

EXHIBIT B

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-001

REQUEST:

Does QC offer any telecommunications services that QCC utilizes as an input to providing dial-up Internet access services to ISPs that are customers of QCC?

RESPONSE:

If Level 3 defines "telecommunications services" as any tariffed telephone exchange or transport services the answer is yes. QC offers telephone exchange and transport services to QCC and QCC purchases tariffed or catalog services (such as PRIs and private line transport) from Qwest (the ILEC).

Respondent: Larry Brotherson

QWEST CORPORATION
STATE: Washington
DOCKET NO: UT-063006
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INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01-002

REQUEST:

To the extent that Data Request No. 1 applies to QC, please provide:

- (a) the terms, conditions and rates under which QC offers such telecommunications services to QCC;
- (b) starting from the date that QCC first started offering wholesale ISP-dialup in the state of Washington, please provide copies of all invoices from QC to QCC for any such telecommunications services that QC has sold to QCC for the provision of wholesale ISP-dialup in the state of Washington;
- (c) the number of ISP customers QCC serves in the state of Washington;
- (d) the locations by rate center of the billing addresses of these customers;
- (e) the locations by rate center of each ISP's modems and servers
- (f) the locations by rate center of each PM or other QC-provided telecommunications service being used by QCC to provide service to these ISP customers; and
- (g) the physical location of QCC's Cisco AS 400s or equivalent equipment that provides modem functionality for dial-up access to the Internet (what Qwest terms "information access") to QCC's ISP customers.

RESPONSE:

- (a) QC offers telecommunications services to QCC under the same terms conditions and rates as an end user pursuant to QC's tariff and price list.

Respondent: Phil Linse

- (b) Qwest objects to this request on the basis that the information sought is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.
- (c) Qwest is working to gather information responsive to this request and will provide it when it is available.
- (d) Qwest objects to this request on the basis that the information sought is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.
- (e) Qwest objects to this request on the basis that the information sought is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.
- (f) Qwest objects to this request on the basis that the information sought is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

(g) Qwest Corporation ("QC") objects to this data request on the basis that it requests information from QCC, who is not a party to this proceeding. The information requested, to the extent known by QC, is confidential to QCC and may not be disclosed. Further, the request seeks information that is not relevant to the issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, please see Confidential Attachment A.

QWEST CORPORATION

STATE: Washington

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INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-003

REQUEST:

Does QCC purchase from QC any retail or wholesale telecommunications services (such as PRI circuits) that QCC incorporates or otherwise uses in the provisioning of any VoIP services (such as wholesale dial) that it offers to customers of QCC?

RESPONSE:

Yes. QCC purchases tariffed retail services, or exchange services, from Qwest (the ILEC), such as Primary Rate ISDN ("PRI") services purchased to terminate traffic to the PSTN in accordance with the ESP exemption.

Respondent: Larry Brotherson

QWEST CORPORATION
STATE: Washington
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INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01-004

REQUEST:

If the answer to Data Request 3 is "yes," please provide the following information:

- (a) starting from the date that QCC first started offering wholesale VoIP in the state of Washington, please provide copies of all invoices from QC to QCC for any such telecommunications services that QC has sold to QCC for the provision of wholesale VoIP in the state of Washington.
- (b) the number of VoIP customers QCC serves in the state of Washington;
- (d) the locations by rate center of the billing addresses of these customers;
- (e) the locations by rate center of each VoIP customer's [equipment]
- (f) the locations by rate center of each PRI or other QC provided telecommunications service being used by QCC to provide service to these VoIP customers.
- (g) the physical location of QCC's Cisco AS 400s or equivalent equipment converts IP to TDM (and vice versa) to provide functions associated with the exchange of VoIP calls between QC and QCC;

RESPONSE:

- (a) Qwest objects to this request because the information sought is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.
- (b) Qwest is working to gather information responsive to this request and will provide it when it is available.
- (d) Qwest objects to this request on the basis that the information sought is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.
- (e) Qwest is working to gather information responsive to this request and will provide it when it is available.
- (f) Qwest objects to this request on the basis that the information sought is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.
- (g) QCC's Cisco AS 400s do not provide VoIP functions for the exchange of VoIP calls between QC and QCC.

Respondent: Phil Linse

QWEST CORPORATION

STATE: Washington

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INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-005

REQUEST:

Qwest's website at <http://www.qwest.com/wholesale/industrysolution/isp.html> describes "Internet Service Provider (ISP) Industry Solutions" which returns a page that describes the "Internet Service Provider (ISP) Industry Solutions" reproduced in part below:

Internet Service Provider (ISP) Industry Solutions

As your backbone provider, Qwest's diverse products and services can help you expand your service offerings, extend your services to new markets and customers, and grow your profits.

To learn more about our products and services for ISPs, please visit our Prospective Customer Inquiry Form (<http://www.qwest.com/wholesale/pcfeedback.html>) so we can provide you with the proper representative to help answer all your questions.

A. Where Qwest offers such services within its incumbent serving area in Washington, please detail where Qwest maintains a "physical presence" in each local calling area in the state for provision of wholesale ISP dialup services for the products listed in the subparts to this question below. For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "physical presence" in the local exchange calling area.

1. "Digital Signal Level 1 (DSO - V 1.0" available at <http://www.qwest.com/wholesale/pcat/dsl.html>

2. "Voice Termination" available at <http://www.qwest.com/wholesale/pcat/voicetermination.html>

3. "Outbound Voice Services" available at <http://www.qwest.com/wholesale/pcat/ovs.html>.

B. Where Qwest offers such services outside of its incumbent serving area in Washington, please detail where Qwest maintains a "physical presence" in each local calling area in the state for provision of wholesale ISP dialup services for the products listed in the subparts to this question below. For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "physical presence" in the local exchange calling area.

1. "Digital Signal Level 1 (DS1) - V1.0" available at <http://www.qwest.com/wholesale/pcat/dsl.html>

2. "Voice Termination" available at <http://www.qwest.com/wholesale/pcat/voicetermination.html>

3. "Outbound Voice Services" available at <http://www.qwest.com/wholesale/pcat/ovs.html>.

C. Where Qwest offers such services outside of its incumbent serving area in

California, Texas, Illinois, Florida, and Massachusetts does Qwest maintain a "physical presence" in each local calling area in the state for provision of wholesale ISP dialup services for the products listed in the subparts to this question below? If so, for the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "physical presence" in each of the local exchange calling areas in the state it locates such equipment.

1. "Digital Signal Level 1 (DS1) - V1.0" available at <http://www.qwest.com/wholesale/pcat/ds1.html>

2. "Voice Termination" available at <http://www.qwest.com/wholesale/pcat/voicetermination.html>

3. "Outbound Voice Services" available at <http://www.qwest.com/wholesale/pcat/ovs.html>.

RESPONSE:

A. Qwest objects to the request for information regarding physical presence in the state because this information is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Qwest further objects on the grounds that listing the location of all of the equipment that it owns is unduly burdensome.

B. Qwest objects to the request for information regarding physical presence in the state because this information is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Qwest further objects on the grounds that listing the location of all of the equipment that it owns is unduly burdensome.

C. Qwest states that QC does not offer services in the states listed. To the extent that this data request seeks information about services that QCC might provide in these states, Qwest objects to this request in that it seeks information from a non-party, and is not relevant to the issues in this case.

QWEST CORPORATION

STATE: Washington

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INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-006

REQUEST:

Please state the total intrastate access revenues collected by Qwest in the state of Washington for the years 2004 and 2005.

RESPONSE:

Qwest objects to the request for information regarding intrastate access revenues in the state of Washington because it is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

QWEST CORPORATION

STATE: Washington

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INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-007

REQUEST:

Please state the total amounts Qwest has collected for universal service in the state of Washington for the years 2004 and 2005.

RESPONSE:

Qwest objects to the request for information regarding universal service in the state of Washington because it is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-008

REQUEST:

Please state whether Qwest has been found by any state commission to have failed to invest in network infrastructure in any state in its 14 state incumbent territory, such as a failure to invest funds in exchange for approval of mergers, acquisitions or in return for alternative regulation of its services. For any such instances please provide the name of the state, date of such finding, agency or court making such finding, docket number and most recent disposition.

RESPONSE:

Qwest objects to this data request on the basis that it seeks information that is not relevant to the issues in this proceeding, seeks information not relating to Qwest's operations in Washington, and is not reasonably calculated to lead to the discovery of admissible evidence. Qwest further objects to performing Level 3's legal research for it. Qwest is not required to research and produce state commission orders for Level 3 in discovery - to the extent such orders exist, they are a matter of public record in each state and are equally available to Level 3.

QWEST CORPORATION

STATE: Washington

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INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-009

REQUEST:

Please state the total interstate access revenues collected by Qwest in the state of Washington for traffic originating in the state of Washington for the years 2004 and 2005.

RESPONSE:

Qwest objects to the request for information regarding interstate access revenues in the state of Washington because it is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

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INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-010

REQUEST:

Please state the total interstate access revenues collected by Qwest in the state of Washington for traffic terminating in the state of Washington for the years 2004 and 2005.

RESPONSE:

Qwest objects to the request for information regarding interstate access revenues in the state of Washington because it is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

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STATE: Washington

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INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-011

REQUEST:

Please explain the physical and technical characteristics, including the components of a Qwest PRI circuit beginning with the line side of a Qwest End Office Switch and through the point where such circuit terminates to an ISP.

RESPONSE:

Qwest assumes this question assumes that an ISP purchases a PRI directly from Qwest Corporation (QC) in the local calling area in which it is located. QC's PRI service consists of a physical port on a QC end office switch that is defined by the PRI software of the switch. This port is connected to a distribution frame with copper wires. At the distribution frame the copper wires may be cross connected to copper wires called a local exchange loop.

Respondent: Phil Linse

QWEST CORPORATION

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INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-012

REQUEST:

Please explain the physical and technical characteristics, including the components of a Qwest PRI circuit beginning with the line side of a Qwest End Office Switch and through the point where such circuit terminates to an ESP provider of VoIP services.

RESPONSE:

See Qwest's response to request no. 11. The only difference is that in the case of a VoIP provider, the PRI service allows origination and termination in the LCA in which it is purchased. Thus, the traffic can flow in the opposite direction from traffic flowing to an ISP. Otherwise, the connections are the same.

Respondent: Phil Linse

QWEST CORPORATION

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INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01-013

REQUEST:

Qwest's website at <http://www.qwest.com/wholesale/industrysolution/isp.html> describes "Internet Service Provider (ISP) Industry Solutions" which web page contains a link to <http://www.qwest.com/wholesale/pcat/natdial.html> which link returns a page that describes the "Qwest Wholesale Dial" reproduced in part below:

"Dial-up network infrastructure (network-based modems support, V.90 V.92 and V.44 with dial coverage from over 2,500 points-of-presence (PoPs), and covering over 84% of the U.S. population with a local call."

A. Where Qwest offers such services within its incumbent serving area in the state, please detail where Qwest maintains a "point-of-presence (PoP)" as the term is used by Qwest above, in each local calling area in the state for provision of wholesale ISP dialup services. For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "point-of-presence (PoP)" in the local exchange calling area.

B. Where Qwest offers such services outside of its incumbent serving area in the state, please detail where Qwest maintains a "point-of-presence (PoP)" as the term is used by Qwest above, in each local calling area in the state for provision of wholesale ISP dialup services. For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "point-of-presence (PoP)" in the local exchange calling area.

C. Where Qwest offers such services outside of its incumbent serving area in California, Texas, Illinois, Florida, and Massachusetts does Qwest maintain a "point-of-presence (PoP)" as the term is used by Qwest above, in each local calling area in the state for provision of wholesale ISP dialup services? For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "point-of-presence (PoP)" in the local exchange calling area.

D. For each response in A-C above, please specify the precise physical location of Qwest's Network Access Server ("NAS"), which is described on the same webpage as the "Qwest Wholesale Dial" service under the heading "How It Works" which is reproduced for convenience below.

Your end users' PCs dial local access numbers provided by Qwest to connect to local exchange carriers (LECs). Calls are authenticated via a Qwest-provided remote authentication dial-in service (RADIUS) proxy server communicating with your RADIUS authentication server. After an end user is authenticated and the end-user software negotiates the IP connection, the Qwest Network Access Server (NAS) routes end-user packets to the Internet, based on the destination IP address.
(available at <http://www.qwest.com/wholesale/pcat/natdial.html>)

RESPONSE:

A. The following response relates to Qwest Communications Corporation (QCC)

operations in Washington: QCC offers Wholesale Dial in Washington. QCC maintains a point of presence as the term is used by QCC in its description of Wholesale Dial where QCC has purchased local service (e.g. PRI) in each respective local calling area (LCA).

Respondent: Phil Linse

B. The following response relates to Qwest Communications Corporation (QCC) ESP operations in Washington: QCC offers Wholesale dial in Washington. QCC maintains a point of presence as the term is used by QCC in its description of wholesale dial where QCC has purchased local service in each respective local calling area.

Respondent: Phil Linse

C. Qwest states that QC does not offer services in the states listed. To the extent that this data request seeks information about services that QCC might provide in these states, Qwest objects to this request in that it seeks information from a non-party, and is not relevant to the issues in this case.

D. Please see Confidential Attachment A.

Respondent: Phil Linse

QWEST CORPORATION
STATE: Washington
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INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01-014

REQUEST:

Qwest's website at <http://www.qwest.com/wholesale/industrysolution/isp.html> describes "Internet Service Provider (ISP) Industry Solutions" which web page contains a link to <http://www.qwest.com/wholesale/pcat/natdial.html> which link returns a page that describes a "Wholesale Voice Termination Services", reproduced in relevant portion below:

Voice Termination

Product Description

Wholesale Voice Termination Services provide high quality long distance service over our Macro Capacity® Fiber Network. A fundamental component of any size business, long distance service is a key building block in Qwest's virtual enterprise solution, providing a complete suite of communication tools to meet our customers' needs. Voice Termination Services are part of the Qwest Express brand and give the customer the option of an RBOC/ITC or Blended rate. The RBOC/ITC option gives the customer two rates per LATA depending on whether termination is through the RBOC or an ITC. The Blended option gives the customer one rate per LATA. For both types of service Qwest carries and bills for the call from the time the carrier's originating switch signals the Qwest switch to the terminating point of the call.

- A. Please describe the components of Qwest's "Wholesale Voice Termination Services" as offered over Qwest's incumbent network within the state.
- B. Please describe the components of Qwest's "Wholesale Voice Termination Services" as offered in Sprint's incumbent territory within the state.
- C. Please describe the components of Qwest's "Wholesale Voice Termination Services" as offered in Verizon's incumbent serving territory within the state.
- D. Please describe the components of Qwest's "Wholesale Voice Termination Services" as offered in SBC's (n/k/a AT&T's) incumbent serving territory outside of the state.
- E. Please describe the components of Qwest's "Wholesale Voice Termination Services" as offered in Verizon's incumbent serving territory (n/k/a AT&T's) outside of the state.
- F. Please describe the components of Qwest's "Wholesale Voice Termination Services" as offered in BellSouth's incumbent serving territory (n/k/a AT&T's) outside of the state.
- G. Does Qwest offer the "Wholesale Voice Termination Services" as an input to VoIP providers seeking to terminate VoIP Calls to Qwest's incumbent network in the state? If so, please:

1. Please detail where Qwest maintains a "point-of-presence (PoP)" as

the term is used by Qwest in the quoted portions reflected in Level 3 Data Request 14 above, in each local calling area in the state for provision of such Wholesale Voice Termination Services. For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "point-of-presence (PoP)" in the local exchange calling area.

H. Does Qwest offer the "Wholesale Voice Termination Services" as an input to VoIP providers seeking to terminate VoIP Calls to Sprint's incumbent network in the state? If so, please:

I. Please detail where Qwest maintains a "point-of-presence (PoP)" as the term is used by Qwest in the quoted portions reflected in Level 3 Data Request 14 above, in each local calling area in the state for provision of such Wholesale Voice Termination Services. For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "point-of-presence (PoP)" in the local exchange calling area.

J. Does Qwest offer the "Wholesale Voice Termination Services" as an input to VoIP providers seeking to terminate VoIP Calls to Verizon's incumbent network in the state? If so:

1. Please detail where Qwest maintains a "point-of-presence (PoP)" as the term is used by Qwest in the quoted portions reflected in Level 3 Data Request 14 above, in each local calling area in the state for provision of such Wholesale Voice Termination Services. For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "point-of-presence (PoP)" in the local exchange calling area.

K. Where Qwest offers such "Wholesale Voice Termination Services" outside of its incumbent serving area in California, Texas, Illinois, Florida, and Massachusetts does Qwest maintain a "point-of-presence (PoP)" as the term is used by Qwest in the quoted portions reflected at the beginning of Data Request No. 14 above, in each local calling area in the state for provision of wholesale ISP dialup services? For the purposes of this request, describe and name the physical facility or service that Qwest considers to constitute a "point-of-presence (PoP)" in the local exchange calling area.

L. For each response in A-H (including subparts) above, please specify the precise physical location of NAS, which is described on the same webpage as the "Qwest Wholesale Dial" service under the heading "How It Works" which is reproduced for convenience below.

Your end users' PCs dial local access numbers provided by Qwest to connect to local exchange carriers (LECs). Calls are authenticated via a Qwest-provided remote authentication dial-in service (RADIUS) proxy server communicating with your RADIUS authentication server. After an end user is authenticated and the end-user software negotiates the IP connection, the Qwest Network Access Server (NAS) routes end-user packets to the Internet, based on the destination IP address. (available at <http://www.qwest.com/wholesale/pcat/natdial.html>)

M. To the extent that Qwest does not use a "Network Access Server (NAS)" to provide supportive or constituent functionalities related to "Wholesale Voice Termination Services" please provide the name, manufacturer, model, and location of any device(s) that provide IP to TDM conversion, and/or call control and/or call routing, and/or SS7, to the extent that Qwest provides such functionalities in connection such service.

N. Please specify the rates Qwest offers for the "The Blended option gives the customer one rate per LATA" for "Wholesale Voice Termination Services" Qwest offers in the state of Washington. Include the tariff, rate sheet, or

individual case basis filings under which such are offered within the state.

O. Please specify the rates Qwest offers for the "The RBOC/ITC option gives the customer two rates per LATA depending on whether termination is through the RBOC or an ITC." for "Wholesale Voice Termination Services" Qwest offers in the state of Washington. Include the tariff, rate sheet, or individual case basis filings under which such are offered within the state.

P. For Questions A-K above, please provide the same information if for any portion of any response to such questions Qwest contends that QCC or any other Qwest Affiliate provides in whole or part such services (whether regulated or not) or, in whole or part, owns, operates or controls directly or indirectly any device, feature or functionality used in the provision, sale, or offering of such Wholesale Voice Termination Services.

Q. If in response to Data Request No. 14(Q) above, Qwest contends that QCC or any other Qwest Affiliate provides in whole or part such services (whether regulated or not) or, in whole or part, owns, operates or controls directly or indirectly any device, feature or functionality used in the provision, sale, or offering of such service requested in Data Request No. 14 please provide copies of all invoices submitted by Qwest to QCC or such other Qwest Affiliate related to such entity's provision or offering of Wholesale Voice Termination Services.

RESPONSE:

A. Qwest Communication Corporation's LD Wholesale Voice Termination Services is not offered over QC incumbent network within the state of Washington except to the extent that QCC purchases access services pursuant to QC's access tariff (e.g. Feature Group D) for the termination of long distance voice traffic.

Respondent: Phil Linse

B. Qwest Communication Corporation's LD Wholesale Voice Termination Services is offered in Sprint's incumbent territory within the state of Washington where QCC purchases access services pursuant to Sprint's access tariff (e.g. Feature Group D) for the termination of long distance voice traffic.

Respondent: Phil Linse

C. Qwest Communication Corporation's LD Wholesale Voice Termination Services is offered in Verizon's incumbent territory within the state of Washington where QCC purchases access services pursuant to Verizon's access tariff (e.g. Feature Group D) for the termination of long distance voice traffic.

Respondent: Phil Linse

D. Qwest states that QC does not offer service outside of its 14-state incumbent serving territory. To the extent that this data request seeks information about services that QCC might provide in outside of the state of Washington, Qwest objects to this request in that it seeks information from a non-party, and is not relevant to the issues in this case.

E. Qwest states that QC does not offer service outside of its 14-state incumbent serving territory. To the extent that this data request seeks information about services that QCC might provide in outside of the state of Washington, Qwest objects to this request in that it seeks information from a non-party, and is not relevant to the issues in this case.

F. Qwest states that QC does not offer service outside of its 14-state incumbent serving territory. To the extent that this data request seeks information about services that QCC might provide in outside of the state of

Washington, Qwest objects to this request in that it seeks information from a non-party, and is not relevant to the issues in this case.

G. Qwest objects to the request for information regarding physical presence in the state because this information is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Qwest further objects on the grounds that listing the location of all of the equipment that it owns is unduly burdensome.

H. QCC's Wholesale Voice Termination Service is a long distance service that may be purchased by end users such as VoIP providers for the termination of voice services. Subscribers of Voice Termination Service pay long distance rates for the termination of their voice services. Wholesale Voice Termination Service is a long distance service provided by QCC Long Distance where the traffic destined for Sprint's incumbent network terminates over tariffed access facilities purchased from Sprint's incumbent in Washington.

Respondent: Phil Linse

I. Qwest objects to the request for information regarding physical presence in the state because this information is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Qwest further objects on the grounds that listing the location of all of the equipment that it owns is unduly burdensome.

J. Qwest objects to the request for information regarding physical presence in the state because this information is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Qwest further objects on the grounds that listing the location of all of the equipment that it owns is unduly burdensome.

k - Qwest states that QC does not offer services in the states listed. To the extent that this data request seeks information about services that QCC might provide in these states, Qwest objects to this request in that it seeks information from a non-party, and is not relevant to the issues in this case.

l - The following response relates to Qwest Communications Corporation (QCC) ESP operations in Washington: See response to request no. 13 D.

Respondent: Phil Linse

M. Qwest objects to this data request on the basis that it is overly broad and unduly burdensome.

N. Qwest objects to providing this information as it pertains to a service offered by QCC who is not a party to this proceeding and is not relevant to the issues raised in this proceeding.

O. Qwest objects to providing this information as it pertains to a service offered by QCC who is not a party to this proceeding and is not relevant to the issues raised in this proceeding.

P. To the extent that Qwest objected to subparts A - K, Qwest incorporates those objections herein.

Q. See the objections previously filed in response to this request.

QWEST CORPORATION

STATE: Washington
DOCKET NO: UT-063006
CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor
INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01-015

REQUEST:

Please state whether Qwest requires any "Internet Service Provider (ISP)" as Qwest uses that term on its web pages (such as <http://www.qwest.com/wholesale/pcat/natdial.html>) that purchases a "Qwest Wholesale Dial" product to:

- A. Collocate any equipment at a Qwest "Network Access Server (NAS)" location;
- B. Physically locate modems or equipment provides the modem functionality in the state?
- C. Place, operate, own, maintain, locate or collocate modems, modem banks, or equipment providing modem functionality in each Qwest local calling area in the state (regardless of whether such physical location occurs within, near, inside or outside of a Qwest Central Office or Serving Wire Center and regardless of whether such physical location is, is not, may be, could be, or might be regulated under local, state or federal law)?
- D. Place, operate, own, maintain, locate or collocate proxy RADIUS server(s), or such equipment providing equivalent functionality in each Qwest local calling area in the state (regardless of whether such physical location occurs within, near, inside or outside of a Qwest Central Office or Serving Wire Center and regardless of whether such physical location is, is not, may be, could be, or might be regulated under local, state or federal law)?
- E. For Questions A-D above, please provide the same information if for any portion of any response to such questions Qwest contends that QCC or any other Qwest Affiliate is responsible in whole or in part for the provision of Qwest Wholesale Dial or for any requirements or restrictions requested in Data Request No. 15:
- F. If in response to Data Request No. 15(E) above, Qwest contends that QCC or any other Qwest Affiliate is responsible in whole or in part for the provision of Qwest Wholesale Dial or for any requirements or restrictions requested in Data Request No. 15 please provide copies of all invoices submitted by Qwest to QCC or such other Qwest Affiliate for any such inputs to Qwest Wholesale Dial Services that QCC or such other Qwest Affiliate purchases from Qwest for purposes of offering or providing such Wholesale Dial Services.

RESPONSE:

- A.- E. Qwest is working to gather information responsive to this request and will provide it when it is available.
- F. Qwest objects to this request on the basis that the information sought is not relevant to any issues in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

QWEST CORPORATION

STATE: Washington
DOCKET NO: UT-063006
CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor
INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01-016

REQUEST:

Please list each local calling area within the state in which QCC maintains a physical presence as defined by QC in Section 4-Definitions VNXX Traffic (Issue No. 3B) of the Qwest's proposed changes to the Parties' interconnection agreement.

RESPONSE:

QCC, under the ESP exemption, typically buys local service (PRI or its equivalent) in the LCA where it obtains local phone numbers (the numbers are included with the local exchange service purchased by QCC) instead of buying interconnection services as a CLEC under an Interconnection Agreement. QC does not assign VNXX codes. QC adheres to the numbering guidelines and properly assigns telephone numbers within the local calling area. Local numbers are assigned to each dedicated local PRI circuit that is provisioned from each local calling area to the customer, QCC. QC knows that its PRI customer is located in the local calling area, or has a physical presence in that calling area by virtue of purchasing the tariffed local service and combining it with a tariffed or catalogued private line transport service. A QC customer must purchase local service to obtain a local number. If such customers have no local dial-up number, then a dial-up end user would have to dial a "1+" call or an 8XX number to connect to QCC.

QCC maintains a physical presence in the following local calling areas in Washington:

Aberdeen, Acme, Auburn, Bellevue, Bellingham, Birch Bay, Blaine, Bremerton, Centralia, Colfax, Colville, Custer, Deming, Des Moines, Everson, Enumclaw, Ephrata, Ferndale, Hoodspport, Issaquah, Kent, Laurel, Lynden, Maple Falls, Moses Lake, Olympia, Omak, Oroville, Pasco, Pomeroy, Port Angeles, Port Townsend, Puyallup, Renton, Seattle, Silverdale, Spokane, Sumner, Sumas, Tacoma, Vancouver, Waverly, Walla Walla, Yakima.

Respondent: Larry Brotherson

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-017

REQUEST:

Of those states in which Qwest operates as an ILEC (as defined in Section 251(h) of the Act), list the states where Qwest combines CLEC local and toll (IntraLATA and InterLATA) traffic on a single trunk?

RESPONSE:

The following response relates to Qwest Corporation (QC) operations in Washington: QC does not combine switched access and local traffic on a single trunk group for any CLEC. QC may combine jointly provided switched access and local traffic to a CLEC on a single trunk group. However, QC does allow IXCs to combine their toll (IntraLATA and InterLATA) and local traffic (to the extent the IXC also operates as a CLEC) on a single Feature Group D trunk.

Respondent: Phil Linse

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-018

REQUEST:

For each state in which Qwest operates as an ILEC (as defined in Section 251(h) of the Act), please identify each CLEC with which Qwest (a) exchanges local and toll (IntraLATA and InterLATA) traffic on a single trunk group and (b) uses a Percent Local Use (PLU) or similar method of establishing the apportionment of local vs. toll traffic on the combined trunk group.

RESPONSE:

Qwest Corporation (QC) responds with the following regarding its operations in Washington: QC does not combine switched access and local traffic on a single trunk group and does not use a Percent Local Use ("PLU") or similar method of establishing the apportionment of local versus toll traffic on a combined trunk group with any carrier. However, QC and a CLEC may apply a PLU factor to No-CPN traffic to address the absence of CPN. In addition, QC allows IXCs to combine their toll (IntraLATA and InterLATA) and local traffic (to the extent the IXC also operates as a CLEC) on a single Feature Group D trunk.

Respondent: Phil Linse

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01-019

REQUEST:

For each state in which a Qwest CLEC affiliate combines local and toll (IntraLATA and InterLATA) traffic on a single trunk group, please state whether Qwest's CLEC affiliate uses a Percent Local Use (PLU) or similar other method of establishing the apportionment of local vs. toll traffic on the combined trunk group.

RESPONSE:

Qwest objects to this data request on the basis that it seeks information about a Qwest CLEC affiliate which is not relevant to the issues raised in this arbitration proceeding in Washington.

QWEST CORPORATION
STATE: Washington
DOCKET NO: UT-063006
CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor
INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01-020

REQUEST:

Please explain why the following contract sections contained in Qwest's Washington SGAT prohibit Level 3 from exchanging VoIP Calls, ISP-bound traffic and terminating traditional 1+ dialed Interexchange traffic (also known as terminating "IP in the middle" traffic) over Level 3's existing co-carrier network using billing factors in the state. The full SGAT is available at: <http://www.qwest.com/wholesale/clecs/sgatswireline.html>, scroll down to "Washington" and Choose "SGAT 6/25/02", which will return a word document containing these (and other provisions).

7.2.2.9.3 Separate trunk groups may be established based on Billing, signaling, and network requirements. The following is the current list of traffic types that require separate trunk groups, unless specifically otherwise stated in this Agreement.

- a) Directory assistance trunks (where the Switch type requires separation from operator services trunks);
- b) 911/E911 trunks;
- c) Operator services trunks (where the Switch type requires separation from Directory Assistance trunks)
- d) Mass calling trunks, if applicable.

7.2.2.9.3.1 Exchange Service (EAS/local), Exchange Access (IntraLATA toll carried solely by Local Exchange Carriers) and Jointly Provided Switched Access (InterLATA and IntraLATA toll involving a third-party IXC) may be combined in a single LIS trunk group or transmitted on separate LIS trunk groups. If traffic is combined, Section 7.3.9 of this Agreement applies.

7.2.2.9.3.2 Exchange Service (EAS/Local) traffic and Switched Access traffic including Jointly Provided Switched Access traffic, may be combined on the same trunk group. If combined, the originating Carrier shall provide to the terminating Carrier, each quarter, Percent Local Use (PLU) factor(s) that can be verified with individual call record detail. Call detail or direct jurisdictionalization using Calling Party Number information may be exchanged in lieu of PLU if it is available.

And

7.3.9 To the extent a Party combines Exchange Service (EAS/Local), Exchange Access (IntraLATA Toll carried solely by Local Exchange Carriers), and Jointly Provided Switched Access (InterLATA and IntraLATA calls exchanged with a third-party IXC) traffic on a single LIS trunk group, the originating Party, at the terminating party's request will declare quarterly PLU(s). Such PLU's will be verifiable with either call summary records utilizing Calling Party Number information for jurisdictionalization or call detail samples. The terminating Party should apportion per minute of use (MOU) charges appropriately.

RESPONSE:

Section 7.2.2.9.3.1 of the current Washington SGAT does allow the combining of "Exchange Service (EAS/local), Exchange Access (IntraLATA toll carried by Local Exchange Carriers) and Jointly Provided Switched Access" over a single LIS trunk group. However, it does not allow Level 3 to deliver "terminating traditional 1+ dialed Interexchange traffic" over LIS trunks. Section 7.2.2.9.3.2 of the SGAT does allow the combining of all traffic on a single trunk group however, due to the fact that LIS trunks do not have the capability to produce records for the billing of switched access, this traffic must be combined over FGD interconnection trunks.

Although the SGAT does allow for a limited use of billing factors (e.g. PLU when no CPN is available), current Qwest practice is to bill using measurements of actual traffic when possible. The current SGAT contains no language providing for billing based entirely on factors as Level 3 is now proposing.

Respondent: William Easton

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-001

REQUEST:

Please admit that if the Qwest contract positions are adopted and Level 3's current network configuration remains as it is today, Level 3 will not be able to receive ISP-bound traffic from any Qwest Washington rate centers where the ISP-bound traffic meets Qwest's definition of VNXX.

RESPONSE:

Admit. If Level 3's traffic is not local, then under Qwest's language it will not be treated as local. Level 3 would not be able to receive VNXX traffic as local traffic under Level 3's current network configuration. That does not mean that traffic that would be VNXX under Qwest's language could not be delivered to Level 3 under some other arrangement for interexchange traffic.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-002

REQUEST:

Please admit that QCC is a subsidiary of QCI.

RESPONSE:

Deny. QCC is a subsidiary of Qwest Services Corporation, which is a subsidiary of Qwest Communications International Inc., ("QCII").

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-003

REQUEST:

Please admit that QC is a subsidiary of QCI.

RESPONSE:

Deny. QC is a subsidiary of Qwest Services Corporation, which is a subsidiary of Qwest Communications International Inc., ("QCII").

QWEST CORPORATION

STATE: Washington
DOCKET NO: UT-063006
CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor
INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01A-004

REQUEST:

Please admit that Qwest's requirement for Feature Group D billing is not technically necessary for the transmission and routing of locally dialed calls from QC to Level 3.

RESPONSE:

Admitted, subject to the following explanation. The term "locally dialed calls" can refer to traffic that is truly local (i.e., where the calling and called parties are physically located in the same local calling area). However, in other cases, Level 3 uses that term as a euphemism for VNXX traffic (i.e., where Level 3 gives an ISP a local telephone number but the customer is not physically located in the local calling area associated with the number).

For the first category of traffic (truly local), it is appropriate to use LIS as the transport service. For the second category (VNXX), the traffic should be handed off to an IXC, who would then purchase access service (which could include Feature Group D). Feature Group D is an access service provided to interexchange carriers (IXCs) so that the IXCs may receive its customer's traffic based on a long distance dialing pattern. Thus, in that situation, IXC customers would not use a local dialing pattern to access the IXC's platform (and the traffic would, therefore, not be "locally dialed").

That said, it is certainly possible from a technical perspective for locally dialed traffic of both types to be carried on trunks other than FGD trunks. Whether it is legally appropriate and the intercarrier compensation that should apply to VNXX traffic are different matters.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-005

REQUEST:

Please admit that Qwest's requirement for Feature Group D billing is not technically necessary for the transmission and routing of calls delivered by Level 3 to Qwest customers where Level 3 terminates such calls to tandems or end offices serving the called NPA-NXX codes.

RESPONSE:

Denied. Feature Group D is an access service provided to interexchange carriers (IXCs) so that the IXC may receive its customer's traffic based on a long distance dialing pattern. An IXC would receive traffic over Feature Group D that is routed from Level 3 to Qwest's tandem based on Level 3's customer's Presubscribed Interexchange Carrier (PIC). The IXC would then route the traffic to Qwest for termination to the Qwest customer of the called NPA-NXX.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-006

REQUEST:

Please admit that Qwest billing systems cannot automatically determine the physical location of a person making a circuit switched telephone call.

RESPONSE:

Denied. The meaning of the term "automatically" is unclear. Although Qwest billing systems do not produce bills in real time, Qwest's billing systems typically render bills associated with service that is provisioned to a physical location, and the general physical location (i.e., which city or local calling area) is usually determined by the calling parties' telephone number.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-007

REQUEST:

Please admit that Qwest billing systems cannot automatically determine the physical location of a person receiving a circuit switched telephone call.

RESPONSE:

Admitted subject to the following explanation. Qwest does not typically bill its end users for receiving a circuit switched call so it would be unusual for Qwest's billing system to need to know that information. The originating carriers' billing systems typically render bills associated with service that is provisioned to a physical location. While it is true that Qwest's billing system does not know the precise physical location of a called customer, it does know the general physical location of one of its customers by the customer's telephone number (which usually identifies the local calling within which the billed customer is located). One of the problems with VNXX is that it results in customers, who have no physical connection to a local calling area, receiving telephone numbers that make it appear that they do have such a connection. That is one of the reasons why Qwest opposes VNXX.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-008

REQUEST:

Please admit that Qwest billing systems cannot automatically determine the physical location of a person making a VoIP call.

RESPONSE:

Qwest can neither admit nor deny this request. A true VoIP call originates in IP protocol over a broadband connection directly to the internet. If by Qwest's billing systems, Level 3 means the QC billing systems that tracks traffic on the PSTN, then yes, QC would be unable to track the physical location of where the VoIP caller located when he or she made a VoIP call. QC can, however, know the physical location at which the traffic is converted from IP to TDM protocol and is delivered to the PSTN.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-009

REQUEST:

Please admit that Qwest billing systems cannot automatically determine the physical location of a person receiving a VoIP call.

RESPONSE:

Qwest can neither admit nor deny this request. Terminating VoIP traffic can either be routed to another VoIP end user over broadband or to an end user on the PSTN. If a VoIP call is received by another VoIP end user over broadband, Qwest's PSTN network would not be involved, and Qwest's billing systems would not be involved in any manner. If a VoIP call is received by a Qwest PSTN customer (the VoIP traffic must meet Qwest's VoIP definition i.e. a VoIP call must originate in IP and then be converted into traditional TDM protocol for termination on the PSTN), the PSTN customer has a loop connected to a switch on the PSTN and Qwest billing systems can determine the location of the person receiving the call.

QWEST CORPORATION

STATE: Washington
DOCKET NO: UT-063006
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INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01A-010

REQUEST:

Please admit that Qwest's end office and tandem switches do not store any information indicating the address or location of any end user's premises.

RESPONSE:

Qwest can neither admit nor deny this request.

The telephone numbers that Qwest uses for call routing purposes are assigned to its end users based on NPA-NXXs associated with specific local calling areas in the state. Thus, Qwest's end office and tandem switches process calls based on information that that in most, but not all, cases identifies the general geographic area within which the end users are located. While switches do not route calls based on specific addresses stored within the switches, the routing and connecting function of switches are based on information concerning a customer's address and location located in other company databases. Furthermore, installation facts, repair facts, billing information and other related information related to specific customers are contained in company databases that are based on customer address and location information.

QWEST CORPORATION

STATE: Washington

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CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-011

REQUEST:

Please admit that Qwest's end office and tandem switches route traffic to other switches and/or to end users on the basis of the dialed telephone number, without any reference to information regarding the address or location of any end user's premises.

RESPONSE:

Qwest can neither admit nor deny this request.

The telephone numbers that Qwest uses for call routing purposes are assigned to its end users based on NPA-NXXs associated with specific LCAs in the state. Thus, Qwest's end office and tandem switches route traffic that in most, but not all, cases identifies the geographic location by local calling area within which the end user is located.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-012

REQUEST:

Please admit that Qwest's call routing systems never sample any data regarding the address or location of any end user's premises for purposes of routing a call.

RESPONSE:

Qwest can neither admit nor deny this request for the same reasons as set forth in Qwest's responses to Requests for Admission Nos. 10 and 11.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-013

REQUEST:

Please admit that Qwest does not impose an additional per minute of use charge to calls made by Qwest 1FR customers to NPA-NXX numbers that appear local to the rate center in which such calls originate, but which calls terminates to Level 3 facilities located outside the local calling area in which the call originates.

RESPONSE:

Denied subject to the following explanation. The calls described are long distance calls and Qwest would be entitled to originating access. However, Qwest assumes that local telephone companies that obtain telephone numbers from NANPA will assign those telephone numbers pursuant to NANPA guidelines (i.e., that they provide them to customers located within the local calling area associated with the telephone number assigned). If the telephone numbers are properly assigned, no per MOU charge would be necessary.

QWEST CORPORATION
STATE: Washington
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INTERVENOR: Level 3 Communications, LLC
REQUEST NO: L3C 01A-014

REQUEST:

Please admit that in the state of Iowa Qwest offers a transit service over which it "commingles", or mixes together wireline and wireless traffic including both interstate and intrastate telephone calls on common trunks before transmitting it to third party carriers including INS.

RESPONSE:

Qwest objects to this request for admission. What Qwest has been ordered to do in Iowa is not relevant to the disputed issues in this proceeding in Washington.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-015

REQUEST:

Please admit that in the state of Iowa Qwest offers a transit service over which it "commingles", or mixes together wireline and wireless traffic including both interstate and intrastate telephone calls on "local" trunks before transmitting it to third party carriers including INS.

RESPONSE:

Qwest objects to this request for admission. What Qwest has been ordered to do in Iowa is not relevant to the disputed issues in this proceeding in Washington.

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-063006

CASE DESCRIPTION: In the Matter of Level 3 Comm., LLC's Petition for Arbitration Pursuant to Section 252(B) of the Comm. Act of 1934, as Amended by the Telecomm. Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Cor

INTERVENOR: Level 3 Communications, LLC

REQUEST NO: L3C 01A-016

REQUEST:

Please admit that in the state of Iowa Qwest offers a transit service over which it "commingles", or mixes together wireline and wireless traffic including both interstate and intrastate telephone calls but not over Feature Group D trunks (as Qwest uses that term) before transmitting it to third party carriers including INS.

RESPONSE:

Qwest objects to this request for admission. What Qwest has been ordered to do in Iowa is not relevant to the disputed issues in this proceeding in Washington.