

**EXHIBIT BJJ-51 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

From: Johnson, Bonnie J.
Sent: Tuesday, June 14, 2011 5:54 PM
To: Johnson, Bonnie J.; '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)'; 'Greg Darnell'; Denney, Douglas K.; 'Pruitt, Bill H'
Subject: Integra's Questions: SYST:MEDI: Follow-up Response to Additional Comment Cycle
Maintenance Ticketing Gateway: Eff 12-12-11

Mark and Susan,

Although we just received the revised timeline today so have not had sufficient time to review, we have put together a few preliminary questions that we ask that you address on tomorrow's call. They are enclosed.

Thanks,
Bonnie

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PRELIMINARY QUESTIONS ABOUT QWEST JUNE 14, 2011 REVISED TIMELINE¹

Please define “internal” and “external,” and please explain what is the difference.

What is the purpose of “internal” tasks and of “external” tasks?

Who does “internal” refer to? Qwest Corporation? And/or other CenturyLink entities?

Any other carrier/company?

There is an “internal” date of 5/2/2011 for “Begin Deployment” and “Begin Migration Planning” but you will not “begin working on draft tech specs” until July 5, 2011. How does the company begin deployment and migration planning without even draft specs to guide deployment and migration planning? Is there anything else being deployed or migrated? What do deployment and migration planning involve, with no tech specs?

There is an “internal” date of 12/10/2011 for “Begin Deployment Process.” What is being deployed and for whom? For example, assume no CLECs request the so-called “optional” testing/implementation. In that scenario, which carriers/entities will “begin deployment” on or after December 10, 2011, but before October 2, 2012?

How can the specifications on September 2, 2011 be “final” but the specifications ten months later, on July 2, 2012, be “draft”? Please explain how Qwest views this will work. What makes the later specs only “draft”? Won’t much of it already be implemented?

If, after December 12, 2011, changes are required to the replacement interface (MTG) to help assure that the replacement interface provides the level of wholesale service quality provided before the transaction closing date, what process will Qwest require for those changes? Will Qwest require CLECs to submit a change request? Will Qwest bear the cost of these changes?

There is a “Retire Mediacc” external date of 10/7/2013 for “external” tasks, but no “retire Mediacc” task for the “internal” timeline. When is Mediacc replaced by MTG in part or entirely for “internal” users?

Please explain why the timeframes are so compressed and how the company envisions working collaboratively or taking into account any CLEC input under such short timeframes. Even in 2012, under the “external” tasks, there is only a couple of days between the “walk through” and “comments due,” leaving almost no time to absorb the walk through and comment. Then, there are only four days, until July 24, 2012, before the final tech specs are issued. A time period of four days does not suggest any plan on the Company’s part to thoughtfully review, take into account, and possibly adjust its plans before final specs are issued. What is the purpose of commenting, however, if the Company has no plan to take the comments into account?

¹ Integra has objected to Qwest proceeding with its pending CR and requested compliance with the merger agreements and orders. Nothing in this document or in Integra’s participation in CMP waives those objections. By proceeding over CLEC objection, Qwest has placed CLECs in a position of having to expend resources monitoring and commenting on Qwest’s activity, even though Qwest should not be proceeding in this manner.

The companies are supposed to work together to develop acceptance criteria for the replacement interface (MTG). We do not find this in the revised timeline. Is this step going to be part of the internal and/or external tasks? When will it occur?

The revised timeline does not account for all of the merger steps. For example, please address the steps in the Joint CLEC agreement, on pages 2-4 of the enclosed document), such as aggregate transaction data, third party facilitator, *etc.*, and when each will occur (on the internal and/or external steps).

From: Redman-Carter, Julia [mailto:Julia.Redman-Carter@PAETEC.com]

Sent: Tuesday, June 14, 2011 5:57 PM

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CMP,

The information that Qwest has provided thus far regarding the replacement MTG is not sufficient for PAETEC to evaluate the impact on our OSS (back-office, processes and resources). Consequently, PAETEC is reserving responses, objections, concerns, approvals, etc., and, to the extent PAETEC participates, its participation does not indicate acceptance or agreement. Qwest/CenturyLink needs to comply with the merger conditions. Also, we need to 1) receive adequate and complete details of the proposed MTG specs, 2) be provided sufficient time to review the specs and identify the impacts on PAETEC's OSS, and 3) be provided time to review the modified specs after Qwest has made any changes/modifications required necessary per our feedback and collaborative efforts. Even setting aside the merger condition issues, the revised timeline is too compressed.

PAETEC has the same questions Integra has submitted (below). Please include PAETEC on the responses.

Thank you,
Julia Redman-Carter



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