

**EXHIBIT BJJ-66 TO THE  
DIRECT TESTIMONY OF  
BONNIE J. JOHNSON  
ON BEHALF OF  
INTEGRA TELECOM**

**STATE OF MINNESOTA  
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Ellen Anderson	Chair
David Boyd	Commissioner
J. Dennis O'Brien	Commissioner
Phyllis Reha	Commissioner
Betsy Wergin	Commissioner

**In the Matter of the Joint Petition for  
Approval of Indirect Transfer of Control  
of Qwest Operating Companies to  
CenturyLink**

**MPUC Docket No. P-421, et.al./PA-10-456**

**In the Matter of the Complaint by Joint  
CLECs against Qwest and CenturyLink  
Regarding OSS Implementation**

**MPUC Docket No. P-5340, et al./C-11-684**

**CENTURYLINK QC'S MOTION FOR CLARIFICATION  
AND RECONSIDERATION**

**INTRODUCTION**

On September 6, 2011, the Commission issued an order<sup>1</sup> in this matter requiring that Qwest Corporation d/b/a CenturyLink QC ("CenturyLink QC"), among other things, (1) stop its planned implementation of Maintenance Tracking Gateway ("MTG") interface; (2) work with CLECs in developing MTG or other alternatives; and (3) comply with all substantive and procedural provisions of the Integra and Joint CLEC Settlement Agreements as outlined in the Commission's March 31, 2011 Order. In the intervening time period, hearing officers

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<sup>1</sup> Order Barring Implementation of New Operational Support Systems and Requiring Cooperation and Filings, Docket Nos. P-421, et al./PA-10-456 and P-5340, 5643, 5323, 5981, 438, 465, 5986, 421/C-11-684 (Sept. 10, 2011) ("Order").

Absent modification by the Commission or courts, CenturyLink QC intends to fully comply with these requirements. In order to do so, and particularly in light of the existing orders upholding CenturyLink's right to proceed with development and implementation of MTG in Colorado and Washington during contested case proceedings, some interpretation questions have arisen regarding these requirements. In order to make sure there is no doubt regarding the Commission's intent, these comments detail how CenturyLink QC interprets these requirements and asks the Commission to clarify or reconsider its Order to the extent that something else is intended.

**A. Geographic Scope of the Order.**

The Order does not explicitly address geographic scope. While MTG is a region-wide system and would be designed to serve customers in 14 states, it is possible to adjust MTG so that it refuses to accept orders from Minnesota. CenturyLink QC understands that the Order addresses Minnesota alone and not systems implementation in other states. This interpretation appears consistent with a statement made by Commissioner Boyd during deliberations: “. . . If this is a tool they want to implement systemwide and they are prohibited from doing so in the state of Minnesota, I don't know what it means to any other state they're working on. . . .”<sup>5</sup>

No other Commissioner appeared to comment on the question of geographic scope. Interpreting the Order as addressing Minnesota alone eliminates jurisdictional issues with the Commission's Order and shows respect for the authority of the commissions in Washington and Colorado to resolve this dispute as it applies in those states. Any other interpretation would go beyond the authority of this Commission.

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<sup>5</sup> August 11 Transcript, p. 69, l. 19-23.

make its decisions temporary until there has been a full opportunity to produce evidence and legal argument on the merits.

Dated this 16th day of September, 2011.

CENTURYLINK QC

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<b>Maintenance Ticketing Gateway (MTG)</b>	
Preliminary Systems Release Notification provided	December 17, 2010
Comment cycle starts	December 17, 2010
Comment cycle ends	January 6, 2011
Qwest Response to CLEC comments	January 13, 2011
Preliminary Implementation Plan Review meeting (rescheduled)	January 19, 2011
Additional Comment cycle starts	January 19, 2011
Additional Comment cycle ends	February 2, 2011
Additional Qwest Response to CLEC comments	February 9, 2011
Draft Technical Specifications Issued	August 5, 2011 <i>Original date for issuance was August 12, 2011</i>
Comment cycle starts	August 5, 2011
Walkthrough of Draft Interface Technical Specifications	August 24, 2011
Comment cycle ends	August 30, 2011
Final Technical Specifications Issued	September 2, 2011
Application to Application Testing Available	November 5, 2011
Release Production Date	December 12, 2011 <b>NOTE: No implementation in the state of Minnesota.</b>

**CEMR December 2011 Release specific to the MTG implementation ONLY**

**(This CEMR release will only impact customers that choose to implement CEMR with an MTG interface.)**

<b>CEMR December 2011 Release</b>	
Draft Release Notes Issued	November 14, 2011
Comment Cycle Starts	November 14, 2011
Comment Cycle Ends	November 17, 2011
Final Release Notes Issued	November 21, 2011
Release Production Date	December 12, 2011 <b>NOTE: No implementation in the state of Minnesota.</b>

**Exhibit C**