

Bruce S. Asay
Associated Legal Group, LLC
1807 Capitol Avenue, Suite 203
Cheyenne, WY 82001
(307) 632-2888

Stephen F. Mecham
Callister, Nebeker & McCulloch
10 E. South Temple, Suite 900
Salt Lake City, UT 84133-1101
Telephone: (801) 530-7316

Attorneys for Union Telephone Company

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH**

IN THE MATTER OF THE PETITION OF
QWEST CORPORATION FOR ARBITRATION) Docket No. 04-049-145
OF AN INTERCONNECTION AGREEMENT)
WITH UNION TELEPHONE COMPANY D/B/A)
UNION CELLULAR UNDER SECTION 252
OF THE FEDERAL TELECOMMUNICATIONS)
ACT OF 1996)

NOTICE OF DEPOSITION DUCES TECUM

PLEASE TAKE NOTICE that the Complainant, Union Telephone Company, by and through its undersigned counsel, Bruce S. Asay, Associated Legal Group, LLC, will, pursuant to Rule 746, Utah Administrative Code and to Rule 30(b)(6) Utah Rules of Civil Procedure, take the deposition of Qwest Corporation. The company is advised to designate a representative that can address, as required by Rule 30(b)(6), U.R.C.P., issues involving: Qwest's knowledge of "phantom traffic", whether Qwest strips calls from the traffic stream, whether Qwest stripped information from the message referenced in Qwest Data Request 3-001 from Emory Telephone Company and whether Qwest's switches have the capability to strip call information. Qwest is to produce the designated witness with the referenced documents at the time and place indicated below:

NAME

Qwest Corporation

PLACE

Offices of Qwest Corporation
California Street Suite 1000

Denver, CO 80202

July 18,2006 180 1
8:30 A.M.

The Deponent is instructed to bring the following documents to the Deposition and should be sufficiently knowledgeable or versed such that the Witness can testify as to the documents:

Any record showing message traffic that has had call information stripped from it.

Qwest's billing records for one month for all carriers connecting calls to Union Telephone including wireless and IXC traffic.

Qwest's billing records for one month for traffic that Qwest delivers to Union (Union's Wyoming LRNs) in which the traffic is that is unidentified (*i.e.* no carrier identifying information).

The technical material or standards for Qwest's switches that demonstrate its capacity to read message traffic or to strip identifying information from a message

Any complaint from other carriers against Qwest or its Predecessor in Interest alleging that Qwest stripped call information from messages or participated in or allowed "phantom traffic".

Any document filed with regulatory agencies showing Qwest's position on phantom traffic or on the stripping of information from message traffic.

This deposition will be taken for all purposes allowed under the Utah Rules of Civil

Procedure. You are invited to attend and cross-examine. The deposition will be taken from day to day, as necessary until completed and adjourned.

DATED this **29th** day of June ,2006.

Bruce S. &say

Associated Legal Group, LLC 1807 Capitol Avenue, Suite 203
Cheyenne, Wyoming 82009 (307) 632-2888 *Attorney for Union
Telephone Company*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he provided a copy of the foregoing Notice of
Deposition to the following named parties by electronic mail on the **29th** day of
June, 2006, and addressed as follows:

Melissa Thompson
Thomas Dethlefs
Corporate Counsel
Qwest Service Corporation
1801 California Street, Suite 1000
Denver, CO 80202
MelissaThompson@qwest.com
TomDethlefs@qwest .com

Michael Ginsberg
Patricia Schmid
Counsel for Division of Public Utilities
P.O. Box 140857
Salt Lake City, UT 84114-0857
mginsberg@utah.gov