



April 18, 2005

Mr. Dan Hult  
Qwest  
1314 Douglas-On-The-Mall, Room 1330  
Omaha, Nebraska 68102

**RE: VNXX on LIS Trunks**

Dear Dan

In response to Qwest's letter dated 1/27/05 and subsequent conference calls related to VNXX on LIS trunks, ELI herein responds to Qwest's position and actions. ELI strongly disagrees with Qwest's assertion which discriminates against ELI's ability to provide FX service.

Qwest's analysis fails on several levels. On a very basic level, it assumes that CLECs have built their networks to mirror the ILEC. As Qwest is aware this is not the case. ELI has strategically deployed switches that serve multiple rate centers, the location of which are irrelevant.

ELI bears the cost of transporting the calls from the rate center where the call originates to ELI's switch for delivery to its end users. Qwest does not incur any additional costs as a result of ELI's provision of FX service. In addition, the manner in which ELI hands calls to Qwest for termination to Qwest's FX'd end users is identical. These calls are handed to Qwest over LIS trunks to the EO where the npa-nxx resides. Qwest then transports the call to the end user in the distant location. Qwest has not demonstrated how the offerings by both parties differ.

Upon review of the interconnection agreement, ELI has determined Qwest's dispute is not supported contractually.

**Part C, Reciprocal Traffic Exchange, Trunking Requirements**

***2.2.8.7 The Parties agree to exchange Exchange Service (EAS/Local) traffic in the same EAS/Local area as such traffic originated.***

As noted above, ELI does pick up the call in the Local area where the traffic originated. EAS/Local traffic as defined below further supports the treatment of the call as local.

*Extended Area Service (EAS/Local Traffic) Exchange Service - means traffic that is originated by an end user of one Party and terminates to an end user of the other Party as defined in accordance with Qwest's then current EAS/local serving areas, as determined by the Commission.*

Furthermore, even if ELI were to agree with Qwest's position, it would appear that Qwest's methodology for determining this traffic and subsequent dispute is flawed. Upon review of a sample of the data provided by Qwest, ELI has determined for the Seattle region, more than 50% of the telephone numbers identified by Qwest, had been disconnected, some as early as 2000. Please reference attached spreadsheet.

**EXHIBIT C**

ELI requests immediate withdrawal of Qwest's dispute.

Sincerely,

Kim Czak  
Director - Carrier Services

cc: Dennis Robins  
Jenny Smith