

WUTC Docket No. UT-083041
Charter Responses to Qwest First Data Requests
October 31, 2008

Data Request No. 5:

On pages 20, lines 12-14 Mr. Gates states that carriers are prohibited from “shifting to other carriers the costs of transporting that carrier’s own traffic to the POI.” Is it Mr. Gates’ contention that Qwest’s proposed language would require such cost shifting? If so, please describe the specific language and explain how it would require the shifting of costs.

Response:

All general objections and all objections to definitions and instructions are incorporated into the specific objection regarding this Request. Subject to, and without waiver of, these objections, Charter responds as follows: Charter believes that the following Qwest proposed ICA sections are examples of language that could require Charter to pay for facilities and/or trunking on Qwest’s side of the POI:

Qwest proposed § 7.1.2 – Requires that Charter implement multiple POIs thereby incurring costs to establish additional POIs and trunking on the Qwest side of the Charter preferred POI.

Qwest proposed § 7.1.2.3 – Limits a meet point interconnection to being within one of Qwest’s serving wire centers thereby forcing Charter to place additional facilities to meet Qwest within that wire center rather than at a mutually agreeable point within the LATA.

Qwest proposed § 7.3.2 – Requires Charter to purchase Direct Trunked Transport from a POI established in one local calling area to an end office or tandem in another local calling area.

Prepared by: Counsel (objections); Bill Pruitt
Date: October 31, 2008