Qwest
Spirit of Service

January 27, 2005

Lynn Kellas
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To: Lynn Kellas

Announcement Date:	January 27, 2005
Effective Date:	Immediately
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Notification Category:	Product Notification
Target Audience:	CLEC
Subject:	VNXX on LIS Trunks

Local Interconnection Service (LIS) trunks are to be used only for the mutual exchange of Exchange Service (Local), Exchange Access, and Jointly Provided Switched Access Services. Calls that originate in one local calling area and terminate to an end user located in another local calling area are not Exchange Service calls, regardless of the NPA-NXX used for those calls, and should properly be treated as long distance calls. Therefore, these types of calls should be rated using Qwest's Switched Access tariffs with appropriate provisioning of interexchange transport.

Qwest has become aware that Electric Lightwave LLC is utilizing LIS trunking for the termination of inappropriate long distance traffic. This inappropriate use of LIS trunking is achieved by obtaining local NPA-NXXs and filing the NPA-NXXs in the Local Exchange Routing Guide (LERG), to give the appearance of a local dialing pattern for these intraLATA or interLATA toll calls. The industry now refers to this type of toll traffic as Virtual NXX (or "VNXX") traffic. **No interconnection agreement between Qwest and any party permits or requires the exchange of VNXX traffic, and LIS trunking should not be utilized for the exchange of VNXX traffic. This restriction includes Single Point of Presence (SPOP) LIS trunking arrangements.**

Please see the attached **VNXX** service example.

It is Electric Lightwave LLC's responsibility to ensure that VNXX traffic is not exchanged via LIS trunking arrangements. To resolve any potential misuse of LIS trunking arrangements, Electric Lightwave LLCcan take the following step:
- You can modify your assignment of telephone numbers to your end-user customers to ensure that they are only receiving a phone number with an NXX assigned to the rate center where they are physically located. This would modify the dialing patterns (to 1+) for your current VNXX traffic and either migrate the traffic from LIS to tariffed Switched Access Feature Group D trunks for interLATA traffic or appropriately use the LIS trunking if the traffic is Exchange Access traffic.

EXHIBIT B

By this letter, Qwest is initiating a dispute with Electric Lightwave LLC pursuant to the dispute resolution provisions of Electric Lightwave LLC's interconnection agreement with Qwest. Qwest requires that Electric Lightwave LLCcease its use of VNXX architecture such that Qwest is forced to send VNXX traffic to Electric Lightwave LLC. In addition, Qwest will be taking the following steps:

1. Cessation of payment of reciprocal compensation for VNXX traffic. Should Electric Lightwave LLC dispute Qwest's findings with respect to the determination of VNXX traffic versus Exchange Service, Exchange Access or Jointly Provided Switched Access traffic, Qwest will, in good faith, work with Electric Lightwave LLC to resolve that dispute;

2. Continuation of the Dispute Resolution process in Electric Lightwave LLC's interconnection agreement with Qwest, including but not limited to filing complaints regarding this dispute with the appropriate state regulatory agency; and

3. Any other appropriate actions that Qwest may deem necessary to cease the exchange of VNXX traffic with Electric Lightwave LLC and appropriately compensate Qwest for use of its facilities. Qwest does not waive and specifically reserves any claims, rights and actions it may have against Electric Lightwave LLC regarding the exchange of VNXX traffic, including but not limited to seeking compensation for Electric Lightwave LLC;s use of Qwest facilities in exchanging this interexchange VNXX traffic.

Therefore, as discussed above, this letter serves to open the applicable dispute timeframes in Electric Lightwave LLC's interconnection agreement with Qwest. Qwest must receive written confirmation no later than February 15, 2005, that Electric Lightwave LLC has either ceased forcing Qwest to exchange VNXX traffic with Electric Lightwave LLC or a specific date upon which Electric Lightwave LLC will cease doing so. If Electric Lightwave LLC fails to provide this written notice by February 15, 2005, to Dan Hult, Director, Carrier Relations, at dan.hult@qwest.com or at 1314 Douglas Street, Omaha, NE 68102, Qwest will continue to pursue all of the actions discussed above, including but not limited to filing of complaints with the appropriate regulatory agencies. It is necessary that Electric Lightwave LLC and Qwest begin working immediately on a cooperative solution that follows the requirements of the interconnection agreement between Electric Lightwave LLC and Qwest. Please work with Dan Hult as Qwest's initial contact for this dispute, who can be reached at dan.hult@qwest.com. Thank you in advance for your cooperation on this issue.

Best regards,

Steven Hansen
Vice President – Carrier Relations
Wholesale Markets
Qwest Services Corporation

cc: , Cindy Bell
Lashon Vincent

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process.

Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

If you would like to unsubscribe to mailouts please go to the "Subscribe/Unsubscribe" web site and follow the unsubscribe instructions. The site is located at:
http://www.qwest.com/wholesale/notices/cnla/maillist.html

VNXX SERVICE EXAMPLE

LCA 1
(970) 111, 112

LCA 2
(303) 113, 114

D
(970) 111-XXXX

Call A to D
Permissible
as a Local Call

CLEC
Switch

Call A to E
Impermissible

E

VNXX
(970) 111-XXXX

(The CLEC EU is in a
different Local Calling
Area (LCA) than the
rate center associated
with its telephone
number in LERG)

POI

A
(970) 112-XXXX

Qwest
EO

Qwest
AT

LIS facility

Qwest facilities ————
CLEC facilities - - - - - - -

Exchange
Boundary