Sprint

UTAH PUBLIC
SERVICE COMMISSION

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RECEIVED

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Via Electronic Mail and US Mail

March 30, 2009

James Farr
Staff Advocate
Qwest Corporation
250 Bell Plaza, Room 1603
Salt Lake City, Utah 84111
(801) 237-7769

Re: Utah Docket No. 8-2430-01 (Qwest Proposed Tariff Revisions)

Dear Mr. Farr:

On behalf of Sprint Communications Company L.P. ("Sprint"), I am writing in response to your email dated March 23, 2009, for Qwest Corporation ("Qwest"). An attachment to that email included Qwest's proposed tariff revisions. You asked Sprint to review the revisions and get back to the parties on whether Sprint's issues were resolved.

Qwest's proposed additional language in 2.3.10.B.2.c states,"...unless the parties agree on a more accurate methodology" This additional language addresses Sprint's primary concern. Assuming this language will be ultimately approved and anticipating no objection to the language, Sprint expects that its involvement will be limited to monitoring the proceeding. Sprint reserves its right to fully participate in this proceeding if issues develop that are important to Sprint or if issues arise regarding the quoted language.

Please contact me with any questions regarding this response to the inquiry in your March 23, 2009 email.

Sincerely,

Bret Lawson

Cc. Parties of Record

Enclosure

PARTIES OF RECORD

Julie P. Orchard
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2. GENERAL REGULATIONS

2.3 OBLIGATIONS OF THE CUSTOMER (Cont'd)

2.3.9 COORDINATION WITH RESPECT TO NETWORK CONTINGENCIES

The customer shall, in cooperation with the Company, coordinate in planning the actions to be taken to maintain maximum network capability following natural or man-made disasters which affect telecommunications services.

2.3.10 JURISDICTIONAL REPORT REQUIREMENTS

A. Jurisdictional Determinant

Pursuant to Federal Communications Commission order F.C.C. 85-145 adopted April 16, 1985, interstate usage is to be developed as though every call that enters a customer network at a point within the same state as that in which the called station (as designated by the called station number) is situated is an intrastate communication and every call for which the point of entry is in a state other than that where the called station (as designated by the called station number) is situated is an interstate communication.

To determine the jurisdiction of a call, the Company compares the originating number information with the terminating number information. Traffic without sufficient call detail shall be that traffic for which the originating number information lacks a valid Charge Party Number (ChPN) or Calling Party Number (CPN). (N)

For purposes of CCSAC ISUP Call Set-up requests, Percent Other Messages (POM) shall be established by dividing the customer CCSAC ISUP Call Set-up requests (originating and terminating) associated with local, EAS, intraMTA, the Local Exchange Company portion of jointly provided Switched Access and Company originated toll by the total number of CCSAC ISUP Call Set-up requests (originating and terminating) and expressing the result as a percentage in a whole number.

When mixed interstate and intrastate Access Service is provided on the same Access Service transmission path, all charges between interstate and intrastate are prorated as set forth in 2.3.11, following. (N)

A floor of 5% will be set for a switched access customer's Feature Group D terminating access minutes when they are lacking originating number information needed to determine jurisdiction. The 5% floor will be applied as follows:

- When the percentage of terminating traffic without sufficient call detail to determine jurisdiction does not exceed the 5% floor, the Company will apply the PIU factor as set forth in B.2.c, following or (N)
- When the percentage of terminating traffic without sufficient call detail to determine jurisdiction exceeds the 5% floor, the Company will assess rates from the state jurisdiction on all minutes exceeding the 5% floor. (M)

(M) Material moved to Page 13.1.

2. GENERAL REGULATIONS

2.3 OBLIGATIONS OF THE CUSTOMER
2.3.10 JURISDICTIONAL REPORT REQUIREMENTS

B.2. (Cont'd)

c. Terminating FGD Service

When a customer orders terminating FGD, if the Company has sufficient call details to determine the jurisdiction for the call, the Company will bill the call minutes of use according to that jurisdiction, **unless the parties agree on a more accurate methodology**. (C) (C)

When terminating call details are insufficient to determine the jurisdiction for the call, see A, preceding, the customer may supply the projected PIU factor for a portion of the indeterminate jurisdiction by LATA[1]. The projected PIU factor will be used to apportion the terminating traffic which does not exceed the 5% floor. (T) (C) | (C)

When terminating call details are insufficient to determine the jurisdiction, and the customer does not supply a projected PIU factor by LATA, calls will be billed using a PIU of 50 (50% interstate – 50% intrastate). The PIU of 50 will be used to apportion the terminating traffic which does not exceed the 5% floor. (C) (C)

In the event that the Company applies the intrastate terminating access rate to calls without sufficient call detail as provided in this tariff, the customer will have the opportunity to request backup documentation regarding the Company's basis for such application, and further request that the Company change the application of the intrastate access rate upon a showing of why the intrastate rate should not be applied. (See also Section 2.4.1.B.4, billing disputes.) (N) | (N)

[1] When the customer reports a LATA-level PIU factor, the specified percentage applies to all end offices within the LATA.