

**EXHIBIT BJJ-16 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

From: Johnson, Bonnie J.
Sent: Wednesday, February 02, 2011 1:47 PM
To: 'cmpcr@qwest.com'
Cc: Johnson, Bonnie J.; Isaacs, Kimberly D.; Julia Redman-Carter (julia.redman-carter@paetec.com)
Subject: RE: SYST.MEDI.01.20.11.F.08765.AddCmmntsCycleMTG_Intrfc

Due to length and formatting issues that occur with on-line submission, Integra is submitting these comments to the Qwest CMP.CR email address, however, Integra has also submitted the comments on-line.

Integra incorporates its January 5, 2001 comments by reference. Integra's concerns are similar to those expressed by PAETEC in its February 1, 2011 comments. Qwest's 1/19/11 presentation provided little or no additional information as to the functionality of the proposed new system versus the existing system (MEDIAC/CEMR). Qwest has made only a high level statement that the proposed new system would have the same functionality as the existing system, and that is not sufficient to address CLEC concerns. Given that Joint Applicants have made other statements about system functionality being the same between systems (in the merger dockets), but CLECs disagreed, there is ample reason to request detailed information regarding proposed functionality and how it compares to existing functionality, so that the CLECs can determine whether they agree the functionality is the same. Qwest provides no data or information that, for example, confirms that the response time or data exchanged would be the same or even similar. Integra has also requested clarification from Qwest regarding MLT testing, which is a critical function for non loop (QLSP) circuits, and Qwest needs to address that question in CMP as well. Overall, more detail is required, even assuming that Qwest is going to take steps consistent with the merger settlement agreement in a manner that may allow it to proceed at some point with its proposed changes.

In Qwest's January 13, 2011 response to Integra's January 5, 2011 comments, Qwest said: "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." Integra objects to Qwest using CMP to unilaterally assert its legal position while referring CLECs to Qwest legal. If it is appropriate for Qwest to raise the matter in CMP, then it is appropriate not only for CLECs to respond in CMP and but also for CLECs to expect Qwest to adhere to CMP requirements requiring Qwest to respond in CMP and to do so in a timely manner. Before proceeding with any change, Qwest needs to explain how Qwest's schedule, which includes OSS changes and a system retirement after the merger closing date, is consistent with the merger settlement agreement. Qwest did not answer Integra's questions about whether Qwest intends to comply with the provisions of the merger settlement agreement, such as a vote in CMP. Before proceeding with any change, Qwest needs to address each step in the merger document, including the vote in CMP, and indicate whether and when it intends to take each step. It is unclear what will prevent Qwest from similarly violating the timeframes and ignoring the OSS language in the settlement agreement for other systems if Qwest proceeds with these changes without so much as answering these questions. Qwest needs to address this concern. If Qwest wants its legal department to respond, Qwest should forward these comments, along with the CLECs' earlier comments, to Qwest legal and ask Qwest legal to provide a response. Integra will then ask that Qwest make Qwest's response and any CLEC replies part of the CMP record, since Qwest has raised the issue via its CR in CMP. Like the lack of specific information about Qwest's proposal, not knowing which steps, in any, of the OSS terms of the settlement agreement Qwest will follow and when precludes further assessment and comment at this time. Integra reserves its rights. Please respond in writing to the questions posed by CLECs in their earlier comments and this round of comments.

Bonnie

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