EXHIBIT BJJ-26 TO THE

DIRECT TESTIMONY OF

BONNIE J. JOHNSON

ON BEHALF OF

INTEGRA TELECOM

Qwest

March 10, 2011

Bonnie Johnson
Eschelon Telecom
Eschelon Telecom of Arizona Inc.
Eschelon Telecom of Colorado Inc.
Eschelon Telecom of Minnesota Inc.
Eschelon Telecom of Oregon Inc.
Eschelon Telecom of Utah Inc.
Eschelon Telecom of Washington Inc.
730 2nd Avenue South - Suite 900
Minneapolis, MN 55402
bjjohnson@integratelecom.com

TO:Bonnie Johnson

Announcement Date:	**March 10, 2011**
Effective Date:	**September 19, 2011**
Notification Number:	**SYST.MEDI.03.10.11.F.08921.Resp_Addl_Commnts_MTG**
Notification Category:	**Systems Notification**
Target Audience:	**CLECs, Resellers**
Subject:	**CMP – Qwest response to Additional CLEC comment cycle on Maintenance Ticketing Gateway (MTG) 1.0 - New Application to Application Interface Preliminary Systems Release Information**
Associated CR # or System Name and Number:	**MTG Release 1.0 Qwest CR# SCR121608-02**

On March 10, 2011, Qwest is providing the Qwest response to the additional CLEC comment cycle on the Maintenance Ticketing Gateway (MTG) 1.0 Preliminary Release information. The second comment period was announced via System Notification SYST.MEDI.01.20.11.F.08765.AddlCmmntsCycleMTG_Intrfc distributed on January 20, 2011. The Qwest response to comments associated with that notice is available on the Wholesale Document Review Archive site at http://www.qwest.com/wholesale/cmp/review_archivesystem.html.

The initial functionality of the Maintenance Ticketing Gateway (MTG) includes:

- Providing an effective mechanism to automate communication and the processing of trouble ticket information
- Implementing electronic trouble ticketing capabilities with Qwest for the exchange of Trouble Ticket information for various Qwest products and services purchased by the customer
- Providing an electronic bonding facility that enables Qwest customers to use their own repair/ticketing system to manage troubles on their Qwest products and services.

The benefit of this new application will allow Qwest and Wholesale customers to use a more advanced type of technical communication based on internet standard protocols, web services, and telecommunications industry standard markup languages.

A phased implementation is planned.

Supporting Material:
Change Request SCR121608-02 is contained in the Systems Interactive Report posted to the Qwest Web site
at http://www.qwest.com/wholesale/cmp/changerequest.html.

Timeline:

Preliminary Systems Release Notification Provided	See notification number SYST.MEDI.12.17.10.F.08642.MTG_ IntrfceNewApptoApp.	December 17, 2010
CLEC Comment Cycle began		December 17, 2010
CLEC Comment Cycle ended		January 6, 2011 5:00 p.m. MT
Qwest Response to CLEC Comments		January 13, 2011
Qwest/CLEC Preliminary Implementation Plan Review Meeting	Review meeting to provide an informational overview and answer CLEC questions on the Preliminary Implementation Plan. All relevant Qwest SMEs will be in attendance and CLEC SMEs are encouraged to participate.	**HELD** January 19, 2011 1:00 - 2:00 p.m. MT BY TELECONFERENCE ONLY: 1 866-789-8819 Conference ID 6273158#
Additional CLEC Comment Cycle began	See notification number SYST.MEDI.01.20.11.F.08765.AddlCmmntsCycleMTG_Intrfc.	January 19, 2011
Additional CLEC Comment Cycle ended		February 2, 2011 5:00 p.m. MT
Additional Qwest Response to CLEC Comments	**NOTE:** The response to additional CLEC comments was originally planned for February 9, 2011 however, on that date, Qwest issued a delayed response to comments. See notification SYST.MEDI.02.09.11.F.08824.DelaydRespCommtsMTG_Rel1.	**March 10, 2011**
Draft Interface Technical Specifications Issued		May 20, 2011
Comment cycle starts		May 20, 2011
Qwest/CLEC Walk Through	Specific time and call in information to be provided with the Draft Technical Specifications	June 2, 2011
Comment cycle ends		June 7, 2011

Final Technical Specifications Issued	Includes response to CLEC comments, if applicable	June 11, 2011
Initial GUI Release Notice Issued		August 5, 2011
Application to Application Testing Available		August 20, 2011
Draft GUI Release Notes Issued		August 22, 2011
GUI Comment Cycle Starts		August 22, 2011
GUI Overview Conducted		August 23, 2011
GUI Comment Cycle Ends		August 25, 2011
Final GUI Release Notes Issued	Includes response to CLEC comments, if applicable	August 29, 2011
Targeted Production Date		September 19, 2011

If you have any questions on this subject, please submit comments though the following link: http://www.qwest.com/wholesale/cmp/comment.html.

Sincerely,

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement, the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

To view your Qwest Wholesale notifications online, please log into our ANR (Accessible Notices Repository) at : http://notices.qwestapps.com.

If you would like to subscribe, unsubscribe or change your current profile to Qwest Wholesale mailouts please go to the 'Subscribe/Unsubscribe' web site and follow the subscription instructions. The site is located at:

http://www.qwest.com/wholesale/notices/cnla/maillist.html

cc: Stephanie Smith

Maryann Wiborg or Rita Urevig

Qwest Communications, 120 Lenora St, 11th Floor, Seattle WA 98121

Qwest Response to Document In Review

Comment Response Date:	March 10, 2011
Document Subject:	CMP -- Additional Comments Cycle on Maintenance Ticketing Gateway (MTG) 1.0 - New Application to Application Interface Preliminary Systems Release Information
Initial Notification Date:	January 20, 2011
Initial Notification Number:	SYST.MEDI.01.20.11.F.08765.AddlCmmntsCycleMTG_Intrfc
System Release Number:	MTG Release 1.0 Qwest CR# SCR121608-02

Qwest recently posted proposed updates to MTG Release 1.0 associated with Qwest CR# SCR121608-02. CLECs were invited to provide additional comments to these proposed changes during a Document Review period from January 19, 2011 through February 2, 2011. On February 9, 2011, Qwest issued system notification **SYST.MEDI.02.09.11.F.08824.DelaydRespCommtsMTG_Rel1** indicating there would be a delayed response to comments. The information listed below is Qwest's Response to CLEC comments provided during the review/comment cycle.

<u>Resources</u>:

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.

Qwest's Response to Comments on
SYST.MEDI.01.20.11.F.08765.AddlCmmntsCycleMTG_Intrfc.

#	CLEC Comment	Qwest Response
1	**PAETEC** **February 1, 2011** SEE FORMATTED DOCUMENT #1 BELOW THAT INCLUDES PAETEC COMMENTS.	SEE FORMATTED DOCUMENT THAT FOLLOWS THAT INCLUDES THE QWEST RESPONSE.
2	**INTEGRA** **February 2, 2011** SEE FORMATTED DOCUMENT #2 BELOW THAT INCLUDES INTEGRA COMMENTS.	SEE FORMATTED DOCUMENT THAT FOLLOWS THAT INCLUDES THE QWEST RESPONSE.
3	**INTEGRA** **February 20, 2011** SEE FORMATTED DOCUMENT #3 BELOW THAT INCLUDES INTEGRA COMMENTS.	SEE FORMATTED DOCUMENT THAT FOLLOWS THAT INCLUDES THE QWEST RESPONSE.

[NOTE: QWEST RESPONSE PROVIDED IN BLUE]

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.

Qwest Response: As stated in our Response to Comments on January 13, 2011 and in our
Preliminary Plan Review Meeting on January 19, 2011, detailed functional and technical
information is not available at this time. However, Qwest will be delivering the same
functionality as that provided via the applications of both MEDIACC and CEMR. Detailed
specifications are scheduled to be provided as part of the Draft Technical specifications on
May 20, 2011.

Per current service level agreements, MTG will perform to the same level of automated, real-
time information exchange as occurs today between Qwest and CLECs.

During the February 16, 2011 monthly CMP meeting, a Powerpoint document titled "MTG
CEMR/MEDIACC Repair System Improvements" was reviewed. A slightly revised version

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[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.

of that document has been posted as part of this Qwest response to comments along with more extensive information in response to Integra comments.

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?

Qwest Response: As part of the documentation of the MTG Preliminary Implementation Plan provided as part of the Preliminary walkthrough conducted on January 19, 2011 (available at http://wholesalecalendar.qwestapps.com/detail/287/2011-01-19), Qwest provided the ATIS specifications that will be used by MTG as part of the application to application interface. Qwest cannot speak to changes required to PAETEC back office systems however it is likely that PAETEC will be required to change their translations to create XML instead of CMIP format and PAETEC communications protocols may require changing to communicate using XML via WEB.

Testing of the application to application functionality will be available for a month prior to MTG initial implementation, as noted in the preliminary timelines that have been provided. Qwest will work with each CLEC to ensure a successful migration to the new MTG interface, whether GUI or application to application, prior to any retirement, including an additional 12 months on top of the CMP requirement if necessary.

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.)

Qwest Response: See response to Question #2 above.

4) 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?

Qwest Response: Qwest is currently determining the testing approach that will be used prior to conversion and implementation however, Qwest will not be utilizing a third party. As stated in both the December 2008 and in the January 2011 Preliminary Implementation Plan meeting, there will be a phased implementation of MTG. Similar to how Qwest installs IMA releases today, Qwest will periodically migrate customers to the new platform after testing in a controlled testing environment that allows CLECs to test specified transactions.

Qwest has deferred the MEDIACC Retirement CR SCR121608-01 until post MTG implementation. The timeline for CEMR/MEDIACC retirements will be over 450 days from today. In addition to the 450 days, Qwest will work with each CLEC to ensure a successful migration to the new interface, whether GUI or application to application, prior to any retirement, including an additional 12 months on top of the CMP requirement if necessary. Qwest reserves the right under CMP requirements to request an earlier retirement of any application in the event all users have migrated off the old application.

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5) What are the time, costs, and resources that will be required of CLECs *to implement* the proposed MTG replacement?

Qwest Response: Qwest cannot estimate the time, costs, and resources that will be required of CLECs to implement MTG. As identified, Qwest is following the process required in Section 7 of the CMP Document to introduce and implement a new OSS interface.

6) What are, if any, the increased time, costs, and resources that will be required of CLECs *to maintain* MTG over MEDIACC/CEMR?

Qwest Response: Qwest cannot estimate the time, costs, and resources that will be required of CLECs to implement MTG. As identified, Qwest is following the process required in Section 7 of the CMP Document to introduce and implement a new OSS interface.

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.

COMMENT #2 - Integra Comments received February 2, 2011 on
SYST.MEDI.01.20.11.F.08765.AddICmmntsCycleMTG_Intrfc (Associated CR#: MTG Release 1.0 Qwest
CR# SCR121608-02)

[NOTE: QWEST RESPONSE PROVIDED IN BLUE]

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.

Qwest Response: As stated in our Response to Comments on January 13, 2011 and in our Preliminary Plan Review Meeting on January 19, 2011, detailed functional and technical information is not available at this time. However, Qwest will be delivering the same functionality as that provided via the applications of both MEDIACC and CEMR. Detailed specifications are scheduled to be provided as part of the Draft Technical specifications on May 20, 2011.

Per current service level agreements, MTG will perform to the same level of automated, real-time information exchange as occurs today between Qwest and CLECs.

During the February 16, 2011 monthly CMP meeting, a Powerpoint document titled "MTG CEMR/MEDIACC Repair System Improvements" was reviewed. A slightly revised version of that document has been posted as part of this Qwest response to comments along with more extensive information in response to additional Integra comments.

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 it 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.

Qwest Response: In regard to these comments associated with the Merger Settlement Agreement executed by Qwest, CenturyLink and Integra, Qwest did not bring this issue up in CMP and stands by the assertion that matters associated with Merger agreements should be addressed to and by the Qwest or CenturyLink Legal Departments and not via CMP.

Integra questions and the Qwest response on the 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/manufacturer, identify Qwest.	**QWEST RESPONSE** • MEDIACC Operating system is HP-UX 10.20, which is **not** supported by the vendor. • MEDIACC hardware is HPK460 which is supported by the vendor at a best effort level. • The database used by MEDIACC is Sybase 11.5.1, which is **not** supported by the vendor. • The Sybase database runs on HPK460 servers which are supported by the vendor at a best effort level. • The Sybase database runs on Operating system HP-UX-10.20, which is **not** supported by the vendor. • The database used by CEMR is Oracle 10.2.0.4, which is **not** supported by the vendor. • The operating system for the Oracle DBMS is Redhat AS 3, which is **not** supported by the vendor. • The hardware for the Oracle DBMS is an IBM Blade HS20 type 8842 Model 11u, which is supported by the vendor. • The CEMR Operating system is Redhat 5.5, which is supported by the vendor. • The CEMR hardware is IBM LADE HS21 type 8853 Model L5U, which is supported by the vendor, and HP Blade BL640C G1 which is supported by the vendor. • The software used by both systems is CMIP Toolkit: Vertel 2.1.1, which is **not** supported by the vendor, which is no longer in business. • Both CEMR and MEDIACC are Qwest developed applications, running on the hardware and operating systems specified above, using the databases specified above, and using the CMIP Toolkit specified above.
• Provide documentation from each vendor/manufacturer, 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	• Qwest is continuing to work with appropriate vendors to gather this information.

documentation to indicate when this change took place. (When did the vendor/manufacturer take this position? How long has Qwest known of this situation?)	
• Provide documentation from each vendor/manufacturer, 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 is continuing to work with appropriate vendors to gather this information.
• 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.)	• The fact that hardware used to support MEDIACC is over 12 years old supports that the hardware is at end of life (see above).
• 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?	• The CEMR/MEDIACC applications are targeted at a 99.5% overall availability; however, fail-over requires manual processes, and failure results in outages.
• 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?	• As stated in the February CMP call, Qwest does agree to place the MEDIACC retirement CR in a Deferred status until after the implementation of MTG, at which point Qwest will evaluate the transition of customers to MTG and working with the CLECs will determine next steps for retirement of both CEMR and MEDIACC. The deferment of the CEMR/MEDIACC CR occurred the week of February 28. • To clarify: by deferring the MEDIACC CR until post implementation, the timeline for CEMR/MEDIACC retirements based on CMP requirements would be over 450 days from today. In addition to the 450 days, Qwest will work with each CLEC to ensure a successful migration to the new interface, whether GUI or app-to-app, prior to any
	retirement, including an additional 12 months on top of the CMP requirement if necessary. Qwest reserves the right under CMP requirements to request an earlier retirement of any application in the event all users have migrated off the old

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	application.
	• Once the improved system becomes available and is proven in testing with CLECS to provide full functionality, Qwest will measure PID/PAP performance based upon the new improved system.
• Provide any other reasons, with supporting documentation, for the need to replace CEMR/MEDIACC at this time (and not after two years).	• As stated in the February CMP meeting, the hardware, Operating system, database and software are old and thus more likely to fail (see above). Qwest would like to replace the systems before failure becomes a chronic problem that significantly impacts not only Qwest but the CLECs. This is a proactive effort to prevent problems before they ramp up – given the age of our systems and the advice of our IT team, when problems do occur they could ramp up quickly and impact our business, as Qwest uses CEMR and MEDIACC just like the CLECs do.

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?	**QWEST RESPONSE** • Qwest plans to add CEMR functionality to QPortal, an existing platform used by thousands of customers today. The QPortal Platform is hosted on multiple systems that allow automatic failover in the event of a problem, thus ensuring improved system availability in the event of a system failure. As stated above, CEMR/MEDIACC do not have this automatic failover capability and failure results in outages.
• In CMP, Qwest was unable to answers 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	• Qwest will ensure that a QPortal expert is available to respond to CLEC questions at the next CMP meeting, and any other meetings CLEC's request to discuss the functionality of QPortal. If there are specific questions regarding QPortal functionality directed to Qwest in writing, responses will be returned in writing. Availability of QPortal is listed above. • QPortal is branded as QControl, and that is the name the system is known by for Qwest national customers. • Qwest can provide the student guide for QControl to customers if they would like to see it. However, the functionality described in the QControl student guide only describes functionality in existence today, and does not yet include functionality for the replacement systems.
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	Therefore, the QControl student guide would be an example of how the current system works, but would not represent any functionality for the improved CEMR/MEDIACC release at this time. Documentation

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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.	and training will be provided according to the preliminary timeline provided in the presentation at the February CMP meeting, and it is posted as part of this response to comments. • QControl is a web based system that can be accessed by any system that supports IE 7.0 or higher, or Firefox 3.5 or higher.
• 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.	• As discussed in the February CMP meeting, the prior solution was to build from scratch a replacement system, which was determined to be time consuming and costly. The new approach is to add existing CEMR/MEDIACC functionality to existing systems for stability and ease of implementation. CEMR functionality will be added to the QPortal platform, and existing portal external customers use in the OOR/National business to access customer information. QPortal is a stable and user friendly web-based portal utilized by thousands of customers today. MEDIACC functionality will be added to the Qwest customer ticketing Gateway which is currently used by BMG customers to communicate repair information in an app-to-app environment. • The preliminary timeline of the current project was provided in the presentation provided in the February CMP meeting, and it is also posted as part of this Qwest response to comments. The timeline indicates that requirements were just completed, design is just starting. Information available at the end of the requirements phase was also provided in this presentation. More information will be forthcoming as the project progresses, also as noted in the preliminary timeline.
• 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 see ATIS-0300002 XML Schema Interface for POTS Service Test.
• 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	• Where the hardware and databases can be upgraded in the interim to reduce risk, it has been, as is demonstrated in the answers above regarding hardware and operating systems. However, the database used by MEDIACC can't run on newer hardware and operating systems, and therefore the application needs to be rewritten to utilize a newer database.

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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?	• Qwest has no obligation to do so.
• What is Qwest's plan to ensure that data integrity is maintained?	• Qwest will test this enhanced system to ensure data integrity, prior to implementation, and CLECs will have the opportunity to run in parallel, per the requirements of the CMP process, to ensure data integrity has been maintained in the transition.
• 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?	• CEMR/MEDIACC and the improved system will be running in parallel until the improved system has been validated.
• 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.	• As mentioned in the CMP meeting, requirements were just completed in mid-February, and the system design phase of the project started this month, so test plans are not completed at this time. Qwest system testing will occur in the development phase of the project, the timeframe for which is included in the presentation provided in the February CMP meeting and posted in conjunction with this response to comments Additionally, once the system becomes available, CLECs will have the opportunity to run parallel and test all functionality. Also, testing of the app-to-app functionality will be available for a month prior to initial implementation, as noted in the preliminary timeline provided in the presentation.
• Please see the preliminary timeline for testing dates. In order to provide a high quality software product to the CLEC, Qwest reserves the right to change the schedule to accommodate any development schedule changes. Any changes to the preliminary schedule will be provided in the monthly CMP meeting.
• 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	• Acceptance of the new interface will occur according to existing CMP/software development processes. The preliminary timeline was provided in the presentation in the February CMP meeting and is posted as part of this response to comments

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.	• As mentioned in the February CMP meeting, and documented in the presentation provided at that meeting, training and education of the new interface will be provided according to the preliminary timeline provided, currently tracking in the late August timeframe. The delivery method of the training will be determined by overall needs and availability, i.e. web, instructor, or conf call based on demand.
• 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.	• The replacement of the CEMR/MEDIACC software has been under review at Qwest since 2008, due to the age of the hardware, operating system database, software and standards used. The current iteration of the replacement project was initiated in response to IT information the system had reached end of useful life and needed to be replaced. • Efforts are underway to review all systems to determine systems that will be used going forward. Information on future systems will be shared as it becomes available. Qwest suggests that questions related to CenturyLink or Embarq repair systems or processes be directed to CenturyLink, as Qwest cannot claim to know Century Link systems or processes as well as they do.
• 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).	• As discussed in the February CMP meeting, and documented in the preliminary timeline in the presentation provided for that meeting, the project has just completed the requirements phase and has just entered the design phase. As the design phase is completed, more detail will become available, as itemized in the preliminary timeline provided in the presentation at that meeting. A copy of the presentation is posted as part of this response to comments. The preliminary timeline is on slide 4.

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/MEDDIACC) 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.	**QWEST RESPONSE** • The requirements for the improved system have derived from the existing CEMR/MEDIACC functionality. The system will be evaluated via formal testing against these requirements.

• 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.	• All functions for design services that exist in the current CEMR/MEDIACC system will be included in the improved system. Designed Services will be included, and are detailed in slide 7 of the presentation posted associated with this response. This information was inadvertently omitted in the February CMP meeting copy of the presentation.

• 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?
	• The requirements for the improved system have derived from the existing CEMR/MEDIACC functionality. While the look and feel of the improved GUI may be slightly varied from CEMR, existing query capabilities will be maintained. The presentation provided in the February CMP meeting describes the functionality that will be provided. It is posted as part of this response to comments.

• Please provide the answers to questions 1-4 above as to all functions listed in the Qwest CEMR User Guide.	Please see response above.
• Please describe access and level of access to the new system that will be available to CLEC.	Qwest will provide system access detail when available, but as mentioned in the February CMP meeting and detailed in the preliminary timeline provided in the

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	presentation for that meeting, system design has just started and so that information has not been created at this time.

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.	**QWEST RESPONSE** This question is outside of the scope of CMP.
• 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.	• A preliminary timeline of the project and availability of documentation and training are provided in the presentation provided at the February CMP meeting and has also been posted as part of this response to comments. • If there are specific questions that Integra would like to state, please forward them. Answers will be provided as soon as they are available, but as noted in the preliminary timeline, the system design and development is not yet complete, which precludes answers to many questions at this time. As indicated previously, the timeline for system design and development is noted in the preliminary timeline.
• 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.	• Questions regarding the merger agreements are outside of the scope of CMP.

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.	**QWEST RESPONSE** • As stated in the February CMP call, Qwest did agree to place the MEDIACC retirement CR in a Deferred status until after the implementation of MTG, at which point Qwest will evaluate the transition of customers to MTG and working with the CLECs will determine next steps for retirement of both CEMR and MEDIACC. The deferment of the CEMR/MEDIACC CR occurred the week of February 28. • To clarify: by deferring the MEDIACC CR until post implementation, the timeline for CEMR/MEDIACC retirements based on CMP requirements would be over 450 days from today. In addition to the 450 days, Qwest will work with each CLEC to ensure a successful migration to the new interface, whether GUI or app-to-app, prior to any retirement, including an additional 12 months on top of the CMP requirement if necessary. Qwest reserves the right under CMP requirements to request an earlier retirement of any application in the event all users have migrated off the old application. • Once the improved system becomes available and is proven in testing with CLECS to provide full functionality, Qwest will measure PID/PAP performance based upon the new improved system.
• Withdraw Qwest's CR to implement MTG, because replacing CEMR/MEDIACC is an integral part of that CR, and	• In reviewing the title and description of the MTG CR, there is no mention of replacement or retirement in the title. The description does contain the word replacement which will be removed through an update to the CR. At this point Qwest does not intend to withdraw the CR and re-issue.
• If Qwest intends to implement MTG, submit a new CR that contains a better, more detailed description.	• Qwest will continue to provide additional information in the description of the CR for MTG as it becomes available throughout the project. Qwest does not intend to withdraw or re-submit a new CR.

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