

2.2 With respect to your answer to Data Request 1.2, state the version history of Attachment 2A "Confidential Attachment 2A PacWest VNXX 9 06."

- (a) Further, this document, Attachment 2A, appears to have been created on April 8, 2005, but somehow reports on traffic in September 2006. Describe how a document generated in 2005 can report on traffic in the future (September 2006), explaining:
- (i) what edits took place to Attachment 2A and when;
 - (ii) what data was used to create Attachment 2A; and
 - (iii) provide the call detail records associated for the period of time that Attachment 2A covers.

Response:

The version history of Attachment 2A - see attached file "Version History 2A".

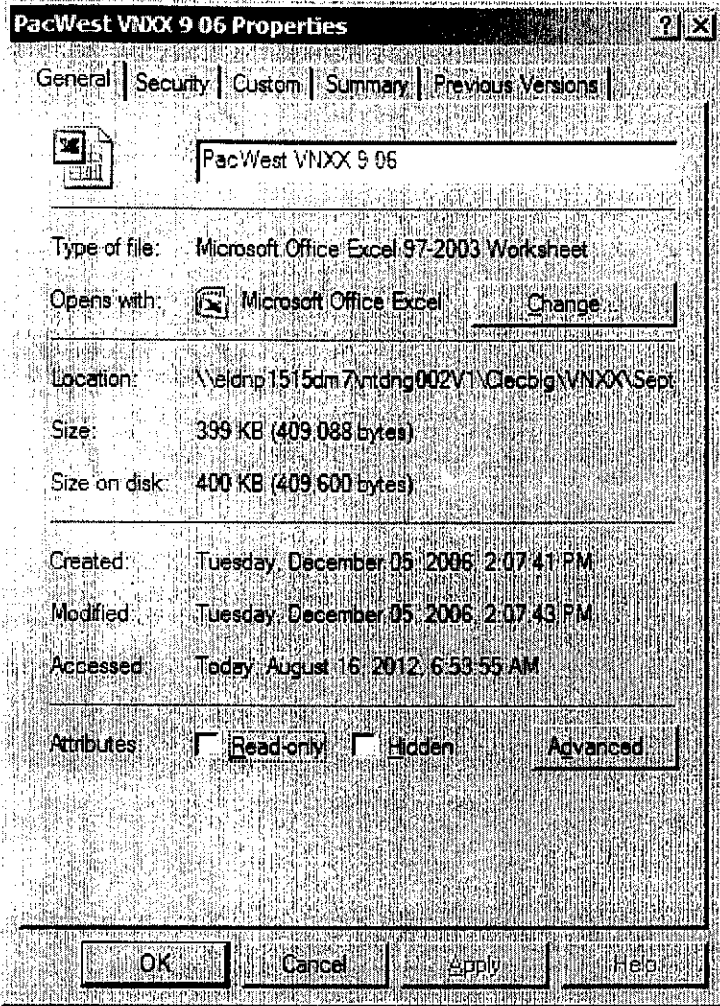
- (a) Footnote was not changed when the September 2006 data was pulled and copied into the VNXX Template.

(i) No edits took place.

(ii) MOU data from September 2006 of the CroSS7 System that tracked actual MOU from Qwest to PacWest and from PacWest to Qwest.

(iii) Qwest objects to providing call detail records because such records are irrelevant to the determination of whether a VNXX call is local or interexchange, and irrelevant to the compensation for that call. The call detail records provide the originating and terminating telephone numbers, which in the case of a VNXX call would show the call to be local. However, the Commission has already ruled that VNXX calls are not local, but rather are interexchange. Thus, call detail records would provide no additional information with regard to any disputed issues in this case. Furthermore, most, if not all, call records of this vintage have not been retained for this length of time and are no longer available.

Respondent: William Easton and Legal 2.2 (a)(iii)



*Version History
2A*