ELECTRIC LIGHTWAVE

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September 11, 2006

Ms. Lisa Anderl
Qwest
1600 7th Ave, Room 3206
Seattle, WA 98191-0001

Re: UT-063038 Responses to Data Requests

Dear Lisa,

Enclosed are ELI's responses to Qwest's First Set of Data Requests and Requests for Admission. Please give me a call if you have questions.

Very truly yours,

Charles L. Best
Associate General Counsel

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

QWEST CORPORATION, Complainant, v. LEVEL 3 COMMUNICATIONS, LLC; PAC-WEST TELECOMM, INC.; NORTHWEST TELEPHONE INC.; TCG-SEATTLE; ELECTRIC LIGHTWAVE, INC.; ADVANCED TELCOM GROUP, INC. D/B/A ESCHELON TELECOM, INC.; FOCAL COMMUNICATIONS CORPORATION; GLOBAL CROSSING LOCAL SERVICES INC; AND, MCI WORLDCOM COMMUNICATIONS, INC.	DOCKET NO. UT-063038 ELI"S RESPONSES TO QWEST'S FIRST SET OF DATA REQUESTS AND REQUESTS FOR ADMISSION

DATA REQUESTS

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

Response:

ELI objects to this request as irrelevant, overbroad and unduly burdensome. The question has no apparent relationship to the VNXX issue. Without waiving its objections, ELI responds as follows: RSVP (Remote Systems Virtual Portal) Description: RSVP is a wholesale dialup access product to allow our customers to use or lease dialup facilities to reach the internet. RSVP requires that the customer maintain their own RADIUS service and/or database.

Other than RSVP we have no ISP specific products. All ELI products are available to ISPs.

Respondent: Geoffrey Williams

Objection: Charles Best

Date: 9/11/06

2. Does ELI 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 ELI 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 ELI 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 ELI provides any such components:

a. Identify each component of each such service offered by ELI 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:

ELI objects to this request as irrelevant, overbroad and unduly burdensome. Without waiving its objections, ELI responds as follows:

1) We assign numbers for our ISP customers
   a) There are no particular components associated with ISP number assignment.
   b) There are no particular components associated with ISP number assignment.
   c) There is no web page specific to ISP number assignment.
2) The transport utilized for end user customers dialing ISPs is the same transport utilized for all end users. We don't have any transport facilities specific to ISPs. If the end user dials an ISP number that is local to the end user it is picked up by ELI in the calling parties LCA either on Local Interconnect Trunks, paid for by ELI, or at an ELI fiber collocate.
   a) There are no transport components specific to ISPs.
   b) There are no transport components specific to ISPs.
   c) There is no web page specific to ISP originating transport.
3) No we do not perform this function
   a) None identified
   b) None identified
   c) None identified
4) We provide these services as follows.
   a) Component that provides the TDM to IP protocol conversion is a Cisco model 5800

access concentrator.

b) Component that provides the TDM to IP protocol conversion is a Cisco model 5800 access concentrator. There are no specific terms, conditions or pricing for the conversion process as it is integral to the design of the hardware and software purchased from Cisco. Pricing for the service is all inclusive of all of the sub components including the TDM to IP protocol conversion.
c) There are no web pages that ELI maintains that describe the TDM to IP conversion process. ELI does not maintain a product description of RSVP on its WebPages.

Respondent: Dennis Robins/Geoffrey Williams

Objection: Charles Best

Date: 9/11/06

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

Response:

ELI objects to this request as irrelevant, overbroad and unduly burdensome. Without waving its objections, ELI provides the following response:

206-436

206-812

206-971

206-973

253-344

253-579

253-681

253-736

253-830

253-981

360-448

360-353

360-397

360-816

360-838

425-250

425-732

425-740

425-791

425-952

425-974

425-977

425-984

425-988

509-321

Respondents: Diane Patterson, Dennis Robins

Objection: Charles Best

Date: 9/11/06

4. If ELI provides modem functionality (*e.g.*, answering the ISP call on behalf of the ISP and performing the ongoing TDS/IP and IP/TDM conversion) for ISP customers that provide ISP service to Washington customers, identify the specific geographical location of the equipment that provides such modem functionality for ISP customers, and describe each specific element or component of the modem functionality provided to ISPs by ELI.

Response:

ELI objects to this request as vague. ELI cannot answer this question because it does not know what TDS/IP is.

Respondent: Geoffrey Williams

Objection: Charles Best

Date: 9/11/06

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

Response:
ELI objects to this request as irrelevant. Without waiving its objection, ELI provides the following response: Yes. Service is provided by ELI.

Respondent: Dennis Robins

Objection: Charles Best

Date: 9/11/06

6. Excluding calls to ISPs, does ELI provide a service or services to Washington end users that allows such end users (whether Qwest end users or end users of ELI) 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 ELI 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 ELI bills Qwest reciprocal compensation for such traffic and at what rate; and

f. whether ELI 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 ELI to other companies with regard to such service.

Response:

ELI objects to this request as vague, overbroad and unduly burdensome. The question does not make sense. As ELI reads the question, the scenario laid out by Qwest has the ELI end user calling itself. Furthermore, ELI end users are not the same as Qwest end users. ELI does not offer services to Qwest end users.

Respondent: Dennis Robins

Objection: Charles Best

Date: 9/11/06

REQUESTS FOR ADMISSION

1. Admit that in Washington ELI obtains local telephone numbers from NANPA that it provides to its ISP customers.

Response:

ELI admits it obtains numbers from NANPA, some of which are provided to ISP customers.

Respondent: Dennis Robins

Date: 9/11/06

2. Admit that in Washington ELI 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:

ELI admits that it provides local telephone numbers to some ISP customers. Denies the remainder of the Request..

Respondent: Dennis Robins

Date: 9/11/06

3. Admit that in Washington ELI provides a service to ISPs that includes local telephone numbers obtained by ELI from NANPA.

Response:

ELI admits Request for Admission No. 3.

Respondent: Dennis Robins

Date: 9/11/06

4. Admit that in Washington ELI provides a service to ISPs that includes transport of ISP traffic to the location of the ISP equipment (whether owned by the ISP or provided by ELI that answers the ISP call.

Response:

ELI admits Request for Admission No. 4.

Respondent: Dennis Robins

Date: 9/11/06

8. Admit that in Washington ELI obtains local telephone numbers from NANPA that it provides to its non-ISP customers.

Response:

ELI admits Request for Admission No. 8.

Respondent: Dennis Robins

Date: 9/11/06

9. Admit that in Washington ELI provides on occasion local telephone numbers to non-ISP customers even though such non-ISP customers are not physically located in the same LCA with which the telephone numbers are associated.

Response:

ELI admits Request for Admission No. 9.

Respondent: Dennis Robins

Date: 9/11/06

10. Admit that in Washington ELI on occasion provides local telephone numbers to non-ISP customers, even though such non-ISP customers are not physically located in the same LCA with which the telephone numbers are associated, and that such non-ISP customers of ELI provide those telephone numbers to customers located in the LCA associated with the numbers in order to allow them to call the customer of ELI on a toll-free basis.

Response:

ELI Admits that on occasion, it provides local telephone numbers to non-ISP customers, even though such non-ISP customers are not physically in the same LCA with which the telephone numbers are associated. ELI denies the remainder of Request for Admission No. 10.

Respondent: Dennis Robins

Date: 9/11/06

11. Admit that in Washington some portion of the reciprocal compensation bills that ELI renders to Qwest represent traffic that originates in one LCA and terminates with non-ISP customers of ELI that are physically located in a LCA different than the LCA of the calling party.

Response:

ELI admits Request for Admission No. 11.

Respondent: Dennis Robins

Date: 9/11/06

14. With regard to ELI's denial of the allegations of paragraph 15 of Qwest's complaint, please state ELI's understanding of the proper means by which local traffic and interexchange (sometimes also referred to as "long distance" or "toll" traffic) are distinguished in the state of Washington.

Response:
ELI objects to this request as irrelevant, overbroad, seeking attorney work product and subject. Without waiving its objection, ELI responds to the request as follows: See WAC 480-120-21. All routing and billing systems rely on the NPA/NXX to make this determination. For example, if the NPA/NXX of the calling number is in the same LCA as the NPA/NXX of the called number the call is local.

Respondents: Charles Best, Dennis Robins

Date: 9/25/06