

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: September 13, 2016**

REGULAR  CONSENT  EFFECTIVE DATE Upon Approval

DATE: August 29, 2016

TO: Public Utility Commission

FROM: Armando Fimbres *AF*

THROUGH: *JF* Jason Eisdorfer and *BC* Bryan Conway

SUBJECT: QWEST CORPORATION: (Docket No. UM 1737) Access Service Ordering and Billing System Consolidation Plan.

**STAFF RECOMMENDATION:**

Staff recommends that the Commission find the Qwest Corporation dba CenturyLink QC (CenturyLink) conversion of Qwest's Access Service Operations Support Systems (OSS) per the company's Consolidation Plan, filed July 18, 2016, will not result in deterioration in the company's OSS and performance levels.

**DISCUSSION:**

Issue

Whether the relevant requirements have been met to permit CenturyLink to proceed with its planned conversions of Qwest's Access Service ordering and billing systems. The decision rests on a finding that the conversions will not result in deterioration in the company's OSS and performance levels.

Applicable Law and Orders

The need for a decision stems from requirements in condition number 27 imposed by Commission Order No. 11-095 approving the merger of CenturyTel and Qwest. This condition addresses requirements relating to any post-merger replacement or retirement of a Qwest OSS interface. Specifically, condition number 27.c.iv. in Appendix A of the subsequent Errata Order No. 11-101, states:

Notwithstanding the conditions set forth in subparagraph i., CenturyLink shall provide the Commission with 90 days notice of its intention to cease making the Qwest OSS system available to

wholesale customers. The cutover shall not occur until the Commission has conducted an expedited investigative review and concluded that the post-merger OSS and performance levels will not deteriorate.

Subparagraph i., as well as subparagraphs ii. and iii., relate to requirements for coordinated wholesale carrier customer testing and acceptance of changes to Qwest OSS systems.

Discussion and Analysis

On April 30, 2015, CenturyLink filed its initial Consolidation Plan that specified the steps the company would take to transition Qwest from the OSS it had been using for access service ordering and billing to the systems currently in use by the other CenturyLink local exchange carriers, i.e., United Telephone and CenturyTel. The initial cutover date to the new systems was expected to be May 30, 2016. On June 30, 2015, CenturyLink filed an updated Consolidation Plan that incorporated customer input. On January 20, 2016, CenturyLink filed an updated plan to move the cutover date to August 1, 2016. On July 18, 2016, CenturyLink filed an updated plan to move the cutover date to October 3, 2016.

A prehearing conference was held on July 8, 2015. One party, Integra, filed a petition to intervene in the docket. As a competitive carrier that buys CenturyLink access services in Oregon and other states, Integra utilizes the ordering and billing systems at issue here. Staff, CenturyLink, and Integra met three times at critical stages of the transition process to discuss progress and issues, and submitted status reports to the ALJ. CenturyLink worked with affected carriers to gather input via the company's Change Management Process (CMP) conference calls. The planned system changes will impact carriers that order access services in all Qwest states, not just Oregon. Staff attended these calls to monitor progress and carrier input.

Carrier testing of the new systems began on March 21 of this year and concluded by July 18, 2016. CenturyLink sent notices to the CLECs participating in testing – Integra, Windstream, and XO – with a request to respond with their Go/No Go Voting Ballet by July 26, 2016. The following was received by CenturyLink:

- Integra submitted a "Yes" vote conditioned on CenturyLink committing to resolving Defect 1362 (*Unable to determine what PON is associated with an emailed response by the subject line*) by mid-August 2016 and Defect 1365 (*EASE reporting functionality does not appear to be equivalent to the reports provided in CORA*) by end of the 1st Quarter 2017.
- Windstream submitted a "Yes" vote.

- XO elected to not submit a vote.

CenturyLink agreed to the Integra conditions during testing so no further action was believed to be needed.

Conclusion

The Consolidation Plans filed by CenturyLink, the first of which was filed on April 30, 2015, meet the merger condition requirement for 90-day advance notice of Qwest wholesale OSS changes.

Staff's investigation indicates that the conversions will meet the merger condition number 27 requirement that OSS conversions not lead to deterioration in performance levels.

**PROPOSED COMMISSION MOTION:**

Find that the CenturyLink conversion of Qwest's Access Service OSS per the company's Access Service Ordering and Billing System Consolidation Plan filed July 18, 2016, originally filed April 30, 2015, will not result in deterioration in the company's OSS and performance levels.