



I accepted a position with Pacific Bell as a Technology Planner with responsibility for implementing outside plant capital additions. In 2000, I accepted a similar position with U S WEST as a Manager, Tactical Planning. In 2001, I was promoted to a staff position in Technical Regulatory Interconnection Planning for Qwest. In this position, I developed network strategies for interconnection and the unbundling of Qwest's local switches, Signaling System 7 ("SS7") and other switching-related products. My responsibilities also included the development of network strategies based on the evaluation of new technologies. I am one of the network organization's subject matter experts regarding the interconnection and unbundling of network elements required by the Telecommunications Act of 1996. In 2003, I was promoted to my current position as Director, Technical Regulatory in the Network organization. In 2004, the Technical Regulatory group was realigned as part of the Qwest Policy organization. Within the Qwest's Policy organization, in addition to my previous duties, I developed and directed the implementation of network policies. I also represented Qwest in industry technical standards setting groups such as the FCC's Network Reliability and Interoperability Council ("NRIC") and the Network Interconnection Interoperability Forum ("NIIF"). In late 2008, my responsibilities were moved under the Legal organization's Case and Issue Management for Network, although the nature of my duties have remained the same.

3. One of the significant aspects of my duties is to provide testimony in regulatory and court cases related to network issues.

4. As part of my duties, I am familiar with and make frequent use of a database known in the telecommunications industry as the Local Exchange Routing Guide ("LERG").

5. The LERG is a comprehensive routing data output from Telcordia Routing Administration (TRA). LERG data supports the current local exchange network within the

North America Numbering Plan (“NANP”) and identifies reported planned changes in the network. The LERG is primarily designed to be used for routing of calls by service providers (wireless, wireline, inter and intra-exchange, etc.). It also supports functions such as networking planning and engineering, numbering administration, and is used by companies, including many outside of the telecommunications industry, to support a wide range of business operations and planning needs. The LERG has been in existence since 1984 and provides for a common basis for service providers within the NANP to directly report their numbering and routing information. The LERG is supported by integrated and quality-oriented industry processes and is similarly supported by TRA.

6. In other words, the LERG is a database created for and used by the industry to assure, among other things, the proper routing of calls. In order for the LERG to be used effectively and to assure that calls are properly routed from one carrier’s network to that of another carrier, each carrier must keep the LERG updated with information related to its switches and their locations.

7. In or about April 2008, I participated, along with other Qwest personnel, on a conference call with representatives of Pac-West. During the course of that conversation, a Pac-West representative acknowledged that for Qwest territory, Pac-West maintains no switching capability in Washington for the routing of its traffic, which I understand to be primarily traffic routed to Internet Service Providers (“ISPs”).

8. In the past few days, I have accessed the LERG and confirmed that at this time Pac-West is operating no switches in Washington for the routing of ISP traffic, although Qwest’s internal interconnection planning information indicates that Pac-West maintains some switching capacity in Washington that is limited solely to supporting two trunks for E-911 purposes.

9. My examination of the LERG data indicates that the Pac-West switch or switches used to switch traffic originated in Washington are located in Los Angeles, California.

10. It is my experience, having reviewed the networks of several competitive local exchange carriers (“CLECs”) whose business plan is to primarily provide services to ISPs, that such carriers typically locate their Internet equipment such as modems and servers in the same location as they maintain their Internet-based switches.

DATED this \_\_\_\_ day of February, 2009

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Philip A. Linse

Subscribed and sworn to before me this \_\_\_\_\_ day of February, 2009.

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NOTARY PUBLIC

Residing at \_\_\_\_\_

My Commission expires:\_\_\_\_\_