

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of a Complaint by the Joint     )  
CLECs against the Joint Applicants     )     UT-111254  
Regarding OSS for Maintenance and     )  
Repair     )

**RESPONSIVE TESTIMONY OF**

**BONNIE J. JOHNSON**

**ON BEHALF OF**

**INTEGRA TELECOM**

**December 15, 2011**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Bonnie Johnson and my business address is 6160 Golden Hills Drive,  
4 Golden Valley, MN 55416.

5 **Q. DID YOU FILE DIRECT TESTIMONY IN THIS DOCKET ON OCTOBER**  
6 **14, 2011?**

7 A. Yes. I filed direct testimony, including Exhibits BJJ-1 through BJJ-71.

8 **Q. ON WHOSE BEHALF WAS THIS TESTIMONY PREPARED?**

9 A. This testimony was prepared on behalf of Integra.

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11 A. I describe my exhibits, and in doing so, I discuss Qwest's history regarding  
12 certain Change Requests ("CRs") in the Change Management Process ("CMP").  
13 The purpose of my testimony is also to provide factual documentation and  
14 background relating to the issues raised in Joint CLECs' complaint and discussed  
15 further by Douglas Denney in his testimony. As was the case with my direct  
16 testimony, the factual information I provide is intended to assist the  
17 Administrative Law Judge and Commission in determining whether the Merged  
18 Company is in breach of its merger commitments relating to OSS as well as

1 obligations arising under interconnection agreements and state and federal law  
2 and, if so, in crafting an appropriate remedy.

3 **II. EXHIBITS**

4 **Q. PLEASE IDENTIFY THE EXHIBITS TO YOUR TESTIMONY.**

5 A. As part of my testimony, I have included the following exhibits, each of which is  
6 described in more detail below and many of which were also provided earlier to  
7 the Merged Company and staff.<sup>1</sup> Many of the documents, when provided to the  
8 Merged Company and staff, were stamped with document numbers. I provide a  
9 reference to the document stamp numbers when applicable (and those numbers  
10 are also often provided in citations in Mr. Denney's testimony for ease of  
11 reference):

- |    |   |                |   |
|----|---|----------------|---|
| 12 | i | Exhibit BJJ-2A | Updated Repair OSS Chronology   |
| 13 | i | Exhibit BJJ-8B | “Updated Introduction of MTG CR Detail”: Revised Qwest<br>14 initiated CMP Change Request ("CR") Detail for CR #<br>15 SCR121608-02 in its entirety, which includes updated<br>16 meeting minutes posted to the CR. |
| 17 | i | Exhibit BJJ-72 | CMP change request SCR042605-01 initiated by Qwest in<br>18 April of 2005 to migrate IMA EDI to IMA XML. Qwest<br>19 later withdrew this CR [JC001131-JC001132]   |
| 20 | i | Exhibit BJJ-73 | CMP change request SCR062107-1EX initiated by<br>21 Comcast requesting an extension of the IMA 19.0 sunset<br>22 date to allow more time to implement XML [JC001133-<br>23 JC001134]                                |
| 24 | i | Exhibit BJJ-74 | Excerpts from the governing Change Management Process<br>25 Document  |

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<sup>1</sup> See discussion of the chronology and documents produced (Document Numbers JC000001-JC000750) on page 2 of Joint CLECs' Complaint filed in this matter on July 11, 2011.

- 1 i Exhibit BJJ-75 September 22, 2011 email from CenturyLink counsel to  
2 Integra counsel regarding the designation of a response to  
3 an information request [JC001138]
- 4 i Exhibit BJJ-76 Excerpts from the February 8, 2011 Minnesota PUC  
5 hearing transcript in Minnesota regarding Docket Nos. P-  
6 421, et al./PA-10-456
- 7 i Exhibit BJJ-77 Merged Company November 14, 2011 notification  
8 providing the CEMR/MTG release notes and screen shots  
9 for comment, November 21, 2011 notification providing a  
10 response to CLEC comments, and November 23, 2011  
11 notification announcing the MTG implementation date is  
12 changing to February 13, 2011 [JC001161-JC001174]

13

14 **Q. HOW ARE YOU FAMILIAR WITH THE EXHIBITS TO YOUR**  
15 **TESTIMONY?**

16 A. With respect to Exhibit BJJ-75 as well as the email exchanges described or  
17 included in the chronology (Exhibit BJJ-2A), I was personally involved and in  
18 many cases copied on these emails. These Exhibits are true and correct copies of  
19 those emails.

20 The documents contained in Exhibit BJJ-8B, Exhibit BJJ-72, Exhibit BJJ-73,  
21 Exhibit BJJ-74 and BJJ-77 are true and correct copies of documents or excerpts  
22 from documents that were prepared by Qwest and posted on Qwest's web site.

23 The excerpts in Exhibit BJJ-76 are from the February 8, 2011 Minnesota PUC  
24 hearing in Minnesota regarding Docket Nos. P-421, et al./PA-10-456 and were  
25 made available to the parties. They are true and correct copies.

1 The Chronology in Exhibit BJJ-2A, was prepared by me or prepared under my  
2 direction, or prepared with my knowledge. The information contained in this  
3 Exhibit is true and correct to the best of my knowledge.

4 **Q. MR. DENNEY REFERS IN HIS TESTIMONY TO YOUR TESTIMONY**  
5 **INCLUDING ITS EXHIBITS. HAVE YOU REVIEWED THAT**  
6 **TESTIMONY, AND IF SO, DID MR. DENNEY TAKE ANY STATEMENT**  
7 **OR EVENT OUT OF CONTEXT?**

8 A. I have reviewed that testimony and, no, Mr. Denney did not take any statement or  
9 event out of context.

10 **Q. PLEASE DESCRIBE THE UPDATED OSS CHRONOLOGY IN EXHIBIT**  
11 **BJJ-2A.**

12 A. Exhibit BJJ-2A is an updated version of Exhibit BJJ-2. The chronology has been  
13 updated to include events that have taken place since I filed my direct testimony  
14 on October 14, 2011.

15 **Q. PLEASE DESCRIBE EXHIBIT BJJ-8B, WHICH IS UPDATED DETAIL**  
16 **FOR CR # SCR121608-02.**

17 A. As I discussed in my direct testimony, because the "CR Detail" for change  
18 requests in CMP is maintained and updated over time as additional events occur,  
19 the documents in Exhibit BJJ-7, BJJ-8, and BJJ-8A do not contain events that

1 occurred more recently (since filing of my direct testimony). Therefore, Exhibit  
2 BJJ-8B has been added to provide more recent information. Exhibit BJJ-8B is a  
3 new exhibit with the complete and up-to-date CR detail in one document  
4 including status updates and the meeting minutes from the September,<sup>2</sup> October  
5 and November monthly CMP meetings.

6  
7 **Q. MS. ALBERSHEIM TESTIFIED THAT QWEST “SUBMITTED” A**  
8 **CHANGE REQUEST TO CMP IN NOVEMBER 2010.<sup>3</sup> WAS THE**  
9 **CHANGE REQUEST FIRST SUBMITTED IN NOVEMBER 2010?**

10 A. No. As described in Integra’s direct testimony,<sup>4</sup> in December of 2008, Qwest  
11 initiated two change requests in CMP to implement a new repair system (referred  
12 to as Common Ticketing Gateway, or CTG) and retire and replace MEDIACC.<sup>5</sup>  
13 A few months later, Qwest sent a notice to CLECs stating that development and  
14 implementation of CTG “has been *indefinitely* placed on HOLD.”<sup>6</sup> In Qwest and  
15 CenturyLink’s Answer, they suggested that CLECs were on notice of the Merged  
16 Company’s later conduct due to these deferred change requests.<sup>7</sup> Mr. Denney

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<sup>2</sup> Exhibit BJJ-8A contained draft meeting minutes from the September monthly CMP meeting, and Exhibit BJJ-8B contains the final meeting minutes.

<sup>3</sup> Albersheim Direct Testimony, WA Docket No. UT-111254, Oct. 14, 2011, p. 5, lines 12-13. But see *id.* p. 17, lines 1-2 (introduced in 2008).

<sup>4</sup> Johnson Direct, WA Docket UT-111254, Oct. 14, 2011, pp. 77-78; *see also*, Johnson Direct, CO Docket No. 11F-436T, Aug. 12, 2011, pp. 70-71; Denney Direct, WA Docket UT-111254, Oct. 14, 2011, pp. 57-60; *see also*, Denney Direct, CO Docket No. 11F-436T, Aug. 12, 2011, pp. 52-55.

<sup>5</sup> See Exhibit BJJ-7 at JC000043-JC000058 & Exhibit BJJ-9 at JC000059-JC000061.

<sup>6</sup> Exhibit BJJ- 59, Qwest Notification Number SYST.04.07.09.F.06245.CTG\_NewApp\_On\_Hold (emphasis added), at JC000931-JC000932.

<sup>7</sup> In response to the allegation of Joint CLECs at paragraph 25 of their Amended Complaint that Qwest and CenturyLink did not provide any indication to Integra or the Commission regarding any intent to make this

1 discussed the reasons why this suggestion is not reasonable on pages 57-60 of his  
2 direct testimony. Since then, the Merged Company has nonetheless argued that,  
3 “By deferring the change request rather than withdrawing it, Legacy Qwest  
4 informed the CLECs at the CMP that it had every intention of restarting the  
5 change request in the future.”<sup>8</sup> This is not the case, as discussed by Mr. Denney  
6 in his responsive testimony. The Merged Company’s argument is inconsistent  
7 with Qwest’s track record over time with respect to deferred change requests, as I  
8 discuss in my next response.

9 **Q. IS IT QWEST’S PRACTICE TO REACTIVATE SYSTEMS CHANGE**  
10 **REQUESTS, WHICH QWEST HAD ONCE PLACED IN A DEFERRED**  
11 **STATUS, TO IMPLEMENT THOSE CHANGES?**

12 A. No. Integra reviewed the 254 Qwest systems change requests (CRs) that are in a  
13 closed and completed status<sup>9</sup> on the Qwest/CenturyLink CMP systems archived  
14 website.<sup>10</sup> Of the 254 Qwest Corporation system CRs that are in a completed  
15 status, not one of those CRs was first deferred and then reactivated and  
16 completed.

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change or otherwise implement a new system in 2011, Joint Applicants said: “Qwest/CenturyLink first notified Joint CLECs of plans – later withdrawn – to retire MEDIACC and replace it with MTG in 2008.” WA Answer, p. 8 ¶31; *see also*, CO Answer, p. 6, ¶25.

<sup>8</sup> Qwest/CenturyLink Report on MEDIACC Risks, Minnesota PUC Docket Nos. P-421, et al./PA-10-456 & P-5340, et al./C-11-684, Oct. 6, 2011 [“Merged Company MN Compliance Filing”], p. 8.

<sup>9</sup> Qwest uses closed and completed interchangeably; both statuses mean the CR was worked and completed.

<sup>10</sup> The archived system CRs can be found at

[http://www.centurylink.com/wholesale/cmp/archive/crstatus\\_system\\_index.html](http://www.centurylink.com/wholesale/cmp/archive/crstatus_system_index.html).

1 Integra also reviewed the 86 Qwest system CRs that are currently in a withdrawn  
2 status on the CMP systems archived website.<sup>11</sup> There are at least 4 CRs that  
3 Qwest withdrew after it had first placed them in a deferred status.<sup>12</sup> In other  
4 words, Qwest never reactivated these CRs. Their status of deferral did *not* inform  
5 CLECs in CMP that Qwest “had every intention of restarting the change request  
6 in the future.”<sup>13</sup> To the contrary, their status of deferral indicated to CLECs that  
7 Qwest may withdraw its requests for these changes and never complete the work,  
8 as in fact happened in these cases.

9 Given past experience as reflected in CMP data over time, CLECs would more  
10 likely expect that the Merged Company would withdraw or simply never  
11 complete the deferred CR, not reactivate it.

12 **Q. DOES QWEST CURRENTLY HAVE ANY CMP CHANGE REQUESTS IN**  
13 **A DEFERRED STATUS?**

14 A. Yes. They are product/process CRs (*i.e.*, not system CRs). Qwest currently has  
15 six product/process CRs in a deferred status.<sup>14</sup> One of the CRs has been in a  
16 deferred status since 2004, one since early 2008, one since early 2009 and three  
17 since 2010. Therefore, some of these CRs have been in a deferred status in CMP

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<sup>11</sup> The archived system CRs can be found at  
[http://www.centurylink.com/wholesale/cmp/archive/crstatus\\_system\\_index.html](http://www.centurylink.com/wholesale/cmp/archive/crstatus_system_index.html).

<sup>12</sup> See SCR030204-01, SCR021809-1, SCR121608-01, and SCR083005-01 at  
[http://www.centurylink.com/wholesale/cmp/archive/crstatus\\_system\\_index.html](http://www.centurylink.com/wholesale/cmp/archive/crstatus_system_index.html).

<sup>13</sup> Merged Company MN Compliance Filing, p. 8.

<sup>14</sup> See PC050503-2, PC082007-1, PC090208-1CM, PC121109-1, PC020210-1 and PC090110-1 at  
[http://www.centurylink.com/wholesale/cmp/cr/crstatus\\_prod\\_proc\\_index.html](http://www.centurylink.com/wholesale/cmp/cr/crstatus_prod_proc_index.html).



1 longer than the repair OSS CRs that are the subject of this matter (which were  
2 placed in deferral status in April of 2009).

3 **Q. PLEASE DESCRIBE EXHIBIT BJJ-72, REGARDING CHANGE**  
4 **REQUEST SCR042605-01.**

5 A. Exhibit BJJ-72 is the “CR Detail” for a CMP change request relating to ordering  
6 (*i.e.*, not repair). Specifically, it relates to Qwest’s ordering interface, known as  
7 Interconnect Mediated Access (“IMA”), and moving from an Electronic Data  
8 Interface (“EDI”) to Extensible Mark-up Language (“XML”) for ordering/IMA  
9 purposes. I discussed the move from EDI (*i.e.*, not CMIP) to XML for ordering  
10 purposes on pages 67-71 of my direct testimony, when discussing the Merged  
11 Company’s erroneous assertion that “fundamentally the development of MTG is  
12 no different than other systems updates implemented through CMP over the  
13 years.”<sup>15</sup> Ms. Albersheim does not discuss or dispute that testimony in her  
14 Direct Testimony.

15 Ms. Albersheim discusses the move from EDI to XML for ordering (which is the  
16 subject of Exhibit BJJ-72) on pages 10-11 of her Direct Testimony though, as I  
17 discuss in my next response, she omits discussion of Change Request  
18 SCR042605-01. The detail omitted by Ms. Albersheim in her discussion on pages  
19 10-11 as to the history of these change requests sheds light on her apparent

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<sup>15</sup> WA Preliminary Injunction Response, Dt. No. UT-111254, (Aug. 18, 2011), p. 15; *see also*, CO Preliminary Injunction Response, Dkt. No. 11F-436T (Aug. 2, 2011), p. 13.

1 suggestion that CLECs were unconcerned about the move because ultimately,  
2 after all of that history had occurred, CLECs “approved” retirement of the  
3 existing interfaces.<sup>16</sup>

4 **Q. DID CLECS SUBMIT CHANGE REQUESTS SCR042605-01 (EXHIBIT**  
5 **BJJ-72) OR SCR121305-01 (EXHIBIT RA-10) TO CMP TO REQUEST A**  
6 **MOVE TO XML FOR ORDERING?**

7 A. No. Qwest initiated and submitted the system change request reflected in Exhibit  
8 BJJ-72 in April of 2005, and later withdrew it.<sup>17</sup> There were two change requests,  
9 and both were initiated by Qwest. Neither was initiated by any CLEC. Exhibit  
10 BJJ-72 was Qwest’s *initial* CR to migrate IMA to an XML interface. As part of  
11 her Direct Testimony, Ms. Albersheim included the later CR that Qwest then  
12 initiated in December of 2005 and completed in October of 2006 (SCR121305-  
13 01).<sup>18</sup> Ms. Albersheim omitted from her exhibits Qwest’s initial CR.

14 When Qwest initiated the first CR (Exhibit BJJ-72), at least two companies  
15 (AT&T<sup>19</sup> and MCI<sup>20</sup>) opposed implementation of XML for IMA. At that time,

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<sup>16</sup> Albersheim Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011); *see also*, Albersheim Answer Testimony., CO Docket No. 11F-436T, Sep. 15, 2011, p. 11, lines 4-8.

<sup>17</sup> Qwest’s application of a “Closed” status was in error. Qwest corrected the status of SCR042605-01 to “Withdrawn” during a 4/15/2009 review of Change Request statuses. See Status History, Exhibit BJJ-72 at JC001131.

<sup>18</sup> See RA-10, pp. 4-20 (pages not numbered).

<sup>19</sup> “Sharon Van Meter- AT&T asked if the vote would be unanimous and said that AT&T would vote no due to their costs.” Exhibit BJJ-72 at JC001131.

<sup>20</sup> “John / MCI said that MCI has spent a huge amount of money implementing EDI and internal formatting and he expressed concern that this would be like starting over. He stated that they are not prepared to spend

1 the opposition of some customers to the implementation of XML appeared to  
2 have been taken into account by Qwest, even though Qwest said there was  
3 majority company support for a move to XML.<sup>21</sup> Qwest did not move forward  
4 with development and implementation of XML for ordering at that time.

5 There was no applicable merger settlement agreement at that time preventing  
6 Qwest from providing IMA-XML as an optional alternative. Qwest indicated,  
7 however, that the conversion to XML for ordering would have to be all or nothing  
8 because it is too costly to offer two systems.<sup>22</sup> In contrast, today, the Merged  
9 Company is claiming that, because different customers desire different systems, it  
10 will offer two systems (MEDIACC and MTG) as optional alternatives.<sup>23</sup> This is  
11 true even though Qwest was not claiming in 2005 that EDI was at risk of an  
12 unrecoverable failure, so two systems could truly have been offered, if meeting  
13 the requests of customers was the company's objective. Today, the Merged  
14 Company is claiming that MEDIACC is at an increasing risk of an unrecoverable  
15 failure,<sup>24</sup> so the Merged Company cannot be counted upon to offer two systems at

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the dollars associated with implementing XML.” See May 2005 CMP System Distribution Package, p.96 at [http://www.centurylink.com/wholesale/downloads/2005/050513/May\\_Sys\\_Dist\\_Pkg.pdf](http://www.centurylink.com/wholesale/downloads/2005/050513/May_Sys_Dist_Pkg.pdf)

<sup>21</sup> See 5/18/05 monthly CMP Systems meeting minutes, Exhibit BJJ-72 at 1131 (“Connie Winston Qwest said that an adhoc meeting was scheduled to discuss this action item and was well attended. She said that *most* companies were very supportive of our approach and understands the benefits of XML”) (emphasis added).

<sup>22</sup> May, 18, 2005 systems CMP meeting minutes at JC001131.

<sup>23</sup> Albersheim Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011), p. 8, lines 15-20 & p. 10, lines 13-14; *see also*, Albersheim Answer Testimony, CO Docket No. 11F-436T (Sept. 15, 2011), p. 8, lines 15-20 & p. 10, lines 13-14; p. 15, lines 6-7; Hunsucker Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011), pp. 607; p. 9, lines 8-9; pp. 9-10, lines 1-4; *see also*, Hunsucker Answer Testimony, CO Docket No. 11F-436T (Sept. 15, 2011), pp. 7-8; p. 10, lines 1-2; p. 10, lines 14-18.

<sup>24</sup> Albersheim Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011), p. 16, lines 5-8; *see*

1 the necessary service quality levels for the required minimum 30-month time  
2 period.

3 **Q. DID QWEST COMPLETE ITS SECOND CHANGE REQUEST AND**  
4 **MOVE TO XML FOR ORDERING BECAUSE CLECS CHANGED THEIR**  
5 **POSITION ABOUT MOVING TO XML?**

6 A. No. Qwest moved forward with implementing IMA-XML after it submitted its  
7 second CR, in December of 2005, even though there were still customers that  
8 opposed the change. For example, the monthly CMP systems meeting minutes  
9 for the second CR (SCR121305-01) reflect the following customer opposition:

10 “Sharon Van Meter/AT&T stated that she needed to take this back  
11 internally and said that she thought that Qwest knew that AT&T was  
12 pretty adamant that they do not want to convert to XML.”<sup>25</sup>

13 “Sharon Van Meter/AT&T asked if AT&T decided that they don’t want to  
14 convert to XML *would there be a vote. Connie Winston/Qwest said*  
15 *no.*”<sup>26</sup> (emphasis added)

16 “Sharon Van Meter - AT&T said that we voted 6 months ago on who was  
17 interested in XML and AT&T said that they were not interested. Sharon  
18 asked why Qwest was still going forward when they said no several  
19 months ago.”<sup>27</sup>

20 “Sharon Van Meter - Qwest asked if Qwest could delay XML until 2007.  
21 She said that AT&T has already budgeted for 2006 and XML is not  
22 included in their budget.”<sup>28</sup>

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*also*, Albersheim Answer Testimony, CO Docket No. 11F-436T (Sept. 15, 2011), p. 10, lines 14-17.

<sup>25</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 19.

<sup>26</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 19.

<sup>27</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 14.

<sup>28</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 14.

1 “Sharon Van Meter/AT&T said that there is a sense of urgency for these  
2 meetings because AT&T does not want to convert to XML.”<sup>29</sup>

3 “Rosalin Davis/MCI stated that MCI does not want to convert to XML  
4 either and that they would also like a meeting.”<sup>30</sup>

5 “Lynn Kellas/ELI stated that this appears as a slam dunk. She said that  
6 Qwest forced them to do EDI and now Qwest is requiring this move to  
7 XML.”<sup>31</sup>

8 “Lynn Kellas/ELI asked if Qwest will reimburse costs. *Connie*  
9 *Winston/Qwest said no* and that we will schedule an adhoc meeting.”<sup>32</sup>  
10 (emphasis added)

11 “Dianne Friend/Time Warner said that they are dependent on their  
12 software vendor and it is not done in house. Dianne said that she  
13 understands that XML is the way the Industry is headed but that Qwest is  
14 the only ILEC that requires an interactive agent be used. She said that  
15 from ELIs perspective the concern is the costs that have been incurred to  
16 do business with Qwest.”<sup>33</sup>

17 “Frank - AT&T said that by moving to XML, the CLECs have to re-  
18 architect their systems.”<sup>34</sup>

19 “Frank - AT&T said that the conversion to XML is an additional cost and  
20 said that all others are using NDM or Direct Connect.”<sup>35</sup>

21 Despite these specific objections, Qwest and CenturyLink recently described this  
22 issue as follows: “Change request SCR042605-01 was withdrawn. Though  
23 CLECs were enthusiastic, about moving to XML, some CLECs were concerned  
24 with LSOG versioning and wanted to be sure XML would use the most current

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<sup>29</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 19.

<sup>30</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 19.

<sup>31</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, pp. 19-20.

<sup>32</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 20.

<sup>33</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 20.

<sup>34</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 18.

<sup>35</sup> December 14, 2005 CMP Systems meeting minutes, Exhibit RA-10, p. 18.

1 version.”<sup>36</sup> As the above-quoted objections show, the concerns were not limited  
2 to “LSOG versioning.”

3 The change to XML for ordering was implemented in October of 2006, and the  
4 first CLEC (Eschelon) did not move to XML until April of 2007, approximately  
5 six months later.

6 In 2005, Qwest did not implement IMA-XML even though some customers  
7 wanted it. In 2006, Qwest implemented IMA-XML even though some customers  
8 did not want it. As discussed by Mr. Denney, customer requests do not appear to  
9 be the determining factor in Qwest’s XML decisions.

10 **Q. YOU MENTIONED THAT ESCHELON (NOW AN INTEGRA ENTITY)**  
11 **MOVED TO XML FOR ORDERING. WHAT WAS INVOLVED?**

12 A. Converting to an XML interface requires a significant amount of development  
13 and testing. This is true regardless of whether you are changing from EDI to  
14 XML or CMIP to XML.

15 For example, Eschelon conducted at least the following tests during the EDI to  
16 XML Ordering OSS transition with Qwest:

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<sup>36</sup> Exhibit DD-1, Qwest/CenturyLink, Inc. October 24, 2011 Response to Staff’s First Set of Data Requests, Response No. 2d, p. 6, CO Docket No. 11F-436T (Respondents: Legal, Cecilia Tank, and Renee Albersheim).

- 1 i Software testing. This included testing the vendor software to insure general  
2 usage (logging in, set up, configuration, etc.) and the ability to connect to the  
3 new software with existing systems.
- 4 i Connectivity testing. This included general transactions sent to Qwest to  
5 verify connectivity between CLEC systems and Qwest systems. This was  
6 especially important as we were moving from an interactive agent with direct  
7 T1 connectivity to Internet connectivity. Also we were using new digital  
8 certificates.
- 9 i Implementation testing. This included testing all order types for all products  
10 being turned up on the XML platform.
- 11 i Bug fix testing. This included re-testing scenarios that were found to have  
12 deficiencies on either side.
- 13 i Internal connectivity testing. This included testing all internal systems could  
14 pass information to the new gateway through to Qwest and receive the  
15 responses all the way back.
- 16 i Response mapping testing. This included testing ancillary processes that read  
17 and update information based on the various responses sent back by Qwest.
- 18 i Mapping testing. This includes running various scenarios and one offs to  
19 make sure all components are mapping correctly.
- 20 i Production Connectivity Testing. This includes sending general transactions  
21 to test the connectivity between CLEC systems and Qwest Systems in the  
22 production environment. This includes testing digital certificates.
- 23 i Controlled Production testing. This includes sending a limited number of  
24 orders in the production environment to verify all testing was compatible with  
25 the production environment.
- 26 i Production parallel testing. Eschelon ran the EDI production gateway and the  
27 XML gateway in unison in the production environment for approximately 2  
28 months.

29 During the course of testing, as issues arose, Eschelon submitted questions to  
30 Qwest CMP. Questions were not limited to companies engaged in testing. Other  
31 companies with questions also had the opportunity to submit questions to Qwest  
32 CMP. For the various versions of IMA-XML, Qwest has maintained questions  
33 and answers in a common document, or issues log, with only limited information

1 being designated as proprietary for a particular carrier.<sup>37</sup> The log identifies the  
2 source of the question as the reporting CLEC, a service bureau, or a software  
3 vendor. The common issues log is posted on the Qwest website, so any company  
4 may access the information.<sup>38</sup>

5 This shows just some of the work involved in this type of OSS transition.  
6 Dedicating the resources and expense required to change to an XML interface is a  
7 major commitment.

8 **Q. ONCE QWEST IMPLMENTED XML, MS. ALBERSHEIM TESTIFIES**  
9 **THAT CLECS “APPROVED” THE RETIREMENT OF IMA-EDI THAT**  
10 **REPLACED IMA-XML.<sup>39</sup> IS RETIREMENT OF THE REPLACEMENT**  
11 **INTERFACE THE POINT AT WHICH OBJECTIONS ARE MOST**  
12 **LIKELY TO OCCUR?**

13 A. No. As my discussion above illustrates, objections and comments generally occur  
14 earlier. Retirement is so late in the process that those discussions, and the  
15 implementation (including implementation over CLEC objection), have already  
16 taken place. Whether or not a customer wanted to move to XML, Qwest required  
17 CLECs using EDI to move to XML for ordering when Qwest implemented its

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<sup>37</sup> Exhibit RA-10 to Albersheim Direct, March 28, 2006 CMP ad hoc meeting minutes (“Connie Winston - Qwest stated that we want the ability to share questions/answers that we have received on the XML migration. She said that we would like to use the existing EDI log to track the Q& A’s and any open issues. Connie said that questions can still be sent to [CMPCR@qwest.com](mailto:CMPCR@qwest.com).”).

<sup>38</sup> See <http://www.centurylink.com/wholesale/ima/xml/>

<sup>39</sup> Albersheim Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011), p. 11, lines 1-5; *see also*, Albersheim Answer Testimony, CO Docket No. 11F-436T, Sep. 15, 2011, p. 11, lines 4-8.



1 second CR.<sup>40</sup> Because there was no vote as to whether Qwest would retire IMA-  
2 EDI and therefore, per Qwest's decision, EDI would no longer exist, it is incorrect  
3 to suggest that CLECs "approved"<sup>41</sup> the retirement.

4 In contrast to the move to IMA-XML, for which there were no applicable merger  
5 terms in 2005-2006, for repair OSS today, the merger settlement agreements  
6 require a majority vote before retirement of a replacement OSS. This is one  
7 example of how the merger settlement agreements require "CMP Plus More."  
8 Qwest must follow CMP (per Integra settlement agreement paragraph 12b), and  
9 Qwest must also obtain a majority vote before replacing or retiring a Qwest OSS  
10 interface (per paragraph 12c).

11 **Q. PLEASE DESCRIBE EXHIBIT BJJ-73 REGARDING CMP CHANGE**  
12 **REQUEST SCR062107-01EX INITIATED BY COMCAST.**

13 A. Exhibit BJJ-73 contains the "CR Detail" for a systems change request (number  
14 SCR062107-01EX) initiated by Comcast. In its CR, Comcast asked Qwest to  
15 extend the sunset date of IMA release 19.0 from October 27, 2007 to November  
16 30, 2007. Comcast said it needed the extension because "Comcast needs to

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<sup>40</sup> Exhibit BJJ-72, May, 18, 2005 systems CMP meeting minutes at JC001131.

<sup>41</sup> Albersheim Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011), p. 11, lines 3-4; *see also*, Albersheim Answer Testimony, CO Docket No. 11F-436T, Sep. 15, 2011, p. 11, line 4.

1 ensure enough time for development, testing and production turn up to the new  
2 XML Interface and needs additional time to achieve this goal.”<sup>42</sup>

3 **Q. WAS COMCAST’S REQUEST TO MOVE THE SUNSET DATE OF IMA**  
4 **RELEASE 19.0 GRANTED?**

5 A. No. Comcast submitted the CR as an exception per Section 16 of the CMP  
6 document.<sup>43</sup> Per Section 16, a unanimous vote is required to allow an exception  
7 request to move forward. Qwest was the only voting participant to vote no.<sup>44</sup>  
8 Exhibit BJJ-73 also illustrates, therefore, that there is more to the history of XML  
9 for ordering than just the EDI retirement change request attached to  
10 Ms. Albersheim’s testimony as Exhibit RA-10.

11 **Q. PLEASE DESCRIBE THE CMP DOCUMENT, FROM WHICH**  
12 **EXCERPTS ARE INCLUDED IN EXHIBIT BJJ-74.**

13 A. Exhibit BJJ-74 contains excerpts from a document known as the “CMP  
14 Document.” In the Qwest-Eschelon interconnection agreement (“ICA”) arbitration  
15 in Washington, Ms. Albersheim was asked how the CMP is governed,  
16 and she responded that the “processes and procedures for the CMP and the roles  
17 and responsibilities of the CMP participants are clearly delineated in the Qwest

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<sup>42</sup> See Comcast’s Description of Change, Exhibit BJJ-72 at JC001133.

<sup>43</sup> See Exhibit BJJ-74, Section 16 of the CMP Document.

<sup>44</sup> See Exhibit BJJ-73, Qwest prepared 7/18/07 CMP system meeting minutes, at JC001133-JC001134.

1 Wholesale Change Management Process Document (the ‘CMP Document’).<sup>45</sup>  
2 She indicated that the provisions of the CMP Document “were developed jointly  
3 by Qwest and,”<sup>46</sup> and that Eschelon (now an Integra entity) was “an active and  
4 vocal participant in the CMP Redesign process.”<sup>47</sup> The CMP Redesign process  
5 was performed in conjunction with Qwest’s Section 271 bid for approval to enter  
6 the long distance market. Ms. Albersheim testified that the CMP was “evaluated  
7 as part of the extensive section 271 investigation” and that, “[a]s in Washington,  
8 the CMP was approved by the other 13 states in Qwest’s local service region.”<sup>48</sup>

9 In Section 1.0 of the CMP Document, the relationship of interconnection  
10 agreements and changes implemented through CMP (such as revisions to the  
11 Product Catalog or “PCAT”) is addressed as follows:

12 In cases of conflict between the changes implemented through this CMP  
13 and any CLEC interconnection agreement (whether based on the  
14 CenturyLink SGAT or not), the rates, terms and conditions of such  
15 interconnection agreement shall prevail as between CenturyLink and the  
16 CLEC party to such interconnection agreement. In addition, if changes  
17 implemented through this CMP do not necessarily present a direct conflict  
18 with a CLEC interconnection agreement, but would abridge or expand the  
19 rights of a party to such agreement, the rates, terms and conditions of such

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<sup>45</sup> Albersheim Direct, *In the Matter of the Petition of Qwest Corporation for Arbitration with Eschelon Telecom, Inc., Pursuant to 47 U.S.C. Section 252 of the Federal Telecommunications Act of 1996*, WA Docket No. UT-063061 (Sept. 29, 2006) [“WA Qwest-Eschelon ICA Arbitration”], p. 7, lines 13-16; *see also*, Albersheim Direct, *In the Matter of the Petition of Qwest Corporation for Arbitration with Eschelon Telecom, Inc., Pursuant to 47 U.S.C. Section 252 of the Federal Telecommunications Act of 1996*,” CO Docket No. 06B-497T (Dec. 15, 2006) [“CO Qwest-Eschelon ICA Arbitration”], p. 6, lines 17-20.

<sup>46</sup> Albersheim Direct, WA Qwest-Eschelon ICA Arbitration (Sept. 29, 2006), p. 7, lines 15-16.

<sup>47</sup> Albersheim Direct, WA Qwest-Eschelon ICA Arbitration (Sept. 29, 2006), p. 23, lines 8-9; *see also*, Albersheim Direct, CO Qwest-Eschelon ICA Arbitration (Dec. 15, 2006), p. 21, lines 3-4.

<sup>48</sup> Albersheim Direct, WA Qwest-Eschelon ICA Arbitration (Sept. 29, 2006), p.6, line 7 – p. 7, line 10; *see also*, Albersheim Direct, CO Qwest-Eschelon ICA Arbitration (Dec. 15, 2006), p. 5, line 19 – p. 6, line 15.

1 interconnection agreement shall prevail as between CenturyLink and the  
2 CLEC party to such agreement.

3 The CMP Document ““provides a detailed process for escalations. . . . In the  
4 event the competitive LEC wishes to further dispute an issue, there is a defined  
5 dispute resolution process which provides for arbitration, mediation, or  
6 submission to the appropriate regulatory agency.””<sup>49</sup>

7 Mr. Denney and I cite to the CMP Document in our testimony.

8 **Q. MS. ALBERSHEIM DESCRIBES CMP, STATING IT IS “INTENDED TO**  
9 **FACILITATE DISCUSSION.”<sup>50</sup> IS THIS A LIMITED VIEW OF CMP?**

10 A. Yes. There is more to CMP than discussion. Regarding the scope of CMP, the  
11 CMP Document states in Section 1.0:

12 This document defines the processes for change management of  
13 Operations Support Systems (OSS) Interfaces, products and processes  
14 (including manual) as described below. CMP provides a means to address  
15 changes that support or affect pre-ordering, ordering/provisioning,  
16 maintenance/repair and billing capabilities and associated documentation  
17 and production support issues for local services (local exchange services)  
18 provided by Competitive Local Exchange Carriers (CLECs) to their end  
19 users. This CMP is applicable to CenturyLink’s 14 state in-region serving  
20 territory.

21 This CMP is managed by CLEC and CenturyLink Points of Contact  
22 (POCs) each having distinct roles and responsibilities. The CLECs and  
23 CenturyLink will hold regular meetings to exchange information about the  
24 status of existing changes, the need for new changes, what changes

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<sup>49</sup> 9-State 271 Order, WC Docket No. 02-314, FCC 02-232, Dec. 23, 2002 at ¶132, *quoted in* Albersheim Direct, WA Qwest-Eschelon ICA Arbitration (Sept. 29, 2006), p. 5, line 21 – p. 6, line 4; *see also*, Albersheim Direct, CO Qwest-Eschelon ICA Arbitration (Dec. 15, 2006), p. 5, lines 13-17.

<sup>50</sup> Albersheim Answer Testimony., CO Docket No. 11F-436T (Sept. 15, 2011), p. 13, lines 18-20.

1 CenturyLink is proposing, how the process is working, etc. The process  
2 also allows for escalation to resolve disputes, if necessary.

3 CenturyLink will track changes to OSS Interfaces, products and processes.  
4 This CMP includes the identification of changes and encompasses, as  
5 applicable, Design, Development, Notification, Testing, Implementation,  
6 Disposition of changes, etc. (See Change Request Status Codes, Section  
7 5.8). CenturyLink will process any such changes in accordance with this  
8 CMP.<sup>51</sup>

9  
10 **Q. MR. HUNSUCKER TESTIFIES THAT “CMP IS NOT A UNILATERAL**  
11 **FORUM.”<sup>52</sup> HAS QWEST LITIGATED THAT ISSUE**  
12 **UNSUCCESSFULLY IN THE PAST?**

13 A. Yes. In the merger proceeding, Mr. Gates provided the following example from  
14 the Qwest-Eschelon Minnesota arbitration proceeding in which the Commission  
15 adopted the ALJ’s finding of unilateral Qwest conduct in CMP:

16 **Q. ARE YOU SAYING THAT QWEST’S BUSINESS PRACTICES**  
17 **AND PROCEDURES, LEVEL OF INFORMATION, AND CMP**  
18 **ARE FLAWLESS OR SHOULD BE SET IN STONE?**

19  
20 A. No. Regarding the role of Qwest CMP, CLECs including Integra said  
21 in their recent FCC Comments in the Qwest-CenturyLink Merger docket  
22 that the CMP performs an essential function, even though CLECs have  
23 encountered difficulties with Qwest’s CMP. As an example, CLECs  
24 pointed to Qwest’s implementation of unwanted changes over CLEC  
25 objections. After reviewing examples Eschelon provided in the Minnesota  
26 Eschelon-Qwest arbitration case, the Minnesota Arbitrators, as affirmed  
27 by the Minnesota Commission, found that *‘Eschelon has provided*  
28 *convincing evidence that the CMP process does not always provide*  
29 *CLECs with adequate protection from Qwest making important*

<sup>51</sup> Exhibit BJJ-74 (CMP Document, Section 1.0), p. 2.

<sup>52</sup> Hunsucker Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011), *see also*, Hunsucker Answer Testimony, CO Docket No. 11F-436T, p. 6, line 19.

1                    *unilateral changes in the terms and conditions of interconnection.*’ In a  
2                    complaint Eschelon filed against Qwest in Arizona regarding expedites,  
3                    the Arizona Staff said, ‘This case is about not only a breach of Eschelon’s  
4                    ICA, but inappropriate use of the CMP to affect a material change to all  
5                    CLECs’ rights under their current ICAs with Qwest.’ Nevertheless, in a  
6                    relative comparison, Qwest’s CMP, with all of its flaws, is still better than  
7                    the untested, unknown process that CenturyLink may replace it with post-  
8                    merger.<sup>53</sup>

9                    Ms. Albersheim and I were both witnesses in the Minnesota interconnection  
10                    agreement arbitration and the Arizona complaint case discussed by Mr. Gates.  
11                    Those occurred pre-merger, and Mr. Hunsucker was not involved.  
12                    Mr. Hunsucker has not attended any CMP meetings since the merger and Ms.  
13                    Albersheim just recently started attending CMP meetings on this issue.<sup>54</sup>

14                    **Q. MR. HUNSUCKER TESTIFIES THAT THE MERGER SETTLEMENTS**  
15                    **CONTAIN PROVISIONS THAT “REQUIRE THE CONTINUATION OF**  
16                    **THE CHANGE MANAGEMENT PROCESS.”<sup>55</sup> PLEASE RESPOND.**

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<sup>53</sup> Gates Answer Testimony, Docket No. 10A-350T (Sept. 15, 2010), p. 141, line 1 – p. 142, line 2 (emphasis added), quoting *In re Petition of Eschelon Telecom, Inc. for Arbitration of an Interconnection Agreement with Qwest Corporation Pursuant to 47 U.S.C. § 252(b) of the Federal Telecommunications Act of 1996*, Arbitrators’ Report, MPUC Dkt. Nos. P-5340,421/IC-06-768, ¶ 22 (rel. Jan. 16, 2007) and Arizona Corporation Commission Staff Reply Brief, AZ Docket No. T-03406A-06-0257 at p. 1.

<sup>54</sup> Ms. Albersheim states that “Qwest’s participants in the CMP are primarily wholesale operations and IT personnel.” Albersheim Answer Testimony., CO Docket No. 11F-436T (Sept. 15, 2011), p. 15, lines 11-12. Ms. Albersheim, who participates in CMP, is an attorney and a “senior witnessing representative.” *Id.* p. 2, lines 4-5. Although she says that she is not participating in CMP meetings as an attorney, see *id.* p. 15, lines 13-20, she nonetheless has been trained as an attorney, and she regularly deals with responses to regulatory issues as part of her job as a senior witnessing representative. See *id.* p. 2, lines 12-14.

Ms. Albersheim does not regularly attend CMP meetings. The list of CMP attendees for 2008 show that Ms. Albersheim did not attend the Dec. 17, 2008 CMP meeting regarding the repair OSS change requests. The CMP minutes show that Ms. Albersheim did not attend the 2010-2011 CMP meetings relating to these issues until after litigation commenced. In contrast, I have regularly participated in CMP meetings for years. My job is Director of Carrier Relations, but I act as a witness because I have knowledge of the facts.

<sup>55</sup> Hunsucker Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011), p. 6, lines 11-12; see also, Hunsucker Answer Testimony, CO Docket No. 11F-436T, p. 6, lines 7-8.

1 A. Mr. Hunsucker did not identify the provision(s) of the settlement  
2 agreements to which he refers. Because he makes this comment in the context of  
3 his discussion of OSS, it may appear that he is referring to the provision in  
4 Section 12(b) of the Integra settlement agreement requiring use of the procedures  
5 in the CMP Document for purpose of OSS changes discussed in Section 12. The  
6 continuation or “retention”<sup>56</sup> of CMP has a different history, however. The  
7 merger settlement agreements are not the primary source of the Merged  
8 Company’s obligation to retain and continue Qwest’s CMP. Mr. Denney  
9 discusses Qwest’s Section 271 and Bell Operating Company (“BOC”) obligations  
10 with respect to CMP in his responsive testimony. Additionally, the CMP  
11 Document requires a unanimous vote to change Qwest’s CMP.<sup>57</sup>

12 In the Joint CLECs’ proposal in the merger proceeding, the list of conditions  
13 contained a provision (then known as Condition 17) which provided that the  
14 Merged Company will maintain Qwest’s CMP using the terms in the Qwest CMP  
15 Document, and will dedicate resources needed to complete pending CLEC change  
16 requests in a commercially reasonable time frame.<sup>58</sup> The Staff had a similar  
17 condition (Condition 16). Mr. Hunsucker testified in the merger proceeding that  
18 “CenturyLink acknowledges that any future CenturyLink changes must comply

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<sup>56</sup> Hunsucker Direct Testimony, WA Docket No. UT-111254, (Oct. 14, 2011), p. :6, line 8; *see also*, Hunsucker Answer Testimony, CO Docket No. 11F-436T, p. 6, line 4.

<sup>58</sup> Exhibit TG-9, Condition NO. 17, p. 8, to the Responsive Testimony of Timothy Gates of QSI, WA Dkt. UT-100820 (Sept. 27, 2010); *see also*, Exhibit TG-8, Condition No. 17, p. 8, to the Direct Testimony of Timothy Gates of QSI, CO Dkt. No. 10A-350T (Sept. 15, 2010).

1 with . . . formal obligations such as Qwest’s CMP” and that “[w]ith the existing  
2 OSS, business practices and procedures and CMP obligations in place, no  
3 condition is necessary.”<sup>59</sup> The language of Conditions 16 and 17 does not appear  
4 in the merger settlement agreements.

5 The Colorado Staff addressed the absence that language during the November 10,  
6 2010 hearing in the Colorado merger proceeding. When questioned by  
7 Mr. Bunker, Lynn Notarianni, Colorado Staff witness, testified:

8 . . . a CMP process that would remain in place -- the Change Management  
9 Process -- that would remain in place. And the reason we were particularly  
10 satisfied with that piece of it -- I know this was a question earlier around  
11 that paragraph, a phrasing, couldn't the CMP process disappear.

12  
13 Well, it’s my understanding that the CMP process already today has a  
14 provision in it that there has to be a unanimous vote for the CMP to go  
15 away. And I don’t think there is going to be a unanimous vote by the  
16 CLECs to have the CMP go away. So that alleviated that concern for us.<sup>60</sup>

17  
18 **Q. DOES THE ABSENCE OF CONDITIONS 16 AND 17 FROM THE**  
19 **MERGER SETTLEMENT AGREEMENTS MEAN THAT THE MERGED**  
20 **COMPANY MAY DISCONTINUE CMP WITHOUT VIOLATING THE**  
21 **MERGER SETTLEMENT AGREEMENTS?**

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<sup>59</sup> Hunsucker Rebuttal, WA Docket No. UT-100820 (Sept. 27, 2010), pp. 16-17; *see also*, Hunsucker Rebuttal, CO Docket No. 10A-350T (Oct. 15, 2010), p. 19.

<sup>60</sup> CO Hrg. Tr., Dkt. No. 10A-350T Vol. 3 (Nov. 10, 2010), p. 202 line 25 through p. 203 line 5 (Ms. Notarianni, CO PUC).



1 A. No. Paragraph 10 of the Integra settlement agreement (Exhibit BJJ-3) provides  
2 that the Merged Company will “make available to each wholesale carrier in the  
3 legacy Qwest ILEC service territory the types and level of data, information, and  
4 assistance made available as of the Closing Date concerning Qwest’s wholesale  
5 Operational Support System functions and business practices and procedures,  
6 including information provided via . . . the change management process.”  
7 Additionally, paragraph 6 requires Qwest to comply with its obligations pursuant  
8 to Sections 251 and 252 of the Act, and paragraph 7 provides that Qwest is  
9 subject to all requirements applicable to Bell Operating Companies (“BOCs”).  
10 Mr. Denney addresses Qwest’s obligations as a BOC and per Section 271 in his  
11 responsive testimony.

12 **Q. PLEASE DESCRIBE EXHIBIT BJJ-75.**

13 A. Exhibit BJJ-75 is a September 22, 2011 email from the attorney representing  
14 CenturyLink to the attorney representing Integra regarding the designation of a  
15 response to an information request.

16 **Q. PLEASE DESCRIBE THE HEARING TRANSCRIPT EXCERPTS IN**  
17 **EXHIBIT BJJ-76.**

18 A. Exhibit BJJ-76 contains excerpts from the transcript of a February 8, 2011  
19 Minnesota PUC hearing in Minnesota regarding Docket Nos. P-421, et al./PA-10-  
20 456 (The Merger Docket).

1 **Q. PLEASE DESCRIBE THE CMP NOTIFICATIONS IN EXHIBIT BJJ-77.**

2 A. Exhibit BJJ-77 includes three CMP notifications. The first notification is a  
3 November 14, 2011 announcement that the Merged Company is providing the  
4 release draft documents for the CEMR/MTG release scheduled for February 13,  
5 2011. The notification said CLEC comments were due November 17, 2011 and  
6 included a link to two CEMR screens that the Merged Company said were  
7 changing. At the November 16, 2011 monthly CMP meeting, the Merged  
8 Company indicated that the MTG release production date had moved from  
9 December 12, 2011 to February 13, 2012 and that the Merged Company would be  
10 sending out a system notice to reflect the change. Integra asked if the Merged  
11 Company would move the deadline for comments on CEMR/MTG release in light  
12 of the date being moved to February 2012. The Merged Company said no,  
13 indicating that the intent was to keep the timeline the same but move the  
14 implementation date out. It said the CMP Document required that the timeline  
15 had to be at least 28 days. If the comment deadline was moved out, however, this  
16 requirement would be met, because use of “at least” allows a longer time  
17 period. The Merged Company agreed to discuss the request internally. Later that  
18 day, the Merged Company sent an email stating, “On the CMP monthly  
19 conference call today in regard to the CEMR-MTG GUI release notification  
20 SYST.CEMR.11.14.11.F.09687.CEMR\_Rel\_Feb2012DraftDocs, CenturyLink  
21 was asked if the CEMR-MTG GUI release timeline should be changed. After

1 consideration, CenturyLink will continue to follow the current CEMR-MTG GUI  
2 release timeline. Only the Release Production date has changed to February 13,  
3 2012.” In other words, the Merged Company denied Integra’s request without  
4 providing any reason.

5 The second notification, dated November 21, 2011, is the Merged Company  
6 announcement that it is providing its response to CLEC comments regarding the  
7 CEMR-MTG release draft documents. As to CLECs objections,<sup>61</sup> the Merged  
8 Company responded that “the comment had been noted” but provided no  
9 substantive response to the objections. The Merged Company confirmed that it  
10 made a code change to CEMR, which caused the two screens (circuit history and  
11 trouble history) to change. Previously, the Merged Company had indicated that  
12 CEMR users would not experience changes.

13 The third notification in Exhibit BJJ-77 is a Merged Company announcement that  
14 the implementation date for MTG as to MEDIACC has changed. The notice said  
15 that the Merged Company is sending a revised final notice for MTG to notify  
16 customers of an update to the planned Release Production Effective Date and the  
17 planned Release Production Effective Date is now February 13, 2012. The notice  
18 said the change in the Release Production Date was also relayed in the November  
19 CMP Monthly Systems meeting held on November 16, 2011. The Merged

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<sup>61</sup> Integra, PAETEC and **tw telecom** made similar objections in its comments. See Exhibit BJJ-77 at JC001169-JC00171.

1 Company said: “In addition, a NOTE has been added in the Timeline below  
2 which states: No implementation in the state of Minnesota.” The Merged  
3 Company included an updated timeline in the notice.

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 A. Yes.

6 GP:3087249 v1