

**EXHIBIT BJJ-20 TO THE  
DIRECT TESTIMONY OF  
BONNIE J. JOHNSON  
ON BEHALF OF  
INTEGRA TELECOM**

**From:** Clauson, Karen L.  
**Sent:** Wednesday, February 16, 2011 1:29 PM  
**To:** 'Butler, Daphne'; 'Gardner, Linda K[CTL]'; 'jason.topp@qwest.com'; 'ahern.michael@dorsey.com'; 'susan.masteron@centurylink.com'  
**Cc:** Denney, Douglas K.; Johnson, Bonnie J.; Oxley, J. Jeffery  
**Subject:** CEMR/MEDIACC and MTG

Daphne and Linda:

The CEMR/MEDIACC/MTG issue was discussed on the Qwest Change Management Process (CMP) call today. Qwest representatives again referred CLECs to your legal departments for answers to our questions about the relationship of the proposed changes to the merger settlement agreements (and PUC orders approving or incorporating those agreements) and whether and when Qwest will take each of the steps set forth in paragraph 12 (including subparagraphs) of the Integra merger settlement agreement. Therefore, we continue to look to you to provide the responses to our questions, including those in my email below.

On the CMP call today, Qwest made no commitment to continue to use and offer CEMR/MEDIACC (the legacy Qwest OSS for repair) for at least two years, or until July 1, 2013, as required by paragraph 12 of the settlement agreement. Qwest made no commitment that, whenever it occurs, the replacement or retirement of a Qwest OSS interface may not occur without sufficient acceptance of the replacement interface by CLECs, as described in paragraph 12c of the settlement agreement. Although the company asked in negotiations for a specific language relating to billing OSS (see paragraph 12d), the company did not ask in settlement negotiations for any repair-specific OSS language. Integra's settlement agreement was filed on Nov. 8, 2010, and Qwest re-introduced this Change Request ("CR") on Nov. 10, 2010. Qwest has not yet withdrawn or deferred its CR to retire MEDIACC ([http://www.qwest.com/wholesale/cmp/cr/CR\\_SCR121608-01.html](http://www.qwest.com/wholesale/cmp/cr/CR_SCR121608-01.html)). Qwest said in CMP today that it "may" defer retirement/replacement of CEMR/MEDIACC but did not commit to when it would do so or to any length of time for which it would defer retirement/replacement (e.g., 2 years). A short deferment would not alter the problems described in my email below. Qwest should withdraw this CR, and the companies should follow paragraph 12 (and subparagraphs) of the settlement agreement.

Regarding the reason provided by Qwest for retiring and replacing CEMR/MEDIACC, Qwest alleged instability and pointed to the number of outages last year. Integra indicated that it tracks those outages, and there were fewer outages last year than there have been since 2003. Qwest then admitted that it tracks these outages as well, and confirmed that there were fewer outages last year than since 2003. Qwest also alleged certain manufacturer or vendor difficulties but, although Integra has been requesting this information for some time, did not provide any specifics and, once again, just said it may provide more information later. When asked about its reasons for this proposing retirement/replacement, Qwest said that CEMR/MEDIACC is not a "high availability system with fail over." Qwest, however, made no commitment that the replacement system (MTG) would be a high availability system with fail over. Qwest said it doesn't even know itself yet whether the new system will be a high availability system with fail over, as Qwest has not yet decided on a platform and/or environment. It is unclear why Qwest is forging ahead with implementing a system that may not solve the alleged problem. We understand that Embarq's repair system (WebRSS) cannot be used after the billing integration and that CenturyLink's other entities basically use manual processes (calling in repairs by phone). Please confirm if that understanding is incorrect, and if incorrect, please let us know what repair systems are used by the merging entities. Has a decision been made as to whether the Merged Company is moving to MTG? If not, do Qwest and CenturyLink expect CLECs to move to MTG and then potentially move again after the merged company decides that issue (or if it has already decided on a different system)? These are the kind of questions that the company should be able to answer, and it should lay out those answers in a detailed plan as described by paragraph 12(a),

before proceeding with changes like this. We need these answers. This is the kind of the uncertainty that we tried to avoid by entering into the settlement agreement.

On the CMP call today, Qwest made clear that it plans to proceed with implementation of the replacement system (MTG) in CMP, despite these unanswered questions. Proceeding with MTG before the end of the 2-year period does not alleviate Qwest from taking all of the steps described in paragraph 12 and its subparagraphs before replacing or integrating Qwest OSS systems. On the CMP call, however, Qwest did not explain when the steps described in paragraph 12 and its subparagraphs would occur under Qwest's current plans, and deferred that question to you. Is Qwest's plan is to develop and implement MTG now and retire CEMR/MEDIACC after the two year period? Or, is Qwest proposing to retire them earlier than the end of the 2-year period? In either scenario, please provide a timeline showing when the steps in paragraph 12, 12a, 12b, and 12c will take place vis a vis the actions that the company is planning. On the CMP call, Integra asked Qwest to withdraw its CR to implement MTG ([http://www.qwest.com/wholesale/cmp/cr/CR\\_SCR121608-02.html](http://www.qwest.com/wholesale/cmp/cr/CR_SCR121608-02.html)), because replacing CEMR/MEDIACC is part and parcel of that CR, and because that CR provides for only limited testing. See *id.* (Description of Change states: "Implement new repair ticketing gateway to provide XML transactions replacing ticketing functionality currently supported by MEDIACC. . . . New application will include limited testing and also replace CEMR.") (emphasis added). Qwest did not commit to do so on the call, indicating it would take back this question. We await a response to these questions.

The merger settlement agreement provides that Qwest will maintain the same level of support and functionality (paragraphs 11 and 12). Implementing MTG may divert resources from maintaining CEMR/MEDIACC and may provide an incentive for Qwest to not maintain CEMR/MEDIACC to current levels. Please address this concern as well.

Karen