

ATTACHMENT 1

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-005

REQUEST:

Does Qwest provide any service in which the customer has a telephone number assigned to a local calling area other than the local calling area in which the customer is physically located? If so, please provide the following information:

- a. The name(s) of each such service and the tariff, price list, or contract provisions governing each service;
- b. The physical location of each customer receiving any such service, the customer's telephone number(s), and the local calling area to which the telephone number(s) is/are assigned; and
- c. An explanation of how calls between the customers of those services and customers of other carriers are rated and routed, including but not limited to the compensation Qwest pays or receives from the other carriers.

RESPONSE:

Yes. Qwest offers Foreign Exchange (FX) service and Primary Rate Service (PRS-Integrated Services Digital Network) with FCO or FX in Washington.

(a) Please refer to the Washington Exchange and Network Services Tariff for the provisions for Foreign Exchange Service and Primary Rate Service with FCO or FX.

(b) Qwest objects to this request insofar as it seeks individual customer information (CPNI) regarding FX subscribers that is not relevant to the dispute in this case and is not reasonably calculated to lead to the discovery of admissible evidence. FX service is very different from VNXX and in addition comprises only a miniscule part of Qwest's subscriber base. This traffic is a recognized exception to the NPA-NXX geographic numbering conventions and Qwest believes that such traffic is de minimus.

(c) For FX service, the customer purchases an FX connection in the local calling area in which the customer seeks a local number. All calls to and from other customers in the same local calling area where the FX customer purchased a connection are treated as local. All calls to and from customers outside the local calling area where the FX customer's connection was purchased are treated as toll calls. The additional transport for carrying calls from the local calling area where the connection was purchased, to the FX customer's location, is ordered as a private line tariffed service. When a retail customer of another carrier in local calling area one (LCA 1) places a call to a FX customer's number in LCA 2, the call is routinely dialed with a "1" as the first digit and classified as usage-sensitive toll; and the appropriate inter-carrier charges associated with the call would apply.

With Primary Rate Service, the customer can receive dial tone from a switch that is not in the customer's local wire center. If the switch is in a wire center in the same exchange, the customer can order a Foreign Central Office. If the switch is in a wire center in a different exchange, the customer can order Foreign Exchange. Either way, the customer would pay **Intrastate DS1** mileage between the wire centers. The transport mileage rate element would come from the state tariff, price list, catalog or ICB contract, whichever is applicable for the DS1 Service in the state. The customer will continue to pay

normal charges on the PRS (with the added cost of the DS1) **Intrastate** fixed
and per mile rates for transport mileage.

Respondent: Larry Brotherson

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-023

REQUEST:

Please identify the dates on which Qwest (a) established Qwest's position that what Qwest considers to be "VNXX" traffic is not local or ISP-bound traffic subject to reciprocal compensation or the compensation mechanism in the FCC's ISP Remand Order; (b) first notified interconnecting carriers of Qwest's position; and (c) began withholding payment on bills from any interconnecting carrier for compensation for what Qwest considers to be VNXX traffic pursuant to Qwest's position and/or notification.

RESPONSE:

(a) Qwest has taken the position that VNXX calls to ISPs are not local and are not subject to Reciprocal Compensation as early as February 2003. Since the ISP Remand Order, Qwest has paid and continues to pay for calls to ISPs within the local calling area. When identified, however, Qwest excludes VNXX calls as non local calls.

(b) Qwest notified interconnecting carriers of Qwest's position on VNXX traffic on January 25, 2005.

(c) The first payment Qwest withheld for what Qwest considered to be VNXX traffic was associated with 2004 MOU in January 2005.

Respondent: Larry Brotherson