

**EXHIBIT BJJ-70 TO THE
DIRECT TESTIMONY OF
BONNIE J. JOHNSON
ON BEHALF OF
INTEGRA TELECOM**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

Docket No. 11F-436T

INTEGRA TELECOM, PAETEC BUSINESS SERVICES AND TW TELECOM OF
COLORADO,

Complainants,

v.

QWEST CORPORATION AND CENTURYLINK,

Respondents.

ANSWER TESTIMONY

OF

RENÉE ALBERSHEIM

CENTURYLINK, INC.

September 15, 2011

1 A. No. CLEC users, like Integra, will not have to perform any internal systems development
2 work in order to switch to CEMR/MTG.

3 Q. **WILL CLEC USERS OF CEMR/MEDIACC NEED ANY TRAINING WHEN**
4 **THEY SWITCH TO CEMR/MTG?**

5 A. No. CEMR/MTG will function the same way that CEMR/MEDIACC does today. The
6 menus and system options that are available today will be available with CEMR/MTG.

7 Q. **WILL CLEC USERS SEE ANY DIFFERENCE AT ALL BETWEEN**
8 **CEMR/MEDIACC AND CEMR/MTG?**

9 A. Yes, there will be minor differences. A couple of screens that display information from
10 legacy Qwest systems to the CLEC users will have a slightly altered appearance.
11 However, all of the information contained in those screens will be the same.³⁶

12

13 **X. THE HARM THAT COULD RESULT IF MEDIACC FAILS**

14 Q. **WHAT IS THE IMPACT TO CLECS IF MEDIACC FAILS AND MTG HAS NOT**
15 **BEEN DEVELOPED?**

16 A. If MEDIACC fails and MTG is not available, all CLECs will have to submit repair
17 requests to Qwest/CenturyLink by telephone. This is true of both MEDIACC users and
18 CEMR users, as CEMR relies on MEDIACC to perform repair functions.

19 Q. **WOULD THIS ULTIMATELY IMPACT END-USER CUSTOMERS?**

³⁶ See Confidential Exhibit RA-12 containing a screen shot of CEMR/MEDIACC today, and a mock up of how data may be presented in CEMR/MTG.

1 A. Yes. This would impact the CLECs' end-user customers, and it could impact
2 Qwest/CenturyLink end-user customers. The lack of automation for CLEC repair
3 requests will inevitably slow down Qwest/CenturyLink's responsiveness to CLEC repair
4 requests, and is likely to slow down Qwest/CenturyLink's responsiveness to its retail
5 customers, as Qwest/CenturyLink would have to divert resources to assist with telephonic
6 CLEC repair tickets.

7 Q. **IF MEDIACC FAILS AND MTG IS AVAILABLE, WHICH CLECS WILL BE**
8 **ABLE TO TAKE IMMEDIATE ADVANTAGE OF MTG'S AVAILABILITY?**

9 A. If MEDIACC fails and MTG is available, those CLECs who use CEMR, such as Integra,
10 will be able to take immediate advantage of MTG's availability. It will be an easy matter
11 to switch CEMR/MEDIACC to CEMR/MTG. This is due in part to the fact that CEMR
12 already uses XML as a communication protocol.

13 Q. **IF MEDIACC FAILS, WILL CLECS USING MEDIACC BE ABLE TO**
14 **TRANSITION IMMEDIATELY TO MTG?**

15 A. That depends. If CLECs have already developed an interface to MTG, they should be
16 able to transition fairly quickly from MEDIACC to MTG. The amount of time required
17 for the transition will depend on the stage of the development of their interface. If a
18 vendor such as Synchronoss has developed an interface to MTG, the CLECs who use
19 MEDIACC will have the option of using the vendor interface to MTG. Those CLECs
20 using MEDIACC who have not developed an interface to MTG, and who do not wish to
21 use a vendor, will have to develop that interface before they can transition to MTG.

22 Q. **CAN CENTURYLINK PREDICT IF OR WHEN MEDIACC WILL FAIL?**