

Announcement Date: May 20, 2011
Effective Date: December 12, 2011
Notification Number: SYST.MEDI.06.30.11.F.09283.Followup_Resp_Commnts_MTG
Notification Category: Systems Notification
Target Audience: CLECs, Resellers
Subject: CMP — Qwest Responses to Additional CLEC comments on Maintenance Ticketing Gateway (MTG) - New Application to Application Interface
Associated CR # or System Name and Number: Qwest CR# SCR121608-02

On June 30, 2011, Qwest is providing additional information associated with the CLEC comments from Integra on the Maintenance Ticketing Gateway (MTG). As agreed to in the June monthly CMP meeting, the Qwest responses are included in an updated matrix that compiles comments received on multiple dates. This follow-up Qwest response will be posted to the Wholesale Document Review Archive site at http://www.qwest.com/wholesale/cmp/review_archivesystem.html associated with the January 20, 2011 notification SYST.MEDI.01.20.11.F.08765.AddlCmmntsCycleMTG_Intrfc.

The initial functionality of the Maintenance Ticketing Gateway (MTG) includes:

- Providing an effective mechanism to automate communication and the processing of trouble ticket information
- Implementing electronic trouble ticketing capabilities with Qwest for the exchange of Trouble Ticket information for various Qwest products and services purchased by the customer
- Providing an electronic bonding facility that enables Qwest customers to use their own repair/ticketing system to manage troubles on their Qwest products and services.

The benefit of this new application will allow Qwest and Wholesale customers to use a more advanced type of technical communication based on internet standard protocols, web services, and telecommunications industry standard markup languages.

Supporting Material:

Change Request SCR121608-02 is contained in the Systems Interactive Report posted to the Qwest Web site at <http://www.qwest.com/wholesale/cmp/changerequest.html>.

If you have any questions on this subject, please submit comments though the following link: <http://www.qwest.com/wholesale/cmp/comment.html>.

Sincerely,

Qwest Corporation

**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.MEDI.03.10.11.F.08921.RESP_ADDL_COMMNTS_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.

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
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,	<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 	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>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>

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
<p>identify Qwest.</p>	<p>vendor.</p> <ul style="list-style-type: none"> • The Sybase database runs on HPK460 servers which are supported by the vendor at a best effort level. • The Sybase database runs on Operating system HP-UX-10.20, which is not supported by the vendor. • The database used by CEMR is Oracle 10.2.0.4, which is not supported by the vendor. • The operating system for the Oracle DBMS is Redhat AS 3, which is not supported by the vendor. • The hardware for the Oracle DBMS is an IBM Blade HS20 type 8842 Model 11u, which is supported by the vendor. • The CEMR Operating system is Redhat 5.5, which is supported by the vendor. • The CEMR hardware is IBM LADE HS21 type 8853 Model L5U, which is supported by the vendor, and HP Blade BL640C G1 which is supported by the vendor. • The software used by both systems is CMIP Toolkit: Vertel 2.1.1, which is not supported by the vendor, which is no longer in business. • Both CEMR and MEDIACC are 	<p>information with the document. A preliminary review of that document suggests that, to the extent a problem with CEMR/MEDIACC exists, any alleged problem may be of Qwest’s own making. Qwest appears to have had options available to it to avoid the situation it claims exists today. Qwest developed the CEMR and MEDIACC applications, and Qwest has not shown whether it explored all options to maintain and upgrade them as needed and, if not, why not. Choices on Qwest’s part should not result in a shifting of expenses to CLECs to move systems when a move may not be or have been necessary.</p> <p>In any event, before CEMR/MEDIACC may be replaced, the company must adhere to the requirements of the merger settlement agreements, including paragraph 12 and subparts of the Integra agreement. This is true regardless of the reason for the replacement and regardless of whether any or all CLECs have migrated to a different system. See, <i>e.g.</i>, Row 2(f) & §4.</p>	<p>During the March 16, 2011 CMP meeting, Qwest provided a document titled “MTG Vendor Support Information 031511” in an effort to document that support does not exist. Some of that information is repeated below however the full Vendor documents titled “HP-UX 11i Support Matrix” and the “ORACLE INFORMATION-DRIVEN SUPPORT” are in PDF format are not repeated here. Those documents will continue to be available on the Wholesale Calendar at http://wholesalecalendar.gwestapps.com/detail/289/2011-03-16.</p> <p>In regard to Sybase database support, the following link http://www.sybase.com/detail?id=1008925 provides the “End of Support Notification for Enterprise Solutions Enterprise Solutions Division products on the eleven series of Sybase Adaptive Server IQ” from June 2001.</p>

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
	<p>Qwest developed applications, running on the hardware and operating systems specified above, using the databases specified above, and using the CMIP Toolkit specified above.</p>		<p>NOTE: Qwest is prepared to provide a brief review of this technical information with customer technical personnel at the beginning of the Ad hoc conference call scheduled for June 8, 2011. See notification number CMPR.MEET.05.20.11.F.0 9163.MTG_MultipleAdHoc Meetings for further details.</p>
<p>b. Provide documentation from each vendor/manufacture, in the form of public information (posted to its website for example) or communication the vendor has provided to Qwest, indicating that there are problems with CEMR/MEDIACC or that they will not be supported (or support will be on a best effort basis). Also provide documentation to indicate when this change took place. (When did the vendor/manufacture take this position? How long has Qwest known of this situation?)</p>	<p>Qwest is continuing to work with appropriate vendors to gather this information.</p>	<p>Qwest did not post a document with some vendor information to its website until March 15 or March 16, 2011. Qwest provided no explanatory information with the document. Integra continues to review it. The document does not adequately support that the alleged situation exists or was unavoidable. See Row 1(a). For example, the Qwest document states that HP-UX10.20 Operating System support ended in June of 2003. Qwest does not explain why, if that is the case, it has taken Qwest more than <i>seven years</i> to do something about it. See also Row 2(1).</p>	<p>FROM partial response associated with notification sent on 5/20/11:</p> <p>See Qwest Response to Row 1.a above.</p>
<p>c. Provide documentation from each vendor/manufacture, in the form of public information (posted to its website for</p>	<p>Qwest is continuing to work with appropriate vendors to gather this information.</p>	<p>Qwest did not post a document with some vendor information to its website until March 15 or March 16, 2011. Qwest provided no</p>	<p>FROM partial response associated with notification sent on 5/20/11:</p>

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
<p>example) or communication the vendor has provided to Qwest, indicating that replacement parts are no longer available and parts must be cannibalized from used equipment purchased from dealers [Power Point (PP) presentation, p. 2.] How long has this been the case?</p>		<p>explanatory information with the document. Integra continues to review it. The document does not adequately support that the alleged situation exists or was unavoidable. See Row 1(a). For example, the Qwest document states that HP-UX10.20 Operating System support ended in June of 2003. Qwest does not explain why, if that is the case, it has taken Qwest more than <i>seven years</i> to do something about it. See also Row 2(1).</p>	<p>See Qwest Response to Row 1.a above.</p> <p>As stated above, Qwest is prepared to provide a brief review of this technical information with customer technical personnel at the beginning of the Ad hoc conference call scheduled for June 8, 2011.</p>
<p>d. Qwest provides a chart in its Power Point presentation that shows an “E” on the graph that presumably denotes the “END.” Provide any documentation that shows that CEMR and MEDIACC are at or close too this cycle in the chart. (PP, p. 3.)</p>	<p>The fact that hardware used to support MEDIACC is over 12 years old supports that the hardware is at end of life (see above).</p>	<p>Qwest provided no documentation in response to this Integra request for documentation. Qwest relies on the fact that CEMR/MEDIACC are 12 years old for its position. Are there any other OSS at Qwest that are approximately that old or older? (For example, IMA is at least 12 years old, correct?) Is Qwest claiming any of them are at the end of their life?</p>	<p>FROM partial response associated with notification sent on 5/20/11:</p> <p>See Qwest Response to Row 1.a above.</p> <p>Following hardware/software used to run MEDIACC:</p> <ul style="list-style-type: none"> - Sybase 11.5.1: Please see letter: http://www.sybase.com/detail?id=1008925 - HP-UX-10.20: Please refer to page 3 of 15 of the following link: http://h20338.www2.hp.com/hpux11i/downloads/public_hp-ux_systems_support.pdf. - HPK460 – For a latter operating system (HP-

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
			<p>UX – 11i) there is support until 2013 that does not apply to the HPK460 being used in MEDIACC today because it is riding on the HP-UX 10.20 which is no longer supported. When support date has expired vendor will provide best effort support as needed.</p> <p>- CMIP Toolkit: Vertel 2.1.1: was acquired by Xelas Software in January of 2004. That acquisition included the software IPR and customer contracts. Vendor has indicated support for current setup will be limited.</p>
<p>e. Qwest said in CMP that CEMR/MEDIACC is not a “high availability system with fail over.” Is that an accurate description? Is this a new development? If not, and this has been true for some time, why retire the system now and not after two years? Will the planned changes result in a high availability system with fail over?</p>	<p>The CEMR/MEDIACC applications are targeted at a 99.5% overall availability; however, fail-over requires manual processes, and failure results in outages.</p>	<p>Qwest does not answer all of the questions, and does not answer any question fully. Integra’s questions are ongoing. Qwest admitted in CMP that there were fewer outages last year than there have been in any other year since 2003.</p>	<p>FROM partial response associated with notification sent on 5/20/11:</p> <p>See March 10, 2011 response.</p> <p>The MTG developers are currently reviewing and determining how the availability will be addressed as part of the overall design process to help insure failure does not result in an outage.</p>

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
			<p>As noted as of May 18, 2011 the MEDIACC Retirement CR (SCR121608-01) was moved from deferred to withdrawn.</p> <p>MTG will have high availability with fail over. Gateway availability will be consistent with CenturyLink's obligations.</p>
<p>f. Qwest said it may defer retirement of CEMR/MEDIACC but did not provide specifics. Integra asked Qwest to instead withdraw its retirement Change Request. Will Qwest withdraw its retirement Change Request in CMP? If not, will Qwest defer it? If Qwest will defer it, we need to know the length of time it will be deferred. Will Qwest commit to defer it for at least two years? If not, for what time period does Qwest plan to defer it?</p>	<ul style="list-style-type: none"> As stated in the February CMP call, Qwest does agree to place the MEDIACC retirement CR in a Deferred status until after the implementation of MTG, at which point Qwest will evaluate the transition of customers to MTG and working with the CLECs will determine next steps for retirement of both CEMR and MEDIACC. The deferment of the CEMR/MEDIACC CR occurred the week of February 28. To clarify: by deferring the MEDIACC CR until post implementation, the timeline for CEMR/MEDIACC retirements based on CMP requirements would be over 450 days from today. In addition to the 450 	<p><i>First bullet:</i> Qwest over-states Qwest's statements on the February CMP call. As reflected in the Qwest-prepared meeting minutes from that call, Qwest said it "may" place the MEDIACC CR in a Deferred status, and Qwest did not commit on the call to any time period for the length of the deferment. A deferment occurs when Qwest changes the status in the CR Detail on its website, and that did not occur until March.</p> <p><i>Second bullet (except last sentence):</i> Deferring the MEDIACC CR as described by Qwest is not fully documented and does not satisfy the terms of the Qwest-CenturyLink-CLEC merger settlement agreements. Qwest appears to be creating its own process and own</p>	<p>FROM partial response associated with notification sent on 5/20/11:</p> <p>The MEDIACC CR was placed in Withdrawn status in the May 18, 2011 monthly CMP meeting</p> <p>As stated previously, questions regarding the Qwest-CenturyLink-CLEC merger settlement agreements are outside of the scope of CMP.</p> <p>The eventual retirement of MEDIACC will be done according to the requirements agreed to in the merger settlement agreements. While Qwest and Integra may still disagree whether</p>

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
	<p>days, Qwest will work with each CLEC to ensure a successful migration to the new interface, whether GUI or app-to-app, prior to any retirement, including an additional 12 months on top of the CMP requirement if necessary.</p>	<p>timeline (potential “additional 12 months”), but Qwest is required to adhere to the processes outlined in the settlement agreements. If CLECs cannot rely upon the timeframes in the merger settlement agreements, how can CLECs rely on the 450-day or 12-month claim? (Regarding the “12 months,” see Row 4c.) Additionally, does deferring the MEDIACC CR until post-implementation of a new system (MTG) cause the timeline changes that Qwest describes in its second bullet point, even if Qwest defers rather than withdraws its CR? An electronic search of the CMP Document shows there is no reference to “450,” so presumably Qwest selected and added together other timeframes, if Qwest is using the CMP Document. Please provide citations to the sections of the CMP Document supporting the 450-day time period and show how Qwest has calculated it. CLECs do not know at this time how Qwest may later claim a deferment affects the timeline. Specifically state how Qwest calculated the start of the 450-day period and whether it takes into account any activity to date (given that Qwest is deferring a CR and not initiating a new CR, as requested). When Qwest states that it will work with CLECs, does this</p>	<p>the initial installation and use of MTG is implicated in those merger settlements, Qwest will comply with the applicable commitments during any retirement process for MEDIACC. Given the withdrawal of the CR for the retirement of MEDIACCC and Qwest’s statement regarding following the merger conditions, Integra’s other questions are either answered or moot.</p>

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
	<p>Qwest reserves the right under CMP requirements to request an earlier retirement of any application in the event all users have migrated off the old application.</p>	<p>include, for example, a majority vote of participants in CMP? It does not appear so, because Qwest refers to working with “each CLEC.” Please address when a majority vote in CMP will occur before retirement/replacement of CEMR/MEDIACC. Paragraph 12(c)(i) of the approved Qwest-Integra merger settlement agreement provides (with emphasis added) that the “replacement or retirement of a Qwest OSS Interface <i>may not occur</i> without sufficient acceptance <i>of the replacement interface</i> by CLECs to help assure that the replacement interface provides the level of wholesale service quality provided by Qwest prior to the Closing Date.” There is no exception such as if CLECs have migrated off of a particular system earlier. According to its statement in Row 2(l), Qwest has been reviewing this issue since 2008, but Qwest requested and received no exception to paragraph 12 before Qwest executed the merger settlement agreement. Per Paragraph 12, Qwest must continue to use and offer, and can never retire or replace, CEMR and MEDIACC if Qwest does not comply with the commission-approved merger agreement procedures. Therefore, Qwest needs to answer Integra’s</p>	

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
	<ul style="list-style-type: none"> Once the improved system becomes available and is proven in testing with CLECS to provide full functionality, Qwest will measure PID/PAP performance based upon the new improved system. 	<p>repeated question as to the timing of when Qwest will take each step outlined in paragraph 12. Integra needs this information to plan for its own business needs.</p> <p><i>Second bullet (last sentence):</i> Qwest does not have the right it claims to be reserving. Qwest's commitments in the merger agreements include but also add to CMP requirements. There is a saying about seeking forgiveness rather than permission. That is not an acceptable approach here. These issues need to be dealt with in advance and not after the fact. In fact, CLECs believe they <i>have</i> been dealt with, via the merger settlement agreements, and Qwest still has not explained why it is acting as though that is not the case. (See Section 4.) Qwest also fails to explain how implementing a new, replacement system and migrating all CLECs to that system is anything other than retiring and replacing the old system, except as a matter of semantics to avoid certain obligations.</p> <p><i>Third bullet:</i> Qwest refers to an "improved" system, but Qwest has not yet demonstrated that the new system will be an improvement. Qwest refers to "testing." Qwest</p>	

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
		<p>should perform parallel testing (old versus new) and compare the two. That way, CLECs will not have to wait until it is too late to learn whether the system replacement adversely affects wholesale performance. Will the testing conform to the requirements of paragraph 12 and subparts of the Qwest-Integra merger settlement agreement, as well as any longer timeframes or additional requirements in other merger settlement agreements? What steps will Qwest take to ensure that use of a new system will not change how PID/PAD data is collected, calculated, <i>etc.</i>?</p>	
<p>g. Provide any other reasons, with supporting documentation, for the need to replace CEMR/MEDIACC at this time (and not after two years).</p>	<p>As stated in the February CMP meeting, the hardware, Operating system, database and software are old and thus more likely to fail (see above). Qwest would like to replace the systems before failure becomes a chronic problem that significantly impacts not only Qwest but the CLECs. This is a proactive effort to prevent problems before they ramp up – given the age of the systems and the advice of our IT team, when problems do occur they could ramp up quickly and impact our business, as Qwest uses CEMR and MEDIACC just like the CLECs do.</p>	<p>See above. Integra requested information earlier and summarized its requests for Qwest on February 20, 2011. Although Qwest did not respond until March 10, 2011 (later for vendor information), Qwest provided little new information. To the extent that Qwest “would like to replace the systems” before the timeframes for replacing them in the merger settlement agreements, or with different or other procedures from those described in paragraph 12 and other settlement agreements, Qwest needs to work more collaboratively with CLECs to mutually agree upon a solution. To date, Qwest is announcing unilateral</p>	<p>FROM partial response associated with notification sent on 5/20/11:</p> <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. CenturyLink intends to honor its merger agreements.</p>

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
		<p>plans, rather than mutually developing them. Qwest's response indicates that issues could impact a CLEC's business, and impact it quickly, so CLECs need to be intimately involved. An alleged problem cannot become an excuse to provide less functionality or to ignore certain obligations without taking appropriate steps to have those obligations modified to meet the identified, specific need. (See Section 4.) As Qwest is relying on the age of the OSS as its reason for the alleged replacement need, Qwest in some respects cannot distinguish this situation from other OSS of the same or similar age. If Qwest sets a precedent in this situation of proceeding ahead of merger agreement timelines or without obtaining consent and approval for modifications of obligations, what precludes Qwest from doing so for any other OSS? Do Qwest and/or CenturyLink distinguish CEMR/MEDIACC and, if so, how?</p>	

**This information is associated with the Qwest responses to Question 1 in conjunction with the notification sent on 5/20/11:
 Vendor/manufacturer Support information provided 3/18/11**

HP		
Operating System/Hardware	Response	Supporting Documents
Operating system HP-UX10.20	Support Discontinued on June 30, 2003	See Attached Document Named: Public_hp-ux_systems_support Document can also be found: http://h20338.www2.hp.com/hpux11i/downloads/public_hp-ux_systems_support.pdf
HP Hardware: HP 9000/889/K460 is supported at a "Best Effort Level."	HP Representative: HP will support hardware failures as quickly as possible but cannot guarantee that any replacement parts will be available locally and Qwest may have to wait extra time while a part is shipped to the Qwest location.	Also see above document.

Oracle		
Operating System/Hardware	Response	Supporting Documents
Oracle 10.2.04 not supported	10.2.0.4.0 continues to be supported as mentioned in the lifetime support matrix in http://www.oracle.com/us/support/library/lifetime-support-technology-069183.pdf Please note that it is a oracle lifetime support document	From the certification matrix and metalink support please see below : Support Information Oracle Database 10.2.0.4.0

Oracle

Operating System/Hardware	Response	Supporting Documents
	<p>.</p> <p>**Document Attached: Oracle_Lifetime-support-technology-069183**</p>	<p><i>End of Premium Support - Jul 30, 2010</i></p> <p><i>End of Error Correction - Apr 29, 2011</i></p> <p><i>End of Extended Support - Jul 30, 2013</i></p> <p><i>End of Sustaining Support - Indefinite</i></p> <p>New patches will stop being produced in 46 days for Oracle Database 10.2.0.4.0.</p>
<p>Is Oracle 10.2.04 supported by Linux Redhat AS3?</p>	<p>Oracle Database 10.2.0.4.0 is certified on Linux x86 Red Hat Enterprise Linux 3</p> <p>**Document Attached: Oracle_Lifetime-support-technology-069183**</p>	<p>Support Information</p> <p>Oracle Database 10.2.0.4.0</p> <p><i>End of Premium Support - Jul 30, 2010</i></p> <p><i>End of Error Correction - Apr 29, 2011</i></p> <p><i>End of Extended Support - Jul 30, 2013</i></p> <p><i>End of Sustaining Support - Indefinite</i></p> <p>New patches will stop being produced in 46 days for Oracle Database 10.2.0.4.0.</p>
<p>Qwest runs Red Hat Linux AS3 with 10.2.04 and wants to know if this OS version is old and whether its compatible with latest versions of Oracle DB.</p>	<p>The following are the operating system requirements for Oracle Database 11g release 1: Asianux 2 SP2 Asianux 3 Oracle Linux 4 Oracle Linux 5 Red Hat Enterprise Linux 4 Red Hat Enterprise Linux 5 SUSE Enterprise Linux 10</p>	<p>If Qwest has to use 11g then it will need use Red Hat Enterprise Linux 4 or higher .</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.

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.

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
<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 answers 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,</p>	<ul style="list-style-type: none"> 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 	<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</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>regarding the ability of the new system to run in a high availability with failover system (see previous bullet), Qwest must have this information if Qwest has this system already running in its IT infrastructure. In CMP, the Qwest Director of IT Infrastructure said that Qwest did not know the platform and/or environment the MTG system is going to be residing in. However, if this is an existing system in the Qwest IT network, the expectation is that there should be minimum system requirements available on the existing system to allow Qwest to provide more information to CLECs at this time. Please explain why, if Qwest is using the existing solution (Qwest Portal), more information is not available generally as to functionality and technical specifications. If information is available for this reason, please provide it.</p>	<p>writing, responses will be returned in writing. Availability of QPortal is listed above.</p> <ul style="list-style-type: none"> • QPortal is branded as QControl, and that is the name the system is known by for Qwest national customers. 	<p>them. Qwest said that Qwest is not yet prepared to answer any questions about MTG (via QPortal platform). Qwest needs to extend the timeline accordingly. It is unclear why Qwest's QPortal "experts" were unprepared to answer certain questions. For example, on the CMP call, Integra asked whether, with MTG via QPortal, a CLEC will have to log out of the repair module to view a DLR, validate a CFA, or obtain demark information. Given that Qwest has represented that MTG will have at least the same functionality as CEMR/MEDIACC, the Qwest experts should have been able to answer immediately that, no, a CLEC would not have to log out for these tasks, because they do not have to log out to perform them today with CEMR. Qwest's failure to provide this response causes concern. When Qwest is able to answer questions, Qwest should provide detailed written materials in advance of a CMP meeting at which Qwest's QPortal experts will be prepared to answer questions. At a minimum, Qwest's QPortal expert should give a detailed presentation (with written materials provided</p>	
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	<ul style="list-style-type: none"> Qwest can provide the student guide for QControl to customers if they would like to see it. However, the functionality described in the QControl student guide only describes functionality in existence today, and does not yet include functionality for the replacement systems. Therefore, the QControl student guide would be an example of how the current system works, but would not represent any functionality for the improved CEMR/MEDIACC release at this time. Documentation and training will be provided according to the preliminary timeline provided in the presentation at the February CMP meeting, and it is posted as part of this response to comments. <p>QControl is a web based system that can be accessed by any system that supports IE 7.0 or higher, or Firefox 3.5 or higher.</p>	<p>in advance to allow CLEC preparation) describing the QPortal Platform, the “CEMR functionality” to be implemented in the new system MTG, how and when CEMR functionality will be added to QPortal/MTG, and when CEMR/MEDIACC will be replaced with the new system. A written comment cycle should be established afterward so that CLECs have a fair opportunity to comment on the information provided by Qwest’s QPortal expert and for Qwest to respond.</p> <p><i>Second bullet:</i> Is Qwest saying that it developed QPortal and/or QControl? If not, please identify the vendor/owner/manufacture (all, if different). Is QControl the name that the new system will be known to Qwest CLEC customers? If not, is “MTG” the equivalent branding for CLEC customers as “QControl” for national customers?</p> <p><i>Third bullet:</i> Please promptly provide the student guide for QControl. Qwest refers to an improved CEMR/MEDIACC release, but Qwest has not yet demonstrated the replacement system will be an improvement. The preliminary timeline</p>	<p>The CEMR GUI will continue to be used and an interface will be established to MTG.</p> <p>The QPortal Platform is no longer a part of the MTG</p>
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		<p>provided in the February CMP meeting (and revised in March) is inadequate. See Row 2(c), second bullet.</p> <p><i>Fourth bullet:</i> See comment/question re. first bullet.</p>	<p>development project.</p>
<p>c. Qwest first initiated its Change Request (CR) in 2008, and it was five months into the process before Qwest deferred its CR. Qwest said in CMP that the reason more information is not available at this point, even though Qwest was five months into the process previously, was because under the earlier CR Qwest was building a new solution, and now Qwest is using an existing solution (QPortal, a Qwest affiliate system). If Qwest is not using the existing solution (Qwest Portal), please explain why more information is not available this far into the process, given the work previously performed by Qwest before it deferred its CR.</p>	<ul style="list-style-type: none"> As discussed in the February CMP meeting, the prior solution was to build from scratch a replacement system, which was determined to be time consuming and costly. The new approach is to add existing CEMR/MEDIACC functionality to existing systems for stability and ease of implementation. CEMR functionality will be added to the QPortal platform, and existing portal external customers use in the OOR/National business to access customer information. QPortal is a stable and user friendly web-based portal utilized by thousands of customers today. MEDIACC functionality will be added to the Qwest customer ticketing Gateway which is currently used by BMG customers to communicate repair information in an app-to-app environment. 	<p><i>First bullet:</i> Although Qwest refers to QPortal as an “existing” system, QPortal is not the existing system used for CLEC repair purposes. The existing system is CEMR/MEDIACC. Qwest is using “existing” to mean a platform that Qwest is familiar with due to Qwest’s use of the platform for other purposes. Qwest admitted on the March 16, 2011 that MTG is a new system, which Qwest happens to plan to place on its QPortal platform. Qwest refers to “BMG customers.” What does BMG stand for? By indicating that such customers communicate repair information in an “app-to-app” environment,” Qwest suggests that no customers communicate repair information via QPortal in a GUI environment (<i>e.g.</i>, CEMR). Please indicate if QPortal is used to communicate information currently in a GUI environment. Although Qwest suggests here that QPortal works today, in response to 2(b) above</p>	<p>The CEMR GUI will continue to be used and an interface will be established to MTG.</p> <p>The QPortal Platform is no longer a part of the MTG development project.</p>

	<ul style="list-style-type: none"> The preliminary timeline of the current project was provided in the presentation provided in the February CMP meeting, and it is also posted as part of this Qwest response to comments. The timeline indicates that requirements were just completed, design is just starting. Information available at the end of the requirements phase was also provided in this presentation. More information will be forthcoming as the project progresses, also as noted in the preliminary timeline. 	<p>(third bullet), Qwest admitted: “the functionality described in the QControl student guide only describes functionality in existence today, and does not yet include functionality for the replacement systems. Therefore, the QControl student guide would be an example of how the current system works, but would not represent any functionality for the . . . CEMR/MEDIACC release at this time.” Qwest has no experience providing the functionality of CEMR/MEDIACC via QPortal at this time.</p> <p><i>Second bullet:</i> The preliminary timeline is inadequate. For CEMR (GUI) users, such as Integra, for example, Qwest’s revised (March) timeline states that CLECs do not receive the draft release notes until November 15, 2011. Only <i>one month</i> later (with the Thanksgiving holiday occurring during that month), on December 12, 2011, the “System . . . Available to CLECs” and Qwest is to “Begin Scheduling Migration Dates.” One short month is too little time to review functionality, raise issues, receive responses, <i>etc.</i> To begin migration is basically to begin</p>	<p>See Qwest Response to Row 2.a above.</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.)</p>
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		<p>retirement/replacement, and Qwest's timeframes are not consistent with the merger settlement agreement. (See Row 2f.) Also, Qwest needs to promptly clarify why there are two deadlines on December 12, 2011. Is one (<i>e.g.</i>, System Available to CLECs) for CEMR users and the other (<i>e.g.</i>, Begin Scheduling Migration Dates) for MEDIACC users (or vice versa)? Integra does not agree to these deadlines and does not agree, for example, to use or migrate to the new system as of December 12, 2011 (or any other date inconsistent with the merger settlement agreements). Qwest needs to establish that it will fully meet its obligation to "use and offer" CEMR, with no loss of functionality or wholesale performance (see merger paragraphs 11 and 12), for the full time period required by the settlement agreements. Resources cannot be diverted to the detriment of CEMR because of Qwest's choice to implement a new system earlier. If Qwest is claiming that it is unable to meet its obligation for the full time period, then Qwest cannot rely on CMP only but also must deal with obtaining agreement and any needed approvals. See</p>	<p>As previously stated, the CEMR application will continue to be used for the full time period required by the settlement agreements.</p>
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		Section 4.	
d. Has Qwest determined the Industry Standard or Specifications it will be using for the Network testing transactions? Per a February 2 nd Qwest email, Network Testing Transaction specifications were not yet identified. But, that distinction was no longer made in the slide presentation on Feb 16 th , 2011. If available, please provide this information.	Please see ATIS-0300002 XML Schema Interface for POTS Service Test.	Why is Qwest referring to a “POTS” test? Qwest considers UNEs to be “design” services, not POTS. Please provide the referenced document (or a URL for the referenced document).	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.
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)?	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.	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	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

		<p>can rewrite the application for its purpose, why can't Qwest 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>unsupported software on new hardware does not 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</p>
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			<p>placed/converted into the new system? If so, how? If not, how is historical information retrieved?</p> <p>Response: There will be no need to convert data until MEDIACC is retired. If a customer chooses to move to MTG, their data will be created in the system.</p> <p>6. Does the “newer database” include both Qwest and CenturyLink data?</p> <p>Response: MTG will include legacy Qwest data. We have made no definitive decision to include legacy CenturyLink data.</p> <p>7. If Qwest can rewrite the application for its purpose, why can’t Qwest rewrite the application for the current database?</p> <p>Response: Please see our discussion above regarding the unsupported database.</p> <p>8. Qwest mentions only</p>
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			<p>MEDIACC. What about CEMR?</p> <p>Response: CEMR is staying in place.</p> <p>9. Please explain all reasons for the assertions in Qwest’s response.</p> <p>Response: Please see responses.</p>
<p>f. Has Qwest notified the Wireline Competition Bureau of the FCC and the state commissions of its plan to replace CEMR/MEDIACC and, if not, does it plan to do so and when?</p>	<p>Qwest has no obligation to do so.</p>	<p>Integra disagrees. See also Row 1(f). Qwest cites nothing to support its position, despite repeated requests from Integra for Qwest to provide citations/support. CEMR and MEDIACC are legacy Qwest OSS. The Qwest-Integra merger settlement agreement (paragraph 12) requires Qwest to both <i>use</i> and offer legacy Qwest OSS for a two year period (thirty months per the Joint CLEC agreement). The 450-day period described by Qwest in Row 1(f) falls far short of this time period. Although Qwest mentions the possibility of another 12 months, Qwest does not guarantee it and, in any event, this is not the time period in approved agreements. (Even with a 12-month addition, Qwest falls short of the 30 months to which it recently committed.)</p>	<p>The CEMR GUI is staying in place. All of the functionality currently present in CEMR will be present when MTG is implemented.</p> <p>The eventual retirement of MEDIACC will be done according to the requirements agreed to in the merger settlement agreements. While Qwest and Integra may still disagree whether the initial installation and use of MTG is implicated in those merger settlements, Qwest will comply with the applicable commitments during any retirement process for MEDIACC. In</p>

		<p>Integra does not agree to a shorter time period, and Qwest may not unilaterally modify Commission-approved agreements. Qwest cannot retire them before the allotted time period, and after that period, Qwest must provide the detailed plan to the FCC, state commissions, and parties. There is no provision in the merger settlement agreements allowing Qwest to replace or integrate these legacy Qwest OSS without providing a detailed plan to the FCC and affected state commissions at least 270 days before replacing or integrating Qwest OSS per paragraph 12a of the merger settlement agreement. Even assuming Qwest were to negotiate and obtain approval of a shorter time period for CEMR/MEDIACC (which to date Qwest has not done), Qwest would still have to comply with merger paragraph 12(a) whenever it does replace or integrate these legacy Qwest OSS. Integra's request that Qwest indicate when it will provide the required detailed plan to the FCC and affected state commissions is ongoing.</p>	<p>addition, Qwest will continue to strive to share as much information as practical with CLECs in order to ensure that all parties understand the impacts and that data integrity will be maintained.</p>
<p>g. What is Qwest's plan to ensure that data integrity is maintained?</p>	<p>Qwest will test this enhanced system to ensure data integrity, prior to implementation, and CLECs will have the</p>	<p>Qwest's short answer, with no details, provides no comfort that data integrity will be maintained.</p>	<p>The eventual retirement of MEDIACC will be done according to the</p>

	<p>opportunity to run in parallel, per the requirements of the CMP process, to ensure data integrity has been maintained in the transition.</p>	<p>Qwest argued in the merger proceedings that CMP procedures alone were sufficient; CLECs opposed that position; and, to resolve this issue, Qwest agreed to the merger settlement terms, which require steps in addition to CMP compliance to replace or integrate any legacy Qwest OSS. Qwest is arguing its previous CMP-only position while omitting any reference to the procedures in paragraph 12 and subparts of the Qwest-Integra merger settlement agreement. (See Rows 1(f) and 2(f) above.) The deal that was struck was that participating CLECs would have a say in the replacement or retirement of legacy Qwest OSS and that replacement/ retirement would not proceed without that say, including a majority vote in CMP. The merger agreement procedures are supposed to help ensure that data integrity is maintained. See also Row 2(e).</p>	<p>requirements agreed to in the merger settlement agreements. While Qwest and Integra may still disagree whether the initial installation and use of MTG is implicated in those merger settlements, Qwest will comply with the applicable commitments during any retirement process for MEDIACC. In addition, Qwest will continue to strive to share as much information as practical with CLECs in order to ensure that all parties understand the impacts and that data integrity will be maintained.</p>
<p>h. Does Qwest have contingency plans in the event Qwest encounters any significant problem with the planned transition to MTG and, if so, what are they?</p>	<p>CEMR/MEDIACC and the improved system will be running in parallel until the improved system has been validated.</p>	<p>Qwest refers to an “improved” system, but Qwest has not provided any support indicating the new system will be an improvement. Qwest also fails to define “validated.” Qwest’s contingency plan is limited solely to running CEMR/MEDIACC and the new</p>	<p>By maintaining MEDIACC in parallel with MTG, Qwest believes it is ensuring that a contingency exists. As discussed above, Qwest’s commitments under the merger settlement agreements will be kept</p>

		<p>system at the same time, though Qwest has not committed to doing so for the entire OSS time period identified in the merger settlement agreements. If that is incorrect, please provide the correct information.</p>	<p>with respect to the eventual retirement of MEDIACC.</p>
<p>i. Please describe all testing of MTG that Qwest anticipates will occur and indicate when that testing will occur. It was unclear, but there was some suggestion in CMP that the schedule may slip. If the schedule proposed by Qwest in its CMP notice is changing, please provide the new proposed schedule.</p>	<ul style="list-style-type: none"> As mentioned in the CMP meeting, requirements were just completed in mid-February, and the system design phase of the project started this month, so test plans are not completed at this time. Qwest system testing will occur in the development phase of the project, the timeframe for which is included in the presentation provided in the February CMP meeting and posted in conjunction with this response to comments. Additionally, once the system becomes available, CLECs will have the opportunity to run parallel and test all functionality. Also, testing of the app-to-app functionality will be available for a month prior to initial implementation, as noted in the preliminary timeline provided in the presentation. 	<p><i>First bullet:</i> Qwest is allowing itself the time it needs without accommodating CLECs' needs. A month is too short, for example. (See Row 2(c), second bullet.) Under Qwest's revised (March) timeframe, Qwest still plans to implement MTG less than two years (or 30 months) after the Closing Date, in December of 2011, and Qwest suggested in Row 1(f) that it intends to attempt to "migrate off" all users before the expiration of that time period (<i>i.e.</i>, to in effect replace CEMR/MEDIACC early and without using the procedures of the Qwest-CenturyLink-Integra merger settlement agreement paragraph 12). This is true even though CenturyLink's witness testified, for example: "Wholesale customers in CenturyLink areas and in Qwest areas, therefore, will not face immediate changes to their existing operations with the merged affiliates. CenturyLink and Qwest recognize that any</p>	<p><i>As required by CMP in Section 11.0, Qwest will be scheduling</i> joint planning sessions to determine:</p> <ul style="list-style-type: none"> Connectivity (required) Progression Testing (required) Controlled Production Testing (required) Production Turn-up (required) A test schedule (required) that reflects agreed upon dates for phases <p>A joint CLEC-Qwest test plan may also include some or all of the following based on type of testing requested:</p> <ul style="list-style-type: none"> Requirements Review Test Data Development <p>Qwest will communicate any agreed upon changes to the test schedule. CLECs are responsible for establishing and maintaining connectivity to</p>

	<ul style="list-style-type: none"> Please see the preliminary timeline for testing dates. In order to provide a high quality software product to the CLEC, Qwest reserves the right to change the schedule to accommodate any development schedule changes. Any changes to the preliminary schedule will be provided in the monthly CMP meeting. 	<p>future changes will require significant advance planning by wholesale customers, and CenturyLink pledges to give its CLEC customers ample and adequate notice of any future changes in compliance with all rules and terms of the interconnection agreements, applicable law and accepted business practices.” (Mr. Hunsucker MN Surrebuttal, p. 4, lines 5-12.) The approved merger agreement is one such applicable law. Paragraph 12(c)(i) of the Qwest-Integra merger settlement agreement provides (with emphasis added) that the “replacement or retirement of a Qwest OSS Interface may not occur without sufficient acceptance of the replacement interface by CLECs to help assure that the replacement interface provides the level of wholesale service quality provided by Qwest prior to the Closing Date.”</p> <p><i>Second bullet:</i> The preliminary timeline is inadequate. See comments regarding the previous bullet and Row 2(c), second bullet.</p>	<p>the CTE.</p> <p><i>Please refer to new timeline as provided in the June 15, 2011 CMP meeting.</i></p>
<p>j. At what point in time (e.g., at the time of retirement, or after two years), will Qwest provide</p>	<p>Acceptance of the new interface will occur according to existing CMP/software development processes. The preliminary</p>	<p>Qwest does not answer the questions asked. Integra provided two scenarios, and</p>	<p>Please refer to the MTG schedule issued on the June 15, 2011 CMP call.</p>

<p>for sufficient acceptance of the replacement interface (MTG) by CLECs to help assure that the replacement interface provides the needed level of service quality (including developing acceptance criteria, testing until the criteria are met, and a majority vote in CMP)? Please describe the timing of these events: (1) in the event that Qwest retires CEMR/MEDIACC in less than two years, and (2) in the event Qwest implements MTG earlier but retires CEMR/MEDIACC after two years.</p>	<p>timeline was provided in the presentation in the February CMP meeting and is posted as part of this response to comments</p>	<p>Qwest did not address either one. Qwest’s silence indicates that, with respect to the “replacement interface” for CEMR/MEDIACC, Qwest never intends to perform the testing described in paragraph 12(c)(i) of the merger settlement agreement (see Rows 1(f), 2(f), and 2(i)). Please let us know if this is incorrect. If incorrect, please address the timing of the acceptance testing and specifically respond to the questions asked by Integra.</p>	<p>Qwest does not have specific details regarding acceptance testing, but, as discussed above, Qwest’s commitments under the merger settlement agreements will be kept with respect to the eventual retirement of MEDIACC.</p>
<p>k. Please describe what training and education on MTG Qwest plans to provide and when Qwest will provide it.</p>	<p>As mentioned in the February CMP meeting, and documented in the presentation provided at that meeting, training and education of the new interface will be provided according to the preliminary timeline provided, currently tracking in the late August timeframe. The delivery method of the training will be determined by overall needs and availability, i.e. web, instructor, or conf call based on demand.</p>	<p>Qwest does not answer the question asked. Qwest lists potential options, but commits to none. The preliminary timeline is inadequate. (See Row 2(c), second bullet.) Qwest appears to have no current plan as to training and education on MTG, though it is required by merger agreement paragraph 12(c)(iii). Please let us know if that is an incorrect statement of Qwest’s current plan. If incorrect, please describe the training and education and its timing.</p>	<p>As long as CLECs continue to use CEMR and MEDIACC, there will be no changes. To the extent there are any future changes to CEMR, such changes will follow CMP. Re-training should not be required.</p> <p>In a B2B implementation, the education is provided via a technical specification. As a B2B interface, information regarding MTG will be contained in technical specifications which were included on the new schedule published in</p>

			<p>CMP on June 15, 2011. Information will be given on how to adapt to the interface, for example, as discussed on the June 8, 2011 call with the CLECs.</p>
<p>I. Does the company's desire to replace CEMR/MEDIACC with MTG relate to the company's plans post-merger? Is the merged company moving to MTG? If not, will CLECs have to move to MTG and move again? Integra understands that Embarq's repair system (WebRSS) cannot be used after the billing integration and that CenturyLink's other entities basically use manual processes (calling in repairs by phone). Please confirm if that understanding is incorrect, and if incorrect, please let us know what repair systems are used by the merging entities.</p>	<ul style="list-style-type: none"> The replacement of the CEMR/MEDIACC software has been under review at Qwest since 2008, due to the age of the hardware, operating system database, software and standards used. The current iteration of the replacement project was initiated in response to IT information the system had reached end of useful life and needed to be replaced. Efforts are underway to review all systems to determine systems that will be used going forward. Information on future systems will be shared as it becomes available. Qwest suggests that questions related to CenturyLink or Embarq repair systems or processes be directed to CenturyLink, as Qwest cannot claim to know Century Link systems or processes as well as they do. 	<p><i>First bullet:</i> If Qwest's response is accurate, Qwest could and should have brought its Change Request ("CR") out of deferment earlier. If Qwest's response is accurate, Qwest was fully aware of the alleged CEMR/MEDIACC issues at the time it negotiated and signed the merger settlement agreement, but Qwest did not raise the issue, request any language to address the issue, or request any exception to paragraph 12 and subparts for repair (unlike the billing-specific language in paragraph 12d). Qwest waited until just after the settlement agreement was signed. Integra's settlement agreement was filed on Nov. 8, 2010, and Qwest re-introduced its CR on Nov. 10, 2010.</p> <p><i>Second bullet:</i> Integra has asked the same questions of both Qwest and CenturyLink, and Integra's questions to both companies are ongoing. If any information provided by Qwest differs if CenturyLink is</p>	<p>It is anticipated that MTG will eventually be a system adopted for all CenturyLink CLECs but a final decision on this issue has not yet been made.</p> <p>Questions about Embarq and other CenturyLink's legacy systems are not relevant to this CR discussion.</p> <p>MTG is ultimately intended to replace the legacy Qwest MEDIACC system. This project has nothing to do with merger integration. The timing of the replacement will be consistent with Qwest/CenturyLink's merger commitments as per the schedule that was published on June 15, 2011.</p>

		<p>answering the question, or after the merger closing, the company needs to promptly revise and update its responses, and its timeline, accordingly. By suggesting that Qwest is unfamiliar with Centurylink repair, it appears that Qwest is admitting that it made its decision to replace CEMR/MEDIACC without regard to whether CLECs would need to move and move again. Please let us know if that is incorrect. If the company's decision results in CLECs moving and moving again, the company should indicate whether it intends to compensate CLECs for the adverse consequences of the company's decision.</p>	
<p>m. Provide any other reasons, with supporting documentation, for implementing MTG at this time, for the manner in which Qwest is implementing it, and for why more information is not available at this time (and address when it will be available).</p>	<p>As discussed in the February CMP meeting, and documented in the preliminary timeline in the presentation provided for that meeting, the project has just completed the requirements phase and has just entered the design phase. As the design phase is completed, more detail will become available, as itemized in the preliminary timeline provided in the presentation at that meeting. A copy of the presentation is posted as part of this response to comments. The preliminary timeline is on slide 4.</p>	<p>The preliminary revised (March) timeline is inadequate. See Row 2(c), second bullet. As indicated in the previous Rows, there is information that Qwest should be in a position to provide at this time that Qwest has not provided. Qwest is allowing itself whatever time it needs to gather and provide information, while limiting the timeframes applicable to CLECs. Qwest's "full speed ahead" approach does not make sense, given that Qwest claims it does not yet</p>	<p>Please reference the new timeline for MTG as shared in the June 15, 2011 CMP meeting.</p>

		<p>even know needed information, and Qwest is not acting consistent with the merger settlement agreement terms. If Qwest wants to obtain flexibility as to those terms for CEMR/MEDIACC (due to alleged extenuating circumstances), then Qwest needs to work more collaboratively with CLECs and needs to fully address the questions identified in Section 4 below.</p>	
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3. Functionality of New System (MTG) After Implementation. We need a detailed understanding of the relative functionality of MTG to CEMR/MEDIACC. If Qwest believes that MTG is a more favorable system, then Qwest should provide specific information to persuade CLECs of the reasons to move to MTG at this time.

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
<p>a. Qwest described different functionalities for the existing (CEMR/MEDIACC) and proposed replacement (MTG) repair interface systems. (PP, pp. 5-10.) Although Qwest said that no functionality will be lost, Qwest needs to provide detailed information in advance to verify that is the case. Learning after the fact that functionality has been lost is too late.</p>	<p>The requirements for the improved system have derived from the existing CEMR/MEDIACC functionality. The system will be evaluated via formal testing against these requirements.</p>	<p>Qwest’s two-sentence reply does not constitute the requested “detailed information.” Qwest’s response is in the past tense (“have derived”). If they have been derived, then Qwest should be able to provide them. As indicated in Row 2(b) (first bullet), Qwest should have been able to answer questions about functionality of the new system, based on functionality of the existing system, during the March 16, 2011 CMP meeting, but Qwest could not answer those questions.</p>	<p>Qwest confirms that the existing functionality in MEDIACC will be included in MTG as discussed on the February 16, 2011 CMP meeting and subsequent meetings.</p> <p>The planned design reviews will allow CLEC SMEs to review and understand the planned functionality of MTG and compare it with existing MEDIACC functionality to evaluate and confirm that no functionality will be lost.</p>
<p>b. When describing the products that the GUI (CEMR) supports currently, the Qwest presentation includes only POTS, Voicemail and Broadband and does not include designed services. (PP, p. 6.) Please confirm that MTG GUI will allow repair ticket submission for all CLEC</p>	<p>All functions for design services that exist in the current CEMR/MEDIACC system will be included in the improved system. Designed Services will be included, and are detailed in slide 7 of the presentation posted associated with this response. This information was inadvertently omitted in the February CMP meeting copy of the presentation.</p>	<p>Qwest refers to the new system as “improved,” but Qwest has not demonstrated that the new system will be equal or improved. Qwest did not go over a revised presentation at the March 16, 2011 CMP meeting. On slide 7 of its posted March presentation, Qwest identifies</p>	<p>See Qwest Response to Row 3.a above.</p> <p>The CEMR GUI is staying in place. All of the functionality currently present in CEMR will be present when MTG is implemented. The CEMR</p>

<p>products and services, including the services that Qwest refers to as “design” services.</p>		<p>functions that exist with CEMR and that Qwest indicates will exist with MTG, but Qwest calls the latter “improvements.” Qwest does not explain how maintaining a functionality by imposing the time and expense of changing systems upon CLECs is an “improvement.”</p>	<p>GUI is the system that has been upgraded as noted previously. Qwest is still concerned about the stability of MEDIACC.</p> <p>CLECs will have the option to use CEMR with MEDIACC or MTG.</p> <p>MTG and MEDIACC will both be in operation for some time as per the MTG Timeline issued on June 15, 2011.</p>
<p>c. For each function listed in the Qwest CEMR User Guide, provide a status on whether MTG will have the function upon implementation and whether there are any changes to the manner and timing in which the CLEC performs the function or receives information. For example, under the section Prevalidation in the CEMR User Guide, there is a function titled “Viewing Facility Information.” Compare CEMR to MTG as to this functionality, address:</p> <ul style="list-style-type: none"> • Will MTG allow CLEC to view facility information? • Will the CLEC input the 	<p>The requirements for the improved system have derived from the existing CEMR/MEDIACC functionality. While the look and feel of the improved GUI may be slightly varied from CEMR, existing query capabilities will be maintained. The presentation provided in the February CMP meeting describes the functionality that will be provided. It is posted as part of this response to comments.</p>	<p>CLEC is concerned about Qwest’s statement that the “look and feel” of MTG may be different from CEMR. CLEC does not agree to these difference(s). As the debate about functionality in the merger dockets show, CLECs and the Joint Applicants have different views as to functionality, and what Qwest and CenturyLink have said is the same functionality is not always in CLECs’ view the same functionality. CLEC does not agree that the types of changes that Qwest is describing are “slight” variations.</p>	<p>In response to all of the bulleted questions, to be clear, the CEMR GUI is staying in place. All of the functionality currently present in CEMR will be present when MTG is implemented.</p>

<p>same information to obtain this data as it does today with CEMR?</p> <ul style="list-style-type: none"> • Will the information that MTG provides for this function be the same data, presented in the same manner? • Will the response time be the same or better than the response time in CEMR? • Will MTG change existing field auto-population? • Will MTG change the availability of existing pull down menus? • Will MTG change existing query options? 		<p>Qwest did not answer the questions posed by Integra. The answers to these specific questions are not in the February presentation (or the revised March version). Integra’s requests for responses from Qwest and CenturyLink to each and every one of these questions is ongoing. Please respond.</p>	
<p>d. Please provide the answers to questions 1-4 above as to all functions listed in the Qwest CEMR User Guide.</p>	<p>Please see response above.</p>	<p>Qwest did not answer the questions posed by Integra. The answers to these specific questions are not in the February presentation (or the revised March version). Integra’s requests for responses from Qwest and CenturyLink to each and every one of these questions is ongoing. Please respond.</p>	<p>The CEMR GUI is staying in place. All of the functionality currently present in CEMR will be present when MTG is implemented. CLECs will have the option to use CEMR with MEDIACC or MTG.</p> <p>MTG and MEDIACC will both be in operation for some time as per the MTG Timeline issued on June 15, 2011.</p>
<p>e. Please describe access and</p>	<p>Qwest will provide system access detail</p>	<p>As indicated, Qwest’s “full</p>	

<p>level of access to the new system that will be available to CLEC.</p>	<p>when available, but as mentioned in the February CMP meeting and detailed in the preliminary timeline provided in the presentation for that meeting, system design has just started and so that information has not been created at this time.</p>	<p>speed ahead” approach does not make sense in view of Qwest’s claims that Qwest itself lacks needed information. Qwest has built insufficient time into its timeline for CLECs to review, respond to, and prepare for any changes. If CLECs point out differences in functionality, there is no time in the schedule for Qwest to add that functionality before implementation, <i>etc.</i></p>	<p>System access for CEMR and MEDIACC will remain in place as it is today. System access for MTG will be documented as a part of the on boarding process which normally takes place just before a CLEC begins testing a B2B interface. This step is not normally included in a timeline as this step is CLEC specific.</p>
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4. Relationship to Merger Agreement and Other Legal Issues. We anticipate that Qwest legal will also respond separately regarding the legal/regulatory issues.

INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
<p>a. In written CMP comments and on CMP calls, Qwest directed all questions or comments associated with the planned implementation and timeline for MTG in regard to the Merger Settlement Agreement executed by Qwest, CenturyLink and Integra should be referred to the Qwest or CenturyLink Legal Departments. Therefore, Integra contacted the Qwest and CenturyLink legal folks with questions and looks forward to their response.</p>	<p>This question is outside of the scope of CMP.</p>	<p>Integra has posed its questions not only in CMP but also to both Qwest and CenturyLink executives and Qwest and CenturyLink legal personnel. No one at Qwest or CenturyLink has answered them. Integra’s requests are ongoing. The company has to address each OSS and wholesale quality paragraph of the merger settlement agreement and when and how the company will comply with each provision with respect to repair OSS (CEMR/MEDIACC/MTG). If Qwest believes any questions</p>	<p>As discussed above, Qwest/CenturyLink’s commitments under the merger settlement agreements will be kept with respect to the eventual retirement of MEDIACC. Qwest continues to disagree that the installation and use of MTG internally within Qwest raises any issues regarding the merger settlement agreements.</p>

		are outside the scope of CMP, then someone else at Qwest and CenturyLink as to answer them. Please respond.	
b. CLECs using CEMR/MEDIACC need detailed information, and CMP allows a forum for Qwest to provide that information at a detailed level with operational personnel who participate in CMP. These issues are important for Integra, and not having received sufficient information in CMP to date, Integra has also separately contacted Qwest to attempt to receive more detailed information. Integra anticipates that the details will be shared with all parties who need it.	<ul style="list-style-type: none"> • A preliminary timeline of the project and availability of documentation and training are provided in the presentation provided at the February CMP meeting and has also been posted as part of this response to comments. • If there are specific questions that Integra would like to state, please forward them. Answers will be provided as soon as they are available, but as noted in the preliminary timeline, the system design and development is not yet complete, which precludes answers to many questions at this time. As indicated previously, the timeline for system design and development is noted in the preliminary timeline. 	<p><i>First bullet:</i> The preliminary timeline is inadequate. See Row 2(c), second bullet. Qwest needs to be forthcoming with more information and work in a more collaborative manner, if the proposed changes are to move forward, which they cannot do as proposed by Qwest, per the merger settlement agreements (see, e.g., Rows 1f and 2f above).</p> <p><i>Second bullet:</i> Integra has already forward specific questions, but as indicated in the other Rows in this column, Qwest has not answered them completely and in some cases not at all. The preliminary timeline is inadequate. Qwest cannot answer basic questions at this time, yet Qwest is unyielding as the short timeframes that it will then impose on CLECs. The preliminary timeline provides too little detail.</p>	Qwest will continue to provide information to CLECs as soon as is practical and continues to view this process as a collaborative process that seeks CLEC input for consideration and potential implementation. Qwest will answer any questions once it has the information necessary with which to answer the question.
c. Qwest needs to address how a solution, even if agreed upon operationally by all impacted CLECs, will be addressed with	Questions regarding the merger agreements are outside of the scope of CMP.	Integra has posed these questions not only in CMP but also to both Qwest and CenturyLink executives and	As discussed above, Qwest's commitments under the merger settlement agreements will be kept with

<p>respect to the merger agreements and orders. To some extent, this issue has left the hands of any one party, as settlement agreements have been approved/incorporated in state commission orders, and other CLECs have opted in to the Integra agreement. Integra intends to comply with its agreement and the commission orders, and Integra would be concerned about any resolution that is inconsistent with the filed agreements and commission orders. If Qwest has a plan to address how these issues would be dealt with and brought to regulators as needed, please share that plan.</p>		<p>Qwest and CenturyLink legal personnel. No one at Qwest or CenturyLink has answered them. Integra's requests are ongoing. If Qwest believes any questions are outside the scope of CMP, then someone else at Qwest and CenturyLink has to answer them. Please respond. Regarding the "additional 12 months" mentioned by Qwest in Row 2f (second bullet) and 5a (second bullet), please provide citations to any support for the 12 months referenced by Qwest. Where does the 12 months come from? Is Qwest unilaterally re-writing the timeframes in the merger settlement agreements after the fact? Does Qwest plan to comply with the provisions of merger paragraphs 12a and 12c after that additional 12 month period but before retiring or replacing CEMR/MEDIACC? If Qwest is making a new offer, to modify the timeframes in the settlement agreements, please make this clear and then Qwest needs to obtain CLEC agreement (which Qwest does not have at this time) and circle back to the regulators who approved those</p>	<p>respect to the eventual retirement of MEDIACC. Qwest has not yet developed a specific plan for each component, but does intend to abide by its commitments.</p>
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		agreements. If Qwest and/or CenturyLink has a plan to address how these issues would be dealt with and brought to regulators as needed, please share that plan.	
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5. Change Management Process (CMP). We have requested that Qwest take certain actions in CMP. Please let us know if Qwest will take these actions and, if not, what course Qwest will follow.			
INTEGRA 2/2/011	QWEST 3/10/11	INTEGRA REPLY 3/18/11	QWEST 6/30/11
a. Withdraw Qwest’s CR to retire MEDIACC for at least 2 years.	<ul style="list-style-type: none"> As stated in the February CMP call, Qwest did agree to place the MEDIACC retirement CR in a Deferred status until after the implementation of MTG, at which point Qwest will evaluate the transition of customers to MTG and working with the CLECs will determine next steps for retirement of both CEMR and MEDIACC. The deferment of the CEMR/MEDIACC CR occurred the week of February 28. To clarify: by deferring the MEDIACC CR until post implementation, the timeline for CEMR/MEDIACC retirements based on CMP requirements would be over 450 days from today. In addition to the 450 days, Qwest will work with each CLEC to ensure a successful migration to the new interface, whether GUI or app-to-app, prior to 	<p><i>First bullet:</i> Qwest over-states Qwest’s statements on the February CMP call. As reflected in the Qwest-prepared meeting minutes from that call, Qwest said it “may” place the MEDIACC CR in a Deferred status, and Qwest did not commit on the call to any time period for the length of the deferment. A deferment occurs when Qwest changes the status in the CR Detail on its website, and that did not occur until March.</p> <p><i>Second bullet (except last sentence):</i> Deferring the MEDIACC CR as described by Qwest is not fully documented and does not satisfy the terms of the Qwest-</p>	<p>The MEDIACC Retirement CR SCR121608-01 was placed in pending withdrawal status by Qwest on May 13, 2011 and then officially withdrawn in the May 2011 CMP monthly meeting.</p> <p>Qwest/CenturyLink intends to comply with its merger settlement agreements.</p>

	<p>any retirement, including an additional 12 months on top of the CMP requirement if necessary.</p>	<p>CenturyLink-CLEC merger settlement agreements. Qwest appears to be creating its own process and own timeline (potential “additional 12 months”), but Qwest is required to adhere to the processes outlined in the settlement agreements. If CLECs cannot rely upon the timeframes in the merger settlement agreements, how can CLECs rely on the 450-day or 12-month claim? (Regarding the “12 months,” see Row 4c.) Additionally, does deferring the MEDIACC CR until post-implementation of a new system (MTG) cause the timeline changes that Qwest describes in its second bullet point, even if Qwest defers rather than withdraws its CR? An electronic search of the CMP Document shows there is no reference to “450,” so presumably Qwest selected and added together other timeframes, if Qwest is using the CMP Document. Please provide citations to the sections of the CMP Document supporting the 450-day time period and show how Qwest has calculated it. CLECs do not know at this time how Qwest may later</p>	
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	<p>Qwest reserves the right under CMP requirements to request an earlier retirement of any application in the event all users have migrated off the old application.</p> <ul style="list-style-type: none"> • Once the improved system becomes 	<p>claim a deferment affects the timeline. Specifically state how Qwest calculated the start of the 450-day period and whether it takes into account any activity to date (given that Qwest is deferring a CR and not initiating a new CR, as requested). When Qwest states that it will work with CLECs, does this include, for example, a majority vote of participants in CMP? It does not appear so, because Qwest refers to working with “each CLEC.” Please address when a majority vote in CMP will occur before retirement/replacement of CEMR/MEDIACC. Paragraph 12(c)(i) of the approved Qwest-Integra merger settlement agreement provides (with emphasis added) that the “replacement or retirement of a Qwest OSS Interface <i>may not occur</i> without sufficient acceptance <i>of the replacement interface</i> by CLECs to help assure that the replacement interface provides the level of wholesale service quality provided by Qwest prior to the Closing Date.” There is no exception such as if CLECs have migrated off of a</p>	
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	<p>available and is proven in testing with CLECS to provide full functionality, Qwest will measure PID/PAP performance based upon the new improved system.</p>	<p>particular system earlier. According to its statement in Row 2(1), Qwest has been reviewing this issue since 2008, but Qwest requested and received no exception to paragraph 12 before Qwest executed the merger settlement agreement. Per Paragraph 12, Qwest must continue to use and offer, and can never retire or replace, CEMR and MEDIACC if Qwest does not comply with the commission-approved merger agreement procedures. Therefore, Qwest needs to answer Integra's repeated question as to the timing of when Qwest will take each step outlined in paragraph 12. Integra needs this information to plan for its own business needs.</p> <p><i>Second bullet (last sentence):</i> Qwest does not have the right it claims to be reserving. Qwest's commitments in the merger agreements include but also add to CMP requirements. There is a saying about seeking forgiveness rather than permission. That is not an acceptable approach here. These issues need to be dealt</p>	<p>Under Section 9.1.1 and 9.2.1, Qwest continues to reserve the right under CMP to request an earlier retirement of any application in the event all users have migrated off the old application.</p>
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		<p>with in advance and not after the fact. In fact, CLECs believe they <i>have</i> been dealt with, via the merger settlement agreements, and Qwest still has not explained why it is acting as though that is not the case. (See Section 4.) Qwest also fails to explain how implementing a new, replacement system and migrating all CLECs to that system is anything other than retiring and replacing the old system, except as a matter of semantics to avoid certain obligations.</p> <p><i>Third bullet:</i> Qwest refers to an “improved” system, but Qwest has not yet demonstrated that the new system will be an improvement. Qwest refers to “testing.” Qwest should perform parallel testing (old versus new) and compare the two. That way, CLECs will not have to wait until it is too late to learn whether the system replacement adversely affects wholesale performance. Will the testing conform to the requirements of paragraph 12 and subparts of the Qwest-Integra merger settlement</p>	<p>The CEMR GUI is staying in place. All of the functionality currently present in CEMR will be present when MTG is implemented. 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/CenturyLink intends to abide by the merger agreements. Please see the timeline issued on the June</p>
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		<p>agreement, as well as any longer timeframes or additional requirements in other merger settlement agreements? What steps will Qwest take to ensure that use of a new system will not change how PID/PAD data is collected, calculated, <i>etc.</i>?</p>	<p>15, 2011 CMP meeting.</p> <p>Qwest/CenturyLink's commitments under the merger settlement agreements will be kept with respect to the eventual retirement of MEDIACC. Qwest continues to disagree that the installation and use of MTG internally within Qwest raises any issues regarding the merger settlement agreements.</p>
<p>b. Withdraw Qwest's CR to implement MTG, because replacing CEMR/MEDIACC is an integral part of that CR, and</p>	<p>In reviewing the title and description of the MTG CR, there is no mention of replacement or retirement in the title. The description does contain the word replacement which will be removed through an update to the CR. At this point Qwest does not intend to withdraw the CR and re-issue.</p>	<p>Integra disagrees, and its request for Qwest to withdraw this CR is ongoing. Replacing a legacy Qwest OSS is a significant step, and yet the following is Qwest's 12/16/08 Description of Change in its entirety (with emphasis added): "Implement new repair ticketing gateway to provide XML transactions replacing ticketing functionality currently supported by MEDIACC. Expected Deliverables/Proposed Implementation Date (if applicable): Late third quarter/fourth quarter 2009.)" Since then, Qwest added (with emphasis added): "New application will include limited testing and also replace CEMR." As previously indicated, the</p>	<p>The MEDIACC Retirement CR SCR121608-01 was placed in pending withdrawal status by Qwest on May 13, 2011 and then officially withdrawn in the May 2011 CMP monthly meeting.</p>

		<p>replacement of CEMR/MEDIACC is an integral part of this CR, and the CR provides an insufficient description of the change. After Integra raised the issue of Qwest compliance with the merger settlement agreement, Qwest began to argue that it was separating the retirement of CEMR/MEDIACC from replacement with MTG. A minor wording change, after the fact (not until March 7, 2011), to the existing CR to delete the references to replacing MEDIACC is inadequate. It remains the case that Qwest intends to replace CEMR and MEDIACC with MTG, and Qwest's belated wording change does not change that reality.</p>	
<p>c. If Qwest intends to implement MTG, submit a new CR that contains a better, more detailed description.</p>	<p>Qwest will continue to provide additional information in the description of the CR for MTG as it becomes available throughout the project. Qwest does not intend to withdraw or re-submit a new CR.</p>	<p>Integra disagrees, and its request for Qwest to withdraw this CR is ongoing. See previous Row. Qwest should wait until it is prepared to provide detailed information before it proceeds with submitting a new CR. Qwest also needs to address the questions in Section 4 before it may proceed.</p>	<p>The current CR SCR121608-02 will continue to be used to support the implementation of MTG.</p>

5/23/11 email from Kim Isaacs – Integra The following questions were received from Integra following the distribution of notification SYST.MEDI.05.20.11.F.09159.Followup_Resp_Commnts_MTG which provided the partial response on MTG Vendor issues.

INTEGRA 5/23/11	QWEST 6/30/11
<p>1. Thank you for providing information on Friday via CMP notice which referenced an updated matrix. Although Qwest/CenturyLink appeared to populate the earlier matrix, the Company deleted large portions of the matrix without noting the deletions. Qwest’s March 10, 2011 Matrix contained Sections 1-5 (with bullet points in each), and Integra’s March 18, 2011 Responsive Matrix contained Sections 1(a)-(g), 2(a)-(l), 3(a)-(e), 4(a)-(c), and 5(a)-(c). The Company’s partial response contains only Sections 1(a)-(g), and an initial review indicates that information provided even to that portion is relatively limited.</p>	<p>See full matrix above. Qwest has inserted the 5/20/11 responses into the full MTG matrix. Additional information has also been included in the Qwest response column.</p>
<p>2. To date, the parties have exchanged information via the matrix. Deleting portions of the matrix without noting the deletions makes it more difficult to track the issues and may cause confusion. We ask that the Company include the entire matrix when providing responses to the matrix. For rows of the matrix that the Company does not address at the time, you may simply indicate the status or make another note, rather than deleting the row. During the last CMP call, you indicated that there were certain questions (primarily in Section 4) that would be answered by the Company’s Legal personnel. As Bonnie indicated on the call, regardless of whether CMP or Legal provides the information, we expect that the Company will distribute the responses from Legal to CLECs. All CLECs need to know how the Company will comply with the merger agreements and orders. Since the monthly CMP meeting, we have also reiterated our requests and our objections to the current timeline and inconsistencies with the merger agreements and orders to the Company’s legal personnel and executives, and await a response to CLECs.</p> <p>We will continue to review the information provided to date, though it does not answer all of our questions. Our requests for the remaining information are ongoing.</p>	<p>See full matrix above. Qwest has inserted the 5/20/11 responses into the full MTG matrix. Additional information has also been included in the Qwest response column.</p>

5/23/11 email from Karen Clauson – The following questions were received from Integra following the distribution of notification .xxx that provided the partial response on MTG Vendor issues.

INTEGRA 5/23/11	QWEST 6/30/11
<p>We appreciate the Company clarifying that one of the two Change Requests (CRs) has been moved from deferred to withdrawn status. As our emails since the Company indicated it would change that CR's status indicate, the Company's plan to nonetheless proceed with its plans means that, despite that change in status of one of the two CRs, our concerns remain unaddressed. The revised timeline that the Company posted to its website last week continues to identify a date of December 12, 2011 for: "Begin Deployment Process": "System . . . Available to CLECs"; "Begin Scheduling Migration Dates." See http://wholesalecalendar.qwestapps.com/detail/289/2011-03-16. As indicated in my email below, this timeline is inconsistent with the merger agreements and orders, and the Company's ongoing actions based on this timeline heighten our concerns.</p>	<p>As discussed above, Qwest's commitments under the merger settlement agreements will be kept with respect to the eventual retirement of MEDIACC.</p>
<p>We have been articulating our concerns since the first comment opportunity after Qwest brought its CRs out of deferment status on November 10, 2011. Available to you are CLECs' written comments in CMP, including the matrix, and our emails exchanged both in CMP and with you (see, e.g., email exchanges below). We believe we have provided ample information for you to understand and address our concerns. In response to our January 4, 2011 CMP comments, Qwest indicated on January 13, 2011 that Legal would respond. It is now nearly four months later, and the time for you to respond is overdue. You cannot expect that you can take months to respond without revising your own proposed schedule. The longer that the Company waits to make a decision and begin to work toward a modified plan, the longer its current proposed timeline will be extended. We have asked some fairly straightforward questions such as whether, if CLECs and regulators agree to a waiver of the two-year (modified to 30 month) moratorium time period, the Company would distinguish repair systems as a unique situation and would comply with all the subparts to Integra settlement agreement paragraph 12. Given that Qwest and CenturyLink signed on to those commitments last year, we should not still be waiting for a response in May to those questions. We fully expect and require a written</p>	<p>See above.</p>

<p>response from the Company to those questions.</p> <p>Your email below states: “we are still awaiting final approval from the executive committee on the replacement system, MTG. Review and approval of MTG is currently scheduled for June 6th.” You do not state what the executive committee is approving, so we don’t know whether it addresses any of our concerns. June 6th is not timely.</p>	
<p>You propose a call with Integra next week, but it is unclear what purpose a call would serve when the Company has not made a decision. As indicated, we have fully laid out our issues and are awaiting responses from you. If there are responses you can provide next week, let us know what they are. Additionally, these are issues of interest to other CLECS as well, and the consent of carriers and regulators is needed to modify commission-ordered commitments. The Company should come prepared to discuss all of these issues, including the merger conditions, in CMP. When describing such a CMP call in a notice to CLECs, the Company could indicate that, because the merger conditions will be discussed, attorneys for the carriers are encouraged to join the CMP call. Qwest has held a CMP call with additional attorney participation in the past, such as when TRRO issues were discussed on a CMP call. The alternative to CMP, given the need for more parties’ participation, is for the Company to file notices with the commissions so carriers may comment there. If the Company would like to obtain feedback before making such a filing, CMP is an available avenue for doing so.</p>	<p>See above.</p>
<p>Currently, the Company has scheduled a call in CMP regarding CEMR/MEDIACC/MTG for June 8th, but that call appears to be in furtherance of the current, objectionable timeline and non-consensus approach. It does not take into account our objections and our request for a collaborative approach to developing a plan and timeline, followed by later technical discussions based on a collaboratively-developed timeline and approach. The type of call that we are describing would be a better use for that time slot on June 8th. It would have to be a preliminary call, given that the company is required via its merger commitments to file its proposed plan with regulators and CLECs are allowed to comment there, but perhaps some idea could be gained of what may or may not be acceptable to CLECs for proposal to regulators.</p>	<p>See above.</p>

5/26/11 additional email from Kim Isaacs – Integra The following questions were received from Integra following the distribution of notification SYST.MEDI.05.20.11.F.09159.Followup_Resp_Commnts_MTG which provided the partial response on MTG Vendor issues.

INTEGRA 5/26/11	QWEST 6/30/11
<p>On the CMP call, Qwest committed to provide additional information to CLECs by the end of the day yesterday. That information is not yet posted on the Qwest website. Does Qwest still intend to provide it and, if so, when? Or, has Qwest’s plan changed and, if so, how does Qwest intend to proceed?</p> <p>Also, before the merger, Qwest had directed certain questions to CenturyLink. Now that the merger is completed, we anticipate that you will respond in CMP, perhaps when you respond to the remainder of the matrix, if not earlier; for example:</p> <p style="padding-left: 40px;">Matrix, Row 2(l): “Integra understands that Embarq’s repair system (WebRSS) cannot be used after the billing integration and that CenturyLink’s other entities basically use manual processes (calling in repairs by phone). Please confirm if that understanding is incorrect, and if incorrect, please let us know what repair systems are used by the merging entities.”</p>	<p>Questions about Embarq and other CenturyLink’s legacy systems are not relevant to this CR discussion.</p> <p>MTG is ultimately intended to replace the legacy Qwest MEDIACC system. This project has nothing to do with merger integration. The timing of the replacement will be consistent with Qwest/CenturyLink’s merger commitments as per the schedule that was published on June 15, 2011.</p>
<p>Regarding the information that Qwest provided on Friday via CMP notice, which referenced an updated partial matrix, please address the following questions regarding that information:</p> <ul style="list-style-type: none"> • The Letter for Sybase which seems to be Qwest’s basis for claiming a potential system failure is dated June of 2000 – more than ten years ago. If this is a problem, why did Qwest decide to wait 11 years to make a change? What about a ten-year-old problem makes this urgent now? Or, is this not the basis for Qwest’s request for early implementation? Is the cause of the proposed timeline the Merged Company’s plans to use MTG? • 	<p>See discussion in the CMP February 2011 System meeting minutes where Ross Rutledge discussed the Typical Electronic Component Failure Rate as a Component of Time.</p>
<ul style="list-style-type: none"> • In the Oracle information provided, we don’t find support for Qwest’s 	<p>Oracle is a component of the CEMR platform (not used</p>

<p>request. Please point more specifically to it, if there is something we missed. In any event, the information provided seems to suggest that Qwest is covered until at least 2013. If that is not the case, where in the information provided does it show something different?</p>	<p>within MEDIACC).</p> <p>The CEMR GUI is staying in place. All of the functionality currently present in CEMR will be present when MTG is implemented. The CEMR GUI is the system that has been upgraded as noted previously.</p>
<ul style="list-style-type: none"> The HP OS document (to which Qwest provided a link) does not discuss the version you are running. We do not find where it says that there is not sufficient support for Qwest's current version. If you believe it says that, please point more specifically to where it indicates that. 	<p>HP-UX-10.20: Please refer to page 3 of 15 on the following link: http://h20338.www2.hp.com/hpux11i/downloads/public_hp-ux_systems_support.pdf.</p>
<ul style="list-style-type: none"> A review of the information provided to date does not show any real difference in status from at least four years ago. Other than Qwest's merger with CenturyLink and the company's plan to use MTG, what has changed? 	<p>See discussion in the CMP February 2011 System meeting minutes where Ross Rutledge discussed the Typical Electronic Component Failure Rate as a Component of Time.</p>

6/1/11 additional email from Bonnie Johnson – Integra The following questions were received from Integra following the distribution of notification SYST.MEDI.05.20.11.F.09159.Followup_Resp_Commnts_MTG which provided the partial response on MTG Vendor issues.	
INTEGRA 6/1/11	QWEST 6/30/11
<p>Your email below raises more questions than it answers. We remain concerned that Qwest is going ahead with its repair system project despite CLEC objections and despite the merger conditions and merger Orders. Your reference to “further minimize[ing] the impact of this project on customers” heightens our concerns. While at least Qwest finally recognizes that this project is impacting the Company’s customers, your statement suggests that it is sufficient to “minimize” the impact, suggesting some impact is ok. It is not ok. If the Company were complying with the merger conditions and Orders, there would be no project and no impact or potential impact to customers, retail or wholesale. Our objections, and our request that you cease such activity and withdraw the pending CR relating to CEMR/MEDIACC/MTG, are ongoing.</p>	<p>Integra objections are noted.</p>
<p>We object to Qwest making changes “behind the scenes” without advance notice and opportunity to comment for CLECs. Whereas CenturyLink may have had a policy of not disclosing hardware or other</p>	

<p>upgrades that it unilaterally determines do not affect CLECs operationally, Qwest Corporation and thus the Merged Company in legacy Qwest territory has an obligation to follow CMP and ICA procedures for 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>Qwest notifies CLECs of scheduled maintenance activity consistent with the requirements of CMP.</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>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>
<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 	

<p>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>	<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> <p>The above tasks were done during the maintenance windows and no outage occurred during the normal production window.</p>
<p>■ Are any applications/software, including in the back-end, on different hardware now? If so, please describe.</p>	<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 -

	<p>WLS 8.X to TOMCAT (JBoss-EWS)</p> <ul style="list-style-type: none"> • 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>
<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>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>■ 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</p>	<p>See prior responses.</p>

<p>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 therefore the application needs to be rewritten to utilize a newer database.” Did the Company re-write the application to utilize a newer database? If not, was the information Qwest provided on 3/10/11 inaccurate? If the Company did re-write the application to use a newer database, please describe the newer database. Also, please address how doing so in this manner could be consistent with the CMP Document and/or the merger conditions and Orders. What is the newer database, and does it or will it contain any integrated information? Does the re-write of the application or the database have any relationship to any billing system?</p>	
<p>■ Does any aspect of the recent “upgrades” or “MTG B2B application” have any relationship to a billing integration?</p>	No
<p>■ Qwest did not respond to the following from our email below – Please respond: “Also, before the merger, Qwest had directed certain questions to CenturyLink. Now that the merger is completed, we anticipate that you will respond in CMP, perhaps when you respond to the remainder of the matrix, if not earlier; for example:</p> <ul style="list-style-type: none"> ○ Matrix, Row 2(l): ‘Integra understands that Embarq’s repair system (WebRSS) cannot be used after the billing integration and that CenturyLink’s other entities basically use manual processes (calling in repairs by phone). Please confirm if that understanding is incorrect, and if incorrect, please let us know what repair systems are used by the merging entities.’” 	See prior response.
<p>■ Does the Company’s push to implement and integrate MTG have any relationship, direct or indirect, to the Company’s merger-related activities or plans to use MTG for the merged company going forward?</p>	No. See prior responses.
<p>■ Please identify any integration of systems or data or other integration that has taken place. For example, you state below that the recent upgrades “will allow it to interface seamlessly to an MTG B2B application.” We believe that this can more accurately be described as an integration of it and MTG – even though the merger conditions do not allow integration</p>	This project has nothing to do with merger integration. MTG is ultimately

<p>during this time period. If that is incorrect, please explain why.</p>	<p>intended to replace the legacy Qwest MEDIACC system. Our actions with respect to the implementation with MTG as an alternative application are entirely consistent with the merger agreements.</p>
<ul style="list-style-type: none"> ■ 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>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>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>	<p>Our actions with respect to the implementation with MTG as an alternative application are entirely consistent with the merger agreements.</p>

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

NOTE: On June 7, 2011, CenturyLink received an email from Integra that included an attachment with questions on MTG functionality specific to QPortal. CenturyLink has not included these Integra questions or a response since QPortal is no longer a part of the MTG functionality. The attachment with the QPortal questions is available on the Wholesale calendar at <http://wholesalecalendar.qwestapps.com/detail/324/2011-06-08>.

6/9/11 additional email from Bonnie Johnson – Integra The following questions were received from Integra following the MTG ad hoc call on June 8, 2011.	
<p>On the 6/8 Ad Hoc CMP call regarding repair OSS, Qwest announced that it was no longer going to include CEMR in its MTG plans. We find that we need clarification of exactly what is/is not being withdrawn or changed. Specifically:</p> <p>1. In the 11/17/10 minutes in the Change Request (CR) Detail for CR #SCR121608-01, Qwest said that Qwest was looking at doing two things: (1) retiring CEMR and replacing it with a front Graphical User Interface (GUI), and (2) retiring MEDIACC and replacing that with an XML B2B ticketing interface (with “B2B” indicating an application-to-application interface). It appears that, after yesterday, Qwest is no longer proceeding with #1 and continuing with #2. (a) Is that correct? (b) If no, please explain.</p>	<p>As further discussed on the 6/15/11 CMP monthly meeting, Qwest no longer plans to retire the CEMR GUI application. CEMR will be able to interface with the new B2B application MTG. CEMR will also continue to interface with MEDIACC per our merger commitments. In addition, CR #SCR121608-01 to retire MEDIACC was placed in withdrawn status on May 18, 2011.</p>
<p>2. In pending CR #SCR121608-02, the “Description of Change” states that (1) Qwest will “Implement new repair ticketing gateway to provide XML transactions for ticketing functionality currently supported by MEDIACC” and (2) the “New application will . . . also replace CEMR.” It appears that, after yesterday, Qwest is proceeding with #1 but no longer continuing with #2. (a) Is that correct? (b) If no, please explain. (c) If yes, will Qwest revise the description of change accordingly?</p>	<p>Yes. Please see response to #1 above.</p> <p>As of 06/17/11, the CR #SCR121608-01 has been updated to show the 11/10/10 revision which states “New application will include limited testing and also replace CEMR” no longer applies.</p>
<p>3. On the 6/8 Ad Hoc CMP call regarding repair OSS, Qwest admitted that, although Qwest does not plan to proceed with its “front-end” GUI replacement plan, Qwest’s MTG proposed implementation would still affect the GUI (CEMR) in the “background” because “obviously each goes through MEDIACC.” We need a better understanding of what changes are being made in the background and any potential impact of the proposed changes to CEMR users and their customers.</p>	<p>The CEMR GUI application will be revised to also interface with the MTG application to application system. These updates to the CEMR GUI will not impact the CEMR online user functionality, user experience or service standards. Linkage between CEMR and Qwest’s downstream systems is transparent to CEMR users. To the extent there are any changes to CEMR, these will be communicated through CMP.</p>

6/9/11 additional email from Bonnie Johnson – Integra The following questions were received from Integra following the MTG ad hoc call on June 8, 2011.	
Please explain more fully.	
4. In the past, Qwest has explained MEDIACC as an application-to-application interface and CEMR as a GUI, with both of them pointing separately to Qwest’s back end systems. Recently, Qwest has suggested that, rather than interfacing directly with Qwest’s back-end systems, CEMR goes through MEDIACC first and then MEDIACC interfaces with Qwest’s back-end systems. (a) Is the latter how it works currently? (b) If so, how long has that been the case? (c) Was a change made (e.g., so that CEMR goes through MEDIACC instead of interfacing with the back-end systems) and, if so, please describe fully. In other words, did CEMR always point to MEDIACC or were CEMR and MEDIACC independent of each other and each interacted with Qwest back-end systems? For example, did CEMR and MEDIACC each access information from Qwest’s back-end systems previously but now CEMR connects to MEDIACC and MEDIACC accesses the information from Qwest’s back-end systems and in turn feeds it back to CEMR? Please describe any such change. (d) If a change was made, when was it made? (e) If a change was made, was any aspect of that change associated with or part of the recent Qwest changes to a “stable” platform (see next paragraph).	<p>a) Yes. For trouble ticketing, CEMR goes through MEDIACC first and then MEDIACC interfaces with Qwest’s back-end systems.</p> <p>b) For trouble ticketing, CEMR has always gone through MEDIACC.</p> <p>c) No. There was no change that modified how CEMR and MEDIACC interface.</p> <p>d) See C. No change was made.</p> <p>e) See C. No change was made.</p>
5. On May 27, Qwest said in a CMP email that “the CEMR online interface was recently upgraded to a stable hardware and software platform that integrates well with current MEDIACC application, and will allow it to interface seamlessly to an MTG B2B application.” (a) We asked for more details about this statement on June 1 st , and yesterday Qwest indicated it would provide a written response but did not say when. Please respond or provide a date by which Qwest will respond. (b) Were the changes described by Qwest or part of these changes (which Qwest suggested it made to make the system “stable”) that Qwest connected CEMR to MEDIACC when CEMR was independent or more independent from MEDIACC before?	<p>Qwest is not required by the CMP to notify CLECs of non CLEC facing system changes.</p> <p>a) 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> <p>No. Please see response to #4 above.</p>
6. Please clarify how Qwest defines “MTG” or “Maintenance Ticketing Gateway” (and please use the term consistently going forward). At times, Qwest appears	

6/9/11 additional email from Bonnie Johnson – Integra The following questions were received from Integra following the MTG ad hoc call on June 8, 2011.	
to use MTG in a manner that applies to the front end only or the interface only and at other times Qwest seems to include its back-end systems as well. (a) What is encompassed in the term MTG? (b) Does “MTG,” as used by Qwest, include any of the Company’s back-end systems, such as Trunks Integrated Record Keeping System (TIRKS), Work Force Administration (WFA), or Loop Maintenance Operating System (LMOS)?	<p>a) MTG stands for “Maintenance Ticket Gateway” as such it applies to the B2B XML interface component for ticketing and POTS testing.</p> <p>b) No, MTG is a gateway to Qwest’s backend systems.</p>
7. (a) Are the Company’s back-end systems, including TIRKS, WFA, and LMOS, being replaced or undergoing any changes as part of, or associated with, this effort? (b) If so, please describe.	No. Not at this time.
<p>8. What will happen if Qwest retires MEDIACC in terms of interaction of CEMR with Qwest back-end systems?</p> <p>(a) As Qwest has said that CEMR currently points to MEDIACC, which points to Qwest’s back-end systems, will CEMR then point to MTG?</p> <p>(b) If so, when does Qwest estimate that will occur?</p> <p>(c) Will Qwest follow the merger steps before making changes to further this result?</p>	<p>a) Yes. Until MEDIACC is retired and replaced by MTG consistent with the terms of the merger settlement, users will be given the option to continue using CEMR with MEDIACC as the backend or with MTG as the backend. Upon retirement of MEDIACC CEMR will function seamlessly through MTG.</p> <p>b) The ability of CEMR to “point” to MTG will occur as part of the MTG design and implementation per the CMP timeline.</p> <p>c) When MEDIACC is retired and replaced by MTG, the merger steps will be followed as indicated by the modified MTG timeline.</p>
<p>9. Qwest was unclear as to when MEDIACC will be (1) integrated and (2) replaced. As Qwest knows, CLECs have objected to the Company integrating and/or replacing systems without fully complying with the merger conditions and orders, including Qwest moving itself first. (a) Please clarify. (b) Will the timeline that Qwest promised to provide on or before June 15th include details as to when Qwest plans such integration and replacement? (c) Will the information that Qwest indicated it would provide on or before June 15th include a description of any steps Qwest proposes to take to comply with the merger agreements and orders? (d) If not, for both, when will Qwest provide that information? (e) Confirm that the merged company is going to use MTG and describe when any integration for itself will occur and whether any integration is needed earlier than 30 months from the transaction closing date due to any aspect of the merger, including the questions Integra previously asked in its Matrix, Row 2(l), such as whether Embarq’s repair system (WebRSS) cannot be used after the billing integration</p>	<p>CR #SCR121608-01 to retire MEDIACC was placed in withdrawn status on May 18, 2011. As previously stated, Qwest believes that the process used to implement MTG as an alternative to MEDIACC is entirely consistent with the merger agreements and it will comply with the merger process when MEDIACC is retired and replaced by MTG. Please see timeline reviewed on the June 15, 2011 CMP call and prior responses to this matrix.</p>

<p>6/9/11 additional email from Bonnie Johnson – Integra The following questions were received from Integra following the MTG ad hoc call on June 8, 2011.</p>	
<p>10. (a) Does Qwest recognize that its plan to integrate MEDIACC and MTG falls within the merger agreements and orders and therefore falls within the 30-month moratorium on such changes? (b) What is Qwest’s proposal, if any, for dealing with the 30-month moratorium? (c) If Qwest is requesting a waiver of that 30-month time period, what is Qwest’s reason for the request (given that Qwest has recently indicated that the existing repair system is stable)?</p>	<p>CR #SCR121608-01 to retire MEDIACC was placed in withdrawn status on May 18, 2011. As previously stated, Qwest believes that the process used to implement MTG as an alternative to MEDIACC is entirely consistent with the merger agreements and it will comply with the merger process when MEDIACC is retired and replaced by MTG.</p>
<p>11. If Qwest implements MTG as its alternative to or replacement for MEDIACC, doesn’t this decide now the eventual replacement system for CEMR? In other words, when the merger agreement steps are eventually taken with respect to replacement of CEMR at a later date, will there be any flexibility as to what the replacement system will be or how it will be implemented, given that Qwest will already be using and wedded to MTG (before the end of the 30-month time merger time period)?</p>	<p>The question incorrectly assumes there is a replacement system for CEMR. To the contrary, the CEMR GUI is staying in place as previously indicated. All of the functionality currently present in CEMR will be present when MTG is implemented. Any potential future replacement of CEMR will be designed and implemented in accordance with CMP.</p>

<p>6/14/11 additional email from Karen Clauson – Integra The following questions were received from Integra following the CenturyLink email that provided the revised MTG Implementation Timeline.</p>	
<p>Enclosed is Qwest’s “revised” OSS timeline, which Qwest just distributed via CMP email and posting to the web calendar, after we inquired today as to why Qwest had missed the CMP deadline for distributing these materials. Integra continues to object to your plan. In some respects, the revised timeline increases Integra’s concerns about Qwest’s and CenturyLink’s plans and their lack of regard for the merger commitments and orders.</p> <p>Qwest continues to push full speed ahead with its plans to implement and integrate MTG by the end of this year, as shown in Columns A and B of the enclosed timeline. Per Columns D and E, only long after those steps have been completed will Qwest even begin the merger steps, commencing with notice to the FCC/PUC, that the merger agreement contemplates will happen <u>first</u>. As indicated in Integra’s May 19 email below, however, per FCC merger commitment (paragraph IV(A)(2)), Qwest is supposed to file its “<u>proposed transition plan</u>” with the regulators, not submit a fait accompli.</p>	<p>See prior responses. When MEDIACC is retired and replaced by MTG, the provisions of the settlement will be followed including any requirements regarding notice, transition plans, engagement of a 3rd party facilitator, testing and voting.</p>

6/14/11 additional email from Karen Clauson – Integra The following questions were received from Integra following the CenturyLink email that provided the revised MTG Implementation Timeline.	
<p>Qwest’s argument that this is “optional” for CLECs is transparent, and it does not bring the Company into compliance with its merger commitments. Qwest may argue that it is still “offering” CEMR/MEDIACC to CLECs, but the merger agreements require the Merged Company to both “use and offer” legacy Qwest OSS. This provision is not limited to CLEC use of legacy Qwest OSS. The merger agreements require that the merger steps be followed not only before a Qwest system is replaced, but also before a Qwest system is “integrated.” The detailed plan has to be filed with the FCC and Commissioners, and the other steps taken, before the Merged Company in any way integrates Qwest systems. Qwest appears to be choosing to read this as integrated for or with CLECs, but that is not the case. If any aspect of Qwest system/data is being integrated (e.g., Embarq and Qwest or other internal integration or integration for non-CLEC use), the company cannot proceed for 30 months, and it must follow the merger steps, including a third party facilitator (which is not mentioned in your revised timeline).</p>	<p>See prior responses. When MEDIACC is retired and replaced by MTG, the provisions of the settlement will be followed including any requirements regarding notice, transition plans, engagement of a 3rd party facilitator, testing and voting.</p>
<p>As indicated in the Joint CLEC Colorado and Minnesota filings, by implementing MTG for itself first, Qwest/CenturyLink decreases incentive to maintain the existing repair OSS. Also, although Qwest is claiming that this is “optional” for CLECs now, once Qwest has implemented MTG for itself or its own purposes, it will be more difficult, if not impossible, to obtain changes. If a CLEC does not expend resources now to review the draft specifications, etc., it risks Qwest later arguing that the specs were available and the CLEC chose not to review them. The Company’s approach may force CLEC(s) to go through the review process now, even if they plan to implement later, to try to prevent development that cannot be corrected. If they don’t “choose” to implement now (which is not a real choice), then they won’t be able to test the functionality and transactions in a manner allows up-front input, even though up-front input was intended by the merger agreement. The merger condition was supposed to protect CLECs from such resource expenditures for at least 30 months.</p>	<p>See prior responses. When MEDIACC is retired and replaced by MTG, the provisions of the settlement will be followed including any requirements regarding notice, transition plans, engagement of a 3rd party facilitator, testing and voting.</p>
<p>On May 2, 2011, you indicated that “CenturyLink continues to have concerns that a catastrophic failure could result with MEDIACC and CEMR.” On May 18, 2011, Qwest said in CMP that it had a “burning need” to get the new system in place. Since then, on May 27, 2011, Qwest declared in a CMP email that the existing repair OSS is now “stable.” Assuming there ever was an instability issue, now</p>	<p>See prior responses. When MEDIACC is retired and replaced by MTG, the provisions of the settlement will be followed including any requirements regarding notice, transition plans, engagement of a 3rd</p>

<p>6/14/11 additional email from Karen Clauson – Integra The following questions were received from Integra following the CenturyLink email that provided the revised MTG Implementation Timeline.</p>	
<p>that Qwest has declared the system stable, the burning need should have died out. There is no stability reason not to wait for the 30-month time period to which you only recently committed. In our May 4, 2011 meeting here, you indicated that CenturyLink has decided to move all of the company to the new system, MTG, and assured that therefore CLECs would not have to move to MTG and then move again. CLECs do not need to move at this time at all. Therefore, the remaining reason for the move is that the Merged Company is proceeding with its own merger-related integration plans. The company, however, agreed that it would not do so for OSS (including billing OSS if CLECs are affected) for at least 30 months.</p>	<p>party facilitator, testing and voting.</p> <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>If the Company nonetheless proceeds, the Company is, at a minimum, waiving any later claims that changes cannot be made because it will be too expensive for the Company to make changes, that CLECs should have reviewed the specs earlier, etc. in addition to being in violation of the agreement.</p> <p>Our objections, and our requests for answers to our previous questions, are ongoing.</p>	<p>Integra objections are noted. When MEDIACC is retired and replaced by MTG, the provisions of the settlement will be followed including any requirements regarding notice, transition plans, engagement of a 3rd party facilitator, testing and voting and any requested changes will be handled appropriately within the context of CMP and the process outlines in the merger settlements.</p>

<p>6/14/11 additional email from Bonnie Johnson – Integra The following questions were received from Integra following the CenturyLink email that provided the revised MTG Implementation Timeline.</p>	
<p><u>PRELIMINARY QUESTIONS ABOUT QWEST JUNE 14, 2011 REVISED TIMELINE</u>¹</p> <p>1. Please define “internal” and “external,” and please explain what is the difference.</p> <p>What is the purpose of “internal” tasks and of “external” tasks?</p> <p>Who does “internal” refer to? Qwest Corporation? And/or other CenturyLink entities? Any other carrier/company?</p>	<p>The “internal” timeline represents the initial implementation of MTG as an alternative. The “external” timeline represents milestones for the replacement and retirement of MEDIACC, consistent with the merger agreement.</p>
<p>2. There is an “internal” date of 5/2/2011 for “Begin Deployment” and “Begin Migration</p>	

¹ Integra has objected to Qwest proceeding with its pending CR and requested compliance with the merger agreements and orders. Nothing in this document or in Integra’s participation in CMP waives those objections. By proceeding over CLEC objection, Qwest has placed CLECs in a position of having to expend resources monitoring and commenting on Qwest’s activity, even though Qwest should not be proceeding in this manner.

<p>Planning” but you will not “begin working on draft tech specs” until July 5, 2011. How does the company begin deployment and migration planning without even draft specs to guide deployment and migration planning? Is there anything else being deployed or migrated? What do deployment and migration planning involve, with no tech specs?</p>	<p>Qwest’s MTG timeline indicates “Begin Development” occurs on 5/2/11. Qwest’s MTG timeline indicates “Begin Deployment Process” occurs on 12/10/11.</p> <p>Migration planning is based on current IT design and existing Wholesale business processes assumptions. Tech Specs will be driven by development and migration planning activities.</p>
<p>3. There is an “internal” date of 12/10/2011 for “Begin Deployment Process.” What is being deployed and for whom? For example, assume no CLECs request the so-called “optional” testing/implementation. In that scenario, which carriers/entities will “begin deployment” on or after December 10, 2011, but before October 2, 2012?</p>	<p>December 12, 2011 is the date for deployment of the initial platform to establish MTG infrastructure for any customer that wishes to use MTG as an alternative to MEDIACC.</p>
<p>4. How can the specifications on September 2, 2011 be “final” but the specifications ten months later, on July 2, 2012, be “draft”? Please explain how Qwest views this will work. What makes the later specs only “draft”? Won’t much of it already be implemented?</p>	<p>The September 2, 2011 date is to finalize specification for initial release. The July 2, 2012 date provides draft specs for final deployment.</p>
<p>5. If, after December 12, 2011, changes are required to the replacement interface (MTG) to help assure that the replacement interface provides the level of wholesale service quality provided before the transaction closing date, what process will Qwest require for those changes? Will Qwest require CLECs to submit a change request? Will Qwest bear the cost of these changes?</p>	<p>When MEDIACC is replaced, the settlement process, including acceptance testing and majority vote, will require Qwest/CenturyLink to implement a replacement system that meets CLEC needs or it will not pass. Moreover, as Integra and the other CLECs know, Qwest/CenturyLink desires to encourage CLECs to voluntarily use MTG once it is implemented. In order to do so, MTG must be acceptable to CLECs which Qwest/CenturyLink understands would require it to engage in communication and testing processes with CLECs similar to the settlement requirements. This is incentive enough for Qwest/CenturyLink to use a collaborative approach to address concerns as much as possible throughout development, recognizing too that in the end, the CLECs have the ability to veto it under the acceptance testing process if it later becomes the replacement system.</p> <p>No. Change request are not required through development.</p>

	<p>Qwest will evaluate and collaborate on requested changes consistent with the external implementation schedule and the settlement agreement. Qwest will bear the cost of agreed upon changes to MTG.</p>						
<p>6. There is a "Retire Mediacc" external date of 10/7/2013 for "external" tasks, but no "retire Mediacc" task for the "internal" timeline. When is Mediacc replaced by MTG in part or entirely for "internal" users?</p>	<p>MTG and MEDIACC will both be in operation for some time as per the MTG Timeline issued on June 15, 2011.</p>						
<p>7. Please explain why the timeframes are so compressed and how the company envisions working collaboratively or taking into account any CLEC input under such short timeframes. Even in 2012, under the "external" tasks, there is only a couple of days between the "walk through" and "comments due," leaving almost no time to absorb the walk through and comment. Then, there are only four days, until July 24, 2012, before the final tech specs are issued. A time period of four days does not suggest any plan on the Company's part to thoughtfully review, take into account, and possibly adjust its plans before final specs are issued. What is the purpose of commenting, however, if the Company has no plan to take the comments into account?</p>	<p>Both the "internal" and the "external" schedule are consistent with CMP.</p>						
<p>8. The companies are supposed to work together to develop acceptance criteria for the replacement interface (MTG). We do not find this in the revised timeline. Is this step going to be part of the internal and/or external tasks? When will it occur?</p>	<p>The Acceptance Criteria is developed 8/3/2012 to 9/18/2012.</p> <table border="1" data-bbox="1186 787 1879 941"> <tr> <td>Joint Test Planning Start</td> <td>8/3/2012</td> </tr> <tr> <td>Joint Test Planning Finish</td> <td>9/18/2012</td> </tr> <tr> <td>Testing Acceptance Criteria Finalized</td> <td>9/18/2012</td> </tr> </table>	Joint Test Planning Start	8/3/2012	Joint Test Planning Finish	9/18/2012	Testing Acceptance Criteria Finalized	9/18/2012
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<p>9. The revised timeline does not account for all of the merger steps. For example, please address the steps in the Joint CLEC agreement, on pages 2-4 of the enclosed document), such as aggregate transaction data, third party facilitator, <i>etc.</i>, and when each will occur (on the internal and/or external steps).</p>	<p>The revised timeline is designed to provide milestones for the retirement of MEDIACC and replacement with MTG and we understand that there is additional details or steps that must be provided. We will work collaboratively to add the steps to the process according to Section 11 of the CMP document and the merger agreements.</p>						