

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

QWEST COMMUNICATIONS
INTERNATIONAL INC. AND
CENTURYTEL, INC.

For Approval of Indirect Transfer of Control
of Qwest Corporation, Qwest
Communications Company LLC, and Qwest
LD Corp.

DOCKET NO.: UT-100820

**INTEGRA RESPONSE TO
PETITION FOR WAIVER OF
MERGER-RELATED CONDITIONS
REGARDING OSS ISSUES**

Integra Telecom of Washington, Inc., on behalf of itself and its affiliates¹ (“Integra”) respectfully provides these comments in response to CenturyLink’s Petition for Waiver of Merger-Related Conditions Regarding OSS Issues² pursuant to Commission’s *Notice of Opportunity to Respond*.³

Introduction

Integra does not oppose CenturyLink’s one-time request⁴ of the merger related conditions contained in paragraphs 120 and 121 of Order 14 in this docket.⁵ Specifically, Integra does not oppose a waiver of the Commission’s modification to the merger condition regarding the voting process contained in paragraph 120 and the condition regarding the Commission’s right to impose third-party testing for the replacement OSS as contained in paragraph 121.

¹ Integra affiliates operating in Washington are Integra Telecom of Washington, Inc., Electric Lightwave, LLC, Eschelon Telecom of Washington Inc., Advanced TelCom, Inc., Shared Communications Services, Inc., Oregon Telecom Inc., United Communications, Inc., and World Communications, Inc.

² *Petition for Waiver of Merger-Related Conditions Regarding OSS Issues* (“Petition for Waiver”), In the Matter of the Joint Application of Qwest Communications International Inc., and CenturyTel, Inc., for Approval of Indirect Transfer of Control of Qwest Corporation, Qwest Communications Company LLC, and Qwest LD Corp., Docket No. UT-100820, May 7, 2015.

³ *Notice of Opportunity to Respond*, In the Matter of the Joint Application of Qwest Communications International Inc., and CenturyTel, Inc., for Approval of Indirect Transfer of Control of Qwest Corporation, Qwest Communications Company LLC, and Qwest LD Corp., Docket No. UT-100820, June 15, 2015.

⁴ *Petition for Waiver*, ¶ 1. CenturyLink’s request is specific to the OSS changes filed by CenturyLink on April 30, 2015.

⁵ *Order 14, Final Order Approving and Adopting, Subject to Conditions, Multiparty Settlement Agreements and Authorizing Transaction* (“Order 14”), In the Matter of the Joint Application of Qwest Communications International Inc., and CenturyTel, Inc., for Approval of Indirect Transfer of Control of Qwest Corporation, Qwest Communications Company LLC, and Qwest LD Corp., Docket No. UT-100820, March 14, 2011.

Integra initially took no position on CenturyLink's plans to request a waiver of the Commission's conditions contained in paragraphs 120 and 121.⁶ As a result of Integra's review of CenturyLink's *Petition for Waiver*, Integra's active participation in the Change Management Process ("CMP"), the specific OSS being transitioned at this time, and the fact that CenturyLink's request is limited to this particular OSS transition, Integra does not oppose CenturyLink's *Petition for Waiver*.

Review of CenturyLink's Petition for Waiver

CenturyLink plans to convert the Qwest legacy billing system, Integrated Access Billing System ("IABS"), to Carrier Access Billing System ("CABS"), and the ordering system used for Access Service Requests ("ASRs"), CenturyLink Online Request Application ("CORA"), to Electronic Administration and Service order Exchange ("EASE").⁷ Integra expects the transition between these systems to proceed smoothly. Integra has experience in both the current systems and the systems that will replace the current systems. Integra believes that CORA, which is used for ASRs, is similar enough to EASE, the replacement system, that conversions within the CMP timeframes should proceed smoothly.

Change Management Process ("CMP")

Integra is actively participating in CMP with respect to this OSS transition. Integra attends both CMP meetings and the CMP ad hoc meetings, where the OSS transition is on the agenda. In addition, Integra has reviewed and commented on CenturyLink's proposed Consolidation Plan. The Consolidation Plan outlined the replacement of two existing CenturyLink/Qwest systems, CORA and IABS, and compared the functionality of existing CenturyLink/Qwest systems with the successor systems, EASE and CABS. The Consolidation Plan provided the proposed implementation plan and delineated the proposed implementation timeline including the key milestones. CenturyLink released a second version of the Consolidation Plan based on Integra's feedback.⁸

CenturyLink's EASE OSS and ASRs

CenturyLink claims that EASE is a "proven industry standard OSS that is already being used by the companies that operate in CenturyLink's other markets"⁹ and that EASE has proved to be successful.¹⁰ Integra does not necessarily agree with these overly broad statements at this time, but expects EASE to be able to handle ASRs as they are transitioned from CORA, the

⁶ *Petition for Waiver*, ¶ 5.

⁷ *Petition for Waiver*, ¶ 7.

⁸ Version 2 CenturyLink Access Service Ordering and Billing System Consolidation Plan (http://www.centurylink.com/wholesale/downloads/2015/150619/CenturyLinkServiceOrderingandBillingSystemConsolidationPlanV2_061915.doc.)

⁹ *Petition for Waiver*, ¶ 8.

¹⁰ *Petition for Waiver*, ¶ 18.

current system used for ASRs. The EASE and CORA systems are closely aligned with the industry standard Access Service Ordering Guidelines (ASOG) with very little customization or company specific business rules. The ASR systems are relatively straightforward, compared with Local Service Requests (“LSRs”), and Integra believes the functionality of EASE, with respect to ASRs, will be “functionally equivalent”¹¹ to CORA.

The Commission included the conditions contained in paragraphs 120 and 121, in part due to the rigors of OSS testing during the 271 process.¹² Integra notes that most of the orders it places with CenturyLink are Local Service Requests (“LSRs”) as opposed to ASRs. LSRs are used to order most Unbundled Network Elements and the Qwest LSR system was enhanced and customized based on testing and input from CLECs during the 271 process. It is Integra’s belief that the EASE system, as it functions today, would not be able to handle LSRs without significant effort and enhancements.

CenturyLink’s Petition for Waiver is Limited

CenturyLink is not currently transitioning the Qwest system used for LSRs, but instead is transitioning the Qwest ASR OSS to EASE. CenturyLink’s *Petition for Waiver* is specific to the IABS and CORA systems.¹³ As a result, Integra does not oppose a waiver to the Commission’s conditions contained in paragraphs 120 and 121 of Order 14.

Conclusion

Integra appreciates the opportunity to file comments on CenturyLink’s *Petition for Waiver*.

Integra does not oppose CenturyLink’s one-time request of the merger related conditions contained in paragraphs 120 and 121 of Order 14 in this docket.

¹¹ Joint CLEC Settlement Agreement in the CenturyLink-Qwest merger modifies paragraph 12 of the Integra Settlement agreement to requires “functionally equivalent” OSS post merger.

¹² *Order 14*, ¶ 96.

¹³ *Petition for Waiver*, ¶ 1.

RESPECTFULLY SUBMITTED



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Douglas Denney
Vice President, Costs & Policy
Integra
18110 SE 34th St
Building One, Suite 100
Vancouver, WA 98683
dkdenney@integratelecom.com
Direct: 360-558-4318