

**EXHIBIT BJJ-30 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

From: Johnson, Bonnie J.
Sent: Friday, March 18, 2011 3:34 PM
To: 'cmpcr@qwest.com'; Urevig, Rita
Cc: julia.redman-carter@paetec.com; Isaacs, Kimberly D.; 'Jim Hickle'; 'Greg Darnell'; Karrie Willis; 'Cox, Rod'; 'Bloemke, Brenda'; Liz Tierney (etierney@covad.com); Johnson, Bonnie J.; Denney, Douglas K.
Subject: SYST:MEDI:Response to Additional Comment Cycle Maintenance Ticketing Gateway: Eff 09-19-11

Enclosed is Integra's reply to Qwest's delayed response dated March 10, 2011. Integra is one of the CLECs that submitted comments in February in CMP. Later, Integra also summarized its questions for Qwest and provided them to Qwest and CenturyLink executives on February 20, 2011. As part of Qwest's March 10, 2011 CMP response, Qwest included Integra's February 20, 2011 questions and Qwest's responses to them. This is Integra's first opportunity, therefore, to review and respond in CMP to Qwest's March 10, 2011 information provided in response to those Integra questions. Please ensure that Integra's enclosed reply is posted to the website in CMP as part of the CR Detail for this CR.

I am also providing Integra's Reply to you, Rita. If there is any comment or question that Qwest believes is outside the scope of CMP, please ensure that the appropriate personnel at Qwest receive and respond to the enclosed document.

Thank you,
Bonnie

Bonnie Johnson | Director Carrier Relations
direct 763.745.8164 | fax 763.745.8459
Integra Telecom | 6150 Golden Hills Drive | Golden Valley, MN 55416-1020
bjjohnson@integratelecom.com



From: mailouts2@qwest.com [mailto:mailouts2@qwest.com]
Sent: Thursday, March 10, 2011 3:45 PM
To: Johnson, Bonnie J.
Subject: SYST:MEDI:Response to Additional Comment Cycle Maintenance Ticketing Gateway: Eff 09-19-11

Qwest Proposal to
Retire MEDIACC/CEMR and Replace with MTG
March 18, 2011

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.

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<p>a. 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.</p>	<ul style="list-style-type: none"> • 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 	<p>Regarding Qwest's assertion that certain vendors do not provide support, Integra requested documentation to support Qwest's claim. Qwest did not post a document with some vendor information to its website until March 15 or March 16, 2011. Qwest provided no explanatory information with the document. A preliminary review of that document suggests that, to the extent a problem with CEMR/MEDIACC exists, any alleged problem may be of Qwest's own making. Qwest appears to have had options available to it to avoid the situation it claims exists today. Qwest developed the CEMR and MEDIACC applications, and Qwest has not shown whether it explored all options to maintain and upgrade them as needed and, if not, why not. Choices on Qwest's part should not result in a shifting of expenses to CLECs to move systems when a move may not be or have been necessary.</p> <p>In any event, before CEMR/MEDIACC may be replaced, the company must adhere to the requirements of the merger settlement agreements, including paragraph 12 and subparts of the Integra agreement. This is true regardless of the reason for the replacement and regardless of whether any or all CLECs have migrated to a different system. See, e.g., Row 2(f) & §4.</p>

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<p>b. 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/MEDIAACC 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/manufacturer take this position? How long has Qwest known of this situation?)</p>	<p>Typc 8853 Model L5U, which is supported by the vendor, and HP Blade BL640C G1 which is supported by the vendor.</p> <ul style="list-style-type: none"> 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 MEDIAACC 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. <p>Qwest is continuing to work with appropriate vendors to gather this information.</p>	<p>Qwest did not post a document with some vendor information to its website until March 15 or March 16, 2011. Qwest provided no explanatory information with the document. Integra continues to review it. The document does not adequately support that the alleged situation exists or was unavoidable. See Row 1(a). For example, the Qwest document states that HP-UX10.20 Operating System support ended in June of 2003. Qwest does not explain why, if that is the case, it has taken Qwest more than <i>seven years</i> to do something about it. See also Row 2(l).</p>
<p>c. 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</p>	<p>Qwest is continuing to work with appropriate vendors to gather this information.</p>	<p>Qwest did not post a document with some vendor information to its website until March 15 or March 16, 2011. Qwest provided no explanatory information with the document. Integra continues to review it. The document does not adequately support that the alleged situation exists or was unavoidable. See Row 1(a). For example, the</p>

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<p>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?</p> <p>d. 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 to this cycle in the chart. (PP, p. 3.)</p>	<p>The fact that hardware used to support MEDIACC is over 12 years old supports that the hardware is at end of life (see above).</p>	<p>Qwest document states that HP-UX10.20 Operating System support ended in June of 2003. Qwest does not explain why, if that is the case, it has taken Qwest more than <i>seven years</i> to do something about it. See also Row 2(l). Qwest provided no documentation in response to this Integra request for documentation. Qwest relies on the fact that CEMR/MEDIACC are 12 years old for its position. Are there any other OSS at Qwest that are approximately that old or older? (For example, IMA is at least 12 years old, correct?) Is Qwest claiming any of them are at the end of their life?</p>
<p>e. 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?</p>	<p>The CEMR/MEDIACC applications are targeted at a 99.5% overall availability; however, fail-over requires manual processes, and failure results in outages.</p>	<p>Qwest does not answer all of the questions, and does not answer any question fully. Integra's questions are ongoing. Qwest admitted in CMP that there were fewer outages last year than there have been in any other year since 2003.</p>
<p>f. 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</p>	<ul style="list-style-type: none"> 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. 	<p><i>First bullet:</i> Qwest over-states Qwest's statements on the February CMP call. As reflected in the Qwest-prepared meeting minutes from that call, Qwest said it "may" place the MEDIACC CR in a Deferred status, and Qwest did not commit on the call to any time period for the length of the deferment. A deferment occurs when Qwest changes the status in the CR Detail on its website, and that did not occur until March.</p>

<p>INTEGRA 2/2/011</p> <p>plan to defer it?</p>	<p>QWEST 3/10/11</p> <ul style="list-style-type: none"> 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. 	<p>INTEGRA REPLY 3/18/11</p> <p><i>Second bullet (except last sentence):</i> Deferring the MEDIACC CR as described by Qwest is not fully documented and does not satisfy the terms of the Qwest-CenturyLink-CLEC merger settlement agreements. Qwest appears to be creating its own process and own timeline (potential "additional 12 months"), but Qwest is required to adhere to the processes outlined in the settlement agreements. If CLECs cannot rely upon the timeframes in the merger settlement agreements, how can CLECs rely on the 450-day or 12-month claim? (Regarding the "12 months," see Row 4c.) Additionally, does deferring the MEDIACC CR until post-implementation of a new system (MTG) cause the timeline changes that Qwest describes in its second bullet point, even if Qwest defers rather than withdraws its CR? An electronic search of the CMP Document shows there is no reference to "450," so presumably Qwest selected and added together other timeframes, if Qwest is using the CMP Document. Please provide citations to the sections of the CMP Document supporting the 450-day time period and show how Qwest has calculated it. CLECs do not know at this time how Qwest may later claim a deferment affects the timeline. Specifically state how Qwest calculated the start of the 450-day period and whether it takes into account any activity to date (given that Qwest is deferring a CR and not initiating a new CR, as requested). When Qwest states that it will work with CLECs, does this include, for example, a majority vote of participants in CMP? It does not appear so, because Qwest refers to working with "each CLEC." Please address when a majority vote in</p>
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	<p>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.</p>	<p>CMP will occur before retirement/replacement of CEMR/MEDIACC. Paragraph 12(c)(i) of the approved Qwest-Integra merger settlement agreement provides (with emphasis added) that the "replacement or retirement of a Qwest OSS Interface <i>may not occur</i> without sufficient acceptance <i>of the replacement interface</i> by CLECs to help assure that the replacement interface provides the level of wholesale service quality provided by Qwest prior to the Closing Date." There is no exception such as if CLECs have migrated off of a particular system earlier. According to its statement in Row 2(l), Qwest has been reviewing this issue since 2008, but Qwest requested and received no exception to paragraph 12 before Qwest executed the merger settlement agreement. Per Paragraph 12, Qwest must continue to use and offer, and can never retire or replace, CEMR and MEDIACC if Qwest does not comply with the commission-approved merger agreement procedures. Therefore, Qwest needs to answer Integra's repeated question as to the timing of when Qwest will take each step outlined in paragraph 12. Integra needs this information to plan for its own business needs.</p> <p><i>Second bullet (last sentence):</i> Qwest does not have the right it claims to be reserving. Qwest's commitments in the merger agreements include but also add to CMP requirements. There is a saying about seeking forgiveness rather than permission. That is not an acceptable approach here. These issues need to be dealt with in advance and not after the fact. In fact, CLECs believe they <i>have</i> been dealt with, via the merger settlement agreements, and Qwest still has not</p>

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	<ul style="list-style-type: none"> 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. 	<p>explained why it is acting as though that is not the case. (See Section 4.) Qwest also fails to explain how implementing a new, replacement system and migrating all CLECs to that system is anything other than retiring and replacing the old system, except as a matter of semantics to avoid certain obligations.</p> <p><i>Third bullet:</i> Qwest refers to an "improved" system, but Qwest has not yet demonstrated that the new system will be an improvement. Qwest refers to "testing." Qwest should perform parallel testing (old versus new) and compare the two. That way, CLECs will not have to wait until it is too late to learn whether the system replacement adversely affects wholesale performance. Will the testing conform to the requirements of paragraph 12 and subparts of the Qwest-Integra merger settlement agreement, as well as any longer timeframes or additional requirements in other merger settlement agreements? What steps will Qwest take to ensure that use of a new system will not change how PID/PAD data is collected, calculated, etc.?</p>
<p>g. Provide any other reasons, with supporting documentation, for the need to replace CEMR/MEDIAACC at this time (and not after two years).</p>	<p>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 the 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 MEDIAACC just like</p>	<p>See above. Integra requested information earlier and summarized its requests for Qwest on February 20, 2011. Although Qwest did not respond until March 10, 2011 (later for vendor information), Qwest provided little new information. To the extent that Qwest "would like to replace the systems" before the timeframes for replacing them in the merger settlement agreements, or with different or other procedures from those described in paragraph 12 and other settlement agreements, Qwest needs to work more collaboratively with CLECs to mutually</p>

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	the CLECs do.	agree upon a solution. To date, Qwest is announcing unilateral plans, rather than mutually developing them. Qwest's response indicates that issues could impact a CLEC's business, and impact it quickly, so CLECs need to be intimately involved. An alleged problem cannot become an excuse to provide less functionality or to ignore certain obligations without taking appropriate steps to have those obligations modified to meet the identified, specific need. (See Section 4.) As Qwest is relying on the age of the OSS as its reason for the alleged replacement need, Qwest in some respects cannot distinguish this situation from other OSS of the same or similar age. If Qwest sets a precedent in this situation of proceeding ahead of merger agreement timelines or without obtaining consent and approval for modifications of obligations, what precludes Qwest from doing so for any other OSS? Do Qwest and/or CenturyLink distinguish CEMR/MEDIAACC and, if so, how?
<p>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.</p>		
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<p>a. 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?</p>	<p>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/MEDIAACC do not have this automatic failover capability and failure results in outages.</p>	<p>Given that Qwest confirms it is using an existing platform to implement the new system (MTG), why hasn't Qwest provided more information in response to CLEC questions? See next Row. Although Qwest says that QPortal has been used by thousands of customers, Qwest admits that QPortal has not been used by customers for the functionality provided to CLECs by CEMR/MEDIAACC. See Row 2(b). With respect</p>

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<p>b. 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 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.</p>	<ul style="list-style-type: none"> 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. 	<p>to outages, Qwest admitted in CMP that there were fewer outages last year than there have been in any other year since 2003.</p> <p><i>First bullet:</i> Qwest waited until March 10th to indicate that it will have a QPortal expert at the March 16th CMP meeting. CLECs nonetheless asked questions during the CMP meeting, but Qwest's QPortal experts were unable to answer them. Qwest said that Qwest is not yet prepared to answer any questions about MTG (via QPortal platform). Qwest needs to extend the timeline accordingly. It is unclear why Qwest's QPortal "experts" were unprepared to answer certain questions. For example, on the CMP call, Integra asked whether, with MTG via QPortal, a CLEC will have to log out of the repair module to view a DLR, validate a CFA, or obtain demark information. Given that Qwest has represented that MTG will have at least the same functionality as CEMR/MEDIACC, the Qwest experts should have been able to answer immediately that, no, a CLEC would not have to log out for these tasks, because they do not have to log out to perform them today with CEMR. Qwest's failure to provide this response causes concern. When Qwest is able to answer questions, Qwest should provide detailed written materials in advance of a CMP meeting at which Qwest's QPortal experts will be prepared to answer questions. At a minimum, Qwest's QPortal expert should give a detailed presentation (with written materials provided in advance to allow CLEC preparation) describing the QPortal Platform, the "CEMR functionality" to be implemented in the new system MTG, how and when CEMR functionality will be added to</p>

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	<ul style="list-style-type: none"> • 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. 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 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. <p>QControl is a web based system that can be accessed by any system that supports IE 7.0 or</p>	<p>QPortal/MTG, and when CEMR/MEDIACC will be replaced with the new system. A written comment cycle should be established afterward so that CLECs have a fair opportunity to comment on the information provided by Qwest's QPortal expert and for Qwest to respond.</p> <p><i>Second bullet:</i> Is Qwest saying that it developed QPortal and/or QControl? If not, please identify the vendor/owner/manufacturer (all, if different). Is QControl the name that the new system will be known to Qwest CLEC customers? If not, is "MTG" the equivalent branding for CLEC customers as "QControl" for national customers?</p> <p><i>Third bullet:</i> Please promptly provide the student guide for QControl. Qwest refers to an improved CEMR/MEDIACC release, but Qwest has not yet demonstrated the replacement system will be an improvement. The preliminary timeline provided in the February CMP meeting (and revised in March) is inadequate. See Row 2(c), second bullet.</p> <p><i>Fourth bullet:</i> See comment/question re. first bullet.</p>

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<p>c. 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.</p>	<p>higher, or Firefox 3.5 or higher.</p> <ul style="list-style-type: none"> 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. 	<p><i>First bullet:</i> Although Qwest refers to QPortal as an "existing" system, QPortal is not the existing system used for CLEC repair purposes. The existing system is CEMR/MEDIACC. Qwest is using "existing" to mean a platform that Qwest is familiar with due to Qwest's use of the platform for other purposes. Qwest admitted on the March 16, 2011 that MTG is a new system, which Qwest happens to plan to place on its QPortal platform. Qwest refers to "BMG customers." What does BMG stand for? By indicating that such customers communicate repair information in an "app-to-app" environment," Qwest suggests that no customers communicate repair information via QPortal in a GUI environment (e.g., CEMR). Please indicate if QPortal is used to communicate information currently in a GUI environment. Although Qwest suggests here that QPortal works today, in response to 2(b) above (third bullet), Qwest admitted: "the functionality described in the QControl student guide only describes functionality in existence today, and does not yet include functionality for the replacement systems. Therefore, the QControl student guide would be an example of how the current system works, but would not represent any functionality for the . . . CEMR/MEDIACC release at this time." Qwest has no experience providing the functionality of CEMR/MEDIACC via QPortal at this time.</p> <p><i>Second bullet:</i> The preliminary timeline is inadequate. For CEMR (GUI) users, such as Integra, for example, Qwest's revised (March) timeline states that CLECs do not receive the draft release notes until November 15, 2011.</p>
<ul style="list-style-type: none"> 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 		

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	<p>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.</p>	<p>Only <i>one month</i> later (with the Thanksgiving holiday occurring during that month), on December 12, 2011, the "System . . . Available to CLECs" and Qwest is to "Begin Scheduling Migration Dates." One short month is too little time to review functionality, raise issues, receive responses, <i>etc.</i> To begin migration is basically to begin retirement/replacement, and Qwest's timeframes are not consistent with the merger settlement agreement. (See Row 2E.) Also, Qwest needs to promptly clarify why there are two deadlines on December 12, 2011. Is one (e.g., System Available to CLECs) for CEMR users and the other (e.g., Begin Scheduling Migration Dates) for MEDIACC users (or vice versa)? Integra does not agree to these deadlines and does not agree, for example, to use or migrate to the new system as of December 12, 2011 (or any other date inconsistent with the merger settlement agreements). Qwest needs to establish that it will fully meet its obligation to "use and offer" CEMR, with no loss of functionality or wholesale performance (see merger paragraphs 11 and 12), for the full time period required by the settlement agreements. Resources cannot be diverted to the detriment of CEMR because of Qwest's choice to implement a new system earlier. If Qwest is claiming that it is unable to meet its obligation for the full time period, then Qwest cannot rely on CMP only but also must deal with obtaining agreement and any needed approvals. See Section 4.</p>
<p>d. Has Qwest determined the Industry Standard or Specifications it will be using for the Network testing transactions? Per a February 2nd</p>	<p>Please see ATIS-0300002 XML Schema Interface for POTS Service Test.</p>	<p>Why is Qwest referring to a "POTS" test? Qwest considers UNEs to be "design" services, not POTS. Please provide the referenced document (or a URL for the referenced document).</p>

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<p>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.</p> <p>c. 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)?</p>	<p>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.</p>	<p>Qwest's response is incomplete. Qwest provides no explanation for its assertion that "the database used by MEDIACC can't run on newer hardware and operating systems." Why not? Has Qwest, as the developer, failed to maintain or update the database? What database(s) supports CEMR/MEDIACC? What does Qwest mean by "newer database"? Is data from the old system being placed/converted into the new system? If so, how? If not, how is historical information retrieved? Does the "newer database" include both Qwest and CenturyLink data? If Qwest can rewrite the application for its purpose, why can't Qwest rewrite the application for the current database? Qwest mentions only MEDIACC. What about CEMR? Please explain all reasons for the assertions in Qwest's response.</p>
<p>f. 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?</p>	<p>Qwest has no obligation to do so.</p>	<p>Integra disagrees. See also Row 1(f). Qwest cites nothing to support its position, despite repeated requests from Integra for Qwest to provide citations/support. CEMR and MEDIACC are legacy Qwest OSS. The Qwest-Integra merger settlement agreement (paragraph 12) requires Qwest to both use and offer legacy Qwest OSS for a two year period (thirty months per the Joint CLEC agreement). The 450-day period described by Qwest in Row 1(f) falls far short of this time period. Although Qwest</p>

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g. 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.	<p>mentions the possibility of another 12 months. Qwest does not guarantee it and, in any event, this is not the time period in approved agreements. (Even with a 12-month addition, Qwest falls short of the 30 months to which it recently committed.) Integra does not agree to a shorter time period, and Qwest may not unilaterally modify Commission-approved agreements. Qwest cannot retire them before the allotted time period, and after that period, Qwest must provide the detailed plan to the FCC, state commissions, and parties. There is no provision in the merger settlement agreements allowing Qwest to replace or integrate these legacy Qwest OSS without providing a detailed plan to the FCC and affected state commissions at least 270 days before replacing or integrating Qwest OSS per paragraph 12a of the merger settlement agreement. Even assuming Qwest were to negotiate and obtain approval of a shorter time period for CEMR/MEDIACC (which to date Qwest has not done), Qwest would still have to comply with merger paragraph 12(a) whenever it does replace or integrate these legacy Qwest OSS. Integra's request that Qwest indicate when it will provide the required detailed plan to the FCC and affected state commissions is ongoing.</p> <p>Qwest's short answer, with no details, provides no comfort that data integrity will be maintained. Qwest argued in the merger proceedings that CMP procedures alone were sufficient; CLECs opposed that position; and, to resolve this issue, Qwest agreed to the merger settlement terms, which require steps in addition to CMP compliance to replace or integrate any legacy Qwest OSS. Qwest is arguing its previous CMP-</p>

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		<p>only position while omitting any reference to the procedures in paragraph 12 and subparts of the Qwest-Integra merger settlement agreement. (See Rows 1(f) and 2(f) above.) The deal that was struck was that participating CLECs would have a say in the replacement or retirement of legacy Qwest OSS and that replacement/retirement would not proceed without that say, including a majority vote in CMP. The merger agreement procedures are supposed to help ensure that data integrity is maintained. See also Row 2(c).</p>
<p>h. 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?</p>	<p>CEMR/MEDIACC and the improved system will be running in parallel until the improved system has been validated.</p>	<p>Qwest refers to an "improved" system, but Qwest has not provided any support indicating the new system will be an improvement. Qwest also fails to define "validated." Qwest's contingency plan is limited solely to running CEMR/MEDIACC and the new system at the same time, though Qwest has not committed to doing so for the entire OSS time period identified in the merger settlement agreements. If that is incorrect, please provide the correct information.</p>
<p>i. 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.</p>	<ul style="list-style-type: none"> 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 	<p><i>First bullet:</i> Qwest is allowing itself the time it needs without accommodating CLECs' needs. A month is too short, for example. (See Row 2(c), second bullet.) Under Qwest's revised (March) timeframe, Qwest still plans to implement MTG less than two years (or 30 months) after the Closing Date, in December of 2011, and Qwest suggested in Row 1(f) that it intends to attempt to "migrate off" all users before the expiration of that time period (i.e., to in effect replace CEMR/MEDIACC early and without using the procedures of the Qwest-CenturyLink-Integra merger settlement agreement paragraph 12). This</p>

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	<p>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.</p> <ul style="list-style-type: none"> 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. <p>Acceptance of the new interface will occur according to existing CMP/software</p>	<p>is true even though CenturyLink's witness testified, for example: "Wholesale customers in CenturyLink areas and in Qwest areas, therefore, will not face immediate changes to their existing operations with the merged affiliates. CenturyLink and Qwest recognize that any future changes will require significant advance planning by wholesale customers, and CenturyLink pledges to give its CLEC customers ample and adequate notice of any future changes in compliance with all rules and terms of the interconnection agreements, applicable law and accepted business practices." (Mr. Flunsucker MN Surrebuttal, p. 4, lines 5-12.) The approved merger agreement is one such applicable law. Paragraph 12(c)(i) of the Qwest-Integra merger settlement agreement provides (with emphasis added) that the "replacement or retirement of a Qwest OSS Interface <i>may not occur</i> without sufficient acceptance <i>of the replacement interface</i> by CLECs to help assure that the replacement interface provides the level of wholesale service quality provided by Qwest prior to the Closing Date."</p> <p><i>Second bullet:</i> The preliminary timeline is inadequate. See comments regarding the previous bullet and Row 2(c), second bullet.</p>
j. At what point in time (e.g., at the time of retirement, or after two		Qwest does not answer the questions asked. Integra provided two scenarios, and Qwest did

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<p>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.</p>	<p>development processes. The preliminary timeline was provided in the February CMP meeting and is posted as part of this response to comments</p>	<p>not address either one. Qwest's silence indicates that, with respect to the "replacement interface" for CEMR/MEDIACC, Qwest never intends to perform the testing described in paragraph 12(c)(i) of the merger settlement agreement (see Rows 1(f), 2(f), and 2(i)). Please let us know if this is incorrect. If incorrect, please address the timing of the acceptance testing and specifically respond to the questions asked by Integra.</p>
<p>k. Please describe what training and education on MTG Qwest plans to provide and when Qwest will provide it.</p>	<p>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.</p>	<p>Qwest does not answer the question asked. Qwest lists potential options, but commits to none. The preliminary timeline is inadequate. (See Row 2(c), second bullet.) Qwest appears to have no current plan as to training and education on MTG, though it is required by merger agreement paragraph 12(c)(iii). Please let us know if that is an incorrect statement of Qwest's current plan. If incorrect, please describe the training and education and its timing.</p>
<p>l. 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 Embark's repair system (WebRSS) cannot be used after the billing integration and that CenturyLink's</p>	<ul style="list-style-type: none"> 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. 	<p><i>First bullet:</i> If Qwest's response is accurate, Qwest could and should have brought its Change Request ("CR") out of deferment earlier. If Qwest's response is accurate, Qwest was fully aware of the alleged CEMR/MEDIACC issues at the time it negotiated and signed the merger settlement agreement, but Qwest did not raise the issue, request any language to address the issue, or request any exception to paragraph 12 and subparts for repair (unlike the billing-specific</p>

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<p>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.</p>	<ul style="list-style-type: none"> 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. 	<p>language in paragraph 12d). Qwest waited until just after the settlement agreement was signed. Integra's settlement agreement was filed on Nov. 8, 2010, and Qwest re-introduced its CR on Nov. 10, 2010.</p> <p><i>Second bullet:</i> Integra has asked the same questions of both Qwest and CenturyLink, and Integra's questions to both companies are ongoing. If any information provided by Qwest differs if CenturyLink is answering the question, or after the merger closing, the company needs to promptly revise and update its responses, and its timeline, accordingly. By suggesting that Qwest is unfamiliar with CenturyLink repair, it appears that Qwest is admitting that it made its decision to replace CEMR/MEDIAACC without regard to whether CLECs would need to move and move again. Please let us know if that is incorrect. If the company's decision results in CLECs moving and moving again, the company should indicate whether it intends to compensate CLECs for the adverse consequences of the company's decision.</p>
<p>m. 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).</p>	<p>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.</p>	<p>The preliminary revised (March) timeline is inadequate. See Row 2(c), second bullet. As indicated in the previous Rows, there is information that Qwest should be in a position to provide at this time that Qwest has not provided. Qwest is allowing itself whatever time it needs to gather and provide information, while limiting the timeframes applicable to CLECs. Qwest's "full speed ahead" approach does not make sense, given that Qwest claims it does not yet even know needed information, and Qwest is not acting consistent with the merger settlement agreement terms. If Qwest wants to obtain</p>

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		flexibility as to those terms for CEMR/MEDIACC (due to alleged extenuating circumstances), then Qwest needs to work more collaboratively with CLECs and needs to fully address the questions identified in Section 4 below.
<p>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.</p>		
<p>INTEGRA 2/2/011</p> <p>a. 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.</p>	<p>QWEST 3/10/11</p> <p>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.</p>	<p>INTEGRA REPLY 3/18/11</p> <p>Qwest's two-sentence reply does not constitute the requested "detailed information." Qwest's response is in the past tense ("have derived"). If they have been derived, then Qwest should be able to provide them. As indicated in Row 2(b) (first bullet), Qwest should have been able to answer questions about functionality of the new system, based on functionality of the existing system, during the March 16, 2011 CMP meeting, but Qwest could not answer those questions</p>
<p>b. 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.</p>	<p>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.</p>	<p>Qwest refers to the new system as "improved," but Qwest has not demonstrated that the new system will be equal or improved. Qwest did not go over a revised presentation at the March 16, 2011 CMP meeting. On slide 7 of its posted March presentation, Qwest identifies functions that exist with CEMR and that Qwest indicates will exist with MTG, but Qwest calls the latter "improvements." Qwest does not explain how maintaining a functionality by imposing the time and expense of changing systems upon CLECs is an "improvement."</p>
<p>c. For each function listed in the</p>	<p>The requirements for the improved system have</p>	<p>CLEC is concerned about Qwest's statement that</p>

<p>INTEGRA 2/2/011</p> <p>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:</p> <ul style="list-style-type: none"> • Will MTG allow CLEC to view facility information? • Will the CLEC input the same information to obtain this data as it does today with CEMR? • Will the information that MTG provides for this function be the same data, presented in the same manner? • Will the response time be the same or better than the response time in CEMR? • Will MTG change existing field auto-population? • Will MTG change the availability of existing pull down menus? • Will MTG change existing query options? <p>d. Please provide the answers to questions 1-4 above as to all functions listed in the Qwest CEMR User Guide.</p>	<p>QWEST 3/10/11</p> <p>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.</p>	<p>INTEGRA REPLY 3/18/11</p> <p>the "look and feel" of MTG may be different from CEMR. CLEC does not agree to these difference(s). As the debate about functionality in the merger dockets show, CLECs and the Joint Applicants have different views as to functionality, and what Qwest and CenturyLink have said is the same functionality is not always in CLECs' view the same functionality. CLEC does not agree that the types of changes that Qwest is describing are "slight" variations.</p> <p>Qwest did not answer the questions posed by Integra. The answers to these specific questions are not in the February presentation (or the revised March version). Integra's requests for responses from Qwest and CenturyLink to each and every one of these questions is ongoing. Please respond.</p>
	<p>Please see response above.</p>	<p>Qwest did not answer the questions posed by Integra. The answers to these specific questions are not in the February presentation (or the revised March version). Integra's requests for</p>

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<p>e. Please describe access and level of access to the new system that will be available to CLEC.</p>	<p>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 presentation for that meeting, system design has just started and so that information has not been created at this time.</p>	<p>responses from Qwest and CenturyLink to each and every one of these questions is ongoing. Please respond.</p> <p>As indicated, Qwest's "full speed ahead" approach does not make sense in view of Qwest's claims that Qwest itself lacks needed information. Qwest has built insufficient time into its timeline for CLECs to review, respond to, and prepare for any changes. If CLECs point out differences in functionality, there is no time in the schedule for Qwest to add that functionality before implementation, etc.</p>
<p>4. <u>Relationship to Merger Agreement and Other Legal Issues.</u> We anticipate that Qwest legal will also respond separately regarding the legal/regulatory issues.</p>		
<p>INTEGRA 2/2/011</p> <p>a. 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.</p>	<p>QWEST 3/10/11</p> <p>This question is outside of the scope of CMP.</p>	<p>INTEGRA REPLY 3/18/11</p> <p>Integra has posed its questions not only in CMP but also to both Qwest and CenturyLink executives and Qwest and CenturyLink legal personnel. No one at Qwest or CenturyLink has answered them. Integra's requests are ongoing. The company has to address each OSS and wholesale quality paragraph of the merger settlement agreement and when and how the company will comply with each provision with respect to repair OSS (CEMR/MEDIACC/MTG). If Qwest believes any questions are outside the scope of CMP, then someone else at Qwest and CenturyLink as to answer them. Please respond.</p>
<p>b. 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</p>	<ul style="list-style-type: none"> 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 	<p><i>First bullet:</i> The preliminary timeline is inadequate. See Row 2(c), second bullet. Qwest needs to be forthcoming with more information and work in a more collaborative manner, if the proposed changes are to move forward, which</p>

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<p>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.</p>	<p>comments.</p> <ul style="list-style-type: none"> 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. <p>Questions regarding the merger agreements are outside of the scope of CMP.</p>	<p>they cannot do as proposed by Qwest, per the merger settlement agreements (see, e.g., Rows 1f and 2f above).</p> <p><i>Second bullet:</i> Integra has already forward specific questions, but as indicated in the other Rows in this column, Qwest has not answered them completely and in some cases not at all. The preliminary timeline is inadequate. Qwest cannot answer basic questions at this time, yet Qwest is unyielding as the short timeframes that it will then impose on CLECs. The preliminary timeline provides too little detail.</p>
<p>c. 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.</p>		<p>Integra has posed these questions not only in CMP but also to both Qwest and CenturyLink executives and Qwest and CenturyLink legal personnel. No one at Qwest or CenturyLink has answered them. Integra's requests are ongoing. If Qwest believes any questions are outside the scope of CMP, then someone else at Qwest and CenturyLink has to answer them. Please respond. Regarding the "additional 12 months" mentioned by Qwest in Row 2f (second bullet) and 5a (second bullet), please provide citations to any support for the 12 months referenced by Qwest. Where does the 12 months come from? Is Qwest unilaterally re-writing the timeframes in the merger settlement agreements after the fact? Does Qwest plan to comply with the provisions of merger paragraphs 12a and 12c after that additional 12 month period but before retiring or replacing CEMP/MEDIAACC? If Qwest is making a new offer, to modify the timeframes in the settlement agreements, please make this clear</p>

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and then Qwest needs to obtain CLEC agreement (which Qwest does not have at this time) and circle back to the regulators who approved those agreements. If Qwest and/or CenturyLink 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.

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a. Withdraw Qwest's CR to retire MEDIACC for at least 2 years.

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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.

First bullet: Qwest over-states Qwest's statements on the February CMP call. As reflected in the Qwest-prepared meeting minutes from that call, Qwest said it "may" place the MEDIACC CR in a Deferred status, and Qwest did not commit on the call to any time period for the length of the deferment. A deferment occurs when Qwest changes the status in the CR Detail on its website, and that did not occur until March.

Second bullet (except last sentence): Deferring the MEDIACC CR as described by Qwest is not fully documented and does not satisfy the terms of the Qwest-CenturyLink-CLEC merger settlement agreements. Qwest appears to be creating its own process and own timeline (potential "additional 12 months"), but Qwest is required to adhere to the processes outlined in the settlement agreements. If CLECs cannot rely upon the timeframes in the merger settlement agreements, how can CLECs rely on the 450-day or 12-month claim? (Regarding the "12 months," see Row 4c.) Additionally, does deferring the

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.

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		<p>MEDIACC CR until post-implementation of a new system (MTG) cause the timeline changes that Qwest describes in its second bullet point, even if Qwest defers rather than withdraws its CR? An electronic search of the CMP Document shows there is no reference to "450," so presumably Qwest selected and added together other timeframes, if Qwest is using the CMP Document. Please provide citations to the sections of the CMP Document supporting the 450-day time period and show how Qwest has calculated it. CLECs do not know at this time how Qwest may later claim a deferral affects the timeline. Specifically state how Qwest calculated the start of the 450-day period and whether it takes into account any activity to date (given that Qwest is deferring a CR and not initiating a new CR, as requested). When Qwest states that it will work with CLECs, does this include, for example, a majority vote of participants in CMP? It does not appear so, because Qwest refers to working with "each CLEC." Please address when a majority vote in CMP will occur before retirement/replacement of CEMR/MEDIACC. Paragraph 12(c)(i) of the approved Qwest-Integra merger settlement agreement provides (with emphasis added) that the "replacement or retirement of a Qwest OSS Interface <i>may not occur</i> without sufficient acceptance of the replacement interface by CLECs to help assure that the replacement interface provides the level of wholesale service quality provided by Qwest prior to the Closing Date." There is no exception such as if CLECs have migrated off of a particular system earlier. According to its statement in Row 2(l), Qwest has</p>

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	<p>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.</p> <ul style="list-style-type: none"> Once the improved system becomes available and is proven in testing with CLECS to provide full functionality, Qwest will measure PID/PAP performance based 	<p>been reviewing this issue since 2008, but Qwest requested and received no exception to paragraph 12 before Qwest executed the merger settlement agreement. Per Paragraph 12, Qwest must continue to use and offer, and can never retire or replace, CEMR and MEDIACC if Qwest does not comply with the commission-approved merger agreement procedures. Therefore, Qwest needs to answer Integra's repeated question as to the timing of when Qwest will take each step outlined in paragraph 12. Integra needs this information to plan for its own business needs.</p> <p><i>Second bullet (last sentence):</i> Qwest does not have the right it claims to be reserving. Qwest's commitments in the merger agreements include but also add to CMP requirements. There is a saying about seeking forgiveness rather than permission. That is not an acceptable approach here. These issues need to be dealt with in advance and not after the fact. In fact, CLECs believe they <i>have</i> been dealt with, via the merger settlement agreements, and Qwest still has not explained why it is acting as though that is not the case. (See Section 4.) Qwest also fails to explain how implementing a new, replacement system and migrating all CLECs to that system is anything other than retiring and replacing the old system, except as a matter of semantics to avoid certain obligations.</p> <p><i>Third bullet:</i> Qwest refers to an "improved" system, but Qwest has not yet demonstrated that the new system will be an improvement. Qwest refers to "testing." Qwest should perform parallel testing (old versus new) and compare the</p>

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	upon the new improved system.	two. That way, CLECs will not have to wait until it is too late to learn whether the system replacement adversely affects wholesale performance. Will the testing conform to the requirements of paragraph 12 and subparts of the Qwest-Integra merger settlement agreement, as well as any longer timeframes or additional requirements in other merger settlement agreements? What steps will Qwest take to ensure that use of a new system will not change how PID/PAD data is collected, calculated, etc.?
b. 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.	Integra disagrees, and its request for Qwest to withdraw this CR is ongoing. Replacing a legacy Qwest OSS is a significant step, and yet the following is Qwest's 12/16/08 Description of Change in its entirety (with emphasis added): "Implement new repair ticketing gateway to provide XML transactions <i>replacing ticketing functionality currently supported by MEDIACC</i> . Expected Deliverables/Proposed Implementation Date (if applicable): Late third quarter/fourth quarter 2009." Since then, Qwest added (with emphasis added): "New application will include limited testing <i>and also replace CEMR</i> ." As previously indicated, the replacement of CEMR/MEDIACC is an integral part of this CR, and the CR provides an insufficient description of the change. After Integra raised the issue of Qwest compliance with the merger settlement agreement, Qwest began to argue that it was separating the retirement of CEMR/MEDIACC from replacement with MTG. A minor wording change, after the fact (not until March 7, 2011), to the existing CR to delete the references to replacing MEDIACC is inadequate. It remains

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c. 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.	the case that Qwest intends to replace CEMR and MEDIACC with MTG, and Qwest's belated wording change does not change that reality.
		Integra disagrees, and its request for Qwest to withdraw this CR is ongoing. See previous Row. Qwest should wait until it is prepared to provide detailed information before it proceeds with submitting a new CR. Qwest also needs to address the questions in Section 4 before it may proceed.