

**EXHIBIT BJJ-13 TO THE  
DIRECT TESTIMONY OF  
BONNIE J. JOHNSON  
ON BEHALF OF  
INTEGRA TELECOM**

**Qwest Response to Document in Review**

**Comment Response Date:** January 13, 2011  
**Document Subject:** CMP - Maintenance Ticketing Gateway (MTG) 1.0 - New Application to Application Interface Preliminary Systems Release Information  
**Initial Notification Date:** December 17, 2010  
**Initial Notification Number:** SYST.MEDI.12.17.10.F.08642.MTG\_IntrfceNewApptoApp  
**System Release Number:** MTG Release 1.0

Qwest recently posted proposed updates to **MTG Release 1.0 associated with Qwest CR# SCR121608-02**. CLECs were invited to provide comments to these proposed changes during a Document Review period from December 17, 2010 through January 6, 2011. The information listed below is Qwest's Response to CLEC comments provided during the review/comment cycle.

**Resources:**

Customer Notice Archive <http://www.qwest.com/wholesale/notices/cnla/>  
 Document Review Site <http://www.qwest.com/wholesale/cmp/review.html>

If you have any questions on this subject or there are further details required, please contact Qwest's Change Management Manager at [itcomm@qwest.com](mailto:itcomm@qwest.com).

**Qwest's Response to Comments on SYST.MEDI.12.17.10.F.08642.MTG\_IntrfceNewApptoApp.**

#	CLEC Comment	Qwest Response
1	<p><b>PAETEC</b>  <b>December 20, 2010</b>                      Due to the extensive OSS system interfaces between PAETEC and Qwest and the limited information of the proposed changes provided to PAETEC thus far, PAETEC prefers to reserve our response(s) until we have more information and understand the impact of the proposed changes on PAETEC's internal processes and back office systems.</p> <p>For the reason noted above, it is premature for PAETEC to respond at this time. However, due to the limited time frame and potential magnitude of impact, PAETEC must object to the new proposed changes until we have a clear understanding of the impacts, cost, resources, etc that the proposal will have on PAETEC.</p>	<p>Qwest sent the following informal response to PAETEC on December 21, 2010:</p> <p>Qwest has received your comment and your objection to the proposed new interface MTG, Maintenance Ticketing Gateway.</p> <p>Per Section 7 of the CMP document, Introduction of a New OSS Interface, Qwest has scheduled a Preliminary Implementation Plan Review Meeting on January 10, 2011 to discuss the design and development of MTG. Qwest proposes that we discuss your formal comment to this new system at that meeting which is intended to assist you in understanding the functionality and technology that Qwest will be implementing in September 2011. Hopefully, the Preliminary Review meeting will allow you to better assess the impacts to PAETEC. If you have specific questions that you would like Qwest to consider for the Review meeting, please forward them to the CMPCOMM</p>

		<p>mailbox by January 6 to allow time for our SMEs to review them.</p> <p>Qwest received additional comments from PAETEC on January 5, 2011. See below.</p>
2	<p><b>INTEGRA</b> <b>January 5, 2011</b></p> <p>Integra also submitted these revised comments via the website.</p> <p>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.</p> <p>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</p>	<p>Additional benefits associated with the MTG implementation will be posted to the Wholesale Calendar on January 14, 2011 and reviewed in the Preliminary Implementation Plan Review meeting now scheduled for January 19.</p> <p>All questions or comments associated with the planned implementation and timeline for MTG in regard to the Merger Settlement Agreement executed by Qwest, CenturyLink and Integra should be referred to the Qwest or CenturyLink Legal Departments.</p> <p>MEDIACC/CEMR hardware, database and operating systems are at end of life. To ensure business continuity and service quality for automation of repair functionality, Qwest needs to replace these systems.</p>

<p>about outages or problems that were due to the alleged instability and explain the problems caused and any steps taken to resolve those problems.</p> <p>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.</p> <p>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</p>	<p>As stated above, all questions or comments associated with the planned implementation and timeline for MTG in regard to the merger Settlement Agreement executed by Qwest, CenturyLink and Integra should be referred to the Qwest or CenturyLink Legal Departments.</p>
<p>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</p>	

	<p>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</p> <p>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</p> <p>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.</p> <p>Integra reserves our rights to submit additional questions, comments and/or objections in the future, particularly as more information become available.</p>	<p>As stated in Change Management notification <b>CMPR.MEET.01.06.11.F.08716.ChgDateMTG_Prelim_ImpRevw</b> sent January 6, 2011, as a result of CLEC comments received on the initial system notification, Qwest identified that an additional two week comment period would be provided following the Preliminary Implementation Plan Review Meeting on January 19, 2011. This additional comment period will offer CLECs the opportunity to provide further comment on the additional documentation that was provided and on those things discussed in the meeting.</p>
3	<p><b>PAETEC</b> <b>January 5, 2011</b></p> <p>To begin assessing the impact, PAETEC would need to know details on the following:</p> <ul style="list-style-type: none"> <li>• Functionality and process differences between the Qwest proposed and what PAETEC currently has</li> <li>• The messaging format to be used</li> <li>• Technology to be used for connectivity</li> </ul>	<p>On January 14, 2011, Qwest will post on the Wholesale Calendar additional functional and technical information and will review that information during the Preliminary Implementation Plan Review Meeting now scheduled for January 19. As identified on the MTG implementation timeline in the preliminary notification, per Section 7.1.5 of the CMP document, detailed design and technical</p>

	<p>PAETEC has reviewed Integra's comments submitted January 5, 2011. PAETEC concurs with Integra's comments and poses the same inquiries.</p> <p>Also, PAETEC requests that a full 2-week comment cycle be opened following the January 10<sup>th</sup> ad hoc meeting assuming that at the ad hoc meeting Qwest will provide documentation of sufficient detail and information to PAETEC so we can assess impacts. Once we know the details of the proposal and the impacts, PAETEC can then comment. Qwest's failure to provide sufficient details to which PAETEC could comment with the notice resulted in a premature comment period. Thus, once Qwest provides documentation of sufficient detail and information, a two week comment period should be opened.</p> <p>Again, due to lack of information and details for which to assess the potential impacts of the proposed changes, PAETEC objects to the elimination of MEDIACC and CEMR and the replacement MTG. Furthermore, PAETEC reserves additional comment(s) until we have 1) received and reviewed the information; and 2) assessed the impacts to PAETEC.</p>	<p>interface information will be provided on May 20, 2011 as part of the Draft Interface Technical Specifications.</p> <p>See Qwest response to Integra's comment provided above.</p> <p>As stated in Change Management notification <b>CMPR.MEET.01.06.11.F.08716.ChgDateMTG_P relim_ImpRevw</b> sent January 6, 2011, as a result of CLEC comments received on the initial system notification, Qwest identified that an additional two week comment period would be provided following the Preliminary Implementation Plan Review Meeting on January 19, 2011. This additional comment period will offer CLECs the opportunity to provide further comment on the additional documentation that was provided and on those things discussed in the meeting.</p>
4	<p><b>INTEGRA</b> <b>January 5, 2011</b></p> <p>Integra agrees that CLECs should have an opportunity to comment after the call on January 10<sup>th</sup>.</p>	<p>As stated in Change Management notification <b>CMPR.MEET.01.06.11.F.08716.ChgDateMTG_P relim_ImpRevw</b> sent January 6, 2011, as a result of CLEC comments received on the initial system notification, Qwest identified that an additional two week comment period would be provided following the Preliminary Implementation Plan Review Meeting on January 19, 2011. This additional comment period will offer CLECs the opportunity to provide further comment on the additional documentation that was provided and on those things discussed in the meeting.</p>