

**EXHIBIT BJJ-50 TO THE  
DIRECT TESTIMONY OF  
BONNIE J. JOHNSON  
ON BEHALF OF  
INTEGRA TELECOM**

**From:** Clauson, Karen L.

**Sent:** Tuesday, June 14, 2011 4:41 PM

**To:** 'Hunsucker, Mike R'; 'Nodland, Jeff'; 'Gardner, Linda K'; 'Hammack, Carolyn'; 'New Cr, Cmp'; 'Tim.Goodwin@qwest.com'; 'Topp, Jason'; Interconnection Agreements

**Cc:** Oxley, J. Jeffery; Johnson, Bonnie J.; Denney, Douglas K.; Isaacs, Kimberly D.

**Subject:** RE: CEMR/MEDIACC and MTG

Enclosed is Qwest's "revised" OSS timeline, which Qwest just distributed via CMP email and posting to the web calendar, after we inquired today as to why Qwest had missed the CMP deadline for distributing these materials. Integra continues to object to your plan. In some respects, the revised timeline increases Integra's concerns about Qwest's and CenturyLink's plans and their lack of regard for the merger commitments and orders.

Qwest continues to push full speed ahead with its plans to implement and integrate MTG by the end of this year, as shown in Columns A and B of the enclosed timeline. Per Columns D and E, only long after those steps have been completed will Qwest even begin the merger steps, commencing with notice to the FCC/PUC, that the merger agreement contemplates will happen first. As indicated in Integra's May 19 email below, however, per FCC merger commitment (paragraph IV(A)(2)), Qwest is supposed to file its "proposed transition plan" with the regulators, not submit a fait accompli.

Qwest's argument that this is "optional" for CLECs is transparent, and it does not bring the Company into compliance with its merger commitments. Qwest may argue that it is still "offering" CEMR/MEDIACC to CLECs, but the merger agreements require the Merged Company to both "use and offer" legacy Qwest OSS. This provision is not limited to CLEC use of legacy Qwest OSS. The merger agreements require that the merger steps be followed not only before a Qwest system is replaced, but also before a Qwest system is "integrated." The detailed plan has to be filed with the FCC and Commissioners, and the other steps taken, before the Merged Company in any way integrates Qwest systems. Qwest appears to be choosing to read this as integrated for or with CLECs, but that is not the case. If any aspect of Qwest system/data is being integrated (e.g., Embarq and Qwest or other internal integration or integration for non-CLEC use), the company cannot proceed for 30 months, and it must follow the merger steps, including a third party facilitator (which is not mentioned in your revised timeline).

As indicated in the Joint CLEC Colorado and Minnesota filings, by implementing MTG for itself first, Qwest/CenturyLink decreases incentive to maintain the existing repair OSS. Also, although Qwest is claiming that this is "optional" for CLECs now, once Qwest has implemented MTG for itself or its own purposes, it will be more difficult, if not impossible, to obtain changes. If a CLEC does not expend resources now to review the draft specifications, etc., it risks Qwest later arguing that the specs were available and the CLEC chose not to review them. The Company's approach may force CLEC(s) to go through the review process now, even if they plan to implement later, to try to prevent development that cannot be corrected. If they don't "choose" to implement now (which is not a real choice), then they won't be able to test the functionality and transactions in a manner allows up-front input, even though up-front input was intended by the merger agreement. The merger condition was supposed to protect CLECs from such resource expenditures for at least 30 months.

On May 2, 2011, you indicated that "CenturyLink continues to have concerns that a catastrophic failure could result with MEDIACC and CEMR." On May 18, 2011, Qwest said in CMP that it had a "burning need" to get the new system in place. Since then, on May 27, 2011, Qwest declared in a CMP email that

the existing repair OSS is now "stable." Assuming there ever was an instability issue, now that Qwest has declared the system stable, the burning need should have died out. There is no stability reason not to wait for the 30-month time period to which you only recently committed. In our May 4, 2011 meeting here, you indicated that CenturyLink has decided to move all of the company to the new system, MTG, and assured that therefore CLECs would not have to move to MTG and then move again. CLECs do not need to move at this time at all. Therefore, the remaining reason for the move is that the Merged Company is proceeding with its own merger-related integration plans. The company, however, agreed that it would not do so for OSS (including billing OSS if CLECs are affected) for at least 30 months.

If the Company nonetheless proceeds, the Company is, at a minimum, waiving any later claims that changes cannot be made because it will be too expensive for the Company to make changes, that CLECs should have reviewed the specs earlier, etc. , in addition to being in violation of the agreement.

Our objections, and our requests for answers to our previous questions, are ongoing.

Karen