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## PAC-WEST RESPONSE TO QWEST'S FIRST SET OF DATA REQUESTS

Response Date: May 24, 2012

Docket No.:

UT-053036

Requestor:

Respondent's

Respondent:

Pac-West

Prepared by:

Debbie Tutt

RESPONDENT'S DATA REQUEST NO. 11: Please provide any traffic studies Pac-West has with regard to the traffic in Question 10 above showing the nature of that traffic as either VNXX or local traffic, with an explanation of all assumptions used in the studies.

## PAC-WEST RESPONSE TO RESPONDENT'S DATA REQUEST NO. 11:

Pac-West is attempting to assemble the requested data and expects to supplement this response as soon as the responsive information is available.

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ATER WYNNE LLP Lawyers 601 Union Street, Suite 1501 Seattle, Washington 98101 (206) 623-4711

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# PAC-WEST SUPPLEMENTAL RESPONSE TO QWEST'S FIRST SET OF DATA REQUESTS

Supplemental Response Date: June 29, 2012

Docket No.:

UT-053036

Requestor:

Respondent's

Respondent:

Pac-West

Prepared by:

**Debbie Tutt** 

Phil Wroblewski (Supplemental Response)

**RESPONDENT'S DATA REQUEST NO. 11:** Please provide any traffic studies Pac-West has with regard to the traffic in Question 10 above showing the nature of that traffic as either VNXX or local traffic, with an explanation of all assumptions used in the studies.

### PAC-WEST RESPONSE TO RESPONDENT'S DATA REQUEST NO. 11:

Pac-West is attempting to assemble the requested data and expects to supplement this response as soon as the responsive information is available.

#### PAC-WEST SUPPLEMENTAL RESPONSE TO RESPONDENT'S DATA REQUEST NO. 11:

Pac-West continues to analyze call detail records. Pac-West expects that traffic studies for the previous 12-18 months will be complete in the next 2-3 weeks. Pac-West is continuing to receive data from tape archives for prior years. Pac-West will provide traffic studies as the data becomes available, but it is unclear at the point as to when such traffic studies for the prior years will be complete.

PAC-WEST SUPPLEMENTAL RESPONSES TO QWEST CORPORATION'S FIRST SET OF DATA REQUESTS Page 7

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