

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION  
DOCKET NO. UT-100820  
CENTURYLINK RESPONSES TO  
INTEGRA'S FIRST SET OF INFORMATION REQUESTS  
NOS. 1 THROUGH 156**

18. Have any of CenturyLink's OSS or back-office platforms been third-party tested (i.e., similar to third-party testing that was conducted on BOC systems during the 271 approval process using commercial volumes)? If so, identify the systems/platforms, the third-party tester, the state in which testing occurred, and any testing reports/results.

**CenturyLink Response:**

CenturyLink performs extensive testing of its OSS and back office platforms prior to modifications or new implementations. Upon successful completion of testing, CenturyLink has used a phased approach to implementation where applicable, migrating customers in phases to further mitigate customer risk and minimize any impact to customer service. Also, where applicable, platforms that are being retired have been left active for customer use while the transition to the new platform is underway. This provides additional stability to the operational environment by providing a redundant processing capability for customers. Prior to such transitions, customer training is conducted and on-line training is available via the CenturyLink website. A Help Desk is available on an on-going basis to support customers who require additional assistance as are staff members who have subject matter expertise on Wholesale support systems. While CenturyLink has not conducted third-party testing of its systems, it consistently utilizes rigorous and consistent testing standards.

Sponsor: Melissa Closz, Director Wholesale Operations