

ATTACHMENT A
TO VERIZON'S SUPPLEMENTAL REPLY
TO QWEST'S MOTION TO COMPEL

Utah Docket No. 08-2430-01

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

Docket No. 08S-550T

**RE: THE INVESTIGATION AND SUSPENSION OF TARIFF SHEETS FILED BY
QWEST CORPORATION WITH ADVICE LETTER NO. 3081**

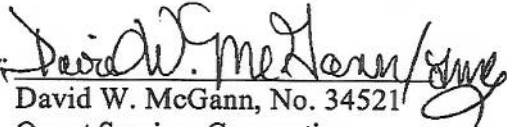
**QWEST CORPORATION'S RESPONSES TO MCI COMMUNICATIONS SERVICES,
INC. D/B/A VERIZON BUSINESS SERVICES' (VERIZON BUSINESS) FIRST SET OF
DATA REQUESTS**

Qwest Corporation ("Qwest"), by and through its undersigned counsel, submits its attached
RESPONSES TO VERIZON BUSINESS SERVICES' FIRST SET OF DATA REQUESTS,
Request Nos. 001, 002, 003, 004, 005, 006, 007, 008, 009, 010, 011 and 012, in the above-
referenced case.

Dated this 5th day of June, 2009.

Qwest Corporation

By:


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Colorado
Docket No. 08S-550T
Verizon 01-001

INTERVENOR: MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon")

REQUEST NO: 001

All references in this data request are to the Rebuttal Testimony of Philip Linse, dated May 11, 2009.

- a. On page 2, line, 17, Mr. Linse refers to "comparable Qwest data."
- b. On page 12, line 5, Mr. Linse refers to "the sample AMA data Qwest has reviewed."
- c. On page 13, line 15, Mr. Linse refers to "Qwest's AMA data sample results of Verizon's terminating Feature Group D Access traffic."
- d. On page 13, line 17, Mr. Linse refers to "the Qwest samples I examined."
- e. On page 18, lines 2-3, the question refers to "Qwest's sample data."
- f. On page 18, lines 10-11, Mr. Linse refers to "Qwest's samples of Verizon's Feature Group D Access traffic."
- g. On page 18, line 12, Mr. Linse refers to "Qwest's own data."
- h. On p. 18, line 16, Mr. Linse refers to "the Qwest sample data."
- i. On p. 19, lines 12-14, Mr. Linse refers to "the sample of Qwest records that Qwest has analyzed."

Provide all of the data, samples, sample data, and data sample results referenced in Mr. Linse's testimony that is identified in paragraphs (a) through (i) above.

RESPONSE:

Qwest does not maintain "all of the data" in a manner that can be readily provided to Verizon. Qwest is evaluating options that would allow Qwest to provide the data requested and will provide such data if and when Qwest finds a viable option. However Qwest's study relied upon record counts based upon specific criterion. As is clear with the attached Confidential Attachment "A" results, the total potential volume of international traffic is well within Qwest's propose tariff change and it is Qwest's expectation that Verizon's self reported PIU does now and would continue to include international traffic.

Respondent: Philip Linse

Colorado
Docket No. 08S-550T
Verizon 01-002

INTERVENOR: MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon")

REQUEST NO: 002

On page 2, lines 16-17, of his rebuttal testimony, Mr. Linse states that "[m]any of Mr. Merrick's arguments are supported by information that is not reasonably verifiable or cannot be verified through an examination of comparable Qwest data."

- a. Did Mr. Linse attempt to verify the information provided by Mr. Merrick?
- b. If the answer to (a) is yes, describe his examination and explain what "comparable Qwest data" he examined.
- c. Provide all documents and records produced as part of that examination.
- d. Provide the "comparable Qwest data" to which Mr. Linse refers.

RESPONSE:

a. Although Qwest has not attempted to obtain and verify in detail all of Verizon's data summarized in confidential exhibit PHM-2 (excluding settlement discussions) due to the voluminous data involved, Qwest has requested data from Verizon for the purposes of validating the information summarized in confidential exhibit PHM-2. However, Verizon has not been cooperative in providing such information. The voluminous data associated with Verizon's confidential exhibit PHM-2 becomes apparent when assuming conservatively that Verizon would have routed at least one million answered calls to Qwest each day of the three month study period that was referenced in confidential exhibit PHM-2. This would result in over 90 million individual records that would need to be provided in order to verify in detail all of Verizon's data. Qwest is not aware nor does Qwest employ the use of a universal application that could accommodate 90 million records for analysis. However, Qwest has attempted to validate information provided by Mr. Merrick based upon Qwest's own data as provided in the answer to Verizon's data request above. Qwest's data is based upon Qwest's AMA switch recordings where Verizon's data is based upon its own non-AMA recordings. Again, the resistance of Verizon to provide Qwest with data in response to its data requests has prohibited Qwest from confirming Verizon's alleged claims within confidential exhibit PHM-2.

- b. See Qwest's response to Verizon Set 1, Data Request No. 2a.

c. See Qwest's response and Confidential Attachment "A" to Verizon Set 1, Data Request No. 1.

d. See Qwest's response and Confidential Attachment "A" to Verizon Set 1, Data Request No. 1.

Respondent: Philip Linse