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July 1, 2015

Ms. Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
500 East Capitol Avenue, 1st Floor  
Pierre, SD 57501-5070

**Re: CenturyLink's Letter regarding CenturyLink Access Service Ordering  
and Billing System Consolidation Plan  
2015 Info TC60**

Dear Ms. Van Gerpen:

On May 5, 2015, in compliance with CenturyLink's commitments made in the FCC's proceeding regarding the transfer of control of Qwest Communications International Inc. to CenturyLink,<sup>1</sup> CenturyLink provided notice to the Commission of its planned Wholesale OSS consolidation for Qwest Corporation and a copy of the detailed CenturyLink Access Service Ordering and Billing System Consolidation Plan ("Consolidation Plan").

CenturyLink invited customers to review and comment on the Consolidation Plan. Customers were also invited to attend a CenturyLink/Customer Preliminary Implementation Plan Review Meeting that was held on May 13, 2015. On June 19, 2015, the updated plan was filed in the Change Management Process. CenturyLink did receive customer comments on the Consolidation Plan and has updated the Consolidation Plan where appropriate to address customer comments.

In this filing, CenturyLink is providing a copy of version 2 of the Consolidation Plan. The revisions to the Consolidation Plan are listed in the new Section, Document Modification Log, which includes brief descriptions of the changes that were made. CenturyLink is also including Appendix A to the Consolidation Plan but notes that no updates were made to the information contained in this document.

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<sup>1</sup> WC Docket No. 10-110, Appendix C, released March 18, 2011.

Ms. Patricia Van Gerpen

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July 1, 2015

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

Very truly yours,

A handwritten signature in black ink, appearing to read "Jason D. Topp". The signature is stylized with a large initial "J" and a long horizontal flourish extending to the right.

Jason D. Topp

JDT/bardm

Enclosure

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of July, 2015, the foregoing letter was E-Filed upon the following party:

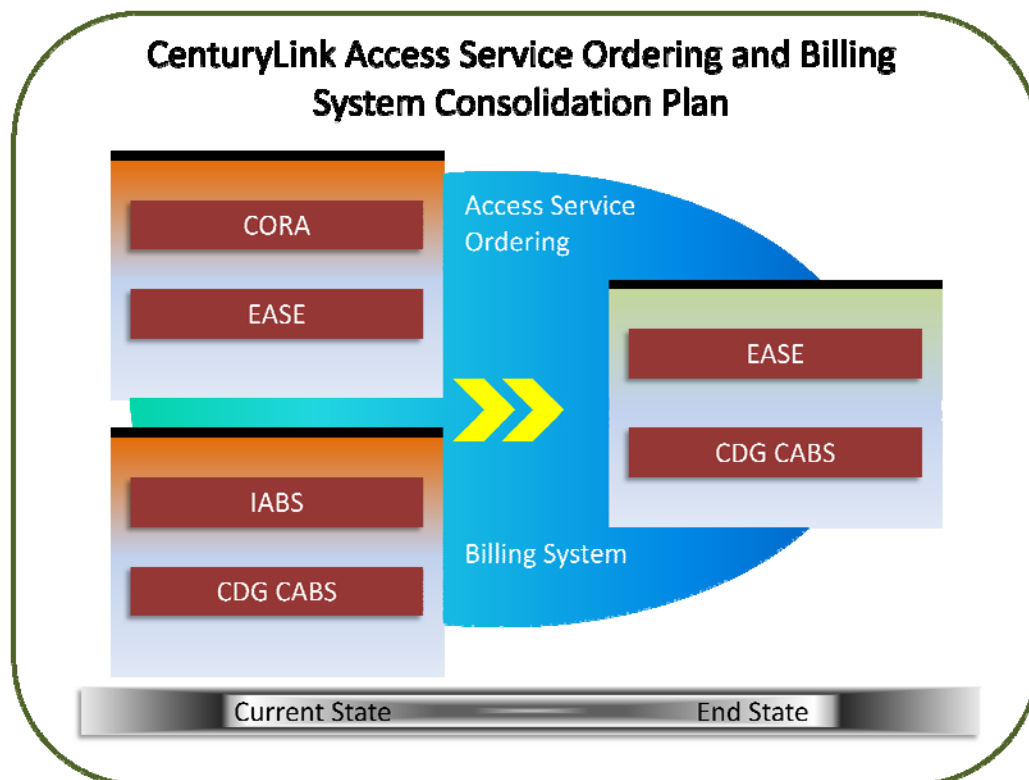
Ms. Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
500 E. Capitol Ave.  
Pierre, SD 57501  
[patty.vangerpen@state.sd.us](mailto:patty.vangerpen@state.sd.us)

and copies sent electronically or via U.S. mail, addressed to the following:

  
Dianne Barthel

## CenturyLink Access Service Ordering and Billing System Consolidation Plan

### Appendix A: CDG CABS Invoice & CSR Examples (Redacted)



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    CDG CABS Facility Invoice & CSR **Example A**: ..... 4

    CDG CABS Switched Invoice & CSR **Example B**: ..... 5

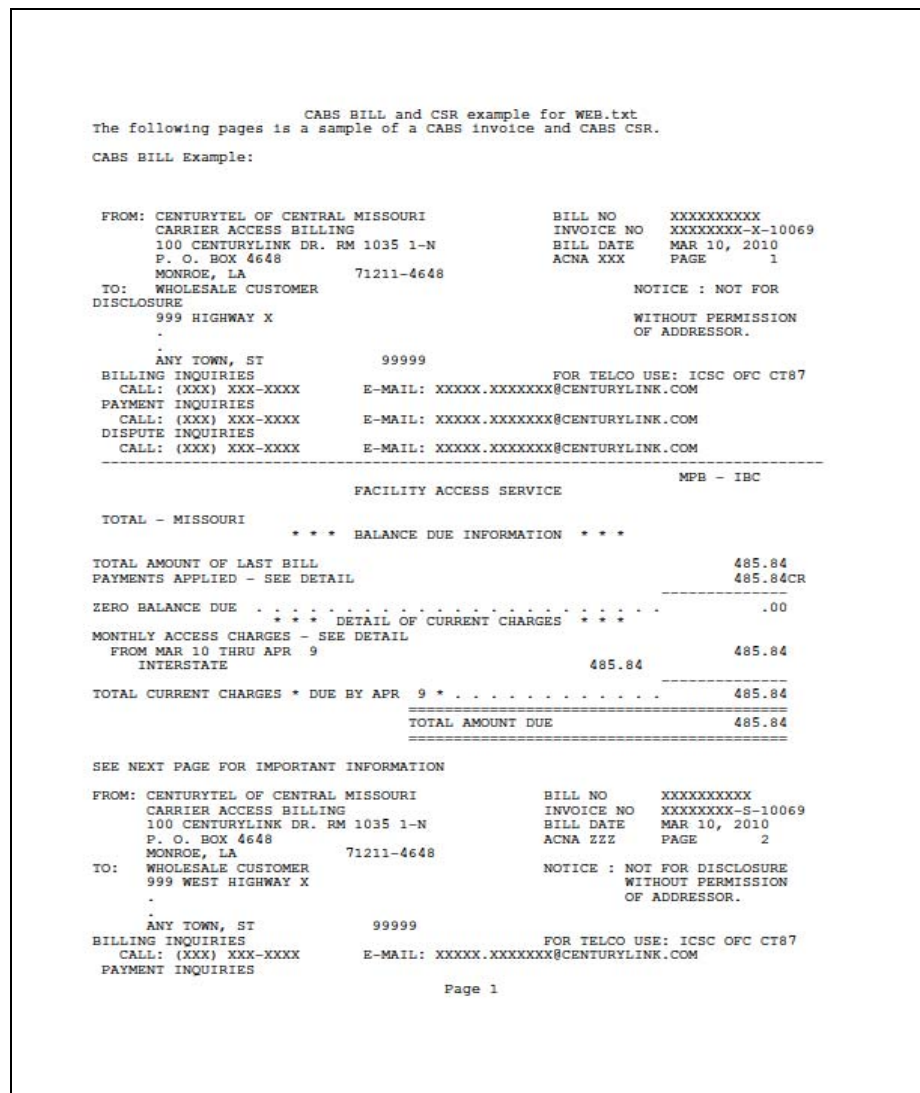
    Local Interconnect Services (LIS) billed in IABS (a switched BAN). IABS LIS Usage Invoice, **Example C**: ..... 6

    Local Interconnect Services (LIS) billed in IABS (a specials BAN). IABS Facility Invoice, **Example D**: ..... 7

# Appendix A: CDG CABS Invoice & CSR Examples (Redacted)

## CDG CABS Facility Invoice & CSR Example A:

Double-click on the image to view the complete eight-page document (via the Adobe Acrobat viewer).



**CDG CABS Switched Invoice & CSR Example B:**

Double-click on the image to view the complete sixty one-page document (via the Adobe Acrobat viewer).

**CABS Switch Usage Invoice and CSR Example 030315 v3**

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The following pages is a sample of a CABS usage invoice and CABS usage CSR.

- Page 1-16 - the CABS Invoice portion of the sample
- Page 17-61 - the CABS CSR portion of the sample

FROM: XXXXXXXX XXXXXXXXXXXX XX X XXXXXXXX  
 CENTURYLINK - ACCESS BILLING  
 100 CENTURYLINK DR. RM 1035 1-N  
 P.O. BOX 4648  
 MONROE, LA 71211-4648

BILL NO XXXXXXXXXXXX  
 INVOICE NO XXXXXXXXXXX-X-15040  
 BILL DATE FEB 9, 2015  
 ACNA ZZZ PAGE 1

TO: NOTICE : NOT FOR DISCLOSURE  
 WITHOUT PERMISSION  
 OF ADDRESSOR.

BILLING INQUIRIES  
 CALL: ( ) - E-MAIL:  
 PAYMENT INQUIRIES  
 CALL: ( ) - E-MAIL: CABS-PAYMENT-QUESTIONS@CENTURYLINK.COM  
 DISPUTE INQUIRIES  
 CALL: (877) 617-2827 E-MAIL: WHOLESALE.DISPUTE@CENTURYLINK.COM

MPB ONE CHECK

SWITCHED ACCESS SERVICE  
 FEATURE GROUP D

TOTAL

\* \* \* BALANCE DUE INFORMATION \* \* \*

TOTAL AMOUNT OF LAST BILL	4.97
PAYMENTS APPLIED - SEE DETAIL	4.97CR
ZERO BALANCE DUE	.00

\* \* \* DETAIL OF CURRENT CHARGES \* \* \*

USAGE CHARGES - SEE DETAIL	1.80
INTRASTATE	.07
LOCAL	1.73
TOTAL CURRENT CHARGES * DUE BY MAR 9 *	1.80

=====

TOTAL AMOUNT DUE 1.80

=====

SEE NEXT PAGE FOR IMPORTANT INFORMATION





Local Interconnect Services (LIS) billed in IABS (a specials BAN). IABS Facility Invoice, **Example D**:

Double-click on the image to view the complete twelve-page document (via the Adobe Acrobat viewer).

### IABS LIS Usage and Facility Invoice Examples

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The following pages are a sample of an IABS usage invoice and IABS usage CSR.

- Page 1-9 - the IABS Invoice portion of the sample
- Page 10-14 - the IABS CSR portion of the sample

	BILL NO INVOICE NO BILL DATE ACNA XXXX	XXXX L08 XXXX XXX XXXXXXXXXXX-XXXXX FEB 7, 2015 PAGE 1
--	-------------------------------------------------	-----------------------------------------------------------------

XXXXXXXXXXXXXXXX C/O XXXXX XXXXXXXX XXXXX XXXXXXXX XXXXX STE XXXX XXXXXXXX	XX XXXXX
----------------------------------------------------------------------------------------	----------

BILLING INQUIRIES CALL (800) 335-5672 TAX ID: 84-0273800	FOR TELCO USE: ICSC OPC 033
-------------------------------------------------------------	--------------------------------

---

LOCAL INTERCONNECTION SERVICES

\* \* \* BALANCE DUE INFORMATION \* \* \*

TOTAL AMOUNT OF LAST BILL		38,672.99
PAYMENTS APPLIED - SEE DETAIL		8,354.69CR
ADJUSTMENTS APPLIED - SEE DETAIL		.00
NON-JURISDICTIONAL	.00	
TOTAL BALANCE DUE		30,318.30

\* \* \* DETAIL OF CURRENT CHARGES \* \* \*

TOTAL - CO - 5102		
LATE PAYMENT CHARGES APPLIED		.00
MONTHLY ACCESS CHARGES		
FROM FEB 07 THRU MAR 06		8,266.30
LOCAL	8,266.30	
OTHER CHARGES AND CREDITS - SEE DETAIL		1,130.64
INTRASTATE	1,156.86	
LOCAL	26.22CR	
TAXES - SEE DETAIL		79.81
TOTAL CURRENT CHARGES * DUE BY MAR 06, 2015 *		9,476.75
TOTAL AMOUNT DUE		39,795.05

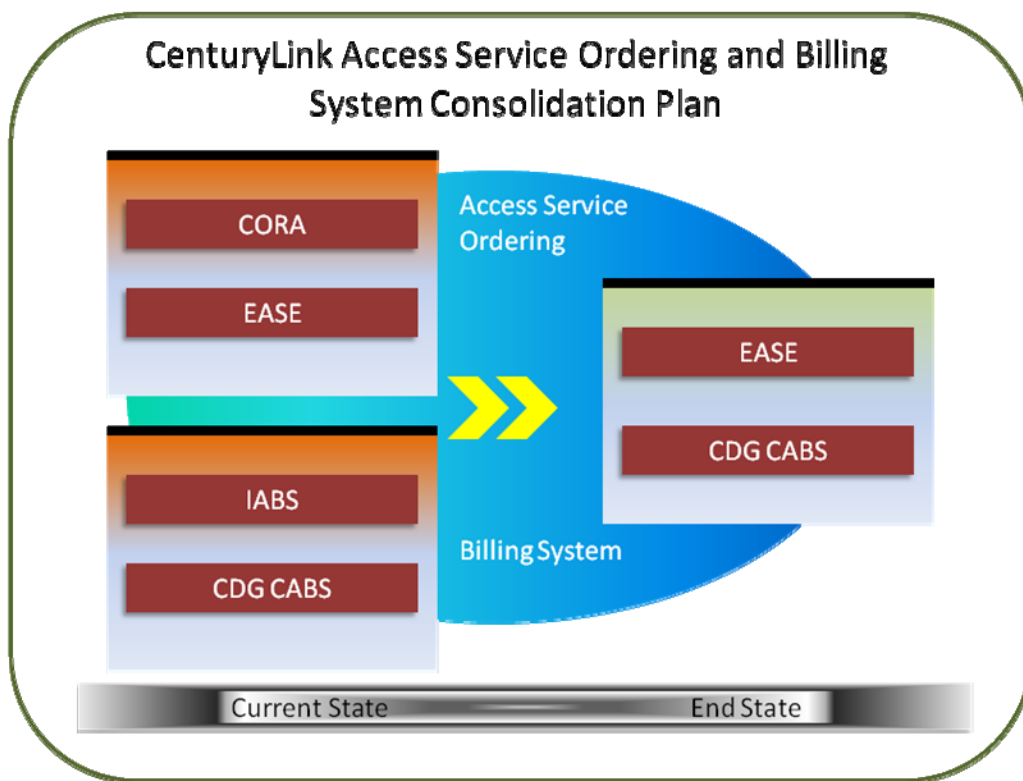
  

	BILL NO INVOICE NO BILL DATE ACNA XXXX	XXXX L08 XXXX XXX XXXXXXXXXXX-XXXXX FEB 7, 2015 PAGE 2
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## CenturyLink Access Service Ordering and Billing System Consolidation Plan



Version 2.0 6/19/15

## Document Modification Log

All revisions to this document are in chronological order.

Version	Date	Description of Change
1	4/29/15	
2	6/15/15	Section 2.3.2 in reference to password removed
2	6/15/15	Section 3.2 adjusted 2Q2015 to 3Q2015
2	6/15/15	Section 1.2 added sentence "CenturyLink will fully utilize CMP post Consolidation." to second bullet
2	6/15/15	Section 2.3.1 updated Footnote 1: to read "BAN validation function will be implemented in EASE before Customer testing begins."
2	6/15/15	Section 2.4.2 added 3rd bullet "As part of the BAN Consolidation effort at consolidation, customers will see certain services billed in IABS today on one BAN split into two BANs in CABS. For example, Wireless Type 2 services in IABS bill on one BAN 'NPA R54 NNNN NNN' (both usage transactions and private line services). In CABS, there will be one BAN for switched usage and one BAN for specials facility services"
2	6/15/15	Section 3.1 updated the date for the 3 <sup>rd</sup> Party Facilitator Selected milestone to 9/30/15

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# 1 Executive Summary

CenturyLink is consolidating its Access 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 Access 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 Access Service Request (ASR) ordering to Electronic Administration & Service Order Exchange (EASE) and the associated billing to Communications Data Group (CDG) Carrier Access Billing System (CABS). (Refer to section: 2: Ordering and Billing System Description for more information.) This consolidation will move some properties off the CenturyLink Online Request Application (CORA) and the Integrated Access Billing System (IABS).

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 ASR services
- Standardized process for ASR handling
- Single view of all ASR orders
- 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 ASR billing functions
- Consistent billing levels – i.e., moving to State vs. Local Access Transport Area (LATA) level billing
- Consistent method to view the billing for any products and services ordered on an ASR
- Consistent bill format for all access billing

## 1.1 Scope

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The CenturyLink Access 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 May 30, 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 Access Service Ordering Guidelines (ASOG) updates
- Future system enhancements to CDG CABS resulting from Ordering and Billing Forum (OBF) updates for the electronic output
- Local Service Request (LSR) processing

## 1.2 Assumptions

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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 ASRs in EASE and receive their bill output from CDG CABS
- Customers will submit orders in ASOG 52 standard format
- CenturyLink will send electronic media in Bill Output Specifications (BOS) 55 standard format
- CenturyLink will continue to update the end state Ordering and Billing systems according to ASOG and BOS per industry schedules after the Consolidation
- Online bill viewing will continue to be available in IABS for 13 months from the Consolidation date
- Historic CORA order inquiry will continue to be available on-line for 24 months from the Consolidation date
- CenturyLink will communicate billing account number changes to Customers before the Consolidation
- IABS Bill and CSR data will be available to view for 13 months after Consolidation
- CenturyLink will retain existing output selections for billing media (i.e., paper vs. electronic) at Consolidation
- Customers will not have to resend any In-Flight orders

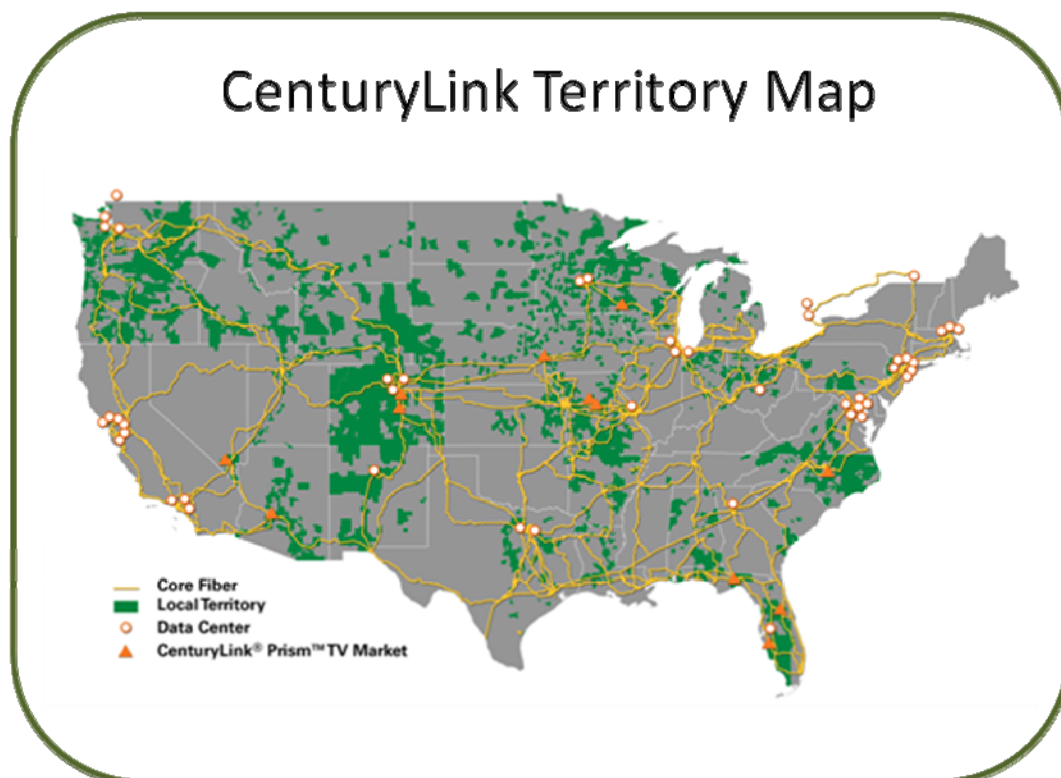
In-Flight orders are:



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

### 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 each acquisition prior to Qwest, CenturyLink consolidated access billing into CDG CABS.



After the acquisition of Embarq in 2009, CenturyLink successfully consolidated the Embarq Access Billing System (CASS) to CDG CABS. IABS and CASS are based on the same data model; therefore, this data Consolidation will be similar to the CASS to CDG CABS Consolidation.

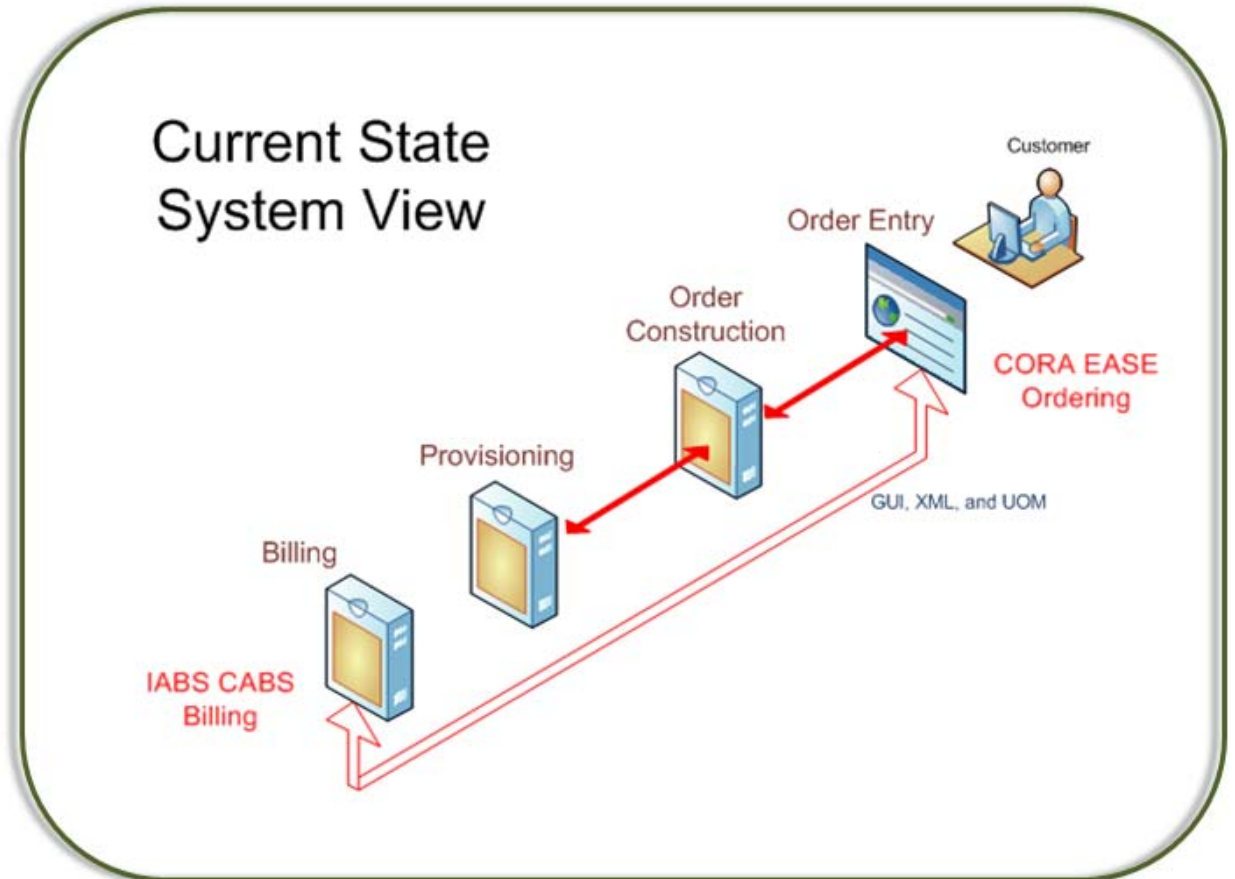
Embarq used the EASE Service Ordering System before acquisition. CenturyLink consolidated Embarq's EASE Service Ordering System ordering into its Access Service Ordering system flow for use in all of its markets at that time.

## 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 Access Service Request Ordering and Billing Systems. CenturyLink uses both EASE and CORA for Access Service Request Ordering. CenturyLink uses both CDG CABS and IABS for billing. The diagram below depicts the current state system view for CORA Ordering and IABS Billing.



CORA is an internally developed ASR submission and results portal, allowing ASR processing via a Graphical User Interface (GUI) and batch files, and real-time eXtensible Markup Language (XML) transactions.

Included within CORA are:

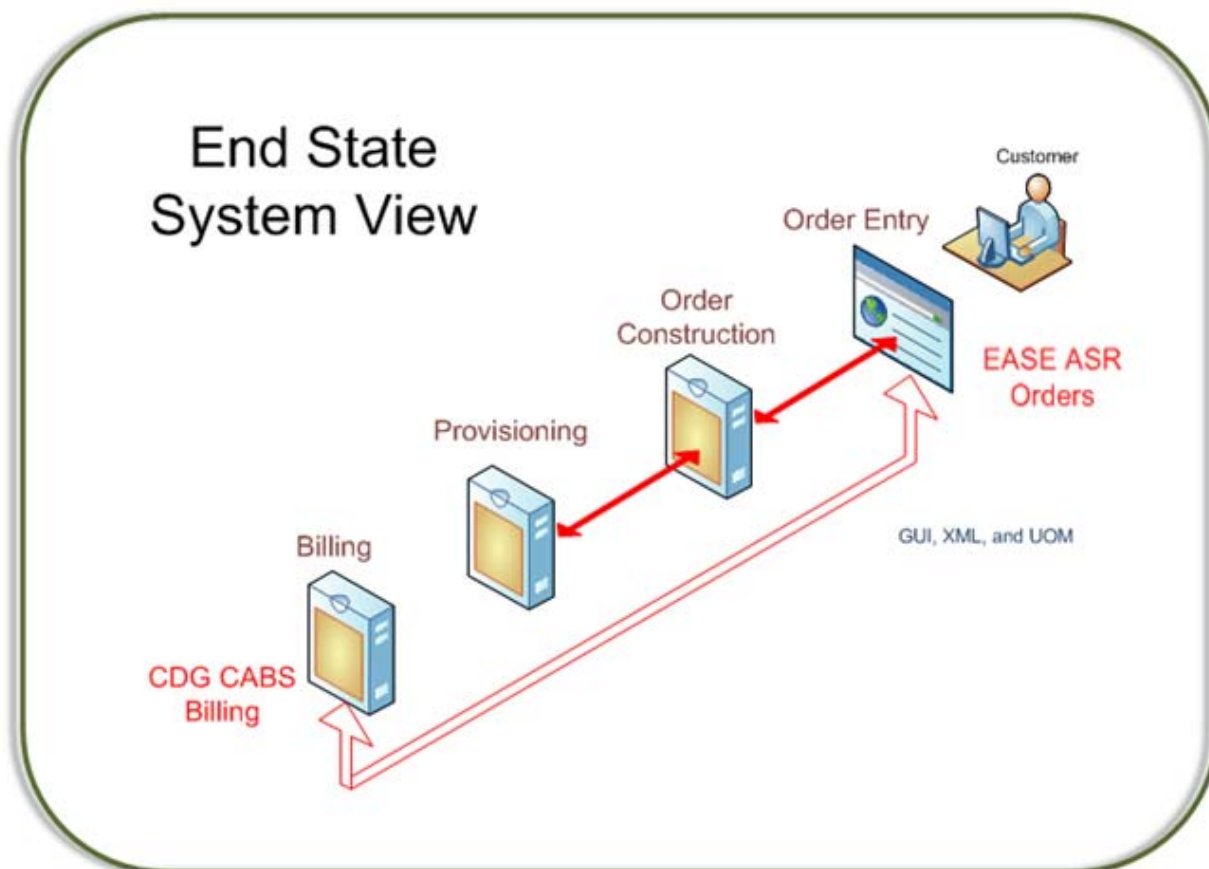
- Edits
- Validations
- Pre-order information queries
- Status information

CORA uses the industry standard Uniform Ordering Model (UOM) data definitions.

IABS is the system that bills Customers for services ordered through CORA.

## 2.2 End State System View

The following diagram shows CenturyLink's Single ASR Ordering and Billing System. It depicts the End State Ordering and Billing System for all CenturyLink Markets.



EASE is the end state ASR submission and results portal used by Customers, as well as CenturyLink, allowing ASR processing via a GUI and batch files, and real-time XML transactions.

Included within EASE are:

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

The Industry Ordering and Billing Forum (OBF) directive will retire the industry Batch Standard by the end of 2016. As communicated in January 2015, CenturyLink will be consolidating its ASR systems by replacing the CORA ASR processing system with the CenturyLink EASE system May 30, 2016. In order for customers to save time and expense, CenturyLink recommends customers wait to migrate to EASE UOM at the time of the ASR system consolidation rather than moving to CORA UOM prior to that consolidation.

CDG CABS is the end state system that bills Customers for services ordered through ASRs.

## 2.3 Access Service Ordering End State System

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CenturyLink Customers use the Synchronoss based EASE system for ASR 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 \$459M.

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 ASR orders. 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 ASOG industry updates. EASE provides the following:

- Single, centralized platform for all ASR 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
- Full compliance with ASOG/ASR industry standards and standard ASR configurations
  - Manages all ASOG updates going forward
- Integration with back office systems
  - Platform Application Programming Interface (API) will support additional integrations as needed for all ASR Order volumes.
- Platform Expandability
  - Local Number Portability (LNP) / Local Service Request (LSR) / Receive / custom transaction types

### 2.3.1 Service Ordering Functionality – CORA to EASE (ASOG 52)

The following matrix is a comparison of functionality between the EASE and CORA systems:

Functionality	CORA	EASE
Support eBonding and portal for ASR requests	Yes	Yes
Industry standard ASR forms and fields	Yes	Yes
Pre-order query:		
Scan CLLI codes	Yes	Yes
Validate a CFA	Yes	Yes
Validate NC/NCI/SecNCI	Yes	Yes
Validate Address		
- By street address	Yes	Yes
- By WTN	Yes	Yes
- By circuit	Yes	Yes
Validate a BAN	Yes	Yes <sup>1</sup>
Create and submit a request	Yes	Yes
Revise a rejected request	Yes	Yes
Supplement a request	Yes	Yes
Up front order editing	Yes	Yes
Search ASRs	Yes	Yes
Wildcard search	Yes	Yes
Order tracking	Yes	Yes
Order replication and template creation	Yes	Yes
Online Help	Yes	Yes
Field Level Help	Yes	Yes
View Confirmations	Yes	Yes
Receive Design Layout Reports (DLR)s	Yes	Yes
Order History	Yes	Yes
Order Status	Yes	Yes
Customer user admin function	Yes	Yes
Reporting	Yes	Yes

<sup>1</sup>BAN validation function will be implemented in EASE before Customer testing begins.

**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.

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

### 2.3.2 Access Service Ordering Differences between EASE and CORA

- Each Owner Agent has a single login in CORA and is able to submit ASRs for all companies he/she represents. In EASE, an Owner Agent has a single login for a company and for all related companies within the same hierarchy. Separate login IDs will be required if related companies have separate hierarchies in ordering. In this instance, an Owner Agent submits orders for multiple companies by having multiple browser

sessions opened, one for each company. This feature provides stronger controls to prevent unauthorized user access.

- Comprehensive Global Validation – When a Customer enters an order, CORA provides form level validations on demand. CORA experiences its validation optionally after each page completion, as well as systematically when the Customer submits the order. EASE provides validations on demand, during the order entry process, and before order submission.

## 2.4 Billing End State System

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CenturyLink uses CDG CABS to bill services ordered through an ASR. Communications Data Group (CDG) is a privately owned company, established in 1970. CDG specializes in providing software solutions and services for companies in the telecom sector. CDG CABS is a robust, flexible, table driven system that is business configurable. CDG CABS meets the C/BOS industry standards for Bill and CSR (Customer Service Record) electronic records, as well as paper invoice outputs.

CDG is the only vendor that has ever been a member of the BOS Technical Review Group (TRG). The TRG committee maintains the BOS format for Interconnection billing. It is generally comprised of carriers, not vendors. CDG is also a member of the Ordering & Billing Forum (OBF) Billing Committee and the Metro Ethernet Forum (MEF).

CDG CABS has been utilized by numerous ILEC's, Rural Local Exchange Carriers (RLEC's), CLEC's, Wireless, Cable and Broadband providers of all sizes over the years and is the choice of 11 of the 20 largest LECs in the country.

CenturyLink continues to work with CDG to enhance systems to provide Customers the accuracy, efficiency, and industry compliance they need to succeed.



### 2.4.1 Billing System Functionality – IABS to CDG CABS (BOS 55)

The following table shows key capabilities of the CDG CABS System.

IABS to CABS Billing System Integration	
Key Capabilities	Description
Online Bill View	CenturyLink will provide the Customer with an external link for up to 18 months of bill invoices, CSRs, and remittance slips. The Customer will be able to sign up for this access. This history will be built going forward after Consolidation.
Media Options	CDG CABS provides multiple options for receiving bills. Options include paper, online bill viewing, and electronic BOS standard files.
Invoices and CSRs	CenturyLink will continue to provide industry compliant invoices and CSRs Refer to separate attachment for Appendix A: CDG CABS Invoice & CSR Examples.

**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.

Refer to the following link to view more information about BOS (Bill Output Specifications): <http://telecom-info.telcordia.com/site-cgi/ido/docs2.pl?ID=&page=cabslist>

### 2.4.2 Billing System Differences between IABS and CABS

- Customers will be required to change the routing location for payment processing. CenturyLink will provide notification of this change in advance of the requirement deadline.
- IABS billing is at the LATA level and CDG CABS billing is at the State level. The implementation of this plan will consolidate multiple existing LATA level accounts into a Single State level account. CenturyLink will communicate Account Mapping before Consolidation. Where applicable, CenturyLink will send new Billing Account Numbers (BANs) that include a unification of BANs at a State level, rather than at a LATA level, before Consolidation.
- As part of the BAN Consolidation effort at consolidation, customers will see certain services billed in IABS today on one BAN split into two BANs in CABS. For example, Wireless Type 2 services in IABS bill on one BAN 'NPA R54 NNNN NNN' (both usage transactions and private line services). In CABS, there will be one BAN for switched usage and one BAN for specials facility services.
- The current Channel Mileage Universal Service Order Code (USOC) which bills for fixed and variable mileage will be split into two USOCs – one for fixed and one for variable.
- CDG CABS offers an online tool which stores up to 18 months of bills, Customer Service Records (CSRs), and remittance page history.

CenturyLink offers this in lieu of the IABS abbreviated print bill functionality. Existing abbreviated bill functionality allows Customers to receive a printed output of certain sections of their bill only.

- Currently, CDG CABS BOS updates are in March and IABS BOS updates are in November. Annual BOS updates post Consolidation will continue to follow the March implementation schedule.
- Technical Specifications will explain any electronic billing file differences, if applicable.
- Switched invoices will summarize usage details at a master Carrier Identification Code (CIC) level. CenturyLink assigns the master CIC and is most likely (although not always) represented by the 'primary' CIC or Operating Company Number (OCN) for a Customer. For the usage summarization on the IABS FG (Feature Group) D switched bills – IABS presents CICs (based on the CIC in the usage record) separately under a given OCN. On a CDG CABS FG D bill, the Customer will see usage summarized at the OCN/CIC level (rolling multiple CICs into one).


### 3 Consolidation Plan Implementation

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

#### 3.1 Consolidation Plan Schedule and Milestones

Consolidation completion is May 30, 2016. CenturyLink will comply with all applicable Merger Requirements, including use of the CMP process.

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 CRs for System Introduction and Retirement CRs SCR120314-1, SCR120314-2, SCR120314-3 and SCR120314-4 These can be found at: <a href="http://www.centurylink.com/wholesale/cmp/cr/crnumber_system_in dex.html">http://www.centurylink.com/wholesale/cmp/cr/crnumber_system_in dex.html</a>	12/3/14
ASR Consolidation Plan due	4/29/15
Initial Release Notification (for SCR120314-1 and SCR120314-2)	4/29/15
Initial Retirement Notice (for SCR120314-3 and SCF120314-4)	4/29/15
ASR Consolidation Plan Review Meeting	5/13/15
Extended Customer Comment Window for Initial Release Notification, Initial Retirement Notice and Consolidation Plan	5/29/15
CenturyLink issues response to CLEC comments and Final Retirement Notice, including the Final version of the ASR Consolidation Plan	6/19/15
3 <sup>rd</sup> Party Facilitator Selected	9/30/15
Draft Interface Tech Specs	11/2/15



Consolidation Plan Milestone	Date
Tech Specs Walk-through	11/12/15
CLEC Comments for Interface Tech Specs	11/18/15
Final Interface Tech Specs	11/23/15
(New) GUI Initial Release notice	12/17/15
(New) GUI Draft Release notes	1/4/16
Product Process Notification associated with Level 2 OSS changes	1/4/16
(New) GUI Interface Review Meeting	1/5/16
CLEC comments due on (New) GUI Release Notes	1/6/16
(New) GUI Final Release Notes	1/8/16
CLEC comments due on Level 2 OSS Product Process changes	1/11/16
Training available	1/11/16
Draft Revised Interface Tech Specs (if needed for ASOG 52)	1/15/16
Final notice for Level 2 OSS Product Process changes	1/18/16
Customer Testing Begins with ASOG 51 ASR Consolidation Functionality (120 Days)	1/18/16
Revised Tech Specs Walk-through	1/19/16
CLEC Comments for Revised Interface Tech Specs	2/2/16
Final Revised Interface Tech Specs	2/12/16
Customer Testing continues with both ASOG 51 and 52 Consolidation Functionality	2/22/16
Customer Testing Ends	5/17/16
Customer Go/No Go Vote	5/17/16
Release to Production	5/30/16

### 3.2 3<sup>rd</sup> Party Facilitator

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

The Third Party Facilitator will be engaged in 3Q2015. The CLECS will have the opportunity for input on the 3<sup>rd</sup> 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 1Q2016 resolution.<sup>1</sup>

<sup>1</sup> 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 Consolidation Plan Implementation

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

#### 3.3.1 Internal CenturyLink Consolidation Testing

CenturyLink will execute test orders through EASE to ensure that proper billing codes assignment occurs and the orders flow successfully into CDG CABS 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, 'mock' consolidations from IABS into CDG CABS prior to the Customer testing period will be iteratively executed
- Test bills will be generated and compared to production IABS 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 /CORR and CABS/IABS 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 orders 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 CORA 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 CORA volume is included. Specifically:

- The Load & Performance test will be conducted prior to Consolidation, but no later than end of 1Q2016
- The combined ASR 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 ASRs 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 Weekend Consolidation Plan

The overall Consolidation from ordering through billing will be a flash cut. This means that Customers will submit orders via CORA pre-Consolidation weekend and new orders post-Consolidation will go into EASE. The weekend Consolidation cutover will be for all properties. The Consolidation weekend will be 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 IABS will convert and all new bills generated from CDG CABS.

### 3.3.6 Contingency Plan

A backup of all relevant source and target databases will occur at the beginning of the extended maintenance window. Once these backups complete successfully, consolidation activities will begin. The CDG CABS database will contain IABS products, in-flight orders 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: CDG CABS Invoice & CSR Examples (Redacted)

Please reference Appendix A, Version 1 4/29/15 in attached document

## Appendix B: Regulatory Organizations, Guidelines and Standards

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

- ASOG (Access Service Ordering Guidelines)
  - <http://www.atis.org/obf/download.asp>
- BOS (Bill Output Specifications) and the BOS Technical Review Group (TRG)
  - <http://telecom-info.telcordia.com/site-cgi/ido/docs2.pl?ID=&page=cabslist>
- CMP (CenturyLink Change Management Process)
  - <http://www.centurylink.com/wholesale/cmp/review.html>
- FCC (Federal Communications Commission)
  - [www.fcc.gov/](http://www.fcc.gov/)
- OBF (Ordering and Billing Forum)
  - <http://www.atis.org/obf/download.asp>
- 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
ASOG	Access Service Ordering Guidelines
ASR	Assess Service Request
BAN	Billing Account Number
BOS	Bill Output Specifications
C/BOS	CABS Billing Output Specifications
CABS	Carrier Access Billing System
CDG	Communications Data Group
CDG CABS	The Carrier Access Billing System created and owned by Communication Data Group
CFA	Carrier Facility Assignment
CIC	Carrier Identification Code
CLEC	Competitive Local Exchange Carrier
CLLI	Common Language Location Identifier
CMP	Change Management Process
CORA	CenturyLink Online Request Application
CSR	Customer Service Records
Current State System View	Denotes CenturyLink's existing systems and their functionality pre-Consolidation
EASE	Electronic Administration & Service Order
End State System View	Denotes CenturyLink's systems and functionality post Consolidation
FCC	Federal Communications Commission (USA)
GUI	Graphical User Interface
IABS	Integrated Access Billing System
ILEC	Incumbent Local Exchange Carrier
LATA	Local Access Transport Area
LEC	Local Exchange Carrier
LIS	Local Interconnect Services
LNP	Local Number Portability
LSR	Local Service Request
NC	Network Channel

NCI	Network Channel Interface
OBF	Ordering & Billing Forum
OCN	Operating Company Number
OSS	Operating Service System
PUC	Public Utility Commissions
RLEC	Rural Local Exchange Carrier
SEC NCI	Secondary Network Channel Interface
TRG	Technical Review Group
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 of IT Billing	20	20	0	IT Billing
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 Access 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 Access Billing Process
Sr. Lead Project Manager	15	4	11	Overall Project Manager for completion of the Consolidation Plan