

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

QWEST CORPORATION,	)	
	)	DOCKET UT-063038
Complainant,	)	
	)	GLOBAL CROSSING AND PAC-
v.	)	WEST ANSWER TO WITA
	)	PETITION FOR ADMINISTRATIVE
LEVEL 3 COMMUNICATIONS, LLC,	)	REVIEW
<i>et al.</i> ,	)	
	)	
Respondents.	)	
.....	)	

Pursuant to WAC 480-07-825, Global Crossing Local Services, Inc. (“Global Crossing”), and Pac-West Telecomm, Inc. (“Pac-West”) submit this Answer to the Petition for Administrative Review of Order 02 Initial Order (“Initial Order”) filed by the Washington Independent Telephone Association (“WITA”). Global Crossing and Pac-West oppose, and recommend that the Commission deny, the WITA Petition.

**DISCUSSION**

**A. WITA Lacks Standing or a Sufficient Basis for Seeking Review of the Initial Order.**

1. Qwest Corporation (“Qwest”) initiated this proceeding by filing a complaint against Global Crossing, Pac-West, and several other competitive local exchange carriers (“CLECs”), alleging that “VNXX” provisioned foreign exchange (“FX”) service is unlawful. WITA did not file its own complaint but simply intervened in this docket. The sole issue in this proceeding, therefore, is whether CLECs may lawfully provide “VNXX” provisioned FX service within Qwest’s service territory in Washington. The

Initial Order resolves this issue in favor of the CLECs. The Initial Order also raises and addresses other issues, of which Pac-West has sought administrative review, but none of those issues are specific to WITA or its members. Indeed, WITA introduced no evidence and the record is otherwise devoid of any evidence that CLECs are providing “VNXX” provisioned FX service outside of the Qwest local exchange areas or that any such provisioning, if it exists, has any impact whatsoever on WITA.

2. Qwest is not a member of WITA, and Qwest has not sought administrative review of the Initial Order. WITA, therefore, has no basis on which it can seek such review. Accordingly, the Commission should reject WITA’s petition in its entirety for lack of standing and/or any basis on which WITA can independently seek review of an Initial Order addressing issues specific to the named parties.

**B. The Initial Order Correctly Concludes that “VNXX” Provisioned FX Service Is Not Unlawful or Subject to Access Charges.**

3. Even if WITA could independently seek review of the Initial Order, WITA has failed to identify any basis on which the Commission should alter the provisions of the order that WITA challenges. The Initial Order concludes that “Qwest has not met its burden to show that VNXX service per se is illegal.”<sup>1</sup> WITA does not directly dispute that conclusion but claims instead that the Initial Order errs by finding that such service is exempt from access charges. In WITA’s view, “The fact is that these VNXX calls have the characteristics of interexchange, non-local calls which are subject to access charges.”<sup>2</sup> WITA fails to substantiate its claims.

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<sup>1</sup> Initial Order ¶ 55.

<sup>2</sup> WITA Petition ¶ 10.

4. WITA does not even address the portions of the Initial Order that analyze and reject the various theories on which Qwest contended that “VNXX” provisioned FX service is unlawful.<sup>3</sup> Accordingly, WITA provides no basis for the Commission to review, much less reverse, the Initial Order’s conclusion that this service is not unlawful.

5. Instead, WITA focuses on the portion of the Initial Order after the order states that “[h]aving found that VNXX service per se is not illegal, the Commission must also determine whether there are public interest concerns that mandate either outright prohibitions or some form of limitation.”<sup>4</sup> As Pac-West maintains in its Petition for Administrative Review of the Initial Order, Commission consideration of such issues is procedurally improper and inappropriate.<sup>5</sup> WITA, however, misconstrues the Initial Order’s public policy discussion on cost recovery as the rationale underlying the decision that access charges do not apply to “VNXX” provisioned FX services, *i.e.*, that such service is not illegal. Cost recovery played no part in the Initial Order’s conclusion on the legality of “VNXX” provisioned FX service, and WITA’s contention to the contrary is unwarranted.

6. WITA also mischaracterizes the Initial Order’s description of “VNXX” provisioned FX service. The Initial Order found that such service has *characteristics of both* “local” and long distance calling.<sup>6</sup> Such a finding is equally true of the FX and FX-like services provided by Qwest and other incumbent local exchange carriers (“ILECs”),

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<sup>3</sup> Initial Order ¶¶ 28-55.

<sup>4</sup> Initial Order ¶ 56.

<sup>5</sup> Pac-West Petition for Administrative Review of Order 02 Initial Order ¶¶ 4-9.

<sup>6</sup> *E.g.*, Initial Order ¶ 55.

yet no party contends that the long distance characteristics of those ILEC services subjects them to access charges.<sup>7</sup>

7. Indeed, whether a service has “characteristics” of “long distance” service is not the inquiry required under federal law to determine the appropriate form of intercarrier compensation. The federal Telecommunications Act of 1996 (“Act”) imposes the duty on all local exchange carriers (“LECs”) to “establish reciprocal compensation arrangements for the transport and termination of telecommunications.”<sup>8</sup> The Act, however, provided an exception to that requirement for “exchange access, information access, and exchange services for such access [provided] to interexchange carriers and information service providers,” which LECs are obligated to provide under the same compensation obligations that existed immediately prior to passage of the Act until those obligations are explicitly superseded by the FCC.<sup>9</sup> The Act thus establishes two types of telecommunications traffic: (1) Section 251(g) traffic – exchange or information access, *e.g.*, switched access provided to interexchange carriers (“IXCs”), which is subject to access charges; and (2) Section 251(b)(5) traffic, or all other forms of telecommunications traffic, which are subject to reciprocal compensation.<sup>10</sup> WITA fails to recognize this applicable legal framework, much less demonstrate that within that framework “VNXX” provisioned FX traffic is not Section 251(b)(5) traffic.

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<sup>7</sup> See, *e.g.*, Ex. 501T (Pac-West Sumpter Response) at 3-10; Joint CLEC Opening Brief ¶¶ 26-39; Joint CLEC Reply Brief ¶¶ 21-30.

<sup>8</sup> 47 U.S.C. § 251(b)(5).

<sup>9</sup> *Id.* § 251(g).

<sup>10</sup> The FCC established ISP-bound traffic as a third traffic type, although the FCC has yet to provide a judicially acceptable legal basis for doing so, and prescribed a reduced level of compensation for such traffic. *In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, 16 F.C.C. Rcd 9151, 2001 WL 455869 (Apr. 27, 2001) (“ISP Remand Order”).

8. WITA's simplistic argument that, having found that "VNXX" provisioned FX service has characteristics of long distance service, the Initial Order erred in failing to impose access charges misconstrues the Initial Order's findings and rationale and ignores the record evidence and applicable law. The Commission should give no credence to such arguments.

**C. No Record Evidence Demonstrates that Any Party Is Using "VNXX" Traffic or Any Other Measures to Bypass Access Charges.**

9. WITA's most egregious unfounded accusation is that "what the evidence in the record shows is that VNXX services are being used to bypass access charges."<sup>11</sup> More specifically, WITA accuses Global Crossing and Pac-West of "routing all of their traffic through VNXX mechanisms and other routing mechanisms that constitute a complete avoidance of access charges" and claims that "Ms. Peters, on behalf of Global Crossing, describes how access traffic is delivered on a commingled basis with local traffic over local trunks. Such routing is a clear access bypass mechanism,"<sup>12</sup> as well as "the source of what is known as Phantom Traffic."<sup>13</sup> WITA's claims are unsupported and patently false.

10. There is no evidence whatsoever that Global Crossing, Pac-West, or any other CLEC routes all of their traffic so as to completely avoid payment of access charges. None. WITA, as has been its custom in this docket, makes factual assertions in its Petition that are beyond the scope of this proceeding and that have no support in the record. There is no record evidence on how CLECs route all of their traffic; no record

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<sup>11</sup> WITA Petition ¶ 11.

<sup>12</sup> WITA Petition ¶ 12.

<sup>13</sup> WITA Petition ¶ 14.

evidence on what “Phantom Traffic” is or how it is created; no record evidence on how switched access is recorded and billed when traffic is routed over a common trunk group. Indeed, Ms. Peters testified that she did not know the technical details of whether and how access charges are recorded and billed in the Seattle LATA where Global Crossing maintains its single point of interconnection in Washington.<sup>14</sup> This absence of evidence is not surprising given that these issues have nothing to do with Qwest’s complaint or “VNXX” provisioned FX service. WITA thus has no evidentiary support for its self-serving and irrelevant claims that Global Crossing and Pac-West are engaging in access bypass simply because they route “local” and intraLATA toll or switched access traffic on the same interconnection trunk group.

11. The Commission, however, would not need to look far to discover that such traffic routing is standard industry practice and fully authorized under interconnection agreements. For example, Qwest’s Statement of Generally Available Terms (“SGAT”), which the Commission approved in Docket Nos. UT-003022 and UT-003040, provides in section 7.2.2.9.3.2:

***Exchange Service (EAS/Local) traffic and Switched Access traffic including Jointly Provided Switched Access traffic, may be combined on the same trunk group.*** If combined, the originating Carrier shall provide to the terminating Carrier, each quarter, Percent Local Use (PLU) factor(s) that can be verified with individual call record detail. Call detail or direct jurisdictionalization using Calling Party Number information may be exchanged in lieu of PLU if it is available. (Emphasis added.)

Routing “local” and switched access traffic on the same trunk group thus is not an “access bypass mechanism” but is a means of efficiently using network facilities to

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<sup>14</sup> TR. at 681, lines 1-13 (Global Crossing Peters).

exchange multiple types of traffic. As the SGAT language plainly states, the carriers account for switched access traffic either based on a calculation of the percentage of overall traffic that is attributable to toll calls or by using call record detail – *i.e.*, the telephone numbers of the calling and called parties – just as Ms. Peters explained.<sup>15</sup> And as Ms. Peters also testified, Global Crossing honors bills for switched access charges for toll traffic that is routed over such common interconnection trunk groups.<sup>16</sup>

12. Because WITA members face virtually no local exchange competition and refuse to negotiate interconnection agreements with CLECs, WITA may not be aware of how competing local exchange carriers exchange “local” and toll traffic. WITA’s ignorance, however, does not excuse, much less justify, WITA’s spurious and irresponsible accusations. The record is devoid of any evidence that Global Crossing, Pac-West, or any other CLEC is engaging in access bypass, whether through providing “VNXX” service or by any other means.

**D. “VNXX” Provisioned FX Service Is Not Access Bypass.**

13. Global Crossing and Pac-West extensively explained that “VNXX” provisioned FX service is functionally indistinguishable from ILEC FX and FX-like services and is no more “access bypass” than those comparable ILEC services.<sup>17</sup> WITA, like Qwest, claims that “VNXX” provisioned FX is more comparable to toll bridging, which the Commission has found to be unlawful. The Initial Order, however, correctly rejected this argument, concluding that “toll bridging and VNXX are technologically different” and

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<sup>15</sup> *Id.* at 676, lines 5-15.

<sup>16</sup> *Id.* at 676, lines 16-20.

<sup>17</sup> *See, e.g.*, Ex. 501T (Pac-West Sumpter Response) at 3-10; Joint CLEC Opening Brief ¶¶ 26-39; Joint CLEC Reply Brief ¶¶ 21-30.

that the Commission's "toll bridging cases cannot be relied upon to prohibit VNXX."<sup>18</sup> WITA simply ignores these findings, which completely undermine WITA's claims.

14. WITA nevertheless contends that "VNXX has the same effect as toll bridging" and that the "overarching principle" in the Commission's toll bridging decisions "was that avoidance of toll and access charges should not be permitted simply because technological or legal loopholes might allow such avoidance"<sup>19</sup> WITA's statement is no more true of "VNXX" provisioned FX service than it is of Qwest FX or FX-like services. In both cases, customers choose to have a "presence" in a local calling area other than the one in which they are physically located. These customers obtain telephone numbers that are rated to that local calling area so that they can place and receive "local" calls from other customers with telephone numbers rated to that *same* local calling area. Toll bridging permitted a customer with a telephone number rated in one local calling area to call a customer with a telephone number rated to a *different* local calling area without paying toll charges. As the Initial Order finds, FX service is not toll bridging.

15. WITA, of course, does not attempt to address this distinction. Indeed, WITA fails even to acknowledge that Qwest offers a Market Expansion Line ("MEL") service that could be used to bridge extended area service ("EAS") areas. Using WITA's toll bridging example,<sup>20</sup> Qwest could provide a MEL customer who is physically located in Auburn with a Renton telephone number to which customers in Bellevue could place calls that would be forwarded to the MEL customer in Auburn, without a toll charge and without Qwest incurring or imputing access charges. If Qwest's MEL service does not

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<sup>18</sup> Initial Order ¶ 50.

<sup>19</sup> WITA Petition ¶ 19.

<sup>20</sup> See WITA Petition ¶ 20.



run afoul of the Commission's toll bridging decisions, "VNXX" provisioned FX service certainly does not. The Initial Order properly rejected WITA's claims to the contrary.

**E. "VNXX" Provisioned FX Service Is Not Comparable to "IP-in-the-Middle" Services.**

16. "VNXX" provisioned FX service is a competitive response to the FX and FX-like services provided by the ILECs that, when provided to ISPs, enables customers to achieve greater network efficiencies and lower costs that can be passed on to their subscribers.<sup>21</sup> WITA disparages this service as "a form of regulatory arbitrage, bypassing access charges, to provide an interexchange service," which "is no different in practical effect than LocalDial's IP-in-the-middle scheme."<sup>22</sup> WITA's claims do not withstand even cursory scrutiny.

17. The "IP-in-the-middle" services provided by LocalDial and AT&T provided calling between telephone numbers that were rated to different local calling areas – calls that historically have been treated as toll calls subject to switched access charges. LocalDial and AT&T, however, claimed that they were providing an information service that was exempt from access charges because although the calls originated and terminated on the public switched telephone network ("PSTN"), a portion of the call was carried over the Internet. Both the Commission and the FCC disagreed, concluding that these carriers were actually providing a telecommunications service that was indistinguishable from traditional toll service and was subject to access charges.<sup>23</sup>

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<sup>21</sup> *E.g.*, Ex. 501T (Pac-West Sumpter Response) at 3-10.

<sup>22</sup> WITA Petition ¶¶ 27-28.

<sup>23</sup> *WECA v. LocalDial*, Docket No. UT-031472, Order No. 08 (June 11, 2004).

18. “VNXX” provisioned FX service bears no resemblance to these “IP-in-the-middle” services. With “VNXX” provisioned FX service, like ILEC FX and FX-like services, both the calling and called parties are “located” in the same local calling area through the assignment of telephone numbers rated to that local calling area. Unlike “IP-in-the-middle” service, CLECs do not claim that FX service, regardless of how provisioned, is not a telecommunications service. Such calling, moreover, has never been considered toll traffic in Washington and has never been subject to access charges. FX and FX-like service, whether provided by a CLEC or an ILEC, is a local exchange service. WITA’s attempt to tar “VNXX” provisioned FX service with the brush of LocalDial and AT&T is without merit.

**F. “VNXX” Provisioning of FX Service to ISPs Has No Effect on Access Revenues.**

19. The Initial Order correctly found that “VNXX” provisioning of FX service to ISPs has never been subject to access charges and that ISP dial up service did not exist when the access charge system was established.<sup>24</sup> WITA contends that the latter conclusion is not correct because after ISP dial-up was well established, the Commission revised how it calculated the amount of subsidy that rural carriers would receive from the surcharge that all LECs must include in their intrastate originating and terminating access charges. WITA misses the point. When and how the Commission changed the application of the rural ILEC subsidy surcharge on access charges is irrelevant because ISP dial up traffic is not, and never has been, subject to access charges and thus does not make, and never has made, any contribution whatsoever to the subsidy pool from which

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<sup>24</sup> Initial Order ¶ 72.

the rural carriers draw. ISP dial-up traffic, whether provisioned via “VNXX” FX or not, has no effect on any carrier’s access revenues.

20. WITA nevertheless contends that rural carriers lose originating access revenue if their customers call a “VNXX” telephone number instead of making a toll call and lose revenue from the rural ILEC subsidy surcharge if other carriers do not impose access charges on such calls that their customers make and receive. There is no evidence in the record that customers of WITA members place *any* calls to CLEC customers, much less to CLEC customers who subscribe to “VNXX” provisioned FX service, so once again, WITA’s factual allegation lacks any record support. No party, moreover, disputes that customers would not pay toll charges to access the Internet, so even if access charges were applied to “VNXX” provisioned FX service provided to ISPs, there would be no additional access revenues because that service would no longer exist. WITA has no basis for its claims of access revenue loss from ISP dial-up traffic.

**G. Customers Rely on ISP Dial-Up Services Provided Through “VNXX” Provisioned FX Service.**

21. The Initial Order understates the case by stating that “prohibiting VNXX service for ISP-bound calls might have an adverse impact on current customers of dial-up internet access.”<sup>25</sup> Qwest would never have brought its complaint if its customers were not making extensive use of ISP dial-up services to ISPs who obtain “VNXX” provisioned FX service from CLECs. Indeed, Qwest’s witness testified that Qwest may not provide any service to ISPs because they have migrated to CLECs providing “VNXX” provisioned FX service.<sup>26</sup> At the very least, the record evidence supports the

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<sup>25</sup> Initial Order ¶ 83.

<sup>26</sup> TR. at 301 (Qwest Brotherson).

reasonable conclusion that prohibition of “VNXX” provisioned FX service would severely disrupt current ISP dial-up service and would substantially increase the cost of dial-up Internet access to the ultimate detriment of consumers. The Commission thus has more than sufficient record evidence to conclude that customers would be adversely impacted if “VNXX” provisioned FX service were not available. WITA’s assertions to the contrary are simply incorrect.

22. WITA, however, repeats its argument that “[w]hat VNXX service actually accomplishes is to consolidate the ISP market by artificially lowering the expense of operation to large, national and regional ISPs” and thus damages “smaller local ISPs.”<sup>27</sup> The Initial Order correctly rejected this argument, charitably observing that “WITA provided no evidence that would support its contention that there are ‘mom and pop’ rural ISP providers who would jump at the chance to offer dial-up service.”<sup>28</sup> WITA produced no evidence at all. WITA thus cannot support its claims.

**H. “VNXX” Provisioned FX Service Does Not Violate Washington Statutes.**

23. Global Crossing and Pac-West have already extensively addressed the issue of Qwest’ allegations that “VNXX” provisioned FX service violates Washington statutes and have demonstrated that such allegations are groundless.<sup>29</sup> Global Crossing and Pac-West will not repeat that discussion in response to WITA’s much more spare repetition of those claims except to observe that “VNXX” provisioned FX service is no less fair, just, and reasonable, and no more unduly prejudicial or disadvantageous to ILECs, than ILEC

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<sup>27</sup> WITA Petition ¶ 38.

<sup>28</sup> Initial Order ¶ 78.

<sup>29</sup> Joint CLEC Opening Brief ¶¶ 13-16; Joint CLEC Reply Brief ¶¶ 7-10.

provisioned FX and FX-like services. The idea that CLECs could subject ILECs to undue prejudice and disadvantage at all, much less by providing services that directly compete with ILEC services, is nothing short of laughable.

**I. “VNXX” Provisioned FX Service Is the Functional Equivalent of ILEC FX and FX-Like Services.**

24. The Commission has found in previous cases, and the record in this case amply demonstrates, that “VNXX” provisioned FX service is functionally equivalent to FX and FX-like services provided by Qwest. WITA repeats Qwest’s arguments to the contrary to no avail. Again, Global Crossing and Pac-West have previously addressed this issue,<sup>30</sup> and they will not repeat that discussion here except to observe that WITA, like Qwest, focuses on the differences in how each type of service is provided to *retail* customers. Such distinctions are irrelevant. What is relevant is that both CLECs and ILECs must pay to transport calls that their customers originate to the point of interconnection (“POI”) with the terminating carrier. When the terminating carrier’s customer subscribes to FX or FX-like service, that carrier is responsible for transporting the call from the POI to the customer, but how the terminating carrier does so is immaterial to the carrier’s relationship with the originating carrier. Whether the terminating carrier is an ILEC providing FX or FX-like service or a CLEC providing “VNXX” provisioned FX service, if the telephone numbers of the calling and called parties are rated to the same local calling area, the originating carrier compensates the terminating carrier.

25. WITA characterizes such compensation as a “subsidy” but only when the CLEC is the terminating carrier. Qwest, however, is not “subsidizing” the CLEC’s provisioning of “VNXX” provisioned FX service any more than a CLEC is “subsidizing” Qwest when

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<sup>30</sup> See, e.g., Joint CLEC Opening Brief ¶¶ 26-39; Joint CLEC Reply Brief ¶¶ 21-30.

the CLEC compensates Qwest for calls CLEC customers make to Qwest subscribers of FX, MEL, One Flex, or any other FX-like service. There is no subsidy. In both cases, the terminating carrier is simply recovering its switching costs incurred to terminate traffic originated by the other carrier.

26. WITA also mischaracterizes the Initial Order as asserting “that because the extent of the subsidy is unknown, it need not be considered,” which WITA contends is “backwards” because “[i]f there is subsidy, the proponent of the subsidy should justify the deviation from the standard compensation mechanism of access charges.”<sup>31</sup> The Initial Order actually provides,

In addition, while it would not be good public policy to allow current local or toll customers to subsidize dial-up ISP service, the Commission cannot determine on this record what *if any* cross-subsidization is actually taking place. There is no information on the record about how much the local exchange service customer may be contributing, through local rates, to support dial-up ISP service, even though Qwest claims VNXX ISP-bound calling creates an unrecovered cost for Qwest.<sup>32</sup>

The Initial Order thus correctly finds that there is no evidence of *any* subsidy from Qwest customers to CLEC customers, making WITA’s argument moot.

**J. The Initial Order Correctly Refused to Prohibit “VNXX” Provisioned FX Service for Voice Traffic.**

27. The Initial Order properly states that “the Commission is persuaded that allowing VNXX traffic for all purposes is the best possible course from a public policy standpoint. Allowing VNXX traffic for all purposes allows CLECs to be fully competitive with ILEC

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<sup>31</sup> WITA Petition ¶ 48 (emphasis in original).

<sup>32</sup> Initial Order ¶ 71 (emphasis added).

FX services and should provide benefits to Washington consumers in the form of more service options and lower prices.”<sup>33</sup> The record fully supports that conclusion.

28. WITA disagrees, claiming that there is no evidence in the record to support the Initial Order’s “speculat[ion] that there would be no effect on the access charge mechanism.”<sup>34</sup> The burden of proof was on Qwest, as the complainant, to prove that “VNXX” provisioned FX service provided to voice customers has any more impact on the access charge regime than Qwest’s own FX and FX-like services, and Qwest failed to carry that burden. The Initial Order correctly states that “there is little evidence on the record in this case that significant VNXX voice calling will occur in the near term.”<sup>35</sup> Qwest produced no evidence of the extent to which its own FX services avoid access charges, which Global Crossing and Pac-West demonstrated could be just as (or more) substantial as “VNXX” provisioned FX service.<sup>36</sup> There is simply no basis on the record in this case to conclude that “VNXX” provisioned FX service has any different effect on the access charge system than any other form of FX or FX-like service.

29. WITA was not entitled to make its own claims in this Qwest complaint case, but the Initial Order nevertheless stated, “With respect to WITA’s concerns that severe erosion of access and universal service revenues would occur if voice VNXX traffic is permitted, WITA supplied no witness or evidence of its own to support its claims.”<sup>37</sup> WITA does not even attempt to contradict that finding. The Commission, therefore, should also reject WITA’s claims.

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<sup>33</sup> Initial Order ¶ 104.

<sup>34</sup> WITA Petition ¶ 51.

<sup>35</sup> Initial Order ¶ 105.

<sup>36</sup> Joint CLEC Opening Brief ¶ 48 (and record citations therein).

<sup>37</sup> Initial Order ¶ 105.

**CONCLUSION**

30. For the foregoing reasons, the Commission should deny WITA's Petition.

DATED this 14th day of November, 2007.

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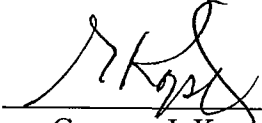
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CERTIFICATE OF SERVICE  
UT-063038

I certify that I have this day served the attached *GLOBAL CROSSING AND PAC-WEST ANSWER TO WITA PETITION FOR ADMINISTRATIVE REVIEW* upon all parties of record in this proceeding by sending a copy by electronic mail and U.S. Mail, unless otherwise specified, to the following parties or attorneys of parties:

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I also certify that on this day the attached original and 7 copies of **GLOBAL CROSSING AND PAC-WEST ANSWER TO WITA PETITION FOR ADMINISTRATIVE REVIEW** was served via e-mail and messenger delivery to the following:

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Dated this 14<sup>th</sup> day of November, 2007.

By: Mary Scarsorie  
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