

BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS  
600 North Robert Street  
St. Paul, Minnesota 55101

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION  
121 Seventh Place East Suite 350  
St. Paul, Minnesota 55101-2147

In the Matter of the Joint Petition for Approval of Indirect Transfer of Control of Qwest Operating Companies to CenturyLink      MPUC Docket No. P-421, et al./PA-10-456  
OAH Docket No. 11-2500-21391-2

**INTEGRA'S RESPONSES TO MCLEODUSA  
TELECOMMUNICATIONS SERVICES, INC.  
D/B/A PAETEC BUSINESS SERVICES INFORMATION  
REQUEST NOS. 1-4**

Integra Telecom ("Integra"), for its Responses to MCLeodUSA Telecommunications Services, Inc. d/b/a PAETEC Business Services' Information Request Nos. 1-4 in the above-captioned matter, states as follows:

**GENERAL OBJECTIONS TO ALL DATA REQUESTS (ONGOING)**

1. Integra objects to the Requests to the extent they are vague, over-broad and/or unduly burdensome.
2. Integra objects to the Requests to the extent they seek information subject to the attorney-client privilege, work product doctrine, or any other privilege recognized by the State of Minnesota.
3. Integra objects to the Requests to the extent that they seek information that is trade secret, confidential, sensitive, competitive in nature or proprietary. Any trade secret or other confidential information produced in responses to these requests will be produced pursuant to the protective order that governs this proceeding.
4. Integra objects to the Requests to the extent that they seek information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Integra provides the following responses:

INFORMATION REQUEST

MPUC Docket No. P-421, et al./PA-10-456  
OAH Docket No. 11-2500-21391-2

Information Requested By: Dan Lipschultz  
MOSS & BARNETT  
4800 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

Information Requested From: Integra Telecom, Inc.

Date Requested: November 10, 2010  
Date Response Due: November 22, 2010

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Request No. 1:

- a. Does Integra use Qwest's Electronic Bonded Trouble Administration ("EBTA") OSS for trouble ticket administration?
- b. When Integra uses software to remotely test a trouble condition on a DS I or T1 circuit to the smart jack, does an Integra back office system use that test result to electronically generate a trouble ticket and submit the trouble ticket to Qwest e-bonding without any manual input of data by an Integra employee?
- c. If the answer to (b) is "no," does Integra personnel manually key in trouble tickets to a system before submitting to Qwest?

Response:

- a. No.
- b. No.
- c. Yes.

Response By: Bonnie Johnson  
Title: Director, Carrier Relations  
Department: Integra Telecom – Law & Policy  
Telephone: 763-745-8464

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Request No. 2:

- a. When an Integra customer served by a UNE loop (POTs or TI) changes to become a Qwest customer, does Integra receive an electronic line loss notification from Qwest?
- b. Does an Integra system take the line loss notification provided by Qwest's OSS and direct that information into the Integra billing system to cut off an end user billing without any manual input by an Integra employee?

Response:

- a. No.
- b. No.

Response By: Bonnie Johnson  
Title: Director, Carrier Relations  
Department: Integra Telecom – Law & Policy  
Telephone: 763-745-8464

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Request No. 3:

- a. Does Integra receive electronic Firm Order Commitments ("FOC") from Qwest via e-bonding?
- b. Does an Integra system receive the Foe information via an XML interface?
- c. If the response to (b) above is "yes," does Integra use the electronic FOC information to populate its internal systems to schedule tech install assignments without any manual input by an Integra employee?
- d. If the response to (b) is "no", what system does Integra use to receive FOCs?
- e. Does Integra use the electronic Foe information received using the interface identified in response to (d) above to populate its internal systems to schedule tech install assignments without any manual input by an Integra employee?

Response:

- a. No.
- b. No.
- c. No.
- d. IMA GUI
- e. No.

Response By: Bonnie Johnson  
Title: Director, Carrier Relations  
Department: Integra Telecom – Law & Policy  
Telephone: 763-745-8464

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Request No. 4:

- a. Does Integra access the Street Address Guide ("SAG") database using an e-bonded interface with Qwest?
- b. If the answer to (a) above is "yes", does Integra download the SAG data from Qwest and use the downloaded data to update the Integra database automatically without human intervention?
- c. Does an Integra system use the SAG data as a verification tool prior to initiating any order submissions?
- d. Does Integra use the Qwest SAG data to sync with LERG to identify the associated local service office (CLL! code), NPA-NXX, Operating Company Number ("OCN") for all addresses within Integra's own databases?

Response:

- a. No.
- b. No.
- c. No.
- d. No.

Response By: Bonnie Johnson  
Title: Director, Carrier Relations  
Department: Integra Telecom – Law & Policy  
Telephone: 763-745-8464