

1 A. Yes. Washington Staff recommends that “Gateway Availability PIDs, GA-3 and GA-6  
2 contained in the Qwest Performance Assurance Plan (QPAP), and any other PIDs that  
3 may apply, along with all required penalties, will continue to be required.”<sup>115</sup>  
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11 **VII. PROPOSED SOLUTIONS TO ADDRESS ASSERTED OSS RISK**

12 **A. UPDATE MEDIACC AND KEEP MEDIACC/CEMR OPERATIONAL**

13 **Q. MS. ALBERSHEIM CLAIMS THAT THE COSTS OF DEVELOPING A NEW**  
14 **B2B INTERFACE WOULD BE ON PAR WITH THE COSTS OF UPDATING**  
15 **MEDIACC.<sup>116</sup> DID QWEST OR CENTURYLINK CONSIDER THE COST**  
16 **IMPOSED UPON CLECS?**

17 A. No, it does not appear that they did. Ms. Albersheim relies upon Confidential Exhibit  
18 RA-9 to support the decision to abandon MEDIACC, but the document barely mentions  
19 costs imposed upon CLECs.<sup>117</sup>

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<sup>115</sup> Notarianni CO Staff Cross Answer Test., Docket No. 11F-436T (Oct. 31, 2011), p. 13, line 11 – p. 14, line 2.

<sup>116</sup> Williamson Test., WUTC Docket No. UT-111254, (Nov. 30, 2011), p. 24, lines 27-30.

<sup>116</sup> Albersheim Direct Test., WUTC Docket UT-111254, (Oct. 14, 2011), p. 6, line 14 – p. 7, line 1; *see also*, Albersheim Answer Test., CO Docket No. 11F-436T (Sep. 15, 2011), p. 7, lines 4-8.

<sup>117</sup> Albersheim Direct Test., WUTC Docket No. 111254 (Oct. 14, 2011) Confidential Exhibit RA-9, p. 4. *See also*