

Because CEMR goes through MEDIACC first and then MEDIACC interfaces with Qwest's back-end systems,¹⁰ a failure of MEDIACC, such as during an integration or system change, would also affect CEMR users and their customers.

Another direct impact to each Joint CLEC of the Merged Company's project is violation of the CLEC's settlement agreement with Qwest and CenturyLink. Violation of the settlement agreement has independent consequences. It undermines confidence and creates the very uncertainty that the settlement agreements were supposed to address. It also imposes a burden and costs on Joint CLECs to enforce their rights.

Request No. 1-4: If a MEDIACC user, how does your company convert XML transactions to the CMIP standard? What costs are associated with such conversion? Produce documents identifying any such costs.

Objection: The Joint CLECs further object to the request on the grounds that it seeks information that is not relevant to any matter at issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

Response: Subject to, and without waiving, the foregoing objections, PAETEC responds that it uses third party software to convert XML to CMIP and, as indicated in PAETEC's August 16, 2011 email to CMP, PAETEC provided the name of the software vendor name to the Merged Company in their August 9, 2011 meeting. The cost incurred to support the software is an annual licensing fee reflected in the attached confidential invoice (Confidential Attachment 1 to this Response). Additionally, the Merged Company may obtain information about costs (e.g., licensing fees) from that vendor or any vendor identified by Qwest/CenturyLink.

Request No. 1-5: How do you communicate repair issues to other major carriers today:

- a. AT&T;
- b. Verizon;

¹⁰CO Merger Compliance Docket, Direct Testimony of Bonnie Johnson, Exhibit BJJ-53, July 1, 2011 Qwest CMP Matrix, p. 56 (JC000809).

Joint CLEC Responses to Qwest/CenturyLink First
Information Request – Confidential Attachment 1



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Jan 13, 2011	20110113-1

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