

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

**IN THE MATTER OF THE PETITION
FOR ARBITRATION OF AT&T
COMMUNICATIONS OF THE PACIFIC
NORTHWEST AND TCG SEATTLE WITH
QWEST CORPORATION PURSUANT TO
47 U.S.C. § 252(b)**

DOCKET NO. UT-033035

**QWEST CROSS EXAMINATION EXHIBIT
REGARDING CROSS OF DAVID L. TALBOTT**

AT&T'S RESPONSE TO QWEST IR 01-024

Qwest 01-024: Identify all circumstances under which a CLEC's switch would not qualify as a tandem switch under AT&T's proposed definition of a tandem switch.

RESPONSE & OBJECTIONS TO DATA REQUEST QWEST 01-024:

AT&T objects to this request as unduly burdensome in its request for an exhaustive list of "all" circumstances wherein a CLEC's switch would not qualify as a tandem. AT&T further objects that this request calls for speculation and legal conclusions drawn from interpretations of the FCC rules. Without waving its objection, AT&T states in those cases where the CLEC switch is not capable of serving the same geographic area that a tandem switch serves, it would not meet the definition. Switches might be incapable of serving the same geographic areas for any number of reasons. By way of example, the switch may not be interconnected to the appropriate facilities to serve various areas, the CLEC may not be certificated to serve the area or exchange service tariffs may not be filed with the Commission.

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NORTHWEST AND TCG SEATTLE WITH
QWEST CORPORATION PURSUANT TO
47 U.S.C. § 252(b)**

DOCKET NO. UT-033035

**QWEST CROSS EXAMINATION EXHIBIT
REGARDING CROSS OF DOUGLAS N. HYATT**

AT&T'S RESPONSE TO QWEST IR 01-029

Qwest 01-029: Referencing AT&T/TCG's "foreign exchange-like (aka "VFX" or "VNXX")" offering, identified on page 3 of the Direct Testimony of Douglas Hyatt, identify all provisions of the tariffs of AT&T and TCG that relate to AT&T/TCG's "foreign exchange-like (aka "VFX" or "VNXX")" offering to customers (business or residential) in Washington.

RESPONSE & OBJECTIONS TO DATA REQUEST QWEST 01-029:

AT&T objects to this request as overly broad and unduly burdensome in its request for "all" tariffs and its request that AT&T do Qwest's research.

Without waiving its objections, AT&T states that its VFX or VNXX service is offered as part of the PrimeConnect Switched Direct Inward Dialing (DID) service in Washington. PrimeConnect customers are typically Enhanced Service Providers (ESP) or Internet Service Providers (ISP). See **Qwest 01-029 Attachment F**.

4.0 TCG NETWORK SERVICES (Cont'd.)

4.2.3.2 Multi-location Calling

Multi-location Calling allows for the completion of calls on an intercom basis between affiliated users located at different sites. This service is available on a fixed monthly rate or message rate basis. A Multi-location Calling message is defined as a completed call connecting any two Multi-location users within a LATA. A call between two locations is considered a Multi-location call, even if the terminating location is not the final destination of the call.

1. PrimeXpress Network Service

A) Description

PrimeXpress Network Service provides dedicated connections from an end user's Premises to Business Calling Service and to services provided by interexchange carriers that have interconnected to the Company's switch. PrimeXpress Network Service is delivered to the Customer premise at a DS1 (1.544 Mbps) rate. A PrimeXpress facility may be provided as stand-alone service or provisioned over an existing or new AT&T ACCU-Ring facility. PrimeXpress Network Service is available on a 1, 2, or 3 year term commitment.

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The Customer may opt to utilize PrimeXpress Network Service for outgoing calls only (DOD), incoming calls only (DID) or a combination of both inbound and outbound calls. When the Customer elects to utilize PrimeXpress Network Service for both inbound and outbound calls, they may choose Combo service which allows incoming calls to an attendant only or they can elect to utilize DID/DOD service which allows incoming calls to be terminated directly to an End User behind a PBX or capable Key System. When DID or DID/DOD service is ordered, direct inward dialing (DID) numbers must be purchased from the Company.

4.0 TCG NETWORK SERVICES (Cont'd.)

1. PrimeXpress Network Service (Cont'd.)

Description (Cont'd.)

Customers may elect to utilize multiple service types on the same PrimeXpress DS1 facility providing the total number of voice-grade (DS0) communications channels equals 24. When this option is selected, the per DS0 trunk charge is applied in the appropriate quantities in place of the per DS1 facility charge.

PrimeXpress Network Service trunks configured for Inbound and Outbound calling functionality that, upon detection by The Company, exceeds 200,000 MOU, and attains 100% utilization for inbound calling will be subject to the rates, terms and conditions for the PrimeXpress High Volume Inbound Calling Option, PrimeConnect, listed below. All end user equipment connecting to PrimeXpress Network Service must meet F.C.C. Part 68 requirements and be technically compatible with the parameters delineated herein. PrimeXpress Network Service is offered with the options of DTMF or MF signaling pulse and wink start or Immediate start trunk signaling.

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Customers who terminate a term commitment for a stand-alone PrimeXpress facility and purchase a PrimeXpress facility provisioned on a new or existing AT&T ACCU-Ring facility for a term equal or greater to the time remaining on their current PrimeXpress term commitment will not be liable for early termination charges.

PrimeConnect High Volume Inbound Calling Option- PrimeConnect

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Digital PrimeXpress Network Service can be configured to support high volumes of inbound calling. PrimeConnect is the High Volume Inbound Calling option that: 1) supports a maximum of two rate centers per DS1 facility or T1 trunk, 24 DS0's, within the TCG designated service area, 2) supports inbound calling only, 3) equals or exceeds an average call duration of 10 minutes per call, 4) equals or exceeds CCS loading of 32 CCS, and 5) equals or exceeds 200,000 MOU per month. The Customer will be charged rates for PrimeConnect Service. The Company reserves the right to audit the Customer's PrimeXpress usage for the above conditions.

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4.0 TCG NETWORK SERVICES (Cont'd.)

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1. PrimeXpress Network Service (Cont'd.)

PrimeConnect High Volume Inbound Calling Option- PrimeConnect
(Cont'd.)

The Customer is required to subscribe to a sufficient number of DS1 trunks at a maximum usage of 400,000 MOU so as to not degrade the TCG network below an incoming call completion rate of 99%. The call completion rate is based on an average of the busy hours occurring during the Customer's busiest hours during the billing cycle. Once the service has been established, the Company may require the Customer to increase the number of PrimeConnect trunks to satisfy the call completion criteria listed above.

A) PrimeConnect Customer Access requirements:

PrimeConnect supports inbound calling only, and does not include outbound calls to Operator Assisted Services, Special Service Codes, Special Access Codes or Carrier Access Codes. The Customer is responsible for securing individual business lines, or other appropriate facilities, to access these services and/or codes, including:

- Conference Calls,
- Calls to Special Service Codes including 500, 700, 900, 976, N11 (where N=2-9) or other special service codes that may be created, or
- Calls to 0 and 00

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PrimeConnect is intended solely for the purposes of providing local and intraLATA non-toll access into a Customer's location. In the event that local and intraLATA toll calls placed into or out of the PrimeConnect facility become subject to additional charges imposed by connecting carriers or by regulation, the Company reserves the right to modify the facility rate charges for traffic into the location upon 30 days written notice to the Customer. The Customer has the option to accept the rate changes(s) of terminate the contract without penalty, unless specifically bound to specific commitments associated with capital recovery, special construction, or other issues written into the Customer's contract or agreement with the Company over and above the normal terms and conditions of the contract or agreement.

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(M) Material moved from Price Sheet 72.1

4.0 TCG NETWORK SERVICES (Cont'd.)

PrimeXpress Network Service (Cont'd.)

(N)

Incoming Call Redirect Option

Incoming Call Redirect (ICR) provides automated redirection of incoming calls to a pre-designated back-up site during T1 or PBX failures or when all trunks are busy. This option is available with PrimeXpress Network Service, PrimePlex PRI Service or Prime Digital Trunk Service only.

ICR can redirect all or only pre-selected DID numbers, depending on the Customer's application. Calls are redirected to another set of telephone numbers (Destination Numbers), and can route to the LEC trunks at the same location or distant locations. A separate route index will be set up for the redirection of selected DID numbers. Redirected calls will route to a single number at the pre-designated back-up site, and will deliver the original calling number if the back-up site is configured for PRI and Calling Party Number. It is the responsibility of the Customer to obtain any necessary permissions for the use of any Destination Number.

If ICR is ordered in two or more sites that provide back up to one another, the back up telephone number cannot be a number which can be redirected.

ICR is limited to a maximum of ten simultaneous redirected calls per T1, a maximum of twenty four simultaneous calls for trunk groups of one to four T1's, and a maximum of forty eight simultaneous calls for trunk groups of five T1's or more. A maximum of two (2) trunk groups per location can be equipped with ICR.

Customers will be responsible for all usage charges associated with redirected calls.

1) Application of Rates

Incoming Call Redirect rates consist of a non-recurring and a monthly recurring charge per T1, a local usage charge per redirected call, and a nonrecurring charge per change or group of changes requested in a Customer's listing of Redirected Numbers or Destination Numbers.

(N)

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TCG Seattle
By: Leslie O. Buford, Tariff Administrator
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4.6 TCG PrimePlex PRI Service

4.6.1 General

TCG PrimePlex PRI service is an optional service arrangement for local exchange access based on the Primary Rate Interface (PRI) arrangement of the Integrated Services Digital Network (ISDN). PrimePlex PRI is a high capacity access path for communications providing voice or data transmission over the Company's exchange network. A PrimePlex PRI facility may be provided as stand-alone service or provisioned over an existing or new AT&T ACCU-Ring DS3 facility.

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4.6.2 Regulations

A) Explanation of Terms

Circuit Switching

A switching technique in which an entire circuit or, in a digital switch equipped for ISDN, a specific selection of time slots is dedicated to a given call.

PrimePlex Primary Rate Interface (PRI)

PrimePlex PRI is an alternative for individual local exchange access loop services such as Direct Inward Dialing (DID), Direct Outward Dialing (DOD), and business dial tone lines. It can also be used as loop transport for circuit switched data applications. PrimePlex PRI is provisioned on the 1.544 megabits per second (Mbps) bandwidth and uses ISDN architecture of 23 B or bearer channels and 1 D or data channel or 24 B channels to provide the Customer with the capabilities of simultaneous access, transmission, and switching of voice, data, and imaging services via channelized transport. In addition, PrimePlex PRI provides the Customer with the service capabilities and features described in Sections 4.6.2(C) and 4.6.2(E) following.

4.6 TCG PrimePlex PRI Service (Cont'd)

4.6.2 Regulations (Cont'd)

(N)

A) Explanation of Terms (Cont'd)

Integrated Services Digital Network

Integrated Services Digital Network (ISDN) describes the end-to-end digital telecommunications network architecture that provides for the simultaneous access, transmission, and switching of voice, data, and imaging services. These functions are provided via channelized transport facilities over a limited number of standard user-network interfaces. The ISDN architecture consists of digital switching systems that connect Primary Rate Interface lines to their serving central office.

Network Interfaces

ISDN Primary Rate Interface is comprised of a limited set of standard user-network interfaces. The PRI Customer Premises Equipment (CPE) located at the customer premises must be compatible with the network interface. This network interface is defined as follows:

Physically, the network interface is a metallic four-wire telephone loop interface between a switch equipped with ISDN and the Network Termination 2 (NT2). The NT2 is customer premises equipment required for providing physical compatibility in terminating telephone facilities at the customer premises.

(N)

4.6 TCG PrimePlex PRI Service (Cont'd.)

4.6.2 Regulations (Cont'd.)

(N)

A) Explanation of Terms (Cont'd.)

PRI Line Group

A PRI Line Group is a group of channels which are designated as one of the following:

- Incoming Business Dial Tone Line Group.
- Outgoing Business Dial Tone Line Group.
- Two-Way Business Dial Tone Line Group.
- Call-by-Call Service Selection Line Group.

Only one Call-by-Call line group may be provisioned on a PrimePlex PRI Arrangement. Where available, up to two of the other line group types may be provisioned on a PrimePlex PRI Arrangement. The total number of line groups per PRI Arrangement is limited to four. The capability to assign other than Call-by-Call line groups varies by central office switch type.

Primary Rate Access Facility

Primary Rate Access Facility provides a high capacity access path at a transmission speed of 1.544 megabits per second (Mbps) for communications between the Customer's premises and the serving central office. Each Primary Rate Access Facility supports one PrimePlex PRI arrangement.

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4.6 TCG PrimePlex PRI Service (Cont'd.)

4.6.2 Regulations (Cont'd.)

(N)

A) Explanation of Terms (Cont'd.)

Primary Rate Interface Arrangement

PrimePlex PRI Arrangement is a service providing ISDN capabilities between the customer premises and the serving central office. The PRI Arrangement consists of 23 B channels and one D channel or 24 B channels which are defined as follows:

B Channel

The B Channel is a 64 kilobits per second (Kbps) channel used for information transfer between users. The B channel may be used in conjunction with circuit-switched service.

D Channel

The D channel is a 64 kilobits per second (Kbps) channel that carries signaling and control for the B channels.

Software Defined Lines

Software Defined Lines are lines which are provisioned on the Primary Rate Access Facility by establishing their identity in central office translations. These lines physically ride on the 4-wire ISDN Primary Rate Access Facility.

Simulated Facility Group

A Simulated Facility Group is a software-defined register used to limit the number of simultaneous calls with specific attributes.

(N)

4.6 TCG PrimePlex PRI Service (Cont'd.)

4.6.2 Regulations (Cont'd.)

B) Customer Premise Equipment (CPE)

The CPE used by the customers subscribing to PrimePlex PRI must comply with ISDN Primary Rate Interface specifications as designated by the Telephone Company or Bellcore.

C) Service Capabilities

PrimePlex PRI provides the capability to:

1. Transport Customer information in the form of circuit switched voice or data up to 64 Kbps over any B channel.
2. Allow, where available, one D channel to control up to 20 PRI Arrangements. In such cases, a single D channel in one PRI Arrangement handles all the signaling and control requirements of multiple PRI Arrangements in a specific grouping, allowing supplemental PRI Arrangements to consist of 24 B channels.
3. Allow B channels to be allocated for specific services, such as Direct Inward Dialing (DID) and Direct Outward Dialing (DOD), or configure channels to access multiple services on a Call-by-Call basis. All of the preceding services may be accessed on a Call-by-Call Service Selection basis, except two way lines which must be dedicated to specific channels.
4. Allow the user to have access to the directory number of the calling party.

4.6.2 Regulations (Cont'd.)

D) Conditions

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This service is offered subject to the following conditions:

1. PrimePlex PRI is only available from serving central offices equipped with the necessary facilities to provide PRI service. Feature availability and service capabilities are dependent on the facilities and digital technology providing the service.
2. ISDN-compatible terminal equipment is required for operation. It is the Customer's responsibility to power and obtain such equipment.
3. PrimePlex PRI service does not preclude customers from originating or receiving circuit-switched voice calls from inside or outside either their serving central office or their Local Exchange Area. Where facilities are available, Customers will be able to originate and receive circuit-switched data calls outside of their serving central office.
4. This tariff does not provide for the transmission of packet data on the B or D channels. Packet data is not offered on the B or D channels.
5. Existing local usage or MTS rates apply to circuit-switched voice and data calls. The Unlimited Usage Package is not available with PrimePlex PRI service.
6. All PRI Arrangement configurations must have at least one 23B+D PRI Arrangement for signaling and control functions. A 23B+Backup D PRI Arrangement is required whenever more than 47 B channels are controlled by a single D channel.
7. When more than one TCG service is accessed over the same PrimePlex PRI Arrangement, Call-by-Call Service Selection may be required.

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TCG Seattle

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4.6 TCG PrimePlex PRI Service (Cont'd.)

4.6.2 Regulations (Cont'd.)

D) Conditions (Cont'd.)

- 8. Each line group is equipped with one telephone number. Additional numbers may be ordered in blocks of 10 as specified in Section 4.3(C) preceding.
- 9. Telephone numbers ordered in blocks of 20 from Section 4.2(B) preceding and Individual Additional Telephone Numbers ordered from this Tariff may not be delivered on the same Simulated Facility Group or dedicated trunk group.
- 10. The quantity of Individual Additional Telephone Numbers may not exceed the size of the trunk group or Simulated Facility Group to which they are assigned.
- 11. PrimePlex circuit-switched data PRI is intended only for data calls, including video.

PrimePlex PRI High Volume Inbound Calling Option- PrimeConnect PRI (N)

At the Company's discretion, the Company may reconfigure the Customer's service from PrimePlex PRI to PrimeConnect PRI Service if the Customer's PrimePlex PRI usage meets one or more of the following criteria: (1) supports a maximum of two rate centers per PRI facility or T1 trunk, 23B + 1D channel, within the TCG designated service area, 2) supports inbound calling only, (3) equals or exceeds an average call duration of 10 minutes per call, 4) equals or exceeds CCS loading of 32 CCS, and 5) equals or exceeds 200,000 minutes of use (MOU), per PRI, per month. The Customer will be charged rates for PrimeConnect PRI Service as listed below. The Company reserves the right to audit the Customer's PrimePlex PRI usage for the above conditions.

The Customer is required to subscribe to a sufficient number of DS1 trunks at a maximum usage of 400,000 MOU so as to not degrade the TCG network below an incoming call completion rate of 99%. The call completion rate is based on an average of the busy hours occurring during the Customer's busiest hours during the billing cycle. Once the service has been established, the Company may require the Customer to increase the number of PrimeConnect PRI trunks to satisfy the call completion criteria listed above.

4.6 TCG PrimePlex PRI Service (Cont'd.)

(N)

4.6.2 Regulations (Cont'd.)

PrimePlex PRI High Volume Inbound Calling Option- PrimeConnect PRI
(Cont'd.)

A. PrimeConnect PRI Customer Access Requirements:

PrimeConnect PRI supports inbound calling only, and does not include outbound calling to Operator Assisted Services, Special Service Codes, Special Access Codes or Carrier Access Codes. The Customer is responsible for securing individual business lines, or other appropriate facilities, to access these services and/or codes, including:

- Conference Calls,
- Calls to Special Service Codes including 500, 700, 900, 976, N11 (where N=2-9) or other special service codes that may be created, or
- Calls to 0 and 00

PrimeConnect PRI is intended solely for the purposes of providing local and intraLATA non-toll access into a Customer's location. In the event that local and intraLATA non-toll calls placed into a Customer's location become subject to additional charges imposed by connecting carriers or by regulation, the Company reserves the right to modify the facility rate charges for traffic into the location upon 30 days written notice to the Customer. The Customer has the option to accept the rate change(s) or terminate the contract without penalty, unless specifically bound to specific commitments associated with capital recovery, special construction, or other issues written into the Customer's contract or agreement with the Company over and above the normal terms and conditions of the contract or agreement.

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Fourth Revised Price Sheet 72.15

4.6 TCG PrimePlex PRI Service (Cont'd.)

4.6.2 Regulations (Cont'd)

E) Features

The following standard features are available with PrimePlex PRI:

1. Backup D Channel: Automatically takes over for a failed D channel in case of trouble. This is purchased as part of a 23B + Backup D PRI Arrangement.
2. Call-by-Call Service Selection (CBC): Provides an option to the Dedicated B Channel Configuration allowing B channels to be configured to access multiple services on a per-call basis. With this optional feature, separate facilities are not needed for individual services such as DID, DOD, and business dial tone lines. The customer premises equipment signals the local serving central office as to what type of service to access for each call.
3. Calling Party Number (CPN): Allows the user to have access to the directory number of the calling party. Provision of per-call and line blocking capabilities is a function of the customer premises equipment and is the responsibility of the customer.
4. Multiple Facility Signaling Control: Allows the D channel of one PRI Arrangement to provide signaling for up to 20 PRIs terminating on a switch module. Requires Backup D channel.
5. Original Called Number (OCN): which must be ordered for specific PRI ISDN trunks, places the callers original dialed digits into the OCN field of the selected ISDN message, for inbound calls which have been forwarded one or more times. These ISDN messages, containing OCN information, will be transmitted over the designed Data-Channels (D-Channels, primary, secondary, and back-up) on the ISDN trunk.
- 6) 2 B-Channel transfer on PRI: allows a controller that is interfaced over an ISDN PRI to initiate the transfer of one of its calls to another call so that the two end-users are connected to each other within the switch and the two PRI B-channels to the controller are released.
- 7) Caller ID With Name: this feature permits the display of a listed name associated with a telephone number from which the call is being made. The name and number will be delivered to a Customer- provided display device.

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Original Price Sheet 72.15.1

4.6 TCG PrimePlex PRI Service (Cont'd.)

Material on this page previously found on page 72.15

4.6.3 Rate Regulations

A) Application of Rates

1. Business dial tone line functionality is included in the PrimePlex PRI Service rates and charges.
2. When DID numbers are ordered from Section 4.2.2(H) preceding, a DID line connection service charge applies for each B channel dedicated to DID service, or DID-simulated facility group member over which DID numbers are transmitted.

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Second Revised Price Sheet 72.16

4.6 TCG PrimePlex PRI Service (Cont'd.)

4.6.3 Rate Regulations (Cont'd.)

A) Application of Rates (Cont'd.)

3. When a Customer converts existing DS1 facilities provided under PrimeXpress Service to PrimePlex Primary Rate ISDN Access Facilities, installation charges for the Primary Rate Access Facility are waived. (C)
4. Hunting Service is included in PrimePlex PRI rates.

B) Payment Options

A PrimePlex-PRI customer may select a month-to-month option (only available to current PrimePlex PRI month-to-month customers as of July 9, 1999), or a one, two, or three year contract. All PRI services and features at a given premises must be subscribed to the same payment option.

C) Additions to Service

During the contract period, the customer may add PRI services at the same monthly rate as specified in the initial contract. The contract period for these additional services will end coterminous with the initial contract.

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4.6 TCG PrimePlex PRI Service (Cont'd.)

4.6.3 Rate Regulations (Cont'd.)

D) Changes in Future Contract Rates

If the monthly rates on a contract are lowered, the subscriber may be allowed to cancel the existing contract without penalty, providing the subscriber signs up for a new contract of equal or greater monetary value. The subscriber will be subject to all terms, conditions, and prices of the new contract.

E) Renewal Options

Prior to the expiration of the existing contract period, a customer may extend the contract for another contract period without incurring termination liability charges. The new contract will indicate the designated rates then in effect. The new contract period must be for a period of time which is equal to or greater than the length of the original contract. The number of PRI arrangements must be equal to or greater than the number of arrangements contained in the original contract. The contract period effective date will be the date the customer signs the new contract.

Customers who terminate a term commitment for a stand-alone PrimePlex PRI facility and purchase a PrimePlex PRI facility provisioned on a new or existing AT&T ACCU-Ring facility for a term equal or greater to the time remaining on their current PrimePlex PRI term commitment will not be liable for early termination charges.

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4.6 TCG PrimePlex PRI Service (Cont'd.)

PrimeXpress Network Service (Cont'd.)

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Incoming Call Redirect Option

Incoming Call Redirect (ICR) provides automated redirection of incoming calls to a pre-designated back-up site during T1 or PBX failures or when all trunks are busy. This option is available with PrimeXpress Network Service, PrimePlex PRI Service or Prime Digital Trunk Service only.

ICR can redirect all or only pre-selected DID numbers, depending on the Customer's application. Calls are redirected to another set of telephone numbers (Destination Numbers), and can route to the LEC trunks at the same location or distant locations. A separate route index will be set up for the redirection of selected DID numbers. Redirected calls will route to a single number at the pre-designated back-up site, and will deliver the original calling number if the back-up site is configured for PRI and Calling Party Number. It is the responsibility of the Customer to obtain any necessary permissions for the use of any Destination Number.

If ICR is ordered in two or more sites that provide back up to one another, the back up telephone number cannot be a number which can be redirected.

ICR is limited to a maximum of ten simultaneous redirected calls per T1, a maximum of twenty four simultaneous calls for trunk groups of one to four T1's, and a maximum of forty eight simultaneous calls for trunk groups of five T1's or more. A maximum of two (2) trunk groups per location can be equipped with ICR.

Customers will be responsible for all usage charges associated with redirected calls.

1) Application of Rates

Incoming Call Redirect rates consist of a non-recurring and a monthly recurring charge per T1, a local usage charge per redirected call, and a nonrecurring charge per change or group of changes requested in a Customer's listing of Redirected Numbers or Destination Numbers.

(N)

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