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BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION
DOCKET CONTROL

2016 MAR 15 PM 4:08

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- 7 **ANDY TOBIN**
Commissioner
- 8

Arizona Corporation Commission
DOCKETED

MAR 15 2016

DOCKETED BY

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

- DOCKET NO. T-01051B-10-0194
- DOCKET NO. T-02811B-10-0194
- DOCKET NO. T-04190A-10-0194
- DOCKET NO. T-20443A-10-0194
- DOCKET NO. T-03555A-10-0194
- DOCKET NO. T-03902A-10-0194

NOTICE OF FILING
COMPLIANCE TO SETTLEMENT
AGREEMENT CONDITION NO. 19

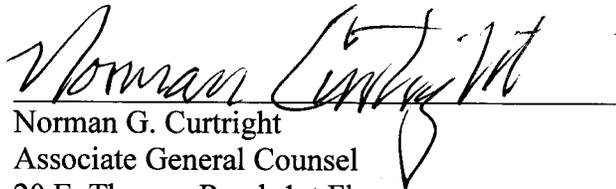
16
17 On January 7, 2016, CenturyLink provided notice of its plans to consolidate its Local Service
18 Ordering and Billing systems across CenturyLink's markets. This notice was provided in compliance
19 with Condition No. 19 of the Settlement Agreement among and between the Joint Applicants, the
20 Commission Staff, and the Residential Utilities Consumer Office, approved and ordered by the Arizona
21 Corporation Commission in Decision No. 72232. The details of the planned system consolidation were
22 outlined in a letter to Thomas Broderick dated January 7th, 2016.

23 CenturyLink notified all wholesale customers who would be affected by this effort and utilized
24 the Change Management Process (CMP) to allow those carriers an opportunity to review the details of
25

1 the plan and to provide comments and input. As a result of this process, CenturyLink received input
2 from CLECs which resulted in modifications to the original plan. Those modifications are reflected in
3 the attached revised plan provided to Mr. Thomas Broderick in a letter dated March 15, 2016.

4
5 RESPECTFULLY SUBMITTED, this 15th, day of March, 2016.

6 QWEST CORPORATION d/b/a
7 CENTURYLINK-QC

8 
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14 ORIGINAL and thirteen (13) copies filed
15 this 15th, day of March, 2016, with:

16 Docket Control
17 ARIZONA CORPORATION COMMISSION
18 1200 West Washington Street
19 Phoenix, Arizona 85007

20 COPY of the foregoing hand-delivered
21 this 15th, day of March, 2016, to:

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March 15, 2016

Mr. Thomas M. Broderick
Director – Utilities Division
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, Arizona 85007

RE: CenturyLink-Qwest Merger
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
Merger Condition No. 19
Proposed System Consolidation

Dear Mr. Broderick:

As described in my letter to you dated January 7, 2016, CenturyLink is consolidating its Local Service ordering and billing systems to streamline processes and systems across CenturyLink's markets.

On January 4, 2016, CenturyLink filed a detailed "CenturyLink Local Service Ordering and Billing System Consolidation Plan" (Plan) pursuant to the provisions of the Change Management Process (CMP) detailed in CenturyLink's Interconnection Agreements as well as merger related settlement agreements. That notice afforded CLECs an opportunity to review the plan and provide comments. As a result of this process, CenturyLink has received input from CLECs resulting in changes to the original plan document provided to you in my January 7th correspondence. Those changes are reflected in the attached updated Plan, with the specific changes highlighted in yellow for ease of identification.

As mentioned in my prior letter to you, this notice is being provided to the Commission pursuant to the conditions of the Merger Agreement between CenturyLink and Qwest as contained in Decision No. 72232. There is no specific requirement of the Commission regarding this change and no action is being requested at this time.

Mr. Thomas M. Broderick
March 15, 2016
Page 2

Please contact me if you have any questions or wish to discuss this matter.

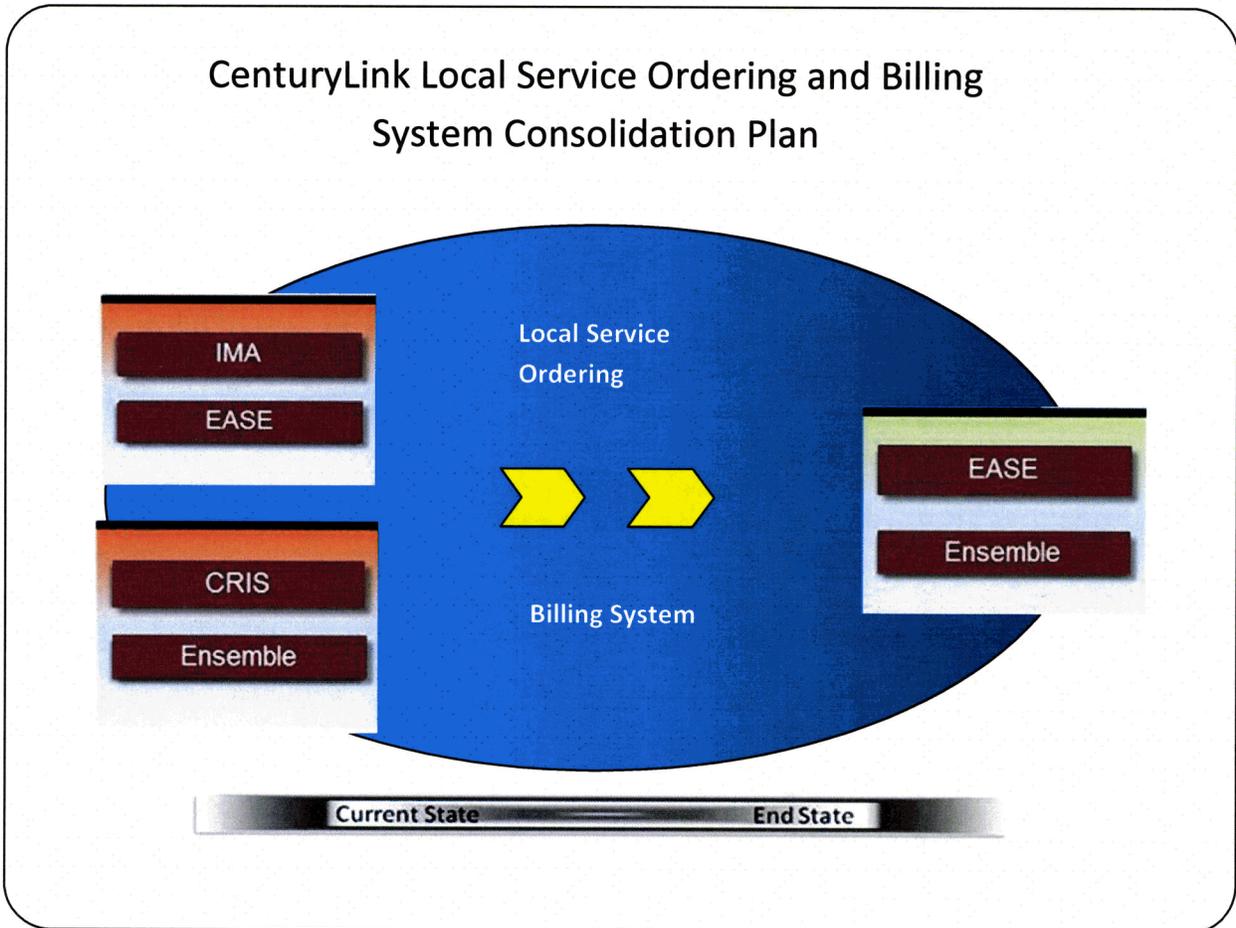
Sincerely,

A handwritten signature in cursive script, appearing to read "Brian Bozzo".

Attachment

Cc: Docket Control
Brian Bozzo – Compliance and Enforcement

CenturyLink Local Service Ordering and Billing System Consolidation Plan



Document Modification Log

All revisions to this document are in chronological order.

Version	Date	Description of Change
1	1/4/2016	Initial Version of Plan with Eastern Consolidation dates specified
2	3/7/2016	Contains minor changes (highlighted in yellow) requested during January 27, 2016 document review session and in response to customer comments. Updates were made to consistently refer to "Local Service Request" throughout the Plan.

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1 Executive Summary

CenturyLink is consolidating Local Service ordering and billing systems to streamline processes and systems across CenturyLink's markets (hereafter, Consolidation). Due to Acquisitions (see Section 1.3), CenturyLink currently operates two different ordering and billing systems for Local Services. As a result, customers that are in multiple locations within CenturyLink's network could be using both systems making this inefficient for the customer and for CenturyLink.

During consolidation, CenturyLink will move all Local Service Request ordering to Electronic Administration & Service Order Exchange (EASE) and the associated billing to Ensemble. (Refer to Section: 2: Ordering and Billing System Description for more information.) This consolidation will move properties off the Interconnect Mediated Access (IMA) and Customer Records Information System (CRIS).

The benefits to the wholesale customers and CenturyLink of consolidating the ordering systems across all CenturyLink Markets are to provide:

- Single standardized order entry channel for Local Service Request services
- Standardized process for Local Service Request handling
- Single view of all Local Service Requests
- One set of training requirements

The benefits to the wholesale customers and CenturyLink of consolidating the billing systems across all CenturyLink Markets are to provide:

- Single process for Local Service Request billing functions
- Consistent billing levels – i.e. grouping of accounts across states
- Consistent method to view the billing for any products and services ordered on an Local Service Request
- Consistent bill format for all local billing

To reduce the risks associated with a conversion, the conversion will be implemented in three phases, one CRIS region at a time.

1.1 Scope

The CenturyLink Local Service Ordering and Billing System Consolidation Plan (hereafter; the Consolidation Plan) document provides CenturyLink's wholesale customers, (hereafter; Customers) with further information about the Consolidation and how they will be affected.

The purpose of this document is to cover the scope of the Consolidation Plan to fulfill specific requirements of settlement agreements with various parties, as well as associated state commission and FCC orders, related to the CenturyLink/Qwest merger (hereafter, Merger Requirements). This document summarizes the critical milestones that will occur when CenturyLink consolidates

the Current State Ordering and Billing Systems into the End State solution. The Consolidation is planned for no earlier than December 2016.

1.1.1 Items Not in Scope:

Items that are not in-scope for this project include, but are not limited to:

- Future system enhancements to EASE resulting from Local Service Ordering Guidelines (LSOG) updates beyond the upgrades specified in this project
- Access Service Request (ASR) processing

1.2 Assumptions

The following is a list of assumptions that are applicable during implementation and upon completion of the Consolidation:

- CenturyLink will comply with all applicable Merger Requirements
- CenturyLink will utilize the existing Qwest Corporation d/b/a CenturyLink Change Management Process (CMP) to communicate system and product/process changes in the appropriate timing and format. CenturyLink will fully utilize CMP post Consolidation. To view the complete CMP document, visit the [CMP Website](#) or click on the [Wholesale Change Management Process Document](#) link
- The CMP timeline will be adjusted consistent with Merger Requirements
- Customers will enter Local Service Requests in EASE and receive their bill output from Ensemble
- Customers will submit Local Service Requests in LSOG (Issue 2Q14 Dated June 30, 2014) standard format and in 2nd version of XML format
- Completed IMA Local Service Requests will continue to be available on-line for 24 months from the Consolidation date for inquiry
- CenturyLink will communicate billing account number changes to Customers before the Consolidation
- Historical data for Bill/CSRs will be available for duplicate bill requests for 13 months
- CenturyLink will retain existing output choices for billing media (i.e., paper vs. electronic) at consolidation
- Customers will not have to resend any In-Flight Local Service Requests

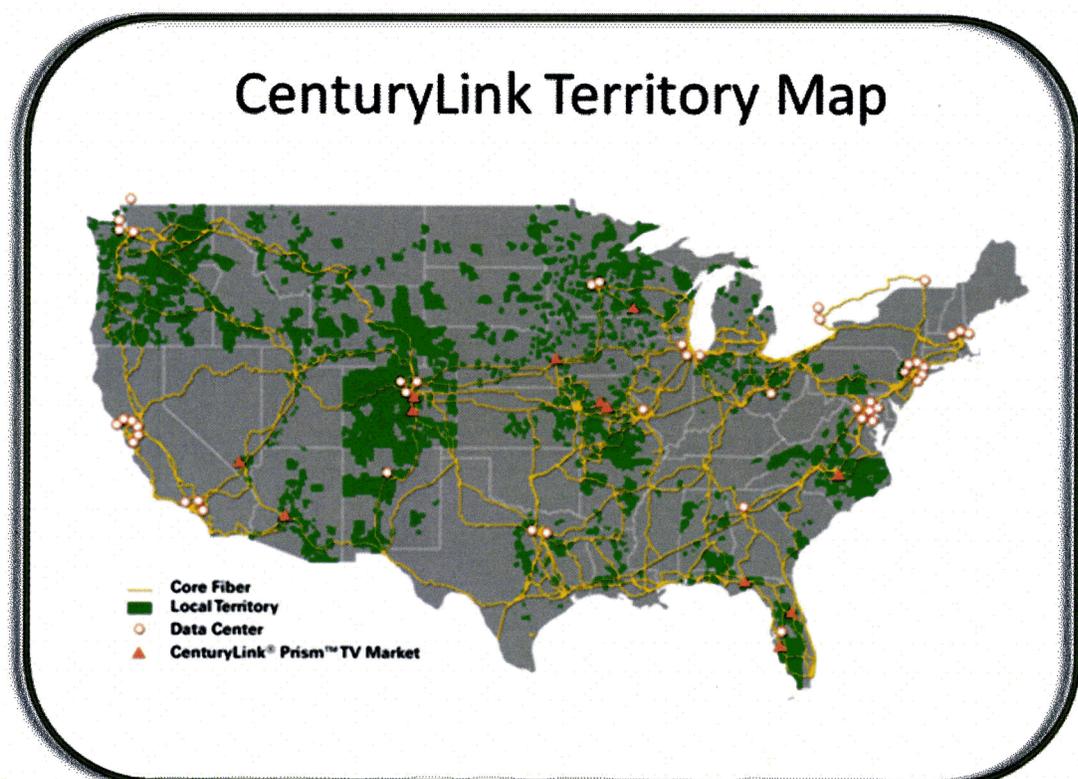
In-Flight Local Service Requests are:

When Customers submit Local Service Requests and CenturyLink acknowledges acceptance, but the processing of the Local Service Requests are not complete before the Consolidation weekend.

- The LSR Consolidation will support the regulatory requirements for PID/PAP reporting. Data sourced in the retiring applications will be replaced with data from the newly introduced applications.
- As the project progresses, analysis and design activities may result in modifications to the consolidation plan.

1.3 Historical Background

Strategic acquisitions are the primary contributor to CenturyLink's rapid growth. Pacific Telecom, Embarq, and Qwest are a just few of the companies acquired in recent years. CenturyLink also purchased a large number of access lines from GTE in 2000 and Verizon in 2002.



After the acquisition of Embarq in 2009, CenturyLink consolidated the Embarq Service Order Entry (SOE), Customer Records and Billing (CRB) to Ensemble. Embarq used the EASE Service Ordering System before acquisition. CenturyLink adopted Embarq's EASE Service Ordering System ordering into its Local Service Ordering system flow, replacing EZLocal for use in all of its markets at that time.

2 Ordering and Billing System Description

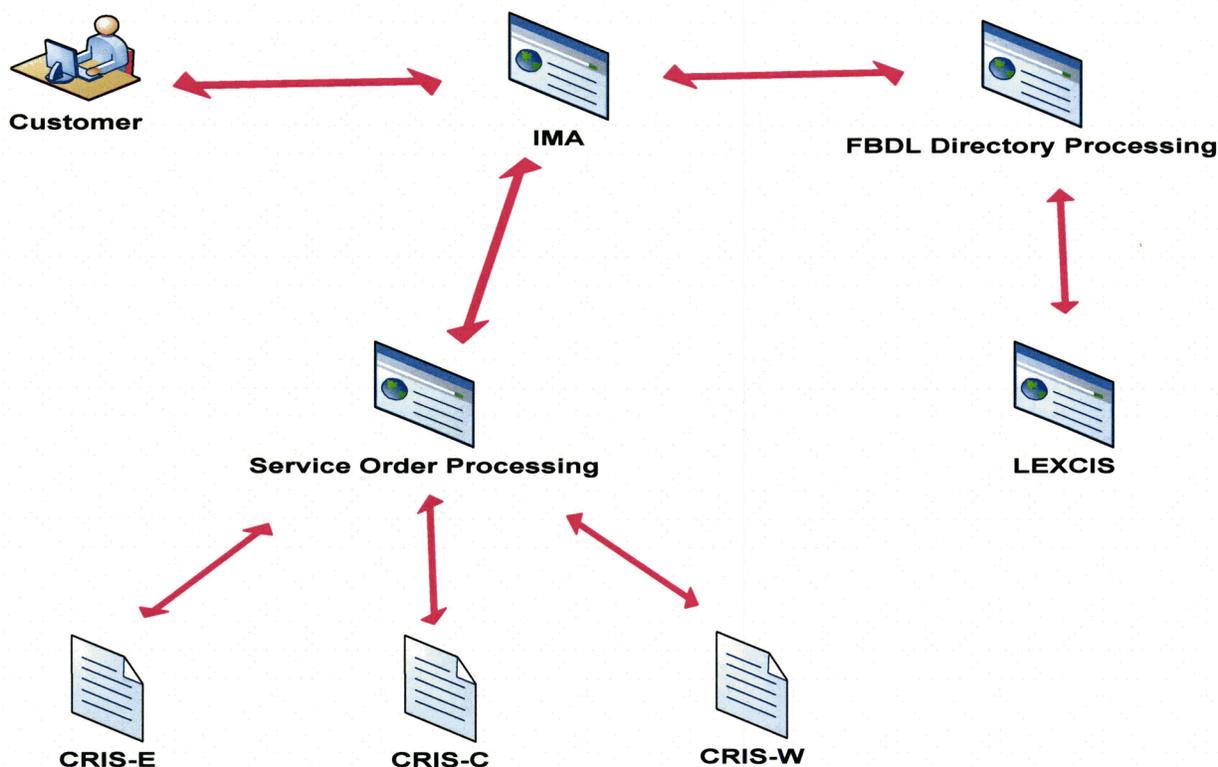
This section provides Customers with Current State and End State Ordering and Billing system views, common features, and information about the differences between Current State and End State systems. It also provides information about

the functionality and applications that CenturyLink uses to facilitate Customer and system interfaces.

2.1 Current State System View

CenturyLink currently uses two separate Local Service Request Ordering and Billing Systems. CenturyLink uses both EASE and IMA for Local Service Request Ordering. CenturyLink uses Ensemble for billing. The diagram below depicts the current state system view for IMA Ordering and CRIS Billing.

Current State System View



2.1.1 CLEC ordering portal

IMA is the current Local Service Request application supporting Local Service Requests for wholesale customers in the Legacy Qwest markets of CenturyLink. IMA includes a GUI application for direct order entry of Local Service Requests and pre-order inquiries and the viewing of statuses and notifications. IMA also provides an electronic bonding gateway using XML to support system-to-system integration.

2.1.2 Service Delivery

IMA interfaces to an application called FTS, which constructs an order in one of three regionalized core-ordering applications, called Service Order Processors (SOPs). The SOPs create the Universal Service Order, used by the Telcordia suite of provisioning systems to establish service.

2.1.3 Billing

The Service Order (S.O.) is transmitted from the Service Order Processor to the 3 CRIS regions for billing today.

2.1.4 Facility Based Directory Listing (FBDL)

Directory Listings are sent from IMA to the Qwest Directory Builder application, which creates and stores the directory listing based on Local Service Request Directory requests.

Directory Listings are billed in the LEXCIS billing system.

2.1.5 Nationwide Customer Ordering & Billing

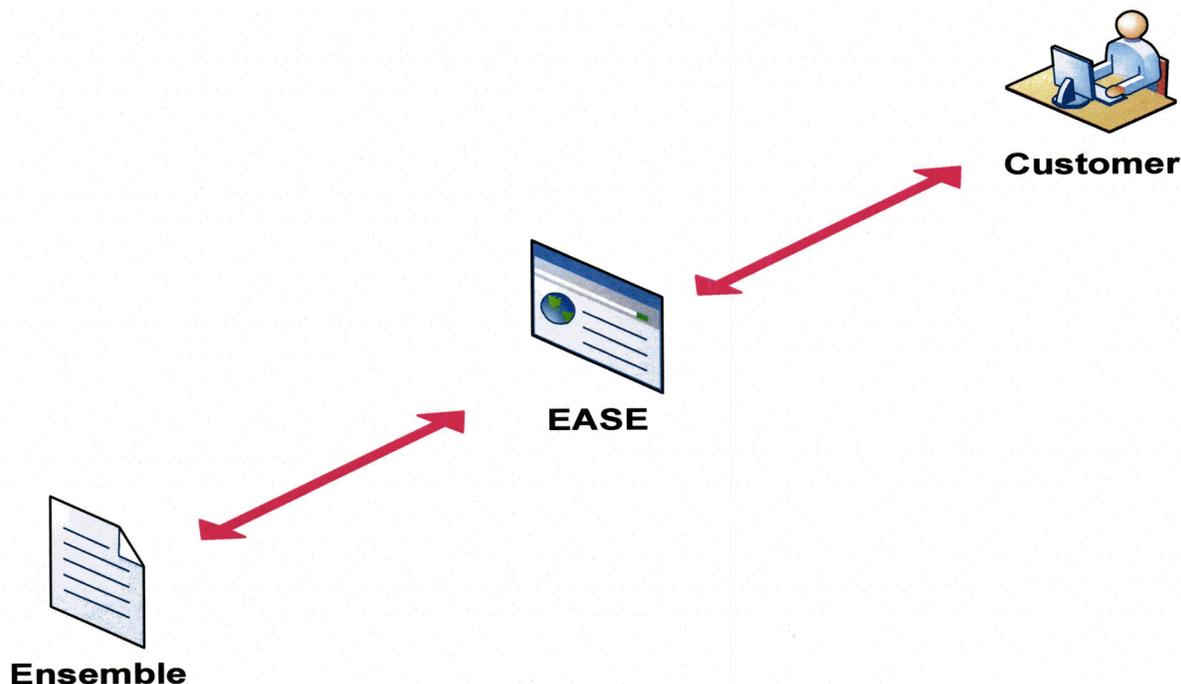
Century Link currently requires, based on end user location, the use of two different systems to deliver Local Service Requests from wholesale customers, EASE and IMA. Multiple billing platforms are also used with different media and invoice formats.

The graphic above illustrates the wholesale process and billing local service today.

2.2 End State System View

2.2.1 Transition to common processes and system infrastructure

The following diagram depicts the End State Ordering and Billing System for all CenturyLink Markets.



2.2.2 EASE

EASE is the end state Local Service Request ordering application to be used by Customers, as well as CenturyLink, allowing Local Service Request processing via a GUI and batch files, and real-time XML transactions.

Included within EASE are:

- Edits
- Validations
- Pre-order information queries
- Status information

2.2.3 Ensemble

Ensemble is the end state system that creates the core service order and bills customers for services ordered through Local Service Requests. Ensemble is integrated directly with EASE via an API. The core Ensemble service originates both the service delivery and billing processes. Ensemble also supports the directory listing fulfillment and billing processes.

Ensemble is the billing system application that is used to set up new customer services, facilitate billing services, provision some products and services, view customer information and many other customer-related services.

2.3 Local Service Ordering End State System - EASE

CenturyLink Customers use the Synchronoss based EASE system for Local Service Request Ordering. Synchronoss, founded in 2000, specializes in software and services for Wireline and Wireless Telecommunications Carriers. Headquartered in Bridgewater, NJ, Synchronoss is a publicly traded company (NASDAQ: SNCR) with annual revenue for the fiscal year 2014 of approximately \$457M.

Synchronoss acquired the technology and assets that support the EASE platform as part of its overall acquisition of Wisor Telecom OSS in 2008. Since then, Synchronoss has continued to maintain, enhance, and market the platform supporting EASE.

EASE is an industry compliant order entry and workforce management system that allows end-to-end view and management of the Local Service Requests. The system consists of GUI and UOM/XML ordering capabilities. The system is robust and table driven with extensive business rule capabilities.

EASE follows industry-standard ordering business rules, including the twice-annual LSOG industry updates. EASE provides the following:

- Single, centralized platform for all Local Service Request processing
 - Supports both eBonding and Portal (Virtual Front Office (VFO) GUI) capabilities
- Proven carrier-grade solution
 - Solutions are used by major carriers across the US and beyond, including major Incumbent Local Exchange Carriers (ILECs) and Competitive Local Exchange Carriers (CLECs)
 - Extensive features and functions for validation, delivery, and integration
- Compliance with LSOG/Local Service Request industry standards and standard Local Service Request configurations
 - Manages all LSOG updates going forward
- Integration with back office systems
 - Platform Application Programming Interface (API) will support additional integrations as needed for all Local Service Request volumes.
- Platform Expandability
 - Local Number Portability (LNP) / Local Service Request (Local Service Request) / Receive custom transaction types

2.3.1 Service Ordering Comparison – IMA to EASE (LSOG 2Q14)

The following matrices provide a comparison of current IMA functionality and EASE Local Service Request functionality that will be available in user acceptance testing and deployed prior to conversion including planned development.

General Functionality	IMA	EASE
Support eBonding and portal for Local Service Request requests	Yes	Yes
LSOG Ver 2Q14 Compliant	No	Yes*
Auto-populate initiator information from User Profile	Yes	Yes*
Field Level Help	Yes	Yes*
Error messaging – identifies form and fields	Yes	Yes*
Auto navigation to fields in error	No	Yes
Recapping from pre-order to Local Service Request	Yes	Yes*
Multiple versions of XML	Yes	Yes*
Manage Users	Yes	Yes
Agent owner relationships	Yes	Yes

2.3.1.1 Pre-Ordering

Pre-Order Functionality	IMA	EASE
Address Validation (by Street Address or TN)	Yes	Yes*
Appointment Scheduler Query (Select, Change, or Cancel)	Yes	Yes*
Carrier Facility Assignment Validation (Cable Facility, CFA Groups or Units queries)	Yes	Yes*
Customer Service Inquiry & Virtual Customer Service Inquiry Retrieval (by Street Address or TN)	Yes	Yes*
Directory Listing Inquiry (by Account TN, Listed TN, Non-Standard TN, Caption Name, or SLU Header TN)	Yes	Yes*
Design Layout Record Query (by Serial Number Circuit, TN Circuit, Carriers Facility Circuit, or Message Trunk Circuit)	Yes	Yes*
Facility Availability Validation (by TN, Address, or Circuit)	Yes	Yes*
Loop Qualification Query (by TN or Circuit)	Yes	Yes*
Meet Point Query (POTS Splitter or Cable Connection queries)	Yes	Yes*
Raw Loop Data Query (by TN, Address, or Circuit)	Yes	Yes*
Service Availability Query (by State and Service Type)	Yes	Yes*
TN Reservation Query (by Address and Custom TN selection criteria)	Yes	Yes*

*Indicates some development may be required prior to CLEC testing

2.3.1.2 Ordering

Order Functionality	IMA	EASE
Create and submit a request	Yes	Yes*
Revise and resubmit a rejected request	Yes	Yes
Supplement a request	Yes	Yes
Up front order editing	Yes	Yes
Search Local Service Requests	Yes	Yes
Wildcard search	Yes	Yes
Local Service Request replication and template creation	Yes	Yes

2.3.1.3 Post Ordering

Post Order Functionality	IMA	EASE
Viewing and retrieving line loss information (by Account Number, Working TN, Circuit, Order number, PON, or Completion Date)	Yes	Yes
Status by Local Service Request and/or Service Orders		
Error	Yes	Yes
Issued FOC	Yes	Yes
Jeopardy (Local Service Request)	Yes	Yes
Jeopardy (Internal Service Order)	Yes	Yes*
Order Completed	Yes	Yes*
Physical Work Completed	Yes	Yes
Posted to be billed	Yes	Yes*
Rejected	Yes	Yes*
Request Completed	Yes	Yes*
Notification Inquiries		
BCN	Yes	Yes*
Bulk	Yes	Yes*
Completion	Yes	Yes*
Confirmation	Yes	Yes*
Error	Yes	Yes*
Jeopardy	Yes	Yes*
PSON	Yes	Yes*
Reject	Yes	Yes*
CFA Inventory	Yes	Yes*
Query for technician status and trouble ticket status	Yes	Yes*

*Indicates some development may be required prior to CLEC testing

Note: Technical, legal and regulatory changes may affect information provided in the above table. Changes made following the introduction of this document in CMP are not reflected in the table above. **This section is not intended to provide a complete listing of all capabilities.**

Follow the link to access LSOG: <http://www.atis.org/obf/download.asp>

2.4 Billing End State System

CenturyLink uses Ensemble to bill services ordered through a Local Service Request.

Ensemble was developed by AMDOCS. AMDOCS is an industry leading billing and OSS platform provider. Many telecom providers, including AT&T, Sprint, T-Mobile and Bell Canada, use their software. AMDOCS has been in business for over 30 years and specializes in Software and Services for communications, media and entertainment industry service providers worldwide. They are particularly well known for their revenue management products.

AMDOCS is a publicly traded company (NASDAQ: DOX) with annual revenue for the fiscal year 2014 of approximately \$3.563B.

The Ensemble application is a full service ordering and billing suite currently supporting the legacy CenturyLink retail and wholesale customer base. The Ensemble application is fully integrated into legacy CenturyLink's accounting, regulatory reporting and service delivery platforms.

2.4.1 Billing System Comparison Functionality – CRIS to Ensemble

2.4.1.1 Bill Format

Ensemble uses Price Plans and Feature codes for billing where CRIS uses USOCs (Universal Service Order Codes). The bill provides a Current Charges Summary section that lists Monthly, One-time and Usage charges. Where applicable, Department totals and a Department Summary by sub-department is presented. The Charge Detail section identifies charges (monthly and one-time charges) by Product-ID. Local Usage detail is provided when applicable. Lastly, an account summary page is presented.

The following table shows key capabilities of the System.

CRIS to Ensemble Billing System Integration	
Key Capabilities	Description
Online Bill View	<p>CenturyLink will provide the Customer with an external link for up to 13 months of bill invoices. The Customer will be able to sign up for this access. This history will be built going forward after Consolidation.</p> <p>The current tool is My Account and will be moving to Control Center.</p>
Media Options	<p>Ensemble provides multiple options for receiving bills. Options include paper, online bill viewing, and EDI standard files.</p>
Invoices	<p>CenturyLink will continue to provide industry compliant invoices. Refer to separate attachment for Appendix A: Ensemble Invoice & CSR Examples.</p>

Note: Technical, legal and regulatory changes may affect information provided in the above table. The table above does not reflect changes made following the introduction of this document in CMP.

2.4.2 Billing System Differences between CRIS to Ensemble

2.4.2.1 BANS

Ensemble uses a nine digit account number (i.e. 123456789), whereas CRIS uses a TN number format for the Billing Account Number (BAN). CenturyLink will provide the BAN conversion information prior to consolidation.

2.4.2.2 Bill Summary

Account, department, and sub-department summaries are available in the bill.

2.4.2.3 RSID/ZCID

Values from CRIS will be carried over to Ensemble.

Note: Technical Specifications will explain any electronic billing file differences, if applicable.

3 Consolidation Plan Implementation

The Consolidation Plan provides a framework for informing all participants about the Consolidation.

3.1 Consolidation Plan Schedule and Milestones

3.1.1 Conversion Approach

The overall conversion will be accomplished in phases, corresponding to the three regional CRIS systems:

- Eastern (IA, MN, NE, ND, SD)
- Western (OR, WA)
- Central (AZ, CO, ID, MT, NM, UT, WY)

3.1.2 Schedule and Milestones

Consolidation completion for the Eastern region is 12/5/2016. Tentative target for the Western region is 2Q17 and Central region is 4Q17. CenturyLink will comply with all applicable Merger Requirements, including use of the CMP process. This document will be updated when target dates are available for the additional two phases.

The following table shows a list of milestones that impact the Consolidation Plan. CenturyLink will communicate updated milestone dates per the CMP process.

 = A milestone, established by the Merger Requirements, that alters the established CMP milestones schedule.

Consolidation Plan Milestone	Date
CMP CR Issuance: SCR110415-1, SCR110415-2, SCR110415-3, SCR110415-4 These can be found at: http://www.centurylink.com/wholesale/cmp/cr/crnumber_system_index.html	11/4/15
CR Presentation at CMP Meeting	11/18/15
Local Service Request Consolidation Plan due	1/4/16
Initial Release Notification (for SCR110415-1 and SCR110415-2)	1/4/16
Initial Retirement Notice (for SCR110415-3 and SCR110415-4)	1/4/16
Local Service Request Consolidation Plan Review Meeting	1/27/16
Extended Customer Comment Window for Initial Release Notification, Initial Retirement Notice and Consolidation Plan	2/11/16
CenturyLink issues response to CLEC comments and Final Retirement Notice, including the Final version of the Local Service Request Consolidation Plan	3/7/16

Consolidation Plan Milestone	Date
3 rd Party Facilitator Selected	3/4/16
Draft Interface Tech Specs	4/8/16
Tech Specs Walk-through	4/19/16
CLEC Comments for Interface Tech Specs	4/25/16
Final Interface Tech Specs	4/29/16
L&P Volume Testing	6/6/16
(New) GUI Initial Release notice	6/23/16
(New) GUI Draft Release notes	7/8/16
Product Process Notification associated with Level 2 OSS changes	7/8/16
CLEC comments due on (New) GUI Release Notes	7/11/16
CLEC comments due on Level 2 OSS Product Process changes	7/15/16
Training available	7/15/16
GUI Final Release Notice	7/15/16
Final Notice For Level 2 OSS Product/Process Changes	7/22/16
Customer Testing Begins with Local Service Request Consolidation Functionality (120 Days)	7/29/16
Customer Testing Ends	11/28/16
Customer Go/No Go Vote	12/1/16
Eastern Region Release to Production	12/5/16

3.2 3rd Party Facilitator

In accordance with the Merger Requirements, CenturyLink will contract with a 3rd Party Facilitator to coordinate between companies during planning and execution of Customer Testing. Refer to Section 3.3.3: Customer Testing.

The 3rd Party Facilitator will be engaged in 1Q2016. The CLECS will have the opportunity for input on the 3rd Party Facilitator requirements. The Facilitator will assist in Customer Testing scenario development and be available during the 120-day Customer Testing period which begins in 3Q2016.¹

3.3 Consolidation Plan Implementation

This section provides further details on the Consolidation Plan implementation, including testing, training, the conversion weekend consolidation plan, and contingency planning.

¹ See *In the Matter of the Joint Petition for Approval of Indirect Transfer of Control of Qwest Operating Companies to CenturyLink, Minnesota Public Utilities Commission, Docket No. p-421, et al./PA-10-456, Settlement Agreement between the Joint Petitioners and Joint CLECs, March 4, 2011.*

3.3.1 Internal CenturyLink Consolidation Testing

CenturyLink will execute test Local Service Requests through EASE to ensure that proper billing codes assignment occurs and the Local Service Requests flow successfully into Ensemble for billing. CenturyLink business SMEs (Subject Matter Experts) will check for accuracy and completeness.

The following is the standard process that CenturyLink has used for previous consolidations and will use for this system consolidation:

- First, internal testing consisting of 'mock' conversions from CRIS into Ensemble prior to the Customer testing period will be iteratively executed.
- Test bills will be generated and compared to production Ensemble bills for accuracy.

Automated comparisons will occur for all circuits/products that are on the account, all monthly recurring charges, taxes, and any in-flight activity such as pending payments, one time charges and disputes. CenturyLink resources will investigate fallout and issues during the comparison process and update the processes/programs to achieve billing accuracy.

CenturyLink SMEs from EASE/IMA and CRIS/Ensemble systems and process areas will participate in testing and validation efforts. In addition, contract resources will supplement these internal resources to ensure intense focus on Consolidation activity and to allow 24-hour cycles.

3.3.2 Training and Process Plan

Per the Merger Agreement, CenturyLink will provide Customer training and education without charge.

For the Consolidation, CenturyLink will provide the following:

- CenturyLink will provide updated EASE Customer training
- CenturyLink will conduct a Customer walk through session prior to the start of Customer testing
- An additional Customer walk-through of the training will be conducted before Consolidation
- CenturyLink will provide updated external documentation prior to the beginning of the Customer testing phase

3.3.3 Customer Testing

In accordance with the Merger Agreement, CenturyLink will make available a testing environment at the appropriate time for the Customers to test Local Service Requests into the EASE ordering system. A testing schedule will allow the generation of test bills and CSRs at scheduled intervals during the 120-day testing window. Before testing begins, the process to log and track defects will be communicated.

3.3.4 Load & Performance (L&P) Testing

CenturyLink completed an analysis of the increased demand on EASE to process IMA transactions. To meet the needs of the expected volume from this analysis, EASE processing capability was increased. CenturyLink modifies

processing capacity by using internal virtual server environments allowing CenturyLink to respond quickly to capacity issues.

In addition to the completed performance analysis, CenturyLink will perform a Load & Performance test on EASE based on the anticipated needs after the IMA volume is included. Specifically:

- The Load & Performance test will be conducted prior to Consolidation, but no later than end of 3Q2016
- The combined Local Service Request transaction volume for the preceding 36 months will be made available to Customers
- The highest monthly volume of aggregate transactions for the preceding 12 months will serve as the testing baseline
- Using the highest monthly volume, a single day's average transaction volume of Local Service Requests will be calculated
- 125% of the single day's transaction volume will be processed and performance metrics captured
- These metrics will be available to Customers

3.3.5 Production Conversion Plan

The overall Consolidation from ordering through billing will be implemented in three phases: Eastern, the weekend of December 2, 2016, and two more conversions for Central and Western regions in 2017. These conversions will be flash cuts of the IMA and CRIS applications that are in use for that region prior to the conversion. The EASE Local Service Request and Ensemble applications will then be in use for that region post-conversion. This means that Customers will submit Local Service Requests via IMA pre-Consolidation weekend and new Local Service Requests post-Consolidation will go into EASE. The weekend Consolidation cutover will be for all properties in the impacted regions. The Consolidation weekends will be scheduled near the end of a month following the completion of all billing cycles for that month, and before any billing cycles executed in the following month.

Customers' will receive notifications of the Consolidation's extended weekend maintenance window. There will be a live bridge open at CenturyLink with key CenturyLink resources that will be available to immediately investigate and address any concerns once the production systems are back online. Customers will receive issue ticket logging and escalations processes prior to the Consolidation weekend. At Consolidation, all existing products billed in CRIS will convert and all new bills will be generated from Ensemble for the impacted region.

3.3.6 Post Conversion Support

Post conversion support staff will be available to assist key operational functions including ordering centers, care functions, provisioning operation centers and billing teams with any post-conversion issues. The support team will include program, IT and functional SMEs. Internal status meetings will be conducted regularly to monitor progress. Customers will be supported by their normal operations centers. CenturyLink will ensure its staffing and training plans will accommodate post conversion support needs.

3.3.7 Contingency Plan

A backup of all relevant source and target databases will occur at the beginning of the extended maintenance window immediately as part of conversion. Once these backups complete successfully, consolidation activities will begin. The Ensemble database will contain CRIS products, in-flight Local Service Requests will be contained in the end state databases and internal validation will occur.

In the event of catastrophic issues with the production system during consolidation weekend, the original databases' pre-consolidation state restoration would occur through a predefined back-out plan. The implementation of this plan would only occur in the event of catastrophic issues with the production system during that weekend. In the unlikely event this back-out plan is required, the decision would be made in time to have the systems available on the Monday following consolidation weekend.

Once the consolidation is complete and validated, source databases will be modified to 'read only' to allow view capability where applicable.

Appendix A: Ensemble Invoice & CSR Examples (Redacted)

CRIS Redacted Resale Bill:



CRIS BILL.docx

Ensemble Redacted Resale Bill:



ENSEMBLE BILL.docx

Appendix B: Regulatory Organizations, Guidelines and Standards

The following is a list of regulatory organizations, guidelines and industry standards mentioned in this document.

- LSOG (Local Service Ordering Guidelines)
 - <http://www.atis.org/obf/download.asp>
- CMP (CenturyLink Change Management Process)
 - <http://www.centurylink.com/wholesale/cmp/review.html>
- FCC (Federal Communications Commission)
 - www.fcc.gov/
- PUC (Public Utility Commissions)
 - The following link is to the National Association of Regulatory Utility Commissioners. You will be able to obtain information about Public Utilities Commissions by State
<http://www.naruc.org/Commissions/>

Appendix C: Glossary

The glossary lists terms and acronyms used in this document with descriptions and definitions.

Term/Acronym	Description/Definition
API	Application Programming Interface
BAN	Billing Account Number
CFA	Carrier Facility Assignment
CLEC	Competitive Local Exchange Carrier
CMP	Change Management Process
CRB	Customer Records and Billing
CRIS	Customer Records and Information System
CSR	Customer Service Records
Current State System View	Denotes CenturyLink's existing systems and their functionality pre-Consolidation
EASE	Electronic Administration & Service Order Exchange
End State System View	Denotes CenturyLink's systems and functionality post Consolidation
FBDL	Facility Based Directory Listing
FCC	Federal Communications Commission (USA)
GUI	Graphical User Interface
ILEC	Incumbent Local Exchange Carrier
IMA	Interconnect Mediated Access
LEC	Local Exchange Carrier
LEXCIS	Local Exchange Carrier Invoice System
LNP	Local Number Portability
LSOG	Local Service Ordering Guidelines
LSR	Local Service Request
NC	Network Channel
NCI	Network Channel Interface
OSS	Operating Service System
PUC	Public Utility Commissions
RLEC	Rural Local Exchange Carrier
S.O.	Service Order
SOE	Service Order Entry
UOM	Uniform Ordering Model

USOC	Universal Service Order Code
VFO	Virtual Front Office
WTN	Working Telephone Number
XML	eXtensible Markup Language

Appendix D: Document Authors

The table below lists the qualifications of the document authors including information technology professionals with substantial experience and knowledge regarding CenturyLink systems, process, and requirements.

Title	Years of Telco Experience	Service in CenturyLink	Service in Qwest	Role in Preparation of Consolidation Plan
Director Access Billing	17	17	0	Access Billing
Director IT Conversion	20	20	0	IT Conversion and Architecture
Director Wholesale Ordering, Enterprise eBilling & CPE Development	26	4	13.5	Director Wholesale Ordering, Enterprise eBilling & CPE Development
Director of Wholesale Support	32	32	0	Reviewer to ensure compliance with merger commitments
Director Wholesale Technical Support	25	4	21	OSS & Technical Support
Lead Process Analyst	30	4	26	Change Management Process, Lead Process Analyst
Lead Witness	16	4	12	Qwest Merger Commitments SME
Manager Credit Management	35	4	31	Qwest Billing Process SME
Manager Program / Project Management - Ordering	26	26	0	Manager Program / Project Management - Ordering
Manager Program / Project Management - Wholesale	21	4	17	Manager Program / Project Management - Wholesale
Sr. Lead Analyst	33	4	29	Qwest Change Management Process, Sr. Lead Analyst
Sr. Lead Process Analyst	35	4	31	Qwest Billing Process
Sr. Lead Project Manager	15	4	11	Overall Project Manager for completion of the Consolidation Plan