

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PAC-WEST TELECOMM, INC.,)
) Docket No. UT-
 Complainant,)
) AFFIDAVIT OF KIM REGO
 v.)
)
 QWEST CORPORATION,)
)
 Respondent.)
 _____)

STATE OF CALIFORNIA)
) ss
 COUNTY OF SAN JOAQUIN)


My name is Kim Rego. I am of sound mind, am capable of making this affidavit, am over eighteen (18) years of age, and am fully competent to testify to the matters stated herein. I have personal knowledge of each of the facts stated herein, and each is true and correct.

1. I am Director of Customer Relations and Service Delivery for Pac-West Telecomm, Inc. ("Pac-West"). My business address is 4210 Coronado Avenue, Stockton, California 95204.
2. As Director of Customer Relations and Service Delivery I oversee the group responsible for all aspects of network provisioning and operations relating to establishing a customer's service on Pac-West's network, and ongoing network support of the account.
3. One function my group performs is the porting of telephone numbers, these requests by the customer cover porting into Pac-West and away from the customer's prior service provider.
4. Number porting, also referred to as local number portability, allows a customer to retain its existing telephone number(s) when changing local service providers and remains in the same rate center.
5. Customers frequently port their telephone number(s) when they transfer services to Pac-West.

6. The porting of numbers is accomplished via a cooperative process between the local exchange carrier the customer is leaving and the local exchange carrier the customer is obtaining new service from.
7. In the case of Qwest Communication (“Qwest”), Pac-West submits orders to port numbers “out”, or away from Qwest and to Pac-West, using Qwest’s Interconnect Mediated Access Graphic User Interface or “IMA GUI”.
8. On October 24, 2007 I became aware that Qwest had blocked Pac-West’s access to the IMA GUI, thereby preventing Pac-West from porting telephone numbers away from Qwest.
9. Pac-West’s blocked access to the GUI was brought to the attention of Qwest’s Vice President of Carrier Relations, Mr. Steve Hansen on October 24, 2007.
10. During that conversation, Mr. Hansen refused to permit Pac-West access to the IMA GUI. Mr. Hansen did, however, commit to processing number porting orders for one of Pac-West’s customers: Clearwire Corporation. The orders for Clearwire were to be processed by Qwest as a special project meaning they would be handled manually and outside the mechanized process typically used.
11. For local number portability orders related to Clearwire, Mr Hansen referred Pac-West to a Ms. Jean Novak, who is at the regional director level with Qwest.
12. On November 2, 2007, an e-mail was sent at the direction of Pac-West to by it’s porting vendor to Ms. Novak providing information necessary to initiate the porting of a series of telephone numbers for Clearwire.
13. Since the November 2, 2007 e-mail, Ms. Novak has not acknowledged receipt of the e-mail, returned any telephone calls placed to her by Pac-West or otherwise acknowledged receipt of Pac-West’s porting request for Clearwire. As a result, Pac-West has no means of knowing if or when the requested telephone numbers will be ported.
14. Pac-West is unable to process pending porting requests for any other customers and is unable to submit additional porting requests for Clearwire.
15. When using Qwest’s GUI to submit number porting orders, Pac-West typically receives a response in the form of a Firm Order Confirmation from Qwest within one business day and is able to complete a number port within three to five business days.
16. Pac-West’s ability to timely port numbers is critical to serving its customers.
17. Pac-West’s inability to provide new customers an expectation of when the number port will be completed diminishes Pac-West’s credibility as a viable alternative service provider.

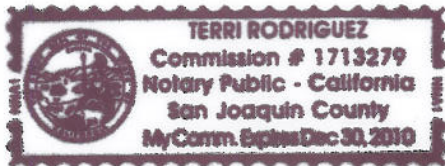
18. Large service requests from potential Pac-West customers are jeopardized if Pac-West is unable to port in Qwest end-user's numbers

This concludes my statement.


Kim Rego

STATE OF CALIFORNIA §
 §
COUNTY OF SAN JOAQUIN §

Subscribed and sworn to before me, TERRI RODRIGUEZ, this 9th day of November, 2007.




Notary Public

(Notary Seal)

State of California)
) ss.
County of San Joaquin)

On November 9, 2007 before me, Terri Rodriguez, Notary Public, personally appeared Kim Rego personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Terri Rodriguez
My Commission Expires: December 30, 2010



-----**OPTIONAL**-----

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