BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of Qwest Corporation for Arbitration with Eschelon Telecom, Inc. Pursuant to 47 U.S.C. Section 252 of the Federal Telecommunications Act of 1996

Docket No. UT-063061

TRADE SECRET DATA HAS BEEN EXCISED

EXHIBIT DD-15

TO THE

REBUTTAL TESTIMONY OF DOUGLAS DENNEY

ON BEHALF OF ESCHELON TELECOM, INC.

DECEMBER 4, 2006

TRADE SECRET DATA HAS BEEN EXCISED