

**EXHIBIT BJJ-11 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

From: Johnson, Bonnie J.
Sent: Wednesday, January 05, 2011 1:38 PM
To: 'cmpcr@qwest.com'
Cc: Isaacs, Kimberly D.; Denney, Douglas K.; Johnson, Bonnie J.; 'Redman-Carter, Julia'
Subject: Integra Comments (Revised)- SYST:MEDI:RN New Interface Maintenance Ticketing Gateway: Eff 09-19-11

Integra also submitted these revised comments via the website.

Integra submitted comments on 1/4/11 and sent a subsequent email with corrections. With these revised comments, Qwest will not have to reference multiple sources for Integra's comments when responding.

In Qwest Notice SYST.MEDI.12.17.10.F.08642.MTG_IntrfceNewApptoApp (dated 12/17/10, with a proposed effective date of 9/19/11), Qwest announced that Qwest intends to replace both "MEDIACC and CEMR" with a targeted production date of 9/19/2011 for the system (the Maintenance Ticketing Gateway or MTG) that Qwest indicates would replace both MEDIACC and CEMR. The notice contains insufficient information for Integra to conclude that the replacement system is beneficial to CLECs. It is also unclear whether or how Qwest's notice is consistent with Qwest and CenturyLink's merger commitments and specifically the merger settlement agreement executed by Qwest, CenturyLink, and Integra in November of 2010 (see further details below). Therefore, Integra must object to changes to, or retirement of, MEDIACC and CEMR and replacement of these systems with MTG. If Qwest provides additional information and provides opportunity for comment on the additional information, Integra will review and consider the additional information and may provide further comment at that time. Please provide written information supporting Qwest's claim that in its notice that there is a "benefit" to this "new application." To the extent that Qwest claims the current system(s) is unstable, Qwest needs to provide sufficient information to allow verification of that claim. For example, please identify any notices or other communications about outages or problems that were due to the alleged instability and explain the problems caused and any steps taken to resolve those problems.

Regarding merger commitments, the Joint Applicants said, for example, that wholesale customers will not face immediate changes to existing operations (see MN Mr. Hunsucker Surrebuttal, p. 4), and that "we have committed to . . . the 24-month moratorium before we make any changes." (See MN Transcript, Vol. 2B, pp. 83-84.) Given that Qwest, in its December 17 notice, announced a timeline that began on the same day (December 17, 2010), CLECs are already facing immediate changes to existing operations. At the hearing, the witness testified that he would characterize an immediate change as "day one after the closing of the transaction." (MN Transcript, Vol. 2B, pp. 83-84.) In other words, he said there will be no changes to Qwest's OSS on or after day one of the closing. Per the "timeline" laid out in Qwest Notice SYST.MEDI.12.17.10.F.08642.MTG_IntrfceNewApptoApp, however, if the closing occurs in or before June, several deadlines for OSS changes would occur after the closing date. Per the timeline in Qwest's notice, for example, the changes reflected in draft technical specifications issued on May 20, 2011 do not occur after a 24-month moratorium (as suggested in merger testimony), but rather occur on or before September 19, 2011 (less than 24 months after closing). Please explain whether and how the proposed changes and timeline in Qwest Notice SYST.MEDI.12.17.10.F.08642.MTG_IntrfceNewApptoApp are consistent with such merger testimony.

Regarding the Qwest-CenturyLink-Integra merger settlement agreement (to which Qwest and its affiliates, including Qwest Corporation, are parties), Condition # 12 provides that, in legacy Qwest ILEC service territory, after the Closing Date, the Merged Company will use and offer to wholesale customers the legacy Qwest Operational Support Systems (OSS) for at least two years, or until July 1, 2013, whichever is later. Condition #12 also provides that the Merged Company will not replace or integrate Qwest systems without first establishing a detailed transition plan and complying with several procedures, including notifying the FCC, state commissions, and affected parties of the plan and steps to be taken to ensure data integrity is maintained, and gaining sufficient acceptance by CLECs to help assure that the replacement interface provides the level of wholesale service quality, including a majority vote of CMP participants. Please explain whether and how the proposed changes and timeline in Qwest Notice SYST.MEDI.12.17.10.F.08642.MTG_IntrfceNewApptoApp are consistent with the Qwest-CenturyLink-Integra merger settlement agreement. Please explain how Qwest can retire MEDIACC and CEMR on 9/19/2011 and still offer the same legacy Qwest OSS (MEDIACC and CEMR) for at least two years. Please address each procedure described in Condition #12 and indicate – regardless of whether Qwest takes the position that the procedures outlined in Condition #12 are required by the settlement agreement or not – whether Qwest will implement each step with respect to the proposed changes in Qwest Notice SYST.MEDI.12.17.10.F.08642.MTG_IntrfceNewApptoApp (and any associated notices, including any notices relating to CEMR). For example, will the company notify the FCC and state commissions of the replacement of MEDIACC and CEMR? Will the company conduct and abide by a majority vote of CMP participants regarding replacement of MEDIACC and CEMR? When will these steps occur? etc.

Integra reserves our rights to submit additional questions, comments and/or objections in the future, particularly as more information become available.

Bonnie Johnson | Director Carrier Relations
Direct 763.745.8431 | fax 763.745.8459
Integra Telecom | 6150 Golden Hills Drive | Golden Valley, MN 55419-1070
bjohnson@integratелеcom.com

