

**EXHIBIT BJJ-68 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

**QWEST/CENTURYLINK STATEMENTS THAT IT
USES MEDIACC/CEMR TODAY
AND PLANS TO MOVE ITSELF TO MTG**

MEDIACC

- Qwest and CenturyLink representatives told Integra representatives at an in-person meeting that Qwest uses MEDIACC for itself with a significant percentage of Qwest repair tickets being in MEDIACC. (May 4, 2011 meeting)
- Qwest/CenturyLink admits the following: “Qwest uses and offers CEMR and MEDIACC in Colorado today. Qwest uses MEDIACC for itself with a significant percentage of Qwest repair tickets being in MEDIACC. In addition, Qwest offers CEMR and MEDIACC to CLECs to exchange repair information between Qwest and CLECs.” Colorado Docket No. 11F-436T, Answer to Amended Complaint, p. 6, ¶30.¹ (June 28, 2011 Complaint; July 18, 2011 Answer)
- Qwest/CenturyLink admits the following: “Based upon Qwest’s representation in CMP, Qwest will transition its ‘internal customers’ to MTG before, and/or in the absence of, any CLECs moving to MTG. Qwest has taken steps in furtherance of deploying and implementing MTG for itself and its internal customers.” Washington Docket No. UT-111254, Answer ¶107.² (July 11, 2011 Complaint; August 2, 2011 Answer)
- “Qwest/CenturyLink does intend to implement MTG for its own use” Colorado Docket No. 11F-436T, 6/20/11 Answer Subject to Motion to Dismiss, p. 5. (June 20, 2011)
- “Tracy Strombotne – Qwest . . . Tracy said legacy Qwest uses MEDIACC today and will have an opportunity to move to MTG.” Qwest-prepared CMP meeting minutes, BJJ-8 at JC000940. (June 15, 2011)
- “MTG will include legacy Qwest data.” Qwest CMP Matrix, p. 22, Exhibit BJJ-53 at JC000775. (July 1, 2011)
- “Qwest continues to plan on first ‘moving’ itself to the MTG system once it has been internally installed and tested.” Qwest CMP Matrix, p. 54, Exhibit BJJ-53 at JC000807. (July 1, 2011)
- “[O]n DECEMBER 12, we will migrate the software and then we will move OVER THE FIRST OF OUR internal customers. She said we would THEN work with interested external customers to point to CEMR TO MTG OR B2B [application-to-application] WITH MTG”); Qwest-prepared CMP meeting minutes, Exhibit BJJ-8 at JC000942. (June 15, 2011)

¹ But see, Washington Docket No. UT-111254, Answer to Formal Complaint and Petition, ¶36 (denying the same allegation that was admitted in Colorado). The Merged Company has moved to amend its Answer in Colorado in other respects, but not as to this admission.

² The Merged Company has moved to amend its Answer regarding similar language in Colorado.

- “For any other internal or external customers that want to test or use the system, they can.” Qwest-prepared CMP meeting minutes, Exhibit BJJ-8 at JC000942. (June 15, 2011)
- “MTG will not replace CEMR or MEDIACC, *at least for required CLEC use*, until late in 2013.” Washington Docket No. UT-111254, Answer ¶76 (emphasis added). “Denied that MTG will replace MEDIACC, at least for CLEC use . . . until 2013.” Washington Docket No. UT-111254, Answer ¶66. The use of the phrase “at least for CLEC use” indicates that the Merged Company is reserving to itself the ability to replace MEDIACC before the end of the 30-month period for itself and its retail customers. (July 11, 2011 Complaint; August 2, 2011 Answer)
- “Qwest/CenturyLink receives trouble reports from MEDIACC and publishes events related to those trouble reports back to the end users of MEDIACC. Qwest/CenturyLink will have the same interactions with end users of MTG.” Colorado Docket No. 11F-436T, Qwest/CenturyLink Response to Joint CLEC Information Request 21(a). (August 1, 2011)
- In Minnesota, the Merged Company argued that, if Qwest Corporation uses MTG for its retail customers, that this does not violate the “use and offer to wholesale customers” language of the settlement agreements. Specifically, the Merged Company argues:

Integra suggests that if CenturyLink uses MTG for its retail customers that this somehow violates the ‘use and offer to wholesale customers’ requirements. This section has nothing to do with retail customers. CenturyLink has repeatedly stated that it will continue to use MEDIACC for its CLEC customers that wish to continue to use it. In other words, it will continue to be ‘used and offered to wholesale customers’ as required.³ (July 22, 2011)

CEMR

- Joint CLECs asked in Information Requests for Qwest/CenturyLink to: “Identify any CenturyLink entity(ies) that will use CEMR during the 30-month period following the Closing Date, and any CenturyLink entity(ies) that will use CEMR after the end of that 30-month period. Identify any CenturyLink entity(ies) that does not use or offer CEMR today that will use or offer CEMR going forward.” Qwest/CenturyLink responded (Aug. 1, 2011): “Response: Employees within the following Legacy Qwest departments currently use CEMR, and will use CEMR going forward:
 - Wholesale Markets
 - Network Services
 - Business Markets Group
 - Information Technology
 - Finance”⁴

³ See Minnesota Docket Nos. P-421, et al./PA-10-456, CenturyLink Reply Comments, July 22, 2011, p. 9, note 11.

⁴ See Colorado Docket No. 11F-436T, Qwest/CenturyLink Responses to Joint CLEC Information Request, 4d (Aug. 1, 2011) (respondents Legal, Cecilia Tank, Renee Albersheim). Although the Joint CLECs did not limit the question

- “CenturyLink does have internal departments that use CEMR on a limited basis.”⁵ (Aug. 24, 2011)
- “Retail customers do not typically have the ability to go in directly and order repairs.... The CEMR system there are a handful across the country that -- that have that sort of arrangement, and those tend to be governmental entities that have that ability.”⁶ (Aug. 11, 2011)

MTG – USE BY LEGACY CENTURYLINK

- “CenturyLink continues to evaluate MTG as a potential *replacement* solution for systems currently used by *all CenturyLink affiliates*.”⁷ (May 2, 2011)
- Representatives of the Merged Company (legacy Qwest and legacy CenturyLink) told Integra that the Merged Company has decided to move to a single OSS application for all Merged Company entities for repair – MTG. (May 4, 2011 meeting)
- “It is anticipated that MTG will eventually be a system adopted for all CenturyLink CLECs but a final decision on this issue has not yet been made.”⁸ (July 1, 2011)
- “Qwest/CenturyLink has recommended to the Executive Leadership Team that MTG be implemented in the Legacy CenturyLink territories. The Executive Leadership Team has yet to make a final decision on MTG.” Albersheim Answer Testimony, CO Docket No. 11F-436T, Sep. 15, 2011, p. 21, lines 14-16. (Sept. 15, 2011)

to using CEMR for repair, when asked the same question in Washington, Qwest/CenturyLink responded that “No CenturyLink entities use CEMR for repair at this time. CenturyLink cannot predict if any CenturyLink entities will use CEMR after the end of the 30 month period following the close of the merger, or going forward.” See Qwest/CenturyLink Responses to Joint CLECs’ First Set of Data Requests, Docket No. UT-111254 (Sept. 7, 2011).

⁵ See August 24, 2011 letter from Jason Topp (CenturyLink Senior Corporate Counsel – Regulatory) responding to Greg Merz (Grey Plant Mooty) in Minnesota Docket Nos. P-421, et al./PA-10-456 regarding whether CenturyLink uses CEMR and MEDIACC for itself.

⁶ See Hrg. Tr., p. 56, lines 19-25, August 11, 2011 Minnesota PUC hearing (Jason Topp, counsel for CenturyLink).

⁷ Email from Merged Company attorney to Integra (May 2, 2011) (emphasis added) at JC000294.

⁸ Exhibit BJJ-53, July 1, 2011 Qwest CMP Matrix, p. 29 (JC000782); see also Qwest and CenturyLink Response to Integra CO Discovery Request No. 24(c) (Aug. 1, 2011) (“It is anticipated that MTG will eventually be a B2B repair system adopted for all CenturyLink entities’ customers, but a final decision on this issue has not yet been made.”).