

Washington
UT-093035
NCC 1-1

INTERVENOR: North County Communications

REQUEST NO: 1

Please provide copies of all written testimony provided by Renee Albersheim to other state regulatory commissions, including the previous testimony indicated at 2:19-3:4 of her testimony.

RESPONSE:

Objection: Qwest objects to this data request on the basis that it is overly broad and unduly burdensome to produce all written testimony ever provided by Ms. Albersheim, and further that the request seeks information which is not relevant to the disputed issues in this case, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of this objection, Qwest attaches copies of the testimony specifically referenced by Ms. Albersheim.

All public testimony for the Washington dockets directly identified in Ms. Albersheim's testimony is attached.

Respondent: Renee Albersheim

Washington
UT-093035
NCC 1-2

INTERVENOR: North County Communications

REQUEST NO: 2

Please provide copies of all written testimony provided by Philip Linse to other state regulatory commissions, including the previous testimony indicated at 2:10-15 of his testimony.

RESPONSE:

Objection: Qwest objects to this data request on the basis that it is overly broad and unduly burdensome to produce all written testimony ever provided by Mr. Linse, and further that the request seeks information which is not relevant to the disputed issues in this case, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of this objection, Qwest attaches copies of the testimony specifically referenced by Mr. Linse.

Respondent: Philip Linse

Washington
UT-093035
NCC 1-3

INTERVENOR: North County Communications

REQUEST NO: 3

Describe how Qwest was able to bill its customers or other carriers when Qwest (and/or its predecessors) had networks that were MF (multi-frequency).

RESPONSE:

Qwest assumes that NCC is asking how Qwest was able to bill its local exchange customers or other carriers when Qwest (and/or its predecessors) had networks that operated exclusively using MF (multi-frequency) trunk signaling. Qwest answers that when Qwest relied exclusively upon MF trunk signaling, there was no intercarrier compensation requirement for local or transit traffic. Thus, NCC's question can not be interpreted to assume the current application of post 1996 Act intercarrier compensation requirements. However, the same limitations of MF signaling existed when Qwest (and/or its predecessors) had networks that were exclusively MF as they do today. Qwest is able to bill its customers generally using flat rate service; however measured rate service is also available. The capability for Qwest to bill local exchange customers for measured rate service relies upon the recording capability of the switch and is determined by the line class code associated with the customer's service. As also explained on page 7 of Mr. Linse's testimony, Qwest was able to bill other carriers based upon the type of trunks e.g. Feature Group D ("FGD") prior to the 1996 Act. However, prior to the 1996 Act there was no reciprocal compensation requirement for local traffic thus, there was no need to separately bill for local traffic.

Respondent: Phil Linse

Washington
UT-093035
NCC 1-4

INTERVENOR: North County Communications

REQUEST NO: 4

State the last date that any of Qwest's networks used MF technology, and where that MF technology was used.

RESPONSE:

Qwest assumes NCC is asking the last date that Qwest operated a switch that relied exclusively upon MF signaled trunking. Qwest answers that the last switch that relied exclusively upon MF signaled trunking was upgraded to use SS7 on April 30, 2010 and was located in the small town of Westport, OR. In Washington, the last date was February 28, 2003 and was in the town of Bonney Lake.

Respondent: Phil Linse

Washington
UT-093035
NCC 1-5

INTERVENOR: North County Communications

REQUEST NO: 5

Describe how the proposed changes relating to MF signaling will effect the amount NCC receives for termination of Qwest's calls, with a description for Washington, Oregon and Arizona.

RESPONSE:

Qwest cannot provide a precise response to this question because Qwest does not know what the volume of traffic will be. The primary difference for Qwest will be that the traffic types will be explicit, and the amount will be for local traffic. The amount NCC receives will depend on whether the sum of the North County specific terminating minutes from other carriers (interexchange carriers, other CLECs, wireless providers, ILECs) and Qwest's exchange access minutes is greater or less than the minutes excluded from billing using the present billing methodology's factors.

Respondent: Renee Albersheim

Washington
UT-093035
NCC 1-6

INTERVENOR: North County Communications

REQUEST NO: 6

Provide an estimate of the percentage decrease in the amounts NCC will receive from Qwest as a result of the proposed changes relating to MF signaling, with a separate estimate for Washington, Oregon and Arizona.

RESPONSE:

Please see the response to data request #5.

Respondent: Renee Albersheim

Washington
UT-093035
NCC 1-7

INTERVENOR: North County Communications

REQUEST NO: 7

Provide an[d] estimate of the costs of a central office.

RESPONSE:

Qwest objects to this data request on the basis that the request seeks information which is not relevant to the disputed issues in this case, and is not reasonably calculated to lead to the discovery of admissible evidence. Neither Qwest nor NCC has placed the costs of a central office at issue in this case. Further, any contention by NCC that Qwest's position in this arbitration requires NCC to build a new central office is simply not credible because Qwest's proposed language allows continued use of MF signaling.

Respondent: Qwest Legal

Washington
UT-093035
NCC 1-8

INTERVENOR: North County Communications

REQUEST NO: 8

Provide and estimate of the lifespan of such a central office.

RESPONSE:

Objection: Qwest objects to this data request on the basis that the request seeks information which is not relevant to the disputed issues in this case, and is not reasonably calculated to lead to the discovery of admissible evidence. Neither Qwest nor NCC has placed the lifespan of a central office at issue in this case. Further, any contention by NCC that Qwest's position in this arbitration requires NCC to build a new central office is simply not credible because Qwest's proposed language allows continued use of MF signaling.

Respondent: Qwest Legal

Washington
UT-093035
NCC 1-9

INTERVENOR: North County Communications

REQUEST NO: 9

Provide an[d] estimate of the cost to convert a MF system to a SS7 system.

RESPONSE:

Objection: Qwest objects to this data request on the basis that the request seeks information which is not relevant to the disputed issues in this case, and is not reasonably calculated to lead to the discovery of admissible evidence. Qwest's proposal in this case does not require NCC to convert to SS7.

Respondent: Qwest Legal

Washington
UT-093035
NCC 1-10

INTERVENOR: North County Communications

REQUEST NO: 10

Describe any other billing disputes that have occurred between Qwest and NCC prior to the date of filing of Qwest's petition for arbitration.

RESPONSE:

The attached spreadsheet summarizes Qwest's disputes of bills received from NCC. From 2001 through 2008, Qwest has disputed 147 of 335 invoices received from NCC in three states. These disputes do NOT include the dispute described in the testimony of Renee Albersheim. The last invoice Qwest received from NCC was in July 2008.

Respondent: Renee Albersheim

Washington
UT-093035
NCC 1-11

INTERVENOR: North County Communications

REQUEST NO: 11

Provide the interconnection agreements for the 136 CLEC's referenced in the Albersheim Direct Testimony at 13:7-10, segregating the 87 that purportedly opted into the Qwest's Template language, the 34 that purportedly adopted negotiated agreements of other CLEC's, the 10 that negotiated agreements, and the 5 that arbitrated agreements.

RESPONSE:

Objection: Qwest objects to this data request on the basis that the information requested is public information, on file with the Washington Commission, and is as easily accessible by NCC as it would be to Qwest. The information is also voluminous, and it would be unduly burdensome to require Qwest to produce it. Alternatively, the documents are available for inspection, by appointment, in the office of Lisa Anderl, 1600 - 7th Ave., room 1506, Seattle, WA 98040. Please phone to schedule an appointment - 206-345-1574.

Without waiver of that objection, attached is a list of the CLECs who have contracts in each of the categories identified in Ms. Albersheim's testimony. All of these agreements were filed with the Washington Commission and are available to the public.

Respondent: Renee Albersheim and Qwest Legal

Washington
UT-093035
NCC 1-12

INTERVENOR: North County Communications

REQUEST NO: 12

State how many of these 136 CLEC's operate MF systems?

RESPONSE:

Qwest assumes this question is asking how many of the 136 CLECs interconnect with Qwest exclusively using MF trunk signaling. Qwest's answer is none.

Respondent: Renee Albersheim

Washington
UT-093035
NCC 1-13

INTERVENOR: North County Communications

REQUEST NO: 13

State the average decrease/increase in billing over the period of time since the relevant CLEC adopted new interconnection agreements over the year immediately prior to the adoption of the new agreements.

RESPONSE:

Objection: Qwest objects to this data request on the basis that the information requested is irrelevant to the issues in this docket, and the request is not reasonably calculated to lead to the discovery of admissible evidence.

Respondent: Qwest Legal

Washington
UT-093035
NCC 1-14

INTERVENOR: North County Communications

REQUEST NO: 14

State the actual percentage of traffic to Qwest's LIS trunks that originates from NCC compared to the amount that originates from Qwest.

RESPONSE:

Traffic that routes to NCC from Qwest is not exclusively Qwest-originated traffic. Jointly provided switched access and transit traffic is also routed to NCC from Qwest on LIS trunks. Qwest does not have actual percentages due to anomalies that may exist with MF-sigaled inter-machine trunking; however, Qwest and NCC manually reviewed the parties' respective individual LIS trunks and determined that NCC appeared to originate less than 1% of overall traffic on the LIS trunk groups.

Respondent: Phil Linse

Washington
UT-093035
NCC 1-15

INTERVENOR: North County Communications

REQUEST NO: 15

State whether Qwest believes that NCC has any VNXX traffic?

RESPONSE:

Yes. Qwest submitted VNXX-related disputes of NCC reciprocal compensation charges to Qwest in Washington associated with NCC's invoices for May 2007 through June 2008 usage. (The last reciprocal compensation invoice that NCC sent Qwest was in August 2008.)

Respondent: Nancy Batz

Washington
UT-093035
NCC 1-16

INTERVENOR: North County Communications

REQUEST NO: 16

Explain whether Qwest's Remote Call Forwarding service meets Qwest proposed definition of VNXX traffic.

RESPONSE:

Qwest's Remote Call Forwarding service, also known as Call Following, does not meet the definition of VNXX traffic because toll charges apply when calls are forwarded to numbers outside the local calling area.

Respondent: Renee Albersheim

Washington
UT-093035
NCC 1-17

INTERVENOR: North County Communications

REQUEST NO: 17

Describe how much Qwest will charge NCC for circuits under the proposed changes to the Interconnection Agreement.

RESPONSE:

Qwest's charges to NCC for Local Interconnection Service ("LIS") circuits will reflect the terms of the proposed ICA and rates in each ICA's Exhibit A. (Although, currently there are no LIS trunks interconnecting NCC and Qwest in Washington.) Depending on NCC's choice for how it interconnects with Qwest, Qwest's charges may include:

LIS Entrance Facilities Charges (See Section 7.3.1.1 of the proposed ICA). There are recurring and nonrecurring Entrance Facility rates reflected in Exhibit A. The size of the LIS trunk group determines which rates apply. Per Section 7.3.1.1. of the proposed ICA, recurring Entrance Facilities charges are subject to the relative use factor (RUF). Exhibit H of the proposed ICA provides the methodology for calculating the RUF. Per Section 7.3.3., Trunk Nonrecurring charges, the RUF does not apply to any nonrecurring Entrance Facility Charges for either installation or disconnection.

LIS Direct Trunked Transport Charges (See Section 7.3.2. of the proposed ICA). There are recurring Direct Trunked Transport rates reflected in Exhibit A. The size of the LIS trunk group, i.e. DS1 or DS3, determines which rates apply. Direct Trunked Transport rates are distance sensitive and include fixed and per-mile rates. Per Section 7.3.2. of the proposed ICA, recurring Direct Trunked Transport charges are subject to the relative use factor (RUF). Exhibit H of the proposed ICA provides the methodology for calculating the RUF.

Trunk Nonrecurring Charges (See Section 7.3.3. of the proposed ICA). There are Trunk Nonrecurring rates reflected in Exhibit A. Per Section 7.3.3., Trunk Nonrecurring charges, the RUF does not apply to nonrecurring Trunk charges for either installation or disconnection.

LIS Multiplexing Charges (See Section 7.3.2.3 of the proposed ICA). There are recurring and nonrecurring Multiplexing rates reflected in Exhibit A. The type of multiplexing, i.e. DS1 to DS0 or DS3 to DS1, determines the applicable rates. Neither the recurring or nonrecurring multiplexing charges are subject to the RUF per Section 7.3.2.3 of the proposed ICA.

Respondent: Nancy Batz

Washington
UT-093035
NCC 1-18

INTERVENOR: North County Communications

REQUEST NO: 18

State the names of the ILEC's that connect up to Qwest using MF.

RESPONSE:

Objection: Qwest objects to this data request on the basis that the information requested is irrelevant to the issues in this docket, and the request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of this objection, Qwest states that whether ILECs interconnect with Qwest using MF signaling should not impact the decision on any disputed issues in this case, since Qwest's proposal allows NCC to use MF signaling as well.

Qwest assumes that NCC is requesting the names of the ILECs that interconnect with Qwest exclusively using MF signaled trunking. Qwest answers that [CONFIDENTIAL] is the only one of approximately 20 ILECs in the state of Washington that exclusively uses MF trunk signaling with Qwest. Further, their traffic generation is limited to less than [CONFIDENTIAL] of NCC's interconnected capacity with Qwest.

Respondent: Nancy Batz and Qwest Legal

Washington
UT-093035
NCC 1-19

INTERVENOR: North County Communications

REQUEST NO: 19

Please provide copies of all agreements Qwest has to purchase any other company's CNAM data.

RESPONSE:

Objection: Qwest objects to this data request on the basis that the information requested is irrelevant to the issues in this docket, and the request is not reasonably calculated to lead to the discovery of admissible evidence.

Respondent: Qwest Legal

Washington
UT-093035
NCC 1-20

INTERVENOR: North County Communications

REQUEST NO: 20

Please list the reasons why Qwest refuses to purchase NCC's CNAM data under the same terms and conditions that NCC agrees to purchase Qwest's CNAM data.

RESPONSE:

Qwest generally makes such decision based upon its business needs. First, based upon NCC's claim that traffic is almost entirely one-way from Qwest to NCC there appears to be no business need to enter into such an agreement with NCC, since NCC does not seem to be serving any end users who call Qwest's end users. Second, CNAM data is queried using SS7, however, NCC has MF and does not have SS7 interconnection with Qwest thus, there appears to be no technical need to enter into such an agreement with NCC. To the extent that NCC is sending traffic to Qwest where Qwest is unaware of such traffic, Qwest expects that NCC should disclose this so that Qwest may bill NCC for such traffic. Qwest may also reevaluate its business/technical need to enter into a CNAM agreement with NCC. Qwest is under no obligation to purchase CNAM service from NCC, especially in those instances when NCC is not serving the customer as a LEC.

Respondent: Qwest Legal

Washington
UT-093035
NCC 1-21

INTERVENOR: North County Communications

REQUEST NO: 21

State the reason why Qwest cannot track minutes to NCC when it is able to track of all transit traffic to NCC and traffic from IXC's to NCC.

RESPONSE:

Qwest assumes that NCC is asking why Qwest can not track the minutes associated with traffic over the MF signaled LIS trunks destined to NCC when Qwest is able to track all transit traffic destined for NCC and traffic from IXC's to NCC. Qwest answers that it records transit traffic based upon SS7 connections for the purposes of billing transit charges to those other carriers, similarly, Qwest records IXC traffic for the purpose of billing IXCs. NCC employs MF LIS trunking with Qwest. Thus, Qwest does not track the traffic over MF signaled trunks with NCC in a way that segregates transit, Intrastate, Interstate, or Qwest originated local traffic. Qwest's proposed language agrees that Qwest will manually manipulate the SS7 transit information that Qwest records for other carriers in an attempt to assist NCC with appropriately billing Qwest for Qwest originated traffic. Although this method is an improvement over the existing arrangement it is less accurate than if NCC interconnected using SS7 trunking.

Respondent: Phil Linse