

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for
Arbitration of an Interconnection
Agreement Between

DOCKET UT-093035

NORTH COUNTY
COMMUNICATIONS
CORPORATION OF WASHINGTON

NORTH COUNTY
COMMUNICATION'S
RESPONSE TO QWEST
CORPORATION'S
FIRST SET OF DATA
REQUESTS

and

QWEST CORPORATION
Pursuant to 47 U.S.C. Section 252(b).

North County Communications Corporation of Washington ("NCC") responds to Qwest Corporation's First Set of Data Requests as set forth below.

GENERAL OBJECTIONS

1. NCC objects to the Instructions to the extent they purport to require any action or response beyond what is required by the relevant rules, including the Washington Administrative Code.
2. NCC objects to the extent that any Request seeks documents or information protected from disclosure by any evidentiary privilege, including without limitation the attorney-client privilege and work product doctrine. NCC does not intend to produce any privileged documents.
3. Each response is provided subject to all appropriate objections, including without limitation objections concerning competency, relevancy, materiality, propriety, and admissibility that would require the exclusion of any statement contained if a witness present and testifying made the statement. All such objections and grounds are reserved and may be

interposed at the time of hearing or at such other time as may be appropriate.

RESPONSE FIRST SET OF DATA REQUESTS

REQUEST 1: Referencing Mr. Lesser's testimony at page 3, please provide copies of the interconnection agreements NCC has with AT&T and Verizon.

RESPONSE: NCC will provide the requested documents.

REQUEST 2: Please describe how NCC excludes any minutes associated with non-local traffic in the reciprocal compensation bills it sends to AT&T and Verizon.

RESPONSE: AT&T sends NCC a report that excludes the non-local minutes. NCC uses that to generate the bills. Verizon provides NCC with a report and deducts the non-local minutes.

REQUEST 3: Admit that NCC has an ICNAM (InterNetwork Calling Name) agreement with Qwest, applicable in Washington, Oregon, and Arizona.

RESPONSE: Admit.

REQUEST 4: Admit that such agreement requires SS7 signaling

RESPONSE: Admit.

REQUEST 5: Please describe NCC's plans to use the ICNAM agreement it has with Qwest, including the plans for implementing SS7 in NCC's network.

RESPONSE: NCC plans to send SS7 queries to Qwest using NCC's existing SS7 network.

DATED this 9th day of June, 2010.

MCNAMER & COMPANY PC

s/Anthony McNamer

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Attorneys for North County Communications

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for)	DOCKET UT-093035
Arbitration of an Interconnection)	
Agreement Between)	
)	
NORTH COUNTY)	
COMMUNICATIONS CORPORATION)	QWEST CORPORATION'S
OF WASHINGTON)	SECOND SET OF DATA
)	REQUESTS TO NORTH
and)	COUNTY COMMUNICATION
)	CORPORATION
QWEST CORPORATION)	
Pursuant to 47 U.S.C. Section 252(b).)	
.....)	

North County Communications Corporation of Washington ("NCC") responds to Qwest Corporation's Second Set of Data Requests as set forth below.

GENERAL OBJECTIONS

1. NCC objects to the Instructions to the extent they purport to require any action or response beyond what is required by the relevant rules, including the Washington Administrative Code.

2. NCC objects to the extent that any Request seeks documents or information protected from disclosure by any evidentiary privilege, including without limitation the attorney-client privilege and work product doctrine. NCC does not intend to produce any privileged documents.

3. Each response is provided subject to all appropriate objections, including without limitation objections concerning competency, relevancy, materiality, propriety, and admissibility that would require the exclusion of any statement contained if a witness present and testifying made the statement. All such objections and grounds are reserved and may be interposed at the time of hearing or at such other time as may be appropriate.

RESPONSE SECOND SET OF DATA REQUESTS

REQUEST 6: Admit that Local Exchange Routing Guide (LERG) correctly reflects the fact that NCC operates Nortel DMS-100 switches.

RESPONSE: Deny.

REQUEST 7: Admit that NCC uses one or more Nortel DMS-100 switches to interconnect with Qwest's network

RESPONSE: Deny.

REQUEST 8: Please identify the type of switch core for each of NCC's switches that NCC uses to interconnect with Qwest's network.

RESPONSE: Not applicable.

REQUEST 9: Please identify the type(s) peripheral interface modules e.g., Digital Trunk Controllers (DTCs) and Spectrum Peripheral Modules (SPMs) used with each of NCC's switches that NCC uses to interconnect with Qwest's network.

RESPONSE: Not applicable.

REQUEST 10: Please identify the current software load version used with each of NCC's switches that NCC uses to interconnect with Qwest's network.

RESPONSE: T14.0.1.

DATED this 16th day of June, 2010.

MCNAMER & COMPANY PC

s/Anthony McNamer

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UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for)	DOCKET UT-093035
Arbitration of an Interconnection)	
Agreement Between)	
)	
NORTH COUNTY)	
COMMUNICATIONS CORPORATION)	QWEST CORPORATION'S
OF WASHINGTON)	THIRD SET OF DATA
)	REQUESTS TO NORTH
and)	COUNTY COMMUNICATION
)	CORPORATION
QWEST CORPORATION)	
Pursuant to 47 U.S.C. Section 252(b).)	
.....)	

North County Communications Corporation of Washington ("NCC") responds to Qwest Corporation's Third Set of Data Requests as set forth below.

GENERAL OBJECTIONS

1. NCC objects to the Instructions to the extent they purport to require any action or response beyond what is required by the relevant rules, including the Washington Administrative Code.

2. NCC objects to the extent that any Request seeks documents or information protected from disclosure by any evidentiary privilege, including without limitation the attorney-client privilege and work product doctrine. NCC does not intend to produce any privileged documents.

3. Each response is provided subject to all appropriate objections, including without limitation objections concerning competency, relevancy, materiality, propriety, and admissibility that would require the exclusion of any statement contained if a witness present and testifying made the statement. All such objections and grounds are reserved and may be interposed at the time of hearing or at such other time as may be appropriate.

RESPONSE THIRD SET OF DATA REQUESTS

REQUEST 11: On page 3 of his direct testimony Mr. Lesser testifies that "Verizon and AT&T have the ability to track the minutes of use" on MF trunking. Please state the basis for that testimony, including all documents and other information that Mr. Lesser relied upon.

RESPONSE: AT&T and Verizon have the same switches as Qwest. This information is in the LSSGR. AT&T e-mails North County the total number of calls and minutes it should bill them each month. Verizon also e-mails North County the total amount it should bill them.

REQUEST 12: State whether it is North County's contention in this proceeding that Verizon and AT&T do individually track different types of traffic such as Interstate, Intrastate, Local, Transit, Operator Service, Directory Assistance, and 911 based upon the MF trunk connections that NCC uses to interconnect to Verizon and AT&T. If so, provide the basis for that contention.

RESPONSE: North County does not send Operator Service, Directory Assistance, and interstate toll calls over local interconnection trunks. North County receives tapes with incoming Interstate, Intrastate, and transit calls on them. North County is billed by Verizon and AT&T for outbound intrastate, transit and local calls.

DATED this 21th day of June, 2010.

MCNAMER & COMPANY PC

s/Anthony McNamer

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