

Before the

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UT-063038

**MCIMETRO ACCESS TRANSMISSION SERVICES LLC
d/b/a VERIZON ACCESS TRANSMISSION SERVICES**

**RESPONSES TO QWEST FIRST SET OF DATA REQUEST NOS. 1 – 11
AND REQUESTS FOR ADMISSION NOS. 1 - 11**

September 25, 2006

QWEST DATA REQUEST NO. 1:

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

RESPONSE:

Verizon Access Transmission Services (“Verizon Access”) does not offer services to Internet service providers (“ISPs”). To the extent that this request seeks information about affiliates of Verizon Access, Verizon objects to the request as irrelevant and beyond the scope of this proceeding, in which Qwest has complained that Verizon Access (not any affiliate of Verizon Access) is violating Qwest’s tariffs and particular provisions of Washington law. Without waiving this objection, Verizon Access responds that MCI Communications Services, Inc., d/b/a Verizon Services (“Verizon Services”), which is not a party to this proceeding, provides interexchange and enhanced services throughout the country. One such service gives large customers (typically, ISPs or corporations) the ability for their users to connect to these customers’ Internet-protocol (“IP”)-enabled networks using land-line, dial-up telephone service. Verizon Services’ offerings of this type are customized to the needs of the individual customer and provided solely under multi-state contracts that do not include state-specific rates or terms.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST DATA REQUEST NO. 2:

Does Verizon 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 Verizon 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 VERIZON 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 Verizon provides any such components:

- a. Identify each component of each such service offered by Verizon 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:

No, Verizon Access does not offer services to ISPs. *See* response to data request 1, above. In addition, Verizon Access objects to this request because the term “local telephone numbers” is vague, ambiguous, and undefined. To the extent Verizon Access responds to the subparts of this request, it does so without waiving this objection.

- a. Verizon Access objects to this request to the extent it seeks information about Verizon Access’ affiliates. *See* objection to data request 1, above. Without waiving this objection, Verizon Access responds that Verizon Services provides certain of the service components listed in the request. These components include: a) provision of network access server functionality; b) in certain circumstances, the transmission of customer traffic between the Verizon Access class 5 switch and the network access server; and c) transmission of customer traffic between the network access server and the Internet. The network access server functionality includes data call termination, data call conversion to Internet protocol, and Internet protocol packet assembly. In addition, as explained in response to part (b) of this data request, Verizon Services utilizes certain capabilities from Verizon Access in providing some of its services.
- b. Verizon Access objects to this request to the extent it seeks information about Verizon Access’ affiliates. *See* objection to data request 1, above. Verizon Access also objects to this request to the extent it seeks information about pricing of these services, which is not relevant to any issue in this proceeding. Without waiving these objections, Verizon Access responds that when a data call is originated to Verizon Services’ ISP customer by a Qwest telephone customer

in Washington, Qwest passes that call to a Verizon Access point of interconnection over SS7-capable trunks, and Verizon Access' Class 5 switch switches the call. As explained in response to data request 1, above, Verizon Services provides service under customized contracts that do not include state-specific rates or terms.

c. As Verizon Access explained, it does not offer services to ISPs, and it objects to this request to the extent it seeks information about Verizon Access' affiliates. *See* objection to data request 1, above. Without waiving this objection, Verizon Access refers Qwest to the website, www.verizonbusiness.com.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST DATA REQUEST NO. 3:

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

RESPONSE:

Verizon Access objects to this request because the term “local telephone numbers” is vague, ambiguous, and undefined. Telephone numbers are not categorized as “local” or “non-local” when they are requested from NANPA. To the extent Verizon Access responds to this request, it does so without waiving this objection.

Some of the NPA/NXX combinations assigned to Verizon Access for use in Washington may be utilized by ISP customers of Verizon Services. Because Verizon Access acknowledges that it does not attempt to prohibit use of these NPA/NXXs by ISPs, it objects to this request as seeking information that is unnecessary and not relevant to any disputed issue in this proceeding.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business

Date: September 25, 2006

Witness: TBD

QWEST DATA REQUEST NO. 4:

If Verizon 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 Verizon.

RESPONSE:

Verizon Access does not offer services to ISPs, and it objects to this request to the extent it seeks information about Verizon Access' affiliates. *See* objection and response to data request 1, above. Verizon Access also objects to this request because it is vague and ambiguous, as the term "TDS" is undefined. In addition, because Verizon Access acknowledges that it does not attempt to prohibit use of VNXX arrangements, it objects to this request as seeking information that is unnecessary and not relevant to any disputed issue in this proceeding.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST DATA REQUEST NO. 5:

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

RESPONSE:

Verizon Access is certificated as a CLEC in Washington. Its certification includes the authority to provide intraLATA services, including intraLATA interexchange services. Verizon Access objects to this request to the extent it seeks information about Verizon Access' affiliates. *See* objection to request 1, above. Without waiving this objection, Verizon Access responds that its affiliates certificated to provide interexchange services in Washington include Verizon Services, Teleconnect Long Distance Services and Systems Company d/b/a Telecom*USA, TTI National, Inc., Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, Verizon Select Services Inc., and Nynex Long Distance Company d/b/a Verizon Enterprise Services.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST DATA REQUEST NO. 6:

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

RESPONSE:

Yes. Verizon Access objects to this request to the extent it seeks information about Verizon Access' affiliates. *See* objection to request 1, above. To the extent Verizon Access responds to the subparts of this request, it does so without waiving this objection.

- a. Verizon Access provides an inbound-only service in its Washington Price List No. 3, at Sheet 63 of Section 10. Verizon Services offers such a capability as part of its voice over Internet protocol ("VoIP") service. *See* http://www.verizonbusiness.com/external/service_guide/reg/cp_mci_advantage.htm for information about the service.
- b. The Verizon Access service identified in subpart (a) allows customers to receive inbound calls from callers in other local calling areas. The Verizon Services service identified in subpart (a) allows the VoIP customer to receive inbound calls on a Direct Inward Dial ("DID") number associated with a location that is different from the local exchange area where the call is terminated.

c. Both of the aforementioned services require the “called party” to purchase the inbound calling capability as part of the service offering.

d. Verizon Access objects to this request because pricing of the services at issue is not relevant to any issue in this proceeding to examine the lawfulness of VNXX arrangements.

e. Traffic terminating to the customers of these services presents itself to the Verizon Access switch and billing systems no differently than voice traffic terminating to any other customer of Verizon Access. If the calling and called telephone numbers are rated in the same local exchange calling area, the originating carrier would be charged the reciprocal compensation rates as set forth in the Qwest/Verizon Access interconnection agreement (“ICA”).

f. No. If the calling and called telephone numbers are rated in the same local exchange area, then the response to Data Request No. 6e applies.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business (6a-d)
Dennis L. Ricca - Senior Financial Analyst - Verizon Business (6e-f)
Date: September 25, 2006
Witness: TBD

QWEST DATA REQUEST NO. 10:

Does Verizon provide a service in Washington that it considers similar to Qwest's FX service. If so, describe the service in detail, including a detailed description of the routing of traffic call from a Qwest end user in one LCA to a customer of the "FX" service provided by Verizon located in a different LCA.

RESPONSE:

Yes. Verizon Access' offering was described in response to data request 6 above. Verizon Access objects to this request to the extent it seeks information about Verizon Access' affiliates. *See* objection to request 1, above. Without waiving this objection, Verizon Access responds by referring to its response to data request 6, above. For the Verizon Access service, such a call is routed from the Qwest end user's exchange to the appropriate point of interconnection with Verizon Access, where the call is handed off and carried over interconnection trunks to the Verizon Access Class 5 switch, where the call is then completed over the called party's access facility to the customer's Customer Premises Equipment. For the Verizon Services offering, such a call is routed from the Qwest end user's exchange to the appropriate point of interconnection with Verizon Access, where the call is handed off and carried over interconnection trunks to the Verizon Access Class 5 switch. The call is then passed to a media gateway for conversion to Internet protocol and then routed via Verizon Services' Internet facilities to the called party's access facility and terminated to the customer's Customer Premises Equipment.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 1:

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

RESPONSE:

Deny. Verizon Access does not offer services specifically to ISPs, and it objects to this request to the extent that it seeks information concerning Verizon Access' affiliates. Verizon Access also objects to this request because the term "local telephone numbers" is vague and ambiguous. As explained, Verizon Access obtains telephone numbers (not "local telephone numbers") from NANPA and it assigns them to Verizon Services, which may, in turn, assign them to its ISP customers.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 2:

Admit that in Washington Verizon 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:

Verizon objects to this request because the grammar is wrong, so it does not make sense. Verizon Access also objects to this request because the term “local telephone numbers” is vague and ambiguous. Without waiving these objections, Verizon assumes the request is asking Verizon Access to admit that it provides telephone numbers to ISPs that the ISPs’ customers can use to access the Internet through the ISP. Given this understanding, Verizon Access denies the request for admission. Verizon Access does not offer services specifically to ISPs, and it objects to this request to the extent that it seeks information concerning Verizon Access’ affiliates.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 3:

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

RESPONSE:

Deny. Verizon Access does not offer services to ISPs, and it objects to this request to the extent that it seeks information concerning Verizon Access' affiliates. Verizon Access also objects to this request because the term "local telephone numbers" is vague and ambiguous.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 4:

Admit that in Washington Verizon 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 Verizon) that answers the ISP call.

RESPONSE:

Deny. Verizon Access does not offer services to ISPs, and it objects to this request to the extent that it seeks information concerning Verizon Access' affiliates.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business

Date: September 25, 2006

Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 5:

Admit that in Washington Verizon provides a service to ISPs that includes authentication that the calling party is a valid customer of the specific ISP customer.

RESPONSE:

Deny. Verizon Access does not offer services to ISPs, and it objects to this request to the extent that it seeks information concerning Verizon Access' affiliates. Without waiving this objection, Verizon Access responds that Verizon Services offers authentication service to ISPs.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 6:

Admit that in Washington Verizon provides a service to ISPs that includes the initial modem functionality (*i.e.*, whereby Verizon provides the equipment that answers the call on behalf of the ISP and that provides the TDS-IP conversion function throughout the course of the of the ISP call).

RESPONSE:

Deny. Verizon Access does not offer services to ISPs, and it objects to this request to the extent that it seeks information concerning Verizon Access' affiliates. Verizon Access also objects to this request because "TDS" is vague, ambiguous, and undefined. Without waiving these objections, Verizon Access responds that its response to data request 2(a), above, describes the features Verizon Services offers.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 7:

Admit that in Washington Verizon bills Qwest for termination of all ISP calls at \$.0007 per minute without regard to the physical location of the calling party and the physical location of the equipment that answers the call on behalf of the ISP and that provides the TDS-IP conversion function throughout the course of the of the ISP call.

RESPONSE:

Verizon Access objects to this request because “TDS” is vague, ambiguous, and undefined. Without waiving this objection, Verizon Access denies the request. All local traffic, as defined in the Qwest/Verizon Access ICA, is billed at the reciprocal compensation rates as set forth in the ICA.

Prepared by: Dennis L. Ricca - Senior Financial Analyst - Verizon Business (6e-f)
Date: September 25, 2006
Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 8:

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

RESPONSE:

Verizon Access objects to this request because the term “local telephone numbers” is vague and ambiguous. Without waiving this objection, Verizon Access admits that it obtains telephone numbers from NANPA that it provides to its non-ISP customers. Verizon Access does not request “local telephone numbers” from NANPA.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST REQUEST FOR ADMISSION NO. 9:

Admit that in Washington Verizon 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:

Verizon Access objects to this request because the term “local telephone numbers” is vague and ambiguous, and to the extent it seeks information concerning Verizon Access’ affiliates. Without waiving these objections, Verizon Access denies the request for admission. As noted in response to data request 6, Verizon Access does not offer a service that makes use of such arrangements, although Verizon Services provides a business-class VoIP service that may utilize numbering resources in the manner described in this request for admission.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: September 25, 2006
Witness: TBD

QWEST DATA REQUEST NO. 23:

In its response to Data Request No. 6(e), Verizon Access states that reciprocal compensation applies “[i]f the calling and called telephone numbers are rated in the same local exchange calling area.” Please provide a detailed description of what Verizon Access means by “calling and called telephone numbers are rated in the same local exchange calling area,” including whether such calls must originate and terminate in the same local calling area or whether merely having numbers with the same NXX code is sufficient.

RESPONSE:

Verizon Access objected to Data Request 6(e) to the extent it sought information about Verizon Access’s affiliates. Such information is not relevant to this proceeding, so Verizon objects to Data Request 23 for the same reason it objected to Data Request 6(e). In addition, this request is inappropriate to the extent it seeks a legal conclusion as to the meaning of intercarrier compensation provisions in interconnection agreements. Qwest’s Complaint alleges that VNXX arrangements are unlawful; it does not seek enforcement or interpretation of any intercarrier compensation provisions in any party’s interconnection agreement. Verizon Access applies reciprocal compensation in accordance with the provisions in its interconnection agreements, which are legal documents that speak for themselves.

Without waiving these objections, Verizon reiterates that traffic terminating to customers using VNXX arrangements presents itself to the Verizon Access switch and billing systems no differently than voice traffic terminating to any other customer of Verizon Access. As long as the calling and called telephone numbers are associated with the same local exchange calling area in the Local Exchange Routing Guide (“LERG”), a call (including a call to a VNXX number) is treated for rating purposes as though the numbers are located within the same local exchange calling area, and subject to intercarrier compensation as set forth in the Qwest/Verizon Access interconnection agreement. Virtual NXX calls, by definition, physically originate and terminate in different local calling areas.

Prepared by: Don Price - Director - State Regulatory Policy - Verizon Business
Date: October 27, 2006
Witness: TBD