

DOCKET NO.: UT-063038  
CASE DESCRIPTION: Formal complaint of Qwest Corporation against Level 3 Communications, LLC, Pac-West Telecomm, Inc., Northwest Telephone, Inc., TCG-Seattle, Electric Lightwave, Inc., Advanced Telcom, Inc., d/b/a Advanced Telcom Group, Inc., (aka Advanced Telcom Group, Inc., d/b/a Eschelon Telecom, Inc.), Focal Communications Corporation (no longer registered in Washington), Global Crossing Local Services, Inc., and MCI Communications Services, Inc., d/b/a Verizon Business Services (fka MCI WorldCom Communications, Inc.), for an order prohibiting VNXX.  
REQUEST NO.: BCH 01-001

**BENCH REQUEST NO. 1:**

To Qwest and Verizon Access:

In the transcript, at pages 984 to 986, Mr. Finnegan requested that both Qwest and Verizon Access provide him with the number of VNXX voice minutes they exchange with each other. The parties did not follow up on that request and I believe the Commission would find the information useful. Please provide that number for each of the last three years, distinguishing between VNXX voice minutes and VNXX minutes for ISP-bound traffic.

**RESPONSE:**

Verizon Access and Qwest have conferred and provide the following joint response. The “Initial Percent Compensable Minute Factor” or “Initial PCMF” in the interconnection agreement amendment (see section 3.2 of Attachment 1), which creates the ratio applicable to determine compensable minutes under the amendment, was a figure negotiated by the two parties based on each party’s review of its own general Washington traffic data. In negotiating the Initial PCMF, including the “quantity of Virtual NXX Traffic” in the denominator of the ratio, neither party had any data on the amount of VNXX voice minutes exchanged between the parties, but both believed the amount of such minutes, if any existed, to be de minimis. Thus, as the Initial PCMF was a negotiated figure and in light of each party’s belief that if there are any VNXX voice minutes exchanged, the amount of those minutes is de minimis, the parties do not have any data responsive to this request. Please note that under the amendment, either party may request revisions to the Initial PCMF after an initial one-year period based on actual data regarding traffic pattern or network configuration. Upon such request, the parties are to negotiate a revised PCMF and amend the agreement accordingly (see section 3.3 of Attachment 1).