BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of)	Docket No. UT-100820
)	
QWEST COMMUNICATIONS)	
INTERNATIONAL, INC. AND)	
CENTURYTEL, INC.)	
)	
For Approval of Indirect Transfer of)	
Control of Qwest Corporation, Qwest)	
Communications Company LLC, and)	
Qwest LD Corp.)	
)	
)	

EXHIBIT BJJ-19

TO THE

RESPONSIVE TESTIMONY

OF

BONNIE JOHNSON

ON BEHALF OF INTEGRA TELECOM

September 27, 2010

Attachment S: Examples of Qwest Employee Conduct Reported by Integra's End User Customers¹

Description of Event	Description of Qwest Response and Date
Two End Users reported that a Qwest representative called and said	Qwest said it was unable to provide a response:
Qwest did not have to lease lines to Integra any longer:	
Two different Integra customers reported to Integra that a Qwest representative contacted them and said that Integra leases the lines from Qwest and due to a new federal Act Qwest is not required to lease the lines anymore and that Qwest can now save the customer a great deal of money. (10/19/09)	Qwest said it did not have enough information (name or callback number of caller) to find out information but Qwest said "Qwest was not able to locate a calling campaign in Minnesota. Be assured that Qwest continues to reinforce the Qwest policy on communicating with Wholesale customers." (10/22/09)
End User reported Qwest technician made disparaging remarks about	Qwest denied the Qwest technician made any
Integra and quoted rates Integra would charge them for work:	comments:
Customer reported to Integra that a Qwest technician told the customer that the trouble was in its jack and said that the technician told the customer Integra would charge \$350 to fix the jack. The Qwest trouble ticket confirmed the trouble was Qwest caused due to a broken jumper in the Qwest central office and not the customer's jack. Qwest fixed the jumper and restored the service. The customer also said the Qwest technician told the customer that Integra was nothing but trouble. The customer reported the next day they were out of service again. Integra dispatched a technician and found that the customer's wire was disconnected at the demarc with no explanation. (9/24/09)	Qwest said it reviewed the trouble tickets with the Qwest technicians involved and provided its overview, which was in conflict with what the customer told Integra. Qwest said" "At no time did the OST ² quote her a price to fix the jack or make derogatory commits about Integra." Qwest also said that Integra canceled the second trouble ticket. Integra canceled the trouble ticket because the Integra technician repaired the wire that was disconnected at the demarc, and restored the customer's service. (9/29/09)

Integra provides an issues log to Qwest service management regularly, and these examples are in the issues log, so Qwest has the supporting documentation.

2 "OST" refers to an outside technician.

Description of Event	Description of Qwest Response and Date
End User reported a Qwest technician said that Qwest repairs Qwest circuits in 4 hours but not for contracted wholesale customers (i.e., Integra): An Integra customer asked why they were having Qwest cable issues and its tenant (which is a Qwest customer) did not have an issue. The customer said that the Qwest technician dispatched for a repair on the circuit said that Qwest has a 4 hour turn around time for Qwest customers but not for contracted Qwest customers. (11/10/09)	Qwest denied there was any evidence of wrong doing: Qwest responded to Integra that it found no evidence of wrong doing. Integra asked Qwest for clarification of whether the response meant the technician denied making the comment or whether Qwest's response was intended to mean that Qwest believed the comment was appropriate. Qwest did not provide the clarification Integra requested and stated again it had found no evidence of wrong doing. (11/12/09)
End User reported that a Qwest Technician doing a repair made disparaging remarks about Integra: An Integra customer reported that while a Qwest technician was at the customer's location to repair its circuit, the technician found trouble on a second circuit. Integra's customer said that the Qwest technician said he would not touch this second circuit without a ticket. Integra opened a ticket on the second circuit and told the customer Integra would attempt to have the second ticket assigned to the Qwest technician while he was still onsite. The customer told Integra the Qwest technician said that would not happen and it was likely the second repair ticket would take a couple of days to resolve. The customer said the Qwest technician then said this is what happens when you have an alternate provider. (8/3/09)	Qwest agreed – Qwest said it addressed this with the manager and had taken the appropriate action: Qwest responded and said it took the appropriate action. (8/18/09)

Description of Event	Description of Qwest Response and Date
End User provided a copy of an email from Qwest which had	Qwest agreed - Qwest addressed the situation with
disparaging remarks about Integra:	its employee and contacted the partner that sent
	the email to cease the distribution:
Integra's customer sent Integra an email that Qwest sent to the customer.	
In the email, a Qwest Business Partner who said he worked closely with	Qwest responded and said it had addressed the
Qwest Corporate told the customer that Integra was a billing agent that	issue with its employee (the email was sent from a
was reselling Qwest service. The email said you are already on Qwest	Qwest partner working with Qwest Corporate-see
lines simply paying someone else to utilize them.	the email in attachment #5) and that Qwest had also
(5/11/09)	contacted the partner and asked that the partner
	cease distribution. (8/25/09)
End User reported that a Qwest technician intentionally brought the	Qwest said it the network organization had been
service down because the customer asked Qwest to move its van that	coached but also said it could not locate the crew
was taking customer's parking spots:	working at that location:
Integra's customer said that Qwest technicians had been working in the area for several days and were occupying parking spaces reserved for his customers. The customer said he asked the Qwest technicians to move the vans, and a Qwest technician said let's see how long it takes to get lines fixed if your service goes down. The next morning the customer told Integra the customer saw a Qwest technician climb the pole, and his service went down. The customer said the tech came down the pole and said good luck getting that fixed and left. Integra verified the customer was without service and opened a trouble ticket. Qwest closed the trouble ticket as no trouble found and said the service was good to the demarc. After Qwest closed the trouble the customer said the service started working again. (5/6/09)	Qwest said that without a description it was not able to find the Qwest crew working in that area, even though Integra provided very detailed information including an address and the times of day. (5/20/09)

Description of Event	Description of Qwest Response and Date
End User reported that, during a winback attempt, Qwest made	Qwest agreed - Qwest said that it addressed the
disparaging remarks about Integra:	issue:
Integra's customer said that Qwest came to the customer's location and attempted to win the customer's service back to Qwest. While at the customer's location, the customer said Qwest told the customer that Integra was a 3 rd party vendor and in 15 months Integra will raise the customer's rates and you will have no control over it. (4/15/09)	Qwest responded and said, "Qwest identified the agent selling on behalf of our company and addressed the issue with the vendor contractor to correct the behavior. Qwest has eliminated the program that was the source of the complaint and will no longer be marketing to this segment of customers in this market in this manner." (6/9/09)
End User ordered Qwest service to get a network interface device (NID)	Qwest said it reiterated process:
installed because a Qwest engineer provided inaccurate information:	
Integra ordered new service for one of its customers. The customer also needed a NID installed. The Qwest engineer told the customer that Integra's orders were not sufficient to get the NID installed and, if the customer wanted the NID installed, the customer would have to order service from Qwest. Upon the direction of the Qwest engineer, the customer ordered and paid to install service from Qwest when that was not required to install the NID. Integra's service requests were sufficient to move forward with the installation of the NID. (11/4/08)	Qwest responded and said, "Qwest has investigated and has reiterated process. Qwest continues to reinforce the Qwest policy on communicating with Wholesale customers." (1/9/09)
End User requested assistance because Qwest Retail refused to cancel a	Qwest canceled the port:
Integra's customer called and asked for help because, after several attempts, the customer was unable to cancel a request to port from Integra to Qwest. Qwest retail said it would not cancel the port request until the customer provided Qwest with a copy of the contract the customer had with Integra. (12/6/08)	Qwest did not provide what action was taken with Qwest employees, although Qwest did send a cancelation for the pending port which resolved the issue for Integra's customer. (12/17/08)
End User reported that a Qwest technician took its service down while	Qwest agreed - Qwest provided a response

Description of Event Description of Qwest Response and Date on a repair and was rude when the customer requested the technician regarding the Owest technician behavior and an acknowledgement of the mistake: restore his service: Integra customer said a Qwest repair technician was onsite and Qwest responded that "The customer's service was disconnected all of its circuits. Integra spoke with the customer and disconnected in error by a Qwest technician while provisioning other services in the same end-user reviewed the customer's records. Integra told the customer it did not see any pending repair tickets or pending orders that would explain why the terminal location. The Owest technician restored Qwest technician disconnected Integra's customer's circuits. The the services as requested, but did not contact the customer then told the Owest technician that it believed Owest had end-user to advise them of the status, because of the disconnected the circuits in error. The customer asked the technician to previous encounter with the individual." reconnect the circuits and investigate the source of the error. The Qwest technician's only reply was it is not that easy. When the said they were This is different than the final acknowledgement going to contact Qwest management the customer told Integra the Qwest Qwest sent to share with Integra's customer which technician said go ahead. The customer requested an acknowledgement said "Qwest acknowledges its mistake. The error of Owest's mistake from Integra. Owest provide a response on 9/3/08, was not made by the other service provider." however, the response did not meet the terms required in Integra's ICA. (9/16/08)Integra asked Qwest to provide an acknowledgement it could share with its customer. Qwest responded on 9/4/08, however, the response did not meet the terms required in Integra's ICA. Qwest provided a response on 9/16/08.3 (8/13/08)

End User reported that a Qwest technician made disparaging remarks

Qwest responded that the Qwest technician denied

³ Although the letter was dated 9/15/09, the Qwest service manager did not provide the letter to Integra until 9/16/09. See ICA §12.1.4.

Description of Event	Description of Qwest Response and Date
about Integra and also said the Qwest technician purposely removed	making disparaging remarks about Integra and
bridge clips while working a trouble ticket for the customer:	denied pulling the bridge clip:
Integra's customer said that a Qwest tech was at the premise on the date of the conversion to Integra and, when the technician left,the customer had heavy static on the line and the voice lines were ringing on the same line. Integra opened a trouble ticket. Qwest dispatched a technician and the Qwest Technician fixed the ringing into same line issue but there were other issues with outbound dialing and the amount of static was more pronounced. The Qwest technician spoke to Integra's customer and said the problems were Integra's equipment. Integra's customer also said that Qwest technician really bad mouthed Integra. Integra dispatched a technician and found the bridge clip missing and lines improperly connected. The customer said they believed that Qwest purposely removed the bridge clip during the conversion to Integra. (8/27/08)	Qwest's response said the Qwest technician denied making disparaging remarks about Integra, and denied pulling and leaving the bridge clips off. However, Qwest's response did say that the Qwest technician did remove the bridge clip (but reattached it) and that "The Supervisor reaffirmed the Qwest policy with the technician to prevent this type of incident occurring in the future." (9/18/08)
End User reported that a Qwest technician installing a new circuit	Qwest technicians denied giving Integra's
provided misinformation:	customer any repair times:
Integra's customer said the Qwest technician who installed a circuit told Integra's customer that Integra was changing its service from a traditional 4 wire circuit (for example a DS1 capable loop) to a 2 Wire Non-Loaded Loop. The Qwest technician said that this meant the end user would go from a 4 hour repair commit to a 24 hour repair commit when they were with Qwest if there is trouble on the circuit. (10/1/08)	Qwest responded that the Qwest technician did provide information about the type of circuit and was coached to only provide the circuit ID in the future. However, Qwest said the Qwest technician denied that the technician provided repair commitment times. (10/10/08)
End User reported a Qwest technician made disparaging remarks about	Qwest agreed - Qwest said it took the appropriate

Description of Event	Description of Qwest Response and Date
Integra:	action:
Integra opened trouble ticket for one of its customers. The trouble ticket status indicated that Qwest had a number of work force issues due to damaging storms that delayed Qwest's dispatching a technician on this ticket. When the Qwest technician was dispatched to the customer's premise, Integra's customer said that the Qwest technician told them that Qwest would have been out the day before but Integra refused to pay the \$95 service charge. (9/8/08)	Qwest responded and said "Qwest has investigated and appropriate action has been taken." (10/22/08)
End User reports Qwest employee made disparaging remarks about Integra:	Qwest agreed - Qwest responded that it was taking the appropriate action:
Eschelon's customer told Eschelon that the customer had contacted Qwest to ask about a Qwest engineering job to complete cabling and pedestal installation for a newly constructed facility for its company. The Qwest employee told the customer that Qwest could not help her because she was not a Qwest customer. The customer said the Qwest employee also said "why would you go with Eschelon since they are out of business now since Integra bought them." (3/29/07)	In Qwest's response, Qwest said that the appropriate action was taking place and that "There is an internal process of steps that will be taken to ensure this type of behavior does not happen again." (4/17/07)
End User reported Qwest provided inaccurate information about	Qwest said it was unable to find a flag or the

Description of Event

Integra's order:

Eschelon's customer is scheduled to convert to Eschelon on 10/4/07. The customer called Qwest retail on an unrelated technical issue. The Qwest retail representative told the customer that Qwest has a flag on the account indicating the service is converting to Eschelon. The Qwest representative told the end user customer that Qwest was going to disconnect the service on 9/26/07. The customer told Eschelon the customer was concerned because Eschelon said it would convert on 10/4/07 and not 9/26/07 (9/20/07)

Description of Qwest Response and Date Qwest employee that provided the misinformation to the customer:

In its response Qwest said: "Based on Qwest records and interviews with the Qwest Retail employees that had access to this account on 9/20/07, we cannot identify the individual who may have made inappropriate comments to your enduser customer. However, all Qwest Retail employees involved with this end-user on 9/20/07 were coached and retrained on the Qwest policy for communicating with Wholesale customers." (10/19/07)