

UT-093046

**Qwest**

1600 7th Avenue, Room 3206  
Seattle, Washington 98191  
(206) 398-2504  
Facsimile (206) 343-4040

**Maura E. Peterson**

Paralegal  
Regulatory Law



*Via web portal and  
Overnight Delivery*

September 15, 2009

Mr. Dave Danner, Executive Secretary  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, WA 98504-7254

RECEIVED  
RECORDS MANAGEMENT  
2009 SEP 16 AM 10:18  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

Re: Docket No. (Not Yet Assigned)  
Request for Approval of Adopted Interconnection Agreement between  
Qwest Corporation and MBC Telecom, LLC.

Dear Mr. Danner:

In accordance with WAC 480-07-640, please find enclosed the original Letter Agreement between Qwest Corporation ("Qwest") and MBC Telecom, LLC ("MBC"). MBC has adopted, in its entirety, the previously approved Agreement between Qwest and Global Crossing Local Services, Inc. of Washington, Inc. Docket No. UT-083010, approved by the Commission on April 22, 2008.

The enclosed Letter Agreement does not discriminate against non-party carriers. It is consistent with state and federal law, and is in the public interest. Qwest respectfully requests that the Commission approve this Agreement expeditiously.

Sincerely,

Maura E. Peterson

MEP:mep

Enclosure

cc: Jed Stafford

Helein & Marashlian, LLC



August 12, 2009

Jed Stafford  
MBC Telecom, LLC  
297 Kingsbury Grade, Suite D#4470  
Stateline, Nevada 89449-4470

Dear Mr. Stafford,

We have received your request that, under Section 252(i) of the Telecommunications Act of 1996, MBC Telecom, LLC ("CLEC") wishes to adopt in its entirety, the terms of the Wireline Interconnection Agreement and any associated amendments, if applicable, (the "Underlying Agreement") between Global Crossing Local Services, Inc. (Agreement # CDS-071012-0008) and Qwest Corporation ("Qwest"), that was approved by the Commission on April 22, 2008, as an effective agreement in the State of Washington. CLEC is incorporated in the State of Washington. We understand you have a complete copy of the Underlying Agreement.

By their respective signatures below, Qwest and CLEC (individually, a, "Party," or collectively, the "Parties") intend that this letter serves as their agreement ("Letter Agreement") for CLEC to adopt the Underlying Agreement under the following terms and conditions:

1. The Parties shall request the Commission to expedite its review and approval of this Letter Agreement. This Letter Agreement shall become effective upon such approval. If for some reason the Commission rejects all or part of the Letter Agreement either party may at its option declare the remainder of the Agreement void and be excused from any performance thereunder.
2. Notwithstanding the mutual commitments set forth herein, Qwest is entering into this Letter Agreement without prejudice to any positions it has taken previously, or may take in the future, in any legislative, regulatory, or other public forum addressing any matters, including those relating to the types of arrangements contained in the Underlying Agreement. During the proceeding in which the Commission is to review and approve the Letter Agreement, a Party may point out that it has objected, and continues to object, to the inclusion of the terms and conditions to which it objected in the proceedings involving the approval of the Underlying Agreement.
3. CLEC adopts the terms and conditions of the Underlying Agreement for interconnection with Qwest Corporation and in applying the terms and conditions, agrees that MBC Telecom, LLC be substituted in place of "Global Crossing Local Services, Inc." throughout the Underlying Agreement wherever the latter appears.
4. Qwest requests that notice to Qwest Corporation as may be required under the Underlying Agreement shall be provided as follows:

Qwest Corporation  
Director Interconnection Agreements  
1801 California Street, Room 2410  
Denver, CO 80202  
Phone - 303-965-3029  
Email – IntAgree@qwest.com

With copy to  
Qwest Corporation Law Department  
Attention: General Counsel, Interconnection  
1801 California Street, 10th Floor  
Denver, CO 80202  
Phone: 303-383-6553  
Email: Legal.Interconnection@qwest.com

CLEC requests that notice to CLEC as may be required under the Underlying Agreement shall be provided as follows:

MBC Telecom, LLC  
Jed Stafford  
297 Kingsbury Grade, Suite D#4470  
Stateline, Nevada 89449-4470  
Phone 775-298-3712  
Fax 775-298-3712  
Email - [jeds@mbccom.com](mailto:jeds@mbccom.com)

Copy to:  
Helein & Marashlian, LLC  
The *CommLaw* Group  
1420 Spring Hill Road, Suite 205  
McLean, Virginia 22101  
Phone 703-714-1300  
Fax – 703-714-1330  
Email - [mail@commlawgroup.com](mailto:mail@commlawgroup.com)

5. CLEC represents and warrants that it is a certified provider of local telecommunication service in the State of Washington and that this Agreement will cover services in that state only.

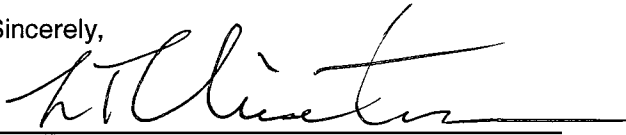
6. Please sign all three original copies of this letter, and overnight them within thirty (30) days to:

Manager of Interconnection  
Qwest Corporation  
1801 California St, Suite 2420  
Denver, CO 80202  
Phone: 303-965-3029

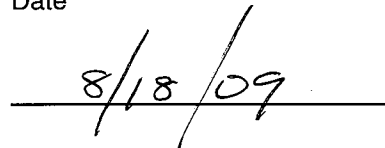
After thirty (30) days Qwest may rescind its willingness to consider this Letter Agreement's terms and conditions.

7. Please note that Qwest will file this Letter Agreement with the appropriate state commission for approval; however, some state commissions will not approve the Letter Agreement until the CLEC is certified by the state commission. You may want to contact the appropriate state commission to determine the requisite filing guidelines.

Sincerely,



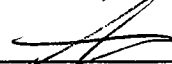
Date



**Qwest Corporation**  
L. T. Christensen  
Director – Wholesale Contracts  
1801 California Street, Suite 24th Floor  
Denver, Colorado 80202

I agree to all terms and conditions contained in this letter as indicated by my signature below:

**MBC Telecom, LLC**

  
\_\_\_\_\_  
Signature

Jed Stafford  
\_\_\_\_\_  
Name Printed

Partner  
\_\_\_\_\_  
Title

08-14-09  
\_\_\_\_\_  
Date