process. EASE provides wholesale customers with both a web based GUI 15 (graphical user interface) as well as electronic data interface options to allow flexibility to our customers in placing orders with CenturyLink. In addition, the system utilizes a workflow management platform to provide centralized and automated control of all workflow steps required to complete each provisioning request.

Relative to maintenance and repair, CenturyLink provides CLECs with access to WebRRS, via the wholesale website, as a means to report and track trouble tickets or CLECs have the option of utilizing "800" access numbers to reach the appropriate repair center.

Qwest OSS

Qwest has developed and provides OSS functions using electronic gateways and manual processes. These gateways act as a mediation or control point between CLECs' and Qwest's OSS. These gateways provide security for the interfaces, protecting the integrity of the Qwest systems and databases. Qwest makes the following electronic access options available to CLECs:

Interconnect Mediated Access ("IMA") - IMA provides pre-ordering and ordering/provisioning functions for all local competitive products that are ordered via Local Service Requests ("LSRs"). IMA provides both a Graphical User Interface ("GUI") and an application-to-application option using Extensible Markup Language ("XML").

Qwest Online Request Application ("QORA") - QORA supports ordering for all wholesale products ordered via an Access Service Request ("ASR"). QORA provides CLECs with a GUI interface, or CLECs' systems can submit ASRs via QORA's Network Data Mover ("NDM") and Unified Order Model ("UOM") gateways.

Customer Electronic Maintenance and Repair ("CEMR") - CEMR is Qwest's GUI that provides CLECs with maintenance and repair functions for their existing products and services. CEMR allows CLECs to perform trouble administration activities such as creating and editing trouble reports, monitoring trouble report status and reviewing trouble history.

Mediated Access Electronic Bonding Trouble Administration ("MEDIACC – EBTA") – MEDIACC EBTA provides CLECs with the ability to perform maintenance and repair functions in their own systems. MEDIACC EBTA is the electronic gateway that CLECs' systems use to communicate with Qwest's systems.

Respondent: Mike Hunsucker, CenturyLink
Chris Viveros, Qwest
Response Date: June 25, 2010

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Respondent: Mike Hunsucker, CenturyLink
             Chris Viveros, Qwest
Response Date: June 25, 2010

SUPPLEMENTAL RESPONSE:

CenturyLink has no other wholesale OSS systems beyond those included in its initial response to this request.

Respondent: Mike Hunsucker
Response Date: August 26, 2010