

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

TSS DIGITAL SERVICES, INC.,

Petition For Enforcement of its
Interconnection Agreement with Qwest
Corporation (f/k/a U S WEST
Communications, Inc.,) Pursuant to
WAC 480-07-650

Docket No. UT-073042

JOINT NARRATIVE IN SUPPORT OF
SETTLEMENT AGREEMENT

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

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ACCOUNTS MANAGEMENT


- 1 Pursuant to WAC 480-07-740(2), this Narrative Supporting Settlement Agreement (“Narrative”) summarizes the confidential Settlement Agreement that is being filed concurrently with this Narrative. It is not intended to modify any terms of the Settlement Agreement.
- 2 This docket concerns disputes between TSS Digital Services, Inc. (“TSS”) and Qwest Corporation (“Qwest”) concerning Qwest’s billing on various accounts, as set forth in TSS’s petition for enforcement (“petition”).
- 3 TSS and Qwest have agreed to settle and compromise the disputes by entering into a

confidential Settlement Agreement. The Settlement Agreement resolves the past issues in Washington.


- 4 Under the terms of the Settlement Agreement, Qwest agrees to credit a confidential sum to TSS, and TSS agrees to pay a portion of the disputed amounts. Both Parties agree to release certain claims that they have against each other.
- 5 This matter is within the jurisdiction of the Commission. The Settlement Agreement resolves the issues raised in TSS's petition. The Parties assert that the Agreement is in the public interest because the complaint generally raises intercarrier issues that are specific to the Parties and do not directly impact consumers or other carriers. Early resolution of the Parties' dispute conserves limited Party and Commission resources that would otherwise be devoted to litigating TSS's claims.
- 6 TSS and Qwest have filed a joint motion requesting expedited Commission approval of the confidential Settlement Agreement. The Parties do not believe that a hearing on the Settlement Agreement is necessary but will provide witnesses in support of the Settlement if requested to do so by the Commission.

DATED this 17th day of January, 2008.

Qwest Corporation


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