

Announcement Date: January 27, 2005
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Notification Category: Product Notification
Target Audience: CLEC
Subject: VNXX on LIS Trunks

Local Interconnection Service (LIS) trunks are to be used only for the mutual exchange of Exchange Service (Local), Exchange Access, and Jointly Provided Switched Access Services. Calls that originate in one local calling area and terminate to an end user located in another local calling area are not Exchange Service calls, regardless of the NPA-NXX used for those calls, and should properly be treated as long distance calls.

Therefore, these types of calls should be rated using Qwest's Switched Access tariffs with appropriate provisioning of interexchange transport.

Qwest has become aware that <Company> is utilizing LIS trunking for the termination of inappropriate long distance traffic. This inappropriate use of LIS trunking is achieved by obtaining local NPA-NXXs and filing the NPA-NXXs in the Local Exchange Routing Guide (LERG), to give the appearance of a local dialing pattern for these intraLATA or interLATA toll calls. The industry now refers to this type of toll traffic as Virtual NXX (or "VNXX") traffic. **No interconnection agreement between Qwest and any party permits or requires the exchange of VNXX traffic, and LIS trunking should not be utilized for the exchange of VNXX traffic. This restriction includes Single Point of Presence (SPOP) LIS trunking arrangements.**

Please see the attached VNXX service example.

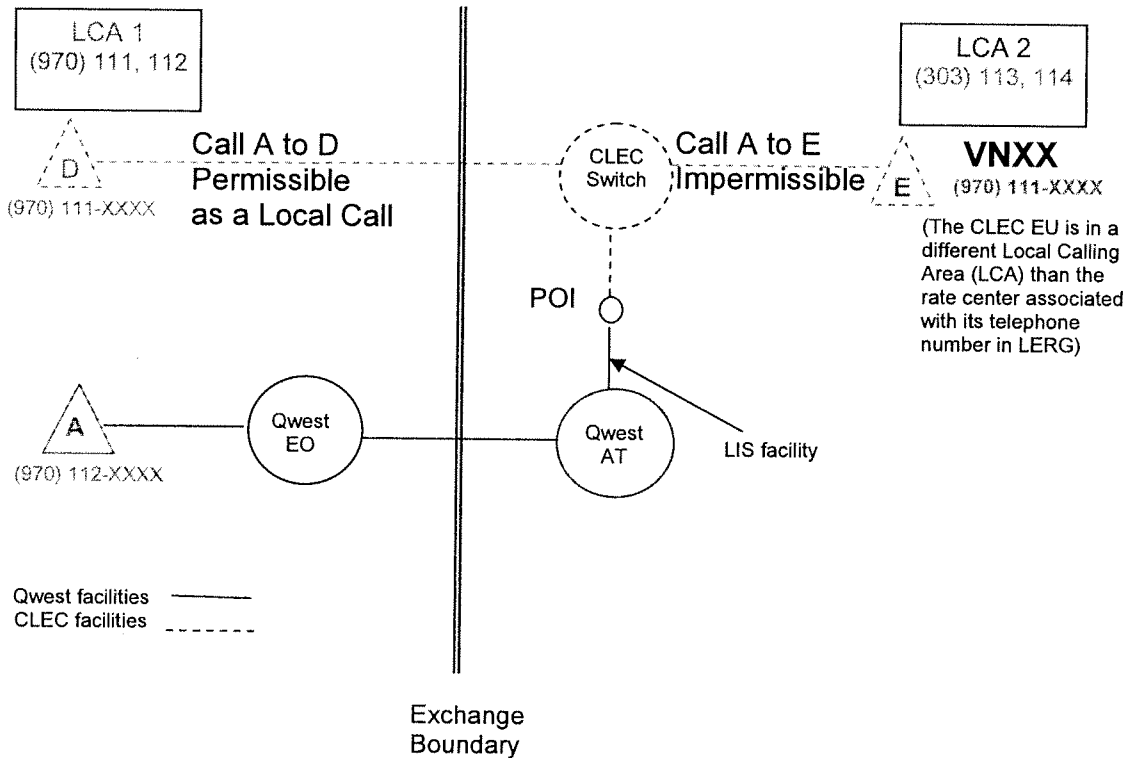
It is <Company>'s responsibility to ensure that VNXX traffic is not exchanged via LIS trunking arrangements. To resolve any potential misuse of LIS trunking arrangements, <Company> can take the following step:

- You can modify your assignment of telephone numbers to your end-user customers to ensure that they are only receiving a phone number with an NXX assigned to the rate center where they are physically located. This would modify the dialing patterns (to 1+) for your current VNXX traffic and either migrate the traffic from LIS to tariffed Switched Access Feature Group D trunks for interLATA traffic or appropriately use the LIS trunking if the traffic is Exchange Access traffic.

By this letter, Qwest is initiating a dispute with <Company> pursuant to the dispute resolution provisions of <Company>'s interconnection agreement with Qwest. Qwest requires that <Company> cease its use of VNXX architecture such that Qwest is forced to send VNXX traffic to <Company>. In addition, Qwest will be taking the following steps:

1. Cessation of payment of reciprocal compensation for VNXX traffic. Should <Company> dispute Qwest's findings with respect to the determination of VNXX traffic versus Exchange Service, Exchange Access or Jointly Provided Switched Access traffic, Qwest will, in good faith, work with <Company> to resolve that dispute;

VNXX SERVICE EXAMPLE



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