

Data Request 1. Identify all specific services offered by Global Crossing to ISPs that serve end user customers in Washington. Provide a narrative description of each such service.

Response: There are no specific services that Global Crossing offers that are unique to dial-up ISPs. The services that are available to ISPs are the same services that are available to end user customers. Those services can be found in Global Crossing's local services tariff on file with the Commission.

Prepared by: Diane L. Peters
Date: September 11, 2006

Data Request 2. Does Global Crossing 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 Global Crossing 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 Global Crossing 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 Global Crossing provides any such components:

- a. Identify each component of each such service offered by Global Crossing 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.

Objection: Global Crossing objects to this request on the grounds that it is overbroad and unduly burdensome and improperly asks Global Crossing to undertake Qwest's own research in seeking extensive information on Qwest-defined "components" of every service offered to ISPs. Global Crossing also objects to this request to the extent it seeks the identity of "components" or services "that provide telecommunications functionalities" as vague and ambiguous, requesting a legal conclusion, and improperly seeking interpretation of data, rather than the data itself. Global Crossing also objects to the this request on the grounds that the use of the term "local" to modify "telephone numbers" misconstrues how Global Crossing obtains number resources, and the response to this request ignores that term.

Response: Subject to, and without waiver of, those objections, Global Crossing does not provide services to ISPs in the State of Washington. Global Crossing does provide services to wholesale customers who may, in turn, provide services to ISPs. However, Global Crossing is unaware of the identities of the customers of its customers or the services that its wholesale customers provide to their customers. See also Response to Data Request 1.

Prepared by: Diane L. Peters

Objection by: Michael J. Shortley, III
Date: September 11, 2006

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

Response: Affiliates of Global Crossing provide interexchange services to customers in the State of Washington.

Prepared by: Diane L. Peters
Date: September 11, 2006

Data Request 6. Excluding calls to ISPs, does Global Crossing provide a service or services to Washington end users that allows such end users (whether Qwest end users or end users of Global Crossing) 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 Global Crossing 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 Global Crossing bills Qwest reciprocal compensation for such traffic and at what rate; and
- f. whether Global Crossing 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 Global Crossing to other companies with regard to such service.

Objection: Global Crossing objects to this request on the grounds that it is vague and ambiguous in failing to define "elements" of service and that Qwest is improperly requesting Global Crossing to undertake Qwest's research of Global Crossing's product offerings.

Response: Subject to, and without waiver of, these objections, Global Crossing's product offerings are listed in its local services tariff on file with the Commission. To the extent that Global Crossing interconnects with Qwest pursuant to an interconnection agreement and traffic is utilizing interconnection trunks, Global Crossing would be either billing Qwest or being billed by Qwest for reciprocal compensation with respect to such traffic, and would not be billing Qwest access charges for such traffic. Qwest is in a better position than Global Crossing to know on what types of traffic it is billing a Global Crossing entity intrastate access charges.

Prepared by: Diane L. Peters

Objection by: Michael J. Shortley, III

Date: September 11, 2006

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

Response: Admit.

Prepared by: Diane L. Peters

Date: September 11, 2006

WUTC Docket No. UT-063038
Global Crossing Response to Qwest's Second Data Requests
September 25, 2006

Data Request No. 14:

Does Global Crossing 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 Global Crossing provides its FX service, state whether Global Crossing 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 and that Global Crossing routes to its customers physically located in a different local calling area. If Global Crossing 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 Global Crossing transports its FX service traffic from the originating local calling area to the local calling area in which Global Crossing's customer is physically located?
- c. Does Global Crossing use Qwest facilities to transport some or all of Global Crossing's FX traffic from one local calling area to another local calling area in Washington? If so:
 1. Does Global Crossing purchase any of the transport from Qwest at interstate private line rates?
 2. Does Global Crossing purchase any of the transport from Qwest at intrastate private line rates?
 3. Does Global Crossing purchase any of the transport from Qwest at TELRIC-priced local interconnection service (LIS) transport (such as direct trunked transport)?
 4. Does Global Crossing purchase any of the transport from Qwest on any other basis not identified above. If so, describe the type of transport purchased by Global Crossing?
- d. Does Global Crossing use the transport facilities of an ILEC or CLEC other than Qwest to transport some or all of Global Crossing's FX traffic from one local calling area to another local calling area in Washington? If so:

1. Does Global Crossing purchase any of the transport from other ILECs or CLECs at interstate private line rates?
 2. Does Global Crossing purchase any of the transport from other ILECs or CLECs at intrastate private line rates?
 3. Does Global Crossing 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 Global Crossing 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 Global Crossing?
- e. Provide all documents, including written tariffs, price lists, customer agreements (or any other written documents), wherein Global Crossing states the terms and conditions of Global Crossing's FX service in Washington.

Response:

Global Crossing objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is unduly burdensome. Subject to, and without waiver of, those objections, yes, Global Crossing provides foreign exchange ("FX") service.

- a. Global Crossing compensates Qwest for the use of its network facilities in the same manner as Qwest compensates Global Crossing for the use of its network facilities – through the reciprocal compensation and related provisions of the parties' interconnection agreement.
- b. Global Crossing transports FX traffic in the same manner as Global Crossing transports all traffic, *i.e.*, via transport facilities from the demarcation point between Global Crossing's network and the customer (or other carrier) to Global Crossing's switch and from Global Crossing's switch to the demarcation point where Global Crossing delivers the calls to the customers (or other carrier).
- c. Global Crossing uses Qwest facilities to transport all traffic between Global Crossing's switch and the demarcation points between Global Crossing's network and Qwest's network.
 1. Qwest invoices Global Crossing each month for the service that Qwest provides to Global Crossing. Qwest is in possession of the requested information.
 2. See above.

3. See above.

4. See above.

d. To the best of the undersigned's knowledge the answer is no with respect to the traffic encompassed by Qwest's data request.

e. Global Crossing's price list is currently on file and public available from the Washington Commission.

Prepared by: Michael J. Shortley, III; Counsel (objections)
Date: September 25, 2006

WUTC Docket No. UT-063038
Global Crossing Response to Qwest's Third Data Requests
October 26, 2006

Data Request No. 20:

With regard to Global Crossing's response to Request for Admission No. 11, it admits that "some portion of the reciprocal compensation bills that Global Crossing Renders to Qwest represent traffic that originates in one LCA and terminated to non-ISP customers of Global Crossing that are physically located in a LCA different than the LCA of the calling party." With regard to that response, please identify each type of situation in which Global Crossing would bill Qwest reciprocal compensation for traffic that does not originate and terminate in the same LCA. By month for the past twelve months, identify the percent of traffic for which Global Crossing has billed Qwest that falls into these categories.

Response:

Global Crossing objects to the last sentence of this request on the grounds that Global Crossing does not keep records in the ordinary course that would permit it to determine the percentage of its traffic for which it bills Qwest reciprocal compensation in these circumstances without performing a special study.

Subject to and without waiving the foregoing objection, Global Crossing provides the following answer. Global Crossing has billed Qwest reciprocal compensation (which Qwest has not paid) in situations relevant to this complaint where the calling party and called party are both within Global Crossing's local calling area, as defined in its price list on file with the Commission. Global Crossing also provides a foreign exchange service, as defined in its price list.

Prepared by: Diane L. Peters
Objection by: Michael J. Shortley, III
Date: October 26, 2006