

# LATHAM & WATKINS LLP

January 10, 2011

## EX PARTE VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

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Re: *Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a/ CenturyLink for Consent to Transfer of Control*, WC Docket No. 10-110

Dear Ms. Dortch:

On December 10, 2010, PAETEC filed a letter in the above-captioned docket. PAETEC's letter and its attachments contain numerous inaccuracies, and raise no meaningful issues.

First, the asserted purpose of PAETEC's filing is to compare Qwest's e-bonded capabilities with the e-bonded capabilities that PAETEC attributes to CenturyLink. But PAETEC claims that it has information about CenturyLink's e-bonded capabilities because "PAETEC uses a third party provider which is e-bonded with EASE to submit orders ... on behalf of PAETEC."<sup>1</sup> That is false. The third party that PAETEC references, Neustar, is *not* e-bonded with CenturyLink. Rather, Neustar sends to CenturyLink batch orders via an FTP interface. This is an entirely different mechanism from CenturyLink's e-bonded, system-to-system interface. Moreover, the FTP process used by PAETEC's third party to submit orders employs a transmission capability that was developed to support a predecessor application that CenturyLink retired in March 2010. CenturyLink maintains this batch functionality to minimize the impact of transition to EASE for legacy users of the FTP process. As a result, *all* of the evaluation answers that PAETEC lists in its column titled "EASE - Electronic Data Interface (EDI) LSR" are answers that (1) are based on an outdated system and (2) do not reflect CenturyLink's actual e-bonded capabilities.<sup>2</sup>

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<sup>1</sup> PAETEC Dec. 10, 2010 Ex Parte, WC Docket No. 10-110 at 2-3.

<sup>2</sup> PAETEC implies that its third party, Neustar, is an objective evaluator of CenturyLink's capabilities. Neustar in fact is a direct competitor to the software developer that created the infrastructure used in CenturyLink's EASE system. Neustar bid on the work to develop EASE, and did not win the bid proceeding.

Second, PAETEC's evaluation matrix misleads the reader by marking multiple evaluation questions "No\*" ("no" with an asterisk). However, the footnotes buried at the end of the matrix state that "No\*" actually means that PAETEC lacked information to conclude whether or not the EASE system performed the function. Thus, "No\*" actually means "unknown." If PAETEC actually had the information necessary to perform a complete and objective comparison, it would have discovered that most of the "No\*" entries in fact should be "Yes."

Third, PAETEC has chosen not to include any information about enhancements that are in development or part of CenturyLink's development roadmap. For example, PAETEC states that EASE does not "Auto-fill or Pre-Populate" the LSR with pre-order information. This functionality is currently under development and targeted for implementation within 90 days.

Finally, PAETEC's evaluation matrix includes multiple entries that simply are wrong. In particular, PAETEC's chart refers only to two types of EASE interfaces (GUI and EDI), but does not discuss at all the capabilities that currently are available through CenturyLink's more robust, state-of-the-art UOM interface. This omission results in multiple errors throughout the chart. A few examples of the errors in the chart should suffice:

- Electronic Access Availability - EASE has an advanced industry standard real time E-Bonding capability based on UOM industry standards. The evaluation erroneously states that CenturyLink's only interface is a batch interface.
- Validate Street Address in Pre-Order - EASE has a location inquiry pre-order and provides alternate suggestions via GUI or UOM interface when an incorrect address is provided. The evaluation states erroneously that the address must be input exactly as in the system to get a match.
- Validate by Telephone in Pre-Order - Both the GUI and UOM Customer Service Request ("CSR") will provide an address based on entry of telephone number. The evaluation states erroneously that CenturyLink does not have the capability to look up an address based on a telephone number.
- Partial or Full CSRs in Pre-Order - These are available in the GUI and via UOM retrievable by TN or ECCKT. The evaluation states erroneously that CenturyLink does not have this capability.
- DLRs (Directory Listing Requests) in Pre-Order - These are available via the GUI and the UOM interface. The evaluation states erroneously that CenturyLink has this capability only via the GUI.
- Order Status (Acknowledge, Order Confirmation and Completion) - These are available in the GUI and UOM interfaces. The evaluation states erroneously that they are available only in the batch interface.

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- All orders can be pre-edited prior to order submission in the GUI - The evaluation states erroneously that this capability is not available.

These are representative examples that highlight the numerous inaccuracies in PAETEC's filing. The Commission consequently should give it no weight.

Very truly yours,

/s/

Karen Brinkmann  
Alexander Maltas  
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cc: Zac Katz  
Sharon Gillett  
Alex Johns  
Bill Dever