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September 17, 2010

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Re: Utah Docket No. 10-049-16 – Integra Data Request Nos. 157 through 181

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

Enclosed herein is Integra's Data Request Nos. 157 through 181.

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

Mark P. Trinchero
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1300 SW Fifth Avenue
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Gregory Merz
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Minneapolis, MN 55402

Please provide the responses to these requests no later than October 1, 2010. These are continuing requests during the pendency of this proceeding and Respondents' should supplement the responses to the extent additional information becomes available. If you have any questions, please do not hesitate to call me at: 503-778-5318. Thank you in advance to your attention to this matter.

Very truly yours,

Davis Wright Tremaine LLP

Mark Trinchero
Attorneys for Integra Telecom

cc: Service List

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Joint Application of
Qwest Communications International, Inc.,
and CenturyTel, Inc., for Approval of Indirect
Transfer of Control of Qwest Corporation,
Qwest Communications Company LLC, and
Qwest LD Corp.

Docket No. 10-049-16

INTEGRA DATA REQUEST NOS.
157 THROUGH 181

To: The Applicants and their attorneys of record:

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

DEFINITIONS

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

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

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

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

“Synchronoss” refers to Synchronoss Technologies, Inc., including Wisor Telecom Corp.

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

INSTRUCTIONS

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

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

DATA REQUESTS

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.

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.

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.

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.

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.

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.

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

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.

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.

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.

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.

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.

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

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

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

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

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.

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.

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

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

EASE/LSR development roadmap(s), referring or relating to evaluation of pre-population of information.

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.

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.

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.

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.

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.

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.

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

- b. Provide copies of all reports or other feedback that have been submitted by technicians in conjunction with this technician feedback process since the process began.

Dated: September 17, 2010.