



Qwest
310 SW Park Ave., 11th Floor
Portland, Oregon 97205
Telephone: 503-242-5420
Facsimile: 503-242-8589
e-mail: carla.butler@qwest.com

Carla M. Butler
Lead Paralegal

October 1, 2010

Via Hand Delivery

Mark Trincherro
Davis Wright Tremaine, LLP
1300 SW Fifth Avenue
Portland, OR 97201-5630

Re: Utah Docket No. 10-049-16

Dear Mr. Trincherro:

Enclosed please find both Qwest's and CenturyLink's Response to Integra's Second Set of Data Requests, Nos. 157-181.

CenturyLink's Confidential Attachments to Request No. 180 are printed on yellow paper.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Carla".

Carla M. Butler

Enclosure

Utah
10-049-16
INTEGRA TELECOM 2-157

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 157

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

Utah
10-049-16
INTEGRA TELECOM 2-158

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 158

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

Utah
10-049-16
INTEGRA TELECOM 2-159

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 159

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

Utah
10-049-16
INTEGRA TELECOM 2-160

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 160

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

Utah
10-049-16
INTEGRA TELECOM 2-161

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 161

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

Utah
10-049-16
INTEGRA TELECOM 2-162

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 162

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

Utah
10-049-16
INTEGRA TELECOM 2-163

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 163

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

Utah
10-049-16
INTEGRA TELECOM 2-164

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 164

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.

RESPONSE:

- a. Wholesale ASR supports UOM for pre-order transactions. Wholesale ASR has two large providers submitting orders via UOM.
- b. The ASR XML interface follows industry standards which can be found at <http://www.atis.org/clc/obf/download.htm>. The XML gateway is based on Telecommunications XML standards found in the UOM document.
- c. See <http://www.qwest.com/wholesale/systems/asr.html> (Wholesale ASR Disclosure site). ASR XML Order Technical Specifications - 2/10/10; ASR Transport Schema - 2/10/10; UOM ASR Notify Schema - 2/10/10; tML Transport Schema - 2/10/10 and UOM ASR Schema - 2/10/10 .

In the [asyncRRdiagram.pdf](#) - Qwest's ASR Gateway provides all of the services shown by the entity "Telecom Service Provider".

In the ASR Architecture Model - Qwest's UOM Interface connects to "Large Business CLECs".

Respondents: Tracy Strombotne
Meg Hall
Wayne Spohn

Utah
10-049-16
INTEGRA TELECOM 2-165

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 165

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.

RESPONSE:

IMA is not UOM compliant. IMA has its own XML Gateway and does accept XML files for LSR order submission.

IMA XML Implimentation Guidelines:

http://www.qwest.com/wholesale/downloads/2010/100305/IMA_XMLImplementationGuidelines27_030510.doc.

IMA XML FAQs:

http://www.qwest.com/wholesale/downloads/2009/090307/FAQ_XML_030609.doc.

IMA only offers a custom GUI written in java or the custom XML interface mentioned above.

Respondents: Tracy Strombotne
Meg Hall
Wayne Spohn

Utah
10-049-16
INTEGRA TELECOM 2-166

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 166

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-167

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 167

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-168

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 168

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-169

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 169

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

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-170

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 170

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

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-171

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 171

For any of the above in Request Numbers 13(sic) 169 and 14(sic) 170 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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-172

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 172

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-173

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 173

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-174

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 174

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

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-175

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 175

If the response to Request Number 18(sic) 174 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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-176

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 176

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-177

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 177

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-178

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 178

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-179

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 179

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-180

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 180

Please refer to CenturyLink-Qwest Update #5, dated August 10, 2010.¹ 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.

¹ Available at:

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

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

Utah
10-049-16
INTEGRA TELECOM 2-181

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 181

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.

RESPONSE:

Please see CenturyLink's response to this request.

Respondent: Legal

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

157. 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) after the Closing Date and/or systems integration or potential systems integration and, for each such communication:

- a. State the date of each such communications 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 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 Utah 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 the information that is, and the production of documents that contain, 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 processing or potential processing of ASRs to occur after the Closing Date and/or systems integration or potential systems integration.

Sponsor: Melissa Cloz, Director Wholesale Operations

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

158. 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 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 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 Utah 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.

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 processing or potential processing of LSRs to occur after the Closing Date and/or systems integration or potential systems integration.

Sponsor: Melissa Closz, Director Wholesale Operations

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

159. 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 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 Utah 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.

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 data mapping, data conversion, or other system/integration efforts to occur or be completed after the Closing Date of the merger.

Sponsor: Melissa Cloz, Director Wholesale Operations

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

160. 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 the Merged Company after integration of the 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 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 Utah 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 e-bonding for ASRs, but has not received any formal requests. The inquiries that CenturyLink has received 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 Cloz, Director Wholesale Operations

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

161. 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 the Merged Company after the integration of systems with Qwest, relating to the processing or potential processing of LSRs? If your answer is affirmative (yes):

- a. Identify each vendor or gateway provider with whom you have had such communications, state the date of 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 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 Utah 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 e-bonding for LSRs, but has not received any formal requests. The inquiries that CenturyLink has received 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 Cloz, Director Wholesale Operations

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

162. 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: No decisions have been made regarding the potential consolidation of wholesale OSS systems after the merger.

Sponsor: Melissa Cloz, Director Wholesale Operations

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

163. 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: No decisions have been made regarding the potential consolidation of wholesale OSS systems after the merger.

Sponsor: Melissa Closz, Director Wholesale Operations

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

164. 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 Integra 164.

Sponsor: Ann Prockish, Director Regulatory Operations and Policy

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

165. 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 Integra 165.

Sponsor: Ann Prockish, Director Regulatory Operations and Policy

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

166. 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 performs 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

**STATE OF UTAH
PUBLIC SERVICE COMMISSION
INTEGRA THIRD SET OF DISCOVERY REQUESTS
DOCKET NO. 10-049-16**

167. 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;
- c. Provide CenturyLink documentation indicating that the interface is UOM compliant.

CenturyLink Response:

- a. 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.
- 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/Order and Billing Forum. Interoperability testing is performed for each customer implementation.
- c. CenturyLink performs 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 Cloz, Director Wholesale Operations

