

ORIGINAL



0000118817

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

200 OCT 14 P 3:45

DOCKET CONTROL

COMMISSIONERS

- KRISTIN K. MAYES - CHAIRMAN
- GARY PIERCE
- PAUL NEWMAN
- SANDRA D. KENNEDY
- BOB STUMP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

IN THE MATTER OF THE JOINT NOTICE AND)	DOCKET NOS. T-01051B-10-0194
APPLICATION OF QWEST CORPORATION,)	T-02811B-10-0194
QWEST COMMUNICATIONS COMPANY, LLC,)	T-04190A-10-0194
QWEST LD CORP., EMBARQ)	T-20443A-10-0194
COMMUNICATIONS, INC. D/B/A CENTURY)	T-03555A-10-0194
LINK COMMUNICATIONS, EMBARQ)	T-03902A-10-0194
PAYPHONE SERVICES, INC. D/B/A)	
CENTURYLINK, AND CENTURYTEL)	
SOLUTIONS, LLC FOR APPROVAL OF THE)	
PROPOSED MERGER OF THEIR PARENT)	
CORPORATIONS QWEST COMMUNICATIONS)	
INTERNATIONAL INC. AND CENTURYTEL,)	
INC.)	

Arizona Corporation Commission

DOCKETED

OCT 14 2010

DOCKETED BY	
-------------	--

INTEGRA'S MOTION TO COMPEL DISCOVERY

AND

REQUEST FOR EXPEDITED CONSIDERATION

Integra Telecom ("Integra") moves to compel CenturyTel, Inc. ("CenturyLink") to produce all documents and information responsive to Integra's Third Set of Information Requests, including specifically Request Nos. 1 through 9. Counsel for Integra conferred with counsel for CenturyLink and Qwest, but was unable to resolve this dispute without the instant Motion. Because the hearing in this matter is presently scheduled to begin on November 15, Integra requests a compressed briefing schedule so that the motion can be considered on an expedited basis.

1 **ARGUMENT**

2 The Commission's rules of practice and procedure provide that, in matters before the
3 Commission, the Rules of Civil Procedure apply to the extent not inconsistent with the
4 Commission's rules. Ariz. Admin. Code R14-3-216. Arizona's Rules of Civil Procedure, in turn,
5 provide for broad discovery of "any matter, not privileged, that is relevant to a claim or defense of
6 any party. . . . Relevant information sought need not be admissible at trial if the discovery appears
7 reasonably collated to lead to the discovery of admissible evidence." Ariz. R. Civ. P. 26.b(1).
8 "Relevant evidence" is defined to mean "evidence having any tendency to make the existence of
9 any fact that is of consequence to the determination of the action more probably or less probable
10 than it would be without the evidence." Ariz. R. Evid. 401. The documents sought by this motion
11 meet the liberal standard for discovery.

12 Integra propounded its Third Set of Information Requests to CenturyLink and Qwest on
13 September 14, 2010. As to all of these requests, Integra indicated that CenturyLink has a duty to
14 supplement its responses: "These information requests are intended to be continuing in nature.
15 The parties responding to these information requests are asked to promptly supplement their
16 responses to the extent they become aware of information that makes any response inaccurate or
17 incomplete."

18 CenturyLink's responses and supplemental responses¹ to Request Nos. 1 through 9 of
19 Integra's Third Set of Information Requests are attached as Exhibit 1 to this Motion.² Request
20 Nos. 1 and 2 ask CenturyLink to identify each vendor (e.g., DSET or Synchronoss) with which
21 CenturyLink has had any communications regarding systems and/or integration plans related to
22

23 _____
24 ¹ Generally, Qwest's responses incorporated CenturyLink's responses.

25 ² Exhibit 2 to this Motion contains substantially similar questions that were served in Utah, along
26 with CenturyLink's Utah responses and supplemental responses. Exhibit 2 shows that, even when
27 the questions were expanded and, for example, specifically requested emails and other documents
in Utah Request Nos. 160 and 161 (similar to Minnesota Request Nos. 6 and 7), CenturyLink did
not provide the responsive email. To the extent that CenturyLink attempts to argue that its non-
responsiveness is due to the wording of the questions, Exhibit 2 illustrates that this is not the case.

1 processing or potential processing of orders and asks CenturyLink to provide all related
2 documents. Request No. 3 ask CenturyLink to identify each vendor (e.g., DSET or Synchronoss)
3 with which CenturyLink has had any communications regarding systems and/or integration plans
4 including systems/integration efforts and also asks CenturyLink to provide "all documents,
5 including but not limited to emails, that evidence, refer or relate to such communications."

6 Request Nos. 4 and 5 ask whether CenturyLink has communicated with any vendor or
7 gateway provider (e.g., DSET or Synchronoss) that represents CLECs that may request ebonding
8 for processing of orders regarding post-transaction systems consolidation or planning and, if so,
9 requests specifics relating to those communications.

10 Request Nos. 6 and 7 seek information concerning communications between Joint
11 Applicants and vendors or gateway providers relating to ebonding (i.e., an application-to-
12 application interface). Specifically, Request No. 7 asks:

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

- 17 a. Identify each vendor or gateway provider with whom CenturyLink has had
18 such communications;
- 19 b. State the date of each such communications;
- 20 c. Identify each CenturyLink and Qwest employee or representative who
21 participated in such communications."³

22 Local Service Requests ("LSRs") are used by CLECs to place orders for unbundled
23 network elements ("UNEs")⁴ used by CLECs to provide local service. Request No. 6 is otherwise
24 identical, but concerns the processing or potential processing of Access Service Requests

25 _____
26 ³ Exhibit 1.

27 ⁴ An exception is the UNE Unbundled Dedicated Interoffice Transport (UDIT), which is ordered
via ASR in Qwest territory.

1 (“ASRs”) rather than LSRs.⁵ Notably, nothing in either request limits discovery to “formal”
2 communications or “formal” requests for ebonding. Rather, Request Nos. 6 and 7 ask about *any*
3 such communications, and further asks for the identity of the vendor or gateway provider, date of
4 each communication, and the Joint Applicants’ employees or representatives that participated in
5 each communications.⁶ If any such communications have taken place, they may also be
6 considered responsive, depending on the communication, to the more general requests in Request
7 Nos. 1-3, which ask CenturyLink to provide “all documents, including but not limited to emails,
8 that evidence, refer or relate to such communications.”⁷

9 On September 24, CenturyLink admitted that inquiries responsive to Integra’s requests had,
10 in fact, been made. Specifically, CenturyLink’s response stated in its entirety:

11 CenturyLink has received several inquiries from vendors or gateway providers
12 regarding CenturyLink’s capabilities related to ebonding for LSRs, but has not
13 received any formal requests.⁸

14 Yet, despite admitting the existence of responsive communications, CenturyLink
15 produced no documents, identified no vendors or gateway providers, provided no dates, and
16 failed to identify a single employee that participated in such communications.⁹

17 In an effort to resolve the situation without a motion, counsel for Integra sent a letter to
18 counsel for CenturyLink on September 28, 2010.¹⁰ The letter carefully explained the material
19 deficiencies in CenturyLink’s responses.¹¹ Among these deficiencies were the failure to “identify

20 _____
21 ⁵ Exhibit 1.

22 ⁶ *Id.*

23 ⁷ In Utah, substantially similar requests to Arizona Request Nos. 6 and 7 contained subparts also
24 requesting documents and specifically emails [see Exhibit 2, Utah Request Nos. 160(c) and
25 161(c)], but the DSET email discussed below was also not produced by CenturyLink in Utah.

26 ⁸ Exhibit 1, CenturyLink’s response to Request No. 7.

27 ⁹ See Exhibit 1 (showing both Joint Applicants’ initial responses and supplemental responses).

¹⁰ Letter from Gregory R. Merz to Jeffrey Crockett, September 28, 2010. A true and correct copy
of this letter is attached as Exhibit 3 to this Integra Motion to Compel.

¹¹ *Id.*

1 the vendor or gateway provider making inquiries; state the date of the inquiries/communications;
2 or identify each CenturyLink and Qwest employee or representative who participated in such
3 communications.” The letter plainly pointed out that Integra’s requests were in no way limited by
4 the concept of a “formal request.”¹²

5 On October 6, 2010, CenturyLink provided supplemental responses to Integra’s Third Set
6 of Discovery Requests. Presented with this second chance to provide the information required by
7 Integra’s Third Set of Information Requests, CenturyLink’s supplemental responses again
8 produced no documents, identified no vendors or gateway providers, provided no dates, and
9 identified no employees. CenturyLink’s October 6, 2010, supplemental responses to Request No.
10 6 stated:

11 “The inquiries that CenturyLink has received from vendors or gateway
12 providers regarding CenturyLink’s capabilities for ASRs were informal
13 discussions that were informational in nature. Because of the informal
14 nature of these inquiries, no notes were taken and no other documentation
exists regarding these inquiries.”¹³

15 With respect to Request No. 7, CenturyLink also denied that any responsive documents
16 exist:

17 “The inquiries that CenturyLink has received from vendors or gateway
18 providers regarding CenturyLink’s capabilities for LSRs were informal
19 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.”¹⁴

20
21 CenturyLink again declined to provide any details on communications, and instead
22 unequivocally denied that records of such communications existed, stating “no notes were taken
23 and no other documentation exists.”¹⁵

24 _____
25 ¹² *Id.* at 2.

26 ¹³ Exhibit 1.

27 ¹⁴ *Id.*

¹⁵ *Id.*

1 That statement, however, is inconsistent with the facts. As a customer interested in doing
2 business with DSET,¹⁶ Integra received an example of documentation that CenturyLink has
3 represented does not exist. Specifically, provided with this Motion is an email regarding this very
4 subject matter between CenturyLink and DSET.¹⁷ DSET is a gateway provider to CLECs for
5 electronic interfaces with Qwest's Operations Support Systems ("OSS").¹⁸

6 Integra asked DSET, as a gateway provider, about OSS following any merger between
7 Qwest and CenturyLink and specifically asked about ebonding for LSRs.¹⁹ By way of a response,
8 on September 1, 2010, Jim Seigler of DSET, when sending a follow-up email to Mike Norton of
9 CenturyLink (the "DSET email"), blind-copied Stephanie Prull, an Integra IT Analyst, on the
10 DSET email.²⁰

11 In the DSET email, Mr. Seigler refers to customers that want ebonding relating to both
12 ASR and LSR processing – the subject matter of Request Nos. 6 and 7. Mr. Seigler confirms the
13 conversation with CenturyLink to the effect that, after the merger, when all the systems have been
14 consolidated, the merged company will support a Unified Order Management (UOM) interface for
15 both ASRs and LSRs.²¹ This represents a change for wholesale customers because Qwest's ASR
16 interface is UOM-compliant but its LSR interface is not.²²

17 On October 1, 2010, Mr. Timothy Gates of QSI Consulting filed surrebuttal testimony in
18 the merger proceeding on behalf of the Joint CLECs in Minnesota. In his testimony, Mr. Gates
19 explained the significance of the information regarding UOM compliance and CenturyLink's
20 admission, stating:

21

22

23

24

25

26

27

¹⁶ Declaration of Stephanie Prull ("Prull Decl."), ¶¶ 3-4, attached as Exhibit 4.

¹⁷ Attachment A to Prull Decl.

¹⁸ Prull Decl., ¶ 2.

¹⁹ Prull Decl., ¶ 3.

²⁰ Prull Decl., ¶4.

²¹ Attachment A to Prull Decl.

²² Exhibit 1 (Qwest and CenturyLink responses to Request Nos. 8-9).

1 “These responses necessarily mean that the interface Qwest currently uses
2 to process CLEC LSRs (Interconnect Mediated Access or “IMA”) will no longer
3 be available in its present form. CenturyLink will either replace it or modify it. If
4 CenturyLink considers its EASE system to be UOM compliant, CenturyLink’s
5 response may suggest an intention by CenturyLink to use EASE for LSRs,
6 contrary to the recommendation of the Joint CLECs. . . . In any event, the
7 discovery responses confirm that CenturyLink does not intend to use Qwest IMA
8 as it exists today. Investigation is needed, therefore, into how and when
9 CenturyLink intends to change or replace Qwest’s IMA. CenturyLink still has not
10 provided any explanation as to when or how it will implement its plan to, after
11 systems consolidation, support a UOM compliant system.”²³

12 Later the same day, CenturyLink supplemented its responses to Integra’s information
13 requests Nos. 8 and 9 in Minnesota. Since then, it has supplemented similar responses in a similar
14 manner in other states, including Arizona. CenturyLink had previously responded that “Yes, after
15 the systems have been consolidated after the merger, the company intends to support a UOM
16 interface for LSRs.”²⁴ CenturyLink contradicted its own response (and the DSET email) when it
17 supplemented its response to Request No. 9 to assert: “CenturyLink clarifies that no decisions
18 have been made regarding the potential consolidation of systems after the merger.”²⁵

19 DSET interfaces with telecommunications carriers and serves telecommunications carriers
20 as customers and potential customers. DSET is not a party to this merger proceeding. It should
21 not be necessary for Integra to have to, in order to obtain complete and accurate discovery
22 responses, point CenturyLink to an email communication it had with DSET. Plainly CenturyLink
23 is aware of this communication. CenturyLink has brought the merger proceeding and has an
24 obligation to diligently search its records and provide complete, accurate responses to discovery
25 conducted in that proceeding. Because CenturyLink was not forthcoming in its discovery
26 responses, however, Integra has had to provide the DSET email as support for this motion.

25 ²³ Surrebuttal Testimony of Timothy Gates of QSI, Public, Minnesota Docket No. P-421, et
26 al./PA-10-456 (October 1, 2010), pp. 23-24.

27 ²⁴ Exhibit 1 (Qwest and CenturyLink responses to Request No. 9).

²⁵ Exhibit 1 (CenturyLink supplemental responses to Request No. 9).

1 CenturyLink has had the DSET email since September 1, 2010 -- the date it was sent to Mr.
2 Norton's CenturyLink email address. Moreover, the email indicates that it is confirming earlier
3 communications that were also not described in CenturyLink's discovery responses. But,
4 CenturyLink has never produced the DSET email, never identified DSET as a gateway provider
5 with whom CenturyLink has had such communications, and has never identified Mr. Norton as an
6 employee participating in such communications. This is true even though DSET is one of the
7 providers *expressly named* in several information requests, including Requests Nos. 6 and 7.
8 Rather than produce the email in response to Integra's requests, CenturyLink's supplemental
9 responses denied its existence, stating that "no notes were taken and no other documentation exists
10 regarding these inquiries."²⁶

11 Obviously, such documentation does exist. CenturyLink's responses reveal that
12 CenturyLink has either failed to conduct a reasonable inquiry concerning such material or is
13 withholding such materials. Given that Integra identified DSET specifically, by name, in its
14 request, there is no reason that CenturyLink failed to reference or produce the DSET email. This
15 is particularly true because Mr. Norton appears to work in relatively close proximity to Melissa
16 Closz, CenturyLink's Director Wholesale Operations.²⁷ CenturyLink identified Ms. Closz as the
17 "sponsor" for CenturyLink's responses to Integra's Request Nos. 1-9.²⁸ The Commission should
18 investigate whether CenturyLink, and Ms. Closz in sponsoring this answer, made any inquiries of
19 Mr. Norton as part of CenturyLink's duty to conduct a reasonable inquiry.

20 There is an additional reason to investigate generally what steps CenturyLink is taking to
21 meet its duty to conduct a reasonable inquiry when responding to discovery requests. In his
22 surrebuttal testimony in Minnesota, Mr. Gates described Integra June 2010 discovery requests to
23 CenturyLink regarding integration efforts undertaken by the company for CenturyTel's acquisition
24

25 _____
26 ²⁶ Exhibit 1 (Qwest and CenturyLink responses to Request Nos. 8-9).

27 ²⁷ Prull Decl., ¶5.

²⁸ Exhibit 1.

1 of Embarq²⁹ and asked CenturyLink to provide a “Description of problems the company
2 experienced (or is experiencing) during integration.”³⁰ In its initial and supplemental responses,
3 CenturyLink stated that the integrations were proceeding as planned, without disclosing any of the
4 problems that CenturyLink has acknowledged only after CWA brought them to light in
5 testimony.³¹ Even though Duane Ring, President of the Northeast Region for CenturyLink later
6 testified about these very problems, at the hearing Mr. Ring said that he was seeing these discovery
7 requests and responses for the first time on the witness stand; that he had not participated in
8 preparation of CenturyLink’s Responses; and that the person identified by CenturyLink as
9 sponsoring the responses was a regulatory person.³² Together with CenturyLink’s failure to
10 produce the DSET email, this raises questions about whether and how CenturyLink is meeting its
11 duty to conduct a reasonable inquiry. Without a reasonable inquiry, however, the responses cannot
12 be relied upon as accurate or complete.

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

21

22

23 ²⁹ Surrebuttal Testimony of Timothy Gates of QSI, Public, Minnesota Docket No. P-421, et
al./PA-10-456 (October 1, 2010), pp. 13-16.

24 ³⁰ Integra Minnesota Information Request Number 41 to Joint Petitioners (June 28, 2010).

25 ³¹ Surrebuttal Testimony of Timothy Gates of QSI, Public, Minnesota Docket No. P-421, et
al./PA-10-456 (October 1, 2010), p. 14.

26 ³² See Exhibit 5 Minnesota Docket No. P-421 et. al/PA-10-456, Transcript 2A (excerpts). The
27 court reporter has not yet finalized the transcript; the excerpts provided are from the court
reporter’s draft transcript.

1 **REQUEST FOR EXPEDITED CONSIDERATION**

2 Integra believes that the evidence sought by this motion will be relevant to the issues to be
3 determined in this docket. Because the hearing in this matter is scheduled to begin on November
4 15, an expedited resolution of the motion is necessary to enable Integra to present that evidence for
5 the Commission's consideration. Accordingly, Integra requests the Commission adopt a
6 compressed briefing schedule in order to allow the motion to be considered on an expedited basis.

7
8 RESPECTFULLY SUBMITTED this 14th day of October 2010.

9
10 By 

11 Michael W. Patten
12 Roshka DeWulf & Patten, PLC
13 One Arizona Center
14 400 East Van Buren Street, Suite 800
15 Phoenix, Arizona 85004

16 Gregory Merz (Pro Hac Vice)
17 Gray Plant Mooty
18 500 IDS Center
19 80 South Eighth Street
20 Minneapolis, Minnesota 55402

21 Attorney for Eschelon Telecom of Arizona, Inc., Electric
22 Lightwave, LLC and Mountain Telecommunications of
23 Arizona, Inc. dba Integra Telecom
24
25
26
27

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

ROSHKA DeWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 **Original and 13 copies of the foregoing**
2 filed this 14th day of October 2010 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 Copy of the foregoing hand-delivered/mailed
8 this 14th day of October 2010 to:

9 Norman Curtright
10 Qwest Corporation
11 20 East Thomas Road, 16th Floor
12 Phoenix, Arizona 85012

13 Jeffrey W. Crockett
14 Bradley Carroll
15 Snell & Wilmer
16 One Arizona Center
17 400 E. Van Buren
18 Phoenix, Arizona 85004

19 Kevin K. Zarling, Esq.
20 Senior Counsel
21 CenturyLink
22 400 West 15th Street, Suite 315
23 Austin, Texas 78701

24 Daniel Pozefsky
25 Residential Utility Consumer Office
26 1100 West Washington, Ste 220
27 Phoenix, Arizona 85007

Joan S. Burke
Law Office of Joan S. Burke
1650 North First Avenue
Phoenix, Arizona 85003

Nicholas J. Enoch, Esq
Jarrett J. Haskovec, Esq
Lubin & Enoch, PC
349 North Fourth Avenue
Phoenix, Arizona 85003
Scott J. Rubin, Esq
333 Oak Lane
Bloomsburg, Pennsylvania 17815

Gregory L. Rogers
Level 3 Communications, LLC
1025 Eldorado Blvd.
Broomfield, CO 80021

Rogelio Peña
Peña & Associates, LLC
4845 Pearl East Circle, Suite 101
Boulder, CO 80301

William A. Haas
Vice President of Public Policy & Regulatory
PAETEC Holding Corp.
One Martha's Way,
Hiawatha, Iowa 52233

Karen L. Clauson
Vice President, Law & Policy
Integra Telecom
6160 Golden Hills Drive
Golden Valley, Minnesota 55416-1020

Gregory Merz
Gray Plant Mooty
500 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402

Stephen S. Melnikoff, Esq
Regulatory Law Office
U. S. Army Litigation Center
901 North Stuart Street, Suite 700
Arlington, Virginia 22203

ROSHKA DeWULF & PATTEN, PLC

ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 Harry Gildea
2 Snavelly King Majoros O'Connor & Bedell,
3 Inc.
4 1111 14th Street, N.W., Suite 300
5 Washington, D.C. 20005

6 Lyndall Nipps
7 Vice President, Regulatory
8 Tw telecom
9 9665 Granite Ridge Drive, Suite 500
10 San Diego, California 92123

11 Rex Knowles
12 Executive Director
13 XO Communications
14 7050 Union Park Avenue, Ste 400
15 Midvale, Utah 84047

16 James C. Falvey
17 Senior Regulatory Counsel
18 Pac-West Telecomm, Inc.
19 420 Chinquapin Round Red, Ste 2-1
20 Annapolis, Maryland 21401

21 Michel Singer Nelson
22 360networks (USA), Inc.
23 370 Interlocken Blvd, Suite 600
24 Broomfield, Colorado 80021

25 Penny Stanley
26 360networks (USA), Inc.
27 370 Interlocken Blvd, Suite 600
Broomfield, Colorado 80021

Katherine K. Mudge
DIECA Communications dba Covad
Communications Company
Director, State Affairs & ILEC Relations
7000 N. Mopac Expressway, 2d Floor
Austin, Texas 78731

Belinda Martin, Esq.
Administrative Law Judge
Hearing Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Maureen A. Scott, Esq.
Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Steve Olea
Director, Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

17 By 

18
19
20
21
22
23
24
25
26
27

Exhibit

"1"

Snell & Wilmer
L.L.P.
LAW OFFICES

One Arizona Center
400 East Van Buren Street
Suite 1900
Phoenix, Arizona 85004-2202
602.382.6000
602.382.6070 (Fax)
www.swlaw.com

Jeffrey W. Crockett
602.382.6234
jcrockett@swlaw.com

September 24, 2010

DENVER
LAS VEGAS
LOS ANGELES
LOS CABOS
ORANGE COUNTY
PHOENIX
SALT LAKE CITY
TUCSON

Michael W. Patten (via hand delivery)
Roshka DeWulf & Patten, PLC
400 East Van Buren, Suite 800
Phoenix, Arizona 85004

Gregory Merz (via first class mail)
Gray Plant Mooty
500 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402

Karen L. Clauson (via first class mail)
Integra Telecom
6160 Golden Hills Drive
Golden Valley, Minnesota 55416

Re: Responses of CenturyLink to Integra Telecom's Third Set of Data Requests to CenturyLink—Docket Nos. T-01051B-10-0194, T-02811B-10-0194, T-04190A-10-0194, T-20443A-10-0194, T-03555A-10-0194 and T-03902A-10-0194

Dear Mike, Greg and Karen:

Attached are the responses of CenturyLink to Integra Telecom's Third Set of Data Requests in the above-referenced dockets.

Very truly yours,

SNELL & WILMER


Jeffrey W. Crockett

JWC:gdb

cc (with enclosures): Daniel W. Pozefsky, Esq.
William Rigsby
Reed Peterson

Michael W. Patten
Gregory Merz
Karen L. Clauson
September 24, 2010
Page 2

Nicholas J. Enoch, Esq.
Scott J. Rubin, Esq.
Gregory L. Rogers
Rogelio Pena
Karen L. Clauson
Gregory Merz
William Haas
Mark DiNunzio
Katherine Mudge
Mark Harper

cc (w/o enclosures): Kevin Zarling, Esq.
Norm Curtright, Esq.

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2
3 COMMISSIONERS

4 KRISTIN K. MAYES, Chairman
5 GARY PIERCE
6 PAUL NEWMAN
7 SANDRA D. KENNEDY
8 BOB STUMP

9 JOINT NOTICE AND APPLICATION OF
10 QWEST CORPORATION, QWEST
11 COMMUNICATIONS COMPANY, LLC,
12 QWEST LD CORP., EMBARQ
13 COMMUNICATIONS, INC., D/B/A
14 CENTURYLINK COMMUNICATIONS,
15 EMBARQ PAYPHONE SERVICES, INC.
16 D/B/A CENTURYLINK, AND
CENTURYTEL SOLUTIONS, LLC FOR
THE APPROVAL OF THE PROPOSED
MERGER OF THEIR PARENT
CORPORATIONS QWEST
COMMUNICATIONS INTERNATIONAL
INC. AND CENTURYTEL, INC.

DOCKET NOS. T-01051B-10-0194
T-02811B-10-0194
T-04190A-10-0194
T-20443A-10-0194
T-03555A-10-0194
T-03902A-10-0194

17 **RESPONSES OF CENTURYLINK TO INTEGRA TELECOM'S THIRD SET OF DATA**
18 **REQUESTS**

19 CenturyLink hereby submits its Objections and Responses to Integra Telecom's Third Set
20 of Data Requests in the above-captioned proceeding, served on CenturyLink on September 14,
21 2010.

22 **INFORMATION REQUESTS**

23 1. Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau
24 (e.g., Neustar, Telcordia, Accenture) which you have had any communications regarding systems
25 and/or integration plans regarding processing or potential processing of ASRs after the Closing
Date and, for each such communication:

- 26 a. Provide all documents, including but not limited to all emails, that evidence, refer
27 or relate to such communications;
- 28 b. State the date of each such communications;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- c. Identify each CenturyLink and Qwest employee or representative who participated in such communications.

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 Arizona 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.

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

Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

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

- a. Provide all documents, including but not limited to all emails, that evidence, refer or relate to such communications;
- b. State the date of each such communications;
- c. Identify each CenturyLink and Qwest employee or representative who participated in such communications.

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 Arizona 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.

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

Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

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

- 4 a. Provide all documents, including but not limited to all emails, that evidence, refer
5 or relate to such communications;
- 6 b. State the date of each such communications;
- 7 c. Identify each CenturyLink and Qwest employee or representative who
8 participated in such communications.

8 **Objections:** CenturyLink objects to this request because it is vague, ambiguous, overly broad,
9 unduly burdensome and excessively time consuming as written and, as such, is
10 not relevant or likely to lead to the discovery of admissible evidence in this
11 proceeding. In addition, CenturyLink objects to this request to the extent it
12 applies to matters other than Arizona intrastate operations subject to the
13 jurisdiction of the Commission as such matters are irrelevant and not reasonably
14 calculated to lead to the discovery of admissible evidence. CenturyLink further
15 objects to the request to the extent that it calls for information that is, and the
16 production of documents that contain, third-party proprietary information which is
17 subject to a confidentiality agreement.

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

17 **Prepared by:** Melissa Closz, Director Wholesale Operations, CenturyLink

18 4. Has CenturyLink communicated with any vendor or gateway provider (e.g.,
19 DSET or Synchronoss) that represents a CLEC or CLECs that may, after the Closing Date,
20 request or engage in ebonding relating to the processing or potential processing of ASRs with
21 which CenturyLink has had communications regarding post-transaction systems consolidation or
22 planning? If your answer is "Yes":

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

26 **Objections:** CenturyLink objects to this request because it is vague, ambiguous, overly broad,
27 unduly burdensome and excessively time consuming as written and, as such, is
28 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

1 applies to matters other than Arizona intrastate operations subject to the
2 jurisdiction of the Commission as such matters are irrelevant and not reasonably
3 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.

4 **Response:** Subject to and without waiving its objections, CenturyLink provides the following
5 response: CenturyLink has not communicated with any vendor or gateway
6 provider regarding ebonding for the processing of ASRs after the closing date of
the merger, or regarding any related post-transaction systems consolidation or
planning.

7 **Prepared by:** Melissa Closz, Director Wholesale Operations, CenturyLink

8
9 5. Has CenturyLink communicated with any vendor or gateway provider (e.g.,
10 DSET or Synchronoss) that represents a CLEC or CLECs that may, after the Closing Date,
11 request or engage in ebonding relating to the processing or potential processing of LSRs with
which CenturyLink has had communications regarding post-transaction systems consolidation or
planning? If your answer is "Yes":

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

17 **Objections:** CenturyLink objects to this request because it is vague, ambiguous, overly broad,
18 unduly burdensome and excessively time consuming as written and, as such, is
19 not relevant or likely to lead to the discovery of admissible evidence in this
20 proceeding. In addition, CenturyLink objects to this request to the extent it
21 applies to matters other than Arizona 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.

22 **Response:** Subject to and without waiving its objections, CenturyLink provides the following
23 response: CenturyLink has not communicated with any vendor or gateway
24 provider regarding ebonding for the processing of LSRs after the closing date of
the merger, or regarding any related post-transaction systems consolidation or
planning.

25 **Prepared by:** Melissa Closz, Director Wholesale Operations, CenturyLink

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

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

6 **Objections:** CenturyLink objects to this request because it is vague, ambiguous, overly broad,
7 unduly burdensome and excessively time consuming as written and, as such, is
8 not relevant or likely to lead to the discovery of admissible evidence in this
9 proceeding. In addition, CenturyLink objects to this request to the extent it
10 applies to matters other than Arizona 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.

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

14 **Prepared by:** Melissa Closz, Director Wholesale Operations, CenturyLink

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

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

22 **Objections:** CenturyLink objects to this request because it is vague, ambiguous, overly broad,
23 unduly burdensome and excessively time consuming as written and, as such, is
24 not relevant or likely to lead to the discovery of admissible evidence in this
25 proceeding. In addition, CenturyLink objects to this request to the extent it
26 applies to matters other than Arizona 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.

27 **Response:** Subject to and without waiving its objections, CenturyLink provides the following
28 response: CenturyLink has received several inquiries from vendors or gateway

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

providers regarding CenturyLink's capabilities related to ebonding for LSRs, but has not received any formal requests.

Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

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

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

Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

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

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

Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

10. 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;
- c. Provide Qwest documentation indicating that the interface is UOM compliant.

Response: Please see Qwest's response to Integra 10.

Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

11. 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;
- c. Provide Qwest documentation indicating that the interface is UOM compliant.

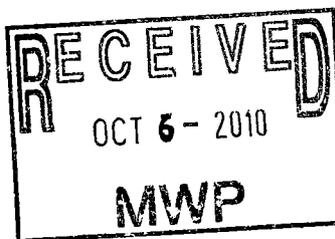
Response: Please see Qwest's response to Integra 11.

Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

Snell & Wilmer
L.L.P.
LAW OFFICES

One Arizona Center
400 East Van Buren Street
Suite 1900
Phoenix, Arizona 85004-2202
602.382.6000
602.382.6070 (Fax)
www.swlaw.com

Jeffrey W. Crockett
602.382.6234
jcrockett@swlaw.com



DENVER
LAS VEGAS
LOS ANGELES
LOS CABOS
ORANGE COUNTY
PHOENIX
SALT LAKE CITY
TUCSON

October 6, 2010

Michael W. Patten (via hand-delivery)
Roshka DeWulf & Patten, PLC
400 East Van Buren, Suite 800
Phoenix, Arizona 85004

Gregory Merz (via first class mail)
Gray Plant Mooty
500 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402

Re: Supplemental Response of CenturyLink (including Confidential Attachments) to Integra Telecom's Third Set of Data Requests (Docket Nos. T-01051B-10-0194, T-02811B-10-0194, T-04190A-10-0194, T-20443A-10-0194, T-03555A-10-0194 and T-03902A-10-0194)

Dear Mike and Greg:

Enclosed please find supplemental responses to Integra Telecom's Third Set of Data Requests in the above-referenced consolidated cases. Please note that the attachments to the supplemental responses are Confidential Information pursuant to the terms of the protective order entered in this case.

Very truly yours,

SNELL & WILMER

A handwritten signature in black ink, appearing to read "Jeff Crockett".

Jeffrey W. Crockett

JWC:gdb
cc (w/enclosures): Reed Peterson
Mark Harper
Daniel Pozefsky

Messrs. Patten and Merz

October 6, 2010

Page 2

William Rigsby
Gregory L. Rogers
Rogelio Pena
Mark DiNunzio
Gregory Merz
William Haas
Katherine Mudge
Nicholas J. Enoch
Michael W. Patten
Karen L. Clauson

cc (w/o enclosures) Norm Curtright
Kevin Zarling

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2
3 COMMISSIONERS

4 KRISTIN K. MAYES, Chairman
5 GARY PIERCE
6 PAUL NEWMAN
7 SANDRA D. KENNEDY
8 BOB STUMP

9 JOINT NOTICE AND APPLICATION OF
10 QWEST CORPORATION, QWEST
11 COMMUNICATIONS COMPANY, LLC,
12 QWEST LD CORP., EMBARQ
13 COMMUNICATIONS, INC., D/B/A
14 CENTURYLINK COMMUNICATIONS,
15 EMBARQ PAYPHONE SERVICES, INC.
16 D/B/A CENTURYLINK, AND
CENTURYTEL SOLUTIONS, LLC FOR
THE APPROVAL OF THE PROPOSED
MERGER OF THEIR PARENT
CORPORATIONS QWEST
COMMUNICATIONS INTERNATIONAL
INC. AND CENTURYTEL, INC.

DOCKET NOS. T-01051B-10-0194
T-02811B-10-0194
T-04190A-10-0194
T-20443A-10-0194
T-03555A-10-0194
T-03902A-10-0194

17 **SUPPLEMENTAL RESPONSES (INCLUDING CONFIDENTIAL**
18 **ATTACHMENTS) OF CENTURYLINK TO INTEGRA TELECOM'S THIRD**
19 **SET OF DATA REQUESTS**

20 CenturyLink hereby submits its Supplemental Responses to Integra's Third Set of
21 Information Requests in the above-captioned dockets, served on CenturyLink on
22 September 14, 2010.

23 **General Objections**

- 24 1. CenturyLink objects to these Requests insofar as they seek to impose obligations on
25 CenturyLink that exceed the requirements of the Arizona discovery rules.
26 2. CenturyLink objects to these requests to the extent they seek to impose undue burden
27 associated with producing documents in Native Format. CenturyLink will produce
28 information in such form if it is readily available. If documents are not readily
produced in such format, CenturyLink will provide information in an appropriate

1 requested format upon Integra's agreement to compensate CenturyLink for the costs
2 of producing documents in such format.

- 3 3. To the extent these requests apply to matters other than Arizona intrastate operations
4 subject to the jurisdiction of the Commission, CenturyLink objects to such request as
5 irrelevant, overly broad, unduly burdensome and not reasonably calculated to lead to
6 the discovery of admissible evidence. Subject to and without waiving this objection,
7 to the extent not otherwise objectionable, CenturyLink will respond to such Request
8 with information that is specific to Arizona and, where appropriate, will also include
9 total company information for CenturyLink.
- 10 4. To the extent these requests seek information for a five year time period, CenturyLink
11 objects to such requests as overly broad, unduly burdensome, excessively time
12 consuming and not reasonably calculated to lead to the discovery of admissible
13 evidence. Generally, CenturyLink will respond to such requests by producing year
14 end 2008 and 2009 data.
- 15 5. CenturyLink, Inc. is a holding company with employees located in many different
16 locations. In the course of its business, CenturyLink creates countless documents that
17 are not subject to Commission or FCC retention of records requirements. These
18 documents are kept in numerous locations. Therefore, it is possible that not every
19 document will be provided in response to these discovery requests. Rather,
20 CenturyLink will provide, subject to any applicable objections, all of the information
21 obtained by CenturyLink after a reasonable and diligent search conducted in
22 connection with these requests. CenturyLink will conduct a search of those files that
23 are reasonably expected to contain the requested information. To the extent that the
24 discovery requests purport to require more, CenturyLink objects on the grounds that
25 compliance will pose an undue burden or expense.
- 26 6. Where CenturyLink's response to any discovery request refers to a Qwest response,
27 CenturyLink incorporates by reference any objections made by Qwest in the indicated
28 response.
7. CenturyLink incorporates these general objections in each of its responses.

Supplemental Responses to Data Requests

1. Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau
(e.g., Neustar, Telcordia, Accenture) which you have had any communications
regarding systems and/or integration plans regarding processing or potential
processing of ASRs after the Closing Date and, for each such communication:
- a. Provide all documents, including but not limited to all emails, that
evidence, refer or relate to such communications;

- 1 b. State the date of each such communications;
- 2 c. Identify each CenturyLink and Qwest employee or representative who
- 3 participated in such communications.

4 Objections: CenturyLink objects to this Request because it is vague, ambiguous, overly

5 broad, unduly burdensome and excessively time consuming as written and,

6 as such, is not relevant or likely to lead to the discovery of admissible

7 evidence in this proceeding. In addition, CenturyLink objects to this request

8 to the extent it applies to matters other than Arizona intrastate operations

9 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.

10 Response: Subject to and without waiving its objections, CenturyLink provides the

11 following response: CenturyLink has not communicated with any vendors

12 regarding systems and/or integration plans for the processing or potential

 processing of ASRs after the closing date of the merger.

13 Prepared by: Melissa Cloz, Director Wholesale Operations, CenturyLink

14 Supplemental Response:

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

16 response: CenturyLink clarifies that is has not communicated with any service bureaus

17 regarding systems and/or integration plans for the processing or potential processing of

18 ASRs after the closing date of the merger.

19 Prepared by: Melissa Cloz, Director Wholesale Operations, CenturyLink

- 20 2. Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau
- 21 (e.g., Neustar, Telcordia, Accenture) which you have had any communications
- 22 regarding systems and/or integration plans regarding processing or potential
- processing of LSRs after the Closing Date and, for each such communication:
- 23 a. Provide all documents, including but not limited to all emails, that
- 24 evidence, refer or relate to such communications;
- 25 b. State the date of each such communications;
- 26 c. Identify each CenturyLink and Qwest employee or representative who
- 27 participated in such communications.
- 28

1 Objections: CenturyLink objects to this Request because it is vague, ambiguous, overly
2 broad, unduly burdensome and excessively time consuming as written and,
3 as such, is not relevant or likely to lead to the discovery of admissible
4 evidence in this proceeding. In addition, CenturyLink objects to this request
5 to the extent it applies to matters other than Arizona intrastate operations
6 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.

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

10 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

11 Supplemental Response:

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

15 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

16 3. Please identify each vendor (e.g., DSET, Synchronoss) and each service bureau
17 (e.g., Neustar, Telcordia, Accenture) which you have had any communications
18 regarding systems and/or integration plans regarding data mapping, data
19 conversion, or other systems/integration efforts after the Closing Date and, for
each such communication:

- 20 a. Provide all documents, including but not limited to all emails, that
21 evidence, refer or relate to such communications;
- 22 b. State the date of each such communications;
- 23 c. Identify each CenturyLink and Qwest employee or representative who
24 participated in such communications.

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

1 and not reasonably calculated to lead to the discovery of admissible
2 evidence. CenturyLink further objects to the request to the extent that it
3 calls for information that is, and the production of documents that contain,
4 third-party proprietary information which is subject to a confidentiality
5 agreement.

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

11 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

12 Supplemental Response:

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

17 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

18 6. Has any vendor or gateway provider (e.g., DSET or Synchronoss) that represents a
19 CLEC or CLECs indicated that they have CLEC customers who want ebonding
20 relating to the processing or potential processing of ASRs? If your answer is
21 "Yes":

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

27 Objections: CenturyLink objects to this Request because it is vague, ambiguous, overly
28 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 Arizona 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.

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

4 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

5 Supplemental Response:

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

11 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

- 12 7. Has any vendor or gateway provider (e.g., DSET or Synchronoss) that represents a
13 CLEC or CLECs indicated that they have CLEC customers who want ebonding
14 relating to the processing or potential processing of LSRs? If your answer is
"Yes":
- 15 a. Identify each vendor or gateway provider with whom CenturyLink has had
16 such communications;
 - 17 b. State the date of each such communications;
 - 18 c. Identify each CenturyLink and Qwest employee or representative who
19 participated in such communications.

20 Objections: CenturyLink objects to this Request because it is vague, ambiguous, overly
21 broad, unduly burdensome and excessively time consuming as written and,
22 as such, is not relevant or likely to lead to the discovery of admissible
23 evidence in this proceeding. In addition, CenturyLink objects to this request
24 to the extent it applies to matters other than Arizona intrastate operations
25 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.

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

1 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

2 Supplemental Response:

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

8 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

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

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

14 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

15 Supplemental Response:

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

18 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

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

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

24 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

25 Supplemental Response:

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

28 Prepared by: Melissa Closz, Director Wholesale Operations, CenturyLink

Exhibit

"2"



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

Re: Utah Docket No. 10-049-16

Dear Mr. Trinchero:

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 black ink that reads "Carla". The signature is written in a cursive, flowing style.

Carla M. Butler

Enclosure



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

**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 Closz, 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 Cloz, 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 Closz, 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 Closz, 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 ebonding 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 Closz, 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 Closz, 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 fro 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

Exhibit

"3"



500 IDS CENTER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MN 55402-3796
MAIN: 612.632.3000
FAX: 612.632.4444

GREGORY R. MERZ
ATTORNEY
DIRECT DIAL: 612.632.3257
DIRECT FAX: 612.632.4257
GREGORY.MERZ@GPMLAW.COM

September 28, 2010

Jeffrey W. Crockett
Snell & Wilmer LLP
One Arizona Center
400 East Van Buren Street, Suite 1900
Phoenix, AZ 85004-2202

Via E-mail and U.S. Mail

Re: CenturyLink Responses to Integra's Third Set of Information Requests
Arizona Corporation Commission Docket No. T-01051B-10-0194, etc.

Dear Mr. Crockett:

By this letter Integra provides notice of material deficiency in responses provided by your client, CenturyLink, to Integra discovery requests in the above-referenced docket. Specifically, certain CenturyLink Responses to Integra's Third Set of Information Requests, included in your September 27, 2010, response to Integra, were materially deficient.

Enclosed is a list of items to which CenturyLink failed to respond or responded in a materially insufficient manner. On or before the close of business on Friday, October 1, 2010, please provide complete, specific, supplemental information to cure each cited deficiency in the responses. As Integra has previously specified, CenturyLink's responses should be in Word format, not pdf.

Integra looks forward to receipt of complete responses from CenturyLink.

Should you have any questions, you may contact the undersigned.

Sincerely,



Gregory Merz

cc: Karen Clauson

GP:2854459 v1

BEFORE THE CORPORATION COMMISSION OF THE STATE OF ARIZONA
PROCEEDING NO. 10-0194

LIST OF INADEQUACIES OF THE RESPONSES AND OBJECTIONS OF CENTURYLINK, INC. TO
INTEGRA TELECOM'S THIRD SET OF DISCOVERY REQUESTS

Requests # 1 & # 2.

CenturyLink was asked to identify: 1) each vendor and each service bureau with which it had had any communications regarding systems and/or integration plans regarding processing or potential processing of ASRs post-Closing; 2) each vendor and each service bureau with which it had any communications regarding systems and/or integration plans regarding processing or potential processing of LSRs post-Closing.

Inadequacies of response:

CenturyLink did not respond regarding communications with service bureaus.

Requests #2 & #3.

CenturyLink was asked to identify: 1) each vendor and each service bureau with which it had had any communications regarding systems and/or integration plans regarding data mapping, data conversion, or other systems/integration post-Closing.

Inadequacies of response:

CenturyLink did not respond regarding communications with vendors.

Requests #6 & #7.

CenturyLink was asked if any vendor or gateway provider that represents a CLEC or CLECs has indicated that it has CLEC customers who want ebonding related to the processing or potential processing of ASRs/LSRs, and if so, to identify the company, the date of the communication, and the CenturyLink or Qwest employee involved.

Inadequacies of response:

CenturyLink stated that it has received "several inquiries" from vendors or gateway providers regarding CenturyLink's capabilities related to ebonding for ASRs/LSRs but has not received any "formal requests."

CenturyLink failed to: identify the vendor or gateway provider making inquiries; state the date of the inquiries/communications; or identify each CenturyLink and Qwest employee or representative who participated in such communications.

Further, CenturyLink appeared to limit the scope of its reply by introducing a concept that was nowhere in Integra's request: by stating that it had received no "formal request" regarding

ebonding, CenturyLink apparently improperly excused itself from responding regarding anything less than a formal request—such as a communication, the actual subject of Integra’s inquiry.

Request #12.

CenturyLink was asked at (c) if proposals relating to post-closing activities been exchanged between CenturyLink and Wisor/Synchronoss have been exchanged, and if so, to provide any documents.

Inadequacy of response:

CenturyLink answered that “[a]t this time, no decisions have been made with regard to which systems the combined company will use after closing.” Nonresponsive to the question asked—whether *proposals have been exchanged* and if so any documents relating to any such proposal.

Request #13.

CenturyLink was asked to identify for each Pre-Order transaction whether: 1) it is currently provided with EASE; 2) they are applicable to ASRs, LSRs or both; and 3) whether the interface is application to application or GUI or both.

Inadequacy of response:

CenturyLink failed to respond to 2) and 3) above, for each function. CenturyLink cannot depend upon its objection that there was not “a clear explanation of the services or products described” because the functions are all part of Qwest’s own documents —its PCAT and its ICAs.

Request # 14.

CenturyLink was asked; 1) which ordering types CenturyLink currently uses with EASE and if it is not, how a CLEC can otherwise order, and 2)whether they are applicable to ASRs, LSRs or both; and 3) whether the interface is application to application or GUI or both.

Inadequacies of response:

- a. Integra requested that CenturyLink identify what orders types CenturyLink provides using EASE. CenturyLink responded that EASE supports all wholesale order types that are in CenturyLink’s “portfolio” and provided a website for the CenturyLink Guides & Demo, Product & Process.
- b. CenturyLink did not respond to 2) or 3) above..CenturyLink cannot depend upon its objection that there was not “a clear explanation of the services or products described” because the functions are all part of Qwest’s own documents —its PCAT and its ICAs.

Request #16.

Integra requested that CenturyLink describe the criteria for projects.

Inadequacy of response:

CenturyLink's response of "large orders of several hundred numbers are typically treated as a project" is vague and nonresponsive and doesn't describe the criteria for a project.

Requests #18 & #19.

Integra requested that CenturyLink state if EASE as currently implemented by CenturyLink prepopulates information in the LSR, and if not, if the functionality is being evaluated, with timeframes and documents.

Inadequacy of response:

Nonresponsive. CenturyLink states only that "this functionality is on the EASE/LSR development roadmap." CenturyLink does not produce dates, timeframes, or any documents, including development roadmaps.

Request # 27.

Integra requested information regarding the three consulting firms that are currently assisting it with integration planning efforts.

Inadequacy of response:

CenturyLink refused to provide information regarding subparts (c) through (g), re instructions, recommendations, consulting contacts, personnel from the consulting firms. CenturyLink objected as to relevancy, and as to the proprietary nature of the information sought. Integra finds these objections deficient. Any information regarding planning for systems integration is highly relevant to the merger outcome. Integra is willing to consider, e.g., masking of individual consultants' names, if CenturyLink provides the individuals' functions and the reports they provided. Further, the burden to produce these reports and communications is not unduly burdensome, given the critical part that systems integration plays in determining whether the merger is in the public interest.

Request # 28.

Inadequacies of response:

With regard to the technician feedback process implemented by CenturyLink since the consummation of the CenturyTel/Embarq merger:

- a. Integra requested any documentation developed in support of this process. CenturyLink did not provide any documentation.
- b. Integra requested copies of all reports that have been submitted by technicians in conjunction with the technician feedback process since the process began. CenturyLink did not produce any reports.

Exhibit

"4"

BEFORE THE ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, Arizona 85007

IN THE MATTER OF THE JOINT NOTICE
AND APPLICATION OF QWEST
CORPORATION, QWEST
COMMUNICATIONS COMPANY, LLC,
QWEST LD CORP., EMBARQ
COMMUNICATIONS, INC. D/B/A
CENTURY LINK COMMUNICATIONS,
EMBARQ PAYPHONE SERVICES, INC.
D/B/A CENTURLINK, AND
CENTURYTEL SOLUTIONS, LLC FOR
APPROVAL OF THE PROPOSED MERGER
OF THEIR PARENT CORPORATIONS
QWEST COMMUNICATIONS
INTERNATIONAL INC. AND
CENTURYTEL, INC.

DOCKET NOS. T-01051B-10-0194
T-02811B-10-0194
T-04190A-10-0194
T-20443A-10-0194
T-03555A-10-0194
T-03902A-10-0194

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

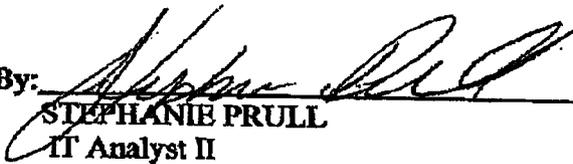
I, Stephanie Prull, declare as follows:

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

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

4. By way of a response to Integra's inquiries, DSET blind-copied me on a September 1, 2010 email from Jim Seigler of DSET to Mike Norton of CenturyLink (the "DSET email").
5. On information and belief, Mr. Norton works with Melissa Cloz, Director Wholesale Operations, in Kansas.²
6. Attached as Attachment A is a true and correct copy of the DSET email.
7. In the DSET email (Attachment A), Mr. Seigler confirms a conversation between DSET and CenturyLink. Mr. Seigler states that, as Mr. Norton of CenturyLink and DSET discussed, after the merger, when all of the systems have been consolidated, the merged company will support a Unified Order Management (UOM) interface for both Access Service Request (ASR) and LSR. Mr. Seigler indicated that DSET has four customers interested in bonding to ASR.
8. In the DSET email (Attachment A), Mr. Seigler also indicates that DSET has seven to ten customers who will want to have an ebonded interface to LSR. Integra is one of those customers. Mr. Seigler asks Mr. Norton of CenturyLink to let DSET "know when that will be available." Integra is one of the customers on whose behalf Mr. Seigler is seeking this information.

DATED this 8th day of October, 2010.

By: 

STEPHANIE PRULL

IT Analyst II

Integra Telecom, Inc.

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

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

Mike,

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

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

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

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

Jim Seigler | Director Sales, Americas | DSET Corporation

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

New Product Announcements

Comptel 2010

Booth 309

September 12-15

Gaylord Convention center, Dallas TX

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

ATTACHMENT A

Exhibit

"5"

EVIDENTIARY HEARING - VOLUME 2A - OCTOBER 6, 2010
BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS
OF THE STATE OF MINNESOTA

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

PUC DOCKET NO: P421, et. al. / PA-10-456

OAH DOCKET NO: 11-2500-21391-2

Met, pursuant to notice, at 9:00 in the
morning on October 6, 2010.

BEFORE: Barbara Neilson, ALJ

REPORTER: Janet Shaddix Eling, RPR

1 A I report to Karen Puckett, the chief operating
2 officer.

3 Q Do you have a counterpart at Qwest?

4 A Not exactly. I guess the closest would be a hybrid
5 between Renee Cottingham (phonetic) and similar to
6 John Stanoch.

7 Q Is it anticipated that there will be any changes in
8 your responsibilities after the merger, assuming
9 it's approved?

10 A Only that the scope of my responsibilities have
11 increased in terms of the number of states.

12 Q And maybe I wasn't very clear. I meant do you
13 anticipate that your responsibilities will change if
14 this transaction is approved by the Commission and
15 CenturyLink is permitted to acquire Qwest?

16 A I'm not sure I understand.

17 Q Are you going to have responsibility for the Qwest
18 territories if the merger is approved?

19 A I will. I will have responsibility for some Qwest
20 territories.

21 Q Including Minnesota?

22 A Including Minnesota.

23 Q And all of Minnesota?

24 A Correct.

25 Q You refer in your summary to your response to

1 Mr. Gurganus, if you'd refer to your rebuttal
2 testimony, and I'm looking specifically at the very
3 first page. And I'm just going to paraphrase. In
4 that testimony you characterize Mr. Gurganus as
5 describing operational problems relating to the
6 integration of CenturyLink and Embarq in North
7 Carolina; is that right?

8 A That's correct.

9 Q And the specific problem was that certain outside
10 plant records were not loaded correctly?

11 A That's correct.

12 Q And it would be fair to describe that as a problem,
13 you'd agree with me about that?

14 A I would agree.

15 Q And you would also agree that it's a problem that
16 would not have occurred but for the integration; is
17 that right?

18 A That's correct.

19 Q When did that problem occur? First, when did you --
20 let me ask you a better question. When did the
21 company first become aware of the problem?

22 A I can only speak to when I first became aware of the
23 problem. That would have been around the end of
24 June, the first of July. I'm assuming that the
25 people in North Carolina knew about that earlier

1 than that.

2 Q And based on what you know now, do you know when the
3 problem first manifested itself?

4 A Not exactly. I think around mid-June.

5 MR. MERZ: Your Honor, I have an exhibit,
6 an IR response I'd like to mark and review with
7 Mr. Ring.

8 JUDGE NEILSON: Okay.

9 (Exhibit 10 marked.)

10 JUDGE NEILSON: You may proceed,
11 Mr. Merz.

12 BY MR. MERZ:

13 Q Mr. Ring, do you have in front of you there what we
14 have marked as Exhibit 9 (sic)?

15 A I do.

16 Q I will represent to you that Exhibit 9 (sic) is a
17 supplemental response to Integra's --

18 JUDGE NEILSON: I'm sorry, I think it's
19 Exhibit 10.

20 MR. MERZ: Oh, it is. I'm sorry.

21 BY MR. MERZ:

22 Q We'll try this again. Do you have in front of you
23 what we've marked as Exhibit 10?

24 A I do.

25 Q And I will represent to you that Exhibit 10 is a

1 supplemental response of CenturyLink to Integra's
2 information request 41. Do you agree that that's
3 what it is?

4 A I agree.

5 MR. MERZ: I will further represent that
6 I have omitted from this exhibit an attachment that,
7 based on its description, is not pertinent to the
8 questions I'm going to ask. I'm happy to add that,
9 but the reason I omitted it is because it's trade
10 secret and I didn't necessarily want to have to
11 burden the record with that additional material, but
12 if Joint Applicants' attorneys want to add that in,
13 I have no objection to doing so.

14 MS. MASTERTON: No, that's okay.

15 MR. MERZ: Okay. And so, Your Honor,
16 Integra offers Exhibit Number 10.

17 JUDGE NEILSON: Is there any objection?
18 It will be received.

19 (Exhibit 10 offered and received.)

20 BY MR. MERZ:

21 Q Mr. Ring, do you know when you first saw this
22 information request?

23 A This information request?

24 Q Yes.

25 A Right now.

1 Q Have you ever seen the response?

2 A I have not.

3 Q Were you ever informed that a request had been made
4 that CenturyLink describe problems the company
5 experienced during integration of the Embarq
6 systems?

7 A I was aware that I provided rebuttal testimony about
8 the problems.

9 Q You see that subpart j. of this request seeks a
10 description of problems the company experienced or
11 is experiencing during integration as referring to
12 Embarq, you see that, don't you?

13 A Um-hum.

14 Q Yes?

15 A I do.

16 Q Now, you would also agree with me that in this
17 response, as well as the supplemental response,
18 there is no reference at all to the North Carolina
19 problem that we've been talking about this morning;
20 is that right?

21 A That's correct.

22 Q Who is Ann Prockish? She's the person identified as
23 sponsoring this particular response.

24 A She's our director of regulatory operations and
25 policy.

1 Q She's not somebody, I take it, that you know?

2 A I know her.

3 Q Okay.

4 JUDGE NEILSON: Can you just spell her
5 last name for the record?

6 MR. MERZ: I can. It's P-R-O-C-K-I-S-H.

7 JUDGE NEILSON: Thank you.

8 BY MR. MERZ:

9 Q Does Ms. Prockish report to you?

10 A She does not.

11 Q Does she report to someone that reports to you?

12 A No.

13 Q What are her job duties?

14 A Regulatory policy.

15 Q You did not have any role in preparing the response
16 to Integra's request number 41?

17 A I did not.

18 Q You would agree with me that the response to request
19 number 41 is not accurate?

20 A And not accurate, can you be specific?

21 Q Specific with respect to the request that is made
22 there at subpart j. of 41.

23 A I don't know if I can agree with that. I think the
24 question really is when did we actually know that we
25 were having the problems based on when this was

1 asked.

2 Q So you believe that you may have learned of this
3 problem after this response was made?

4 A I can only assume that.

5 MR. MERZ: I have nothing further.

6 JUDGE NEILSON: Mr. Lipschultz.

7 MR. LIPSCHULTZ: Thank you, Your Honor.

8 CROSS-EXAMINATION

9 BY MR. LIPSCHULTZ:

10 Q Good morning, Mr. Ring.

11 A Good morning.

12 Q I just want to ask you a few questions really
13 starting on page 8 of your rebuttal testimony. If
14 you're there, I'll begin.

15 A I am.

16 Q Thank you. Looking on line 15 you say that
17 CenturyLink has been investing in broadband-capable
18 infrastructure, and I'll stop there and ask you what
19 do you mean there by broadband-capable
20 infrastructure?

21 A It can mean a host of things. Enabling broadband
22 and particular access nodes, building out loops to
23 customers, maybe enhancing the interconnection
24 between the central office and the node. To any of
25 the higher speeds, not just voice service.