

**EXHIBIT BJJ-22 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

From: Huesgen, Jim
Sent: Sunday, February 20, 2011 2:52 PM
To: 'Mickens, Warren'
Cc: Cheek, Bill E[CTL]; Thornton, Roland
Subject: RE: Meeting next week regarding CEMRs

Warren,

I have enclosed a list of our questions per your request. We have requested much of this information previously, primarily via CMP. When Qwest provides this information via those channels or by email, we will review that information promptly and contact you shortly thereafter as to feasibility of a one on one meeting. Please review the enclosed list and let me know when Qwest has assembled additional information so that we may discuss next steps. Thanks.

Jim

Qwest Proposal to Retire MEDIACC/CEMR and Replace with MTG at this Time

1. Retirement at this Time. Why retire CEMR/MEDIACC now (as opposed to after two years, if at all)? We need a detailed understanding of the current systems and Qwest's reasons for proposing replacement.

- Identify the manufacturers and the vendors that support the operating system, database, software, and hardware; and provide the specification of each that CEMR/MEDIACC is currently residing on. If Qwest is the owner/developer/manufacture, identify Qwest.
- Provide documentation from each vendor/manufacture, in the form of public information (posted to its website for example) or communication the vendor has provided to Qwest, indicating that there are problems with CEMR/MEDIACC or that they will not be supported (or support will be on a best effort basis). Also provide documentation to indicate when this change took place. (When did the vendor/manufacture take this position? How long has Qwest known of this situation?)
- Provide documentation from each vendor/manufacture, in the form of public information (posted to its website for example) or communication the vendor has provided to Qwest, indicating that replacement parts are no longer available and parts must be cannibalized from used equipment purchased from dealers [Power Point (PP) presentation, p. 2.] How long has this been the case?
- Qwest provides a chart in its Power Point presentation that shows an "E" on the graph that presumably denotes the "END." Provide any documentation that shows that CEMR and MEDIACC are at or close too this cycle in the chart. (PP, p. 3.)
- Qwest said in CMP that CEMR/MEDIACC is not a "high availability system with fail over." Is that an accurate description? Is this a new development? If not, and this has been true for some time, why retire the system now and not after two years? Will the planned changes result in a high availability system with fail over?
- Qwest said it may defer retirement of CEMR/MEDIACC but did not provide specifics. Integra asked Qwest to instead withdraw its retirement Change Request. Will Qwest withdraw its retirement Change Request in CMP? If not, will Qwest defer it? If Qwest will defer it, we need to know the length of time it will be deferred. Will Qwest commit to defer it for at least two years? If not, for what time period does Qwest plan to defer it?
- Provide any other reasons, with supporting documentation, for the need to replace CEMR/MEDIACC at this time (and not after two years).

2. Transition to MTG. We need a detailed understanding of MTG and Qwest's plans to implement it. We need to know specifically what Qwest plans to implement and when, what testing is planned, how functionality will be confirmed by CLECs before implementation, and whether, how, and when CLECs will have a say/vote in accepting the replacement system (MTG) before implementation.

- Qwest indicated in CMP that MTG will be using the existing Qwest system (QPortal). Please confirm if that is correct and, if not, what will be used. If correct, does the existing Qwest system currently reside on a platform with high availability with failover?
- In CMP, Qwest was unable to answer to certain questions. If an existing Qwest system (QPortal) is used, then Qwest should be very familiar with that system, and information about that system should be readily available. For example, regarding the ability of the new system to run in a high availability with failover system (see previous bullet), Qwest must have this information if Qwest has this system already running in its IT infrastructure. In CMP, the Qwest Director of IT Infrastructure said that Qwest did not know the platform and/or environment the MTG system is going to be residing in. However, if this is an existing system in the Qwest IT network, the expectation is that there should be minimum system requirements available on the existing system to allow Qwest to provide more information to CLECs at this time. Please explain why, if Qwest is using the existing solution (Qwest Portal), more information is not available generally as to functionality and technical specifications. If information is available for this reason, please provide it.
- Qwest first initiated its Change Request (CR) in 2008, and it was five months into the process before Qwest deferred its CR. Qwest said in CMP that the reason more information is not available at this point, even though Qwest was five months into the process previously, was because under the earlier CR Qwest was building a new solution, and now Qwest is using an existing solution (QPortal, a Qwest affiliate system). If Qwest is not using the existing solution (Qwest Portal), please explain why more information is not available this far into the process, given the work previously performed by Qwest before it deferred its CR.
- Has Qwest determined the Industry Standard or Specifications it will be using for the Network testing transactions? Per a February 2nd Qwest email, Network Testing Transaction specifications were not yet identified. But, that distinction was no longer made in the slide presentation on Feb 16th, 2011. If available, please provide this information.
- Please clarify the following: If the timeline, as indicated by Qwest, is roughly 9-12 months for a hardware upgrade to the current system and the timeline is roughly 9-12 months for a new application, why did Qwest choose to implement the new system instead of simply upgrading the End of Life hardware, which would allow Qwest to retain the existing system (MEDIACC/CEMR)?
- Has Qwest notified the Wireline Competition Bureau of the FCC and the state commissions of its plan to replace CEMR/MEDIACC and, if not, does it plan to do so and when?
- What is Qwest's plan to ensure that data integrity is maintained?
- Does Qwest have contingency plans in the event Qwest encounters any significant problem with the planned transition to MTG and, if so, what are they?
- Please describe all testing of MTG that Qwest anticipates will occur and indicate when that testing will occur. It was unclear, but there was some suggestion in CMP that the schedule may slip. If the schedule proposed by Qwest in its CMP notice is changing, please provide the new proposed schedule.

- At what point in time (*e.g.*, at the time of retirement, or after two years), will Qwest provide for sufficient acceptance of the replacement interface (MTG) by CLECs to help assure that the replacement interface provides the needed level of service quality (including developing acceptance criteria, testing until the criteria are met, and a majority vote in CMP)? Please describe the timing of these events: (1) in the event that Qwest retires CEMR/MEDIACC in less than two years, and (2) in the event Qwest implements MTG earlier but retires CEMR/MEDIACC after two years.
- Please describe what training and education on MTG Qwest plans to provide and when Qwest will provide it.
- Does the company's desire to replace CEMR/MEDIACC with MTG relate to the company's plans post-merger? Is the merged company moving to MTG? If not, will CLECs have to move to MTG and move again? Integra understands 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.
- Provide any other reasons, with supporting documentation, for implementing MTG at this time, for the manner in which Qwest is implementing it, and for why more information is not available at this time (and address when it will be available).

3. Functionality of New System (MTG) After Implementation. We need a detailed understanding of the relative functionality of MTG to CEMR/MEDIACC. If Qwest believes that MTG is a more favorable system, then Qwest should provide specific information to persuade CLECs of the reasons to move to MTG at this time.

- Qwest described different functionalities for the existing (CEMR/MEDIACC) and proposed replacement (MTG) repair interface systems. (PP, pp. 5-10.) Although Qwest said that no functionality will be lost, Qwest needs to provide detailed information in advance to verify that is the case. Learning after the fact that functionality has been lost is too late.
- When describing the products that the GUI (CEMR) supports currently, the Qwest presentation includes only POTS, Voicemail and Broadband and does not include designed services. (PP, p. 6.) Please confirm that MTG GUI will allow repair ticket submission for all CLEC products and services, including the services that Qwest refers to as "design" services.
- For each function listed in the Qwest CEMR User Guide, provide a status on whether MTG will have the function upon implementation and whether there are any changes to the manner and timing in which the CLEC performs the function or receives information. For example, under the section Prevalidation in the CEMR User Guide, there is a function titled "Viewing Facility Information." Compare CEMR to MTG as to this functionality, address:

1. Will MTG allow CLEC to view facility information?
2. Will the CLEC input the same information to obtain this data as it does today with CEMR?

3. Will the information that MTG provides for this function be the same data, presented in the same manner?
 4. Will the response time be the same or better than the response time in CEMR?
 5. Will MTG change existing field auto-population?
 6. Will MTG change the availability of existing pull down menus?
 7. Will MTG change existing query options?
- Please provide the answers to questions 1-4 above as to all functions listed in the Qwest CEMR User Guide.
 - Please describe access and level of access to the new system that will be available to CLEC.

4. Relationship to Merger Agreement and Other Legal Issues. We anticipate that Qwest legal will also respond separately regarding the legal/regulatory issues.

- In written CMP comments and on CMP calls, Qwest directed 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. Therefore, Integra contacted the Qwest and CenturyLink legal folks with questions and looks forward to their response.
- CLECs using CEMR/MEDIACC need detailed information, and CMP allows a forum for Qwest to provide that information at a detailed level with operational personnel who participate in CMP. These issues are important for Integra, and not having received sufficient information in CMP to date, Integra has also separately contacted Qwest to attempt to receive more detailed information. Integra anticipates that the details will be shared with all parties who need it.
- Qwest needs to address how a solution, even if agreed upon operationally by all impacted CLECs, will be addressed with respect to the merger agreements and orders. To some extent, this issue has left the hands of any one party, as settlement agreements have been approved/incorporated in state commission orders, and other CLECs have opted in to the Integra agreement. Integra intends to comply with its agreement and the commission orders, and Integra would be concerned about any resolution that is inconsistent with the filed agreements and commission orders. If Qwest has a plan to address how these issues would be dealt with and brought to regulators as needed, please share that plan.

5. Change Management Process (CMP). We have requested that Qwest take certain actions in CMP. Please let us know if Qwest will take these actions and, if not, what course Qwest will follow.

- Withdraw Qwest's CR to retire MEDIACC for at least 2 years.
- Withdraw Qwest's CR to implement MTG, because replacing CEMR/MEDIACC is an integral part of that CR, and
- If Qwest intends to implement MTG, submit a new CR that contains a better, more detailed description.