

**EXHIBIT BJJ-15 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

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Sent: Tuesday, February 01, 2011 5:30 PM

To: cmpcomm@qwest.com

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Subject: Comments to SYST.MEDI.01.20.11.F.08765.AddlCmmntsCycleMTG_Intrfc (Associated CR#: MTG Release 1.0 Qwest CR# SCR121608-02)

Below are PAETEC comments. Attached are the comments in a Microsoft word version (for viewing footnote).

Qwest CMP:

From an IT/operational perspective^[1] PAETEC has an open-mind and is not taking a position for or against the MTG replacement of MEDIACC/CEMR. To date, Qwest has only provided vague, high-level information about the functionalities of MTG. Accordingly, PAETEC is unable to make an informed decision to support or oppose the proposed change.

Since Qwest has only provided a high level explanation of its proposal to replace MEDIACC and CEMR with MTG, PAETEC has significant questions and concerns that are unanswered by the information provided by Qwest at this time. As Qwest likely knows from filings PAETEC has made in other regulatory forums, PAETEC has made significant investments in its own back office systems that are e-bonded with MEDIACC/CEMR that result in real time, automated system interactions, most notably with respect to EBTA (Electronic Bonded Trouble Application). The potential loss of the automated functionality enabled by the e-bonding between MEDIACC/CEMR and the PAETEC OSS is at the heart of several over-arching concerns:

- 1) Though Qwest avers that MTG will provide the same functions as CEMR/MEDIACC, Qwest's statement is very high level. Nothing in the documentation provided so far clearly identifies whether the proposed MTG will perform the same level of automated, real-time information exchange between the MTG and another company's back office system using a substantially similar interface. Significantly more information is required to make a determination as to the interface and the functional capabilities of MTG.
- 2) Will the proposed change to MTG support the continued use of PAETEC back office automated processes currently enabled using the XML interface with MEDIACC/CEMR? If not, what is different about MTG that inhibits or prevents the continued use of these automated processes that the e-bonded interface with MEDIACC/CEMR supported?

^[1] In the merger dockets, Qwest and CenturyLink offered a commitment to maintain the existing Qwest OSS for 24 months from the closing of that transaction. The replacement of MEDIACC and CEMR with MTG might violate the various settlement agreements that incorporate that commitment. This filing does not address that issue, but PAETEC reserves its rights to subsequently raise that issue in any appropriate forum.

- 3) What changes (details) will there be as to how Qwest and PAETEC interface, send and receive information back-and-forth between MTG and our existing systems?
(Attempting to determine the extent of the modification required to PAETEC's myriad of internal systems.) How will Qwest test MTG before putting it into production? Will a third party be used to test the new system, or will Qwest propose CLECs be the only testing partners? If so, what criteria will be used to justify the end of testing and deployment into commercial use?
- 4) What are the time, costs, and resources that will be required of CLECs to implement the proposed MTG replacement?
- 6) What are, if any, the increased time, costs, and resources that will be required of CLECs to maintain MTG over MEDIACC/CEMR?

Once PAETEC has enough information and details to address these concerns and questions and assess the impacts, PAETEC may then assert a definitive position as to the elimination of MEDIACC/CEMR. If Qwest does not make adequate information available to PAETEC relatively soon, PAETEC may not be able to support the proposed move to MTG.

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