

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF A COMPLAINT
BY THE JOINT CLECs AGAINST
THE JOINT APPLICANTS
REGARDING OSS FOR
MAINTENANCE AND REPAIR

Docket No. UT-111254

**JOINT CLECS RESPONSES TO QWEST CORPORATION/CENTURYLINK'S
FIRST SET OF DATA REQUESTS**

Advanced Telecom, Inc. dba Integra; Electric Lightwave, LLC dba Integra; Eschelon Telecom of Washington, Inc. dba Integra Telecom; Oregon Telecom Inc. dba Washington Telecom dba Integra; Unicom f/k/a United Communications, Inc. dba Integra (together "Integra"); McLeod USA Telecommunications Services L.L.C., dba PAETEC Business Services ("PAETEC"); and **tw telecom of washington llc** ("**tw telecom**") (collectively "Joint CLECs"), for their joint responses to Qwest/CenturyLink's First Set of Discovery Requests, state as follows:

GENERAL OBJECTIONS TO ALL DISCOVERY REQUESTS (ONGOING)

1. Joint CLECs object to the Requests to the extent they are vague, over-broad and/or unduly burdensome.
2. Joint CLECs object to the Requests to the extent they seek information subject to the attorney-client privilege, work product doctrine, or any other privilege recognized by the State of Colorado and information that is trade secret, confidential, sensitive, competitive in nature or proprietary.
3. Joint CLECs object to the Requests to the extent that they seek information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence.
4. Joint CLECs object to the Requests to the extent that they seek a legal conclusion.

REQUESTS

Request No. 1-1: Do you communicate repair issues with any carrier via the ATIS standard today?

Objection: The Joint CLECs further object to the request for carriers other than legacy Qwest Corporation on the grounds that it seeks information that is not relevant to any matter at issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The standard that a CLEC uses to communicate with another carrier is irrelevant to compliance of Qwest and CenturyLink with their legal obligations, including obligations set forth in the Commission’s order approving the merger of Qwest and CenturyLink (“Merger Approval Order”), settlement agreements entered into with Integra, Staff, PAETEC and **tw telecom** in order to obtain approval of the merger (“Settlement Agreements”), interconnection agreements, and the federal Telecommunications Act. Joint CLECs further object to the request on the ground that it is vague and ambiguous. Joint CLECs further object that “communicate” is vague as used here. Joint CLECs understand the request to be asking how trouble report information is submitted to and received from Qwest (or other carriers). It is the Joint CLECs’ understanding that the acronym “ATIS” refers to an organization – Alliance for Telecommunications Industry Solutions – and not a particular standard. Accordingly, the Joint CLECs are unable to answer the request as phrased. CMIP¹ and XML are two industry-recognized standards used for the communication of information regarding repair and maintenance issues.

Response: Subject to, and without waiving, the foregoing objections, Joint CLECs respond as follows:

PAETEC: Yes, for CMIP; yes for XML. PAETEC exchanges repair information with AT&T via XML and with Qwest via CMIP. Regarding Qwest, see below. With respect to carriers other than Qwest:

¹ Although the Merged Company has referred to CMIP as “no longer-standard” (In the Matter of a Complaint by the Joint CLECs Against the Joint Applicants Regarding OSS for Maintenance and Repair, WUTC Docket No. 1112544 (“WA Merger Compliance Docket”), Declaration of Renee Albersheim in Support of Answer to Motion for Injunction, August 18, 2011, Affidavit, p. 7, ¶VI), CMIP is an existing ATIS standard. See <http://www.atis.org/docstore/product.aspx?id=21171>.

- a. AT&T: PAETEC exchanges repair information with AT&T using a B2B interface that uses an XML protocol. The conversion from CMIP to XML protocol took approximately 18 months to complete the coding changes, train, test and transition.
- b. Verizon: PAETEC communicates with Verizon Business using CMIP protocol. PAETEC uses Verizon's online gateways to exchange repair information: (i) VTAG for special access circuits, and (ii) LSI for UNE circuits. Both are web based interfaces similar to CEMR in that they are not e-bonded with PAETEC back office systems.
- c. Sprint: PAETEC does not operate in any areas where Sprint has a section 251/271 compliant OSS.

tw telecom: Yes, for CMIP; yes for XML. **tw telecom's** electronic bonded vender Synchronoss exchanges repair information via XML with AT&T and Verizon and via CMIP with Qwest (see below). Regarding legacy Embarq territory, see pages 6-7 of the direct testimony of Lyndall Nipps filed in Colorado PUC Docket No. 11F-436T.

Integra: No for XML. For CMIP, yes to the extent that CEMR interfaces with Qwest's back end systems via MEDIACC (see below).

In further response, the Joint CLECs note that, if a carrier is currently using XML for repair with one carrier, this does not reduce the cost and effort associated with switching from CMIP to XML for repair with another carrier.

To the extent that the request is intended to seek information regarding the Joint CLECs' use of either or both of these two protocols for repairs with Qwest Corporation ("any carrier"), the Joint CLECs' state that they use more than one method for exchanging trouble report information with Qwest, as follows:

Integra, PAETEC and **tw telecom** may exchange trouble report information with Qwest via telephone (*e.g.*, calls to the support centers/help desk) or in person (*e.g.*, during a joint meet). Telephone calls and in person discussions are not made via CMIP or XML.

PAETEC and **tw telecom** use MEDIACC to exchange trouble report information with Qwest. MEDIACC “uses CMIP communication protocol.”² Specifically with respect to MEDIACC, PAETEC uses Electronic Bonded Trouble Administration (“EBTA”) to directly connect into Qwest’s MEDIACC OSS for auto ticket generation and real time communications throughout the life-cycle of the ticket, that trigger next step processes within PAETEC internal systems, as further described in the direct testimony of Justine Blanchard filed in the Colorado Merger Compliance Docket. **tw telecom** uses a Synchronoss gateway to MEDIACC, and MEDIACC serves as the gateway to pass trouble tickets and repair-related information to Qwest’s legacy trouble reporting system, CEMR. **tw telecom**’s electronic bonded vender Synchronoss communicates trouble ticketing via ATIS standards.

PAETEC uses CEMR primarily as a back-up to exchange trouble report information with Qwest when MEDIACC is unavailable. Integra and **tw telecom** at times use CEMR via MEDIACC to exchange trouble report information with Qwest. While CEMR is not based on CMIP or XML, CEMR, “goes through MEDIACC first and then MEDIACC interfaces with Qwest’s back-end systems.”³ MEDIACC “uses CMIP communication protocol.”⁴ Therefore, Integra, PAETEC and **tw telecom** use MEDIACC in this manner for exchanging trouble report information with Qwest, because CEMR goes through MEDIACC. For example, a carrier may submit a trouble report via CEMR that requires Qwest to dispatch a technician. MEDIACC is used to communicate the carrier’s request to Qwest’s back end system(s) (e.g, Work Force

²See Integra Telecom, PAETEC Business Services, and **tw telecom of colorado** v. Qwest Corporation and CenturyLink, CPUC Docket No. 11F-436T (“CO Merger Compliance Docket”), Direct Testimony of Bonnie Johnson, Exhibit BJJ-9 at JC000060, CR Detail, Dec. 17, 2008 at JC000060.

³CO Merger Compliance Docket, Direct Testimony of Bonnie Johnson, Exhibit BJJ-53, Qwest July 1, 2011 Matrix, p. 56 at JC000809.

⁴CO Merger Compliance Docket, Direct Testimony of Bonnie Johnson, Exhibit BJJ-9 at JC000060, CR Detail, Dec. 17, 2008 at JC000060.

Administration, “WFA”) to schedule the technician for dispatch. MEDIACC is also used to communicate back to the carrier via CEMR that Qwest is dispatching the technician, status, *etc.*

Request No. 1-2: How do you communicate repair issues to CenturyLink for legacy Qwest services today?

Objection: The Joint CLECs further object to the request on the ground that it is vague and overly broad. “Communicate” as is vague as used here. Joint CLECs understand the request to be asking how trouble report information is submitted to and received from legacy Qwest.

Response: Subject to, and without waiving, the foregoing objections, Joint CLECs refer to and incorporate their response to Request No. 1-1 above.

Request No. 1-3: If a CEMR user, what impacts to your company do you expect as a result of the MTG conversion?

Objection: The Joint CLECs further object to the request on the ground that it is based on a false factual premise and, therefore, is vague and ambiguous. The term “MTG conversion” is inaccurate. Qwest and CenturyLink have indicated that the company intends to implement MTG in legacy Qwest’s service territory in December 2011.

Response: Subject to, and without waiving, the foregoing objections, the Joint CLECs state as follows:

MTG has been described by Qwest as the replacement system for both MEDIACC and CEMR.⁵ Although the Merged Company has not identified the CEMR retirement date for CLECs, it has specifically said in CMP that there is an end date for the availability of CEMR as it exists today. On July 1, 2011, Qwest said:

⁵ See CO Merger Compliance Docket, Direct Testimony of Bonnie Johnson, Exhibit BJJ-36, Merged Company May 2, 2011 email to Integra (indicating the company needs “to implement a replacement system for CEMR and MEDIACC for operations of Qwest Corporation and intends to move forward with installation and implementation of the MTG system at the same time it continues to use CEMR and MEDIACC.”) at JC000294; Jan. 19, 2011 CMP monthly Qwest CMP meeting (“we are conducting a Preliminary Implementation Plan Review meeting for the MTG project which is the CEMR MEDIACC replacement”). See also WA Merger Compliance Docket, Answer, p. 2 (describing MTG as the “eventual replacement” for MEDIACC).