

**WUTC Docket No. UT-053081**  
**NTI Response to Qwest First Data Requests**  
**January 12, 2006; Supp. January 25, 2006**

**Data Request No. 13:**

For each month in 2005, please quantify the amount of traffic that NTI customers received that is telecommunications traffic, separate from information services traffic. Provide all facts and data that support your answer.

**Response:**

NTI objects to this request on the grounds that it seeks information that is already in the possession of Qwest. Qwest measures all traffic its customers originate to NTI customers and thus already possesses the requested data. Subject to, and without waiver of, that objection, NTI will provide its measurements of the amount of traffic that NTI customers received for each month in 2005 by January 20, 2006.

**Supplemental Response:**

See Confidential Attachment.

Prepared by: Counsel (objection); Andrew Metcalfe  
Date: January 12, 2006; January 25, 2006

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