



1           2. At the hearing in this matter on October 26, 2006, I was asked to accept certain  
2 statements, subject to check, during cross-examination. I have checked on the statements that  
3 counsel for Level 3 asked me to accept subject to check and have determined that the  
4 conclusions counsel asked me to accept subject to check are incorrect by significant amounts.  
5 Hereafter, I will address the specific "subject to check" questions.

6           3. On page 597, lines 5-15, the following question and answer were asked and answered:

7           Q. ...translating that to PRIs would be approximately 1,391, if my math is correct. Isn't  
8 that what you would need to do?

9           A. I don't know what the traffic flows are for Level 3. I will accept that if you tell  
10 me that's what the Level 3 traffic flows would indicate would be necessary.

11 Since providing that testimony, I have reviewed the Level 3 traffic flows in Washington. Based  
12 on my review, counsel's assumption that 1,391 PRIs would be necessary to handle Level 3's  
13 traffic is not correct. My analysis, which is based on a fill factor assumed by Mr. Greene and  
14 Level 3's actual minutes of traffic in Washington, indicates that only [ **Begin confidential** ██████████  
15 **end confidential** ] PRIs would be necessary to accommodate the current Level 3 traffic in  
16 Washington.

17           4. On page 598, line 24 to page 599, line 4, the following exchange took place:

18           Q. Assuming its 1300, would you agree that would amount to a price to Level 3 of  
19 somewhere between \$937,000 and \$1.4 million per month simply for PRIs?

20           A. I will accept that subject to check, not having done the calculation myself.

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22 I have reviewed the Level 3 traffic flows and the pricing of PRI service that would be available  
23 to Level 3 based on its volume of traffic. Based on my analysis, the correct calculation would be  
24 [ **Begin confidential** ██████████ **End confidential** ] PRIs multiplied by a PRI cost of \$360 per month,  
25 or [ **Begin confidential** ██████████ **End confidential** ] per month. The \$360 per month rate is the  
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1 average price that QCC pays per PRI in Washington; I believe that, given its level of traffic,  
2 Level 3 would qualify for the same term and volume discounts that QCC qualifies for.

3 5. On page 599, lines 5-9, counsel propounded another question subject to check:  
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5 Q. And if we brought that back on DS3, that volume of traffic, that we would probably  
6 need at least four DS3s per local calling area...

7 A. Subject to check.

8 I have checked the Level 3 overall traffic flows in Washington and do not agree that four DS3  
9 would be necessary for each local calling area. My analysis indicates that a total of [ **Begin**  
10 **confidential** ██████████ **End confidential** ] would be necessary to carry Level 3's traffic from the  
11 local calling areas it serves in Washington to its points of interconnection ("POIs") with Qwest.  
12 The monthly total cost to Level 3 of those DS3s—[ **Begin confidential** ██████████ **End**  
13 **confidential** ]—is based on Qwest intrastate private line tariffs and Mr. Greene's calculation of  
14 how many minutes of traffic a DS3 would carry.

15 6. Finally, on pages 599, lines 10-14, the following question and answer were given:  
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17 Q. So subject to check, the yearly cost of the architecture you are suggesting for Level  
18 3 here ranges from \$13 million to \$ 18 million per year, subject to check.

19 A. Subject to check.

20 Based on my check, the \$13 million to \$18 million per year is not correct. As noted above,  
21 Level 3 would not require 4 DS3s per local calling area nor 1,391 PRIs. My calculation is that  
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