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May 18, 2007

Via Electronic Mail and Overnight Courier

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
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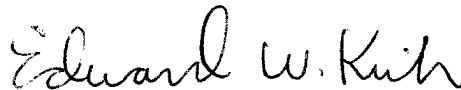
Boston
Hartford
London
Los Angeles
New York
Orange County
San Francisco
Silicon Valley
Tokyo
Walnut Creek
Washington

**Re: Docket UT-063038; Qwest Corporation v. Level 3
Communications, et al. – Broadwing Communications, LLC's
Second Response to Bench Request 2**

Dear Madam Executive Secretary:

Enclosed please find an original and three copies of Broadwing Communications, LLC's Second Response to Bench Request 2 (BR-2). A copy of this filing was also provided by electronic mail.

Respectfully submitted,



Edward W. Kirsch
Counsel to Broadwing Communications, LLC

Enclosures

cc: The Honorable Judge Mace
Attached service list

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

QWEST CORPORATION

Complainant,

v.

LEVEL 3 COMMUNICATIONS, LLC;
TCG-SEATTLE; ELECTRIC
LIGHTWAVE, LLC; ADVANCED
TELCOM GROUP, INC. D/B/A
ESCHELON TELECOM, INCL.; .;
BROADWING COMMUNICATIONS,
LLC; GLOBAL CROSSING LOCAL
SERVICES INC; AND, MCIMETRO
ACCESS TRANSMISSION SERVICES
LLC D/B/A VERIZON ACCESS
TRANSMISSION SERVICES,

Respondents.

Docket No. UT-063038

BROADWING COMMUNICATIONS,
LLC'S SECOND RESPONSE TO BENCH
REQUEST 2 (BR-2)

On May 3rd, Broadwing filed its Response to Bench Request 2. Sometime thereafter, counsel for WITA left a voice mail message for counsel for Broadwing stating that WITA did not believe that Broadwing answered the correct question posed in Bench Request 2. Broadwing counsel then tried to contact WITA's counsel, Mr. Finnigan, and left him a voice message advising him that Broadwing had answered what it believed to be the correct question posed in Bench Request 2 and further offered to voluntarily amend BR-2 if the transcript showed otherwise.

Upon receiving its copy of the transcript, apparently rather than resolving the different interpretations of the Bench Request jointly or seeking the input of the Judge jointly, WITA instead chose to immediately file a Motion to Compel.

Now that Broadwing has had an opportunity to review the transcript and conduct some additional internal research into the matter, it files its revised response to Bench Request 2 below.

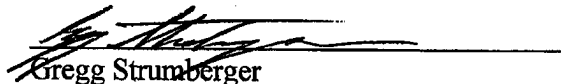
Bench Request: Whether or not the WECA Universal Service Fund access rate element assessed by Focal, now Broadwing, to interexchange companies when it originates or terminates intrastate access minutes have been remitted to WECA.

Response: Broadwing's parent, Level 3, began investigating this matter immediately following the hearing. Level 3 has experienced difficulties gathering Focal, now Broadwing data due to systems changes and personnel turnover specific to this request,

and has not yet completed its investigation. However, to date, Level 3 has not located evidence that the "WECA rate element" charges collected by Focal, now Broadwing, have been remitted to the Washington Exchange Carrier Association. In submitting this response, Level 3 expressly reserves its rights to present contrary evidence and to object to the lawfulness of or precise requirements to remit said charges to WECA at a later date.

DATED this 18th day of May, 2007.

LEVEL 3 COMMUNICATIONS, LLC



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Counsel for Level 3 Communications, LLC

CERTIFICATE OF SERVICE

I, Edward W. Kirsch, hereby certify that on the 18th day of May, 2007, true and correct copies of **Broadwing Communications LCC's Second Response to Bench Request 2 (BR-2)** were served on all parties of record in this proceeding listed below via electronic mail and overnight delivery. In addition, the original plus three (3) copies were submitted to the Executive Secretary of the Commission and a courtesy copy was provided to the Honorable Judge Mace.

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Edward W. Kirsch, Esq.

Dated this 18th day of May, 2007