

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.

SUPPLEMENTAL TESTIMONY OF

TIMOTHY J GATES

ON BEHALF OF

tw telecom of oregon, llc, COVAD COMMUNICATIONS COMPANY, LEVEL 3
COMMUNICATIONS, LLC, AND CHARTER FIBERLINK OR-CCVII, LLC

PUBLIC VERSION

**CONFIDENTIAL AND HIGHLY CONFIDENTIAL DATA
HAS BEEN REDACTED**

November 12, 2010

1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Timothy J Gates. My business address is QSI Consulting, 10451
4 Gooseberry Court, Trinity, Florida 34655.

5 **Q. ARE YOU THE SAME TIMOTHY GATES WHO FILED DIRECT**
6 **TESTIMONY IN THIS PROCEEDING ON AUGUST 24, 2010?**

7 A. Yes.

8 **Q. ON WHOSE BEHALF ARE YOU FILING THIS SUPPLEMENTAL**
9 **TESTIMONY?**

10 A. My testimony is being filed on behalf of a number of competitive local exchange
11 carriers (“CLECs”): tw telecom of oregon, llc, Covad Communications Company,
12 Level 3 Communications, LLC, and Charter Fiberlink OR-CCVII, LLC (referred
13 to in my testimony collectively as “Joint CLECs”).

14 **Q. PLEASE EXPLAIN THE PURPOSE OF YOUR TESTIMONY.**

15 A. The purpose of this testimony is to address the Hart-Scott-Rodino (“HSR”)
16 documents that were provided by Qwest and CenturyLink after my direct
17 testimony was filed on August 24, 2010. The Administrative Law Judge (“ALJ”)
18 issued a Ruling on October 15, 2010, allowing for Staff and Intervenor
19 supplemental testimony on HSR documents by November 12, 2010. On
20 November 4, 2010, the ALJ issued a clarifying Ruling indicating that Staff and

1 [REDACTED]

2 [REDACTED]

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9 [REDACTED] END HIGHLY
10 CONFIDENTIAL***]

11 Q. PLEASE DESCRIBE THE [***BEGIN HIGHLY CONFIDENTIAL [REDACTED]

12 [REDACTED]

13 A. [REDACTED]

14 [REDACTED]

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19 [REDACTED] END HIGHLY
20 CONFIDENTIAL***]

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A. Headcount

1. Local Operating Model

Q. PLEASE EXPLAIN HOW [*BEGIN HIGHLY CONFIDENTIAL**

[REDACTED]

A.

[REDACTED] **END HIGHLY**

CONFIDENTIAL*]** CenturyLink will do this by implementing the Go-To-Market model in Qwest’s region post-merger.² I discussed in my direct testimony (pages 65-68) how implementation of CenturyLink’s local operating model in Qwest’s region poses risk of harm to the public interest. Though CenturyLink failed to provide any useful details about how it would implement its local operating model into Qwest’s region if the proposed transaction is approved despite being specifically asked for such information (Joint CLECs/8, Gates/67-68), information regarding the CenturyLink merger with Embarq suggests that this has had negative consequences following the Embarq transaction. For example, Lincoln City, Oregon has explained that: “[i]n the name of post-merger cost savings, CenturyTel has enlarged its management districts with fewer managers overall, and fewer, local knowledgeable technicians...”³ and “[i]f the

² CTL/200, Schafer/12-13.

³ Petition to Intervene by City of Lincoln City, Oregon PUC Docket UM 1484, July 30, 2010 (“City Petition”), at p. 4. The City states: “City can prove, if necessary, that the experienced former Embarq technicians and managers who were knowledgeable about the switches and related equipment

1 pattern following the Embarq/CenturyTel merger continues with the
2 CenturyTel/Qwest merger, fewer and fewer managers and technicians will be
3 responsible for more and more territory.”⁴ A loss of knowledgeable technicians is
4 especially risky in relation to this transaction because it involves a *non*-Bell
5 Operating Company (“BOC”) incumbent local exchange carrier (“ILEC”) that has
6 primarily operated in small, rural exchanges (CenturyLink), acquiring a BOC that
7 has large, urban exchanges who, therefore, operates under additional regulatory
8 obligations (Qwest). Since CenturyLink has no experience operating in the urban
9 exchanges in which Qwest currently operates, or under the BOC obligations that
10 apply to Qwest, there is no evidence that CenturyLink can or will realign its work
11 force in a way – or in numbers – that would maintain Qwest’s current wholesale
12 service quality metrics and compliance with its regulatory obligations.⁵

13 **2. Systems Integration**

14 **Q. THE SECOND ELEMENT OF CENTURYLINK’S [***BEGIN HIGHLY**
15 **CONFIDENTIAL [REDACTED]**
16 **[REDACTED] END HIGHLY CONFIDENTIAL***] IS**
17 **THERE REASON TO BELIEVE THAT CENTURYLINK WILL**

controlling north Lincoln County and Tillamook County were systematically fired or retired by CenturyTel making the performance of its promises ever more speculative and unlikely.”

⁴ City Petition at p. 4.

⁵ See, e.g., Joint CLECs/9, Gates/66.

1 [unified ordering model⁷] UOM interface for LSRs.”⁸ Qwest has indicated that its
2 OSS interface “IMA is *not* UOM compliant[,]”⁹ but CenturyLink has indicated
3 that its OSS interface EASE *is* UOM compliant.¹⁰ Reading these statements
4 together, this information indicates that the interface Qwest currently uses to
5 process CLEC LSRs (Interconnect Mediated Access or “IMA”) will no longer be
6 available in its present form. CenturyLink will either replace it or modify it,
7 contrary to the recommendation of the Joint CLECs.¹¹ Furthermore, reading
8 between the lines of CenturyLink’s claims that (a) its OSS is UOM compliant and
9 (b) that no “new” OSS will be involved in the proposed transaction,¹² the only
10 logical conclusion is that CenturyLink will attempt to convert Qwest’s OSS to
11 CenturyLink’s OSS post-merger.

12 **Q. IF CENTURYLINK INTEGRATED ITS OSS INTO QWEST’S REGION**
13 **POST-MERGER, WOULD CLECS EXPERIENCE A LOSS IN**
14 **FUNCTIONALITY AND/OR EFFICIENCY?**

⁷ Unified Ordering Model (“UOM”) Guidelines Document, established by the Ordering and Billing Forum (“OBF”), are described as follows: “The Unified Ordering Model (UOM) describes a complete set of system documentation using an end-to-end structured methodology. The scope of UOM encompasses business requirements, analysis, design and implementation.” <http://www.atis.org/obf/UOMASRsumm.asp>

⁸ CenturyLink Response to Joint CLECs Oregon Data Request 172. Joint CLECs asked CenturyLink: “Please indicate whether, after all of the systems of the Merged Company have been consolidated, the Merged Company will support a UOM interface for LSRs.”

⁹ Qwest Response to Joint CLECs Data Request 174. Joint CLECs asked Qwest: “Is the interface that Qwest currently uses to process LSRs for CLECs a UOM interface. (emphasis added)

¹⁰ “I mean, our system is also UOM compliant, universal ordering module compliant, now.” Minnesota Docket P-421 et al./PA-10-456, Hearing Transcript Volume 2B (public) at p. 149 (Hunsucker).

¹¹ See, e.g., Joint CLECs/8, Gates/128, lines 7-12.

¹² CTL/500, Jones/19, lines 3-4 (“The proposed Transaction does not include the risk associated with creating new OSS or a ‘flash cut’ to a different OSS on the day the merger is completed.”)

1 A. Yes. I discussed in my direct testimony differences in functionality between
2 Qwest's and CenturyLink's OSS.¹³ I have also attached to my testimony as Joint
3 CLECs/20 a matrix that compares the functionality of CenturyLink and Qwest
4 OSS for handling Local Service Requests ("LSRs"). This exhibit, which is based
5 on the discovery responses provided by CenturyLink and Qwest (attached as Joint
6 CLECs/21), shows that there are numerous functionalities and order types related
7 to LSRs that are available from Qwest's OSS that are not available from
8 CenturyLink's OSS. Some of these examples include, for the pre-order functions,
9 Raw Loop Data Validation and Loop Qualification (for ISDN, ADSL, and
10 commercial broadband services). Each of these has a "no" in the CenturyLink
11 EASE column for which there is a "yes" in the Qwest IMA column in Joint
12 CLECs/20. This is an important difference between EASE, which does not have
13 this pre-order functionality, and Qwest's IMA, which does. Qwest's Raw Loop
14 Data and Loop Qualification pre-order tool helps CLECs to determine the
15 likelihood of being able to provide an end user with xDSL service *before the*
16 *CLEC* places an order for the customer. This process allows a CLEC to review
17 loop make-up information when trying to determine what service may best meet
18 the customer's needs before the LSR process even starts. The key difference is
19 that, with Qwest IMA, the CLEC has *access* to the information *before* ordering
20 (*i.e., pre-order*). With EASE, the CLEC has to *submit an order* to *obtain* the
21 information. This delays delivery of service to the customer and requires a CLEC

¹³ Joint CLECs/8, Gates/58-60.

1 to submit an additional LSR (one LSR for the “pre-qualification” and another for
2 the circuit) for a single customer request. The process for CenturyLink EASE¹⁴
3 requires a CLEC to first submit an LSR to determine if the loop qualifies and
4 whether it requires conditioning. This is one example of a significant difference
5 in the functionality between IMA and EASE regarding loop qualification. The
6 difference translates to a delay in delivery of service to the customer because the
7 CLEC must submit two orders (LSRs), with a 2-day interval after the first order
8 before the second order can be submitted.

9 **Q. ARE THERE OTHER CRITICAL FUNCTIONS THAT ARE AVAILABLE**
10 **FROM QWEST’S OSS THAT ARE NOT AVAILABLE FROM**
11 **CENTURYLINK’S OSS?**

12 A. Yes. In addition to loop qualification, the inability to validate Channel Facility
13 Assignments (“CFAs”) and Network Channel (“NC”)/Network Channel Interface
14 (“NCI”) codes before placing an order are both examples of this. Both of these
15 pre-order functions were identified by CenturyLink as not available when
16 ordering via an LSR from CenturyLink in discovery responses.¹⁵ Both of these
17 pre-order functions are available when ordering via an LSR from Qwest.¹⁶ Both

¹⁴ See the EASE VFO Local Service Requests Order Entry Job aide at:
http://ease.centurylink.com/Document/CLEC_Prequel_Training_job_aid.doc

¹⁵ Joint CLECs/20 and Joint CLECs/21.

¹⁶ <http://www.qwest.com/wholesale/clecs/preordering.html>

1 are important aspects of the “pre-ordering”¹⁷ phase of OSS. A CFA¹⁸ is,
2 generally speaking, an address (defined by a number or code) that identifies for
3 carriers a specific point of access or connection to the network.¹⁹ Before a CLEC
4 places an order, the CLEC needs to validate whether a CFA is available or in use.
5 If it is available, a CLEC may submit an order using that CFA. If it is in use (*i.e.*,
6 unavailable), the CLEC needs to request a different CFA when placing an order.
7 If a CLEC cannot validate the CFA in advance, it must first submit an order and
8 find out only *after* placing the order (and paying any fees associated with that
9 order and waiting for any interval associated with this process) whether the CFA
10 is in use. If the CFA is in use, a delay results because the CLEC must then re-
11 submit an LSR using a different CFA to find out if that CFA is available. In the
12 aggregate, this is both inefficient and costly for competitors.

¹⁷ The FCC defines OSS to include five functions: (1) pre-ordering, (2) ordering, (3) provisioning, (4) maintenance and repair, and (5) billing. *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*; First Report and Order, CC Docket No. 96-98, FCC 96-325, Released August 8, 1996 (“*Local Competition Order*”) at ¶¶516-528. See also, *In the Matter of Application by Qwest Communications International, Inc. for Authorization To Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington, and Wyoming*, Memorandum Opinion and Order, WC Docket No. 02-314, FCC 02-332, Released December 23, 2002 (“*Qwest 9 State 271 Order*”), at ¶¶ 33-34 & footnote 83 to ¶34, which states: “*Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd 3953, 3989 at ¶ 82 (1999) (*Bell Atlantic New York Order*), *aff’d*, *AT&T Corp. v. FCC*, 220 F.3d 607 (D.C. Cir. 2000). **The Commission [FCC] has defined OSS as the various systems, databases, and personnel used by incumbent LECs to provide service to their customers.** See *Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas*, Memorandum Opinion and Order, 15 FCC Rcd 18354, 18396-97, ¶ 92 (2000) (*SWBT Texas Order*)” (emphasis added). See also, 47 C.F.R. §51.313(c) and §51.319(g).

¹⁸ A CFA is sometimes referred to as a “channel,” “connecting,” or “circuit” facility assignment.

¹⁹ “Connecting Facility Assignment allows a CLEC to query for and obtain a list of valid and available CFAs and channel assignment records.” See:
http://www.qwest.com/disclosures/netdisclosure409/26/Chapter05_.pdf

1 Similarly, a CLEC needs the ability to validate NC/NCI code combinations.
2 Industry standard codes, known as NC and NCI codes, are used in ordering to
3 distinguish among products. An ILEC, such as Qwest, may accept LSRs for only
4 certain combinations of NC and NCI codes. The NC/NCI code pre-order function
5 allows a CLEC to validate that a particular NC/NCI code combination will be
6 accepted by the ILEC for ordering the desired service. Without this validation
7 capability, errors may result such as delivery of the wrong service, and delays
8 may result such as when the ILEC later rejects an NC/NCI code combination as
9 invalid.

10 Pre-ordering functionality, such as CFA and NC/NCI code validation, is
11 important. In reviewing Qwest's compliance with its 271 obligations, the FCC
12 said:

13 [P]re-ordering includes gathering and verifying the information
14 necessary to place a new service order. Given that pre-ordering
15 represents the first exposure that a prospective customer has to a
16 competing carrier, inferior access to the incumbent's OSS may
17 render the competing carrier less efficient or responsive than the
18 incumbent. ***The applicable standard is whether the BOC provides***
19 ***access to its OSS that allows competitors to perform pre-ordering***
20 ***functions in substantially the same time and manner as the***
21 ***BOC's retail operations. For those pre-order functions that lack***
22 ***a retail analogue, the BOC must provide access that affords an***
23 ***efficient competitor a meaningful opportunity to compete.***²⁰

²⁰ Qwest 9-State 271 Order at ¶38 (footnotes omitted, emphasis added).

1 **Q. DOES THE COMPARISON SHOWN IN THE MATRIX IN JOINT**
2 **CLECS/20 REVEAL ADDITIONAL LIMITATIONS OF THE**
3 **CENTURYLINK OSS?**

4 A. Yes. CLECs have asked CenturyLink which of a list of 38 different Qwest order
5 types (products) CenturyLink currently provides with EASE. Of the 38 Qwest
6 order types identified, CenturyLink responded YES to fifteen (15), and NO²¹ to
7 fifteen (15). CenturyLink’s response to eight (8) was: “CenturyLink is unclear
8 what service or product is being described in this question.”²² This response
9 suggests that CenturyLink does not offer the order type (product) as it does not
10 even recognize the name of the order type (product). Even if the three interim
11 number portability order types are removed, and one assumes that the answer is
12 yes for the eight about which CenturyLink is unclear, there are twelve types of
13 services for which a CLEC cannot use EASE to submit a LSR. Those twelve
14 order types, as shown in Joint CLECs/20, are: (1) Resale Frame Relay; (2)
15 Unbundled Analog Line Side Switch Port; (3) Unbundled Analog Line Side
16 Switch Port ISDN BRI Capable; (4) Unbundled Analog DID/PBX Trunk Port; (5)
17 Unbundled DS1 DID/PBX Trunk or Trunk Port Facility; (6) UNEP ISDN BRI;
18 (7) UNE-P PRI ISDN Facility; (8) UNE-P PRI ISDN Trunk; (9) Line Split UNEP
19 POTS; (10) Line Spilt UNEP PBX Design Trunk; (11) Split UNEP Centrex 21
20 and (12) Unbundled Loop Split. The twelve order types listed above are only a

²¹ For twelve of the responses CenturyLink said it did not offer the product or service and three related to Interim Number Portability which CenturyLink said it did not allow.

²² Joint CLECs/20, middle column entitled CenturyLink.

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conservative estimate of the number of order types (products) that are not supported by EASE, the actual number may be higher.

Q. HAVE YOU REVIEWED OTHER INFORMATION THAT SUPPORTS YOUR CONCERNS ABOUT CENTURYLINK INTEGRATING ITS LEGACY SYSTEMS WITH LESS FUNCTIONALITY INTO QWEST'S REGION POST-MERGER?

A. *****BEGIN HIGHLY CONFIDENTIAL** [REDACTED]

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3. Consolidation and Elimination of Duplicative Work
Functions

Q. PLEASE EXPLAIN HOW ***BEGIN HIGHLY CONFIDENTIAL [REDACTED]

[REDACTED]

[REDACTED] END HIGHLY
CONFIDENTIAL*** POSES SEVERE RISK OF HARM TO
COMPETITION AND THE PUBLIC INTEREST.

A. [***BEGIN HIGHLY CONFIDENTIAL [REDACTED]

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2 [REDACTED] **END HIGHLY**

3 **CONFIDENTIAL***]** This is in addition to the [*****BEGIN**

4 **CONFIDENTIAL** [REDACTED]

5 [REDACTED]

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8 [REDACTED] **END**

9 **CONFIDENTIAL***]** This is also in addition to [*****BEGIN HIGHLY**

10 **CONFIDENTIAL** [REDACTED]

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CONFIDENTIAL***]

4. CLECs Face Significant Uncertainty During Post-Merger Integration

Q. HAVE YOU REVIEWED ANY INFORMATION TO SUGGEST THAT CENTURLINK HAS ANALYZED HOW [***BEGIN HIGHLY CONFIDENTIAL [REDACTED] END HIGHLY CONFIDENTIAL***] MAY IMPACT WHOLESALE CUSTOMERS?

A. [***BEGIN HIGHLY CONFIDENTIAL [REDACTED]
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[REDACTED] **END HIGHLY
CONFIDENTIAL***]** Since legacy CenturyLink is not subject to self-
executing performance assurance plans like Qwest's QPAP and Qwest has
already moved to eliminate PAPs in some states, this reference to [*****BEGIN
HIGHLY CONFIDENTIAL** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] **END HIGHLY
CONFIDENTIAL***]**

Q. DO YOU HAVE OTHER CONCERNS?

A. Yes. [*****BEGIN HIGHLY CONFIDENTIAL** [REDACTED]
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9 [REDACTED] **END HIGHLY CONFIDENTIAL***]** Specifically, the Merged
10 Company is likely to adopt: CenturyLink’s worst practices of assessing
11 anticompetitive wholesale charges,²³ refusing to establish a single point of
12 interconnection per LATA,²⁴ and refusing to provide adequate directory terms.²⁵
13 This will almost certainly lead to future disputes and increased costs for CLECs
14 as they will have to expend significant resources to engage in the time-consuming
15 process of negotiating or arbitrating previously settled issues in an effort to obtain
16 reasonable rates, terms and conditions in their new interconnection agreements.
17 Because the merged company will be larger in size (covering 37 states) and scope
18 (serving more than 17 million access lines with \$17 billion in revenue), it will
19 have a strong incentive to use its market power as leverage during these
20 interconnection agreement negotiations. Resisting that additional leverage and

²³ Joint CLECs/8, Gates/68-73 and Joint CLECs/8, Gates/171-179.
²⁴ Joint CLECs/8, Gates/188-193.
²⁵ Joint CLECs/8, Gates/166-171.

1 market power will undoubtedly raise CLECs' transaction costs, as each new
2 interconnection agreement must be negotiated, and sometimes arbitrated, in order
3 to obtain fair and reasonable terms. Of course, this result can be avoided if the
4 Commission adopts Joint CLECs' proposed condition that requires the post-
5 merger company to extend the term of current interconnection agreements for at
6 least three years from the merger closing date so that CLECs would not have to
7 engage in the time consuming and expensive process of negotiating
8 interconnection agreements with the Merged Company as it works through the
9 integration process. (See Joint CLEC proposed Condition No. 8; Joint CLECs/16,
10 Gates/5).

11 **[***BEGIN HIGHLY CONFIDENTIAL** [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED] **END**

15 **HIGHLY CONFIDENTIAL***]**

16 **Q. IS CENTURYLINK EXPECTING TO BENEFIT FROM EFFICIENCIES**
17 **ACHIEVED DUE TO POST-MERGER INTEGRATION?**

18 A. Yes. CenturyLink has said: "CenturyLink and Qwest believe that there are
19 numerous important benefits flowing from the proposed transaction,
20 including...[i]mproved operating and capital efficiency through reductions in

1 corporate overhead and the elimination of duplicative functions and systems.”²⁶

2 CenturyLink has said that the efficiencies and economies that it expects to achieve
3 from the proposed transaction will “result in lower overhead costs per customer,
4 or per access line” and “decreased per unit cost for a given service...”²⁷

5 **Q. IS IT FAIR TO ASSUME THAT THESE EFFICIENCIES AND LOWER**
6 **COSTS, IF ACHIEVED, WILL TRANSLATE TO BENEFITS FOR**
7 **CLECS, SUCH AS LOWER COST-BASED WHOLESALE RATES?**

8 A. No. In discovery request JC-59, the Joint CLECs quoted CenturyLink’s claims
9 about cost reductions and savings due to operational synergies and asked
10 CenturyLink whether it “expect[s] to seek reductions in cost-based rates for
11 interconnection/UNEs/collocation in Qwest’s legacy service areas post-merger
12 due to these cost reductions[.]” CenturyLink responded, in part, that it “has not
13 evaluated or reached any conclusions concerning this issue at this time.”²⁸
14 CenturyLink’s discovery response and CenturyLink’s rejection of Joint CLECs’
15 Condition 7 and subparts that would provide rate stability for wholesale services
16 during the integration process shows that CenturyLink wants to reserve for itself
17 the ability to *raise* wholesale rates charged to competitors while it strives to
18 achieve greater efficiencies and lower costs for itself. [*****BEGIN HIGHLY**

19 **CONFIDENTIAL** [REDACTED]

²⁶ CTL/300, Bailey/12-13.

²⁷ CenturyLink Response to Colorado Office of Consumer Counsel Data Request #1-15(a) and (b).

²⁸ CenturyLink response to Joint CLEC data request JC-59 (sponsor: Ken Buchanan, Manager Regulatory Finance).

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[REDACTED] **END HIGHLY**

CONFIDENTIAL*]**

1 Q. CENTURLINK TESTIFIES THAT IT “VALUE[S]” CLECS²⁹ AND IS
2 COMMITTED TO QUALITY WHOLESALE SERVICES.³⁰ DID YOU SEE
3 ANYTHING IN THE HSR DOCUMENTS THAT SUPPORTS
4 CENTURLINK’S CLAIMS?

5 A. [***BEGIN HIGHLY CONFIDENTIAL [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] END
17 HIGHLY CONFIDENTIAL***]

18 Q. PLEASE EXPLAIN.
19 A. First, cable companies deploying interconnected VoIP services have been
20 successful at competing with CenturyLink’s traditional business by providing

²⁹ CTL/800, Hunsucker/6, Hunsucker/14, Hunsucker/25.
³⁰ CTL/800, Hunsucker/5-6.

1 competitive voice service in residential markets. Charter, in particular, operates
2 in many of CenturyLink's service areas and therefore competes directly with
3 CenturyLink for voice service customers. Second, cable companies generally
4 offer high-speed Internet connections in competition with CenturyLink's and
5 Qwest's DSL and/or Internet services. Third, CenturyLink is expanding its IPTV
6 (Internet Protocol Television) services which compete directly with traditional
7 cable television service. Thus, CenturyLink has significant economic incentives
8 to undermine the cable companies' ability to compete with CenturyLink by
9 degrading wholesale services provided to the cable companies' CLEC affiliates.

10 **[***BEGIN HIGHLY CONFIDENTIAL** [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED] **END**

14 **HIGHLY CONFIDENTIAL***]**

15 If CenturyLink truly valued its CLEC wholesale customers, it would be more
16 receptive to the CLECs' concerns about the proposed transaction and their
17 proposed conditions. Instead, Joint Applicants have dismissed the CLECs'
18 concerns as "noise"³¹ and rejected most of the conditions proposed by Joint
19 CLECs. In other industries with competitive markets, that type of attitude would
20 likely lead to failure (as customers would leave that service provider for other

³¹ Rebuttal Testimony of Robert Brigham, Docket UM 1484, September 21, 2010, at p. 28, line 11.

1 A. [***BEGIN HIGHLY CONFIDENTIAL [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED] END HIGHLY
6 CONFIDENTIAL***]

7 Q. PLEASE BRIEFLY DESCRIBE THE PROBLEMS CENTURYLINK HAS
8 EXPERIENCED DURING ITS INTEGRATION OF EMBARQ.

9 A. Since I filed my direct testimony in this docket, the Communications Workers of
10 America (“CWA”) filed testimony in other state commission proceedings
11 reviewing the proposed transaction, including Minnesota and Arizona, describing
12 problems encountered by CenturyLink during its integration of Embarq in North
13 Carolina and Ohio. CenturyLink filed testimony in response to CWA’s testimony
14 acknowledging these problems. Some of the problems CWA describes include:

- 15 • “workers...being dispatched to incorrect locations for service”³²
- 16 • “workers reported being dispatched for service with insufficient or
17 incorrect information”³³
- 18 • longer out of service periods and longer delays in initiating service³⁴
- 19 • differing and confusing software that dispatches/assigns technicians³⁵

³² Pre-Filed Direct Testimony of Jasper Gurganus on behalf of Communications Workers of America (“CWA”), Arizona Docket Nos. T-01051B-10-0194, September 27, 2010 (“Gurganus Arizona Direct Testimony”) at p. 5, lines 3-4. Available at: <http://images.edocket.azcc.gov/docketpdf/0000118396.pdf>

³³ Gurganus Arizona Direct Testimony at p. 5, lines 13-14.

³⁴ Gurganus Arizona Direct Testimony at p. 5, lines 7-10.

³⁵ Gurganus Arizona Direct Testimony at pp. 5-6.

- 1 • “the systems do not appear to be interconnected or coordinated”³⁶
- 2 • negative impacts on work flow³⁷
- 3 • “inefficiencies in the new systems”³⁸
- 4 • “insufficient training and resources”³⁹ and
- 5 • consumer frustration about installation and service appointments not being
- 6 met and long hold times.⁴⁰

7 As recently as October 1, 2010, CWA reported that “our North Carolina techs
8 report that nothing has really improved”⁴¹ and that: problems are still occurring
9 regarding “missing or incomplete information on orders[,]” “techs in North
10 Carolina are struggling to complete orders on time[,]” and “employees are still
11 working overtime trying to complete tasks.”⁴² Regarding the problems in Ohio,
12 CWA said:

13 The Leaders in Ohio, where Embarq systems were converted to
14 CenturyLink systems beginning in October of 2009, responded that
15 they still were not back to the level of efficiency they had before
16 the cutover. That is to say, even after a year, they are still
17 experiencing so-called transition problems. In particular, they
18 report continued problems with missing or incomplete order
19 information so that they must ask the customers what they ordered

³⁶ Gurganus Arizona Direct Testimony at p. 6, lines 16-17.

³⁷ Gurganus Arizona Direct Testimony at pp. 7-8.

³⁸ Gurganus Arizona Direct Testimony at p. 8, line 8. *See also*, Gurganus Arizona Direct Testimony at p. 9 (“I also received a report that the new CenturyLink systems are so inefficient (improper orders, bad tickets, delays from being on hold while calling in for information that should have been included on the work orders) that tasks that should take a tech one hour to complete are taking as long as three hours...some of the new systems require a lot of manual override.”)

³⁹ Gurganus Arizona Direct Testimony at p. 4, line 14.

⁴⁰ Gurganus Arizona Direct Testimony at p. 10.

⁴¹ Pre-Filed Surrebuttal Testimony of Jasper Gurganus on behalf of the Communications Workers of America (CWA), Minnesota Docket No. P-421, et al./PA-10-456, October 1, 2010 (“Gurganus Minnesota Surrebuttal Testimony”), at p. 2, lines 5-17. Available at: <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={DC87A4D2-0C00-417A-8A4E-01B408BE6CE9}&documentTitle=201010-55078-01>

⁴² Gurganus Minnesota Surrebuttal Testimony at p. 3, lines 6-10.

1 and hope that they have the necessary equipment on hand to
2 complete the order.

3 One tech in Ohio described arriving at an attorney's office this
4 week with an incomplete order. When the tech asked the customer
5 what services and equipment they wanted, the customer berated
6 him, saying he spent three hours on the phone trying to place the
7 order and he wasn't going to spend anymore time repeating
8 himself.⁴³

9 CenturyLink has identified several causes of these problems, including outside
10 plant records and "devices" being loaded incorrectly,⁴⁴ "differences between the
11 old and new systems"⁴⁵ and a "lack of familiarity with the new systems..."⁴⁶

12 **Q. HAS CENTURYLINK ADMITTED THAT THESE PROBLEMS HAVE**
13 **LED TO SERVICE QUALITY DETERIORATION?**

14 A. Yes. CenturyLink states that these problems have "caused CenturyLink to
15 produce lower service level metrics than desired since conversion."⁴⁷ In fact,
16 according to a service quality report from the North Carolina Utilities
17 Commission, CenturyLink has failed to meet the service quality standards for at
18 least Business Office Answer Time, Repair Service Answer Time and Out-of-

⁴³ Pre-Filed Surrebuttal Testimony of Jasper Gurganus on behalf of the Communications Workers of America (CWA), Minnesota Docket No. P-421, et al./PA-10-456, October 1, 2010 ("Gurganus Minnesota Surrebuttal Testimony"), at p. 2, lines 5-17. Available at:

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPop&documentId={DC87A4D2-0C00-417A-8A4E-01B408BE6CE9}&documentTitle=201010-55078-01>

⁴⁴ Rebuttal Testimony of Duane Ring on behalf of CenturyLink, Minnesota Docket No. P-421, et al./PA-10-456, September 13, 2010 ("Ring Minnesota Rebuttal Testimony") at p.2. Available at:

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPop&documentId={A48DAA86-7AD1-4E97-84AB-69E1D1DEACCE}&documentTitle=20109-54401-01>

⁴⁵ Ring Minnesota Rebuttal Testimony at p. 2, lines 21-22.

⁴⁶ Ring Minnesota Rebuttal Testimony at p. 3, lines 5-6. See *also*, CenturyLink Second Supplemental Response (dated 10/28/10) describing some of these problems.

⁴⁷ Ring Minnesota Rebuttal Testimony at p. 5, lines 16-18.

1 Service Troubles Cleared within 24 hours.⁴⁸ CenturyLink was asked about the
2 service quality deterioration in North Carolina under cross-examination at the
3 hearing in the Minnesota merger review proceeding:

4 Q. First, in your opening remarks you mentioned the situation
5 in North Carolina, you did not mention your compliance
6 with the service quality standards of the North Carolina
7 Utilities Commission, are you familiar with that?

8 A. I am not directly familiar with those.

9 Q. All right. Would you accept that there are service quality
10 standards in that state for telephone service?

11 A. I would assume there are.

12 Q. And I'm looking here at a service quality report that's
13 available on that commission's website covering the period
14 July 1, 2009 through June 30, 2010. And would you accept
15 that it shows that your operating companies in North
16 Carolina are out of compliance with the business office
17 answer time standard?

18 A. If that's what it says.

19 Q. And also that they're out of compliance with the repair
20 service answer time standard?

21 A. If that's what it says.

22 Q. And also with the out-of-service troubles cleared within 24
23 hours, would you accept that also?

24 A. If that's what it says.

25 Q. All right. And just to be clear, your operating companies in
26 that state are Carolina Telephone and Telegraph and also
27 Central Telephone Company, correct?

28 A. Correct.

29 Q. Now, let's try to put the North Carolina conversion into a
30 little perspective. You serve just under a million access
31 lines in North Carolina, don't you?

⁴⁸ North Carolina Utilities Commission Service Quality Report, for period July 1, 2009 through June 30, 2010. Available at:

<http://www.ncuc.commerce.state.nc.us/consumer/svcqlty.pdf>

1 A. It's right around a million.⁴⁹

2 It is clear that the problems encountered by CenturyLink when integrating
3 Embarq have resulted in service quality deterioration that has had widespread
4 negative impacts customers in North Carolina.

5 **Q. HOW DO THESE PROBLEMS RELATE TO CENTURYLINK'S**
6 **[***BEGIN HIGHLY CONFIDENTIAL [REDACTED] END HIGHLY**
7 **CONFIDENTIAL***]?**

8 A. The problems CenturyLink has encountered in North Carolina when converting
9 Embarq negatively impacted dispatch efficiency and service delivery – e.g.,
10 “workers...being dispatched to incorrect locations for service,”⁵⁰ “workers
11 reported being dispatched for service with insufficient or incorrect information,”⁵¹
12 longer out of service periods and longer delays in initiating service,⁵² differing
13 and confusing software that dispatches/assigns technicians,⁵³ and consumer
14 frustration about installation and service appointments not being met and long
15 hold times.⁵⁴ **[***BEGIN HIGHLY CONFIDENTIAL [REDACTED]**

16 **[REDACTED]**
17 **[REDACTED] END HIGHLY CONFIDENTIAL***]**

⁴⁹ Minnesota Docket No. P-421, et al./PA-10-456, Hearing Transcript, Volume 2A (Public) at pp. 65-66 (Duane Ring).

⁵⁰ Gurganus Arizona Direct Testimony at p. 5, lines 3-4.

⁵¹ Gurganus Arizona Direct Testimony at p. 5, lines 13-14.

⁵² Gurganus Arizona Direct Testimony at p. 5, lines 7-10.

⁵³ Gurganus Arizona Direct Testimony at pp. 5-6.

⁵⁴ Gurganus Arizona Direct Testimony at p. 10.

1 In other words, service quality deteriorated in North Carolina when CenturyLink
2 *****BEGIN HIGHLY CONFIDENTIAL** [REDACTED]
3 **END HIGHLY CONFIDENTIAL*****].

4 **Q. DO THESE PROBLEMS RAISE CONCERNS ABOUT CENTURYLINK'S**
5 *****BEGIN HIGHLY CONFIDENTIAL** [REDACTED] **END HIGHLY**
6 **CONFIDENTIAL***] FOR OTHER REASONS?**

7 **A. Yes. ***BEGIN HIGHLY CONFIDENTIAL** [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] **END HIGHLY CONFIDENTIAL***]** The

17 problems from North Carolina show that:

18 (1) CenturyLink replaced legacy Embarq systems with legacy CenturyTel
19 systems with less functionality *****BEGIN HIGHLY**
20 **CONFIDENTIAL** [REDACTED]
21 [REDACTED]
22 **END HIGHLY CONFIDENTIAL***]**;

23 (2) data about outside plant records were not mapped correctly
24 *****BEGIN HIGHLY CONFIDENTIAL** [REDACTED]

1 [REDACTED] END HIGHLY
2 CONFIDENTIAL***];

3 (3) data was misinterpreted and not loaded correctly [***BEGIN
4 HIGHLY CONFIDENTIAL [REDACTED]
5 [REDACTED] END HIGHLY
6 CONFIDENTIAL ***]; and

7 (4) a deterioration in service quality occurred [***BEGIN HIGHLY
8 CONFIDENTIAL [REDACTED]
9 [REDACTED] END
10 HIGHLY CONFIDENTIAL***]

11 When the integration problems from North Carolina are considered [***BEGIN
12 HIGHLY CONFIDENTIAL [REDACTED]
13 [REDACTED] END HIGHLY CONFIDENTIAL***], it shows that no matter how
14 careful CenturyLink may be in planning [***BEGIN HIGHLY
15 CONFIDENTIAL [REDACTED] END
16 HIGHLY CONFIDENTIAL***], service-impacting problems can and do occur.

17 **Q. DO CENTURYLINK'S [***BEGIN HIGHLY CONFIDENTIAL [REDACTED]**
18 **[REDACTED] END HIGHLY**
19 **CONFIDENTIAL***] POSE RISKS OF MERGER-RELATED HARM,**
20 **AND IF SO, HOW?**

21 A. Yes. As I discussed in my direct testimony (at pages 65-66), CenturyLink has
22 stated that “direct response marketing efforts” is one part of its “Go-to-Market”
23 model, the operating model CenturyLink intends to incorporate into Qwest’s
24 region post-merger. However, when CLECs asked CenturyLink about what was
25 included in these “direct response marketing efforts” to determine whether these

1 new tactics, if/when they are incorporated into Qwest's region, would result in
2 merger-related harm to competition, CenturyLink objected to the question.⁵⁵ I
3 explained that the Joint CLECs' concerns were warranted, particularly in light of
4 the recent examples of inappropriate marketing activity that has occurred between
5 Qwest representatives and CLEC end users customers.⁵⁶ I also discussed
6 CenturyLink's waiver of the one-day porting requirement as an example of
7 merger-related activities taking precedence over maintaining compliance with
8 existing obligations, and explained that conditions (such as Condition 22 and
9 subparts related to complying with number porting obligations) are needed.⁵⁷

10 **[***BEGIN HIGHLY CONFIDENTIAL** [REDACTED]

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

⁵⁵ CenturyLink responses to Joint CLECs information requests JC-133, JC-134 and JC-135.

⁵⁶ Joint CLECs/8, Gates/149-150.

⁵⁷ Joint CLECs/8, Gates/58, 81-82, 160 and footnote 270.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] END HIGHLY CONFIDENTIAL***]

Q. DO YOU HAVE ANY CONCLUDING REMARKS?

A. Yes. [***BEGIN HIGHLY CONFIDENTIAL [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]

9 **END HIGHLY CONFIDENTIAL***]** I continue to recommend that the
10 proposed transaction be rejected, or in the alternative, approved subject to the
11 Joint CLECs' proposed conditions list attached to my direct testimony as Joint
12 CLECs/16.

13 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?**

14 A. Yes, it does.

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 CLECs/20 (Gates)

COMPARISON OF CENTURYLINK AND QWEST LOCAL SERVICE REQUEST OSS FUNCTIONALITY

Functionality/Order Type	CenturyLink ¹		Qwest ²	
	EASE-GUI LSR	EASE-EDI LSR	IMA-GUI LSR	IMA-XML LSR
<i>Pre-Order Functions</i>				
Address validation	YES	YES	YES	YES
Channel Facility Assignment (CFA) Validation	NO	NO	YES	YES
Meet Point Query Validation	NO	NO	YES	YES
Network Channel (NC)/Network Channel Interface (NCI) Codes Validation	NO	NO	YES	NO
Raw Loop Data Validation (at least for pre-order functions, services and products that Qwest currently provides)	NO	NO	YES	YES
Billing Account Number (BAN) Validation	YES	YES	YES ³	NO
Customer Service Records (CSR)	YES	YES	YES	YES
Telephone Number(s) (TNs) Reservation	NO	NO	YES	YES
Provide Facility Availability	NO	NO	YES	YES
Provide Service Availability	NO	NO	YES	YES
Loop Qualification for Integrated Services Digital Network (ISDN)	NO	NO	YES	YES
Loop Qualification for Unbundled Asymmetric Digital Subscriber Line (ADSL)	NO	NO	YES	YES
Loop Qualification for Commercial Broadband Services	NO	NO	YES	YES
Appointment Scheduling	NO	NO	YES	YES
<i>Pre-Populate LSR</i>				
Does the system currently pre-populate information in the LSR?	NO	NO	YES	N/A ⁴
<i>Order Types performed</i>				
a. Unbundled Loop	YES	YES	YES	YES
b. Unbundled Feeder Loop	Unknown ⁵	Unknown	YES	YES

¹ The CenturyLink column is populated based on CenturyLink's responses to CLEC data requests. See Joint CLECs/21.

² The Qwest column is populated based on information obtained on Qwest's external website. See <http://www.qwest.com/wholesale/>.

³ IMA-GUI offers a list of Billing Account Numbers (BANs) for each corporate identifier (known as RSID/ZCID). See IMA User Guide, p. 178 at http://www.qwest.com/wholesale/downloads/2010/100802/IMAUG_280_080210.pdf

⁴ Pre-population of the LSR is a GUI issue, not present in an application-to-application environment (EDI or XML).

⁵ CenturyLink's response for any service populated with Unknown is: "CenturyLink is unclear what service or product is being described in this question."

c. Unbundled Distribution Loop	Unknown	Unknown	YES	YES
d. Local Number Portability	YES	YES	YES	YES
e. Loop with Number Port	YES	YES	YES	YES
f. Unbundled Distribution Loop with Number Portability	Unknown	Unknown	YES	YES
g. Interim Number Portability	NO	NO ⁶	YES	YES
h. Loop with Interim Number Portability	NO	NO	YES	YES
i. Unbundled Distribution Loop with Interim Number Portability	NO	NO	YES	YES
j. Directory listing	YES	YES	YES	YES
k. Resale Private Line	YES	YES	YES	YES
l. Resale POTS	YES	YES	YES	YES
m. Resale Public Access Line (PAL)	YES	YES	YES	YES
n. Resale PBX	YES	YES	YES	YES
o. Resale ISDN	YES	YES	YES	YES
p. Resale Designed Trunks	Unknown	Unknown	YES	YES
q. Resale Frame Relay	NO	NO	YES	YES
r. Resale DID In Only Trunks	YES	YES	YES	YES
s. Commercial DSL (Broadband for Resale)	YES	YES	YES	YES
t. Unbundled Analog Line Side Switch Port	NO	NO	YES	YES
u. Unbundled Analog Line Side Switch Port ISDN BRI Capable	NO	NO	YES	YES
v. Unbundled Analog DID/PBX Trunk Port	NO	NO	YES	YES
w. Unbundled DS1 DID/PBX Trunk or Trunk Port Facility	NO	NO	YES	YES
x. UNEP ISDN BRI	NO	NO	YES	YES
y. UNEP POTS	YES	YES	YES	YES
z. UNEP Centrex	YES	YES	YES	YES
aa. UNEP Centrex 21	Unknown	Unknown	YES	YES
bb. UNE-P DSS Facility	Unknown	Unknown	YES	YES
cc. UNE-P DSS Trunk	Unknown	Unknown	YES	YES
dd. UNE-P PRI ISDN Facility	NO	NO	YES	YES
ee. UNE-P PRI ISDN Trunk	NO	NO	YES	YES
ff. UNE-P PBX DID-In only trunk	YES	YES	YES	YES

⁶ Embarq's website states: "**Interim Number Portability Service** Interim Number Portability (INP) is provided by EMBARQ only where Local Number Portability (LNP) has not yet been implemented." (See http://embarq.centurylink.com/wholesale/docs/guides/une_guide.pdf)

gg. UNE-P PBX Design Trunk	Unknown	Unknown	YES	YES
hh. EEL/UNE Combination	YES	YES	YES	YES
ii. Resale Centrex	YES	YES	YES	YES
jj. Line Split UNEP POTS	NO	NO	YES	YES
kk. Line Split UNEP PBX Design Trunk	NO	NO	YES	YES
ll. Split UNEP Centrex 21	NO	NO	YES	YES
mm. Unbundled Loop Split	NO	NO	YES	YES

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 CLECs/21 (Gates)

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

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

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

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

- 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

**BEFORE THE MONTANA PUBLIC SERVICE COMMISSION
DOCKET NO. D2010-5.55
CENTURYLINK RESPONSES TO
INTEGRA'S FIRST SET OF INFORMATION REQUESTS
NOS. 1 THROUGH 168**

162. Which of the following order types can be performed in 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.
- a. Unbundled Loop
 - b. Unbundled Feeder Loop
 - c. Unbundled Distribution Loop
 - d. Local Number Portability
 - e. Loop with Number Port
 - f. Unbundled Distribution Loop with Number Portability
 - g. Interim Number Portability
 - h. Loop with Interim Number Portability
 - i. Unbundled Distribution Loop with Interim 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 DS1 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

**BEFORE THE MONTANA PUBLIC SERVICE COMMISSION
DOCKET NO. D2010-5.55
CENTURYLINK RESPONSES TO
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- ii. Resale Centrex
- jj. Line Split UNEP POTS
- kk. Line Split UNEP PBX Designed Trunk
- ll. Split UNEP Centrex 21
- mm. Unbundled Loop Split

CenturyLink Response:

- a. Unbundled Loop - Yes
- b. Unbundled Feeder Loop -- CenturyLink is unclear what service or product is being described in this question.
- c. Unbundled Distribution Loop - CenturyLink is unclear what service or product is being described in this question.
- d. Local Number Portability -- Yes
- e. Loop with Number Port -- Yes
- f. Unbundled Distribution Loop with Number Portability - CenturyLink is unclear what service or product is being described in this question.
- g. Interim Number Portability - No we do not allow Interim Number Portability-must be LNP.
- h. Loop with Interim Number Portability - No we do not allow Interim Number Portability-must be LNP.
- i. Unbundled Distribution Loop with Interim Number Portability - No, we do not allow Interim Number Portability-must be LNP.
- j. Directory listing - Yes
- k. Resale Private Line - Yes
- l. Resale POTS - Yes
- m. Resale Public Access Line (PAL) - Yes
- n. Resale PBX - Yes
- o. Resale ISDN - Yes
- p. Resale Designed Trunks - CenturyLink is unclear what service or product is being described in this question.
- q. Resale Frame Relay - Not a current offering.
- r. Resale DID In Only Trunks - Yes
- s. Commercial DSL (Broadband for Resale) - Yes
- t. Unbundled Analog Line Side Switch Port - No, not a current offering
- u. Unbundled Analog Line Side Switch Port ISDN HRI Capable - No, not a current offering.
- v. Unbundled Analog DID/PBX Trunk Port - No, not a current offering.
- w. Unbundled DS1 DID/PBX Trunk or Trunk Port Facility - No, not a current offering.

**BEFORE THE MONTANA PUBLIC SERVICE COMMISSION
DOCKET NO. D2010-5.55
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- x. UNEP ISDN BRI - No, not an offering.
- y. UNEP POTS - Yes
- z. UNEP Centrex - Yes
- aa. UNEP Centrex 21 - CenturyLink is unclear what service or product is being described in this question.
- bb. UNE-P DSS Facility - CenturyLink is unclear what service or product is being described in this question.
- cc. UNE-P DSS Trunk - CenturyLink is unclear what service or product is being described in this question.
- dd. UNE-P PRI ISDN Facility - No, not an offering.
- ee. UNE-P PRI ISDN Trunk - No, not an offering.
- ff. UNE-P PBX DID In-Only Trunk - Yes
- gg. UNE-P PBX Design Trunk - CenturyLink is unclear what service or product is being described in this question.
- hh. EEL/UNE Combination - Yes
- ii. Resale Centrex - Yes
- jj. Line Split UNEP POTS - No, we do not offer Line Splitting.
- kk. Line Split UNEP PBX Designed Trunk - No, we do not offer Line Splitting.
- ll. Split UNEP Centrex 21 - No, we do not offer Line Splitting.
- mm. Unbundled Loop Split - No, we do not offer Line Splitting.

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

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 CLECs/22 (Gates)

PUBLIC VERSION

Joint CLECs/22 contains highly confidential information and is subject to the Highly Confidential Protective Order in Docket UM 1484.

**CERTIFICATE OF SERVICE
UM 1484**

I hereby certify that the **SUPPLEMENTAL TESTIMONY OF TIMOTHY J. GATES ON BEHALF OF tw telecom of oregon, llc, COVAD COMMUNICATIONS COMPANY, LEVEL 3 COMMUNICATIONS, LLC, AND CHARTER FIBERLINK OR-CCVII, LLC** was served on the following persons on November 12, 2010, by email to all parties and by U.S. Mail to parties who have not waived paper service:

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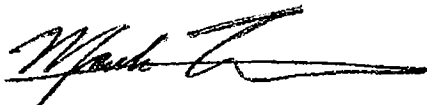
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Dated: November 12, 2010



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