

**EXHIBIT BJJ-69 TO THE  
DIRECT TESTIMONY OF  
BONNIE J. JOHNSON  
ON BEHALF OF  
INTEGRA TELECOM**

**INTEGRA’S REPEATED, UNANSWERED<sup>1</sup> INQUIRIES AS TO THE AGE/STABILITY/POTENTIAL FAILURE OF OTHER LEGACY QWEST OSS**

- “... we do not know what other OSS changes the company may be planning or may announce before the closing date but implement after the closing date. If CLECs disagree with proposed OSS changes, and the changes would occur (like these) during the 2 year timeframe covered by the settlement agreement, what prevents the company from making those changes, if the company can make these CEMR/MEDIACC changes? Does the company distinguish the CEMR/MEDIACC situation and, if so, how?...”<sup>2</sup>
- “Are there any other OSS at Qwest that are approximately that old or older? (For example, IMA is at least 12 years old, correct?) Is Qwest claiming any of them are at the end of their life?”<sup>3</sup>
- “As Qwest is relying on the age of the OSS as its reason for the alleged replacement need, Qwest in some respects cannot distinguish this situation from other OSS of the same or similar age. If Qwest sets a precedent in this situation of proceeding ahead of merger agreement timelines or without obtaining consent and approval for modifications of obligations, what precludes Qwest from doing so for any other OSS? Do Qwest and/or CenturyLink distinguish CEMR/MEDIACC and, if so, how?”<sup>4</sup>
- “...Until now, although Qwest has suggested there are extenuating circumstances with respect to CEMR/MEDIACC, I believe that Qwest has not recognized this as a unique situation. Without distinguishing this situation from others, however, a precedent could be set that would be a real problem for us as well as other CLECs and regulatory authorities...”<sup>5</sup>

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<sup>1</sup> In its October 6, 2011 Minnesota Compliance Filing, the Merged Company finally said that “MEDIACC is an Exception” and “No other system has been classified by this team as having reached ‘end of life’ status.” Qwest/CenturyLink Report on MEDIACC Risks, Minnesota PUC Docket Nos. P-421, et al./PA-10-456 & P-5340, et al./C-11-684, Oct. 6, 2011 [“Merged Company MN Compliance Filing”], p. 9. See discussion in Section VI(D) of Mr. Denney’s Washington direct testimony. It is unclear whether this is a final or reliable response. After Joint CLECs prevailed on a motion to compel discovery in Colorado requiring a response to request number 8 (quoted below; same request was number 13 in Washington), counsel for CenturyLink requested additional time to respond. In Washington, counsel for CenturyLink said in an Oct. 6, 2011 letter: “The information does not presently exist, and the preparation of the response will require significant research and analysis.” In Colorado, counsel for CenturyLink requested an extension of time to respond, indicating in an Oct. 4, 2011 email that, “Our people tell us they cannot complete the work until October 21 at the earliest.”

<sup>2</sup> See Integra 2/2/11 email to Qwest and CenturyLink legal, Exhibit BJJ-17 at JC000098; also referenced in Mr. Denney’s August 12, 2011 Direct Testimony, p. 104, lines 15-22, Colorado Docket No. 11F-436T.

<sup>3</sup> See Integra 3/18/11 Reply Matrix, p. 3, Row 1d, Exhibit BJJ-30 at JC000213; Qwest 5/20/11 Matrix Response p. 4, Row 1d, Exhibit BJJ-40 at JC000315; and Integra’s 7/18/11 Matrix Response, Part A, p. 4, Row 4, Exhibit BJJ-54 at JC000820.

<sup>4</sup> See Integra 3/18/11 Reply Matrix, p. 7, Row 1g, Exhibit BJJ-30, at JC000217; Qwest 5/20/11 Matrix Response, p. 10, Row 1g, Exhibit BJJ-40 at JC000321.

<sup>5</sup> See Integra’s President’s email to the Merged Company, Exhibit BJJ-34 at JC000284; also referenced in Mr. Denney’s August 12, 2011 Direct Testimony, p. 105, lines 5-13, Colorado Docket No. 11F-436T.

- “Qwest’s answer on 7/1/11 is identical to its answer of 5/20/11. Qwest did not address CLEC’s concerns. Qwest did not answer these questions: As Qwest is relying on the age of the OSS as its reason for the alleged replacement need, Qwest in some respects cannot distinguish this situation from other OSS of the same or similar age. If Qwest sets a precedent in this situation of proceeding ahead of merger agreement timelines or without obtaining consent and approval for modifications of obligations, what precludes Qwest from doing so for any other OSS? Do Qwest and/or CenturyLink distinguish CEMR/MEDIACC and, if so, how?”<sup>6</sup>
- “Identify any legacy Qwest OSS or system used by, supporting, or interfacing with Qwest wholesale customers or their OSS or systems (other than MEDIACC; see above request) as of the Closing Date that is outdated, obsolete, unstable and/or uses manufacturer-discontinued hardware or unsupported software, or that is fourteen years old or older, or that will likely begin experiencing problems in the near future...”<sup>7</sup>
- “Qwest referred to the age of the repair systems but did not discuss that other Qwest systems are of a similar age. Once again, Qwest did not respond to the question about Embarq’s repair system and the CenturyLink billing integration and referred it to CenturyLink (though Integra had previously asked CenturyLink legal and executive but not obtained a response).”<sup>8</sup>
- “Mr. Hunsucker did not address the age of Qwest’s other OSS, which were also built during roughly the same time period, and therefore he did not address how this stated rationale would distinguish maintenance and repair from other OSS. His response created uncertainty for CLECs as to, among other things, whether the Merged Company will announce similar changes to other OSS without following the settlement agreement procedures, including pre-implementation notice to state commissions and the FCC.”<sup>9</sup>

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<sup>6</sup> See Integra’s 7/18/11 Matrix Response, pp. 10-11, Row 7, Exhibit BJJ-54, at JC000826-JC000827.

<sup>7</sup> See Joint CLECs First set of information requests, request no. 13, p. 25, Washington Docket No. UT-111254; Joint CLECs First set of information requests, request no. 8, p. 10, Colorado Docket No. 11F-436T; Joint CLECs’ Motion to Compel Discovery, p. 4, Colorado Docket No. 11F-436T; and also referenced in Mr. Denney’s August 12, 2011 Direct Testimony, p. 103, lines 1-5, Colorado Docket No. 11F-436T. This is the request that was the subject of Joint CLECs’ successful Colorado motion to compel discovery and for which, in both Washington and Colorado, the Merged Company said it was not yet prepared to respond, as discussed in note 1 above.

<sup>8</sup> See Mr. Denney’s August 12, 2011 Direct Testimony, p. 36, lines 7-12, Colorado Docket No. 11F-436T.

<sup>9</sup> See Mr. Denney’s August 12, 2011 Direct Testimony, p. 102, lines 9-14, Colorado Docket No. 11F-436T.