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December 10, 2010

VIA ELECTRONIC FILING   **EX PARTE**

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **Applications Filed by Qwest Communications International
      Inc. and CenturyTel, Inc., d/b/a CenturyLink for Consent to
      Transfer of Control, WC Docket No. 10-110**

Dear Ms. Dortch:

        PAETEC Holding Corp., on behalf of its operating subsidiaries, PAETEC
Communications, Inc., US LEC, and McLeodUSA Telecommunications Services,
L.L.C. (collectively "PAETEC"), submits this letter to address the abbreviated
arguments raised in an ex parte letter submitted by CenturyLink, Inc. and Qwest
Communications International Inc. (collectively "Applicants") on November 8,
2010. Applicants submitted their November 8 ex parte in response to an ex parte
filed by PAETEC on October 22, 2010. This letter supplements comments filed
on July 12, 2010, by PAETEC and 11 other CLECs ("Joint Commenter
Comments") and PAETEC's October 22, 2010 ex parte.

        When Century Tel proposed to merge with Embarq in 2008, it voluntarily
agreed to migrate to the more advanced Embarq operational support systems
("OSS") on a company-wide basis to secure regulatory approval of the
transaction. It was unquestioned that the Embarq OSS was more advanced than
the antiquated systems and processes historically used by Century Tel in its much
smaller exchanges in which Century Tel was only required to support
significantly smaller volumes of wholesale ordering and repair activities.
Although the Embarq OSS had not been vetted via third party testing, or formally
sanctioned by the FCC as meeting Embarq's obligation to provide CLECs
nondiscriminatory access to the ILEC's underlying OSS, CLECs were generally
amenable to allowing CenturyLink to migrate to a better OSS offered by EASE.
Indeed, advocating that CenturyLink should be required to offer a more robust
OSS than EASE would have been rejected out of hand since neither ILEC by
itself nor even on a combined basis were subject to 271 obligations as were the
larger regional Bell Operating Companies.

        Less than a year after that deal closed, CenturyLink announced plans to
acquire Qwest, which also has its own OSS. However, unlike the Embarq OSS,

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the Qwest OSS had been (a) subjected to rigorous third party testing, (b) found by the FCC to provide CLECs nondiscriminatory access to the ILEC's back office systems and databases, and (c) found by the FCC to meet Qwest's 271 obligations. Yet, CenturyLink has utterly balked at offering the identical commitment to adopt the more advanced OSS on a company-wide basis that it offered less than two years prior, and has not even been willing to make the lesser commitment of *retaining* the more advanced OSS where it currently exists.

Initially, the Applicants responded to requests for an OSS commitment by claiming that decisions about future OSS had not yet been made.[1] When various parties identified limitations of the EASE system, CenturyLink challenged a limited number of claims, maintaining that EASE was comparably functional in several respects to the Qwest OSS. When PAETEC provided additional facts undercutting the Applicants' claims of comparable functionality and identifying additional limitations, the Applicants' primary response was to promote a settlement reached with one CLEC, rather than attempting to counter PAETEC's showing that EASE was an inferior OSS compared to that of Qwest.

In their November 8 ex parte, the Applicants characterize PAETEC's concerns about potential OSS degradation in Qwest areas as mere "conjecture." This reverses the burden of proof, which should be on Applicants to show that there will not be degradation. In light of Applicants' refusal to commit to retain Qwest's OSS and their repeated statements that they will not decide which of the Applicants' OSS to keep until after the merger closes, the burden should be on Applicants to show that if they decide to replace Qwest's OSS with CenturyLink's EASE, OSS degradation in Qwest territory will not result.

Even though the burden is not on PAETEC to show that EASE is inferior in important respects to Qwest's OSS, PAETEC believes that it can carry that burden. Applicants assert that PAETEC's claims about the inferiority of EASE are mere "speculation" because PAETEC has chosen not to e-bond with EASE.[2] Applicants' suggestion that its lack of e-bonding with EASE undermines PAETEC's claims that EASE is inferior is typical misdirection. The fact that PAETEC is not directly e-bonded with EASE does not mean, as implied by Applicants, that claims that EASE is an inferior OSS are mere speculation. PAETEC uses a third party provider which is e-bonded with EASE to submit

[1]   Lack of certainty about what the OSS would be in the future did not stop CenturyTel from making a commitment when merging with Embarq.

[2]   Applicants' 11-8-10 Ex parte at 2, n.4.

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orders in various legacy Embarq exchanges. Attached as Exhibit A is a detailed
schedule denoting the functionalities of the Qwest OSS used by PAETEC today,
and the comparable functionalities (or lack thereof) offered by EASE today.
PAETEC has verified the accuracy of the information set forth in Exhibit A
regarding the functionality of EASE with its account representative of the third
party service bureau that is e-bonded with EASE to submit orders on behalf of
PAETEC.[3]

As Exhibit A details, Applicants' suggestion that EASE is comparably
functional is factually inaccurate. The bulk of the functionality available in the
Qwest OSS is non-existent in EASE *using e-bonding*; further not all functionality
offered by the Qwest OSS is even available in EASE when accessing the EASE
User Interface manually. For example, in PAETEC's July comments, PAETEC
noted that the Qwest IMA provides real time order processing, whereas EASE
does not. In their Reply Comments filed in August, the Applicants said that this
claim was "false." However, as detailed in Exhibit A, EASE offers only "batch"
order processing even when e-bonded, which is not real time order processing as
in flow-through processing for LSRs. With respect to pre-order functions, EASE
does not currently offer any pre-order functions for LSRs or ASRs. EASE
address validation, which EASE claims is a pre-order function, is a selection
offering *once an order is opened*. Furthermore, the Qwest IMA allows the pre-
order function of address validation using various selection options as drop-down
menus. EASE has no helpful guides to assist a CLEC so a CLEC is required to
input the address exactly as it appears in the EASE system (*e.g.*, abbreviating
directions, such as north and west, or street and avenue; spelling out numbers or
using digits; etc) to get a match. Thus, if the customer does not provide its
address as recorded in EASE, the CLEC will be unable to validate the customer's
address. Additionally, the Qwest IMA saves the validated address so that it can
automatically populate an LSR with the validated address. EASE offers no such
functionality.

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[3]   Discovery responses provided by Integra confirm that it does not have the
sophisticated back office functionality that PAETEC has and would not have the same
concerns about EASE that PAETEC has. (Exhibit B). Instead, Integra uses manual
processes to complete various steps in pre-order, order submission, trouble ticket
management and billing that PAETEC has automated. Integra's reliance on manual
processes means should future changes to the Merged Company OSS degrade the
functionality, access and robustness of the e-bonding capabilities, that would not impact
Integra to the degree that such changes could impact the automated processes used by
PAETEC.

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EASE also does not allow a CLEC to access to CenturyLink's Customer Service Records electronically, whereas the Qwest IMA does offer this functionality. Thus, while the Qwest OSS allows PAETEC to download CSR information directly into its back offices system for use in sales, order preparation, and establishing a customer's account in its various systems, EASE offers no such functionality.

The Qwest IMA also enables a CLEC to confirm on a pre-order basis that certain services and products are able to be offered at a prospect's address. In EASE, "service availability" is only ascertained *after* a CLEC has submitted an actual order. The lack of any pre-order functions in EASE means a CLEC is forced to incur the cost and time of submitting an actual order only to potentially learn that the CLEC cannot serve the customer's location.

The list of comparative functions lacking in EASE is extensive, as detailed in the attached Exhibit A. That Applicants would continue to argue that the functionality of EASE is comparable to the Qwest OSS is troubling in light of the vague language concerning promises of comparable functionality set forth in the Integra settlement.

In multiple state proceedings, Applicants have claimed that their OSS commitment as written in the settlement with Integra will protect the interests of PAETEC in retaining its ability to continue using its internal automation allowing 'flow-through' 'real time' processing of orders and data and trouble tickets. In particular, Applicants argue that since they commit to provide wholesale service quality that is not materially less than that provided prior to closing, including "functionality," CLECs such as PAETEC will be adequately protected by this commitment. Yet the language in the Integra settlement does not ensure that the systems will be able to interface/communicate with each other in a comparable manner and to the same degree as currently exists. As a result, there is no commitment that Applicants, by converting to EASE, will not render useless PAETEC's automation efficiencies. Applicants' commitment as written is too vague to be enforceable. Thus, it is not adequate without more specificity, and to date, Applicants have been unwilling to add more specificity to its commitment.

The vagueness of the current commitment is made all the more concerning given Applicants' repeated claims in this record (and in state proceedings) that EASE *is* comparably functional to the Qwest OSS today. Such claims have been made despite numerous shortcomings identified by CLECs, including Integra. If Applicants are willing to represent to this Commission that EASE is comparably functional to the Qwest OSS today, one must assume that the Merged Entity will make similar claims whenever it seeks to migrate away from the Qwest OSS in

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the future. Clearly, what Applicants view as comparable functionality to the Qwest OSS is miles apart from what CLECs view as comparable functionality.

Additionally, the Applicants' commitment as written does not specifically address that part of "functionality" that cannot be materially degraded is functionality of the automation of a CLEC's own back office systems enabled by the current Qwest OSS e-bonding capabilities and access to Qwest databases. If the Merged Entity migrates to a new OSS that does not allow PAETEC to retain the same level of its pre-order, order, trouble ticket maintenance automation and data and database updates, then the loss of functionality of such an OSS will severely hamper PAETEC's operations. The commitment regarding "functionality" as written is tied to the enabling Merged Entity's wholesale performance level to not be materially less than Qwest's performance today. While the Merged Entity's wholesale performance may not degrade due to an OSS change on its side of the transaction, if the e-bonding provided does not afford the same ability to retain the automation in its own systems, a CLEC's operations will be severely hampered by such changes.

Moreover, the commitments in the Integra settlement mention nothing with respect to maintaining the functionality at the same cost to CLECs. Today, the Qwest OSS e-bonding allows PAETEC to download a variety of information, including databases. There is no separate charge for this functionality or download by Qwest. Even if the current commitment is clarified to ensure that CLECs will retain the ability to continue making database downloads into their own back office systems using the e-bonding capabilities, nothing in the commitment would prevent the Merged Entity from instituting substantial fees that render the access useless by making it financially prohibitive for a CLEC to access the data, revamp internal systems, processes, or both. Without such explicit protection, the efficiencies in automation in which CLECs have invested will be lost for a CLEC that has invested in automation of its own back office systems.

Please do not hesitate to contact me at (202) 373-6553 if you have any questions or concerns.

Very truly yours,

s/ *electronically signed*

Eric J. Branfman

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Qwest OSS Support v. CTL EASE Support

Qwest - Operation Support System (OSS) Production Support | CenturyLink / Embarq - Comparable System/Application - *Unknown*

Qwest - Operation Support System (OSS) Production Support	EASE: GUI	EASE: Electronic Interface	CTL/Embarq Unknown Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
This is a helpdesk support function for all the OSS applications and systems. Usually accessed via phone call, so *Real Time.*				
Description: Information about Event and Systems Notifications & Process, the latest Events that may be occurring, Systems Notifications, how to escalate technical issues, and other Wholesale Systems Help Desk related information				
Availability: AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY				
Login Requirements Digital Certificate Requirements to access Userid/Password Aministrator to manage company users				
Functions:			**Functions:**	
Event Notifications -Outages of all Qwest Systems impacting CLECS			Yes	
System Notifications - Current and future OSS functionality changes that affect CLECs			Yes	
Technical Escalation Process -This process defines how technical issues may be escalated by representatives from Qwest or the CLECs. It provides for assignment of escalated issues to designated Escalation Management Contacts. This process addresses escalations of technical issues associated with Wholesale Systems business functionality. Representatives of Qwest or the CLECs may request escalations. The process covers activities beginning with an escalation request and ending with escalation termination			Yes	
- Download Techanical Escalation Contact List			No	Information is available, but it is not available as a download.
- Download Qwest and Competive Local Exchange Carrier (CLEC) escalation of Technical Issue Process			No	Information is available, but it is not available as a download.
LFACS AN Conversion Schedule			No	Information no available
Support Information Downloads			Unknown	
Download Instructions for subscribing to Qwest System Event Notification.			No	Information is available, but it is not available as a download.
Download CMP approved Notification Intervals and Severity Levels			No	Information is available, but it is not available as a download.

Qwest OSS Support v. CTL EASE Support

Qwest - Operation Support System (OSS) Production Support

CenturyLink / Embarq - Comparable System/Application - *Unknown*

This is a helpdesk support function for all the OSS applications and systems. Usually accessed via phone call, so *Real Time*.

	EASE: GUI	EASE: Electronic Interface	CTL/Embarq Unknown Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
Support:				**Support:**
			Yes	

Information Technologies Wholesale Systems Help Desk (IT-WSHD)
The IT-WSHD supports CLECs that are in production who have questions regarding connectivity issues, outputs, and system outages. They do not support functional ("how to") questions concerning systems or applications. The IT-WSHD serves as your single and first point of contact. If the IT-WSHD is unable to assist you with a question, they will refer the information to the proper subject matter expert (SME), who will contact you directly or pass the resolution information to the IT-WSHD. The Help Desk professional will then call you to provide the information and confirm resolution.

Qwest IMA vs CTL EASE

Qwest - Interconnect Mediated Access (IMA)	EASE-GUI LSR	EASE-Electronic Data Interface (EDI) LSR**	CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO) — Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column (LSRs are processed in batch rather than real time. The time interval is determined by mutual agreement of the parties.)
Description: IMA enables CLECs to facilitate ordering Qwest Resold and Unbundled Network Element (UNE) services.			**Description:** PAETEC (LM) system(s) are currently e-bonded directly with Qwest's systems via IMA-XML for LSRs. *Real time*.
Availability: AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY			
Login Requirements Digital Certificate Requirements to access IMA; User ID/Password; Administrator to manage company users			**Login Requirements** User ID and Password; Administrator to manage company users
Electronic Access IMA-GUI for LSRs - Web Access requiring user input and retrieval between company applications	Yes	Yes	**Electronic Access** EASE-GUI for LSRs - Web Access requiring user input and retrieval between company applications
IMA-XML for LSRs - Web based application used in the electronic-bonding of companies' OSS, meaning that the separate company systems are connected and exchange information directly without a user interface. Flow-through communication between companies' systems is real time.	No	No	EASE-EDI (Electronic Data Interface) for LSRs -- This is the electronic-bonded option for CenturyLink's EASE application.** Legacy PAETEC (LP) is electronically bonded using 3rd Party vendor. 3rd Party vendor uses an FTP connection to transmit LSRs. LSRs are processed in batch rather than real time, and the batch time interval is determined by mutual agreement of the parties. (For PAETEC LSRs, it is every 20 minutes.)
Manual forms - can be exchanged via facsimile	No	No	
Pre-Order functions AVQ- Address Validation — The following lists the various means available for search - Validate by Street Address - with drop down menus	Yes	No*	**Pre-Order functions** Address Validation -- May be executed within EASE via the Pre-Order Request or within the Local Service Request (LSR) on the End User form
- Validate by Street Address zipcode/cala	Yes	No*	Validate by Street Address - must be input exactly as in system to get a match. No drop down menus to assist
- Validate by Telephone Number	No	No*	
- Provides (LSO) Local Serving Office	No	No*	
- Provides for working left in	No	No*	
- IMA saves the address so that you can select it from a list of validated addresses on the LSR forms	No	No*	
- The information may be previewed and emailed to the user	Yes	No*	- The information has to be saved by The user in order to use on The order; - information may be printed
CSR- Customer Service Records The following lists the search options available	No	No*	
	Yes	No*	CSR- Customer Service Records

Qwest IMA vs CTL EASE

Qwest - Interconnect Mediated Access (IMA)	CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)		Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column (LSRs are processed in batch rather than real time. The time interval is determined by mutual agreement of the parties.)
	EASE-GUI LSR	EASE-Electronic Data Interface (EDI) LSR**	
PAETEC (LM) system(s) are currently e-bonded directly with Qwest's systems via IMA-XML for LSRs. _Real time_.			
- Partial or Full CSRs	No	No*	
- Virtual CSR - reflects any pending orders	No	No*	
- Listing, Billing and Service Equipment, Pending Order Tabs	No	No*	
- Previewed or emailed	No	No*	
- Retrieve CSR by Telephone Number or Circuit ID (ECCKT)	No	No*	
Service Availability -- IMA Service Availability allows CLECs to confirm that products, services, and/or long distance carriers requested by your end-user are offered at the end-user's location and in Qwest's CO Switch. - Features, services, carriers (Pic) and which switches are available	No	No*	Service Availability is not a Pre-Order function. Rather, Service Availability is part of the Ordering function, so there are no means for LEC to identify necessary information, if anything, prior to ordering.
CFA Availability - can search for availability using the following methods/criteria:	Yes	No*	CFA Availability
- Check whether facilities to support them are available between the central office and the customer premise	Yes	No*	
- Designed and digital (HICAP) services	No	No*	
- Information may be previewed and emailed	No	No*	
Network Channel (NC)/Network Channel Interface (NCI) Codes Validation -- _available for LSR via IMA GUI only_	No	No*	
Billing Account Number (BAN) Validation -- _available for LSR via IMA GUI only_ IMA-GUI offers a list of BANs for each corporate identifier (known as RSID/ZCID). See IMA User Guide, p. 178 at http://www.qwest.com/wholesale/downloads/2010/100862/iMAUG_280_080210.pdf	Yes	No*	
Schedule Appointment -- The Schedule Appointment Function allows the CLEC to select the date and time to have a Qwest technician dispatched for premises or non-premises work. - Batch Hot Cut (BHC) - BHC process allows the migration of existing analog services (e.g., Resale) to unbundled local loops (2-wire or 4-wire analog voice grade) in a batch mode if the current facilities can be reused.	No	No*	
Reserve Telephone Numbers -- IMA offers CLEC several options for requesting/reserving Telephone Numbers	Unknown	No*	EASE-GUI: Reserving Telephone Numbers are _not part of the Pre-Order function_ and, though reserving TNs appears to be available in EASE, it is unclear as to when or how to access this capability.

Qwest IMA vs CTL EASE

Qwest - Interconnect Mediated Access (IMA)	CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)		
	EASE-GUI LSR	EASE-Electronic Data Interface (EDI) LSR**	Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column (LSRs are processed in batch rather than real time. The time interval is determined by mutual agreement of the parties.)
PAETEC (LM) system(s) are currently e-bonded directly with Qwest's systems via IMA-XML for LSRs. _Real time_.			
- Select one or more of the TNs offered	No	No*	
- Exchange the TNs offered	No	No*	
- Reject the TNs offered	No	No*	
Check Facility Availability	No	No	
- Requested by address and/or TN	No	No*	
- Pots Facility Request	No	No*	
- # of Lines currently working at location	No	No*	
- Dual service availability	No	No*	
- Number of lines requested	No	No*	
- Status - Available, Held	No	No*	
- Whether a dispatch is required	No	No*	
- Products not supported	No	No*	
- Number of pending orders	No	No*	
- Order Number for pending orders	No	No*	
- Due date(s) for the pending orders	No	No*	
Validate CFA	No	No*	
View DLR -- _This function is utilized by PAETEC (LM) for LSRs. PAETEC (LM) uses it for ASRs only_ --	n/a	No*	EASE-EDI: This function is available as an Order function for LSRs, but is _not a Pre-Order function_ .
Raw Loop Data -- Refers to transmission path from the Qwest Central Office (CO) Distribution Frame, or equivalent, to the loop demarcation point at the end-user premises.	No	No*	
Meet Point Query -- allows you to validate details (e.g., end-user account information, facility and service availability, addresses, loop qualifications) prior to submitting service requests and avoids unnecessary errors and/or delays of your request.	No	No*	
Loop Qualification -- CLECs use the Loop Qualification option to **prequalify a requested circuit**. By making inquires against the existing telephone number or service address, CLECs can determine whether it meets ADSL specifications and whether a loop qualifies for different types of xDSL service. • Can obtain Loop Retrieval information by: Street Address, Telephone Number, Circuit ID (ECCKT). And it identifies:	No	No*	Loop Qualification is _not a Pre-Order function_. Rather, it is part of the Ordering function, so there are no means for CLEC to identify what is available, if anything, prior to ordering.

Qwest IMA vs CTL EASE

Qwest - Interconnect Mediated Access (IMA)	CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)		Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column (LSRs are processed in batch rather than real time. The time interval is determined by mutual agreement of the parties.)
	EASE-GUI LSR	EASE-Electronic Data Interface (EDI) LSR**	
PAETEC (LM) system(s) are currently e-bonded directly with Qwest's systems via IMA-XML for LSRs. _Real time_.			
- Whether the loop is copper or pair gain	No	No*	
- Whether there are bridged taps or load coils on the loop	No	No*	
- Whether the loop should be moved to copper to be unbundled	No	No*	
• Loop Qualification for the following products used by PAETEC: - Unbundled Asymmetric Digital Subscriber Line (ADSL)	No	No	
Ordering			**Ordering**
Auto-fill or Pre-Populate LSR - Customizes contact information for users by auto-populating data to the order	No	N/A	Re: EASE-GUI: If the data accessed prior to Ordering was not saved previously by user, then user must re-input data again. Any data gathered prior to Ordering must be saved
Post Order Responses to LEC system: These are _real-time_ flow-through automatic reponses to Orders between the Qwest and PAETEC (LM) systems - _real time_ (responses returned within seconds). Below is a sampling of a list:	No	Yes - batch time only	EASE-GUI: PAETEC User must access EASE-GUI periodically to search and find response. System does not notify us or update our system when a response is available. EASE-EDI: These responses are provided in _batch_, and not real time.
ACK - Acknowledgement	No	Yes - batch time only	EASE-GUI: PAETEC User must access EASE-GUI periodically to search and find response. System does not notify us or update our system. EASE-EDI: These responses are in batch, and not real time.
FOC - Firm Order Confirmation	No	Yes - batch time only	EASE-GUI: PAETEC User must access EASE-GUI periodically to search and find response. System does not notify us or update our system. EASE-EDI: These responses are in batch, and not real time.
COM - Completion	No	Yes - batch time only	EASE-GUI: PAETEC User must access EASE-GUI periodically to search and find response. System does not notify us or update our system. EASE-EDI: These responses are in batch, and not real time.
BCN - Billing Completion Notification	No	Yes - batch time only	EASE-GUI: PAETEC User must access EASE-GUI periodically to search and find response. System does not notify us or update our system. EASE-EDI: These responses are in batch, and not real time.
911/E911 Ordering - this service is available via e-bonding. However, Qwest uses a 3rd party vendor database, _Intrado_. • with this application, able to:	No	No*	
- perform inside searches by address	No	No*	
- perform TN look-up for our PAETEC customers	No	No*	
• Address discrepancies identified by Intrado are sent to CLEC through the Qwest Intrado application for investigation and resolution.	No	No*	

Qwest IMA vs CTL EASE

Qwest - Interconnect Mediated Access (IMA)	CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)		
	EASE-GUI LSR	EASE-Electronic Data Interface (EDI) LSR**	Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column (LSRs are processed in batch rather than real time. The time interval is determined by mutual agreement of the parties.)
PAETEC (LM) system(s) are currently e-bonded directly with Qwest's systems via IMA-XML for LSRs. _Real time_.			
• Daily and Quarterly MSAG record updates provided through the Qwest Intrado database download.	No	No*	EASE-GUI and EASE-EDI do not provide database and record updates via system downloads. Rather, CenturyLink will provide MSAG updates via email to designated contacts who must update our system separately.
• CLEC corrections to 911 or MSAG records are submitted via the 911/E911 application.	No	No*	CLEC corrections to 911 or MSAG records are submitted manually via email to CenturyLink.
Ordering Types - _of which PAETEC avails itself_			**Ordering Types**
- Unbundled Loops	Yes	No*	Re EASE-EDI: Though the guide indicates that this is available, the Ordering function for these products have not been implemented yet.
- Local Number Portability	Yes	Yes*	
- Loop with Number Port	Yes	No*	Re EASE-EDI: Though the guide indicates that this is available, the Ordering function for these products have not been implemented yet.
- Directory Listing	Yes	Yes*	
- Resale POTS	Yes	No*	Re EASE-EDI: Though the guide indicates that this is available, the Ordering function for these products have not been implemented yet.
- Resale ISDN	Yes	No*	Re EASE-EDI: Though the guide indicates that this is available, the Ordering function for these products have not been implemented yet.
- Unbundled Analog Line Side Switch Port	No	No*	
- UNE-P ISDN BRI	No	No*	
- UNE-P PRI ISDN Facility	No	No*	
- UNE-P PRI ISDN Trunk	No	No*	
- EEL/UNE Combination	Yes	No*	Re EASE-EDI: Though the guide indicates that this is available, the Ordering function for these products have not been implemented yet. Re EASE-EDI: Though the guide indicates that this is available, the Ordering function for these products have not been implemented yet.
- Resale Centrex	Yes	No*	
Order support IMA-XML and IMA GUI _Clean Order Edits edits prior to submitting the order_ which increases efficiency by reducing time, resources and costs	No	Yes*	**Order support** EASE-GUI: Error codes - _available to CLEC after the order has been submitted_ and reviewed by EASE, which then requires a supp order to correct
Local Service Ordering Guidelines -LSOG	Yes	Yes*	LSOG 10 BRMS Custom Rules LSOG10 BRMS Rules
Product and Services-PCAT	Yes	Yes*	CenturyLink Standard Practices, though not as robust, appears to serve a similar purpose as the Qwest PCAT.
Qwest E-Business -online Centrex Management Tools	No	No*	
Wholesale Customer Contacts business procedure escalations	No	No*	
Wholesale Resources-IMA	No	No*	

Qwest IMA vs CTL EASE

Qwest - Interconnect Mediated Access (IMA)

CenturyLink - Electronic Administration & Service Order Exchange (EASE)
Virtual Front Office (VFO)

	EASE-GUI LSR	EASE-Electronic Data Interface (EDI) LSR**	Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column. *(LSRs are processed in batch rather than real time. The time interval is determined by mutual agreement of the parties.)*
PAETEC (LM) system(s) are currently e-bonded directly with Qwest's systems via IMA-XML for LSRs. *Real time.*			
Product Specific Job Aids - To numerous to list -- extensive details including business rules, step-by-step processes, etc.	Yes	Yes*	EASE-GUI: Have job aids, but not as robust as Qwest's. See below for some available. LSOG 10 Convert to LNP job Aid VFO New Install Job Aid VFO new loop Job Aid Pre-Qualification Order Entry Job Aid for order entry EASE-EDI: Have job aids, but not as robust as Qwest's
Technical			**Technical**
Connection Guide	No	Yes*	
IMA XML Implementation Guidelines	No	No*	
Upgrades 3X per year	No	No*	
- Combined CLEC Question and Answer Log for each upgrade			
Stand Alone Testing Environment (SATE) for release Testing etc	No	YES*	EASE-EDI: It is available, but on a limited basis, and it does not mirror production.
- SATE data Document			
- SATE Error List			
- Question and answer Log per each upgrade			
Training			**Training**
User Guide	Yes	Yes*	
Web-based training, self-paced	Yes	Yes*	Web-based training still requires human interaction/coordination
Instructor LED	No	No*	

** PAETEC (not LM), through a 3rd party, is electronically-bonded for ASRs and LSRs. Regarding LSRs, EASE e-bonded system only processes port and DL orders.
No* - LM is not electronically-bonded with CenturyLink, so a "No" indicates that there was no information available to conclude that EASE-EDI for LSR performed the function.
Yes* - LM is not electronically-bonded with CenturyLink, so a "Yes" indicates there was information available stating that EASE-EDI performed the function for LSRs.
Unknown* - Based on the assumption that if EASE-GUI performs a function, the EASE-EDI will also perform the function. In the cases where EASE-GUI does not perform a function, and
the information is undear as to whether EASE-EDI performs the function, the "Unknown" response is entered.

Qwest DLIS v. CTL EASE

Qwest - Directory Listing Inquiry System (DLIS)	CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)		
	EASE-GUI LSR	EASE-Electronic Interface (FTP) LSR**	Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column (DLIS functions are accomplished via LSRs.
PAETEC (LM) system(s) is currently e-bonded directly with Qwest system(s) via Directory Listing Inquiry System. Real time.			
Description:			**Directory Database**
DLIS uses the Qwest listing database to obtain directory listing information. The listing database retains directory listing data for Qwest, Independent Exchange Carriers, Competitive Local Exchange Carriers, and Enhanced Service Providers			No specific database for directory only as DLIS -- Unable to find Directory DB. Unable to locate details about how to access Directory information - appears to be only available via the Customer Service Record.
Availability: AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY			
Login Requirements Digital Certificate Requirements to access Userid/Password Aministrator to manage company users			
Electronic Access Web Access -Application to Application (LM back-up)	Yes		**Electronic Access**
E-bonded - system to system direct connection	Yes	No	
Manual requests			
Facility-Base Directory Listings (FBDL) **Facility-Based CLEC Directory Listings** web page describes Qwest processes and business rules for working with CLECs to establish and maintain listing information within Qwest service areas.		Unknown	
Pre-Order Search Options Listing information may be accessed by:			**Pre-Order Search Options** T = Listings for telephone number
▪ Account Telephone Number	No	No*	
▪ Listed Telephone Number	No	No*	
▪ Non Standard Telephone Number	No	No*	

Qwest DLIS v. CTL EASE

Qwest - Directory Listing Inquiry System (DLIS)

PAETEC (LM) system(s) is currently e-bonded directly with Qwest system(s) via Directory Listing Inquiry System. _Real time._

- Service Access Code
- Straight Line Under (SLU) name
- Caption name

When multiple matches are found, DLIS allows you to select one or more listings to be displayed. Using the Company Code will help you determine if you own the account/listing

Listing Reconciliation Query:
- Facility Based Listing auto-populate to the order

Order support
Online help
User Guides
Error Codes
Error Message with Corrective Procedures
Matrix with Case Scenarios

Technical Support
Business Rule Differences for upgrades
Pre-Order Error List
Technical Specifiations
Schema examples

Training
User Guide
Instructor LED
Directory Listing Providers Business Procedures
On-Demand Verification Proof Request Forms

CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)

	EASE-GUI LSR	EASE-Electronic Interface (FTP) LSR**	Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column (DLIS functions are accomplished via LSRs.
	No	No*	
	No	No*	
	No	No*	
	No	No*	
	No	No*	
Order support			
	Yes	Yes*	
	Yes	Unknown	
	Yes	Yes*	
	Yes	Unknown	
	No	No*	
Technical Support			
	No	No*	
	No	No*	
	Yes	Yes*	
	n/a	n/a	
Training			Unable to locate a user guide for the GUI application
	No	Unknown	
	No	Unknown	
	No	Unknown	
	No	Unknown	

** - PAETEC (not LM), through a 3rd party, is electronically-bonded for ASRs and LSRs. Regarding LSRs, EASE e-bonded system only processes port and DL orders.

No* - LM is not electronically-bonded with CenturyLink; so a "No" indicates that there was no information available to conclude that EASE-EDI for LSR performed the function.

Qwest DLIS v. CTL EASE

Qwest - Directory Listing Inquiry System (DLIS)

CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)		
EASE-GUI LSR	EASE-Electronic Interface (FTP) LSR**	Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column (DLIS functions are accomplished via LSRs.)
PAETEC (LM) system(s) is currently e-bonded directly with Qwest system(s) via Directory Listing Inquiry System. *Real time*.		

Yes* - LM is not electronically-bonded with CenturyLink; so a "Yes" indicates there was information available stating that EASE-EDI performed the function for LSRs.

Qwest CEMR v. CTL

Qwest - Customer Electronic Maintenance and Repair (CEMR)

CenturyLink / Embarq - Comparable System/Application *not available*

	EASE-GUI	EASE-Electronic Interface **	CTL/Embarq System / Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
Description:				
CEMR is a web-based GUI which is accessed application to application. *Real time*.	n/a	n/a	No *	*CTL/Embarq does not have a comparable system or application available.*
Is a web interface that allows you to interact with the Qwest Maintenance & Repair facilities and request service for trouble tickets. CEMR helps you manage trouble reports for both designed circuits and nondesigned circuits. It also provides prevalidation information that helps you prepare and manage those trouble reports.				
Availability:				
AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY	n/a	n/a	n/a	
Login Requirements				
Digital Certificate Requirements to access QORA	n/a	n/a	n/a	
Userid/Password	n/a	n/a	n/a	
Aministrator to manage company users	n/a	n/a	n/a	
Electronic Access				
Web Access -Application to Application	n/a	n/a	No *	
Manual process	n/a	n/a	No *	
Trouble Reports				
Trouble reports for designed circuits				
- view circuit history	n/a	n/a	No *	
- view DMARC information	n/a	n/a	No *	
- Submit trouble reports for				
- design circuits other than Broadband	n/a	n/a	No *	
- Broadband circuits	n/a	n/a	No *	
- Follow up on design trouble first finding them and than				
- editing	n/a	n/a	No *	
- canceling	n/a	n/a	No *	
- authorizing closure	n/a	n/a	No *	
- denying closure	n/a	n/a	No *	
- changing UBL appointments	n/a	n/a	No *	
- Obtaining information on reports you've submitted by				
- viewing ticket events	n/a	n/a	No *	
- viewing trouble report history	n/a	n/a	No *	
- checking the status of transactions	n/a	n/a	No *	
- Error Messages				

Qwest CEMR v. CTL

Qwest - Customer Electronic Maintenance and Repair (CEMR)

	CenturyLink / Embarq - Comparable System/Application *not available*			
	EASE-GUI	EASE-Electronic Interface **	CTL/Embarq System / Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
CEMR is a web-based GUI which is accessed application to application. *Real time*.				
- creating trouble reports	n/a	n/a	No *	
- maintaining trouble reports	n/a	n/a	No *	
- viewing circuit history	n/a	n/a	No *	
- viewing CMARC information	n/a	n/a	No *	
Trouble reports for nondesigned circuits				
- information about the circuit				
- running an (MLT) Mechanized Loop Test	n/a	n/a	No *	
- requesting Tone on Line	n/a	n/a	No *	
- verifying features	n/a	n/a	No *	
- viewing circuit history	n/a	n/a	No *	
- viewing DMARC information	n/a	n/a	No *	
-Submit trouble reports				
- Follow up on non design reports	n/a	n/a	No *	
- editing	n/a	n/a	No *	
- canceling	n/a	n/a	No *	
- changing appointments	n/a	n/a	No *	
-information on nondesign trouble reports				
- viewing ticket events	n/a	n/a	No *	
- viewing status history	n/a	n/a	No *	
- checking the status of transactions	n/a	n/a	No *	
- Error Messages				
- creating trouble reports	n/a	n/a	No *	
- maintaining trouble reports	n/a	n/a	No *	
- running MLTS	n/a	n/a	No *	
- viewing line records	n/a	n/a	No *	
- viewing CMARC information	n/a	n/a	No *	
Prevalidation information **Prevalidation information helps you prepare and manage trouble reports for both designed and nondesigned services.**				**Prevalidation information**
Validate service address				
- Obtain Numbering Plan Area (NPA) and Local Serving Office (LSO)	n/a	n/a	No *	
- Perform a street address search	n/a	n/a	No *	
- Perform a descriptive address search (city and state)	n/a	n/a	No *	
View cable information				
- Search and verify cabling	n/a	n/a	No *	

Qwest CEMR v. CTL

Qwest - Customer Electronic Maintenance and Repair (CEMR)

CenturyLink / Embarq - Comparable System/Application *not available*

CEMR is a web-based GUI which is accessed application to application. *Real time*.	EASE-GUI	EASE- Electronic Interface **	CTL/Embarq System / Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
View carrier facility information	n/a	n/a	No *	
- View Carrier Facility Assignment (CFA)	n/a	n/a	No *	
View Design layout records (DLR)	n/a	n/a	No *	
Check order status for design services	n/a	n/a	No *	
-Circuit ID, order number, or Circuit layout number (CLO)	n/a	n/a	No *	
- Project ID	n/a	n/a	No *	
- Specific Trunk	n/a	n/a	No *	
Trouble ticket support				**Trouble ticket support**
- Online Support	n/a	n/a	No *	
- Descriptions on field names	n/a	n/a	No *	
- Error messages with discriptive resolutions	n/a	n/a	No *	
- Trouble types	n/a	n/a	No *	
- Circuit ID Format Guide	n/a	n/a	No *	
- Status and Error Codes	n/a		No *	
- Ticket Event States				
- Queued	n/a	n/a	No *	
- Open/Active	n/a	n/a	No *	
- Deferred	n/a	n/a	No *	
- Cleared *	n/a	n/a	No *	
- Closed **	n/a	n/a	No *	
- Disabled				
Technical Support				**Technical Support**
Business Rule Differences for upgrades	n/a	n/a	n/a	
Technical Specifiations	n/a	n/a	n/a	
Schema examples	n/a	n/a	n/a	

No* - LM is not electronically-bonded with CenturyLink; so a "No" indicates that there was no information available to conclude there was a comparable system that performed the function.

Yes* - LM is not electronically-bonded with CenturyLink; so a "Yes" indicates there was information available stating there was a comparable system that performed the function.

Qwest MEDIACC v. CTL EASE

CenturyLink / Embarq - Comparable System/Application - *Unknown*

Qwest - MEDIACC-EBTA

	EASE-GUI	EASE-Electronic Interface **	CTL/Embarq Unknown Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
Description:				
PAETEC (LM) system(s) is currently e-bonded directly with Qwest system(s) via Electronic Bonded Trouble Application (EBTA). *Real time*.				
MEDIACC-EBTA provides a common electronic gateway for Qwest Wholesale customers to communicate with various Qwest business applications.	n/a	n/a	Yes*	*Embarq/CTL/Other System??:* The ability to create, modify, track and resolve trouble tickets is not done through EASE-EDI. However, based on information gathered from the CTL/Embarq website, *CTL appears to have a web interface that may perform some of the same functions.*
Availability:				
AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY	n/a	n/a	Unknown	
Login Requirements				
Digital Certificate Requirements to access	n/a	n/a	Unknown	
User ID/Password	n/a	n/a	Unknown	
Administrator to manage company users	n/a	n/a	Unknown	
Electronic Access				
MEDIACC-EBTA GUI – Web Access -Application to Application	n/a	n/a	Unknown	
EBTA –I Qwest and PAETEC (LM) systems are electronically bonded. Information is relayed in *real time* between the systems and companies.			No*	
Manual process	n/a	n/a	Unknown	
Function				
Electronic Bonding is real-time and secure electronic exchange of data between information systems in separate companies.	n/a	n/a	Unknown	
Create Trouble Report (Enter Trouble Report)	n/a	n/a	Unknown	
Request Trouble Report Status (GET)	n/a	n/a	Unknown	
Add Trouble Information	n/a	n/a	Unknown	
Modify Trouble Information	n/a	n/a	Unknown	
Status Change Event Notification	n/a	n/a	Unknown	
- Confirmation from Qwest when they receive any correspondence from LM			Unknown	
- Provide status updates each time Qwest addresses the Trouble Ticket			Unknown	
- Note whether billable charges are associated with Trouble Ticket			Unknown	
Critical Attributes for Flow-Through	n/a	n/a	Unknown	
Used to determine if the trouble report received achieves current flow-through				
Technical Support				
The MEDIACC/EBTA interoperability environment	n/a	n/a	Unknown	
Testing Environment	n/a	n/a	Unknown	

No* - LM is not electronically-bonded with CenturyLink; so a "No" indicates that there was no information available to conclude there was a comparable system that performed the function.
Yes* - LM is not electronically-bonded with CenturyLink; so a "Yes" indicates there was information available stating there was a comparable system that performed the function.

Qwest CMS v. CTL

Centrex Management System (CMS)

	CenturyLink / Embarq - Comparable System/Application *not available*			
	EASE-GUI	EASE-Electronic Interface **	CTL/Embarq System / Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
PAETEC (LM) is currently e-bonded directly with Qwest system(s) to achieve a CMS Application to application arrangement. *Real time*.				
Description: Centrex Management System (CMS) allows you to exercise substantial control over your Centrex facilities and functions. CMS provides you with direct access to a mirror image of your central office-based service. Through a user-friendly web based graphical user interface (GUI), you may make changes quickly and easily to keep pace as your business changes. CMS enables you to add features, change parameters, expand calling groups, verify information and target features and functions to the most appropriate personnel	n/a	n/a	No	*CTL/Embarq does not have a comparable system or application available.*
Availability: AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY	n/a	n/a	n/a	**Availability:**
Electronic Access CMS GUI -- Web Access -Application to Application CMS-- Qwest and PAETEC (LM) systems are electronically bonded. Information is relayed in *real time* between the systems and companies. Manual process	n/a	n/a	No No No	**Electronic Access**
Functions: Add features, change parameters, expand calling groups, verify information and target features and functions to the most appropriate personnel	n/a	n/a	No	**Functions:**

No* - LM is not electronically-bonded with CenturyLink; so a "No" indicates that there was no information available to conclude there was a comparable system that performed the function.
Yes* - LM is not electronically-bonded with CenturyLink; so a "Yes" indicates there was information available stating there was a comparable system that performed the function.

Qwest QORA v. CTL EASE

Qwest - Qwest Online Request Application (QORA) Access Service Requests (ASRs)

PAETEC (LM) system(s) is currently e-bonded directly with Qwest's system(s) to transmit ASRs. *Real time.*

CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)

	EASE-GUI ASR	EASE-Electronic Interface ASR**	Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column. *(ASRs are processed in batch rather than real time. The time interval is determined by mutual agrmt of the parties.)*
Function: QORA allows users to electronically submit ASRs for trunking, Local Interconnect Services (LIS), interstate and intrastate-switched access, and Private Line Transport Services (PLTS) offered for the origination and/or termination of inter-exchange traffic. Qwest ASR Ordering follows the Access Service Ordering Guidelines (ASOG)			
Availability: AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY			
Login Requirements			
Digital Certificate Requirements to access QORA	n/a	n/a	
Userid/Password	Yes	Yes	
Aministrator to manage company users	Yes	Yes	
Electronic Access			
E-Bonded ASR - direct system to system connection.			
QORA GUI - Web Access, Application to Application (LM uses for back-up)	Yes	Yes	
Manual Access	Yes	Yes	
Pre-Order transactions			
Location Inquiry Address Validation: address,Telephone number and/or circuit		Yes	
CFA Validation	Yes	Yes	
CLLI Scan-locate CLLI between two specific CLLI Codes	Yes	Unknown	
NC/NCI Validation	Yes	Unknown	
BAN Validation	No	Unknown	
Order functions			
- Checking Request Status	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Revising a Rejected Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Supplementing a Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Copying a Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Using a Request as a Template	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Printing Requests	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Deleting a Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Editing a Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Submitting a Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Restructuring a Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Searching For a Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
- Creating a New Request	Yes	Unknown	Provides function, but unaware of the scope of information provided compared to the e-bond ASRs with Qwest
Error Code Guide	Yes	Unknown	

Qwest QORA v. CTL EASE

Qwest - Qwest Online Request Application (QORA) Access Service Requests (ASRs)	CenturyLink - Electronic Administration & Service Order Exchange (EASE) Virtual Front Office (VFO)		
PAETEC (LMI) system(s) is currently e-bonded directly with Qwest's system(s) to transmit ASRs. *Real time.*	EASE-GUI ASR	EASE-Electronic Interface ASR**	Notes, comments, clarifications about EASE regarding the corresponding function noted in the Qwest column. *(ASRs are processed in batch rather than real time. The time interval is determined by mutual agrml of the parties.)*
Order support			
Online help	Yes	Unknown	
User Guides	Yes	Yes	
Field Level Help	Yes	Unknown	
Full Field Names	Yes	Unknown	
Glossary support	Yes	Unknown	
	No	No	
ASRs that have been submitted will be retained in the database for a period of 2 years. A purge of these records twice annually in January and July. The purge date will be based on the date of the last activity transmitted on the ASR. Requests that have been created but not submitted to Qwest will not be purged from the database regardless of the date created. Your browser may ask you whether you want passwords and information you type to be saved for future use.	No	No	
	Unknown	Unknown	
Post-Order functions			
Reporting Tool- of submitted requests and order statuses-downloadable	No	Unknown	
Search ASR requests for status	No	Unknown	
ASR status summary	No	Unknown	
Firm Order Confirmation	No	Unknown	
View DLR information	No	Unknown	
Clarification / Notification Request	No	Unknown	
Training			
ASR User Guide	Yes	Yes	
Instructor LED	No	No	
Customer Administrators Guide	Yes	Yes	
ASR Implementation Guidelines	Yes	Yes	
OSS Support			
ASOG Question Log	No	No	
ASOG Frequently Asked question log	No	No	
ICSC Codes	Unknown	Unknown	
OSS Production Support -Event Notifications-Processes, Systems, Technical.	Yes	Yes	
Technical Support			
ICSC Codes Determination	Unknown	Unknown	
Business Rule Differences from one upgrade to another	No	No	
Pre-Order Error List	No	No	
Technical Specifiations	Yes	Yes	
Transport Schema	No	No	
Valid Spec Codes	Yes	Yes	

Qwest Q.Pricer v. CTL

Qwest - Q.Pricer

	CenturyLink / Embarq - Comparable System/Application?? *appears not available*			
	EASE-GUI	EASE-Electronic Interface **	CTL/Embarq System / Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
Q.Pricer is a web-based GUI which is accessed application to application. *Real time*.				
Description				
Q.pricer allows customers to obtain and save a price quote for unregulated leased local access, unregulated private line services, unregulated Qwest local broadband services, Customer Provided Access (CPA) and regulated private line services.	n/a	n/a	No*	*Embarq/CTL Application??:* Based on our research of the CTL/Embarq website, there appear *not to be a comparable application available for this function, nor does it appear that this function is available* in an application.
Availability: AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY	n/a	n/a	n/a	**Availability:**
Electronic Access Web Access -Application to Application	n/a	n/a	No*	**Electronic Access**
Function: Product Pricing	n/a	n/a	No*	**Function:**

No* - LM is not electronically-bonded with CenturyLink; so a "No" indicates that there was no information available to conclude there was a comparable system that performed the function.

Yes* - LM is not electronically-bonded with CenturyLink; so a "Yes" indicates there was information available stating there was a comparable system that performed the function.

Qwest Qcontrol v. CTL

Qwest - Qwest Control (Qcontrol)	CenturyLink / Embarq - Comparable System/Application?? appears not available			
	EASE-GUI	EASE-Electronic Interface	CTL/Embarq System / Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
Description: Qwest Control is a web-based GUI which is accessed application to application. *Real time*. QControl is a secure proprietary on-line and web-based application that provides instant access and management control over a broad range of Qwest National Wholesale Products and Services	n/a	n/a	No*	*Embarq/CTL Application??:* Based on our research of the CTL/Embarq website, there appear *not to be a comparable application available for this function, nor does it appear that this function is available* in an application.
Availability: AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY	n/a	n/a	n/a	
Login Requirements Self Service web portal	n/a	n/a	n/a	**Login Requirements**
User ID/Password	n/a	n/a	n/a	
Electronic Access Web Access -Application to Application	n/a	n/a	No*	**Electronic Access**
Primary Function Pull resale invoices not received electronically	n/a	n/a	No*	**Primary Function**
Ordering and Billing	n/a	n/a	No*	
Capabilities/Modules/Applications: **Home Module** This module provides you access to QControl Products and Services, access to the Resource Center and a link to contact Qwest. **Toll Free Application** View the inventory of Toll Free services associated to your QControl ID. In addition, you have the ability to reserve numbers, run utilization, configuration and summary reports, view and modify existing call plan routes, and access repair tickets for your Toll Free services.	n/a	n/a	No*	**Capabilities/Modules/Applications:**

Qwest Qcontrol v. CTL

Qwest - Qwest Control (Qcontrol)

Qwest Control is a web-based GUI which is accessed application to application. _Real time_.

CenturyLink / Embarg - Comparable System/Application?? _appears not available_

	EASE-GUI	EASE-Electronic Interface **	CTL/Embarq System / Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
Data Application Allows you to manage your domestic Asynchronous Transfer Mode (ATM) and Frame Relay services associated to your QControl ID. Some of the features available under the Data product include access to inventory, the ability to request & view reports, check alarm status, view network maps, and view/create repair tickets.	n/a	n/a	No*	
Dedicated Hosting (DH) Application Allows you to manage your DH services associated to your QControl ID. Some of the features available under the Hosting product include access to inventory, the ability to request and view reports and access to your account information through a Hosting Portal.	n/a	n/a	No*	
Qwest IQ Net (DIA) Application allows you to manage your DIA (Dedicated Internet Access) services associated to your QControl ID. Some of the features available under the Qwest IQ Net product include access to inventory, the ability to request and view reports, configuration status and the ability to create and monitor repair tickets.	n/a	n/a	No*	
Long Distance (LD) Application Allows you to view a listing of your LD inventory associated to your QControl ID. You also have the ability to filter and/or download your inventory and the ability to create and monitor repair tickets. In addition, the LD product application provides you the ability to view your Project Accounting Codes (PAC). Included in this application is your Dedicated Long Distance (LD) inventory. This application allows you to filter and download your inventory, as well as open repair tickets.	n/a	n/a	No*	
eBilling Module Allows you to access your online bills (eBills), specify your delivery options, request and view a history of your charges and add more billing accounts to your QControl ID.	n/a	n/a	No*	

Qwest Qcontrol v. CTL

Qwest - Qwest Control (Qcontrol)

CenturyLink / Embarq - Comparable System/Application?? *appears not available*

Qwest Control is a web-based GUI which is accessed application to application. *Real time*.

	EASE-GUI	EASE-Electronic Interface **	CTL/Embarq System / Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
IP Addressing				
Allows you to manage New IP Addressing, Return IP Addressing, Multiple Circuit IDs and SWIP (Shared Wholesale Project) abuse.	n/a	n/a	No*	
DNS				
Allows you to manage New DNS, Modify Existing DNS, Reverse DNS, Delete DNS, and check for DNS availability.	n/a	n/a	No*	
Routing				
Allows you to add or delete routing configurations for your network	n/a	n/a	No*	
Configuration Requests				
Allows you to track the status of your configuration requests	n/a	n/a	No*	
Repair Module				
Allows you view or create tickets for your products and services that are associated to your QControl ID.	n/a	n/a	No*	
Support				Support
User Guide				
Administrative User Guide	n/a	n/a	No*	

No* - LM is not electronically-bonded with CenturyLink; so a "No" indicates that there was no information available to conclude there was a comparable system that performed the function.
Yes* - LM is not electronically-bonded with CenturyLink; so a "Yes" indicates there was information available stating there was a comparable system that performed the function.

Qwest ODM v. CTL

Qwest - Online Dispute Management (ODM)

ODM is a web-based GUI which is accessed application to application. *Real time*.

CenturyLink / Embarq - Comparable System/Application - *Unknown*

	EASE-GUI	EASE-Electronic Interface **	CTL/Embarq Unknown Application	Notes, comments, clarifications about CTL/Embarq system/application regarding the corresponding function noted in the Qwest column
Description: ODM is a common Web portal accessed via the Remote Control ordering system that allows Qwest Wholesale national customers to enter, submit, view, update, and cancel billing disputes.	n/a	n/a	Yes*	*Embarq/CTL/Other System??:* The ability to enter, submit, view, update, and cancel billing disputes is not done through EASE-EDI. However, based on information gathered from the CTL/Embarq website, *CTL appears to have an electronic interface for this process.*
Availability: AZ, CO, IA, ID, MN, MT, NE, NM, ND, OR, SD, UT, WA, WY	n/a	n/a	Unknown	
Electronic Access Web Access -Application to Application	n/a	n/a	Unknown	**Electronic Access**
Functions:				**Functions:**
Access the Create Dispute Module	n/a	n/a	Unknown	
Create a new dispute	n/a	n/a	Unknown	
Add attachment to a new dispute	n/a	n/a	Unknown	
Submit a new dispute and print confirmation	n/a	n/a	Unknown	
Download dispute lists	n/a	n/a	Unknown	
Display dispute history	n/a	n/a	Unknown	
View dispute details	n/a	n/a	Unknown	
Cancel a dispute	n/a	n/a	Unknown	
Print dispute lists	n/a	n/a	Unknown	
Dispute Types	n/a	n/a	Unknown	
Support: Graph for quick links menu	n/a	n/a	Unknown	**Support:**
Training User Guide Online Training	n/a	n/a	Unknown	**Training**

No* - LM is not electronically-bonded with CenturyLink; so a "No" indicates that there was no information available to conclude there was a comparable system that performed the function.
Yes* - LM is not electronically-bonded with CenturyLink; so a "Yes" indicates there was information available stating there was a comparable system that performed the function.