

1. With regard to the Affidavit of Larry B. Brotherson in Support of Qwest Corporation's Motion for Summary Determination ("Brotherson Affidavit"), state the basis, in full detail, for Mr. Brotherson's assumption, at Paragraph 15 of the Brotherson Affidavit, that "67 percent of the total traffic from Qwest to Pac-West in Washington originated from exchanges that are not part of the Seattle local calling area ('LCA')."

Answer: CenturyLink QC performed a detailed study of the traffic exchanged between QC and PacWest. CenturyLink QC utilized the information in the Trunk Usage Measurement Set-up (TUMS) to determine which PacWest switch was associated with each trunk group (TSC). Next, CenturyLink QC compared the physical locations associated with the originating end users and the terminating switch to determine if they were physically located within the same, Qwest mandatory local calling area. The switch location was assumed to be the location of the ISP modem. It was not until much later after further discussions with PacWest employees and a detailed review of the Local Exchange Routing Guide (LERG) that it was determined that the PacWest "switch" listed in TUMS was merely a signaling transfer point and the actual switch was located in California.

Respondents: William Easton
Linda Downey

2. Please identify and provide each and every traffic study upon which Qwest/CenturyLink or Mr. Brotherson relies to support Mr. Brotherson's assumption, at Paragraph 15 of the Brotherson Affidavit, that "67 percent of the total traffic from Qwest to Pac-West in Washington originated from exchanges that are not part of the Seattle local calling area ('LCA')", with an explanation of all assumptions used in the studies. Please include the call detail records that were used to create the traffic studies.

Answer: The study is attached (Excel file named "Confidential Attachment 2A PacWest VNXX 9 06"). Tab 110 is Qwest originated traffic and Tab 119 is Pac-West originated traffic. The assumptions used were the same as listed in the answer for Data Request 1. Call detail records were not utilized to create the traffic study and are irrelevant since VNXX numbering arrangements are utilized in an attempt to mask non-local interexchange traffic as Local traffic.

Respondents: William Easton
Linda Downey

3. Please identify and provide any traffic studies Qwest/CenturyLink has with regard to the total traffic from Qwest to Pac-West in Washington since January 1, 2004, showing the nature of that traffic as either VNXX or local traffic, with an explanation of all assumptions used in the studies. Please include the call detail records that were used to create the traffic studies.

Answer: The studies are attached (Excel files named “Confidential Attachment 3A PacWest VNXX 2004”, “Confidential Attachment 2A PacWest VNXX 9 06” – provided in response to Data Request 2 , “Confidential Attachment 3B For PacWest VNXX Study 07-10” and “Confidential Attachment 3C PW Current VNXX Study”). The assumptions used for “PacWest VNXX 2004” were the same as listed in the answer for Data Request 1. The studies “For PacWest VNXX Study 07-10” and “PW Current VNXX Study” used the same methods as used for Data Request 1, but incorporated the fact that PacWest does not have a switch physically located in Washington. These studies also utilized the information provided by PacWest in determining VNXX traffic after modems were placed in Bellingham, Seattle, and Tacoma. Modems were operational on June 18, 2010. Call detail records were not utilized to create the traffic study and are irrelevant since VNXX numbering arrangements are utilized in an attempt to mask non-local interexchange traffic as Local traffic.

Respondents: William Easton
Linda Downey

4. Please provide Qwest/CenturyLink's most current estimates of the amounts Qwest/CenturyLink has paid to Pac-West for terminating compensation on Washington ISP traffic and what amounts Qwest/CenturyLink claims should be refunded together with interest. Please provide all workpapers or other documents supporting these estimates and claims.

Answer: The study is attached (Excel file "Confidential Attachment 4A Refund 5 12").

Respondents: William Easton
Linda Downey

5. Please provide Qwest/CenturyLink's most current estimates of the amounts of any access charges or other compensation Qwest claims are owed by Pac-West on VNXX traffic, together with interest. Please provide all workpapers or other documents supporting these estimates and claims, and copies of any tariff provisions upon which Qwest/CenturyLink relies to support such claims.

Answer: See the Excel file called "Confidential Attachment 3C PW Current VNXX Study". The first tab shows the access charge calculation without interest. Because the appropriate interest rate is an issue in this proceeding, no interest is calculated. However, once the rate is determined it is a simple mathematical calculation. The tariffed rates are contained in Section 6.8 of Qwest's switched access tariffs.

Respondents: William Easton
Linda Downey

CONFIDENTIAL ATTACHMENT 3A PAC West VNXX 2004.xlsx [Read-Only] - Microsoft Excel

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Themes Colors - Margins Orientation Size Print Area - Breaks Background Print Titles Width: Automatic - Gridlines Headings Bring to front - Align - Height: Automatic - View View Send to Back - Hide Height: Automatic - View View Selection Pane Rotate - Scale: 53% - Sheet Options Arrange

CONFIDENTIAL ATTACHMENT

CLEC: PacWest

QWEST ORIGINATING DATA

LATA	TERM STATE	CACNA	USW CLLI	TSC	TRAF TYPE	MONTH	QWEST TO CLEC ORIGINATING MOU	CLEC TO QWEST LOCAL MOU	PRESUMED VNXX MOU	% PRESUMED VNXX
Pac West is using the TKWLWALZDSO switch. Bainbridge Island, WA is not in the same LCA as the cities below and the calls are therefore deemed not										
674	WA	ARZ	TACMWAJUDS0	AP074598	TANDEM	Dec-04	841,858	0	841,858	100%
674	WA	ARZ	LACYWA01DS0	AP074620	TANDEM	Dec-04	1,871,365.93	0	1,871,366	100%
674	WA	ARZ	TACMWALODS0	AP074640	END OFFICE	Dec-04	486,298	0	486,298	100%
674	WA	ARZ	TACMWAGFDS0	AP074642	END OFFICE	Dec-04	895,344	238	895,106	100%
674	WA	ARZ	TACMWAFLDS0	AP074687	END OFFICE	Dec-04	169,199	0	169,199	100%
672	WA	ARZ	KENTWA01DS0	AP074933	END OFFICE	Dec-04	510,858	0	510,858	100%
674	WA	ARZ	OLYMWA02DS0	AP074953	END OFFICE	Dec-04	2,209,591.21	0	2,209,591	100%
674	WA	ARZ	TACMWAWADS0	AP075389	END OFFICE	Dec-04	305,546	0	305,546	100%
674	WA	ARZ	SMNIRWA01DS1	AP075390	END OFFICE	Dec-04	415,855	0	415,855	100%
674	WA	ARZ	CDMWAAGDS0	AP075391	END OFFICE	Dec-04	1,345,782	0	1,345,782	100%