

Docket No. UT-100820
Response to UTC Staff Data Request No 151
Respondent: John Felz
Witness: Todd Schafer
Response Date: October 19, 2010

UTC STAFF DATA REQUEST NO. 151:
Re: Systems Integration

Please explain in detail any operational problems that have been encountered arising from CenturyLink's integration of Embarq. Please include details of what systems were involved and the details of how the problems were/are being resolved.

OBJECTION:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written and, as such, is not relevant or likely to lead to the discovery of admissible evidence in this proceeding. In addition, CenturyLink objects to this request to the extent it applies to matters other than Washington intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE:

During the recent conversion of the North Carolina market to the CenturyLink billing and operational systems, some of the outside plant records were loaded incorrectly to the service provisioning system (called MARTENS). The way in which plant was constructed in the legacy Embarq areas was not consistent between areas and not consistent with the legacy CenturyTel area. As a result, records for some of the devices initially did not load correctly in the conversion and in some cases, technicians needed to contact centralized work groups and take additional steps to get information necessary to complete assigned service orders and trouble tickets.

CenturyLink identified that approximately 2,000 out of approximately 11,500 devices did not load correctly during the North Carolina conversion. At this time, the records for approximately 95% of those 2,000 devices have been fixed and CenturyLink continues to work diligently on the remaining 5%.

With the integration of large, complex systems, some issues are expected to arise, but CenturyLink works hard during every integration process to minimize the number and severity of those problems, and to mitigate any potential negative impact on the Company's customers and employees. Now that CenturyLink is more fully aware of the differences in outside plant records, CenturyLink is taking additional steps to identify and to correct those plant records before subsequent conversions take place. For instance, CenturyLink has identified those devices that may be at a higher risk for having incorrect plant records and is going to have

technicians test those devices to determine if there are any problems. In proactively implementing these additional steps, CenturyLink is confident that it will minimize potential problems in future conversions.