

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

**AFFIDAVIT OF BONNIE JOHNSON IN
SUPPORT OF THE JOINT CLECS'
MOTION FOR TEMPORARY RELIEF**

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

I, Bonnie Johnson, being duly sworn, states as follows:

1. I am the Director of ILEC Relations at Integra Telecom and submit this affidavit in support of the motion of the Joint CLECs in the above-captioned matter for temporary relief.

2. I am Integra's primary representative in the Qwest Change Management Process (CMP).

3. I participated in CMP when Qwest first submitted a request to implement the new repair system CTG (the name was later changed to MTG) and when Qwest deferred the change request in CMP.

4. I personally attended all of the Qwest CMP meetings, including the CMP monthly meetings and ad-hoc calls related to Qwest's new application to application interface called MTG, which Qwest said will be a replacement for legacy Qwest maintenance and repair OSS.

5. I was either the recipient, copied on, or aware of most, if not all, of the email exchanges between Integra and Qwest CMP, Qwest and CenturyLink legal

personnel, Qwest and CenturyLink's business personnel, including Executives for each company.

6. I am Integra's point of contact for Qwest's service manager.

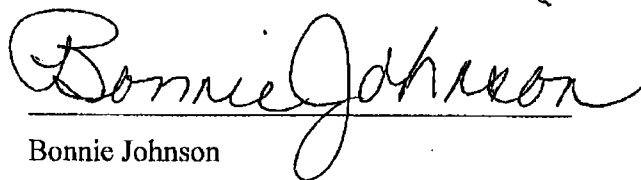
7. Communicating Qwest system/process changes and event notifications Qwest sends to make CLECs aware of system issues is under my direction.

8. Attached to this affidavit as Exhibit 1 is a true and correct copy of excerpts from a matrix containing responses from the Merged Company to questions from Integra regarding the implementation and integration of MTG as an intended replacement for legacy Qwest's maintenance and repair OSS.¹

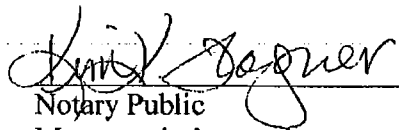
9. By this affidavit, I verify that the factual assertions concerning communications and activities in CMP relating to the implementation and integration of MTG as an intended replacement for legacy Qwest's maintenance and repair OSS, that are contained in the Formal Complaint and Petition of the Joint CLECs in this proceeding are true and correct.

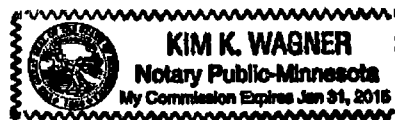
FURTHER AFFIANT SAYETH NOT.

Dated this 10 day of August 2011.


Bonnie Johnson

Subscribed and sworn to before me
this 10th day of August, 2011.


Notary Public
My commission expires: 1/31/2015
GP:3022623 v1



¹ Although the matrix is dated June 30, 2011, it was provided to CLECs via email on July 1, 2011.

Exhibit 1

**QWEST 06-30-11 RESPONSE TO QUESTIONS FROM INTEGRA ON PROPOSAL TO
RETIRE MEDIACC/CEMR AND REPLACE WITH MTG**

NOTE: In addition to the original Integra questions and Qwest responses, this matrix now includes questions/concerns from multiple emails from Integra: May 23, 2011, May 26, 2011, June 1, 2011, June 9, 2011, June 14, 2011 (from Karen Clauson) and June 14, 2011 (from Bonnie Johnson). These additional questions and the Qwest responses have been added to the bottom of the matrix. The June 7, 2011 questions received from Integra have not been included in this matrix as they were specific to QPortal which is no longer included as part of MTG.

CONTENT OF EMAIL RECEIVED FROM INTEGRA ON SYSTEM NOTICE: SYST.MEDI03.10.11.F.08921.RESP_ADDL_COMMENTS_MTG

Enclosed is Integra's reply to Qwest's delayed response dated March 10, 2011. Integra is one of the CLECs that submitted comments in February in CMP. Later, Integra also summarized its questions for Qwest and provided them to Qwest and CenturyLink executives on February 20, 2011. As part of Qwest's March 10, 2011 CMP response, Qwest included Integra's February 20, 2011 questions and Qwest's responses to them. This is Integra's first opportunity, therefore, to review and respond in CMP to Qwest's March 10, 2011 information provided in response to those Integra questions. Please ensure that Integra's enclosed reply is posted to the website in CMP as part of the CR Detail for this CR.

I am also providing Integra's Reply to you, Rita. If there is any comment or question that Qwest believes is outside the scope of CMP, please ensure that the appropriate personnel at Qwest receive and respond to the enclosed document.

1. Retirement at this Time. Why retire CEMR/MEDIACC now (as opposed to after two years, if at all)? We need a detailed understanding of the current systems and Qwest's reasons for proposing replacement.

<p>INTEGRA 2/2/011</p> <p>a. Identify the manufacturers and the vendors that support the operating system, database, software, and hardware; and provide the specification of each that CEMR/MEDIACC is currently residing on. If Qwest is the owner/developer/manufacturer,</p>	<p>QWEST 3/10/11</p> <ul style="list-style-type: none"> • MEDIACC Operating system is HP-UX 10.20, which is not supported by the vendor. • MEDIACC hardware is HPK460 which is supported by the vendor at a best effort level. • The database used by MEDIACC is Sybase 11.5.1, which is not supported by the 	<p>INTEGRA REPLY 3/18/11</p> <p>Regarding Qwest's assertion that certain vendors do not provide support, Integra requested documentation to support Qwest's claim. Qwest did not post a document with some vendor information to its website until March 15 or March 16, 2011. Qwest provided no explanatory</p>	<p>QWEST 6/30/11</p> <p>FROM partial response associated with notification sent on 5/20/11:</p> <p>See Qwest 3/10/11 column for manufacturer and vendor information.</p>
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<p>As stated previously, the MTG project is a proactive effort to develop a replacement system in an effort to prevent problems before they ramp up – given the age of the systems and the advice of our IT team.</p> <p>2. Transition to MTG. We need a detailed understanding of MTG and Qwest's plans to implement it. We need to know specifically what Qwest plans to implement and when, what testing is planned, how functionality will be confirmed by CLECs before implementation, and whether, how, and when CLECs will have a say/vote in accepting the replacement system (MTG) before implementation.</p>			
<p>INTEGRA 2/2/011</p>	<p>QWEST 3/10/11</p>	<p>INTEGRA REPLY 3/18/11</p>	<p>QWEST 6/30/11</p>
<p>a. Qwest indicated in CMP that MTG will be using the existing Qwest system (QPortal). Please confirm if that is correct and, if not, what will be used. If correct, does the existing Qwest system currently reside on a platform with high availability with failover?</p>	<p>Qwest plans to add CEMR functionality to QPortal, an existing platform used by thousands of customers today. The QPortal Platform is hosted on multiple systems that allow automatic failover in the event of a problem, thus ensuring improved system availability in the event of a system failure. As stated above, CEMR/MEDIACC do not have this automatic failover capability and failure results in outages.</p>	<p>Given that Qwest confirms it is using an existing platform to implement the new system (MTG), why hasn't Qwest provided more information in response to CLEC questions? See next Row. Although Qwest says that QPortal has been used by thousands of customers, Qwest admits that QPortal has not been used by customers for the functionality provided to CLECs by CEMR/MEDIACC. See Row 2(b). With respect to outages, Qwest admitted in CMP that there were fewer outages last year than there have been in any other year since 2003.</p>	<p>The QPortal Platform and the CEMR functions that it was to provide is no longer a part of the MTG development project. CEMR will remain in place.</p> <p>Qwest is committed to meeting its service level agreements. Efforts around this commitment resulted in fewer outages. This is not an indication the MEDIACC platform is stable.</p>
<p>b. In CMP, Qwest was unable to answer to certain questions. If an existing Qwest system (QPortal) is used, then Qwest should be very familiar with that system, and information about that system should be readily available. For example, regarding the ability of the new system to run in a high</p>	<p>Qwest will ensure that a QPortal expert is available to respond to CLEC questions at the next CMP meeting, and any other meetings CLEC's request to discuss the functionality of QPortal. If there are specific questions regarding QPortal functionality directed to Qwest in writing, responses will be returned in writing. Availability of QPortal is</p>	<p><i>First bullet:</i> Qwest waited until March 10th to indicate that it will have a QPortal expert at the March 16th CMP meeting. CLECs nonetheless asked questions during the CMP meeting, but Qwest's QPortal experts were unable to answer them. Qwest said that Qwest is not yet prepared to answer any</p>	<p>The QPortal Platform and the CEMR functions that it was to provide is no longer a part of the MTG development project. CEMR will remain in place.</p>

<p>Industry Standard or Specifications it will be using for the Network testing transactions? Per a February 2nd Qwest email, Network Testing Transaction specifications were not yet identified. But, that distinction was no longer made in the slide presentation on Feb 16th, 2011. If available, please provide this information.</p>	<p>Interface for POTS Service Test.</p>	<p>“POTS” test? Qwest considers UNEs to be “design” services, not POTS. Please provide the referenced document (or a URL for the referenced document).</p>	<p>Reference the CMP 5/8/11 documents. While we are using the ATIS specs, detail test design is not complete. Specs will be made available through CMP (these specifications will cover POTS circuit testing only, in keeping with the ATIS specification). Please note that Design Service and POTS circuit testing are available through CEMR.</p>
<p>e. Please clarify the following: If the timeline, as indicated by Qwest, is roughly 9-12 months for a hardware upgrade to the current system and the timeline is roughly 9-12 months for a new application, why did Qwest choose to implement the new system instead of simply upgrading the End of Life hardware, which would allow Qwest to retain the existing system (MEDIACC/CEMR)?</p>	<p>Where the hardware and databases can be upgraded in the interim to reduce risk, it has been, as is demonstrated in the answers above regarding hardware and operating systems. However, the database used by MEDIACC can't run on newer hardware and operating systems, and therefore the application needs to be rewritten to utilize a newer database.</p>	<p>Qwest's response is incomplete. Qwest provides no explanation for its assertion that “the database used by MEDIACC can't run on newer hardware and operating systems.” Why not? Has Qwest, as the developer, failed to maintain or update the database? What database(s) supports CEMR/MEDIACC? What does Qwest mean by “newer database”? Is data from the old system being placed/converted into the new system? If so, how? If not, how is historical information retrieved? Does the “newer database” include both Qwest and CenturyLink data? If Qwest can rewrite the application for its purpose, why can't Qwest</p>	<p>The CEMR application, with no loss of functionality or wholesale performance, will continue to be used for the full time period required by the settlement agreements. (See Merger paragraphs 11 and 12.) 1. Qwest provides no explanation for its assertion that “the database used by MEDIACC can't run on newer hardware and operating systems.” Why not? Response: Running unsupported software on new hardware does not</p>

		<p>rewrite the application for the current database? Qwest mentions only MEDIACC. What about CEMR? Please explain all reasons for the assertions in Qwest's response.</p>	<p>eliminate the risk. Our focus is on eliminating the risk of using unsupported software.</p> <p>2. Has Qwest, as the developer, failed to maintain or update the database?</p> <p>Response: The database has been maintained by Qwest; however, the design decision is to upgrade to industry standard. .</p> <p>3. What database(s) supports CEMR/MEDIACC?</p> <p>Response: CEMR - Oracle 10.2.04 MEDIACC – Sybase 11.5.1</p> <p>4. What does Qwest mean by “newer database”?</p> <p>Response: A vendor supported database engine.</p> <p>5. Is data from the old system being placed/converted into the new system? If so, how?</p>
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<p>changes, including back-end changes, that <u>may</u> affect customers, whether the changes ultimately operationally affect CLECs or not. While you may not expect an adverse impact, things happen. If an unexpected adverse impact occurs, the CLEC is left with an outage or other problem and no explanation or ability to prepare for it. Also, in this case, there is the added issue of whether the Company should be making the changes at all, given the merger conditions and Orders. As we have stated before, it is insufficient to seek forgiveness rather than permission. Although you refer to "open communication," it is not open communication to deliver minimal information after-the-fact, when disclosure and discussion before-the-fact is required.</p> <p>We ask that Qwest/CenturyLink promptly and expressly address not only our pending questions (in the matrix and in the email below, etc.), but also the following questions raised by your email below:</p> <ul style="list-style-type: none"> ■ Please fully describe the changes (which you refer to below as "upgraded" and "upgrades") that were made, including and to what systems/software/hardware, and when they were made (e.g., when is "recently"?). 	<p>requirements of CMP.</p>
<ul style="list-style-type: none"> ■ For those changes/"upgrades," were there at any time any outages and, if so, was there advance notice with reason for the change/cause given? If there were outages, please describe them, including dates, times, length of outages. If there were no outages or downtime, how did you perform hardware upgrades with no downtime? 	<p>Qwest is not required by the CMP to notify CLECs of non CLEC facing system changes.</p> <p>These are key components that were included as part of the CEMR upgrade during 2010 third quarter:</p> <ul style="list-style-type: none"> • Upgrade Web Logic Server - WLS 8.X to TOMCAT (JBoss-EWS) • Upgraded EOSL Servers to Linux Servers • Consolidated Number of Servers from 4 to 2 (Production Servers) • New servers provide production fail over capability. <p>IBM HS21 Blade production servers (two 146 GB Drives) have a great uptime rate – improves reliability</p>
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<p>The CEMR GUI is the system that has been upgraded as noted previously. Qwest is still concerned about the stability of MEDIACC.</p> <p>Qwest does not intend to withdraw the pending SCR121608-02.</p>	<p>Qwest has claimed that the reason for its Change Request to implement MTG was the alleged instability of the existing system. CLECS requested verification of that claim and to date have not received sufficient verifying information to persuade us that this was the case. Qwest admitted in CMP that there were fewer outages last year than there have been in any other year since 2003. Per your email below, you state that the existing system “was recently upgraded to a <u>stable</u> hardware and software platform.” Now that the only reason provided by the Company for replacing or integrating CEMR/MEDIACC (alleged instability) has been addressed, is the Company going to withdraw its pending CR to implement MTG? If not, why not? If the existing system is stable at this time, why do you desire to replace or integrate it before the end of the merger moratorium period?</p>
<p>See prior responses.</p>	<p>Why did the Company make these changes now? Why did the Company choose to not take these steps to make the existing system more stable before? Why did the Company wait until recently to make these “upgrades,” when if there was an instability problem, the Company had these means available to make them stable?</p>
<p>See prior responses.</p>	<p>On February 2, 2011, Integra asked: “Please clarify the following: If the timeline, as indicated by Qwest, is roughly 9-12 months for a hardware upgrade to the current system and the timeline is roughly 9-12 months for a new application, why did Qwest choose to implement the new system instead of simply upgrading the End of Life hardware, which would allow Qwest to retain the existing system (MEDIACC/CEMR)?” Please review Row 2(e) of the Matrix, including Qwest’s response to this question and Integra’s reply. Why were hardware upgrades doable recently but not earlier? Qwest said on 3/10/11 that “the database used by MEDIACC can’t run on newer hardware and operating systems, and</p>

<p>respect to the implementation with MTG as an alternative application are entirely consistent with the merger agreements.</p>	
<p>Qwest continues to plan on first “moving” itself to the MTG system once it has been internally installed and tested. As discussed above, Qwest’s commitments under the merger settlement agreements will be kept with respect to the eventual retirement of MEDIACC. Our actions with respect to the implementation with MTG as an alternative application are entirely consistent with the merger agreements.</p>	<p>■ Is Qwest going to proceed with moving itself or any carrier(s) to MTG, or any other integration with MTG, before the end of the merger’s 30-month moratorium time period? If so, has notice been provided to regulators and, if not, when will it be provided?</p>
<p>Our actions with respect to the implementation with MTG as an alternative application are entirely consistent with the merger agreements.</p>	<p>So that participants have access to the information, I have enclosed a courtesy copy of the recent joint filing of Integra, PAETEC, and tw in Colorado regarding CEMR/MEDIACC/MTG. The Company’s response is due in Colorado in 20 days. Please review the enclosed. We continue to request that the Company comply with the merger conditions and Orders, including with respect to how and when the Company proceeds in CMP.</p> <p>Some of these questions have been pending since at least February or March. Please commit to a date by which Qwest will respond. This date may affect meeting schedules or topics at meetings, if the information is provided insufficiently in advance.</p>