

**EXHIBIT BJJ-44 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

From: New Cr, Cmp [mailto:cmpr2@qwest.com]

Sent: Friday, May 27, 2011 11:02 AM

To: Isaacs, Kimberly D.; 'cmpr@qwest.com'

Cc: 'Lynn.Notarianni@dora.state.co.us'; 'Barbara.Anders@dora.state.co.us'; 'mitch.moore@state.or.us'; 'julia.redman-carter@paetec.com'; 'Haas, William'; 'Hansen, Christopher (Chris)'; 'Eisenhart, Joan'; 'OBrien, Larry'; 'Lemke, Don'; 'Bilow, Joyce'; 'Johnson, Bonnie J.'; 'Brenda_Bloemke@cable.comcast.com'; 'jeanne.kulesa@synchronoss.com'; 'JNelson@popp.com'; 'Shelly.Pedersen@twtelecom.com'; 'Liz Tierney'; 'rgarth@libertybelltelecom.com'; 'mary_lohnes@mimi.net'; 'jeanne.kulesa@synchronoss.com'; 'Shelly.Pedersen@twtelecom.com'; 'jeff.sonnier@sprint.com'; Clauson, Karen L.; Strombotne, Tracy

Subject: RE: Integra's Questions: SYST:MEDI: Follow-up Response to Additional Comment Cycle
Maintenance Ticketing Gateway: Eff 12-12-11

In response to your question on the information to be posted to the website for the upcoming ad hoc meetings for MTG, that information has been posted to the calendar as of this morning. We encountered a delay in compiling the example transactions and necessary documentation and getting legal approval prior to sharing with the CLEC community. We apologize for the delay but this should still provide the CLECs with 8 calendar days to review and share with the appropriate technical folks prior to the call on 6/8/11.

Based upon feedback from the CLEC community as this project has been discussed, the CenturyLink technical team has been working behind the scenes to test various options that would further minimize the impact of this project on customers. As a result, the CEMR online interface was recently upgraded to a stable hardware and software platform that integrates well with current MEDIACC application, and will allow it to interface seamlessly to an MTG B2B application. Normally, CenturyLink would not disclose hardware upgrades that do not affect CLECs operationally, but in this situation and with this specific set of issues, CenturyLink is trying to communicate with the CLEC community in an open manner. CenturyLink will continue to work to make open communication a priority in the future.

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JC000329

From: Johnson, Bonnie J.

Sent: Wednesday, June 01, 2011 4:53 PM

To: 'New Cr, Cmp'; Isaacs, Kimberly D.; 'cmpcr@qwest.com'

Cc: 'Lynn.Notarianni@dora.state.co.us'; 'Barbara.Anders@dora.state.co.us'; 'mitch.moore@state.or.us'; 'julia.redman-carter@paetec.com'; 'Haas, William'; 'Hansen, Christopher (Chris)'; 'Eisenhart, Joan'; 'OBrien, Larry'; 'Lemke, Don'; 'Bilow, Joyce'; 'Brenda_Bloemke@cable.comcast.com'; 'jeanne.kulesa@synchronoss.com'; 'JNelson@popp.com'; 'Shelly.Pedersen@twtelecom.com'; 'Liz Tierney'; 'rgarth@libertybelltelecom.com'; 'mary_lohnes@mimi.net'; 'jeanne.kulesa@synchronoss.com'; 'Shelly.Pedersen@twtelecom.com'; 'jeff.sonnier@sprint.com'; Clauson, Karen L.; Strombotne, Tracy; 'Michael E Mccarthy (Michael.Mccarthy@state.mn.us)'; Johnson, Bonnie J.; Denney, Douglas K.

Subject: Integra's Questions: SYST:MEDI: Follow-up Response to Additional Comment Cycle Maintenance Ticketing Gateway: Eff 12-12-11

Mark,

Your email below raises more questions than it answers. We remain concerned that Qwest is going ahead with its repair system project despite CLEC objections and despite the merger conditions and merger Orders. Your reference to "further minimize[ing] the impact of this project on customers" heightens our concerns. While at least Qwest finally recognizes that this project is impacting the Company's customers, your statement suggests that it is sufficient to "minimize" the impact, suggesting some impact is ok. It is not ok. If the Company were complying with the merger conditions and Orders, there would be no project and no impact or potential impact to customers, retail or wholesale. Our objections, and our request that you cease such activity and withdraw the pending CR relating to CEMR/MEDIACC/MTG, are ongoing.

We object to Qwest making changes "behind the scenes" without advance notice and opportunity to comment for CLECs. Whereas CenturyLink may have had a policy of not disclosing hardware or other upgrades that it unilaterally determines do not affect CLECs operationally, Qwest Corporation and thus the Merged Company in legacy Qwest territory has an obligation to follow CMP and ICA procedures for changes, including back-end changes, that may affect customers, whether the changes ultimately operationally affect CLECs or not. While you may not expect an adverse impact, things happen. If an unexpected adverse impact occurs, the CLEC is left with an outage or other problem and no explanation or ability to prepare for it. Also, in this case, there is the added issue of whether the Company should be making the changes at all, given the merger conditions and Orders. As we have stated before, it is insufficient to seek forgiveness rather than permission. Although you refer to "open communication," it is not open communication to deliver minimal information after-the-fact, when disclosure and discussion before-the-fact is required.

We ask that Qwest/CenturyLink promptly and expressly address not only our pending questions (in the matrix and in the email below, etc.), but also the following questions raised by your email below:

- Please fully describe the changes (which you refer to below as "upgraded" and "upgrades") that were made, including and to what systems/software/hardware, and when they were made (e.g., when is "recently"?).

- For those changes/"upgrades," were there at any time any outages and, if so, was there advance notice with reason for the change/cause given? If there were outages, please describe them, including dates, times, length of outages. If there were no outages or downtime, how did you perform hardware upgrades with no downtime?
- Are any applications/software, including in the back-end, on different hardware now? If so, please describe.
- Qwest has claimed that the reason for its Change Request to implement MTG was the alleged instability of the existing system. CLECS requested verification of that claim and to date have not received sufficient verifying information to persuade us that this was the case. Qwest admitted in CMP that there were fewer outages last year than there have been in any other year since 2003. Per your email below, you state that the existing system "was recently upgraded to a stable hardware and software platform." Now that the only reason provided by the Company for replacing or integrating CEMR/MEDIACC (alleged instability) has been addressed, is the Company going to withdraw its pending CR to implement MTG? If not, why not? If the existing system is stable at this time, why do you desire to replace or integrate it before the end of the merger moratorium period?
- Why did the Company make these changes now? Why did the Company choose to not take these steps to make the existing system more stable before? Why did the Company wait until recently to make these "upgrades," when if there was an instability problem, the Company had these means available to make them stable?
- On February 2, 2011, Integra asked: "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)?" Please review Row 2(e) of the Matrix, including Qwest's response to this question and Integra's reply. Why were hardware upgrades doable recently but not earlier? Qwest said on 3/10/11 that "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." Did the Company re-write the application to utilize a newer database? If not, was the information Qwest provided on 3/10/11 inaccurate? If the Company did re-write the application to use a newer database, please describe the newer database. Also, please address how doing so in this manner could be consistent with the CMP Document and/or the merger conditions and Orders. What is the newer database, and does it or will it contain any integrated information? Does the re-write of the application or the database have any relationship to any billing system?
- Does any aspect of the recent "upgrades" or "MTG B2B application" have any relationship to a billing integration?
- Qwest did not respond to the following from our email below – Please respond:
 - “Also, before the merger, Qwest had directed certain questions to CenturyLink. Now that the merger is completed, we anticipate that you will respond in CMP,

perhaps when you respond to the remainder of the matrix, if not earlier; for example:

- Matrix, Row 2(l): '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.'
- Does the Company's push to implement and integrate MTG have any relationship, direct or indirect, to the Company's merger-related activities or plans to use MTG for the merged company going forward?
- Please identify any integration of systems or data or other integration that has taken place. For example, you state below that the recent upgrades "will allow it to interface seamlessly to an MTG B2B application." We believe that this can more accurately be described as an integration of it and MTG – even though the merger conditions do not allow integration during this time period. If that is incorrect, please explain why.
- Is Qwest going to proceed with moving itself or any carrier(s) to MTG, or any other integration with MTG, before the end of the merger's 30-month moratorium time period? If so, has notice been provided to regulators and, if not, when will it be provided?

So that participants have access to the information, I have enclosed a courtesy copy of the recent joint filing of Integra, PAETEC, and tw in Colorado regarding CEMR/MEDIACC/MTG. The Company's response is due in Colorado in 20 days. Please review the enclosed. We continue to request that the Company comply with the merger conditions and Orders, including with respect to how and when the Company proceeds in CMP.

Some of these questions have been pending since at least February or March. Please commit to a date by which Qwest will respond. This date may affect meeting schedules or topics at meetings, if the information is provided insufficiently in advance.

Bonnie

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