# EXHIBIT BJJ-77 TO THE RESPONSE TESTIMONY OF BONNIE J. JOHNSON ON BEHALF OF INTEGRA TELECOM



**Announcement Date:** 

November 14, 2011

**Effective Date:** 

February 13, 2012

**Notification Number:** 

SYST.CEMR.11.14.11.F.09687.CEMR Rel Feb2012DraftDocs

**Notification Category:** Target Audience:

Systems Notification CLECs. Resellers

Subject:

CMP - Systems Draft Release Notes for CEMR-MTG February

2012 GUI Release

Associated CR # or

System Name and Number: Qwest CR SCR121608-02

On November 14, 2011, CenturyLink will post planned updates to its draft CEMR GUI Release Notes for the February 2012 Release, which is scheduled to deploy on February 13, 2012. These will be posted to the CenturyLink Wholesale Document Review site located at http://www.centurylink.com/wholesale/cmp/review.html.

# **Summary of Change:**

Changes to this application for this release follow the Change Management Process (CMP) at http://www.centurylink.com/wholesale/cmp/index.html.

This release of CEMR is known as CEMR-MTG (Customer Electronic Maintenance & Repair-Maintenance Ticketing Gateway).

CEMR-MTG uses MTG (Maintenance Ticketing Gateway) instead of MEDIACC (Mediated Access).

CEMR windows are changing:

- Circuit History now presents data in columns instead of wrap-around lines of text.
- Trouble History now presents data in columns instead of wrap-around lines of text.

Screen shots are posted at to the CenturyLink Wholesale Document Review site located at http://www.centurylink.com/wholesale/cmp/review.html.

This CEMR release will only impact customers that choose to implement CEMR with an MTG Interface.

The URL for the legacy implementation of CEMR remains unchanged. The URL for CEMR-MTG will be made available at implementation date.

# **Comment Cycle:**

CenturyLink encourages you to review the planned documentation changes and submit questions or comments at any time during the comment cycle as listed in the table below.

To submit questions or comments on these changes, go to the CenturyLink Wholesale CMP Comment Process page at <a href="http://www.centurylink.com/wholesale/cmp/comment.html">http://www.centurylink.com/wholesale/cmp/comment.html</a> and fill in all fields. Or you may submit comments by email to cmpcomm@centurylink.com. Be sure to reference the notification number listed above.

These documents will remain on the CenturyLink Wholesale Document Review site until the end of the comment cycle and will then be moved to the CenturyLink Wholesale Document Archive at http://www.centurylink.com/wholesale/cmp/review archivesystem.html.

#### Timeline:

Draft Release Notes available	CEMR Online Help	November 14, 2011
CLEC Comment Cycle begins	Details for submitting comments are provided above	8:00 a.m. MT, November 14, 2011
CLEC Comment Cycle ends		5:00 p.m. MT, November 17, 2011
Final Release Notes available	Includes CenturyLink response to comments.	November 21, 2011
Targeted Production Date		February 13, 2012 NOTE: There is no implementation in the state of Minnesota.

If you have any other questions, please submit comments at http://www.centurylink.com/wholesale/cmp/comment.html or e-mail at cmpcomm@centurylink.com.

Sincerely,

Qwest Corporation dba CenturyLink QC

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest Corporation SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest Corporation dba CenturyLink QC and the CLEC party to such interconnection agreement.

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If you would like to subscribe, unsubscribe or change your current profile to CenturyLink Wholesale mailouts please go to the 'Subscribe/Unsubscribe' web site and follow the subscription instructions. The site is located at:

http://www.centurylink.com/wholesale/notices/cnla/maillist.html

# **CEMR-MTG February 2012 Draft Release Notes**

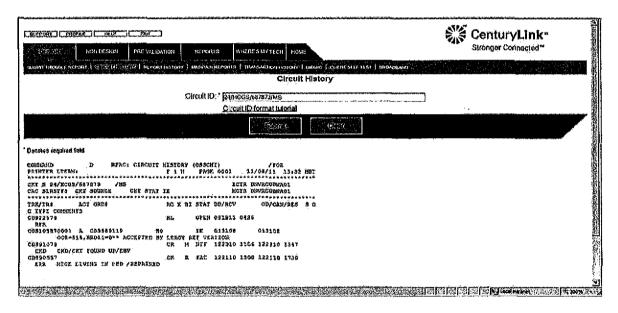
# **CEMR-MTG Windows are Changing**

- Circuit History now presents data in columns instead of wrap-around lines of text.
- · Report History now presents data in columns instead of wrap-around lines of text.

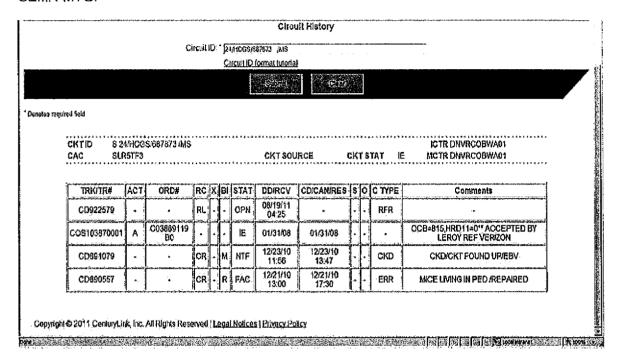
# Circuit History: CEMR (CEMR-MEDIACC) contrasted with CEMR-MTG

Here are examples of the old CEMR, and new CEMR-MTG, Circuit History window. The new Circuit History window organizes the data in columns.

# CEMR:



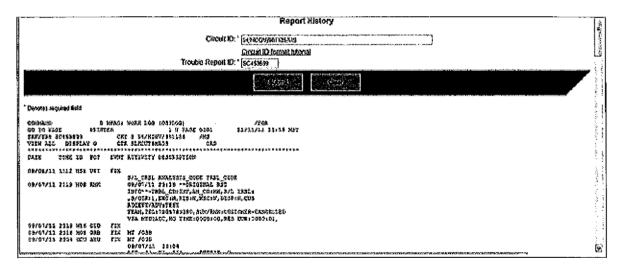
#### CEMR-MTG:



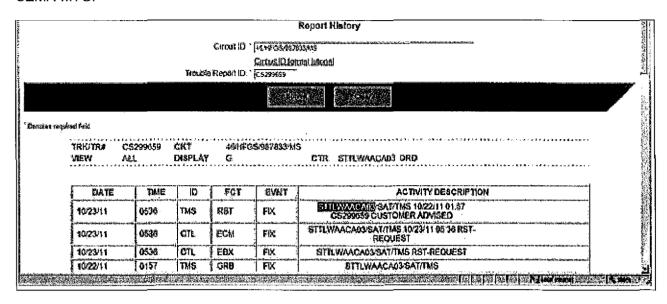
# Report History: CEMR (CEMR-MEDIACC) contrasted with CEMR-MTG

Here are examples of the old CEMR, and new CEMR-MTG, Report History window. The new Report History window organizes the data in columns.

#### CEMR:



#### CEMR-MTG:



November 14, 2011

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Announcement Date:

November 21, 2011

**Effective Date:** 

February 13, 2012

**Notification Number:** 

SYST.CEMR.11.21.11.F.09707.CEMR Feb2012 Fnl RelNotes

**Notification Category:** 

**Systems Notification** 

Target Audience:

CLECs, Resellers

Subject:

CMP - Systems Final Release Notes for CEMR-MTG

February 2012 GUI Release

Associated CR # or System Name and Qwest CR SCR121608-02

Number:

On November 21, 2011, CenturyLink will post updates to the final GUI Release notes for the February 2012 CEMR-MTG Release which is scheduled to deploy on February 13, 2012. These will be posted to the CenturyLink Wholesale Document Review Archive site at <a href="http://www.centurylink.com/wholesale/cmp/review\_archivesystem.html">http://www.centurylink.com/wholesale/cmp/review\_archivesystem.html</a>.

# Summary of Change:

Changes to this application for this release follow the Change Management Process (CMP) at <a href="http://www.centurylink.com/wholesale/cmp/index.html">http://www.centurylink.com/wholesale/cmp/index.html</a>.

This release of CEMR is known as CEMR-MTG (Customer Electronic Maintenance & Repair-Maintenance Ticketing Gateway).

CEMR-MTG uses MTG (Maintenance Ticketing Gateway) instead of MEDIACC (Mediated Access).

#### CEMR windows are changing:

- Circuit History now presents data in columns instead of wrap-around lines of text.
- Trouble History now presents data in columns instead of wrap-around lines of text.

Screen captures are posted at to the CenturyLink Wholesale Document Review site located at <a href="http://www.centurylink.com/wholesale/cmp/review.html">http://www.centurylink.com/wholesale/cmp/review.html</a>.

This CEMR release will only impact customers that choose to implement CEMR with an MTG Interface.

The URL for the legacy implementation of CEMR remains unchanged. The URL for CEMR-MTG will be made available at implementation date.

# Comment Response:

During the review period, CenturyLink received comments on the Draft GUI Release Notes. The CenturyLink Response to comments has been posted to the Document Review Archive site at

http://www.centurylink.com/wholesale/cmp/review\_archivesystem.html associated with System notification number

SYST.CEMR.11.14.11.F.09687.CEMR\_Rel\_Feb2012DraftDocs.

#### Timeline:

Final Release Notes available	Includes CenturyLink response to comments and document listed above.	November 21, 2011
Targeted Production Date		February 13, 2012 NOTE: There is no implementation in the state of Minnesota.

If you have any questions on this subject, please submit them to cmpcomm@centurvlink.com.

Sincerely,

Qwest Corporation dba CenturyLink QC

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest Corporation SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest Corporation dba CenturyLink QC and the CLEC party to such interconnection agreement.

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# CenturyLink Response to Document in Review

Comment Response Date: November 21, 2011

Document Subject: CMP - Systems Draft Release Notes for CEMR-MTG

February 2012 GUI Release

Initial Notification Date November 14, 2011

Initial Notification Number: SYST.CEMR.11.14.11.F.09687.CEMR\_Rel\_Feb2012DraftDocs

CenturyLink recently posted proposed updates to Systems Draft Release Notes for CEMR-MTG February 2012 GUI Release. CLECs were invited to provide comments to these proposed changes during a Document Review period from November 14 through November 17. The information listed below is CenturyLink's Response to CLEC comments provided during the review/comment cycle.

### Resources:

Customer Notice Archive <a href="http://www.centurylink.com/wholesale/notices/cnla/">http://www.centurylink.com/wholesale/notices/cnla/</a>
<a href="http://www.centurylink.com/wholesale/cmp/review.html">http://www.centurylink.com/wholesale/cmp/review.html</a>

If you have any questions on this subject or there are further details required, please contact CenturyLink's Change Management Manager at <a href="mailto:comm@centurylink.com">centurylink.com</a>.

CenturyLink's Response to Comments on **Systems Document in Review - Draft Release Notes** for CEMR-MTG February 2012 GUI Release.

#	CLEC Comment	CenturyLink Response
1	PAETEC	
	November 14, 2011	
	PAETEC has no objections provided the changes in the notice do not impact PAETEC's e-bonded connection, interface or back-office systems and processes. If there is such an impact discovered, whether now or when implemented, then PAETEC reserves the right to object and, based on CMP, stop and/or undo the implementation, as applicable, and revisit through the entire CMP process if CenturyLink should choose to continue pursuit of the CR at that time.	This PAETEC comment has been noted.
2	tw telecom	
	November 16, 2011	·
	Like PAETEC, tw telecom ("tw") has no objections as long as these changes do not negatively impact our existing electronically bonded interface. tw would also reserves the right to object as described by PAETEC.	This tw telecom comment has been noted.
3	Integra	
	November 17, 2011	
	Integra objects to CenturyLink's implementation of	

## # CLEC Comment

MTG before the 30-month time period in paragraph 12 of the Integra merger settlement agreement and without performing the procedures required by the agreement before MTG implementation. As Qwest and CenturyLink know, Integra, PAETEC, and tw telecom have indicated that Qwest's and CenturyLink's conduct violates the merger settlement agreements and orders. Integra's objections are ongoing and are not waived by any commenting or participating in CMP.

In its notice, CenturyLink and Qwest claim that "This CEMR release will only impact customers that choose to implement CEMR with an MTG Interface." Integra objects to this statement as inaccurate and misleading. Qwest and CenturyLink have deprived CLECs of the ability to "choose" to implement CEMR with an MTG interface due to their claims of a potentially catastrophic and disastrous failure of the existing system. It is no choice at all to be confronted with either a disaster or a blatant deprivation of the ability to exercise rights under a recently concluded settlement agreement. A so-called option and commitment to keep MEDIACC in production until the end of the 30-month moratorium is meaningless in this context.

Regarding the two CEMR windows (circuit history and trouble history) that are changing, Integra asks Qwest and CenturyLink to respond to the following questions:

- Was a code change required to allow the system to display the information in the new format depicted in the screenshot?
- Did changes to any Qwest back-end system(s) cause the changes?
- The changes appear to represent a change in how the GUI displays/presents the information in these two screens. For example, a notepad format changed to an XCEL format. Is this an accurate representation of what happened?
- Explain whether this was a change made to CEMR itself, a change to MTG caused the change in CEMR, or whether the change is not related to MTG and in fact the change is related to changes to a back-end system that does not use rely on MTG to access information for CEMR. Are the changes to the CEMR windows are not related to MTG,

# CenturyLink Response

This Integra comment has been noted.

- Yes. CenturyLink removed the screen scraping code and replaced it with service oriented architecture.
- No backend system changes caused the CEMR screen change. This was an architectural requirement while eliminating the CEMR dependency on MEDIACC.
- Yes. The screen is no longer a screen dump, but is now presented in CEMR as structured data (individual fields).
- This was a change made to CEMR itself. This is one of the technology improvements being made by implementing CEMR-MTG.

Screen scraping was part of MEDIACC to CEMR interface. CEMR-MTG does not

#	CLEC Comment	CenturyLink Response
:	could these changes have been made with a separate CR(s)? If none of these, please explain the cause of the changes. (If CEMR is not being retired and replaced, why are there any changes to CEMR at all?)	have MEDIACC screen scraping therefore this new structured data (individual fields) was implemented as current technology.
	Also, is Qwest making (or has Qwest made) any change to Qwest back-end system(s)? If so, please identify the change(s) and system(s).	No. Please see above.
	Qwest and CenturyLink have indicated that, despite CLEC objections, they will proceed with two phases (improper implementation of MTG now, without following the merger steps, and later implementation of MTG following some or all of the merger steps). Integra reserves its rights to comment on all aspects of MTG, including those upon which Qwest and CenturyLink are seeking comments at this time, in the future and without loss of any right. If changes are required later, Integra expects Qwest and CenturyLink to bear any associated costs.	
4	PAETEC	
İ	November 17, 2011	
	PAETEC agrees with and reiterates Integra's response below in addition to our comment previously submitted this week.	This PAETEC comment has been noted.
	PAETEC reserves its rights to comment on all aspects of MTG, including those upon which Qwest and CenturyLink are seeking comments at this time, in the future and without loss of any right. If changes are required later, PAETEC expects Qwest and CenturyLink to bear any associated cost and associated burdens.	
	[PAETEC reiterated the comments of Integra (see #3 above).]	
5	tw telecom November 18, 2011	NOTE: This comment was received outside of the formal comment period.
	tw telecom files this email in support of both PAETEC's and Integra's comments below, in addition to our previously filed comment.	This tw telecom comment has been noted.
	[tw telecom reiterated the comments of PAETEC (see #4 above), and Integra (see #3 above).]	



**Announcement Date:** 

November 23, 2011

**Effective Date:** 

February 13, 2012

**Notification Number:** 

SYST.MEDI.11.23.11.F.09720.MTG\_R1\_FinalNoticeREVISED

**Notification Category:** 

**Systems Notification** 

Target Audience:

CLECs, Resellers, IXC, Wireless

Subject:

CMP - Maintenance Ticketing Gateway (MTG) 1.0 - Final Notice REVISED - Technical Specifications and CenturyLink

**Response to Comments** 

Associated CR # or System

MTG Release 1.0 CenturyLink CR# SCR121608-02

Name and Number:

NOTE: CenturyLink is sending a revised final notice for MTG to notify customers of an update to the planned Release Production Effective Date. The planned Release Production Effective Date is now **February 13, 2012.** The change in the Release Production Date was also relayed in the November CMP Monthly Systems meeting held on November 16, 2011. In addition, a NOTE has been added in the Timeline below which states: **No implementation in the state of Minnesota.** 

The remainder of the information in this notification remains the same as what was included in System notice: **SYST.MEDI.09.02.11.F.09452.MTG1.0\_FinalTechSpecs** sent on September 2, 2011.

\*

On September 2, 2011, CenturyLink will post planned updates to its Final Technical Specifications for MTG Release 1.0 targeted for implementation on December 12, 2011. These will be posted to the CenturyLink Wholesale Document Review Archive site at <a href="http://www.centurylink.com/wholesale/cmp/review">http://www.centurylink.com/wholesale/cmp/review</a> archivesystem.html.

#### Summary of Change:

The summary of changes is included in the Final Technical Specifications.

Changes to this application for this release follow the Change Management Process (CMP) at <a href="http://www.centurylink.com/wholesale/cmp/index.html">http://www.centurylink.com/wholesale/cmp/index.html</a>.

Further information about the Change Request identified above is available on the Wholesale Web site at <a href="http://www.centurylink.com/wholesale/cmp/changerequest.html">http://www.centurylink.com/wholesale/cmp/changerequest.html</a>.

# Walkthrough: Agenda, Attachments and Minutes:

On August 24, 2011, CenturyLink conducted its formal CLEC Walkthrough (announced as part of notification number SYST.MEDI.08.05.11.F.09382.MTG1.0\_Drft\_Tech\_Specs). CenturyLink has posted the release overview and meeting minutes from the Walkthrough session on the Wholesale Calendar at the following URL: <a href="http://wholesalecalendar.CenturyLinkapps.com/">http://wholesalecalendar.CenturyLinkapps.com/</a>. In addition, a preliminary review of the MTG 1.0 Technical Specifications was held on August 17,

2011 following the Monthly CMP meeting. Those meeting minutes are also posted to the Wholesale calendar associated with that date.

# **Comment Response:**

The CenturyLink Response to comments received on the Draft Technical Specifications during the review period has been posted to the Document Review Archive site at <a href="http://www.centurylink.com/wholesale/cmp/review">http://www.centurylink.com/wholesale/cmp/review</a> archivesystem.html associated with System notification number SYST.MEDI.08.05.11.F.09382.MTG1.0 Drft Tech Specs.

#### Timeline:

Final Technical Specifications Issued	Includes response to CLEC comments.	September 2, 2011
Testing Window Begins	Testing Available If you are interested in using this environment for testing, please contact Carrie Bousfield at Carrie.Bousfield@centurylink.com	November 5, 2011
REVISED Targeted Production Date		REVISED February 13, 2012 NOTE: No implementation in the state of Minnesota.

If you have any questions on this subject, please submit them to <a href="mailto:cmm@centurylink.com">cmpcomm@centurylink.com</a>. Sincerely,

Qwest Corporation dba CenturyLink QC

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