

Washington
UT-090892
WUTC 2-4

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 4

BENCH REQUEST NO. 4:

1. Describe in detail, all instances in which Qwest's Customer Transfer Charge (CTC) is applied to local service requests (LSRs) submitted by other carriers. Your response should include, but not be limited to, LSRs submitted pursuant to the following customer transfer scenarios:

- Disconnection and transfer of a Qwest customer to McLeodUSA where McLeodUSA intends to use a Qwest unbundled loop to serve the transferred customer.
- Disconnection and transfer of a Qwest customer to McLeodUSA where McLeodUSA intends to use resale of Qwest local service to serve the transferred customer.
- Disconnection and transfer of a Qwest customer to McLeodUSA where McLeodUSA intends to serve the transferred of its own facilities or the facilities of another carrier (not Qwest).

2. Does Qwest assess a CTC for LSRs submitted by other carriers, including McLeodUSA, for porting requests that involve no other wholesale service or interconnection-related activities, other than the port?

RESPONSE:

1. The Customer Transfer Charge (CTC) only applies to the transfer of a retail customer to a reseller, not to a CLEC who provides service over its own facilities or through purchase of Unbundled Network Elements (UNEs). Thus, the CTC only applies to resale situations. The term 'Resale' generally refers to the 'resale' of fully finished Residential, Business, Private Line and Integrated Services Digital Network (ISDN) services and features pursuant to the requirements of Section 251(c)(4). This means that Qwest provides the end-to-end service all the way to the end-user on behalf of the CLEC, while the CLEC has the actual service provider relationship with the end-user. Qwest charges the CLEC the retail rate for the service minus the wholesale discount.

Qwest's CTC applies when a customer moves to a CLEC and Qwest provides resold retail services to the CLEC so the CLEC can serve the customer. The CTC reflects costs associated not with the disconnection of a customer but costs associated with Qwest fulfilling another carrier's request to purchase retail services at a wholesale discount and resell those services to the end user. This charge is not applied if the CLEC provides service over its own facilities or where a CLEC intends to use a Qwest unbundled loop to serve the transferred customer.

The McLeod Wholesale Service Order Charge is not comparable to the CTC as Qwest is not purchasing a retail service from McLeod, nor any service from McLeod, and the CTC is not for disconnection of the unbundled loop.

For the scenarios listed above:

- Disconnection and transfer of a Qwest customer to McLeodUSA where McLeodUSA intends to use a Qwest unbundled loop to serve the transferred customer.

The CTC does not apply here. In this scenario, McLeod is not purchasing resale service. Qwest assesses McLeod the commission approved installation charge because McLeod is purchasing an unbundled loop from Qwest. These charges are separate and distinct from the commission approved rate element for the CTC listed in Exhibit A to the ICA.

When a Qwest customer requests transfer of its local service and number to McLeod, or for that matter, another carrier in a non-resale situation, Qwest does not charge McLeod for the porting costs.

- Disconnection and transfer of a Qwest customer to McLeodUSA where McLeodUSA intends to use resale of Qwest local service to serve the transferred customer.

Because McLeod is purchasing a resale service in this scenario, the CTC applies.

- Disconnection and transfer of a Qwest customer to McLeodUSA where McLeodUSA intends to serve the transferred of its own facilities or the facilities of another carrier (not Qwest).

The CTC does not apply here. Qwest would port the number to McLeod or the carrier providing facilities at no charge. This scenario occurs most frequently with non traditional carriers such as wireless or cable providers.

2. No. Qwest does not charge a CTC or other charge to a carrier for porting a number to that carrier, regardless of whether there are any wholesale services ordered.

Respondent: Robert Weinstein

Washington
UT-090892
WUTC 2-6

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 6

BENCH REQUEST NO. 6:

Do you accept and process customer transfer requests, including porting requests, from other carriers without requiring use of an LSR?

RESPONSE:

No. Customer transfer requests from a wholesale perspective are required to be submitted on LSRs.

Respondent: Robert Weinstein