

September 26, 2006

**VIA U.S. MAIL AND E-MAIL**

Carol J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
Olympia, WA 98504-7250

Re: *In the Matter of the Petition of Level 3 Communications*  
WUTC Docket No. UT-063006

Dear Ms. Washburn:

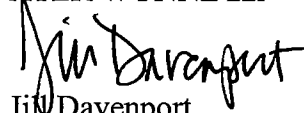
Enclosed for filing in the above-referenced docket is the original and two (2) copies of Level 3's response to Bench Request No. 3.

Copies of these documents have been sent to all parties on the attached Certificate of Service via the method(s) indicated.

If you have any questions, please feel free to contact our office.

Sincerely,

ATER WYNNE LLP



Jill Davenport  
Paralegal to Arthur A. Butler

Enclosures

cc: Parties of Record

BEFORE THE  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

IN THE MATTER OF

LEVEL 3 COMMUNICATIONS, LLC'S  
PETITION FOR ARBITRATION PURSUANT  
TO SECTION 252(B) OF THE  
COMMUNICATIONS ACT OF 1934, AS  
AMENDED BY THE  
TELECOMMUNICATIONS ACT OF 1996,  
AND THE APPLICABLE STATE LAWS FOR  
RATES, TERMS, AND CONDITIONS OF  
INTERCONNECTION WITH QWEST  
CORPORATION

Docket No. UT-063006

**LEVEL 3 COMMUNICATIONS,  
LLC'S RESPONSE TO BENCH  
REQUEST NO. 3**

Level 3 Communications, LLC ("Level 3"), by and through its undersigned attorneys, hereby submits its Response to the Bench Request of the Washington Utilities and Transportation Commission ("Commission"), dated September 12, 2006, as follows:

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION  
RESPONSE TO BENCH REQUEST**

Docket No.: UT-063006  
Response Date: September 26, 2006  
Requestor: Commission  
Respondent: Level 3  
Prepared by: Erik Cecil

**BENCH REQUEST NO. 3:**

Please provide details on which regional Bell Operating Companies (RBOC) and Level 3 have agreed to use a single trunking architecture using factors. For each such arrangement, please identify the RBOC, the state in which the arrangement occurs, the type of trunks involved (LIS, Feature Group D, etc.), the types of traffic mixed on trunk groups (inter-state, intra-state, VoIP, VNXX, etc.), the type of signaling involved (SS7 or ISDN PRI), and the factors used to allocate costs.

**LEVEL 3'S RESPONSE TO BENCH REQUEST NO. 3:**

Level 3 and Verizon, AT&T and BellSouth exchange ISP-bound, VoIP and 1+ dialed traffic (terminating only) over Level 3's massive interconnection network with each of these carriers. These carriers agreed to use Level 3's measure and factors method because it conserves network resources and because it produces accurate, reliable and verifiable results.

As detailed in the Direct Testimony of Mr. Wilson and Mr. Greene, Level 3 works closely with each of these local telephone companies to calculate the proper rating for traffic. Level 3 would use these very same processes with Qwest. So Qwest would be paid according to the same timeframes, same manner and same amounts under the factors method. So verification would be the same with Qwest, and audit verification would be the same with Qwest, just as they are with the other RBOCs.

From a network perspective, the interconnection architecture proposed by Level 3 with Qwest uses SS7 signaling just as it does with the other RBOCs. Finally, Verizon, AT&T and Qwest all use the same types of switches, all of which have great flexibility in their operation, so these switches can easily route 1+ dialed traffic at interconnection trunks. Level 3 utilizes this architecture with Verizon, AT&T and BellSouth in a total of 34 states as listed below:

<b>Verizon</b>	<b>AT&amp;T</b>	<b>BellSouth</b>
Delaware	Illinois	Alabama
Massachusetts	Indiana	Florida
Maryland	Michigan	Georgia
New Hampshire	Nevada	Kentucky

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION  
RESPONSE TO BENCH REQUEST**

Docket No.: UT-063006  
 Response Date: September 26, 2006  
 Requestor: Commission  
 Respondent: Level 3  
 Prepared by: Erik Cecil

<b>Verizon</b>	<b>AT&amp;T</b>	<b>BellSouth</b>
Vermont	Ohio	Louisiana
New Jersey	California	Mississippi
New York	Connecticut	North Carolina
Pennsylvania	Kansas	South Carolina
Rhode Island	Oklahoma	Tennessee
Virginia	Missouri	
Washington D.C.	Arkansas	
Washington (State)	Texas	
California	Wisconsin	
Florida		
Hawaii		
Idaho		
Illinois		
Indiana		
Michigan		
North Carolina		
Ohio		
Oregon		
South Carolina		
Texas		
Wisconsin		
Maine		
West Virginia		

## CERTIFICATE OF SERVICE

I hereby certify that I have this 26th day of September, 2006, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn  
Executive Secretary  
Washington Utilities and Transportation  
Commission  
1300 S Evergreen Park Drive SW  
Olympia, WA 98504-7250

with a copy to: WUTC Records Center

Hand Delivered  
 U.S. Mail (first-class, postage prepaid)  
 Overnight Mail (UPS)  
 Facsimile (360) 586-1150  
 Email (records@wutc.wa.gov)

I hereby certify that I have this 26th day of September, 2006, served a true and correct copy of the foregoing document upon parties of record, via the method(s) noted below, properly addressed as follows:

***On Behalf Of Qwest Corporation:***

Lisa A. Anderl  
Qwest Corporation  
1600 7th Avenue, Room 3206  
Seattle WA 98191

*Confidentiality Status: Confidential*

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 Facsimile (206) 343-4040  
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***On Behalf Of Level 3 Communications, LLC:***

Erik Cecil  
Level 3 Communications, LLC  
1025 El Dorado Boulevard  
Bloomfield CO 80021-8869

*Confidentiality Status: Confidential*

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 Email (erik.cecil@level3.com)

***On Behalf Of Qwest Corporation:***

Thomas M. Dethlefs  
Qwest Corporation  
1801 California Street, 10th Floor  
Denver CO 80202

*Confidentiality Status: Confidential*

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***On Behalf Of Level 3 Communications, LLC:***

Victoria Mandell  
Level 3 Communications, LLC  
1025 El Dorado Boulevard  
Bloomfield CO 80021-8869

*Confidentiality Status: Confidential*

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**On Behalf Of Level 3 Communications, LLC:**

Mr. Rogelio E. Peña  
Peña & Associates, LLC  
1919 14th Street, Suite 610  
Boulder CO 80302

*Confidentiality Status: Public*

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**On Behalf Of Level 3 Communications, LLC:**

Scott Porter  
Level 3 Communications, LLC  
One Technology Center  
Tulsa OK 74103

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 Email (scott.porter@level3.com)

**On Behalf Of Commission:**

Ann E. Rendahl ALJ  
Washington Utilities and Transportation  
Commission  
1300 S Evergreen Park Drive SW  
PO Box 47250  
Olympia WA 98504-7250

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 Email (arendahl@wutc.wa.gov)

**On Behalf Of Qwest Corporation:**

Ted D. Smith  
Stoel Rives LLP  
201 South Main Street, Suite 1100  
Salt Lake City UT 84111-4904

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 Email (tsmith@stoel.com)

**On Behalf Of Level 3 Communications, LLC:**


Rick Thayer  
Level 3 Communications, LLC  
1025 El Dorado Boulevard  
Bloomfield CO 80021-8869

*Confidentiality Status: Confidential*

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 U.S. Mail (first-class, postage prepaid)  
 Overnight Mail (UPS)  
 Facsimile (720) 888-5134  
 Email (rick.thayer@level3.com)

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 26th day of September, 2006, at Seattle, Washington.

  
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