

WUTC Docket No. UT-053036
Pac-West Responses to Qwest Data Requests
July 15, 2005

Data Request No. 2:

For each NPA-NXX identified in Data Request 01, identify the physical location of Pac-West's (or its customer's) ISP Server to which those calls are routed.

Response:

Pac-West objects to this request as vague and ambiguous in failing to define the term "physical location," which could be any number of places, particularly for business customers with offices or facilities in different areas, all of which can be reached using a single telephone number. Subject to, and without waiver of, this objection, Pac-West does not possess the information requested. Pac-West does not, in the normal course of business, determine what service is specifically provided for the purpose of ISP service. The FCC recognized the futility of attempting to identify the specific traffic that was destined for the Internet, and for that reason implemented a test to estimate (or "presume") what traffic would be deemed "ISP-bound." For the same reason, the information sought by this question is unavailable.

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Data Request No. 3:

For each NPA-NXX identified in Data Request 01, where the individual assigned telephone numbers are not assigned to an ISP Server, please identify the physical location of each customer served.

Response:

Pac-West objects to this request as vague and ambiguous in failing to define the term "physical location," which could be any number of places, particularly for business customers with offices or facilities in different areas, all of which can be reached using a single telephone number. Pac-West further objects to this request on the grounds that it is unduly burdensome in seeking information that Pac-West does not maintain in the form requested. Pac-West does not obtain, store or track which telephone number is assigned to ISP servers nor does Pac-West maintain geographic location as part of its customer records.

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Data Request No. 7:

For all the traffic that Qwest sends to Pac-West, please identify the amount of traffic each month since January 2005 that originates and terminates in different local calling areas but that is not rated as toll traffic due to VNXX numbering assignment. Exclude [sic] traffic that is sent by Pac-West [sic] to an ISP customer whose server is located in the same [sic] local calling area as where the call originated.

Response:

Pac-West objects to this request on the grounds that it is unduly burdensome. Subject to, and without waiver of that objection, according to standard industry practice, the V&H coordinates of the telephone number assigned to a customer establishes the "location" of that customer for purposes of rating calls to or from that customer. Pac-West does not track the "physical location" of its customers on any other basis for purposes of rating calls to or from its customers.

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Data Request No. 8:

How many ISP customers does PacWest serve in the state of Washington? How many physical connections to the PacWest switch does PacWest sell to ISPs?

Response:

Pac-West objects to this request on the grounds that it is unduly burdensome. Subject to, and without waiver of, that objection, Pac-West, like Qwest, serves customers that offer ISP services to the public, but Pac-West does not require its customers to “self-identify” as ISPs to obtain service from Pac-West. Further, Pac-West is unaware of any method to reliably identify which customers are using a particular Pac-West service to provide ISP service and therefore does not store or track such information.

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Data Request No. 9:

Where is the physical location of the PacWest switches that serves ISP customers receiving calls from Qwest Washington end users who dial the telephone number of the ISP connected to the PacWest switch?

Response:

Pac-West does not track which of its customers are ISPs or are using Pac-West service to provide ISP service, but Pac-West provides its services in Washington from a central office in Tukwila. The location of Pac-West's switch is identified in the industry-standard Local Exchange Routing Guide ("LERG").

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