

Docket No. UT-053036

EXHIBIT A

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-000

REQUEST:

Does Qwest rate calls by any method other than using the telephone numbers of the calling and called parties? If so, please identify and describe each such method.

RESPONSE:

In the majority of cases Qwest rates calls based upon the geographic assignment of the calling and called party telephone numbers and the associated local rate center configuration. Qwest rates calls according to the dialed digits employing NPA-NXX, but not exclusively. For example, 8XX, N11 (411, 911), 0+ and 0-, 00, 101XXXX+ are routed and rated according to the standard designations of the public switched network. Another exception to this would be the rating of FX service, which constitutes less than 0.2% of Qwest's Washington access lines. Foreign Exchange (FX) service is a combination of rate elements from the Local Exchange tariffs and Private Line Transport tariffs or price lists. The customer purchases an FX connection in the local calling area in which the customer seeks a local number. With FX service, the Qwest FX customer buys a local connection in the Local Calling Area ("LCA") it wants local access to at tariffed local exchange rates and bears the full financial responsibility, at Private Line Transport tariffed rates, to transport the call back to the LCA where the call is answered.

Respondent: Larry Brotherson

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-001

REQUEST:

Does Qwest provide dial-up Internet access service in Washington? If so, please provide the following information:

- a. The name(s) of such service and the tariff, price list, or contract provisions governing that service; and
- b. The physical location of each Qwest ISP Server or modem bank and the geographic area from which calls rated as local are routed to that Server or modem bank.

RESPONSE:

No.

Respondent: Mary LaFave

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-002

REQUEST:

Does Qwest provide what it considers to be "VNXX" service in Washington? If so, please provide the following information:

- a. The name(s) of such service and the tariff, price list, or contract provisions governing that service;
- b. The geographic area(s) within which Qwest provides that service; and
- c. The physical location of Qwest's (or its customer's) ISP Server to which the calls are routed.

RESPONSE:

No.

Respondent: Larry Brotherson

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-003

REQUEST:

Does any Qwest affiliate provide dial-up Internet access service in Washington? If so, please provide the following information:

- a. The identity of the affiliate(s), the name(s) of such service, and the tariff, price list, or contract provisions governing that service; and
- b. The physical location of each Qwest affiliate ISP Server or modem bank and the geographic area from which calls rated as local are routed to that Server or modem bank.

RESPONSE:

- a. Qwest Enterprise America, Inc. offers retail, dial-up Internet access under the brand name "MSN Dial-Up Powered by Qwest." For further information, please refer to <http://pcat.qwest.com/pcat/productDetail.do?salesChannel=Residential&offerId=6627>

Qwest Communications Corporation offers ISPs a wholesale dial access product. For further information, please refer to: http://www.qwest.com/pcat/partners/product/1,1016,2097_6_12,00.html

- b. See response to PWT 01-012.

Respondent: Mary LaFave

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-004

REQUEST:

Does any Qwest affiliate provide what Qwest considers to be "VNXX" service in Washington? If so, please provide the following information:

- a. The identity of the affiliate(s), the name(s) of such service, and the tariff, price list, or contract provisions governing that service;
- b. The geographic area(s) within which the Qwest affiliate provides that service;
- c. The physical location of the Qwest affiliate's (or its customer's) ISP Server to which the calls are routed; and
- d. The contract or other arrangement under which Qwest and its affiliate exchange traffic.

RESPONSE:

No.

Respondent: Legal

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-005

REQUEST:

Does Qwest provide any service in which the customer has a telephone number assigned to a local calling area other than the local calling area in which the customer is physically located? If so, please provide the following information:

- a. The name(s) of each such service and the tariff, price list, or contract provisions governing each service;
- b. The physical location of each customer receiving any such service, the customer's telephone number(s), and the local calling area to which the telephone number(s) is/are assigned; and
- c. An explanation of how calls between the customers of those services and customers of other carriers are rated and routed, including but not limited to the compensation Qwest pays or receives from the other carriers.

RESPONSE:

Yes. Qwest offers Foreign Exchange (FX) service and Primary Rate Service (PRS-Integrated Services Digital Network) with FCO or FX in Washington.

(a) Please refer to the Washington Exchange and Network Services Tariff for the provisions for Foreign Exchange Service and Primary Rate Service with FCO or FX.

(b) Qwest objects to this request insofar as it seeks individual customer information (CPNI) regarding FX subscribers that is not relevant to the dispute in this case and is not reasonably calculated to lead to the discovery of admissible evidence. FX service is very different from VNXX and in addition comprises only a miniscule part of Qwest's subscriber base. This traffic is a recognized exception to the NPA-NXX geographic numbering conventions and Qwest believes that such traffic is de minimus.

(c) For FX service, the customer purchases an FX connection in the local calling area in which the customer seeks a local number. All calls to and from other customers in the same local calling area where the FX customer purchased a connection are treated as local. All calls to and from customers outside the local calling area where the FX customer's connection was purchased are treated as toll calls. The additional transport for carrying calls from the local calling area where the connection was purchased, to the FX customer's location, is ordered as a private line tariffed service. When a retail customer of another carrier in local calling area one (LCA 1) places a call to a FX customer's number in LCA 2, the call is routinely dialed with a "1" as the first digit and classified as usage-sensitive toll; and the appropriate inter-carrier charges associated with the call would apply.

With Primary Rate Service, the customer can receive dial tone from a switch that is not in the customer's local wire center. If the switch is in a wire center in the same exchange, the customer can order a Foreign Central Office. If the switch is in a wire center in a different exchange, the customer can order Foreign Exchange. Either way, the customer would pay **Intrastate** DS1 mileage between the wire centers. The transport mileage rate element would come from the state tariff, price list, catalog or ICB contract, whichever is applicable for the DS1 Service in the state. The customer will continue to pay

normal charges on the PRS (with the added cost of the DS1) **Intrastate** fixed and per mile rates for transport mileage.

Respondent: Larry Brotherson

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-006

REQUEST:

If Qwest charges rates for any of the services identified in response to Request No. 6 that are higher than the rates for comparable service provided to customers physically located within the local calling area with which their telephone numbers are associated, please identify the amount of that higher rate that Qwest provides to local exchange carriers who would otherwise be entitled to switched access charges for originating calls to, and terminating calls from, the Qwest customers located outside the local calling area.

RESPONSE:

Qwest charges the retail FX customer the same rates for FX service as other comparable retail services (i.e. local exchange rates and private line transport rates). Switched access charges are not applicable to the end user purchasing the FX Private Line Transport service. Please refer to Request No. 5 for an explanation of inter-carrier charges associated with calls between two different LCAs and local exchange carriers. Local calls between two local exchange carriers in Washington are exchanged at Bill and Keep. For "jointly provided" FX services between Qwest and three Independent Companies in Washington, Qwest meet point bills the Private Line Transport service (each company bills their own portion of the service). For all other jointly provided FX services with other carriers in Washington, Qwest is considered the "Designated Toll Provider". As the Designated Toll Provider, Qwest bills the end user customer for the service end-to-end as if all locations are in Qwest territory at Qwest's current tariff rates. The Independent Companies then submit a separate bill to Qwest for their portion of the jointly provisioned service at the ILEC's prevailing rates.

Respondent: Larry Brotherson

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-007

REQUEST:

Does Qwest exchange local traffic with any other incumbent local exchange carrier ("ILEC") in Washington? If so, (a) what customer location information do Qwest and the other ILEC(s) provide each other for purposes of rating and routing the traffic they exchange; and (b) how does Qwest compensate the other ILEC(s) for calls between the ILECs' customers in a local calling area and Qwest customers whose telephone numbers are associated with that local calling area but who are physically located in another local calling area?

RESPONSE:

Yes. (a) Qwest does not provide customer location information or call records to other ILECs for local calls in Washington. (b) Compensation for traffic exchanged with other ILECs within the local calling area is handled under a Bill and Keep arrangement. For inter-carrier compensation arrangements refer to PWT 01-006.

Respondent: Larry Brotherson

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-011

REQUEST:

How many ISP customers does Qwest serve in the state of Washington?

RESPONSE:

Qwest objects to this data request on the basis that the number of ISP customers it serves is not relevant in this case as Qwest is not seeking compensation for ISP-bound traffic. Without waiver of this objection, Qwest is unable to identify the number of end users it sells retail services to who operate as ISPs because they do not necessarily identify themselves as ISPs.

Respondent: Legal
Mary LaFave

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-012S1

REQUEST:

Is there an ISP Server or modem bank physically located within each local calling area in which Qwest provides local exchange service in Washington? If not, please identify the local calling areas in which there is no ISP Server or modem bank and explain how Qwest customers located in those local calling areas obtain dial-up access to ISPs.

RESPONSE:

Generally, ISPs purchase ISDN/PRS circuits out of the retail, intrastate tariff to offer their end users a dial-up Internet access service. Local numbers are assigned to each dedicated local ISDN/PRS circuits that are provisioned from each local calling area to the customer. Qwest knows the 2 end points of each such circuit, and knows that the customer has a physical presence, but does not know if there is a server or modem on the customer's side of the demarcation point. If they 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 the appropriate ISP.

Respondent: Mary LaFave

SUPPLEMENTAL RESPONSE dated 7/22/05:

Generally, ISPs purchase ISDN/PRS circuits out of the retail, intrastate tariff to offer their end users a dial-up Internet access service. Local numbers are assigned to each dedicated local ISDN/PRS circuits that are provisioned from each local calling area to the customer. Qwest knows the 2 end points of each such circuit, and knows that the customer has a physical presence, but does not know if there is a server or modem on the customer's side of the demarcation point. In addition, because Qwest adheres to the numbering guidelines and properly assigns numbers, Qwest knows that its ISP customers are either located in the same local calling area as their end users, or have a physical presence in that calling area by virtue of their private network. If they 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 the appropriate ISP.

Respondent: Mary LaFave

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-013

REQUEST:

Is there more than one ISP Server or modem bank physically located within each local calling area in which Qwest provides local exchange service in Washington not identified in response to Request No. 13? If not, please identify the local calling area in which there is no more than one ISP Server or modem bank and explain how Qwest customers located in each of these local calling areas could obtain dial-up access to an alternative ISP on competitive rates, terms, and conditions if they would be required to pay toll charges for access to that alternative ISP.

RESPONSE:

See response to PWT 01-012.

Respondent: Mary LaFave

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-016

REQUEST:

If a Pac-West customer in Seattle were to place a call to a Qwest customer who is physically located in Tacoma or Olympia, but who has a Seattle telephone number through a Market Expansion Line or similar arrangement, what intercarrier compensation mechanism should apply, in Qwest's view, and why? Would your answer be different if the Qwest customer is an ISP? If so, why?

RESPONSE:

Qwest's Market Expansion Line (MEL) is a remote call forwarding "feature" that allows a customer to call forward their service to a different location without requiring a physical location in that area. Calls to MELs are forwarded automatically from the central office ("CO") to another telephone number of the customer's choice. This is no different than any customer call forwarding their line to another location. Calls can be forwarded to either a local or long distance number. In the example provided, when a Pac-West customer in Seattle dials a Seattle telephone number, the call is handed off to Qwest in Seattle. The MEL customer utilizing the remote call forwarding feature of their service pays the applicable toll charges from the MEL CO to the terminating telephone, no different than any other customer that call forwards their telephone number to a different location. A call from the Pac-West customer in Seattle to a MEL customer with a Seattle number would be treated as a local call for intercarrier compensation purposes.

Functionally similar to MEL, but rather different from an architecture and compensation standpoint is Foreign Exchange ("FX") service. Unlike MEL, for a customer ordering FX service, the call is routed to the CO in which the called party number resides. That call is then routed over a dedicated facility to a distant CO, which then terminates the call to the customer who ordered the FX service. For this service, as with VNXX, the appropriate treatment of the call would be that this is an interexchange call for which no reciprocal compensation should apply.

Calls to an ISP would not be compensable under the ISP-Remand Order unless the ISP had a server or modem bank in the same local calling area as the calling party.

Respondent: Larry Brotherson

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-017

REQUEST:

Please identify each and every numbering requirement or guideline with which Qwest alleges that Pac-West is not in compliance as stated in paragraph 58 of Qwest's Answer. For each such requirement or guideline, please explain (a) why Pac-West's assignment of telephone numbers is inconsistent with that requirement or guideline; and (b) why Qwest's assignment of telephone numbers associated with a local calling area to customers who are not physically located in that local calling area is consistent with that requirement or guideline.

RESPONSE:

(a) Pac-West's misassignment of telephone numbers is not consistent with the telecommunications industry's numbering resource guidelines. For example, the Alliance for Telecommunications Industry Solutions (ATIS) Central Office Code (NXX) Assignment Guidelines (COCAG) (section 2.14) assumes "from a wireline perspective that CO [central office] codes/blocks allocated to a wireline service provider are to be utilized to provide service to a customer's premise physically located in the same rate center that the CO codes/blocks are assigned. Exceptions exist, for example tariffed services such as foreign exchange service." (Emphasis added.) VNXX is not identified as an exception. In addition, section 4.2.6 of the COCAG provides that "[t]he numbers assigned to the facilities identified must serve subscribers in the geographic area corresponding with the rate center requested." (Emphasis added.) Finally, "geographic NPAs" are the "NPAs which correspond to discrete geographic areas within the NANP [North American Numbering Plan]," while "non-geographic NPAs" are "NPAs that do not correspond to discrete geographic areas, but which are instead assigned for services with attributes, functionalities, or requirements that transcend specific geographic boundaries," "the common examples [of which] are NPAs in the N00 format, e.g., 800." COCAG, § 13.0.

(b) Qwest's assignment of telephone numbers associated with a local calling area to customers who are not physically located in that local calling area is consistent with the industry guidelines because such guidelines specifically recognize tariffed exceptions like foreign exchange service, but do not recognize VNXX. These guidelines are very recent, having been issued in June 2005. The absence of any reference to VNXX as an exception to the geographic assignment of numbers, at a time when the issue is being hotly debated in various forums, indicates to Qwest that the guidelines do not recognize VNXX as an exception in the same manner that FX services are recognized.

Respondent: Legal

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-018

REQUEST:

Please identify all complaints, formal disputes, or other measures that Qwest has taken to raise the issues identified in paragraph 58 of its Answer with the FCC, the North American Numbering Council, the numbering administrator, or any other body with jurisdiction or authority over NPA/NXX assignments.

RESPONSE:

Qwest objects to this data request on the grounds that it is overly broad. Without waiver of this objection, Qwest responds as follows: It is virtually impossible for Qwest to identify all "measures" that Qwest may have taken to raise the issues identified in paragraph 58 of the answer with respect to a CLEC's improper NPA/NXX assignments or use of VNXX. For example, Qwest is currently involved in a number of interconnection enforcement petitions or complaints and interconnection agreement arbitrations in various states with Level 3 in which these issues are being litigated. Further, Qwest and AT&T recently engaged in a series of interconnection agreement arbitrations in numerous states in which AT&T attempted to expand the definition of local exchange service to include VNXX schemes. Finally, Qwest was involved in a docket (Docket No. SPU-02-11, SPU-02-13), and submitted testimony, before the Iowa Utilities Board ("IUB"), in which the Board denied challenges to the North American Numbering Plan Administrator decision to deny Level 3 the use of numbering resources because Level 3 proposed to use the requested numbers to provide VNXX services. The IUB found that VNXX is not an authorized local service and the proposed use of telephone numbers would be inconsistent with applicable standards and guidelines. Certain aspects of the Board's order have been appealed, and the appeal is still pending.

Respondent: Legal

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-020

REQUEST:

Are Qwest's network and billing systems capable of routing and rating traffic based on the calling parties' physical locations, rather than their respective NPA/NXXs? If so, please describe how.

RESPONSE:

In the majority of cases Qwest rates calls based upon the geographic assignment of the calling and called party telephone numbers and the associated local rate center configuration. Qwest rates calls according to the dialed digits employing NPA-NXX, but not exclusively. For example, 8XX, N11 (411, 911), 0+ and 0-, 00, 101XXXX+ are routed and rated according to the standard designations of the public switched network. Another exception to this would be the rating of FX service, which constitutes less than 0.2% of Qwest's Washington access lines. Foreign Exchange (FX) service is a combination of rate elements from the Local Exchange tariffs and Private Line Transport tariffs and/or catalogs. The customer purchases an FX connection in the local calling area in which the customer seeks a local number. With FX service, the Qwest FX customer buys a local connection in the Local Calling Area ("LCA") it wants local access to at tariffed local exchange rates and bears the full financial responsibility, at tariffed rates, to transport the call back to the LCA where the call is answered.

Respondent: Daniel Collins, Staff Advocate

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-021

REQUEST:

Please describe how "VNXX" service is different than foreign exchange service from the point of view of the end user who is making a call to a customer of "VNXX" or foreign exchange service. For example please describe whether and how an end-user would know the difference between a call it places to a foreign exchange customer verses a call placed to a customer of "VNXX" service.

RESPONSE:

The end user is unaware of whether a call is a VNXX or FX call. However, the end-user's perception of the call is irrelevant to determining the appropriate intercarrier compensation mechanism. One example that illustrates this point is the requirement in Washington that carriers allow end-users to dial any 10-digit call as a 1+ call. Carriers are required to complete that call regardless of whether the call is a local call or a long distance call to which toll charges apply. For local calls completed in this manner, no toll charges are assessed. Intercarrier compensation in this case is based on the nature of the call as either local or long distance, based on the NPA/NXX of the calling and called parties, and their geographic locations. It is not based on the customer perception of whether the call might be a toll call because the subscriber dialed it using a 1+.

Respondent: Larry Brotherson

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-022

REQUEST:

Please identify each carrier to whom Qwest delivers what Qwest considers to be "VNXX" traffic over trunk groups other than local interconnection service ("LIS") trunks. For each such carrier, please identify the type of trunk group over which Qwest delivers that traffic and the date on which Qwest began to deliver "VNXX" traffic over that trunk group.

RESPONSE:

Qwest objects to this data request to the extent it requests carrier-specific information about other CLECs. Without waiver of this objection, Qwest states that it considers VNXX traffic to be traffic that is interexchange in nature that is inappropriately routed over LIS facilities (giving the appearance that long distance calls are local). As such, Qwest identifies inappropriately routed VNXX traffic over LIS facilities where the called and calling parties are in different local calling areas. If Pac-West were to properly assign numbers in accordance with exchange boundaries and geographic local calling areas, this "VNXX" would be properly identified as toll, and routed over trunk groups other than LIS, i.e. Feature Group D Switched Access trunks. Qwest would not need to identify the traffic as VNXX, as the traffic would be considered switched access traffic and accurately identified as toll. These calls would be subject to the access provisions that govern interexchange toll traffic.

Respondent: Larry Brotherson

QWEST CORPORATION

STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-023

REQUEST:

Please identify the dates on which Qwest (a) established Qwest's position that what Qwest considers to be "VNXX" traffic is not local or ISP-bound traffic subject to reciprocal compensation or the compensation mechanism in the FCC's ISP Remand Order; (b) first notified interconnecting carriers of Qwest's position; and (c) began withholding payment on bills from any interconnecting carrier for compensation for what Qwest considers to be VNXX traffic pursuant to Qwest's position and/or notification.

RESPONSE:

(a) Qwest has taken the position that VNXX calls to ISPs are not local and are not subject to Reciprocal Compensation as early as February 2003. Since the ISP Remand Order, Qwest has paid and continues to pay for calls to ISPs within the local calling area. When identified, however, Qwest excludes VNXX calls as non local calls.

(b) Qwest notified interconnecting carriers of Qwest's position on VNXX traffic on January 25, 2005.

(c) The first payment Qwest withheld for what Qwest considered to be VNXX traffic was associated with 2004 MOU in January 2005.

Respondent: Larry Brotherson

QWEST CORPORATION
STATE: Washington
DOCKET NO: Docket No. UT-053036
CASE DESCRIPTION: Pac-West Telecomm, Inc. v. Qwest Corporation
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-012

REQUEST:

Is there an ISP Server or modem bank physically located within each local calling area in which Qwest provides local exchange service in Washington? If not, please identify the local calling areas in which there is no ISP Server or modem bank and explain how Qwest customers located in those local calling areas obtain dial-up access to ISPs.

RESPONSE:

Generally, ISPs purchase ISDN/PRS circuits out of the retail, intrastate tariff to offer their end users a dial-up Internet access service. Local numbers are assigned to each dedicated local ISDN/PRS circuits that are provisioned from each local calling area to the customer. Qwest knows the 2 end points of each such circuit, and knows that the customer has a physical presence, but does not know if there is a server or modem on the customer's side of the demarcation point. If they 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 the appropriate ISP.

Respondent: Mary LaFave