

**EXHIBIT BJJ-65 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**



August 10, 2011

Bonnie Johnson
Oregon Telecom Inc
730 2nd Ave. South Suite 900
Minneapolis, MN 55402
bjjohnson@integratelecom.com

TO: Bonnie Johnson

Announcement Date: August 10, 2011
Effective Date: Immediately
Notification Number: CMPR.MEET.08.10.11.F.09384.MTG_Addl_WalkthruOpprtnty
Notification Category: Change Management Notification
Target Audience: CLECs, Resellers
Subject: CMP - Maintenance Ticketing Gateway (MTG) additional Walkthrough Opportunity of Draft Tech Specs
Associated CR # or System Name and Number: CenturyLink CR # SCR121608-02

Description of the Issue and Reason for Calling an Ad Hoc Meeting

Pursuant to Section 3.0 of the CenturyLink Wholesale Change Management Process document available at <http://www.centurylink.com/wholesale/cmp/index.html>, the purpose of this notification is to alert customers of an additional Walkthrough opportunity for the CLEC community to ask questions about the technical information associated with Maintenance Ticketing Gateway (MTG) that was shared with the draft technical specifications that were posted on August 5, 2011 via notification

SYST.MEDI.08.05.11.F.09382.MTG1.0_Drft_Tech_Specs . In this meeting, CenturyLink technical staff will be available to answer technical questions on the planned MTG application to application system. This review is in advance of the formal technical walkthrough that is scheduled for August 24, 2011. For additional information about the August 24 meeting refer to the wholesale calendar at <http://wholesalecalendar.centurylinkapps.com/>.

CenturyLink encourages customers to invite their technical staff to this meeting to review the technical material provided and to ask questions about the information.

Logistics for the Monthly CMP Meeting:

NOTE: The MTG discussion will follow the normal CMP monthly meeting.

- **Date:** Wednesday, August 17, 2011
- **Time:** 9:00 a.m. to 11:00 a.m. MDT
- **Conference Bridge:** 1 866-789-8819 Conference ID 6273158#

To allow call participants to plan their time based on the topics covered, CenturyLink technical SMEs will conduct the MTG discussion following the end of the normal CMP monthly meeting agenda for both Product Process and Systems.

Supporting Material:

The MTG draft technical specifications associated with the system release notice

SYST.MEDI.08.05.11.F.09382.MTG1.0_Drft_Tech_Specs are posted at

<http://www.centurylink.com/wholesale/cmp/review.html>. They are also available on the

Wholesale calendar at <http://wholesalecalendar.apps.com/> for August 24, 2011.

Change Request SCR121608-02 is contained in the System Interactive Report posted to the CenturyLink Web site at <http://www.centurylink.com/wholesale/cmp/changerequest.html>

If you have any questions or comments about this notification, please contact Susan Lorence, CenturyLink CMP Project Manager, at Susan.Lorence@centurylink.com.

Sincerely,

Qwest Corporation dbaCenturyLink QC

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 Corporation dbaCenturyLink QC and the CLEC party to such interconnection agreement.

The CenturyLink Wholesale Web Site provides a comprehensive catalog of detailed information on CenturyLink products and services including specific descriptions on doing business with CenturyLink. 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.

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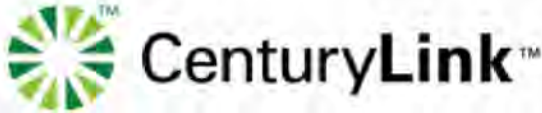
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<http://www.centurylink.com/wholesale/notices/cnla/maillist.html>

cc: Stephanie Smith

Maryann Wiborg OR Rita Urevig

CenturyLink Inc. – 930 15th Street 7th Floor, Denver CO 80202



August 26, 2011

Bonnie Johnson
Advanced Telcom Inc.
730 2nd Avenue South - Suite 900
Minneapolis, MN 55402
bjjohnson@integratelecom.com

TO: Bonnie Johnson

Announcement Date:	August 26, 2011
Effective Date:	December 12, 2011
Notification Number:	SYST.MEDI.08.26.11.F.09440.MTG1.0_DrftTechSpecsCORR
Notification Category:	Systems Notification
Target Audience:	CLECs, Resellers, IXC, Wireless
Subject:	CMP - Maintenance Ticketing Gateway (MTG) 1.0 - Draft Technical Specifications - CORRECTION
Associated CR # or System Name and Number:	MTG Release 1.0 CenturyLink CR# SCR121608-02

NOTE: CenturyLink is providing a correction to the date CLEC comments are due on the MTG Draft Technical Specifications. Per the CMP document, the date for CLEC response to comments should have been identified as August 30, 2011 vs. the August 26, 2011 date that was originally identified in System Notification SYST.MEDI.08.05.11.F.09382.MTG1.0_Drft_Tech_Specs. The Timeline below has been updated for the CLEC response to comments date to match the OSS Release Calendar Version 119 which is available at <http://www.centurylink.com/wholesale/cmp/teammeetings.html>. All other information in the content of the August 5, 2011 notice is correct as included below.

On August 5, 2011, CenturyLink will post planned updates to its Draft Technical Specifications for Maintenance Ticketing Gateway (MTG) 1.0 targeted for implementation on December 12, 2011. These will be posted to the CenturyLink Wholesale Document Review site at <http://www.centurylink.com/wholesale/cmp/review.html>.

Summary of Change:

The summary of changes is included in the Draft Technical Specifications.

Comment Cycle:

CenturyLink encourages you to review the planned application changes and submit questions or comments at any time during the comment cycle as listed in the table below.

To submit questions or comments on these changes, go to the CenturyLink Wholesale CMP Comment Process page at <http://www.centurylink.com/wholesale/cmp/comment.html> and fill in all fields or you may submit comments by email to cmpcomm@centurylink.com. Be sure to reference the notification number listed above.

This document will remain on the CenturyLink Wholesale Document Review site until the end of the comment cycle and will then be moved to the CenturyLink Wholesale Document Archive at http://www.centurylink.com/wholesale/cmp/review_archivesystem.html.

Timeline:

Draft Technical Specifications		Available August 5, 2011
CLEC Comment Cycle begins	Details for providing comments are provided above.	August 5, 2011
CenturyLink/CLEC Walk-through	Review meeting to provide an informational overview and answer CLEC questions on the Draft Technical Specifications. All relevant CenturyLink SMEs will be in attendance and CLEC SMEs are encouraged to participate.	August 24, 2011 1:00 - 3:00 p.m. MT BY TELECONFERENCE ONLY: 1-866-789-8818 Participant Passcode: 666413# If no participants have joined the bridge 10 minutes after the meeting start time, the bridge will be closed.
CLEC Comment Cycle ends		August 30, 2011 5:00 p.m. MT
Final Technical Specifications Issued	Includes response to CLEC comments, if applicable.	September 2, 2011
Testing Window Begins	Testing Available	November 5, 2011
Targeted Production Date		December 12, 2011

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

Sincerely,

Qwest Corporation dbaCenturyLink QC

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<http://www.centurylink.com/wholesale/notices/cnla/maillist.html>

cc: Stephanie Smith

Rita Urevig

CenturyLink Inc. – 930 15th Street 7th Floor, Denver CO 80202

From: Johnson, Bonnie J.
Sent: Tuesday, August 30, 2011 2:53 PM
To: Johnson, Bonnie J.
Subject: SYST MEDI 08 05 11 F 09382 MTG_Drft_Tech_Specs

Thank you for submitting your comments through the CenturyLink™ CMP Document Review and Comment Process.

The information you entered is listed below.

If you have any questions, please direct them to cmpcomm@centurylink.com.

This communication was sent with <http://www.centurylinkapps.com/wholesale/cmp/comment.cfm>.

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Notification Number: SYST MEDI 08 05 11 F 09382 MTG_Drft_Tech_Specs

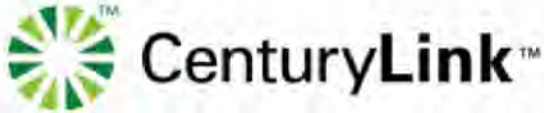
Comment:

Qwest has continued, over CLEC objection, toward implementing MTG, including reviewing draft technical specifications at a time when this activity should not be occurring under the merger settlement agreements and orders. Qwest's conduct is in violation of the merger settlement agreements and orders, and CenturyLink has provided insufficient information. Any participation by Integra has been to monitor this activity, over CLEC objection, and does not waive any Integra right. Integra has expressed objections and comments on Qwest's approach and process, including the draft technical specifications, and those objections are ongoing. Integra incorporates its comments and objections by reference here.

=====

Name: Bonnie Johnson
Title: Director Carrier Relations
Phone Number: 763 745-8464
E-mail Address: bjjohnson@integratelecom.com

Date/Time Submitted: 8/30/11 12:52:53PM



September 2, 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:	September 2, 2011
Effective Date:	October 17, 2011
Notification Number:	SYST.IMAS.09.02.11.F.09449.IMAXML31.0FinalTechSpecs
Notification Category:	Systems Notification
Target Audience:	CLECs, Resellers
Subject:	CMP - Systems Document In Review IMA XML Release 31.0 - Final Technical Specifications
Associated CR # or System Name and Number:	IMA Release 31.0

On September 2, 2011, CenturyLink will post planned updates to its Final Technical Specifications for IMA XML Disclosure Documentation for IMA 31.0 targeted for implementation on October 17, 2011. These will be posted to the CenturyLink Wholesale Document Review site, http://www.centurylink.com/wholesale/cmp/review_archivesystem.html.

Summary of Change:

The summary of changes is included in the Final Technical Specifications.

For IMA XML 31.0, CenturyLink is publishing two (2) versions of each of the Developer worksheets (Appendices A-D): a.) a Microsoft Word version and b.) an Adobe Portable Document Format (.pdf) version. Both versions contain identical information. Both highlight changes from IMA XML 30.0 to IMA XML 31.0 in colored font (additions/changes show as colored font; deletions show as colored strikethrough).

NOTE: Customers should note that minor formatting changes (font size, etc.) made for consistency will "track" as a change, but will not show up in a different font. To determine the kind of change, customers

may place their cursor over the tracked change in Microsoft Word to see a "balloon" that provides a summary of the change.

IMA XML Test Environment:

The IMA XML Test Environment, SATE, will be available on September 17, 2011. If you are interested in using this environment for testing, please contact Carrie Bousfield at Carrie.Bousfield@CenturyLink.com.

Walkthrough: Agenda, Attachments and Minutes:

On August 15, 2011, CenturyLink conducted its CLEC Combined Candidate and IMA XML 31.0 Disclosure Documentation Walkthrough session (announced as part of notification number SYST.IMAS.08.05.11.F.09327.IMAXML_31.0DrftTechSpecs). CenturyLink has posted the release overview and meeting minutes from the Walkthrough session on the Wholesale Calendar at the following URL: <http://wholesalecalendar.CenturyLinkapps.com/>.

Comment Response:

The response has been posted to the Document Review web site under the Notification Number SYST.IMAS.08.05.11.F.09327.IMAXML_31.0DrftTechSpecs. This response is listed within the Systems Documents section. The URL is http://www.centurylink.com/wholesale/cmp/review_archivesystem.html.

Timeline:

Final Technical Specifications available	Includes CenturyLink response to comments	September 2, 2011
CLEC Testing Window Begins	IMA XML SATE available for test	September 17, 2011
Targeted Production Date		October 17, 2011

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

Sincerely,

Qwest Corporation dbaCenturyLink QC

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<http://www.centurylink.com/wholesale/notices/cnla/maillist.html>

cc: Judy Rixe
Kevin Kidd
Maryann Wiborg OR Rita Urevig

CenturyLink Inc. – 930 15th Street 7th Floor, Denver CO 80202

CenturyLink Response to Document in Review

Comment Response Date: September 2, 2011
Document Subject: Maintenance Ticketing Gateway (MTG) Release 1.0
Initial Notification Date: August 5, 2011
Initial Notification Number: SYST MEDI 08 05 11 F 09382 MTG_Drft_Tech_Specs
Category of Change: System

CenturyLink recently posted proposed updates to **MTG RELEASE 1.0 Draft Technical Specifications**. CLECs were invited to provide comments to these proposed changes during a Document Review period from **August 5, 2011** through **August 30, 2011**. The information listed below is CenturyLink's Response to CLEC comments provided after the CLEC Candidate Overview held on August 24, 2011.

Resources:

Customer Notice Archive <http://www.CenturyLink.com/wholesale/notices/cnla/>
 Document Review Site <http://www.CenturyLink.com/wholesale/cmp/review.html>

If you have any questions on this subject or there are further details required, please contact CenturyLink's Change Management Manager at itcomm@CenturyLink.com.

CenturyLink's Response to MTG Interface Specification_082411.doc

#	CLEC Comment	CenturyLink Response
1.	<p>PAETEC August 19, 2011</p> <p>As noted in previously in several forums including CMP, if MTG is a back-up for MEDIACC, then PAETEC finds that MTG needs to be able to support a CMIP interface in addition to the XML interface. Qwest MEDIACC and PAETEC EBTA systems currently interface (a critical functionality) using CMIP.</p>	<p>CenturyLink is currently evaluating this CMIP proposal, which will take some time. The proposal is being considered by our internal IT department, and is also being reviewed with our outside vendor. Both processes will evaluate the technical and financial feasibility of this proposal. CenturyLink is analyzing this proposal as quickly as possible and will provide a response through the CMP process as soon as the response is ready.</p>
2	<p>PAETEC August 19, 2011</p> <p>Also, PAETEC would like to suggest that the RetrieveAttributesByTroubleReportIdReq uest be enhanced to support the following additional items:</p>	<p>These elements are included in the XSD provided in the Technical Specifications, and will be retrievable if present on the ticket. The XML example provided in the specification depicts an open ticket, and therefore does not include the additional items requested, as those pertain to a</p>

<p>tML-TABase:CloseOutNarr tML-TABase:MaintServiceCharge tML-TABase:OutageDuration tML-TABase:RestoredTime tML-TABase:TroubleFound</p> <p>In scenarios where we late bond a ticket, it is possible that the ticket is already in a cleared status. PAETEC needs this information to properly resolve our internal ticket. This would eliminate the need for our techs to reach out via phone to determine resolution information. Though this is not existing functionality, it's an improvement that would increase efficiency on both sides.</p>	<p>closed ticket.</p> <p>NOTE: MEDIACC does not allow closed tickets to be retrieved. However, we can allow this in the introduction of MTG.</p> <p>CenturyLink will be providing this information in the MTG 1.0 initial implementation.</p>
<p>3. PAETEC August 25, 2011</p> <p>Upon review of the MTG Draft Interface Spec (dated 8-24-2011), Don Lemke (PAETEC Software Engineer) found a typo, which makes the Request WSDL not valid as listed in the doc. Please see below for detail.</p> <p>In section 2.4.1, the Request WSDL as listed is not valid. It's missing something like the following at the beginning of the WSDL text:</p> <pre><?xml version='1.0' encoding='UTF-8'?> <definitions name="ReportServiceDefinitions" targetNamespace="http://qwest.com/qxg" xmlns:apachesoap="http://xml.apache.org/xml-soap" xmlns:tns="http://qwest.com/qxg" xmlns:soapenc="http://schemas.xmlsoap.org/soap/encoding/" xmlns="http://schemas.xmlsoap.org/wsd/" xmlns:soap="http://schemas.xmlsoap.org/wsd/soap/" xmlns:xsd="http://www.w3.org/2001/XMLSchema"></pre>	<p>Thank you for your comment regarding Section 2.4.1 "Request WSDL" of the <i>Maintenance Ticketing Gateway DRAFT Interface Specification</i>, version 2, dated August 24, 2011.</p> <p>In section 2.4.1, the Request WSDL, as published, is missing the following six lines at the beginning. When CenturyLink publishes the next version of the document, we will insert these six lines:</p> <pre><?xml version='1.0' encoding='UTF-8'?> <definitions name="QxgTmServiceDefinitions" targetNamespace="http://qwest.com/qxg" xmlns:apachesoap="http://xml.apache.org/xml-soap" xmlns:tns="http://qwest.com/qxg" xmlns:soapenc="http://schemas.xmlsoap.org/soap/encoding/" xmlns="http://schemas.xmlsoap.org/wsd/" xmlns:soap="http://schemas.xmlsoap.org/wsd/soap/" xmlns:xsd="http://www.w3.org/2001/XMLSchema"> <types></pre>

	<p><types> ...the rest of the request WSDL here ...</p> <p>The WSDL as listed is not valid and doesn't generate the java code. If I add the block listed above, then I can get the Request WSDL to validate and generate the java code fine. Note, I copied the block above from the Response WSDL, which is valid and does generate the java code just fine. I'm not sure if it should be "ReportServiceDefinitions" or "RequestServiceDefinitions". Either way, I hate to guess at things, so that is why I bring it to your attention for them to fix.</p>	
4.	<p>Integra August 30, 2011 Qwest has continued, over CLEC objection, toward implementing MTG, including reviewing draft technical specifications at a time when this activity should not be occurring under the merger settlement agreements and orders. Qwest's conduct is in violation of the merger settlement agreements and orders, and CenturyLink has provided insufficient information. Any participation by Integra has been to monitor this activity, over CLEC objection, and does not waive any Integra right. Integra has expressed objections and comments on Qwest's approach and process, including the draft technical specifications, and those objections are ongoing. Integra incorporates its comments and objections by reference here.</p>	Integra's objections are noted.
5.	<p>XO Communications, Inc. August 30, 2011 We've received the notifications regarding the new MTG system for Electronic Trouble Tickets that will deploy to prod on 12/12/11.</p> <p>Will the current Ebonded Trouble Ticket system that we have in place today with "former Qwest" remain in production or is this a production hot cut to the new MTG and has to be cut over before the Monday 12/12/11</p>	The introduction of MTG in December 2011 will not replace MEDIACC or any other system at that time. MEDIACC will remain in place until 2013. MTG is being offered as an option for CLECs should they voluntarily choose to interface with it prior to 2013. Qwest/CenturyLink will continue to use and offer MEDIACC to CLECs until 2013 and will follow the notification process as required by CMP to retire MEDIACC.

	date?	
6.	<p>PAETEC August 30, 2011 PAETEC reasserts our proposal regarding CMIP Interface and MTG contained in the email to CMP, Subject: "RE: Please address MN PUC Vote and PAETEC Option - Repair OSS," sent August 16, 2011 ("CMIP Email"). I have attached the CMIP Email.</p> <p>Based on the documentation CenturyLink has provided thus far, which is still in development, incomplete and does not include the MTG Implementation Document, PAETEC's interim review of the XSD documents (which are the TML Industry Standards on page 24 of the MTG document reviewed on August 24, 2011) appear to include many attributes and transactions the Legacy Qwest system currently supports today. Though CenturyLink has not responded to the PAETEC's proposal regarding CMIP Interface, it appears that some of our other recommendations will be incorporated in MTG based on the XSD documents. However, these responses and comments are provisional. PAETEC will not make a commitment to MTG before and until we have had an opportunity to properly vet the final documentation associated with MTG via the associated process. PAETEC reserves all our rights accordingly.</p> <p>Also note, Qwest has continued, over CLEC objection, toward implementing MTG, including reviewing draft technical specifications at a time when this activity should not be occurring under the merger settlement agreements and orders. Qwest's conduct is in violation of the merger settlement agreements and orders, and CenturyLink has provided insufficient information. Any participation by PAETEC has been to monitor this activity, over CLEC objection, and does not waive any PAETEC rights. PAETEC has expressed objections and comments on Qwest's approach and process, including the draft technical specifications, and those objections are</p>	PAETEC's comments are noted. Please see response to number one.

	ongoing. PAETEC incorporates its comments and objections by reference here.	
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