

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In re Qwest Corporation's Proposed) DOCKET NO. UT-081973
Modifications to Section 2 of its Access)
Service Tariff)

**OBJECTION AND REQUEST TO SUSPEND QWEST'S PROPOSED
AMENDMENTS TO SECTION 2 OF ITS ACCESS SERVICE TARIFF
SUBMITTED BY VERIZON BUSINESS SERVICES**

MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon Business"), by its undersigned counsel, files this objection to Qwest Corporation's ("Qwest") Advice No. 3653T, WN-44, Section 2 Revision, filed October 31, 2008 and as amended on November 12, 2008. Verizon Business also requests that the Washington Utilities and Transportation Commission ("Commission") suspend Qwest's proposed revisions to Section 2 of its Access Service Tariff pending an investigation. As grounds therefor, Verizon Business states:

1. Verizon Business is an interexchange carrier ("IXC") under the jurisdiction of the Commission that exchanges intrastate and interstate switched access traffic with Qwest. It is, therefore, a customer of Qwest and would be affected by changes that Qwest proposes to make in its Washington Access Service Tariff.
2. On October 31, 2008, Qwest filed with the Commission a request to modify the Jurisdictional Report Requirements in Section 2 of its Washington Access Service Tariff by establishing a Percent Interstate Usage ("PIU") floor for what it considers to be unidentified Feature Group D ("FGD") terminating traffic. On November

12, 2008, Qwest filed a replacement page to its original filing. Qwest's proposed revisions would result in a higher percentage of traffic being billed at the intrastate rates (which are higher than interstate access rates) than at present, and thereby increase the amounts billed to Verizon Business and other access purchasers. Verizon Business, therefore, has a direct interest in this proceeding.

3. Although Qwest asserts that the tariff changes are being implemented to "reduce misuse of jurisdictional reporting," it has not demonstrated the existence or nature of the problem the tariff revision purports to address, or explained why its proposed solution is appropriate. In addition, it is not clear how the new jurisdictional reporting mechanism would be implemented—for example, how Qwest would determine whether traffic has or "lacks sufficient originating information," what mechanism would be in place to enable carriers to resolve questions over the sufficiency of call originating information, and how any disputes would be resolved before Qwest automatically assigns a jurisdictional factor pursuant to its proposed tariff provision. Because clarity and proper implementation of the tariff are important to carriers such as Verizon Business, who must take service under that tariff, Verizon Business respectfully requests that the Commission suspend and investigate Qwest's proposed tariff changes until these issues are adequately resolved to the satisfaction of Qwest's access customers.

4. The Iowa Utilities Board and the South Dakota Public Utilities Commission have suspended similar tariff filings made by Qwest (IA Docket No. TF-08-180 and SD Docket TC08-127). And the Minnesota Public Utilities Commission opened a docket to conduct an investigation into the proposed tariff; it has requested comments

by December 10, 2008 and reply comments by January 9, 2009. (Docket No. P-421/AM-08-1351).

5. Individuals to receive pleadings on behalf of Verizon Business in this proceeding are as follows:

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WHEREFORE Verizon Business respectfully requests that the Commission grant this objection and suspend Qwest's proposed tariff revisions until such time as the Commission has conducted the necessary investigation and ordered further revisions to Qwest's proposed amendments to Section 2 of its Access Service Tariff.

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Dated this 2nd day of December 2008.

MCI COMMUNICATIONS SERVICES, INC.
d/b/a VERIZON BUSINESS SERVICES



By: _____

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