

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

CENTURYLINK, INC.,

Application for Approval of Merger between
CenturyTel, Inc. and Qwest Communications
International, Inc.

Docket No. UM 1484

JOINT CLECS' MOTION TO COMPEL

Oral Argument Requested

MOTION

Pursuant to OAR 860-014-0070(3), the Joint CLECs¹ moves the Public Utility Commission of Oregon ("Commission") to compel CenturyTel, Inc. ("CenturyLink") to produce all documents and information responsive to Joint CLECs' Data Requests Nos. JC-166 through JC-172.

CERTIFICATION OF GOOD FAITH EFFORT TO RESOLVE DISCOVERY DISPUTE

The Joint CLECs have made a good-faith effort to resolve these matters informally by conferring in a telephone call with counsel for both CenturyLink and Qwest on or about October 11, 2010, but the parties were unable to resolve the dispute that is the subject of this motion. OAR 60-014-0070(3).

ARGUMENT

Oregon law provides for a broad scope of discovery.² The applicable rules generally permit discovery pursuant to the Oregon Rules of Civil Procedure.³ "For all forms of

¹ Joint CLECs: XO Communications Services, Inc., tw telecom of oregon, LLC, Integra Telecom of Oregon, Inc., Integra Telecom of Oregon, Inc., Advanced TelCom, Inc., Electric Lightwave, LLC, Eschelon Telecom of Oregon, Inc., Oregon Telecom Inc., and United Telecommunications Inc. d/b/a Unicom, Covad Communications Company, PriorityOne Telecom, Inc., & Charter Fiberlink OR-CCVII, LLC.

² *Oregon Orchards v. Ins. CO. of N.A.*, 239 Or 192, 198, 397 P2d 74 (1964) (noting the trend to require production of documents in order to determine relevancy, rather than denying as irrelevant before disclosing the documents).

discovery,” the Oregon Rules of Civil Procedure allow parties to “inquire regarding any matter, not privileged, which is relevant to the claim or defense of the party seeking discovery or to the claim or defense of any other party.”⁴ Even inadmissible material is discoverable “if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.”⁵ Despite this liberal standard and Joint CLECs’ attempts to obtain the requested information without a motion, it is plain that CenturyLink has failed to produce discoverable information.

Joint CLECs propounded Data Requests Nos. JC-166 through JC-189 on September 16, 2010.⁶ As to all of these requests, Joint CLECs indicated that CenturyLink has a duty to supplement its responses: “These information requests are intended to be continuing in nature. The parties responding to these information requests are asked to promptly supplement their responses to the extent they become aware of information that makes any response inaccurate or incomplete”⁷

Request Nos. JC-166 and JC-167 ask CenturyLink to identify each vendor (e.g., DSET or Synchronoss) with which CenturyLink has had any communications regarding systems and/or Joint CLECs’ plans related to processing or potential processing of orders and ask CenturyLink to provide all related documents.⁸ Request No. JC-168 asks CenturyLink to identify each vendor (e.g., DSET or Synchronoss) with which CenturyLink has had any communications regarding systems and/or Joint CLECs’ plans including systems/Joint CLECs’ efforts and also

³ OAR 860-011-0000 (providing that the “Oregon Rules of Civil Procedure shall govern in all cases except as modified by these rules, by order of the Commission, or by ruling of the ALJ”); *see also* OAR 860-014-0070 (providing for data requests to be used in discovery, without any restriction on the scope of discovery pursuant to the Oregon Rules of Civil Procedure).

⁴ Or. R. of Civ. Pro. 36 B(1).

⁵ *Id.*

⁶ Joint CLECs Data Requests: Nos. JC-166 through JC-189, at 2. A true and correct copy of Joint CLECs Data Requests: Nos. JC-166 through JC-189 is attached as Exhibit 1 to this Motion.

⁷ Exhibit 1, at 2; *cf.* ORCP 43 B(4).

⁸ Exhibit 1, at 1-2.

asks CenturyLink to provide “all documents, including but not limited to emails, that evidence, refer or relate to such communications.”⁹ Request Nos. JC-169 and JC-170 ask whether CenturyLink has communicated with any vendor or gateway provider (e.g., DSET or Synchronoss) that represents CLECs that may request e-bonding for processing of orders regarding post-transaction systems consolidation or planning and, if so, requests documents and details relating to those communications. Specifically, Request No. JC-170 asks:

Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e-bonding with CenturyLink, or with the Merged Company after Joint CLECs’ of systems with Qwest, relating to the processing or potential processing of LSRs? If your answer is in the affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication(s), and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.¹⁰

Local Service Requests (“LSRs”) are used by CLECs to place orders for unbundled network elements (“UNEs”)¹¹ used by CLECs to provide local service. Request No. JC-169 is otherwise identical, but concerns the processing or potential processing of Access Service Requests

⁹ Exhibit 1, at 3.

¹⁰ Exhibit 1, at 5.

¹¹ An exception is the UNE Unbundled Dedicated Interoffice Transport (UDIT), which is ordered via ASR in Qwest territory.

(“ASRs”) rather than LSRs.¹² Notably, nothing in either request limits discovery to “formal” communications or “formal” requests for ebonding. Rather, Requests Nos. JC-169 and JC-170 ask about *any* such communications, request *all* related documents, and further ask for the identity of the vendor or gateway provider, date of each communication, and the Joint Applicants’ employees or representatives that participated in each communications.¹³ Such communications might also be responsive to more Requests Nos. JC-166 – JC-169, which similarly ask CenturyLink to provide “*all* documents, including but not limited to emails, that evidence, refer or relate to such communications.”¹⁴

On September 23, in response to similar requests in a parallel proceeding in Minnesota, CenturyLink admitted that inquiries responsive to Joint CLECs’ requests had, in fact, been made. Specifically, CenturyLink’s response to Request No. 7 in Minnesota stated:

CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink’s capabilities related to ebonding for LSRs, but has not received any formal requests.¹⁵

CenturyLink’s response to Request No. 6 admitted to similar inquiries about ASRs.¹⁶ Yet, despite admitting the existence of responsive communications, CenturyLink produced no documents in the Minnesota proceeding, identified no vendors or gateway providers, provided no dates, and failed to identify a single employee that participated in such communications.¹⁷

¹² Exhibit 1, at 4.

¹³ Exhibit 1, at 4 – 5.

¹⁴ Exhibit 1, at 1 – 3 (emphasis added).

¹⁵ CenturyLink’s Supplemental Responses to Joint CLECs’ Third Set of Information Requests (Minnesota), at 1 – 2. A true and correct copy of those responses, showing Joint CLECs’ requests and CenturyLink’s initial and supplemental responses in the Minnesota proceeding, is attached as Exhibit 2 to this Motion.

¹⁶ *See id.*

¹⁷ *See id.*

In an effort to pre-empt similarly deficient responses in Oregon, counsel for Joint CLECs sent a letter to Qwest's and CenturyLink's respective counsel on September 27, 2010.¹⁸ That letter identified Oregon Joint CLEC Data Requests JC-166 through JC-172 as comparable to certain requests in Minnesota.¹⁹ It explained the material deficiencies in CenturyLink's Minnesota responses, including the failure to "identify the vendor or gateway provider making inquiries; state the date of the inquiries/communications; or identify each CenturyLink and Qwest employee or representative who participated in such communications."²⁰ The letter pointed out that Joint CLECs' requests were in no way limited by the concept of a "formal request,"²¹ and warned that similar responses by Joint Applicants in the Oregon proceeding would be deemed materially deficient.²²

On September 30, 2010, Qwest and CenturyLink submitted their Oregon responses to Joint CLECs' Third Set of Discovery Requests.²³ Qwest and CenturyLink supplemented those responses on October 5, 2010.²⁴ Despite Joint CLECs' letter, the Oregon responses evinced the same deficiencies as in Minnesota. With respect to Requests Nos. JC-166 – JC-172, Joint Applicants produced no documents, identified no vendors or gateway providers, provided no dates, and identified no employees. CenturyLink's initial response to Request No. JC-169 stated:

CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink's capabilities related to ebonding for ASRs, but has not received any formal requests.²⁵

¹⁸ Letter from Mark Trinchero to Alex Duarte, William Hendricks and Barbara Young, September 27, 2010 (incorporating a letter from Gregory A. Merz to Michael J. Ahern). A true and correct copy of that letter is attached as Exhibit 3 to this Motion.

¹⁹ *Id.* at 2.

²⁰ *Id.* at 4 ("List of Inadequacies").

²¹ *Id.* at 2.

²² *Id.* at 1.

²³ A true and correct copy of CenturyLink's Responses to Joint CLECs' Third Set of Discovery Requests is attached as Exhibit 4 to this Motion.

²⁴ A true and correct copy of CenturyLink's Supplemental Responses to Joint CLECs' Third Set of Discovery Requests is attached as Exhibit 5 to this Motion.

²⁵ Exhibit 4, at 4.

The supplemental response, rather than providing the missing documents or details related to these inquiries, denied that any such documents existed:

The inquiries that CenturyLink has received from vendors or gateway providers regarding CenturyLink's capabilities related to ebonding for ASRs were informal discussions that were informational in nature. Because of the informal nature of these inquiries, no notes were taken and no other documentation exists regarding these inquiries.²⁶

With respect to Request No. JC-170, CenturyLink also denied that any responsive documents exist, after acknowledging that CenturyLink received relevant inquiries:

CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink's capabilities related to ebonding for LSRs, but has not received any formal requests.²⁷

The inquiries that CenturyLink has received from vendors or gateway providers regarding CenturyLink's capabilities related to ebonding for LSRs were informal discussions that were informational in nature. Because of the informal nature of these inquiries, no notes were taken and no other documentation exists regarding these inquiries.²⁸

CenturyLink unequivocally denied that records of such communications existed, stating "no notes were taken and no other documentation exists."²⁹ CenturyLink further denied that any "decisions have been made regarding the potential consolidation of wholesale OSS systems after the merger."³⁰ Qwest adopted CenturyLink's denials by reference.³¹

²⁶ Exhibit 5, at 1.

²⁷ Exhibit 4, at 5.

²⁸ Exhibit 5, at 3.

²⁹ *Id.* at 1 – 4.

³⁰ *Id.* at 5 – 6.

³¹ See Qwest's Responses to Joint CLECs' Third Set of Discovery Requests, at 1 – 7. A true and correct copy of those responses is attached as Exhibit 7 to this Motion.

Those flat denials are inconsistent with the facts. As a customer interested in doing business with DSET,³² Joint CLECs received an example of documentation that CenturyLink has represented does not exist. Specifically, provided with this Motion is an email regarding this very subject matter between CenturyLink and DSET.³³ DSET is a gateway provider to CLECs for electronic interfaces with Qwest's Operations Support Systems ("OSS").³⁴

Integra, one of the Joint CLECs, asked DSET, as a gateway provider, about OSS following any merger between Qwest and CenturyLink and specifically asked about ebonding for LSRs.³⁵ By way of a response, on September 1, 2010, Jim Seigler of DSET, when sending a follow-up email to Mike Norton of CenturyLink (the "DSET email"), blind-copied Stephanie Prull, an Integra IT Analyst, on the DSET email.³⁶

In the DSET email, Mr. Seigler refers to customers that want ebonding relating to both ASR and LSR processing – the subject matter of Request Nos. JC-169 and JC-170. Mr. Seigler confirms the conversation with CenturyLink to the effect that, after the merger, when all the systems have been consolidated, the merged company will support a Unified Order Management (UOM) interface for both ASRs and LSRs.³⁷ This represents a change for wholesale customers because Qwest's ASR interface is UOM-compliant but its LSR interface is not.³⁸ The contents of the DSET email contradict CenturyLink's claim that "no decisions have been made regarding the potential consolidation of systems after the merger."³⁹

³² Declaration of Stephanie Prull in Minnesota Public Utilities Commission Docket No. P-421, et al./PA-10-456, October 8, 2010 ("Prull Decl."), ¶¶ 3-4.

³³ Attachment A to Prull Decl.

³⁴ Prull Decl., ¶ 2.

³⁵ Prull Decl., ¶ 3.

³⁶ Prull Decl., ¶ 4.

³⁷ Attachment A to Prull Decl.

³⁸ Exhibit 4, at 1 – 4 (CenturyLink's supplemental responses to Requests Nos. 169 – 170).

³⁹ *Id.*

DSET interfaces with telecommunications carriers and serves telecommunications carriers as customers and potential customers. DSET is not a party to this merger proceeding. It should be unnecessary for Joint CLECs to have to, in order to obtain complete and accurate discovery responses, point CenturyLink to an email communication Integra had with DSET. CenturyLink has brought the merger proceeding and has an obligation to diligently search its records and provide complete, accurate responses to discovery conducted in that proceeding. Because CenturyLink was not forthcoming in its discovery responses, however, Joint CLECs have had to provide the DSET email as support for this motion.

CenturyLink has had the DSET email since September 1, 2010 -- the date it was sent to Mr. Norton's CenturyLink email address. Moreover, the email indicates that it is confirming earlier communications that were also not described in CenturyLink's discovery responses. But, CenturyLink has never produced the DSET email, never identified DSET as a gateway provider with whom CenturyLink has had such communications, and has never identified Mr. Norton as an employee participating in such communications. This is true even though DSET is one of the providers *expressly named* in several discovery requests, including Requests Nos. JC-169 and JC-170. Rather than produce the email in response to Joint CLECs' requests, CenturyLink's supplemental responses denied its existence, stating that "no notes were taken and no other documentation exists regarding these inquiries."⁴⁰

Obviously, such documentation does exist. CenturyLink's responses reveal that CenturyLink has either failed to conduct a reasonable inquiry concerning such material or is withholding such materials.⁴¹ Given that Joint CLECs identified DSET *by name* in its request, there is no reason that CenturyLink failed to reference or produce the DSET email. This is

⁴⁰ *Id.*

⁴¹ *Cf.* ORCP 45 B (requiring reasonable inquiry in context of requests for admissions); ORCP 46 A(3) (stating that for purposes of a motion to compel, "an evasive or incomplete answer is to be treated as a failure to answer").

particularly true because Mr. Norton appears to work in relatively close proximity to Melissa Closz, CenturyLink's Director Wholesale Operations.⁴² CenturyLink identified Ms. Closz as the "sponsor" for CenturyLink's responses to Joint CLECs' Requests Nos. 166-172.⁴³ The Commission should investigate whether CenturyLink, and Ms. Closz in sponsoring this answer, made any inquiries of Mr. Norton as part of CenturyLink's duty to conduct a reasonable inquiry and provide complete answers.⁴⁴ If CenturyLink has failed to conduct a reasonable inquiry, or has provide incomplete or evasive answers, then it has effectively failed to answer Joint CLECs' data requests.⁴⁵

CenturyLink's general and unsupported assertions regarding relevancy and burden are no basis for withholding information. Joint CLECs are aware of no confidentiality issues, and CenturyLink marked none of these responses confidential. To the extent that CenturyLink indicates it has concerns about the confidentiality of any documents, however, those concerns are fully addressed by the protective order in this case. Information about the DSET email and others like it should have been produced in response to Joint CLECs' Third Set of Requests. That CenturyLink did not provide the DSET email raises the question of what additional documents and information have not been provided in this matter.

For the foregoing reasons, Integra moves the Commission to compel CenturyLink to conduct a reasonable search for all documents and other information responsive to Joint CLECs's Data Requests Nos. JC-166 through JC-172, and to produce all such documents and other information immediately. Hearings in this matter are currently scheduled to begin on October 20, 2010. For Joint CLECs to be afforded a meaningful opportunity to address the

⁴² Prull Decl., ¶5.

⁴³ Exhibit 4, at 1 – 7; Exhibit 5, at 1 – 6.

⁴⁴ Cf. ORCP 45 B (requiring reasonable inquiry in context of requests for admissions).

⁴⁵ See ORCP 46 A(3) (stating that for purposes of a motion to compel, "an evasive or incomplete answer is to be treated as a failure to answer").

discovery material responsive to these requests in the evidentiary record in this proceeding, it must be allowed time to obtain the material and use it to prepare for the hearings.⁴⁶ Therefore, Joint CLECs request expedited treatment of this Motion to Compel.

Dated: October 11, 2010

DAVIS WRIGHT TREMAINE LLP

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⁴⁶ Because even an expedited hearing would not allow adequate time, Joint CLECs have filed a motion to amend the schedule concurrent with the filing of this Motion.



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September 16, 2010

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Re: Oregon PUC Docket UM 1484 – Joint CLECs¹ Data Requests JC-166 through JC-189

Please provide responses electronically only and in native format, except for confidential materials.

Enclosed herein is "Joint CLECs Data Requests: Nos. JC-166 through JC-189."

Please send electronic copies of the responses to marktrinchero@dwt.com and gregory.merz@gpmlaw.com. Hard copies of confidential materials should be sent to the attention of:

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Portland, OR 97201-5630

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¹ Joint CLECs: XO Communications Services, Inc., tw telecom of oregon, llc, Integra Telecom of Oregon, Inc., Integra Telecom of Oregon, Inc., Advanced TelCom, Inc., Electric Lightwave, LLC, Eschelon Telecom of Oregon, Inc., Oregon Telecom Inc., and United Telecommunications Inc. d/b/a Unicom, Covad Communications Company, PriorityOne Telecom, Inc., & Charter Fiberlink OR-CCVII, LLC.

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Please provide the responses to these requests no later than September 30, 2010. These are continuing requests during the pendency of this proceeding and Respondents' should supplement the responses to the extent additional information becomes available. If you have any questions, please do not hesitate to call me at: 503-778-5318. Thank you in advance to your attention to this matter.

Very truly yours,

Davis Wright Tremain LLP



Mark Trinchero
Of Attorneys for Joint CLECs

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1484

In the Matter of

CENTURYLINK, INC.,

Application for Approval of Merger
between CenturyTel, Inc, and Qwest
Communications International, Inc.

JOINT CLECS¹ DATA REQUESTS: Nos. JC-166 through JC-189

To: The CenturyLink and Qwest and their attorneys of record:

You are hereby requested to provide written answers to the following information requests and produce responsive documents within the time provided by the applicable rules and/or procedural schedule.

DEFINITIONS

The word "CenturyLink," as used in these requests, refers to each of the "CenturyLink Operating Companies," individually, identified in the Petition in this matter. Accordingly, you are requested to respond separately for each CenturyLink Operating Company to the extent any request applies to such Company and your answer varies by Company. If the answer to any information request is different for a legacy CenturyTel company than for a legacy Embarq company, provide both answers and indicate the company to which each applies.

The term "Closing Date" refers to the date on which the transaction that is the subject of this proceeding is completed.

¹ Joint CLECs: XO Communications Services, Inc., tw telecom of oregon, llc, Integra Telecom of Oregon, Inc., Integra Telecom of Oregon, Inc., Advanced TelCom, Inc., Electric Lightwave, LLC, Eschelon Telecom of Oregon, Inc., Oregon Telecom Inc., and United Telecommunications Inc. d/b/a Unicom, Covad Communications Company, PriorityOne Telecom, Inc., & Charter Fiberlink OR-CCVII, LLC.

The term "Merged Company" refers to the post-merger company (CenturyLink and its Operating Companies and Qwest and its Operating Companies, collectively, after the Closing Date).

The word "Qwest," as used in these information requests, refers to each of the "Qwest Operating Companies," individually, identified in the Petition in this matter. Accordingly, you are requested to respond separately for each Qwest Operating Company to the extent any request applies to such Company and your answer varies by Company.

"Synchronoss" refers to Synchronoss Technologies, Inc., including Wisor Telecom Corp.

"You" and "your," as used in these requests, refer to CenturyLink and Qwest, as those terms are defined in these Requests.

INSTRUCTIONS

These information requests are intended to be continuing in nature. The parties responding to these information requests are asked to promptly supplement their responses to the extent they become aware of information that makes any response inaccurate or incomplete and as otherwise required by the rules.

For each of the following information requests, provide the names, titles and employer of the persons preparing the responses. Also, provide the requested information in native, executable format (e.g., Word, Excel) to the extent possible.

INFORMATION REQUESTS

JC-166. Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding processing or potential processing of Access Service Requests (ASRs) to occur after the Closing Date and/or systems integration or potential systems integration and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication;

- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative, who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication.

JC-167. Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding processing or potential processing of Local Service Requests (LSRs) to occur after the Closing Date and/or systems integration or potential systems integration and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication;
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication.

JC-168. Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding data mapping, data conversion, or other systems/integration efforts to occur or be completed after the Closing Date and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication;
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication.
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication.

JC-169. Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e-bonding with CenturyLink, or with the Merged Company after integration of systems with Qwest, relating to the processing or potential processing of ASRs? If your answer is in the affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication, and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);

- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.

JC-170. Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e-bonding with CenturyLink, or with the Merged Company after integration of systems with Qwest, relating to the processing or potential processing of LSRs? If your answer is in the affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication(s), and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication.
- c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.

JC-171. Please indicate whether, after the systems of the Merged Company have been consolidated, the Merged Company will support a Unified Ordering Model (UOM) interface for ASRs.

JC-172. Please indicate whether, after the systems of the Merged Company have been consolidated, the Merged Company will support a UOM interface for LSRs.

JC-173. Is the interface that Qwest currently uses to process ASRs for CLECs a UOM interface? If so:

- a. Identify the interface;
- b. State your basis for asserting that the interface is UOM compliant, consistent with Alliance for Telecommunications Industry Solutions (ATIS) guidelines or standards;
- c. Provide Qwest documentation dated or posted before the transaction announcement date indicating that the interface is UOM compliant.

JC-174. Is the interface that Qwest currently uses to process LSRs for CLECs a UOM interface? If so:

- a. Identify the interface;
- b. State your basis for asserting that the interface is UOM compliant, consistent with ATIS guidelines or standards;

- c. Provide Qwest documentation dated or posted before the Merger Announcement Date (April 21, 2010) indicating that the interface is UOM compliant.

JC-175. Is the interface that CenturyLink currently uses to process ASRs for CLECs a UOM interface? If so:

- a. Identify the interface;
- b. State your basis for asserting that the interface is UOM compliant, consistent with ATIS guidelines or standards;
- c. Provide CenturyLink documentation dated or posted before the transaction announcement date indicating that the interface is UOM compliant.

JC-176. Is the interface that CenturyLink currently uses to process LSRs for CLECs a UOM interface? If so:

- a. Identify the interface;
- b. State your basis for asserting that the interface is UOM compliant, consistent with ATIS guidelines or standards;
- c. Provide CenturyLink documentation dated or posted before the Merger Announcement Date (April 21, 2010) indicating that the interface is UOM compliant.

JC-177. CenturyLink has indicated that it uses the EASE system to process LSRs and ASRs, provides access to WebRRS for maintenance and repair or provides the option to use "800" access numbers to reach the appropriate repair center. Please answer the following:

- a. Please provide the name of the software company who developed these systems and the systems integrator who deployed EASE and WebRRS both for legacy Embarq and legacy CenturyLink.
- b. Were either of these systems developed, in whole or part, by Wisor Telecom Corp. (a firm acquired by Synchronoss Technologies, Inc.)? If so, please describe the role of Wisor Telecom Corp.
- c. What role, if any, will Wisor or Synchronoss have after the Closing Date? For example, is Wisor or Synchronoss a selected vendor for LSRs? For ASRs? Have proposals relating to activities that will occur or be completed after the Closing Date been exchanged, or have agreements been entered into that apply to time periods after the closing date? If so, provide any documents evidencing, referring or relating to any such proposal or agreement.

JC-178. Which of the following pre-order functions does CenturyLink currently provide with EASE? For each subpart below, state whether the function is available for ASRs, LSRs, or both and whether the function is available with application-to-application interface (or e-bonding), Graphical User Interface (GUI) interface, or both.

- a. Address validation
- b. Channel Facility Assignment (CFA) Validation
- c. Meet Point Query Validation
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation
- e. Raw Loop Data Validation (at least for pre-order functions, services and products that Qwest currently provides)
- f. Billing Account Number (BAN) Validation
- g. Customer Service Records (CSR)
- h. Telephone Number(s) (TNs) Reservation
- i. Provide Facility Availability
- j. Provide Service Availability
- k. Loop Qualification for Integrated Services Digital Network (ISDN)
- l. Loop Qualification for Unbundled Asymmetric Digital Subscriber Line (ADSL)
- m. Loop Qualification for Commercial Broadband Services
- n. Appointment Scheduling

JC-179. Which of the following order types does CenturyLink provide using EASE? If an order type cannot be performed in EASE, then please provide information regarding how a CLEC places that order type (e.g., via facsimile or via e-mail). For each subpart below, state whether the order type is available for ASRs, LSRs, or both and whether the order type is available with application-to-application interface (or e-bonding), GUI interface, or both. To the extent you are unclear about the order type, service, or product, please see Qwest's PCAT and ICAs regarding the item in each subpart.

- a. Unbundled Loop
- b. Unbundled Subloop:
 - i. Unbundled Feeder Loop
 - ii. Unbundled Distribution Loop
- c. Local Number Portability
- d. Loop with Number Port

- e. Unbundled Distribution Loop with Number Portability
- f. Directory listing
- g. Resale Private Line
- h. Resale POTS
- i. Resale Public Access Line (PAL)
- j. Resale PBX
- k. Resale ISDN
- l. Resale Designed Trunks
- m. Resale Frame Relay
- n. Resale DID In Only Trunks
- o. Commercial DSL (Broadband for Resale)
- p. Unbundled Analog Line Side Switch Port
- q. Unbundled Analog Line Side Switch Port ISDN BRI Capable
- r. Unbundled Analog DID/PBX Trunk Port
- s. Unbundled DS1 DID/PBX Trunk or Trunk Port Facility
- t. UNEP ISDN BRI
- u. UNEP POTS
- v. UNEP Centrex
- w. UNEP Centrex 21
- x. UNE-P DSS Facility
- y. UNE-P DSS Trunk
- z. UNE-P PRI ISDN Facility
- aa. UNE-P PRI ISDN Trunk
- bb. UNE-P PBX DID In-Only Trunk
- cc. UNE-P PBX Design Trunk

dd. EEL/UNE Combination

JC-180. For any of the above in Request Numbers 13 and 14 for which CenturyLink's answer is in the negative (indicating that CenturyLink does not currently provide the function or order type using EASE or does not have a current offering):

- a. Does CenturyLink have any plans to offer the function or order type via an application-to-application interface (or e-bonding), GUI interface, or both, after the Closing Date? If so, please describe.
- b. Does the availability of the function or order type after the Closing Date depend on the system that will be used after any consolidation of systems? If so, please explain.

JC-181. Does CenturyLink or the system called EASE currently impose volume or other limitations that require a CLEC to submit its service request manually (e.g., via facsimile or via e-mail) for an order type typically accepted by the EASE system? For example, the EASE System may normally process a Number Port order type but it may not allow the CLEC to submit a range of Direct Inward Dials (DIDs) on a single order in EASE and therefore requires a CLEC to manually submit that Number Port order. Additionally, if any orders are treated as a project, please describe the criteria for the project (e.g., number of telephone numbers for which CenturyLink requires project handling) and state whether orders treated as a project are submitted via EASE or manually. In any case, identify if any aspect of the processing of the order is manual.

JC-182. During LSR processing, when one or more errors occur, please describe the EASE validation process and specifically indicate, when multiple errors occur, whether EASE presents back to the CLEC user all identified errors at one time, or, if not, in what sequence and with what timing are the errors presented back to the CLEC user?

- a. Is this information communicated to CLEC as an upfront edit before LSR acceptance? If not, please describe how it is processed and presented to CLEC.

18. Does the system called EASE, as currently implemented by CenturyLink, pre-populate information in the LSR?

JC-183. If the response to Request Number 18 is in the negative (no), is the pre-population of information functionality currently being evaluated and, if so, identify any dates or timeframes that have or are being considered or evaluated. Please provide any documents, including any EASE/LSR development roadmap(s), referring or relating to evaluation of pre-population of information.

JC-184. Has CenturyLink declined, put off until later, or otherwise delayed fulfillment of any request from any carrier for use of an application-to-application interface or e-bonding relating to processing of ASRs? If so:

- a. Identify each carrier;

- b. State the date the request was made;
- c. State the city and state for which the request was made;
- d. State each reason (e.g., rural carrier status or any other reason) why CenturyLink declined, put off, or delayed fulfillment of the request.

JC-185. Has CenturyLink declined, put off until later, or otherwise delayed fulfillment of any request from any carrier for use of an application-to-application interface or e-bonding relating to processing of LSRs? If so:

- a. Identify each carrier;
- b. State the date the request was made;
- c. State the city and state for which the request was made;
- d. State each reason (e.g., rural carrier status or any other reason) why CenturyLink declined, put off, or delayed fulfillment of the request.

JC-186. Will CenturyLink, after the Closing Date, terminate, not renew, or otherwise discontinue any license agreement relating to any software used in connection with any service used or requested by CLECs and provided by CenturyLink, either in legacy Qwest or legacy CenturyLink territory (e.g., software relating to Centrex Mate Service or Centron)? If so:

- a. Identify the software;
- b. Identify the service that CLECs use the software to access;
- c. Describe in detail any CenturyLink's plans to terminate, not renew, or otherwise discontinue any license agreement, including dates of anticipated termination on nonrenewal.

JC-187. Has CenturyLink previously terminated, not renewed, or otherwise discontinued any license agreement relating to any software used in connection with any service used or requested by CLECs (e.g., software relating to Centrex Mate Service or Centron)? If so, please indicate whether the related product or service ordered or requested by CLEC(s) remained available to CLEC(s) after CenturyLink terminated, did not renew, or otherwise discontinued any license agreement and, if so, whether the functionality of the product or service remained the same.

JC-188. Please refer to CenturyLink-Qwest Update #5, dated August 10, 2010.² Update #5 shows that three consulting firms are assisting with integration planning efforts: (i) PricewaterhouseCoopers (for overall integration coordination), (ii) Bain & Company (for

² Available at: <http://www.centurylinkqwestmerger.com/downloads/key-materials/CenturyLink-Qwest%20Update%205.pdf>

organization design) and (iii) Hewitt Associates (for compensation). Separately for each consulting firm, provide the following:

- a. A detailed description of the activities each firm has performed for CenturyLink and/or Qwest to date.
- b. A detailed description of the activities each firm will be performing for CenturyLink and/or Qwest in the future related to the proposed transaction.
- c. Any instructions, proposed work plan, or similar direction (written or oral) provided by CenturyLink and/or Qwest to each firm in relation to the firms' assisting the Joint Applicants with integration planning.
- d. Any recommendations, findings or responses (written or oral) provided to CenturyLink and/or Qwest by each of the firms in relation to their role of assisting Joint Applicants with integration planning.
- e. Identify the personnel (name, title and employer) from CenturyLink and/or Qwest that are point(s) of contact for each of the three firms in relation to the firms' integration planning assistance.
- f. Identify the personnel (name, title and employer) from the consulting firms that are point(s) of contact for CenturyLink and/or Qwest in relation to the firms' integration planning assistance.
- g. This request, as with all the requests, is ongoing, and CenturyLink/Qwest should update their responses to this request as additional information becomes available.

JC-189. Please indicate whether CenturyLink instituted a technician feedback process since consummation of the CenturyTel/Embarq merger. (For reference purposes, please see page 11, lines 13-14 of the testimony of Jasper Gurganus on behalf of CWA in Minnesota Docket P-421, et al./PA-10-456.)

- a. If the answer is anything other than an unequivocal no, please describe the technician feedback process in detail and provide any documentation developed in connection with this process.
- b. Provide copies of all reports or other feedback that have been submitted by technicians in conjunction with this technician feedback process since the process began.

Dated: September 16, 2010.



KARLY BARAGA WERNER
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October 1, 2010

Via Electronic Mail and Messenger

Gregory R. Merz Esq.
Gray, Plant, Mooty
500 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

Re: In the Matter of the Joint Petition for Approval of Indirect Transfer of Control of
Qwest Operating Companies to CenturyLink
OAH Docket No. 11-2500-21391-2
MPUC Docket No. P-421, et al./PA-10-456

Dear Mr. Merz:

In response to your letter of September 27, 2010, attached find CenturyLink's Supplemental Responses to Integra's Third Set of Information Requests.

CenturyLink has also supplemented its response to Information Request 8 and 9 of this set of Integra requests and has provided those supplemental responses herein.

Best regards,

A handwritten signature in black ink, appearing to be "KBW", written over a circular line. Below the signature, the name "Karly Baraga Werner" is printed.

KBW/aj
Enclosures

CC: Counsel to Interveners

DORSEY & WHITNEY LLP • WWW.DORSEY.COM • T 612.340.2600 • F 612.340.2868
SUITE 1500 • 50 SOUTH SIXTH STREET • MINNEAPOLIS, MINNESOTA 55402-1498
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6. Has any vendor or gateway provider (e.g., DSET or Synchronoss) that represents a CLEC or CLECs indicated that they have CLEC customers who want ebonding relating to the processing or potential processing of ASRs? If your answer is "Yes":

- a. Identify each vendor or gateway provider with whom CenturyLink has had such communications;
- b. State the date of each such communications;
- c. Identify each CenturyLink and Qwest employee or representative who participated in such communications.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written and, as such, is not relevant or likely to lead to the discovery of admissible evidence in this proceeding. In addition, CenturyLink objects to this request to the extent it applies to matters other than Minnesota intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the request to the extent that it calls for information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink's capabilities related to ebonding for ASRs, but has not received any formal requests.

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: The inquiries that CenturyLink has received from vendors or gateway providers regarding CenturyLink's capabilities for ASRs were informal discussions that were informational in nature. Because of the informal nature of these inquiries, no notes were taken and no other documentation exists regarding these inquiries.

Sponsor: Melissa Closz, Director Wholesale Operations

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7. Has any vendor or gateway provider (e.g., DSET or Synchronoss) that represents a CLEC or CLECs indicated that they have CLEC customers who want ebondding relating to the processing or potential processing of LSRs? If your answer is "Yes":

- a. Identify each vendor or gateway provider with whom CenturyLink has had such communications;
- b. State the date of each such communications;
- c. Identify each CenturyLink and Qwest employee or representative who participated in such communications.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written and, as such, is not relevant or likely to lead to the discovery of admissible evidence in this proceeding. In addition, CenturyLink objects to this request to the extent it applies to matters other than Minnesota intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the request to the extent that it calls for information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink's capabilities related to ebondding for LSRs, but has not received any formal requests.

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: The inquiries that CenturyLink has received from vendors or gateway providers regarding CenturyLink's capabilities for LSRs were informal discussions that were informational in nature. Because of the informal nature of these inquiries, no notes were taken and no other documentation exists regarding these inquiries.

Sponsor: Melissa Closz, Director Wholesale Operations

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8. Please indicate whether, after all of the systems of the Merged Company have been consolidated, the interface that the Merged Company will provide will support a UOM interface for ASRs.

CenturyLink Response: Yes, after the systems of the company have been consolidated after the merger, the company intends to support a UOM interface for ASRs.

CenturyLink Supplemental Response:

CenturyLink clarifies that no decisions have been made regarding the potential consolidation of systems after the merger.

Sponsor: Melissa Closz, Director Wholesale Operations

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9. Please indicate whether, after all of the systems of the Merged Company have been consolidated, the interface that the Merged Company will provide will support a UOM interface for LSRs.

CenturyLink Response: Yes, after the systems of the company have been consolidated after the merger, the company intends to support a UOM interface for LSRs.

CenturyLink Supplemental Response:
CenturyLink clarifies that no decisions have been made regarding the potential consolidation of systems after the merger.

Sponsor: Melissa Closz, Director Wholesale Operations

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13. Which of the following pre-order functions does CenturyLink currently provide with EASE? For each subpart below, state whether the order type is available for ASRs, LSRs, or both and whether the interface is application to application, GUI, or both. To the extent you are unclear about the service or product being described, please see Qwest's PCAT and ICAs regarding these items:

- a. Address validation
- b. Channel Facility Assignment (CFA) Validation
- c. Meet Point Query Validation
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation
- e. Raw Loop Data Validation at least for service and products that Qwest provides
- f. Billing Account Number (BAN) Validation
- g. Customer Service Records (CSR)
- h. Telephone Number(s) (TNs) Reservation
- i. Provide Facility Availability
- j. Provide Service Availability
- k. Loop Qualification for Integrated Services Digital Network (ISDN)
- l. Loop Qualification for Unbundled Asymmetric Digital Subscriber Line (ADSL)
- m. Loop Qualification for Commercial Broadband Services
- n. Appointment Scheduling

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to provide a clear explanation of the services or products described.

CenturyLink's Response:

Subject to and without waiving its objections, CenturyLink provides the following response:

- a. Address validation - Yes
- b. Channel Facility Assignment (CFA) Validation - Yes
- c. Meet Point Query Validation - No, not at this time
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation - Yes
- e. Raw Loop Data Validation at least for service and products that Qwest provides - No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- f. Billing Account Number (BAN) Validation - Yes

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- g. Customer Service Records (CSR) - Yes
- h. Telephone Number(s) (TNs) Reservation – No, not as part of the pre-order function. However this function is available in EASE.
- i. Provide Facility Availability – No. We validate if an address is valid in preorder. Availability is determined upon submission of a firm order.
- j. Provide Service Availability –Yes, not as part of the pre-order function.
- k. Loop Qualification for Integrated Services Digital Network (ISDN) – No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- l. Loop Qualification for Unbundled Asymmetric Digital Subscriber Line (ADSL) –No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- m. Loop Qualification for Commercial Broadband Services –No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- n. Appointment Scheduling – No, not as part of the pre-order function. A firm order has to be submitted before an appointment can be scheduled.

CenturyLink Supplemental Response:

For the following pre-order functions that CenturyLink provides with EASE, the following response provides whether the order type is available for ASRs and LSRs and whether the interface is application to application or GUI:

- a. Address validation – Available for both ASR and LSR and the interface is both GUI and application-to-application.
- b. Channel Facility Assignment (CFA) Validation – Available for ASR and is under development for LSR. GUI and application to application interfaces are available for ASRs and will be available for LSRs.
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation – No. Codes may be validated via online reference tables outside of the process to populate an ASR or LSR.
- f. Billing Account Number (BAN) Validation – Available for both ASR and LSR and the interface is both GUI and application-to-application
- g. Customer Service Records (CSR) – Available for LSR and the interface is both GUI and application to application
- j. Provide Service Availability –No, not as part of the pre-order function, but is available as part of the order process.

Sponsor: Melissa Closz, Director Wholesale Operations

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14. Which of the following order types does CenturyLink provide using EASE? If an order type cannot be performed in EASE then please provide information regarding how a CLEC places that order type such as via facsimile or via e-mail. For each subpart below, state whether the order type is available for ASRs, LSRs, or both and whether the interface is application to application, GUI, or both. To the extent you are unclear about the service or product being described, please see Qwest's PCAT and ICAs regarding these items.

- a. Unbundled Loop
- b. Unbundled Subloop:
 - i. Unbundled Feeder Loop
 - ii. Unbundled Distribution Loop
- d. Local Number Portability
- e. Loop with Number Port
- f. Unbundled Distribution Loop with Number Portability
- j. Directory listing
- k. Resale Private Line
- l. Resale POTS
- m. Resale Public Access Line (PAL)
- n. Resale PBX
- o. Resale ISDN
- p. Resale Designed Trunks
- q. Resale Frame Relay
- r. Resale DID In Only Trunks
- s. Commercial DSL (Broadband for Resale)
- t. Unbundled Analog Line Side Switch Port
- u. Unbundled Analog Line Side Switch Port ISDN BRI Capable
- v. Unbundled Analog DID/PBX Trunk Port
- w. Unbundled DSI DID/PBX Trunk or Trunk Port Facility
- x. UNEP ISDN BRI
- y. UNEP POTS
- z. UNEP Centrex
- aa. UNEP Centrex 21
- bb. UNE-P DSS Facility
- cc. UNE-P DSS Trunk
- dd. UNE-P PRI ISDN Facility
- ee. UNE-P PRI ISDN Trunk
- ff. UNE-P PBX DID In-Only Trunk
- gg. UNE-P PBX Design Trunk
- hh. EEL/UNE Combination

CenturyLink Objections:

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CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to provide a clear explanation of the services or products described.

CenturyLink Response: Subject to and without waiving its objections, CenturyLink provides the following response: EASE supports all wholesale order types that are in the CenturyLink portfolio. The guides to CenturyLink products and processes can be found at its website by following the instructions below:

www.centurylink.com

Click on Wholesale in the upper right

In the green box to the right, click on CLEC Services

Under Guides & Demos, Click on Products & Process

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: EASE supports all order types available from CenturyLink customers for both ASRs and LSRs. The interface for placing orders for ASR and LSR is available via application to application or GUI.

Sponsor: Melissa Closz, Director Wholesale Operations

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16. Does CenturyLink or the system called EASE currently impose volume or other limitations that require a CLEC to submit a manual LSR via facsimile or via e-mail for an order type typically accepted by the EASE system? For example, the EASE System may normally process a Number Port order type but it may not allow the CLEC to submit a range of DIDs on a single order in EASE and therefore requires a CLEC to manually submit that Number Port order. If any orders are treated as a project, please describe the criteria for the project (e.g., number of numbers requiring project handling) and state whether orders treated as a project are submitted via EASE or manually. In either case, is any aspect of the processing of the order is manual?

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous, overbroad and imprecise.

CenturyLink Response: Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink does not impose a volume limit on the number of orders placed through the EASE system. Large orders of several hundred numbers are typically treated as a project. All projects can be submitted electronically through EASE. There are no requirements to submit a manual order for a project.

CenturyLink Supplemental Response:

CenturyLink defines a project as a planned event where terms and conditions for the work performed is agreed upon by both the Wholesale Customer, CenturyLink and any other party engaged in the provisioning process. To allow for successful turn-up or conversion of services/facilities, each party must negotiate, in good faith, the timelines that allow required activities to be met, equipment ordered, placed and tested to meet the overall objectives of the project. The timeline must meet the rule of reasonable and prudent business practices.

Generally speaking, criteria used when working orders as a project for designed services are:

- Over 10 T-1s
- 3 or more DS-3s
- 25 or more designed DS0s
- Over 240 Switched Trunks
- CFA Rolls

Sonet local services will be coordinated in a separate process.

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General criteria used when working orders as a project for non-designed services are:

- | | |
|---|-----|
| • Resale (New Install/Convert/Migrations) | 25 |
| • UNE-P (New Install/Convert/Migrations) | 25 |
| • Loop (Install/Convert) | 25 |
| • Port (Port Lines) | 200 |

Each individual project is by definition negotiated and coordinated with the customer. Questions regarding project coordination and determination should be referred to the customer's account manager.

Sponsor: Melissa Closz, Director Wholesale Operations

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19. If not, is this functionality currently being evaluated and, if so, identify any dates or timeframes being evaluated. Please provide any documents, including any EASE LSR development roadmaps referring to such evaluation of prepopulation of the LSR.

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to identify what is referenced by "this functionality."

CenturyLink's Response:

Subject to and without waiving its objections, CenturyLink assumes that Integra intends to reference the functionality described in IR-18 and provides the following response: This functionality is on the EASE/LSR development roadmap and is currently being evaluated.

CenturyLink Supplemental Response:

CenturyLink has opened an internal project request for pre-population of LSRs. The project completed the high level requirements phase and business requirements have been completed. A high level, level of effort (LOE) has been completed and the project is in the approval process. Following approval, during the normal project approval process, the project will progress through the normal development and testing phases and a target implementation date will be set. CenturyLink will provide customer notification consistent with existing timelines and practices once a target implementation date has been set for this project.

Sponsor: Melissa Closz, Director Wholesale Operations

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27. Please refer to CenturyLink-Qwest Update #5, dated August 10, 2010. Update #5 shows that three consulting firms are assisting with integration planning efforts: (i) PricewaterhouseCoopers (for overall integration coordination), (ii) Bain & Company (for organization design) and (iii) Hewitt Associates (for compensation). Separately for each consulting firm, provide the following:

- a. A detailed description of the activities each firm has performed for CenturyLink and/or Qwest to date.
- b. A detailed description of the activities each firm will be performing for CenturyLink and/or Qwest in the future related to the proposed transaction.
- c. Any instructions, proposed work plan, or similar direction (written or oral) provided by CenturyLink and/or Qwest to each firm in relation to the firms' assisting the Joint Applicants with integration planning.
- d. Any recommendations, findings or responses (written or oral) provided to CenturyLink and/or Qwest by each of the firms in relation to their role of assisting Joint Applicants with integration planning.
- e. Identify the personnel (name, title and employer) from CenturyLink and/or Qwest that are point(s) of contact for each of the three firms in relation to the firms' integration planning assistance.
- f. Identify the personnel (name, title and employer) from the consulting firms that are point(s) of contact for CenturyLink and/or Qwest in relation to the firms' integration planning assistance.
- g. This request is ongoing, and CenturyLink/Qwest should update their responses to this request as additional information becomes available.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written and, as such, is not relevant or likely to lead to the discovery of admissible evidence in this proceeding. CenturyLink further objects to the request to the extent that it calls for information that is, and the production of documents that contain, third-party proprietary information which is subject to a confidentiality agreement. Specifically, the requests for any written

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or oral communications between CenturyLink and the identified firms, as well as the identification of personnel for CenturyLink and the firms, and the stipulation that CenturyLink must continually update this information are exceedingly broad and impose excessive burdens on CenturyLink, as well as require the production of extraordinarily confidential information regarding CenturyLink's business operations. The breadth, burden and confidential nature of the requested information far exceed the potential value of the information, if any, to Integra.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response:

- a. The activities each firm has performed for CenturyLink are:

PriceWaterhouseCoopers:

- o Supported CenturyLink in establishing the Integration Management Office, and related processes and tools
- o Designed the functional integration team structure and the assignment of resources and roles, including the initial training of teams on the integration process and supporting toolset.
- o Conducting functional integration planning kick-off and related workshops to launch integration work plan development.
- o Reviewing the blueprints and project plans prepared by the functional integration teams, to begin evaluating the content of such plans and defined timeframes. This includes initiating the process of rationalizing and prioritizing integration initiatives, and developing a master integration schedule and plan.

Bain and Company:

- o Designed tools and processes to guide leadership team in defining organization structure
- o Designed quantitative survey to measure leadership values, decision making effectiveness, and alignment

Hewitt & Associates:

- o Provide compensation benchmarking
- o Propose position titles, job grades and compensation

- b. The activities each firm will be performing in the future for CenturyLink related to the proposed transaction are:

PriceWaterhouseCoopers:

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- Coordinating across functional teams the alignment of the current business architectures with the detailed functional blueprints prepared for integration.
- Defining high level operating models for Day 1, interim state and desired future state outcomes,
- Developing the Roadmap of key integration and transformation initiatives required to close gaps needed to progress towards defined operating models.

Bain and Company:

- Provide training in boundary decisions to document where work gets done functions so this activity can be carried forward in remaining organization design processes
- Transition of tools and processes defined for remaining organization design.

Hewitt & Associates:

Completion of compensation benchmarking

c.-g. See objections.

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: CenturyLink has had a number of discussions with each of the firms regarding the activities each firm will perform. Please see CenturyLink's original response to subparts (a) and (b) to this question. Please see Attachment Supplemental Integra-27 for examples of the types of reports that each firm will provide to CenturyLink. This attachment is trade secret.

Sponsor: Jeff Glover, Vice President Regulatory Operations and Policy

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28. Please indicate whether CenturyLink instituted a technician feedback process since consummation of the CenturyTel/Embarq merger. For reference purposes, please see page 11, lines 13-14 of the testimony of Jasper Gurganus on behalf of CWA in Minnesota Docket P-421, et al./PA-10-456.

- a. If the answer is anything other than an unequivocal no, please describe the technician feedback process in detail and provide any documentation developed in support of this process.
- b. Provide copies of all reports that have been submitted by technicians in conjunction with this technician feedback process since the process began.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written and, as such, is not relevant or likely to lead to the discovery of admissible evidence in this proceeding. In addition, CenturyLink objects to this request to the extent it applies to matters other than Minnesota intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response:

When a legacy Embarq market converts to the Ensemble system, command centers are established and staffed with people knowledgeable of the new systems at the local management group level as well as regional and national levels. Any issues the technicians experience at conversion are reported to the command centers for immediate resolution or logging for additional investigation, analysis and resolution. The feedback from the technicians comes through the command centers immediately and reviewed in total on a daily basis. Issues identified as needing further investigation and resolution are assembled and responsibility to address the identified issues assigned to a party responsible for bringing about resolution. Common issues regarding processes are communicated to applicable support teams.

The system from which the technicians receive their work orders provides a technician feedback form for every job worked by the technician. The technician can report any issues or problems associated with the specific work order. There is a section in the form where the technician can provide any information on problems encountered or any other relevant information regarding the work order. The feedback received from these forms

**MINNESOTA PUBLIC UTILITIES COMMISSION
DOCKET NO. P-421 et al./PA-10-456
INTEGRA'S THIRD SET OF INFORMATION REQUESTS
CENTURYLINK'S RESPONSES**

is accumulated and sorted based on the situation and issues being reported. Information is provided to functional areas to review for possible records issues, process issues or specific coaching or training needed to individuals.

In addition, feedback from the technicians regarding any problems encountered happens daily. Supervisors, managers and others routinely have meetings and communications with technicians regarding any issues the technicians are experiencing.

CenturyLink has also included technicians in the verification of plant records for upcoming market conversions. The technicians physically go out to plant devices and review the plant records, comparing those plant records with the information in CenturyLink's systems. This process allows the technicians to provide feedback regarding the conversion process.

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: The technician feedback form has existed for years and has always allowed a mechanism for technician feedback. During market conversions, the CenturyLink command centers and other manual exception reporting tools were in place to capture real time technician feedback. In September 2010, CenturyLink further enhanced the feedback process by instituting a specialized reporting mechanism focused on conversions into the technician feedback template. This enhancement better automates the feedback process specific to possible conversion issues and should help quickly identify conversion related issues quickly.

Attachments Integra Supplemental-28a and 28b provides documentation on the technician feedback process for CenturyLink during and after market conversions to Ensemble. These attachments are trade secret.

As the Minnesota market has not yet undergone the conversion to the Ensemble system, no Minnesota technician feedback conversion reports are available.

Sponsor: Duane Ring, President Northeast Region

Suite 2300
1300 SW Fifth Avenue
Portland, OR 97201-5630

Mark Trincherro
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September 27, 2010

VIA E-MAIL and REGULAR MAIL

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Re: Oregon PUC Docket No. UM-1484– Joint CLECs¹ Data Requests JC-166 through JC-189

Dear Ms. Young and Messrs. Hendricks and Duarte:

By letter dated September 16, 2010, the Joint CLECs served upon Qwest and CenturyLink in the above-referenced matter, Data Requests JC-166 through JC-189. Responses to those data requests are due no later than September 30, 2010. These same data requests had been previously served upon the Joint Applicants in the Minnesota merger proceeding, MNPUC Docket No. P-421, et al/PA-10-456, as “Integra’s Third Set of Information Requests.” CenturyLink provided responses to Integra’s Third Set of Information Requests in the Minnesota proceeding by letter dated September 23, 2010. By letter dated September 27, 2010, Mr. Merz, Integra’s counsel in the Minnesota proceeding, and co-counsel in this proceeding, sent a notice of material deficiencies letter to Mr. Ahern, on behalf of CenturyLink, setting forth with specificity the deficiencies along with a demand that CenturyLink supplement its responses with the additional information necessary to cure each deficiency. A copy of that letter is attached.

While the responses to the Joint CLECs Integra’s Data Requests JC-166 through JC-189 in this proceeding are not due until September 30, 2010, by this letter, I wish to inform you that

¹ Joint CLECs: XO Communications Services, Inc., tw telecom of oregon, llc, Integra Telecom of Oregon, Inc., Integra Telecom of Oregon, Inc., Advanced TelCom, Inc., Electric Lightwave, LLC, Eschelon Telecom of Oregon, Inc., Oregon Telecom Inc., and United Telecommunications Inc. d/b/a Unicom, Covad Communications Company, PriorityOne Telecom, Inc., & Charter Fiberlink OR–CCVII, LLC.

September 27, 2010
Page 2

the Joint CLECs will deem responses equivalent to those provided in Minnesota on September 23, 2010 to be materially deficient for purposes of this proceeding as well. Therefore, we request that you provide with your responses due September 30, 2010, all of the additional information that Integra has specified is needed to cure the deficiencies in the Minnesota responses.

For your convenience, the following is a numbering guide with which to associate the relevant data requests in this proceeding with those referenced in Mr. Merz's letter of September 27, 2010 in the Minnesota proceeding.

Minnesota 3 rd Set of Information Requests No.	Joint CLEC Data Request No.
1	166
2	167
3	168
6	169
7	170
12	177
13	178
14	179
16	181
18	182
19	183
27	188
28	189

September 27, 2010
Page 3

If you have any questions, please feel free to contact me at (503) 778-5318, or my co-counsel Mr. Merz at (612) 632-3257. Thank you in advance to your attention to this matter.

Very truly yours,

Davis Wright Tremaine LLP

Mark Trincherro, Of Attorneys for Joint CLECs

Enclosure

cc: Greg Merz — gregory.merz@gpmlaw.com

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 166
Response Date: September 30, 2010

Joint CLECs Data Request No. 166:

Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding processing or potential processing of Access Service Requests (ASRs) to occur after the Closing Date and/or systems integration or potential systems integration and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication.
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative, who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant to this proceeding. CenturyLink further objects to the request to the extent that it seeks information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has not communicated with any vendors or service bureaus regarding systems and/or integration plans for the processing or potential processing of LSRs after the closing date of the merger.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 167
Response Date: September 30, 2010

Joint CLECs Data Request No. 167:

Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding processing or potential processing of Local Service Requests (LSRs) to occur after the Closing Date and/or systems integration or potential systems integration and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication;
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant to this proceeding. CenturyLink further objects to the request to the extent that it seeks information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has not communicated with any vendors or service bureaus regarding systems and/or integration plans for the processing or potential processing of ASRs after the closing date of the merger.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 168
Response Date: September 30, 2010

Joint CLECs Data Request No. 168:

Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding data mapping, data conversion, or other systems/integration efforts to occur or be completed after the Closing Date and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication;
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication.
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant to this proceeding. CenturyLink further objects to the request to the extent that it seeks information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has not communicated with any vendors or service bureaus regarding systems and/or integration plans for data mapping, data conversion, or other systems/integrations efforts after the closing date of the merger.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484

Response to Joint CLECs Data Request No. 169

Response Date: September 30, 2010

Joint CLECs Data Request No. 169:

Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e- bonding with CenturyLink, or with the Merged Company after integration of systems with Qwest, relating to the processing or potential processing of ASRs? If your answer is in the affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication, and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant to this proceeding. CenturyLink further objects to the request to the extent that it seeks information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink's capabilities related to ebonding for ASRs, but has not received any formal requests.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484

Response to Joint CLECs Data Request No. 170

Response Date: September 30, 2010

Joint CLECs Data Request No. 170:

Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e-bonding with CenturyLink, or with the Merged Company after integration of systems with Qwest, relating to the processing or potential processing of LSRs? If your answer is in the affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication(s), and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication.
- c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant to this proceeding. CenturyLink further objects to the request to the extent that it seeks information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink's capabilities related to e-bonding for LSRs, but has not received any formal requests.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484

Response to Joint CLECs Data Request No. 171

Response Date: September 30, 2010

Joint CLECs Data Request No. 171:

Please indicate whether, after the systems of the Merged Company have been consolidated, the Merged Company will support a Unified Ordering Model (UOM) interface for ASRs.

CenturyLink Response:

Yes, after the systems of the company have been consolidated after the merger, the company intends to support a UOM interface for ASRs.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484

Response to Joint CLECs Data Request No. 172

Response Date: September 30, 2010

Joint CLECs Data Request No. 172:

Please indicate whether, after the systems of the Merged Company have been consolidated, the Merged Company will support a UOM interface for LSRs.

CenturyLink Response:

Yes, after the systems of the company have been consolidated after the merger, the company intends to support a UOM interface for LSRs.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 173
Response Date: September 30, 2010

Joint CLECs Data Request No. 173:

Is the interface that Qwest currently uses to process ASRs for CLECs a UOM interface? If so:

- a. Identify the interface;
- b. State your basis for asserting that the interface is UOM compliant, consistent with Alliance for Telecommunications Industry Solutions (ATIS) guidelines or standards;
- c. Provide Qwest documentation dated or posted before the transaction announcement date indicating that the interface is UOM compliant.

CenturyLink Response:

Please see Qwest's response to JC-173.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 174
Response Date: September 30, 2010

Joint CLECs Data Request No. 174:

Is the interface that Qwest currently uses to process LSRs for CLECs a UOM interface? If so:

- a. Identify the interface;
- b. State your basis for asserting that the interface is UOM compliant, consistent with ATIS guidelines or standards;
- c. Provide Qwest documentation dated or posted before the Merger Announcement Date (April 21, 2010) indicating that the interface is UOM compliant.

CenturyLink Response:

Please see Qwest's response to JC-174.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 175
Response Date: September 30, 2010

Joint CLECs Data Request No. 175:

Is the interface that CenturyLink currently uses to process ASRs for CLECs a UOM interface?
If so:

- a. Identify the interface;
- b. State your basis for asserting that the interface is UOM compliant, consistent with ATIS guidelines or standards;
- c. Provide CenturyLink documentation dated or posted before the transaction announcement date indicating that the interface is UOM compliant.

CenturyLink Response:

- a. Yes, CenturyLink provides two industry standard interfaces for ASR processing today, a UOM compliant interface and a mech spec compliant interface. Both interfaces are part of the EASE ASR application.
- b. CenturyLink's UOM compliance gateway is provided by a third party vendor, Synchronoss. Synchronoss is contracted to provide both a UOM compliant gateway and business rules per ATIS guidelines. CenturyLink reviews the compliance using internal staffs that participate regularly in the ATIS / Ordering and Billing Forum. Interoperability testing is performed for each customer implementation.
- c. CenturyLink does customer specific UOM interoperability testing. Unlike Qwest, however, there is no requirement to maintain documentation stating that the interface is UOM compliant. Therefore, no such documents exist

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 176
Response Date: September 30, 2010

Joint CLECs Data Request No. 176:

Is the interface that CenturyLink currently uses to process LSRs for CLECs a UOM interface? If so:

- a. Identify the interface;
- b. State your basis for asserting that the interface is UOM compliant, consistent with ATIS guidelines or standards;
- c. Provide CenturyLink documentation dated or posted before the Merger Announcement Date (April 21, 2010) indicating that the interface is UOM compliant.

CenturyLink Response:

- d. Yes, CenturyLink provides an industry standard UOM compliant interface, as well as a proprietary batch interface for LSR processing. Both interfaces are part of the EASE LSR application.
- e. CenturyLink's UOM compliance gateway is provided by a third party vendor, Synchronoss. Synchronoss is contracted to provide both a UOM compliant gateway and business rules per ATIS guidelines. CenturyLink reviews the compliance using internal staffs that participate regularly in the ATIS / Ordering and Billing Forum. Interoperability testing is performed for each customer implementation.
- f. CenturyLink does customer specific UOM interoperability testing. Unlike Qwest, however, there is no requirement to maintain documentation stating that the interface is UOM compliant. Therefore, no such documents exist

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 177
Response Date: September 30, 2010

Joint CLECs Data Request No. 177:

CenturyLink has indicated that it uses the EASE system to process LSRs and ASRs, provides access to WebRRS for maintenance and repair or provides the option to use "800" access numbers to reach the appropriate repair center. Please answer the following:

- a. Please provide the name of the software company who developed these systems and the systems integrator who deployed EASE and WebRRS both for legacy Embarq and legacy CenturyLink.
- b. Were either of these systems developed, in whole or part, by Wisor Telecom Corp. (a firm acquired by Synchronoss Technologies, Inc.)? If so, please describe the role of Wisor Telecom Corp.
- c. What role, if any, will Wisor or Synchronoss have after the Closing Date? For example, is Wisor or Synchronoss a selected vendor for LSRs? For ASRs? Have proposals relating to activities that will occur or be completed after the Closing Date been exchanged, or have agreements been entered into that apply to time periods after the closing date? If so, provide any documents evidencing, referring or relating to any such proposal or agreement.

CenturyLink Objections:

CenturyLink objects to the request to the extent that it calls for information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response:

- a. EASE was developed using a software framework developed by a company named Wisor, subsequently purchased by Synchronoss. Back office integration and business rule development was performed by CenturyLink internal IT development. WebRRS is an application internally developed by CenturyLink.
- b. Yes, the underlying software framework was purchased from Wisor. Wisor's role was a support role: mentoring our developers, installing and configuring the software and providing consulting support. All back office integration, business rule development and customization of the application were performed by the CenturyLink internal IT development team. Wisor/Synchronoss did not act as a systems integrator for CenturyLink.
- c. Synchronoss will continue to provide maintenance support for their components of

EASE and will support any enhancement requests to those components as long as CenturyLink continues to utilize EASE. At this time, no decisions have been made with regard to which systems the combined company will use after closing. Further, CenturyLink has not had any discussions with Wisor/Synchronoss regarding post-closing activities, therefore no proposals have been exchanged nor do any documents exist.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 178
Response Date: September 30, 2010

Joint CLECs Data Request No. 178:

Which of the following pre-order functions does CenturyLink currently provide with EASE? For each subpart below, state whether the function is available for ASRs, LSRs, or both and whether the function is available with application-to-application interface (or e-bonding), Graphical User Interface (GUI) interface, or both.

- a. Address validation
- b. Channel Facility Assignment (CFA) Validation
- c. Meet Point Query Validation
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation
- e. Raw Loop Data Validation (at least for pre-order functions, services and products that Qwest currently provides)
- f. Billing Account Number (BAN) Validation
- g. Customer Service Records (CSR)
- h. Telephone Number(s) (TNs) Reservation
- i. Provide Facility Availability
- j. Provide Service Availability
- k. Loop Qualification for Integrated Services Digital Network (ISDN)
- l. Loop Qualification for Unbundled Asymmetric Digital Subscriber Line (ADSL)
- m. Loop Qualification for Commercial Broadband Services
- n. Appointment Scheduling

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to provide a clear explanation of the services or products described.

CenturyLink's Response:

Subject to and without waiving its objections, CenturyLink provides the following response:

- a. Address validation - Yes
- b. Channel Facility Assignment (CFA) Validation - Yes
- c. Meet Point Query Validation – No, not at this time
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation - Yes
- e. Raw Loop Data Validation at least for service and products that Qwest provides – No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- f. Billing Account Number (BAN) Validation - Yes

- g. Customer Service Records (CSR) - Yes
- h. Telephone Number(s) (TNs) Reservation – No, not as part of the pre-order function. However this function is available in EASE.
- i. Provide Facility Availability – No. We validate if an address is valid in preorder. Availability is determined upon submission of a firm order.
- j. Provide Service Availability –Yes, not as part of the pre-order function.
- k. Loop Qualification for Integrated Services Digital Network (ISDN) –No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- l. Loop Qualification for Unbundled Asymmetric Digital Subscriber Line (ADSL) –No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- m. Loop Qualification for Commercial Broadband Services –No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- n. Appointment Scheduling – No, not as part of the pre-order function. A firm order has to be submitted before an appointment can be scheduled.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 179
Response Date: September 30, 2010

Joint CLECs Data Request No. 179:

Which of the following order types does CenturyLink provide using EASE? If an order type cannot be performed in EASE, then please provide information regarding how a CLEC places that order type (e.g., via facsimile or via e-mail) For each subpart below, state whether the order type is available for ASRs, LSRs, or both and whether the order type is available with application-to-application interface (or e-bonding), GUI interface, or both. To the extent you are unclear about the order type, service, or product, please see Qwest's PCAT and ICAs regarding the item in each subpart.

- a. Unbundled Loop
- b. Unbundled Subloop:
 - i. Unbundled Feeder Loop
 - ii. Unbundled Distribution Loop
- c. Local Number Portability
- d. Loop with Number Port
- e. Unbundled Distribution Loop with Number Portability
- f. Directory listing
- g. Resale Private Line
- h. Resale POTS
- i. Resale Public Access Line (PAL)
- j. Resale PBX
- k. Resale ISDN
- l. Resale Designed Trunks
- m. Resale Frame Relay
- n. Resale DID In Only Trunks
- o. Commercial DSL (Broadband for Resale)
- p. Unbundled Analog Line Side Switch Port
- q. Unbundled Analog Line Side Switch Port ISDN BRI Capable
- r. Unbundled Analog DID/PBX Trunk Port
- s. Unbundled DS1 DID/PBX Trunk or Trunk Port Facility
- t. UNEP ISDN BRI
- u. UNEP POTS
- v. UNEP Centrex
- w. UNEP Centrex 21
- x. UNE-P DSS Facility
- y. UNE-P DSS Trunk
- z. UNE-P PRI ISDN Facility
- aa. UNE-P PRI ISDN Trunk
- bb. UNE-P PBX DID In-Only Trunk
- cc. UNE-P PBX Design Trunk
- dd. EEL/UNE Combination

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to provide a clear explanation of the services or products described. In addition, the request is unduly burdensome; the information sought is publicly available.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: EASE supports all wholesale order types that are in the CenturyLink portfolio. The guides to CenturyLink products and processes can be found at its website by following the instructions below:

www.centurylink.com

Click on Wholesale in the upper right

In the green box to the right, click on CLEC Services

Under Guides & Demos, Click on Products & Process

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 180
Response Date: September 30, 2010

Joint CLECs Data Request No. 180:

For any of the above in Request Numbers 13 and 14 for which CenturyLink's answer is in the negative (indicating that CenturyLink does not currently provide the function or order type using EASE or does not have a current offering):

- a. Does CenturyLink have any plans to offer the function or order type via an application-to-application interface (or e-bonding), GUI interface, or both, after the Closing Date? If so, please describe.
- b. Does the availability of the function or order type after the Closing Date depend on the system that will be used after any consolidation of systems? If so, please explain.

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to specifically identify what is referenced by the offerings "above."

CenturyLink's Response:

Subject to and without waiving its objections, CenturyLink assumes that Integra is referring to JC-179 and provides the following response: There will be no immediate changes to the available CenturyLink order types after the closing of the merger. No decisions have been made regarding the systems the combined company will use going forward.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 181
Response Date: September 30, 2010

Joint CLECs Data Request No. 181:

Does CenturyLink or the system called EASE currently impose volume or other limitations that require a CLEC to submit its service request manually (e.g., via facsimile or via e-mail) for an order type typically accepted by the EASE system? For example, the EASE System may normally process a Number Port order type but it may not allow the CLEC to submit a range of Direct Inward Dials (DIDs) on a single order in EASE and therefore requires a CLEC to manually submit that Number Port order. Additionally, if any orders are treated as a project, please describe the criteria for the project (e.g., number of telephone numbers for which CenturyLink requires project handling) and state whether orders treated as a project are submitted via EASE or manually. In any case, identify if any aspect of the processing of the order is manual.

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous, overbroad and imprecise.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink does not impose a volume limit on the number of orders placed through the EASE system. Large orders of several hundred numbers are typically treated as a project. All projects can be submitted electronically through EASE. There are no requirements to submit a manual order for a project.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 182
Response Date: September 30, 2010

Joint CLECs Data Request No. 182:

During LSR processing, when one or more errors occur, please describe the EASE validation process and specifically indicate, when multiple errors occur, whether EASE presents back to the CLEC user all identified errors at one time, or, if not, in what sequence and with what timing are the errors presented back to the CLEC user?

- a. Is this information communicated to CLEC as an upfront edit before LSR acceptance?
If not, please describe how it is processed and presented to CLEC.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written, seeks information that is not relevant and is not reasonably calculated to lead to the discovery of admissible.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: The user has the ability to validate the order in two different ways. First, the user may validate the entire order at any time during the order entry process. Second, the user can validate when the order is completed and submitted for processing, at which time the entire LSR will be validated and all errors identified. The user may also execute an address validation within the order, separate from the overall order validation.

The edits are processed and presented to the user prior to order acceptance.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 18 [sic]
Response Date: September 30, 2010

Joint CLECs Data Request No. 18[sic]:

Does the system called EASE, as currently implemented by CenturyLink, pre-populate information in the LSR?

CenturyLink Response:

EASE as currently implemented by CenturyLink does not pre-populate information in the LSR. This functionality is on the EASE/LSR development roadmap and is currently being evaluated.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 183
Response Date: September 30, 2010

Joint CLECs Data Request No. 183:

If the response to Request Number 18 is in the negative (no), is the pre-population of information functionality currently being evaluated and, if so, identify any dates or timeframes that have or are being considered or evaluated. Please provide any documents, including any EASE/LSR development roadmap(s), referring or relating to evaluation of pre- population of information.

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to identify what is referenced by "this functionality."

CenturyLink's Response:

Subject to and without waiving its objections, CenturyLink assumes that Integra intends to reference the functionality described in IR-18 and provides the following response: This functionality is on the EASE/LSR development roadmap and is currently being evaluated.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 184
Response Date: September 30, 2010

Joint CLECs Data Request No. 184:

Has CenturyLink declined, put off until later, or otherwise delayed fulfillment of any request from any carrier for use of an application-to-application interface or e- bonding relating to processing of ASRs? If so:

- a. Identify each carrier;
- b. State the date the request was made;
- c. State the city and state for which the request was made;
- d. State each reason (e.g., rural carrier status or any other reason) why CenturyLink declined, put off, or delayed fulfillment of the request.

CenturyLink Objections:

CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the request to the extent that it calls for information that is, and the production of documents that contain, third-party proprietary information which is subject to a confidentiality agreement and may be confidential carrier info that may not be disclosed under 47 U.S.C. 222(b).

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has received two requests for application to application ebonding (UOM). One request has been implemented on schedule as requested. The other is being implemented based on the timeframe requested by the customer.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 185
Response Date: September 30, 2010

Joint CLECs Data Request No. 185:

Has CenturyLink declined, put off until later, or otherwise delayed fulfillment of any request from any carrier for use of an application-to-application interface or e- bonding relating to processing of LSRs? If so:

- a. Identify each carrier;
- b. State the date the request was made;
- c. State the city and state for which the request was made;
- d. State each reason (e.g., rural carrier status or any other reason) why CenturyLink declined, put off, or delayed fulfillment of the request.

CenturyLink Objections:

CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission because such matters are irrelevant and the request is not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the request to the extent that it calls for information that is third-party proprietary information which is subject to a confidentiality agreement and may be confidential carrier info that may not be disclosed under 47 U.S.C. 222(b).

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has not received any formal requests for application to application (UOM) ebonding for LSRs.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 186
Response Date: September 30, 2010

Joint CLECs Data Request No. 186:

Will CenturyLink, after the Closing Date, terminate, not renew, or otherwise discontinue any license agreement relating to any software used in connection with any service used or requested by CLECs and provided by CenturyLink, either in legacy Qwest or legacy CenturyLink territory (e.g., software relating to Centrex Mate Service or Centron)? If so:

- a. Identify the software;
- b. Identify the service that CLECs use the software to access;
- c. Describe in detail any CenturyLink's plans to terminate, not renew, or otherwise discontinue any license agreement, including dates of anticipated termination or nonrenewal.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written, seeks information that is not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the request to the extent that it calls for information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink does not anticipate any immediate changes to CLEC systems or the associated software after the closing of the merger. Integration planning is in the early states and no decisions have been made at this time. CenturyLink anticipates separately operating the CenturyLink CLEC and Qwest CLEC OSS systems in their respective service areas for a minimum of 12 months following the closing of the merger. During this time, CenturyLink will conduct a proper evaluation of all systems in an orderly and disciplined manner, which will allow it to make informed decisions regarding systems that will be used for the combined company.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 187
Response Date: September 30, 2010

Joint CLECs Data Request No. 187:

Has CenturyLink previously terminated, not renewed, or otherwise discontinued any license agreement relating to any software used in connection with any service used or requested by CLECs (e.g., software relating to Centrex Mate Service or Centron)? If so, please indicate whether the related product or service ordered or requested by CLEC(s) remained available to CLEC(s) after CenturyLink terminated, did not renew, or otherwise discontinued any license agreement and, if so, whether the functionality of the product or service remained the same.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the request to the extent that it calls for information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: As a result of the integration of Embarq and CenturyTel applications, the EZLocal application used by CLECs doing business with CenturyTel was retired, as it had no system to system functionality or interfaces to back office applications.

Sponsor: Melissa Closz, Director Wholesale Operations

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 188
Response Date: September 30, 2010

Joint CLECs Data Request No. 188:

Please refer to CenturyLink-Qwest Update #5, dated August 10, 2010.²¹ Update #5 shows that three consulting firms are assisting with integration planning efforts: (i) PricewaterhouseCoopers (for overall integration coordination), (ii) Bain & Company (for organization design) and (iii) Hewitt Associates (for compensation). Separately for each consulting firm, provide the following:

- a. A detailed description of the activities each firm has performed for CenturyLink and/or Qwest to date.
- b. A detailed description of the activities each firm will be performing for CenturyLink and/or Qwest in the future related to the proposed transaction.
- c. Any instructions, proposed work plan, or similar direction (written or oral) provided by CenturyLink and/or Qwest to each firm in relation to the firms' assisting the Joint Applicants with integration planning.
- d. Any recommendations, findings or responses (written or oral) provided to CenturyLink and/or Qwest by each of the firms in relation to their role of assisting Joint Applicants with integration planning.
- e. Identify the personnel (name, title and employer) from CenturyLink and/or Qwest that are point(s) of contact for each of the three firms in relation to the firms' integration planning assistance.
- f. Identify the personnel (name, title and employer) from the consulting firms that are point(s) of contact for CenturyLink and/or Qwest in relation to the firms' integration planning assistance.
- g. This request, as with all the requests, is ongoing, and CenturyLink/Qwest should update their responses to this request as additional information becomes available.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the request to the extent that it calls for information that is, and the production

¹ Available at: <http://www.centurylinkqwestmerger.com/downloads/key-materials/CenturyLink-Qwest%20Update%205.pdf>

of documents that contain, third-party proprietary information which is subject to a confidentiality agreement. Specifically, the requests for any written or oral communications between CenturyLink and the identified firms, as well as the identification of personnel for CenturyLink and the firms, and the stipulation that CenturyLink must continually update this information are exceedingly broad and impose excessive burdens on CenturyLink, as well as require the production of extraordinarily confidential, including third-party, information regarding CenturyLink's business operations. The breadth, burden and confidential nature of the requested information far exceed the potential value of the information, if any, to Integra.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response:

- a. The activities each firm has performed for CenturyLink are:

PriceWaterhouseCoopers:

- Supported CenturyLink in establishing the Integration Management Office, and related processes and tools
- Designed the functional integration team structure and the assignment of resources and roles, including the initial training of teams on the integration process and supporting toolset.
- Conducting functional integration planning kick-off and related workshops to launch integration work plan development.
- Reviewing the blueprints and project plans prepared by the functional integration teams, to begin evaluating the content of such plans and defined timeframes. This includes initiating the process of rationalizing and prioritizing integration initiatives, and developing a master integration schedule and plan.

Bain and Company:

- Designed tools and processes to guide leadership team in defining organization structure
- Designed quantitative survey to measure leadership values, decision making effectiveness, and alignment

Hewitt & Associates:

- Provide compensation benchmarking
- Propose position titles, job grades and compensation

- b. The activities each firm will be performing in the future for CenturyLink related to the proposed transaction are:

PriceWaterhouseCoopers:

- Coordinating across functional teams the alignment of the current business architectures with the detailed functional blueprints prepared for integration.
- Defining high level operating models for Day 1, interim state and desired future state outcomes,

- Developing the Roadmap of key integration and transformation initiatives required to close gaps needed to progress towards defined operating models.

Bain and Company:

- Provide training in boundary decisions to document where work gets done functions so this activity can be carried forward in remaining organization design processes
- Transition of tools and processes defined for remaining organization design.

Hewitt & Associates:

Completion of compensation benchmarking

c.-g. See objections.

Sponsor: John Felz, Director, State Regulatory Operations

Oregon Docket No. UM 1484

Response to Joint CLECs Data Request No. 189

Response Date: September 30, 2010

Joint CLECs Data Request No. 189:

Please indicate whether CenturyLink instituted a technician feedback process since consummation of the CenturyTel/Embarq merger. (For reference purposes, please see page 11, lines 13-14 of the testimony of Jasper Gurganus on behalf of CWA in Minnesota Docket P-421, et al./PA-10-456.)

- a. If the answer is anything other than an unequivocal no, please describe the technician feedback process in detail and provide any documentation developed in connection with this process.
- b. Provide copies of all reports or other feedback that have been submitted by technicians in conjunction with this technician feedback process since the process began.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant and the request would not be reasonably calculated to lead to the discovery of admissible evidence.

Oregon Docket No. UM 1484

Response to Joint CLECs Data Request No. 169

Response Date: September 30, 2010

Joint CLECs Data Request No. 169:

Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e-bonding with CenturyLink, or with the Merged Company after integration of systems with Qwest, relating to the processing or potential processing of ASRs? If your answer is in the affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication, and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant to this proceeding. CenturyLink further objects to the request to the extent that it seeks information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink's capabilities related to e-bonding for ASRs, but has not received any formal requests.

Sponsor: Melissa Closz, Director Wholesale Operations

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: The inquiries that CenturyLink has received from vendors or gateway providers regarding CenturyLink's capabilities for ASRs were informal discussions that were informational in nature. Because of the informal nature of these inquiries, no notes were taken

and no other documentation exists regarding these inquiries.

Sponsor: Melissa Closz, Director Wholesale Operations
Supplemental Response Date: October 5, 2010

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 170
Response Date: September 30, 2010

Joint CLECs Data Request No. 170:

Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e-bonding with CenturyLink, or with the Merged Company after integration of systems with Qwest, relating to the processing or potential processing of LSRs? If your answer is in the affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication(s), and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication.
- c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome, seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, CenturyLink objects to this request to the extent it applies to matters other than Oregon intrastate operations subject to the jurisdiction of the Commission as such matters are irrelevant to this proceeding. CenturyLink further objects to the request to the extent that it seeks information that is third-party proprietary information which is subject to a confidentiality agreement.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink has received several inquiries from vendors or gateway providers regarding CenturyLink's capabilities related to ebonding for LSRs, but has not received any formal requests.

Sponsor: Melissa Closz, Director Wholesale Operations

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: The inquiries that CenturyLink has received from vendors or gateway providers regarding CenturyLink's capabilities for LSRs were informal discussions that were informational in nature. Because of the informal nature of these inquiries, no notes were taken and no other

documentation exists regarding these inquiries.

Sponsor: Melissa Closz, Director Wholesale Operations
Supplemental Response Date: October 5, 2010

Oregon Docket No. UM 1484

Response to Joint CLECs Data Request No. 171

Response Date: September 30, 2010

Joint CLECs Data Request No. 171:

Please indicate whether, after the systems of the Merged Company have been consolidated, the Merged Company will support a Unified Ordering Model (UOM) interface for ASRs.

CenturyLink Response:

Yes, after the systems of the company have been consolidated after the merger, the company intends to support a UOM interface for ASRs.

Sponsor: Melissa Closz, Director Wholesale Operations

CenturyLink Supplemental Response:

CenturyLink clarifies that no decisions have been made regarding the potential consolidation of systems after the merger.

Sponsor: Melissa Closz, Director Wholesale Operations

Supplemental Response Date: October 5, 2010

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 172
Response Date: September 30, 2010

Joint CLECs Data Request No. 172:

Please indicate whether, after the systems of the Merged Company have been consolidated, the Merged Company will support a UOM interface for LSRs.

CenturyLink Response:

Yes, after the systems of the company have been consolidated after the merger, the company intends to support a UOM interface for LSRs.

Sponsor: Melissa Closz, Director Wholesale Operations

CenturyLink Supplemental Response:

CenturyLink clarifies that no decisions have been made regarding the potential consolidation of systems after the merger.

Sponsor: Melissa Closz, Director Wholesale Operations
Supplemental Response Date: October 5, 2010

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 178
Response Date: September 30, 2010

Joint CLECs Data Request No. 178:

Which of the following pre-order functions does CenturyLink currently provide with EASE? For each subpart below, state whether the function is available for ASRs, LSRs, or both and whether the function is available with application-to-application interface (or e-bonding), Graphical User Interface (GUI) interface, or both.

- a. Address validation
- b. Channel Facility Assignment (CFA) Validation
- c. Meet Point Query Validation
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation
- e. Raw Loop Data Validation (at least for pre-order functions, services and products that Qwest currently provides)
- f. Billing Account Number (BAN) Validation
- g. Customer Service Records (CSR)
- h. Telephone Number(s) (TNs) Reservation
- i. Provide Facility Availability
- j. Provide Service Availability
- k. Loop Qualification for Integrated Services Digital Network (ISDN)
- l. Loop Qualification for Unbundled Asymmetric Digital Subscriber Line (ADSL)
- m. Loop Qualification for Commercial Broadband Services
- n. Appointment Scheduling

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to provide a clear explanation of the services or products described.

CenturyLink's Response:

Subject to and without waiving its objections, CenturyLink provides the following response:

- a. Address validation - Yes
- b. Channel Facility Assignment (CFA) Validation - Yes
- c. Meet Point Query Validation – No, not at this time
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation - Yes
- e. Raw Loop Data Validation at least for service and products that Qwest provides – No, not as part of the pre-order function. This function is provided in pre-

- qualification as part of the LSR process within EASE.
- f. Billing Account Number (BAN) Validation - Yes
- g. Customer Service Records (CSR) - Yes
- h. Telephone Number(s) (TNs) Reservation – No, not as part of the pre-order function. However this function is available in EASE.
- i. Provide Facility Availability – No. We validate if an address is valid in preorder. Availability is determined upon submission of a firm order.
- j. Provide Service Availability – Yes, not as part of the pre-order function.
- k. Loop Qualification for Integrated Services Digital Network (ISDN) – No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- l. Loop Qualification for Unbundled Asymmetric Digital Subscriber Line (ADSL) – No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- m. Loop Qualification for Commercial Broadband Services – No, not as part of the pre-order function. This function is provided in pre-qualification as part of the LSR process within EASE.
- n. Appointment Scheduling – No, not as part of the pre-order function. A firm order has to be submitted before an appointment can be scheduled.

Sponsor: Melissa Closz, Director Wholesale Operations

CenturyLink Supplemental Response:

For the following pre-order functions that CenturyLink provides with EASE, the following response provides whether the order type is available for ASRs and LSRs and whether the interface is application to application or GUI:

- a. Address validation – Available for both ASR and LSR and the interface is both GUI and application-to-application.
- b. Channel Facility Assignment (CFA) Validation – Available for ASR and is under development for LSR. GUI and application to application interfaces are available for ASRs and will be available for LSRs.
- d. Network Channel (NC)/ Network Channel Interface (NCI) Codes Validation – No. Codes may be validated via online reference tables outside of the process to populate an ASR or LSR.
- f. Billing Account Number (BAN) Validation – Available for both ASR and LSR and the interface is both GUI and application-to-application
- g. Customer Service Records (CSR) – Available for LSR and the interface is both GUI and application to application
- j. Provide Service Availability – No, not as part of the pre-order function, but is available as part of the order process.

Sponsor: Melissa Closz, Director Wholesale Operations
 Supplemental Response Date: October 5, 2010

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 179
Response Date: September 30, 2010

Joint CLECs Data Request No. 179:

Which of the following order types does CenturyLink provide using EASE? If an order type cannot be performed in EASE, then please provide information regarding how a CLEC places that order type (e.g., via facsimile or via e-mail) For each subpart below, state whether the order type is available for ASRs, LSRs, or both and whether the order type is available with application-to-application interface (or e-bonding), GUI interface, or both. To the extent you are unclear about the order type, service, or product, please see Qwest's PCAT and ICAs regarding the item in each subpart.

- a. Unbundled Loop
- b. Unbundled Subloop:
 - i. Unbundled Feeder Loop
 - ii. Unbundled Distribution Loop
- c. Local Number Portability
- d. Loop with Number Port
- e. Unbundled Distribution Loop with Number Portability
- f. Directory listing
- g. Resale Private Line
- h. Resale POTS
- i. Resale Public Access Line (PAL)
- j. Resale PBX
- k. Resale ISDN
- l. Resale Designed Trunks
- m. Resale Frame Relay
- n. Resale DID In Only Trunks
- o. Commercial DSL (Broadband for Resale)
- p. Unbundled Analog Line Side Switch Port
- q. Unbundled Analog Line Side Switch Port ISDN BRI Capable
- r. Unbundled Analog DID/PBX Trunk Port
- s. Unbundled DS1 DID/PBX Trunk or Trunk Port Facility
- t. UNEP ISDN BRI
- u. UNEP POTS
- v. UNEP Centrex
- w. UNEP Centrex 21
- x. UNE-P DSS Facility
- y. UNE-P DSS Trunk
- z. UNE-P PRI ISDN Facility
- aa. UNE-P PRI ISDN Trunk
- bb. UNE-P PBX DID In-Only Trunk
- cc. UNE-P PBX Design Trunk
- dd. EEL/UNE Combination

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to provide a clear explanation of the services or products described. In addition, the request is unduly burdensome; the information sought is publicly available.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: EASE supports all wholesale order types that are in the CenturyLink portfolio. The guides to CenturyLink products and processes can be found at its website by following the instructions below:

www.centurylink.com

Click on Wholesale in the upper right

In the green box to the right, click on CLEC Services

Under Guides & Demos, Click on Products & Process

Sponsor: Melissa Closz, Director Wholesale Operations

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: EASE supports all order types available from CenturyLink customers for both ASRs and LSRs. The interface for placing orders for ASR and LSR is available via application to application or GUI.

Sponsor: Melissa Closz, Director Wholesale Operations
Supplemental Response Date: October 5, 2010

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 181
Response Date: September 30, 2010

Joint CLECs Data Request No. 181:

Does CenturyLink or the system called EASE currently impose volume or other limitations that require a CLEC to submit its service request manually (e.g., via facsimile or via e-mail) for an order type typically accepted by the EASE system? For example, the EASE System may normally process a Number Port order type but it may not allow the CLEC to submit a range of Direct Inward Dials (DIDs) on a single order in EASE and therefore requires a CLEC to manually submit that Number Port order. Additionally, if any orders are treated as a project, please describe the criteria for the project (e.g., number of telephone numbers for which CenturyLink requires project handling) and state whether orders treated as a project are submitted via EASE or manually. In any case, identify if any aspect of the processing of the order is manual.

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous, overbroad and imprecise.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response: CenturyLink does not impose a volume limit on the number of orders placed through the EASE system. Large orders of several hundred numbers are typically treated as a project. All projects can be submitted electronically through EASE. There are no requirements to submit a manual order for a project.

Sponsor: Melissa Closz, Director Wholesale Operations

CenturyLink Supplemental Response:

CenturyLink defines a project as a planned event where terms and conditions for the work performed is agreed upon by both the Wholesale Customer, CenturyLink and any other party engaged in the provisioning process. To allow for successful turn-up or conversion of services/facilities, each party must negotiate, in good faith, the timelines that allow required activities to be met, equipment ordered, placed and tested to meet the overall objectives of the project. The timeline must meet the rule of reasonable and prudent business practices.

Generally speaking, criteria used when working orders as a project for designed services are:

- Over 10 T-1s
- 3 or more DS-3s
- 25 or more designed DS0s
- Over 240 Switched Trunks
- CFA Rolls

Sonet local services will be coordinated in a separate process.

General criteria used when working orders as a project for non-designed services are:

- Resale (New Install/Convert/Migrations) 25
- UNE-P (New Install/Convert/Migrations) 25
- Loop (Install/Convert) 25
- Port (Port Lines) 200

Each individual project is by definition negotiated and coordinated with the customer. Questions regarding project coordination and determination should be referred to the customer's account manager.

Sponsor: Melissa Closz, Director Wholesale Operations
Supplemental Response Date: October 5, 2010

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 183
Response Date: September 30, 2010

Joint CLECs Data Request No. 183:

If the response to Request Number 18 is in the negative (no), is the pre-population of information functionality currently being evaluated and, if so, identify any dates or timeframes that have or are being considered or evaluated. Please provide any documents, including any EASE/LSR development roadmap(s), referring or relating to evaluation of pre- population of information.

CenturyLink Objections:

CenturyLink objects to this request because it is vague, ambiguous and imprecise in that it fails to identify what is referenced by "this functionality."

CenturyLink's Response:

Subject to and without waiving its objections, CenturyLink assumes that Integra intends to reference the functionality described in JC-18 and provides the following response: This functionality is on the EASE/LSR development roadmap and is currently being evaluated.

Sponsor: Melissa Closz, Director Wholesale Operations

CenturyLink Supplemental Response:

CenturyLink has opened an internal project request for pre-population of LSRs. The project completed the high level requirements phase and business requirements have been completed. A high level, level of effort (LOE) has been completed and the project is in the approval process. Following approval, during the normal project approval process, the project will progress through the normal development and testing phases and a target implementation date will be set. CenturyLink will provide customer notification consistent with existing timelines and practices once a target implementation date has been set for this project.

Sponsor: Melissa Closz, Director Wholesale Operations
Supplemental Response Date: October 5, 2010

Oregon Docket No. UM 1484
Response to Joint CLECs Data Request No. 188
Response Date: September 30, 2010

Joint CLECs Data Request No. 188:

Please refer to CenturyLink-Qwest Update #5, dated August 10, 2010.²¹ Update #5 shows that three consulting firms are assisting with integration planning efforts: (i) PricewaterhouseCoopers (for overall integration coordination), (ii) Bain & Company (for organization design) and (iii) Hewitt Associates (for compensation). Separately for each consulting firm, provide the following:

- a. A detailed description of the activities each firm has performed for CenturyLink and/or Qwest to date.
- b. A detailed description of the activities each firm will be performing for CenturyLink and/or Qwest in the future related to the proposed transaction.
- c. Any instructions, proposed work plan, or similar direction (written or oral) provided by CenturyLink and/or Qwest to each firm in relation to the firms' assisting the Joint Applicants with integration planning.
- d. Any recommendations, findings or responses (written or oral) provided to CenturyLink and/or Qwest by each of the firms in relation to their role of assisting Joint Applicants with integration planning.
- e. Identify the personnel (name, title and employer) from CenturyLink and/or Qwest that are point(s) of contact for each of the three firms in relation to the firms' integration planning assistance.
- f. Identify the personnel (name, title and employer) from the consulting firms that are point(s) of contact for CenturyLink and/or Qwest in relation to the firms' integration planning assistance.
- g. This request, as with all the requests, is ongoing, and CenturyLink/Qwest should update their responses to this request as additional information becomes available.

CenturyLink Objections:

CenturyLink objects to this Request because it is vague, ambiguous, overly broad, unduly burdensome and excessively time consuming as written, seeks information that is not relevant,

¹ Available at: <http://www.centurylinkqwestmerger.com/downloads/kikey-materials/CenturyLink-Qwest%20Update%205.pdf>

and is not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink further objects to the request to the extent that it calls for information that is, and the production of documents that contain, third-party proprietary information which is subject to a confidentiality agreement. Specifically, the requests for any written or oral communications between CenturyLink and the identified firms, as well as the identification of personnel for CenturyLink and the firms, and the stipulation that CenturyLink must continually update this information are exceedingly broad and impose excessive burdens on CenturyLink, as well as require the production of extraordinarily confidential, including third-party, information regarding CenturyLink's business operations. The breadth, burden and confidential nature of the requested information far exceed the potential value of the information, if any, to Integra.

CenturyLink Response:

Subject to and without waiving its objections, CenturyLink provides the following response:

a. The activities each firm has performed for CenturyLink are:

PriceWaterhouseCoopers:

- Supported CenturyLink in establishing the Integration Management Office, and related processes and tools
- Designed the functional integration team structure and the assignment of resources and roles, including the initial training of teams on the integration process and supporting toolset.
- Conducting functional integration planning kick-off and related workshops to launch integration work plan development.
- Reviewing the blueprints and project plans prepared by the functional integration teams, to begin evaluating the content of such plans and defined timeframes. This includes initiating the process of rationalizing and prioritizing integration initiatives, and developing a master integration schedule and plan.

Bain and Company:

- Designed tools and processes to guide leadership team in defining organization structure
- Designed quantitative survey to measure leadership values, decision making effectiveness, and alignment

Hewitt & Associates:

- Provide compensation benchmarking
- Propose position titles, job grades and compensation

b. The activities each firm will be performing in the future for CenturyLink related to the proposed transaction are:

PriceWaterhouseCoopers:

- Coordinating across functional teams the alignment of the current business architectures with the detailed functional blueprints prepared for integration.
- Defining high level operating models for Day 1, interim state and desired future state outcomes,
- Developing the Roadmap of key integration and transformation initiatives required to close gaps needed to progress towards defined operating models.

Bain and Company:

- Provide training in boundary decisions to document where work gets done functions so this activity can be carried forward in remaining organization design processes
- Transition of tools and processes defined for remaining organization design.

Hewitt & Associates:

Completion of compensation benchmarking

c.-g. See objections.

Sponsor: John Felz, Director, State Regulatory Operations

CenturyLink Supplemental Response:

Subject to and without waiving its objections, CenturyLink provides the following supplemental response: CenturyLink has had a number of discussions with each of the firms regarding the activities each firm will perform. Please see CenturyLink's original response to subparts (a) and (b) to this question. Please see HIGHLY CONFIDENTIAL Attachment JC-188 for examples of the types of reports that the firms will provide to CenturyLink.

Sponsor: John Felz, Director, State Regulatory Operations
 Supplemental Response Date: October 5, 2010

BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 North Robert Street
St. Paul, Minnesota 55101

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
600 Seventh Place East Suite 350
St. Paul, Minnesota 55101-2147

In the Matter of the Joint Petition for Approval
of Indirect Transfer of Control of Qwest
Operating Companies to CenturyLink

MPUC Docket No. P-421, et al/PA-10-456

OAH Docket No. 11-2500-21391

**DECLARATION OF STEPHANIE PRULL IN SUPPORT OF INTEGRA'S MOTION TO
COMPEL**

I, Stephanie Prull, declare as follows:

1. I am an IT Analyst II at Integra Telecom, Inc. ("Integra"). I make this declaration based on personal knowledge, in support of the Integra's Motion to Compel.
2. DSET Corporation ("DSET") is a vendor and gateway provider to Competitive Local Exchange Carriers ("CLECs") for electronic interfaces with Qwest's Operations Support Systems ("OSS").
3. Integra, as a customer of DSET,¹ asked DSET about OSS after any merger between Qwest and CenturyLink and any related systems consolidation and specifically asked about bonding for Local Service Requests ("LSRs").

¹ Integra is in the process of transitioning to Qwest's application-to-application interface (IMA-XML) and currently plans to cut-over to IMA-XML in first quarter of 2011.

4. By way of a response to Integra's inquiries, DSET blind-copied me on a September 1, 2010 email from Jim Seigler of DSET to Mike Norton of CenturyLink (the "DSET email").

5. On information and belief, Mr. Norton works with Melissa Closz, Director Wholesale Operations, in Kansas.²

6. Attached as Attachment A is a true and correct copy of the DSET email.

7. In the DSET email (Attachment A), Mr. Seigler confirms a conversation between DSET and CenturyLink. Mr. Seigler states that, as Mr. Norton of CenturyLink and DSET discussed, after the merger, when all of the systems have been consolidated, the merged company will support a Unified Order Management (UOM) interface for both Access Service Request (ASR) and LSR. Mr. Seigler indicated that DSET has four customers interested in bonding to ASR.

8. In the DSET email (Attachment A), Mr. Seigler also indicates that DSET has seven to ten customers who will want to have an ebonded interface to LSR. Integra is one of those customers. Mr. Seigler asks Mr. Norton of CenturyLink to let DSET "know when that will be available." Integra is one of the customers on whose behalf Mr. Seigler is seeking this information.

DATED this 8th day of October, 2010.

By: 

STEPHANIE PRULL

IT Analyst II

Integra Telecom, Inc.

² Mike Norton is identified on the internet as Group Manager of Client Support in Leawood Kansas (see http://www.jigsaw.com/scid14051163/mike_norton.xhtml?ver=1), and Melissa Closz is, according to her business card, in Overland Park, Kansas. Eumbarq, now a CenturyLink entity, was headquartered in Overland Park, Kansas. See <http://news.centurylink.com/index.php?s=43&item=7>.

From: Jim Seigler [mailto:jseigler@dset.com]
Sent: Wednesday, September 01, 2010 11:04 AM
To: Mike Norton
Cc: Anand Rath; Devang Naik; Sreetal Brahmadevaiah; Vish Emani
Subject: Electronic Interfaces

Mike,

Thanks again for the time today. I have copied our President, our Engineering Managers and our Product Manager on our discussion.

As we discussed when the merger goes through with Qwest and after all the systems have been consolidated then for the 2 companies you will support a UOM interface for both ASR & LSR. You mentioned that today you currently have the UOM and Mech Spec in production for ASR, can you please forward our contact information to the technical people on your side so we can start the discussion for our interested customers (4) to e-bond to the ASR.

We have about 7-10 customers who will want to have an e-bonded interface to LSR so please let me know when that will be available. Until then can you forward our contact info to Christine Foo so we can get a conversation started with her for the batch processes for ports, directory and simple port.

Mike thanks again for your help and we look forward to the next discussion with your team members.

Jim Seigler | Director Sales, Americas | DSET Corporation

jseigler@dset.com | 520 Guthridge Ct | Norcross, GA 30092 | 770.709-7220 | 404-376-6230 (C) | im: jim_seigler@yahoo.com

New Product Announcements

Comptel 2010

Booth 309

September 12-15

Gaylord Convention center, Dallas TX

THIS COMMUNICATION MAY CONTAIN CONFIDENTIAL AND/OR OTHERWISE PROPRIETARY MATERIAL and is thus for use only by the intended recipient. If you received this in error, please contact the sender and delete the e-mail and its attachments from all computers.

ATTACHMENT A

Oregon
UM 1484
XO Communications Services, Inc., tw
telecom of oregon, llc, Integra Telecom
of Oregon, Inc., Advanced TelCom, Inc.,
Electric Lightwave, LLC, Eschelon
Telecom of Oregon, Inc., Oregon
Telecom, Inc., and United
Telecommunications Inc. d/b/a Unicom,
Covad Communications Company,
PriorityOne Telecom, Inc., & Charter
Fiberlink OR-CCVII, LLC 6-166

INTERVENOR: Joint CLECs

REQUEST NO: 166

Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding processing or potential processing of Access Service Requests (ASRs) to occur after the Closing Date and/or systems integration or potential systems integration and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication;
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative, who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication.

RESPONSE:

None. Please refer to the answers and objections, if any, of CenturyLink to this request, which are incorporated herein by reference.

Respondent: Tracy Strombotne

Oregon
UM 1484
XO Communications Services, Inc., tw
telecom of oregon, llc, Integra Telecom
of Oregon, Inc., Advanced TelCom, Inc.,
Electric Lightwave, LLC, Eschelon
Telecom of Oregon, Inc., Oregon
Telecom, Inc., and United
Telecommunications Inc. d/b/a Unicom,
Covad Communications Company,
PriorityOne Telecom, Inc., & Charter
Fiberlink OR-CCVII, LLC 6-167

INTERVENOR: Joint CLECs

REQUEST NO: 167

Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding processing or potential processing of Local Service Requests (LSRs) to occur after the Closing Date and/or systems integration or potential systems integration and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication;
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication.

RESPONSE:

None. Please refer to the answers and objections, if any, of CenturyLink to this request, which are incorporated herein by reference.

Respondent: Tracy Strombotne

Oregon
UM 1484
XO Communications Services, Inc., tw
telecom of oregon, llc, Integra Telecom
of Oregon, Inc., Advanced TelCom, Inc.,
Electric Lightwave, LLC, Eschelon
Telecom of Oregon, Inc., Oregon
Telecom, Inc., and United
Telecommunications Inc. d/b/a Unicom,
Covad Communications Company,
PriorityOne Telecom, Inc., & Charter
Fiberlink OR-CCVII, LLC 6-168

INTERVENOR: Joint CLECs

REQUEST NO: 168

Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau (e.g., Neustar, Telcordia, Accenture) with which you have had any communications regarding data mapping, data conversion, or other systems/integration efforts to occur or be completed after the Closing Date and, for each such communication:

- a. State the date of each such communication and describe the substance of each communication;
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication.
- c. Provide all documents, including but not limited to any emails, plans, contracts, roadmaps, and/or development documents, that evidence, refer, or relate to such communication.

RESPONSE:

None. Please refer to the answers and objections, if any, of CenturyLink to this request, which are incorporated herein by reference.

Respondent: Tracy Strombotne

Oregon
UM 1484
XO Communications Services, Inc., tw
telecom of oregon, llc, Integra Telecom
of Oregon, Inc., Advanced TelCom, Inc.,
Electric Lightwave, LLC, Eschelon
Telecom of Oregon, Inc., Oregon
Telecom, Inc., and United
Telecommunications Inc. d/b/a Unicom,
Covad Communications Company,
PriorityOne Telecom, Inc., & Charter
Fiberlink OR-CCVII, LLC 6-169

INTERVENOR: Joint CLECs

REQUEST NO: 169

Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e-bonding with CenturyLink, or with the Merged Company after integration of systems with Qwest, relating to the processing or potential processing of ASRs? If your answer is in the affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication, and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);
- b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication; and
- c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Oregon
UM 1484
XO Communications Services, Inc., tw
telecom of oregon, llc, Integra Telecom
of Oregon, Inc., Advanced TelCom, Inc.,
Electric Lightwave, LLC, Eschelon
Telecom of Oregon, Inc., Oregon
Telecom, Inc., and United
Telecommunications Inc. d/b/a Unicom,
Covad Communications Company,
PriorityOne Telecom, Inc., & Charter
Fiberlink OR-CCVII, LLC 6-170

INTERVENOR: Joint CLECs

REQUEST NO: 170

Has any vendor or gateway provider (e.g., DSET or Synchronoss) indicated that it has customers who want to have an application-to-application interface or e-bonding with CenturyLink, or with the Merged Company after integration of systems with Qwest, relating to the processing or potential processing of LSRs? If your answer is in the affirmative (yes):

a. Identify each vendor or gateway provider with whom you have had such communications, state the date of each such communication(s), and describe the substance of each communication (including your response and any projected timeline as to when any such interface is or may be available);

b. Identify each participant in the communication, including each CenturyLink and Qwest employee, agent, or representative who participated in such communication.

c. Provide all documents, including but not limited to any emails, that evidence, refer, or relate to such communication.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Oregon
UM 1484
XO Communications Services, Inc., tw
telecom of oregon, llc, Integra Telecom
of Oregon, Inc., Advanced TelCom, Inc.,
Electric Lightwave, LLC, Eschelon
Telecom of Oregon, Inc., Oregon
Telecom, Inc., and United
Telecommunications Inc. d/b/a Unicom,
Covad Communications Company,
PriorityOne Telecom, Inc., & Charter
Fiberlink OR-CCVII, LLC 6-171

INTERVENOR: Joint CLECs

REQUEST NO: 171

Please indicate whether, after the systems of the Merged Company have been consolidated, the Merged Company will support a Unified Ordering Model (UOM) interface for ASRs.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Oregon
UM 1484
XO Communications Services, Inc., tw
telecom of oregon, llc, Integra Telecom
of Oregon, Inc., Advanced TelCom, Inc.,
Electric Lightwave, LLC, Eschelon
Telecom of Oregon, Inc., Oregon
Telecom, Inc., and United
Telecommunications Inc. d/b/a Unicom,
Covad Communications Company,
PriorityOne Telecom, Inc., & Charter
Fiberlink OR-CCVII, LLC 6-172

INTERVENOR: Joint CLECs

REQUEST NO: 172

Please indicate whether, after the systems of the Merged Company have been consolidated, the Merged Company will support a UOM interface for LSRs.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

