

DATA REQUESTS

1. Identify all specific services offered by Focal to ISP that serve end user customers in Washington. Provide a narrative description of each such service.

RESPONSE:

Broadwing objects to this Request as Not Relevant and Unduly Burdensome because, among other items, the information is publicly available. Without waiving this objection, Broadwing states that all of the services that Broadwing offers to business customers in Washington are available to ISPs if they meet the service eligibility criteria. Broadwing also provides the following product description of its Multiple Exchange (MX) service.

Multiple Exchange (MX) is an inbound-only, intraLATA foreign exchange service that allow customers to expand its inbound local calling area to other rate centers within a LATA. Multiple Exchange allows customers to select local coverage in a single rate center up to all Broadwing-served rate centers within a LATA. MX terminates incoming telephone calls from across the LATA onto Broadwing facilities. When a call is placed to an MX number, the caller's local carrier will bill the caller based on the rate center assigned to the MX number. Therefore, if a caller dials a MX number assigned to another rate center, the caller may be billed for intraLATA toll. MX may be intermixed with regular T1/PRI DIOD local voice service. Customers can request multiple MX telephone numbers within each rate center (to allow simultaneous calls) and can provision these numbers as Direct Inward Dial (DID) or as a hunt group. When provisioned as a hunt group, only one telephone number needs to be published to end-users. When the primary telephone number is busy, the call will hunt to the other MX numbers.

Prepared by: Sam Koetter, Sr. Product Manager

Date: September 11, 2006

2. Does Focal provide a service or services in Washington for ISPs (e.g., AOL, Earthlink, MSN, or other smaller local or regional ISPs serving Washington customers) whereby Focal provides *any* of the following service components related to dial-up Internet access: (1) local telephone numbers for your ISP customers to provide to their end users for access to the Internet; (2) transport from the local calling area ("LCA") (as defined by the WUTC) of the ISP end user customer to the point of points of interconnection ("POIs") of Focal in Washington; (3) authentication of the calling party on behalf of your ISP customer; or (4) the provision of the initial modem functionality on behalf of the ISP customer(s) whereby the protocol conversion between the analog, time division multiplexing ("TDM") signals sent by the ISP end user are converted to Internet Protocol ("IP") (and vice versa) in order to allow the ISP's end user access to and the ability to communicate with the Internet. If Focal provides any such components:

- a. Identify each component of each such service offered by Focal to ISPs that provide service to Washington customers.
- b. Identify all components of the service or services that provide telecommunications functionalities to ISPs. For each such component, identify the terms and conditions, including price, under which such services are offered or provided in Washington.
- c. Identify by web page address and name of service all web pages of your company's website that describe such services offered by you.

RESPONSE:

In addition to its general objections, Broadwing objects to this Request as Unduly Burdensome, Vague and Ambiguous. Without waiving these objections, Broadwing provides the following responses:

(a) Broadwing's MX service (1) provides telephone numbers to ISP customers, and (2) transport from the LCA of the ISP's end user customer (the calling party) through the Broadwing switch to the ISP's location, which in certain cases may be in a Broadwing collocation facility located adjacent to a Broadwing switch in Washington.

(b) The component parts of the MX service are as follows: (1) port (NRC, \$400; MRC, \$335); (2) DID numbers (NRC, \$2.00; MRC, \$0.15); local loop, if ISP customer is not collocated with Broadwing (price varies depending on location). The terms and conditions of

the MX service are contained in a Broadwing Service Supplement attached hereto numbered

DR 2-1 to DR 2-2.

(c) None.

Prepared by: Sam Koetter, Sr. Product Manager

Date: September 11, 2006

3. If Focal obtains local telephone numbers from NANPA in Washington that are provided to ISPs, identify all specific NPA/NXXs obtained by Focal where some or all of the numbers related to that specific NPA/NXX are provided to ISPs.

RESPONSE:

In addition to its general objections, Broadwing objects to this Request as Vague and Ambiguous and Not Relevant. Without waiving these objections, Broadwing responds that it does not necessarily know whether a specific customer is an ISP. Notwithstanding this limitation, to the best of its knowledge, Broadwing identifies and produces the documents attached to this response numbered DR 3-1 to DR 3-3 which list the NPA NXX's that include telephone numbers assigned to ISP customers of Broadwing in Washington. These documents are confidential and proprietary and must be protected in accordance with the Protective Order in this proceeding.

Prepared by: Sam Koetter, Sr. Product Manager
Date: September 11, 2006

5. Is Focal an interexchange carrier that provides intra- or interLATA interexchange services for Washington end user customers. If so, please identify if Focal provides such services to Washington customers, and identify each entity that provides such services.

RESPONSE:

Yes. Broadwing Communications LLC provides such services to customers in Washington.

Prepared by: Sam Koetter, Sr. Product Manager
Date: September 11, 2006

6. Excluding calls to ISPs, does Focal provide a service or services to Washington end users that allows such end users (whether Qwest end users or end users of Focal) to originate calls to a number associated with the same LCA as the NPA/NXX as the calling party (*i.e.*, to a telephone number that does not require 1+ dialing and that appears to the calling party to be a local call to a local telephone number), but where the called party is actually located in a LCA (as defined by the WUTC) different from the LCA with which the number called is associate? If so, please:

- a. identify each such service (and provide the tariff, price list, and web page where such service is described);
- b. provide a narrative description of the elements of each such service;
- c. identify which party (the calling party, the called party, or some other party) pays Focal for such service;
- d. describe how such service is priced to the party that pays for the service (flat-rate, usage sensitive, or some other manner);
- e. identify whether Focal bills Qwest reciprocal compensation for such traffic and at what rate; and
- f. whether Focal pays Qwest any intrastate or interstate access charges for the origination, transport, or termination of such traffic. If so, identify all specific access charge elements paid by Focal to other companies with regard to such service.

RESPONSE:

In addition to its general objections, Broadwing objects to this Request as Vague and Ambiguous, Not Relevant, and Unduly Burdensome because, among other items, the information is publicly available. Without waiving this objection, Broadwing offers Virtual Office (VO) and Virtual Exchange (VX) services in addition to the Multiple Exchange service. Product descriptions of the VO and VX services are provided in subpart (b) below.

- (a) See product descriptions provided in (b).
- (b) Virtual Office (VO) and Virtual Exchange (VX) are both inbound-only, intraLATA foreign exchange services that allow customers to expand their inbound local

calling area to other rate centers within a LATA. Virtual Office provides a local presence in all Broadwing-served rate centers within a LATA, and Virtual Exchange provides a local presence in select rate centers within a LATA. Virtual Exchange provides a less expensive, a-la-carte option for customers that require coverage in less than 8-10 rate centers. VO/VX terminates incoming telephone numbers from across the LATA onto Broadwing facilities. When a call is placed to a VO/VX number, the caller's local carrier will bill the caller based on the rate center assigned to the VO/VX number. Therefore, if a caller dials a VO/VX number assigned to another rate center, the caller may be billed for intraLATA toll. Outbound service on VO/VX trunks is not available. Customers can request multiple VO/VX telephone numbers within each rate center (to allow simultaneous calls) and can provision these numbers as Direct Inward Dial (DID) or as a hunt group. When provisioned as a hunt group, only one telephone number needs to be published to end-users. When the primary telephone number is busy, the call will hunt to the other VO/VX numbers.

(c) Broadwing cannot answer this question because of its compound nature. When a Broadwing customer purchases one of the services listed above, the Broadwing customer pays Broadwing for the service.

(d) The service is priced on a flat rate basis.

(e) When a locally-dialed call originated by a Qwest customer terminates to one of Broadwing's customers, Broadwing bills Qwest reciprocal compensation for terminating such calls. The reciprocal compensation rates currently in effect in Washington are \$.005416 for traffic under 3:1 and \$.0007 for traffic above 3:1.

(f) Broadwing cannot answer this question because it does not know whether or

when Qwest bills Broadwing access charges for such calls.

Prepared by: Sam Koetter, Sr. Product Manager
Date: September 11, 2006

2. Admit that in Washington Focal provides local telephone numbers to its ISP customers, and that such ISP customers provide to their end user customers to obtain access to the Internet through their ISP.

RESPONSE:

Denied. Broadwing does not understand the meaning of the term “local” as used in this context. Broadwing assigns telephone numbers to its ISP customers. Broadwing’s ISP customers are the end users of the telephone numbering resources assigned by Broadwing.

Prepared by: Sam Koetter, Sr. Product Manager

Date: September 11, 2006

14. Does Broadwing offer Foreign Exchange (FX) service to its customers in Washington? If so:

a. For each Washington local calling area in which Qwest provides local exchange service and in which Broadwing provides its FX service, state whether Broadwing compensates Qwest for the use of Qwest's network facilities (such as local loops and switching) within that local exchange over which traffic originated by Qwest customers is routed by Broadwing to its customers physically located in a different local calling area. If Broadwing claims that it compensates Qwest for such local network facilities, describe the compensation mechanism and the amount of compensation.

b. Describe the specific manner in which Broadwing transports its FX service traffic from the originating local calling area to the local calling area in which Broadwing's customer is physically located.

c. Does Broadwing use Qwest facilities to transport some or all of Broadwing's FX traffic from one local calling area to another local calling area in Washington? If so:

1. Does Broadwing purchase any of the transport from Qwest at interstate private line rates?

2. Does Broadwing purchase any of the transport from Qwest at intrastate private line rates?

3. Does Broadwing purchase any of the transport from Qwest at TELRIC-priced local interconnection service (LIS) transport (such as direct trunked transport)?

4. Does Broadwing purchase any of the transport from Qwest on any other basis not identified above. If so, describe the type of transport purchased by Broadwing?

d. Does Broadwing use the transport facilities of an ILEC or CLEC other than Qwest to transport some or all of Broadwing's FX traffic from one local calling area to another local calling area in Washington? If so:

1. Does Broadwing purchase any of the transport from other ILECs or CLECs at interstate private line rates?

2. Does Broadwing purchase any of the transport from other ILECs or CLECs at intrastate private line rates?

3. Does Broadwing purchase any of the transport from other ILECs or CLECs at TELRIC-priced local interconnection service (LIS) transport (such as direct trunked transport)?
4. Does Broadwing purchase any of the transport from other ILECs or CLECs on any other basis not identified above. If so, describe the type of transport purchased by Broadwing?
- e. Provide all documents, including written tariffs, price lists, customer agreements (or any other written documents), wherein Broadwing states the terms and conditions of Broadwing's FX service in Washington.

RESPONSE:

In addition to its General Objections, Broadwing objects to this Request and its subparts as Vague and Ambiguous, Unduly Burdensome, and Overly Broad, and because it requests Commercially Sensitive, Proprietary, and Confidential Information and Calls for Legal Conclusions. Without waiving these objections, Broadwing responds as follows:

- (a) Broadwing does not provide a service named "FX" but rather provides Multiple Exchange ("MX") service, Virtual Office ("VO") service, and Virtual Exchange ("VX") service as described in Broadwing's responses to Qwest's Data Requests Nos. 1, 2, and 6.
- (b) As stated above, Broadwing does not provide a service named "FX." In addition to its General Objections and the Specific Objections above, Broadwing objects to this subpart of the Request because the term "FX traffic" is Vague and Ambiguous. Without waiving its Objections, Broadwing responds that it has established transport to pick up Qwest-originated traffic in each local calling area where Broadwing exchanges locally-dialed traffic with Qwest.
- (c) In addition to its General Objections and the Specific Objections above, Broadwing objects to this subpart of the Request because the term "FX traffic" is Vague and Ambiguous and Broadwing does not maintain the data requested in the normal course of its business. As

stated above, Broadwing does not provide a service named "FX."

Without waiving its Objections, Broadwing responds that it has established transport to pick up Qwest-originated traffic in each local calling area where Broadwing exchanges locally-dialed traffic with Qwest. Broadwing purchases Qwest facilities and other carriers' facilities to transport its 251(b)(5) and other types of traffic. Qwest invoices Broadwing each month for the services that Qwest provides to Broadwing and is in possession of the requested information.

(d) In addition to its General Objections and the Specific Objections above, Broadwing objects to this subpart of the Request because the term "FX traffic" is Vague and Ambiguous and Broadwing does not maintain the data requested in the normal course of its business. As stated above, Broadwing does not provide a service named "FX." Without waiving its Objections, Broadwing responds that it has established transport to pick up Qwest-originated traffic in each local calling area where Broadwing exchanges locally-dialed traffic with Qwest. Broadwing purchases Qwest facilities and other carriers' facilities to transport its 251(b)(5) and other types of traffic. Broadwing is attempting to determine more information regarding the transport facilities it purchases from providers other than Qwest and will supplement these Responses if appropriate.

(e) As stated above, Broadwing does not provide a service named "FX." Without waiving its Objections, Broadwing responds that the terms and conditions of its MX service were provided in response to Qwest's DR2. Broadwing's tariffed and published terms and rates for MX and other functionally similar services are publicly available to Qwest.

Prepared by: Scott Kell, Vice President Voice Operations

Date: September 25, 2006

22. Does Broadwing provide a service to ISPs whereby an end user Qwest who is also an ISP customer served by Broadwing calls a number that appears local to calling customer (i.e., he or she does not need to dial 1+) but which Broadwing delivers to an ISP whose equipment (such as modems and servers) are located in a local calling area different from the local calling area of the calling party? If so:

- a. What is the name of the service or services provided by Broadwing, and provide all advertising, marketing, tariff materials, or any other written materials (including material provided on the Internet) that describe that service.
- b. Are such calls handed off to an interexchange carrier (IXC) for completion to the ISP? If not, why not?
- c. Are originating access charges paid to Qwest for such a call? If not, why not?
- d. Does Broadwing include such traffic in its billings to Qwest for terminating compensation (reciprocal compensation)? If so, what rate does Broadwing charge Qwest to terminate such traffic.

RESPONSE:

In addition to its General Objections, Broadwing objects to this Request and its subparts as Vague and Ambiguous and because it Calls for Legal Conclusions to the extent that it seeks information regarding calls that in Qwest's words "appears local to the calling customer." Further, Broadwing objects to this Request because it is Unduly Burdensome as Broadwing does not maintain the data sought in the normal course of business. For example, Broadwing does not track the physical location of its customers' equipment in the normal course of business and such knowledge is presumed by the request.

Without waiving these objections, Broadwing responds as follows:

- a. Broadwing provides Multiple Exchange ("MX") service, Virtual Office ("VO") service, and Virtual Exchange ("VX") service as described in Broadwing's responses to Qwest's Data Requests Nos. 1, 2, and 6. The terms and conditions of its MX service were provided in

response to Qwest's DR2. Broadwing's tariffed and/or published terms and rates for MX services are publicly available to Qwest. Without waiving any of its objections, Broadwing responds that advertising, marketing and tariff provisions regarding Broadwing's MX, VO and VX services are attached hereto numbered DR 21-1 to DR 21-3, and DR 20-1.

b. Without waiving its Objections, Broadwing responds that it does not hand off ISP bound traffic to an IXC. The remainder of Qwest's question calls for Legal Conclusions and legal argument to which no answer is required. Broadwing will address these issues as appropriate in legal arguments during this proceeding.

c. Without waiving its Objections, Broadwing responds that originating access charges are not owed on such traffic. The remainder of Qwest's question calls for Legal Conclusions and legal argument to which no answer is required. Broadwing will address these issues as appropriate in legal arguments during this proceeding.

d. Yes, pursuant to the terms and conditions contained in the interconnection agreement between Broadwing and Qwest. Broadwing charges the rates contained in the interconnection agreement for intercarrier compensation which varies depending upon whether the minutes of traffic between the two companies is in balance (below 3 to 1) or deemed out of balance (above 3 to 1). The below 3 to 1 rate is 0.005416 and the above 3 to 1 rate is 0.0007.

Prepared by: Scott Kell, Vice President Voice Operations, Sam Koetter, Sr. Product Manager and Counsel

Date: October 31, 2006

25. In response to Data Request No. 14, Broadwing states in its response to subpart (b) that "Broadwing responds that it has established transport to pick up Qwest-originated traffic in each local calling area where Broadwing exchanges locally-dialed traffic." With regard to that response, please respond to the following clarifying questions:

- a. Is any of the "transport" referred to in Broadwing's response transport provided by Qwest? If so, is any of it provided as LIS services under the Broadwing/Qwest interconnection agreement? If so, please identify each such transport link that is provided as a LIS service under the interconnection agreement.
- b. Is any of the "transport" referred to in Broadwing's response transport provided by Qwest? If so, is any of it provided as private line services under either Qwest's Washington private tariff or Qwest's interstate access tariff? If so, please identify each transport circuit that is provided as a private line circuit under Qwest's intrastate private line tariff or Qwest's federal access tariff.
- c. Is any of the "transport" referred to in Broadwing's response either self-provisioned by Broadwing or purchased from providers other than Qwest?
- d. Please define the term "locally-dialed traffic" as used in the answer.
- e. Please explain how Broadwing distinguished "locally-dialed traffic" from "local traffic."

RESPONSE:

a. In addition to its General Objections, Broadwing objects to this subpart of the Request because Broadwing does not maintain the data in the normal course of its business. Further, Qwest invoices Broadwing each month for the services that Qwest provides to Broadwing and is in possession of the requested information.

Without waiving these objections, Broadwing responds that some of the transport is obtained from Qwest. However, Broadwing does not use Qwest's LIS service for this transport. A list of the transport obtained by Broadwing from Qwest to central offices in Washington is attached hereto numbered DR 25-1.

b. In addition to its General Objections, Broadwing objects to this subpart of the

Request because Broadwing does not maintain the data in the normal course of its business. Further, Qwest invoices Broadwing each month for the services that Qwest provides to Broadwing and is in possession of the requested information. Broadwing further objects to this request as Vague and Ambiguous because the term "private line services" is not defined.

Without waiving these objections, Broadwing responds that it obtains transport from Qwest's interstate access tariff FCC No. 1. A list of the transport obtained by Broadwing from Qwest to central offices in Washington is attached hereto numbered DR 25-1. In addition to the transport listed in DR 25-1, Broadwing obtains a circuit from Qwest from Broadwing's switch in Washington to STTLWAHNWAA.

c. In addition to its General Objections, Broadwing objects to this subpart of the Request because Broadwing does not maintain the data in the normal course of its business. Without waiving its objections, Broadwing responds that it obtains some of the transport from third parties.

d. In addition to its General Objections, Broadwing objects to this subpart of the Request because it is Vague and Ambiguous. Without waiving its objection, Broadwing responds that Locally-dialed Traffic means communications traffic that originates from a user located in a local calling area or Extended Area Service ("EAS") area of Qwest or Broadwing and is dialed using a called party number or destination number that has an NPA-NXX that is associated with a rate center that is within the local calling area or EAS from which the call originated.

e. In addition to its General Objections, Broadwing objects to this subpart of the Request because it is Vague and Ambiguous and Calls for a Legal Conclusion.

Prepared by: Scott Kell, Vice President Voice Operations and Counsel

Date: October 31, 2006

Broadwing Communications LLC
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SECTION 5 – LOCAL EXCHANGE SERVICE

5.9 Inbound Digital DID Service From Multiple Rate Centers

Inbound Digital DID Service From Multiple Rate Centers is designed for high volumes of inbound only calling. A minimum order of 24 lines is required. This service will support all rate centers per facility or trunk group within The Company's designated service areas.

Customers may choose to have Inbound Digital DID Service from Multiple Rate Centers equipped with ISDN Primary Rate Interface (PRI).

Monthly recurring rates per T1 apply as follows:

#T-1s	Digital DID		ISDN PRI	
	1 YR	2 YR	1 YR	2 YR
1 – 3	\$1,158	1,042	\$1,158	1,042
4 – 6	1,042	926	1,042	926
7 – 11	984	868	984	868
12 – 18	926	810	926	810
19 – 27	868	753	868	753
28 +	810	695	810	695

Rates if co-located:

	<u>Flat Rate</u>		<u>Measured Rate</u>	
	1 YR	2 YR	1 YR	2 YR
1 – 6	\$600	\$575	\$420	\$403
7 – 18	\$575	\$550	\$403	\$385
19 – 27	\$550	\$525	\$385	\$368
28+	\$525	\$500	\$368	\$350

Other rates per T1 apply as follows:

<u>Other Charges</u>	<u>Monthly Recurring</u>	<u>Non-Recurring</u>
Digital T1 & PRI Installation Charges	N/A	\$150.00
Re-Programming Charge	N/A	\$500.00
DID numbers (charge per number)	\$0.02	\$2.50

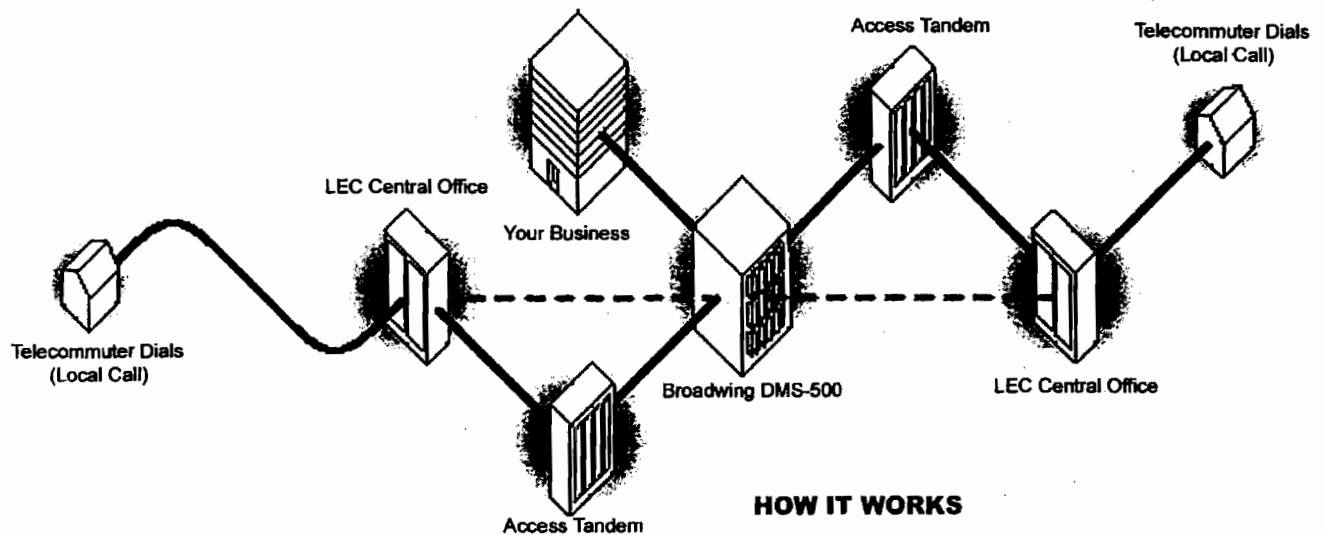
Issued: September 20, 2004

Effective: September 30, 2004

Issued By: Broadwing Communications LLC
 Daniel E Meldazis, Director Regulatory Affairs

Virtual OfficeSM Service

Broadwing's Virtual OfficeSM telecommuting service provides a revolutionary way to significantly reduce work-at-home costs and maximize efficiency.



HOW IT WORKS

Your employee dials a local Broadwing telephone number using their residential telephone service. The local company routes the call to Broadwing's office. Broadwing routes the call over the DIDT1 setup between Broadwing's switch and your server.

► A better way to work.

Virtual Office is an Inbound application designed for any business whose employees telecommute. With more employees than ever working from home, Broadwing's Virtual Office provides a timely way to significantly reduce work-at-home costs for your company. Previously, allowing employees to telecommute meant soaring costs from giving employees access to voicemail or office servers via toll-free numbers, long-distance calls or IntraLATA toll calls.

Broadwing Virtual Office eliminates toll-free and long-distance charges by giving your business local telephone numbers throughout the service area. Your employees simply pay for a local call on their residential phone bill. All calls are routed through our switch and delivered via your Broadwing Inbound T1 service. Plus by using our customizable 'finder' software application, the telecommuter is certain to know which DID number is closest to them.

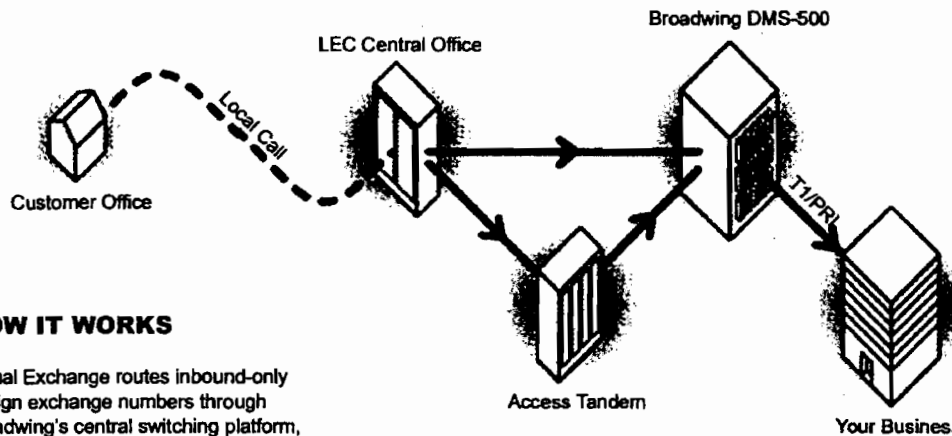


1.800.BROADWING

www.broadwing.com

Virtual Exchange Service

Broadwing Virtual Exchange™ foreign exchange service lets customers, vendors and remote offices reach you from anywhere within the LATA by using a local number – simplifying your communications, reducing your costs and expanding your presences while providing enhanced service to your customers.



HOW IT WORKS

Virtual Exchange routes inbound-only foreign exchange numbers through Broadwing's central switching platform, then on to your location over a multi-purpose T1.

► Expand your presence.

As a replacement for traditional foreign exchange (FX) service, Broadwing Virtual Exchange (VX) allows you to provide customers, vendors and associates with a local number to contact you. Providing your business a greater local presence and improved customer care. All you have to do is choose the available rate centers you want local numbers in.

► Improve your bottom line.

Virtual Exchange can also be used to improve your bottom line by reducing costs. Not only can it help replace costly local toll calling between company locations, it can also eliminate the need for local 800 calling applications and reduce access costs.

► Solutions made simple.

Broadwing designs all of its products around the needs of our customers. Virtual Exchange can be added to any of our inbound local calling products including DID and PRI services. And since all of your telephone numbers can terminate on the same access facility, your local network is easier to optimize and control – maximizing your network costs.

Virtual Exchange can be added to existing Broadwing service and uses fixed monthly pricing to eliminate the guesswork associated with other usage-based offerings.



Broadwing Communications LLC
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SECTION 5 – LOCAL EXCHANGE SERVICE

5.10 Virtual Exchange Service

5.10.1 Description

Virtual Exchange is an inbound foreign exchange (FX) service. The Company assigns telephone numbers (NPA-NXX-XXXX) from a foreign rate center outside the subscriber's geographic exchange area. Virtual Exchange service must terminate on Company provided DID, DIOD, 2-way or ISDN PRI access facilities.

Virtual Exchange customers must subscribe to Company DID, DIOD, 2-way or ISDN PRI service and maintain a BTN (Billing Telephone Number) from within their home rate center. Virtual Exchange service is an inbound only feature. All outbound calls originated from a Virtual Exchange customer will be charged at applicable usage rates based upon the customer's home rate center. Virtual Exchange numbers are available only from existing Company service areas as defined in this tariff. Measured local rates as listed in Section 8.3.1.2 will apply. IntraLATA toll calls will be charged per Section 8.3.2.

5.10.2 Rates

	<u>Monthly Recurring Charge</u>	<u>Non-Recurring Charge</u>
Rate Center Charge	\$50.00	\$150.00
DID Numbers (charge per number)	\$ 0.15	\$1.00

# of T1's	1 Year Term	2 Year Term
1 - 3	\$1,158	\$1,042
4 - 6	\$1,042	\$ 926
7-11	\$ 984	\$ 868
12 - 18	\$ 926	\$ 810
19 - 27	\$ 868	\$ 753
28 +	\$ 810	\$ 695

Issued: September 20, 2004

Effective: September 30, 2004

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