

**EXHIBIT BJJ-67 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

From: Johnson, Bonnie J. [<mailto:bjjohnson@integratelecom.com>]
Sent: Tuesday, September 27, 2011 10:31 AM
To: 'New Cr, Cmp'; 'Lynn.Notarianni@dora.state.co.us'; 'Barbara.Anders@dora.state.co.us'; 'mitch.moore@state.or.us'; Redman-Carter, Julia; Haas, William; Hansen, Christopher (Chris); Bilow, Joyce; 'Brenda_Bloemke@cable.comcast.com'; 'jeanne.kulesa@synchronoss.com'; 'Liz Tierney'; 'rgarth@libertybelltelecom.com'; 'mary_lohnes@mimi.net'; 'Shelly.Pedersen@twtelecom.com'; 'jeff.sonnier@sprint.com'; Strombotne, Tracy; 'Michael E Mccarthy (Michael.Mccarthy@state.mn.us)'; Boudhaouia, Jamal; Albersheim, Renee; andrew.bahn@state.mn.us; greg.doyle@state.mn.us; cmpcr@qwest.com; Greg Darnell (greg.darnell@cbeyond.net); jim.hickle@velocitytelephone.com; 'stephen.hayes@state.or.us'; rod.cox@tdsmetro.com; 'MVASconi@utc.wa.gov'; WWeinman@utc.wa.gov; Kathy Troughton (kathy.troughton@chartercom.com); (kwillis@popp.com); Benjamin Silver (bsilver@popp.com); Burke, Loriann (Loriann.M.Burke@xo.com); 'Lyndall.Nipps@twtelecom.com'; 'BWilliam@utc.wa.gov'
Cc: Isaacs, Kimberly D.; Denney, Douglas K.; Prull, Stephanie A.; Clauson, Karen L.; Johnson, Bonnie J.
Subject: CEMR changes - please provide detail

Recent statements by the Merged Company (in Colorado testimony, quoted below) have once again raised the question of what changes are being made and how they affect CEMR users. We need a better understanding of what changes are being made, including in the background, and any potential impact of the proposed changes to CEMR users and their customers. Once again, we ask the Merged Company to please explain more fully. This is not a new request; to re-cap:

On February 20, 2011, Integra asked: "For each function listed in the Qwest CEMR User Guide, provide a status on whether MTG will have the function upon implementation and whether there are any changes to the manner and timing in which the CLEC performs the function or receives information." (See Integra July 18 CMP Matrix, Part A p. 34, Row 23.)

This question is ongoing. If the answer is anything other than "there will be no change at all," please provide the requested information, even if the Merged Company considers the difference to be minor, a slight variation, or a difference in "look and feel."

On March 10, 2011, Qwest responded: "The requirements for the improved system have derived from the existing CEMR/MEDIACC functionality. While the look and feel of the improved GUI may be slightly varied from CEMR, existing query capabilities will be maintained. The presentation provided in the February CMP meeting describes the functionality that will be provided. It is posted as part of this response to comments." (See Integra July 18 CMP Matrix, Part A p. 34, Row 23.)

On March 18, 2011, Integra replied: "CLEC is concerned about Qwest's statement that the "look and feel" of MTG may be different from CEMR. CLEC does not agree to these difference(s). As the debate about functionality in the merger dockets show, CLECs and the Joint Applicants have different views as to functionality, and what Qwest and CenturyLink have said is the same functionality is not always in CLECs' view the same functionality. CLEC does not agree that the types of changes that Qwest is describing are "slight" variations. Qwest did not answer the questions posed by Integra. The answers to these specific questions are not in the February presentation (or the revised March version). Integra's requests for responses from Qwest and CenturyLink to each and every one of these questions is ongoing. Please respond." (See Integra July 18 CMP Matrix, Part A, p. 34, Row 23.)

This question is ongoing. If the answer is anything other than “there will be no change at all,” please provide the requested information, even if the Merged Company considers the difference to be minor, a slight variation, or a difference in “look and feel.”

On May 20, 2011 and July 1, 2011, the Merged Company said: “In response to all of the bulleted questions, to be clear, the CEMR GUI is staying in place. All of the functionality currently present in CEMR will be present when MTG is implemented.” (See Integra July 18 CMP Matrix, Part A, p. 34, Row 23.)

On June 9, 2011, Integra asked a number of questions in its email to CMP, and said: “We need a better understanding of what changes are being made in the background and any potential impact of the proposed changes to CEMR users and their customers. Please explain more fully.” (See Integra July 18 CMP Matrix, Part B, p. 25, Row 59.)

This question is ongoing. If the answer is anything other than “there will be no change at all,” please provide the requested information, even if the Merged Company considers the difference to be minor, a slight variation, or a difference in “look and feel.”

On July 2, 2011, the Merged Company said: “The CEMR GUI application will be revised to also interface with the MTG application to application system. These updates to the CEMR GUI will not impact the CEMR online user functionality, user experience or service standards. Linkage between CEMR and Qwest’s downstream systems is transparent to CEMR users. To the extent there are any changes to CEMR, these will be communicated through CMP.” (See Integra July 18 CMP Matrix, Part B, p. 25, Row 59.)

On July 18, 2011, Integra replied to Qwest’s matrix Row 23 response by cross referencing to the questions and information in Row 9 and Part C of Integra’s July 18 matrix. (See Integra July 18 CMP Matrix, Part A, p. 34, Row 23.) The Merged Company has not responded.

On July 18, 2011, Integra replied to Qwest’s matrix Row 59 response, stating: “An interface cannot be “revised” without potential impact to users of the interface. See Rows 44 and 46 above. When CEMR interfaces with MTG, if MTG goes down, CEMR goes down. CEMR users are impacted by the change to MTG, regardless of whether they remain on CEMR. Qwest is describing an integration of a legacy Qwest system with a non-legacy new system, which is governed by the merger agreements and orders. Qwest has already failed to notify CLECs properly via CMP of outage-causing changes. See Row 46 above.” (See Integra July 18 CMP Matrix, Part B, p. 25, Row 59.)

On September 15, 2011, Renee Albersheim on behalf of the Merged Company in Colorado Docket No. 11F-436T Answer Testimony (page 23, line 13 – page 24, line 2), under the heading “The Harm That Could Result if MEDIACC Fails,” said: “If MEDIACC fails and MTG is not available, all CLECs will have to submit repair requests to Qwest/CenturyLink by telephone. This is true of both MEDIACC users and CEMR users, as CEMR relies on MEDIACC to perform repair functions.” In response to the question “Would this ultimately impact end-user customers?,” Ms. Albersheim responds: “Yes. This would impact the CLECs’ end-user customers, and it would impact Qwest/CenturyLink end-user customers.”

On September 15, 2011, Renee Albersheim on behalf of the Merged Company in Colorado Docket No. 11F-436T Answer Testimony (page 23, lines 7-11) said: “Q. **WILL CLEC USERS SEE ANY DIFFERENCE AT ALL BETWEEN CEMR/MEDIACC AND CEMR/MTG?** A. Yes, there will be minor differences. A couple of

screens that display information from legacy Qwest systems to the CLEC users will have a slightly altered appearance.”

The Merged Company’s testimony has, once again, raised the issue of whether and why (and when) there will be differences in CEMR. For example, if the screens look different, the CEMR user experience changes, and training may be needed.

First and foremost, the Merged Company should immediately respond as to the reason(s) why there will be any changes at all (including the changes that lead Renee Albersheim to respond “yes” to the above-quoted question in her testimony). Is the only purpose of the December 2011 CEMR Release (see Attachment M to 9/21/11 systems distribution package) to “point” CEMR to MTG for certain (as yet undisclosed) users? If not, please explain any and all other purposes.

In any event, how does changing CEMR so that, instead of going through MEDIACC first and then MEDIACC interfaces with Qwest’s back-end systems (see Merged Company 7/1/11 Matrix, p. 56), CEMR goes through MTG first and then MTG interfaces with Qwest’s back-end systems, result in differences that CLEC users will see between CEMR/MEDIACC and CEMR/MTG? Please describe in detail.

The Merged Company should provide comparable (apples-to-apples) information explaining and illustrating any differences between CEMR/MEDIACC and CEMR/MTG and should provide it as soon as possible. (The CEMR release calendar shows that the comment cycle starts on Nov. 14 and ends on Nov. 17, only a few days later. Particularly given how long CLECs have been requesting the information and the importance of these issues, that is insufficient time.)

Please explain each change that will result in such differences and how/when those changes are being made as well as the differences themselves (including any differences that the Merged Company considers to be minor, a slight variation, or a difference in “look and feel”).

This is an important issue. Integra request a prompt and detailed response in CMP.

Thank you for your attention,
Bonnie

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

Sent: Friday, September 30, 2011 1:10 PM

To: Johnson, Bonnie J.; 'New Cr, Cmp'; 'Lynn.Notarianni@dora.state.co.us'; 'Barbara.Anders@dora.state.co.us'; 'mitch.moore@state.or.us'; Haas, William; Hansen, Christopher (Chris); Bilow, Joyce; 'Brenda_Bloemke@cable.comcast.com'; 'jeanne.kulesa@synchronoss.com'; 'Liz Tierney'; 'rgarth@libertybelltelecom.com'; 'mary_lohnes@mimi.net'; 'Shelly.Pedersen@twtelecom.com'; 'jeff.sonnier@sprint.com'; Strombotne, Tracy; 'Michael E Mccarthy (Michael.Mccarthy@state.mn.us)'; Boudhaouia, Jamal; Albersheim, Renee; andrew.bahn@state.mn.us; greg.doyle@state.mn.us; cmpcr@qwest.com; Greg Darnell (greg.darnell@cbeyond.net); jim.hickle@velocitytelephone.com; 'stephen.hayes@state.or.us'; rod.cox@tdsmetro.com; 'MVasconi@utc.wa.gov'; WWeinman@utc.wa.gov; Kathy Troughton (kathy.troughton@chartercom.com); (kwillis@popp.com); Benjamin Silver (bsilver@popp.com); Burke, Loriann (Loriann.M.Burke@xo.com); 'Lyndall.Nipps@twtelecom.com'; 'BWilliam@utc.wa.gov'

Cc: Isaacs, Kimberly D.; Denney, Douglas K.; Prull, Stephanie A.; Clauson, Karen L.

Subject: RE: CEMR changes - please provide detail

CMP,

Likewise, PAETEC anticipates detailed responses to the below email and other related emails previously sent.

Thank you,
Julia



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From: Johnson, Bonnie J.

Sent: Wednesday, October 12, 2011 2:18 PM

To: 'New Cr, Cmp'; 'Redman-Carter, Julia'; 'Lynn.Notarianni@dora.state.co.us'; 'Barbara.Anders@dora.state.co.us'; 'mitch.moore@state.or.us'; 'Haas, William'; 'Hansen, Christopher (Chris)'; 'Bilow, Joyce'; 'Brenda_Bloemke@cable.comcast.com'; 'jeanne.kulesa@synchronoss.com'; 'Liz Tierney'; 'rgarth@libertybelltelecom.com'; 'mary_lohnes@mmi.net'; 'Shelly.Pedersen@twtelecom.com'; 'jeff.sonnier@sprint.com'; 'Strombotne, Tracy'; 'Michael E Mccarthy (Michael.Mccarthy@state.mn.us)'; 'Boudhaouia, Jamal'; 'Albersheim, Renee'; 'andrew.bahn@state.mn.us'; 'greg.doyle@state.mn.us'; 'cmpcr@qwest.com'; 'Greg Darnell (greg.darnell@cbeyond.net)'; 'jim.hickle@velocitytelephone.com'; 'stephen.hayes@state.or.us'; 'rod.cox@tdsmetro.com'; 'MVASconi@utc.wa.gov'; 'WWeinman@utc.wa.gov'; 'Kathy Troughton (kathy.troughton@chartercom.com)'; ' (kwillis@popp.com)'; 'Benjamin Silver (bsilver@popp.com)'; 'Burke, Loriann (Loriann.M.Burke@xo.com)'; 'Lyndall.Nipps@twtelecom.com'; 'BWilliam@utc.wa.gov'

Cc: Isaacs, Kimberly D.; Denney, Douglas K.; Prull, Stephanie A.; Clauson, Karen L.; Johnson, Bonnie J.

Subject: CEMR changes - please provide detail

Susan,

Integra appreciates the response. You said below that the upcoming CEMR release “is specific to the MTG release ONLY and is for those wholesale customers who decide they would like to implement the version of CEMR that interfaces with MTG.” It is not the case that the MTG release will apply only to wholesale customers who “decide” to use MTG, however, if there is a CEMR and/or MEDIACC unrecoverable failure. In Colorado, CenturyLink said that MEDIACC will likely begin experiencing problems in the near future. Also, if a problem occurs during transition, CEMR users will be impacted. In CMP, Qwest (Tracy Strombotne) said: “today, CEMR interfaces with MEDIACC and we would like it to interface with MTG. Tracy said it is possible that if **Qwest swaps out the backend, there could be an issue with the front end.**” The front end referenced here is CEMR. Your email fails to acknowledge that, if MEDIACC fails or if a problem occurs during integration (e.g., swapping out the backend), CLECs using CEMR will be forced to use CEMR with the MTG interface. Therefore, CLEC users are forced to expend resources to monitor and review and comment on the changes CenturyLink is providing in CMP regarding the upcoming CEMR release. Per the pre-merger assurances and merger settlement agreements, that work should not be occurring during this time.

Your email below references QPortal and suggests that Integra’s questions, joined by PAETEC, relate only to QPortal or events before the Merged Company reversed course and indicated it would not use QPortal. That is not the case either. Qwest (Tracy Strombotne) said on the 6/8/11 ad-hoc CMP call that CenturyLink was not going to “Change out CEMR.” Integra’s request includes questions submitted to the Merged Company after that date, and they are not tied to QPortal. For example, we asked about the following CenturyLink’s assurance from July 2, 2001 (as compared to its more recent statements that changes will occur):

“The CEMR GUI application will be revised to also interface with the MTG application to application system. **These updates to the CEMR GUI will not impact the CEMR online user functionality, user experience** or service standards. Linkage between CEMR and Qwest’s downstream systems is transparent to CEMR users. To the extent there are any changes to CEMR, these will be communicated through CMP.” (See Integra July 18 CMP Matrix, Part B, p. 25, Row 59.) (emphasis added)

Contrary to the above-quoted assurance, your email below refers to changes that will impact the user experience. A change to the format of circuit history and report history screens is a change to user experience.

In your email below, you said that the only technical change to CEMR is to “incorporate the system linkage to MTG instead of MEDIACC in the new version of CEMR. There are some specific format changes to both the “circuit history” and “report history” screens that do not contain any content changes.” This statement simply re-states your previous position without answering the question asked as to how and why the change (or “incorporating system linkage”) necessitates a change in format or any other change to CEMR. As part of answering Integra’s ongoing questions below, please describe what occurs as part of incorporating the “system linkage” and why this would drive format or other changes to CEMR.

We do not agree that a format change does not change content. Training is still needed as to the format change.

With respect to your claim that you are following the “normal CMP timeline” for changes, you fail to note that this is not a “normal” circumstance, because normally there is not a merger settlement agreement to consider. Qwest and CenturyLink committed to perform the CMP procedures plus the merger procedures. The Merged Company is disregarding the latter.

In any event, Integra is your customer. You obviously already know of changes that you plan to make to CEMR, and as our vendor, you should be providing this information on a cooperative basis to your customer. Nothing in the CMP document precludes you from providing the information earlier and as soon as it is available. Good customer service would dictate that you provide more information earlier.

Your email is non-responsive as well as incomplete. You did not answer the specific question in my email below. Those questions are ongoing.

Bonnie

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From: New Cr, Cmp [<mailto:cmpcr2@CenturyLink.com>]

Sent: Tuesday, October 11, 2011 12:43 PM

To: Redman-Carter, Julia; Johnson, Bonnie J.; New Cr, Cmp; 'Lynn.Notarianni@dora.state.co.us'; 'Barbara.Anders@dora.state.co.us'; 'mitch.moore@state.or.us'; Haas, William; Hansen, Christopher (Chris); Bilow, Joyce; 'Brenda_Bloemke@cable.comcast.com'; 'jeanne.kulesa@synchronoss.com'; 'Liz Tierney'; 'rgarth@libertybelltelecom.com'; 'mary_lohnes@mmi.net'; 'Shelly.Pedersen@twtelecom.com'; 'jeff.sonnier@sprint.com'; Strombotne, Tracy; 'Michael E Mccarthy (Michael.Mccarthy@state.mn.us)'; Boudhaouia, Jamal; Albersheim, Renee; andrew.bahn@state.mn.us; greg.doyle@state.mn.us; cmpcr@qwest.com; Greg Darnell (greg.darnell@cbeyond.net); jim.hickle@velocitytelephone.com; 'stephen.hayes@state.or.us'; rod.cox@tdsmetro.com; 'MVasconi@utc.wa.gov'; WWeinman@utc.wa.gov; Kathy Troughton (kathy.troughton@chartercom.com); (kwillis@popp.com); Benjamin Silver (bsilver@popp.com); Burke, Loriann (Loriann.M.Burke@xo.com); 'Lyndall.Nipps@twtelecom.com'; 'BWilliam@utc.wa.gov'

Cc: Isaacs, Kimberly D.; Denney, Douglas K.; Prull, Stephanie A.; Clauson, Karen L.

Subject: RE: CEMR changes - please provide detail

Bonnie and Julia,

The CEMR release that is included on the most recent CenturyLink OSS Interface Release calendar available at <http://www.centurylink.com/wholesale/cmp/teammeetings.html> is specific to the MTG release ONLY and is for those wholesale customers who decide they would like to implement the version of CEMR that interfaces with MTG. The only technical change to CEMR is to incorporate the system linkage to MTG instead of MEDIACC in the new version of CEMR. There are some specific format changes to both the "circuit history" and "report history" screens that do not contain any content changes. Those changes will be fully disclosed with the CEMR draft Release Notice that is to be issued on November 14, 2011. Again, that CEMR Release notice is only applicable to those customers who are choosing to utilize CEMR with an MTG interface. For all other Wholesale CEMR customers, there is no change to CEMR with the December release. In regard to the concern expressed on the short timeframe for CLEC comments on the CEMR release notice, that is the normal CMP timeline for any GUI change.

In response to Integra citations of CenturyLink responses prior to June 2011 that are included below, during that period, Qwest/CenturyLink was initially planning on incorporating QPortal as the GUI tool in conjunction with the MTG functionality. On June 17, 2011, Qwest/CenturyLink updated the CMP Change Request to remove wording regarding MTG including a replacement for CEMR.

Thank you,
Susan Lorence
Wholesale – CMP
402 422-4999
CenturyLink