

RESPONSES TO SPECIFIC DATA REQUEST

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFI No. 1-1

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

Response: TCG offers Prime Connect/Prime Connect PRI DS1 Service, which is engineered to support the requirements of heavy users of local incoming traffic. Internet Service Providers use the service to permit their customers to dial-up a local non-toll number to access the public internet.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFI No. 1-2

Question: Does TCG 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 TCG 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 TCG 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 TCG provides any such components:

- a. Identify each component of each such service offered by TCG 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: 1-TCG does provide local telephone numbers to ISPs.

- a. TCG provides local telephone numbers that enable end users to dial their ISP provider as a local call.
- b. TCG provides Prime Connect PRIs that connect from a TCG Switch to the ISP's modems. For information on price, terms, and conditions of this service see attached Price List, Bates stamp nos. 000001 - 000011.
- c. See attached Bates stamp no. 000012 for public websites; non-public, secure websites are for company internal use only.

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFI No. 1-2

2-TCG does provide transport from the local calling area ("LCA") (as defined by the WUTC) of the ISP's end-user customer to the point or points of interconnection ("POIs") of TCG in Washington.

- a. TCG provides Prime Connect PRIs that connect from a TCG Switch to the ISP's modems.
- b. For information on price, terms, and conditions of this service, see attached price list, Bates stamp nos. 000001 – 000011.
- c. See Bates stamp no. 000012.

3-TCG does not authenticate the calling party on behalf of an ISP.

4-TCG does not provide the initial modem functionality on behalf of the ISP whereby the protocol conversion between the analog, time division multiplexing ("TDM") signals sent by the ISP's 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.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFI No. 1-4

Question: If TCG 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 TCG.

Response: TCG does not provide modem functionality to ISPs.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFI No. 1-5

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

Response: TCG provides intraLATA interexchange service in the state of Washington.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFI No. 1-6

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

Response:

- a. See response to question 1-2 above.
- b. Prime Connect is an incoming only T1-based service that allows end user customers to dial a local telephone number which may or may not terminate to a location which is outside the end user's local calling area and have the call rated as a local call.
- c. In all cases the called party pays TCG for the service.
- d. The called party pays per DS1/T1 facility on a per month basis. The facility is not usage sensitive.
- e. Regarding such traffic, TCG does not bill Qwest reciprocal compensation; TCG maintains a "Bill & Keep" arrangement with Qwest, pursuant to the parties' Washington Interconnection Agreement.

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFI No. 1-6

- f. Regarding such traffic, TCG is not aware that it is paying or has paid Qwest, or any other company in Washington, access charges for the origination, transport, or termination of such traffic.

Responsible Person: Kenneth Robert Rovinsky (a-d)
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

James M. Moore (e, f)
Senior Specialist
One AT&T Way, Room 4C215E
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFA No. 1-2

Question: Admit that in Washington TCG 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: TCG objects to the question as vague and ambiguous in its use of the terms "ISP customers" and "provide to." Without waiving that objection, TCG admits that it provides local telephone number to ISPs. TCG does not know if ISPs provide local telephone numbers to their customers.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFA No. 1-3

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

Response: TCG admits that in Washington it provides a service to ISPs that includes local telephone numbers obtained from NANPA.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFA No. 1-4

Question: Admit that in Washington TCG 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 TCG that answers the ISP call.

Response: TCG admits that in the state of Washington it provides a service to ISPs that includes transport of ISP traffic to the location of the ISPs Equipment. See the response to Question 1-2 for additional information.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFA No. 1-8

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

Response: TCG objects to the request as vague and ambiguous in its use of the term "non-ISP customers." Without waiving that objection, TCG admits that in the state of Washington it obtains local telephone numbers from NANPA that it provides to its customers including customers who are not ISPs.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921

Washington Docket No. UT-063038
Qwest Corporation
Request No. 1
RFA No. 1-9

Question: Admit that in Washington TCG 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: TCG objects to the request as vague and ambiguous in its use of the term “non-ISP customer.” Without waiving that objection, TCG admits that it provides, on occasion, local telephone numbers to customers who are not ISPs even though such customers are not physically located in the same LCA with which the telephone numbers are associated. See DRs 1-2 and 1-6 for additional information.

Responsible Person: Kenneth Robert Rovinsky
Senior Specialist
One AT&T Way, Room 4C215B
Bedminster, NJ 07921