

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

**Data Request No. 13:**

Please state whether there is any difference in prices in Pac-West price lists for ISPs to obtain service in the same local calling area as the Pac-West switch versus any other local calling area. If so, please specifically identify the pages and sections of the price list that show the pricing differential.

**Response:**

Pac-West objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiver of, that objection, Pac-West's Washington price list is available on Pac-West's website.

Prepared by: Counsel (objections) and Ethan Sprague  
Telephone: 209-926-3416  
Date: July 15, 2005

**WUTC Docket No. UT-053036**  
**Pac-West Supp. Response to Qwest Data Requests**  
**July 25, 2005**

**Data Request No. 14:**

Please identify the price list or contract provisions under which Pac-West provides VNXX service to its ISP customers.

**Response:**

Pac-West objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiver of, that objection, see Response to Data Request No. 13.

Prepared by: Counsel (objections) and Ethan Sprague  
Telephone: 209-926-3416  
Date: July 15, 2005

**Supplemental Response:**

Pac-West has products or services in Washington that may incorporate foreign exchange ("FX") features or services, i.e., Type 3 and potentially PSTN On-Ramp. Pac-West, however, does not have any stand-alone FX products or services. Additionally, since the FX features are currently built into other products and services, Pac-West does not have a specific rate or charge for FX in Washington.

Prepared by: Josh Thieriot