

- 2.3 With respect to your answer to Data Request 1.3:
- (a) state the version history of Attachment 3A "CONFIDENTIAL ATTACHMENT 3A PAC West VNXX 2004.xlsx";
 - (b) provide the call detail records associated for the period of time that Attachment 3A covers;
 - (c) state the version history of Attachment 3B "CONFIDENTIAL ATTACHMENT 3B WA VNXX Study 07-10.xls";
 - (d) provide the call detail records associated for the period of time that Attachment 3B covers;
 - (e) explain how negative minutes of use (e.g. "PRESUMED VNXX MOU") are possible in traffic studies provided by Qwest; and
 - (f) state the version history of Attachment 3C "CONFIDENTIAL ATTACHMENT 3C PW Current VNXX Study.xlsx."

Response:

- (a) See attached file "Version History 3A 1" which was the original file for all Pac West states that had VNXX traffic. See also "Version History A2" which is the WA only VNXX data copied from the original file into a new WA specific file.
- (a) 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.
- (b) see attached file "Version History 3B".

Qwest Corporation
Washington
Docket No. UT-053036 UT-053039 (Consolidated)
Qwest Responses to Pac-West's Second Set of Data Requests
August 24, 2012

- (c) 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.
- (d) Negative minutes are possible when one trunk group has more MOU from PW then QC sent to PW.
- (e) See attached file "Version History3C".

Respondent: William Easton and Legal (b) and (d)







