

Qwest

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**Alex M. Duarte**

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June 18, 2009

Utah Public Service Commission
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Re: Docket 08-2476-02 - Qwest letter re May 21, 2009 Order

Dear Commissioners:

Qwest Corporation ("Qwest") has recently become aware that on May 21, 2009, the Commission issued its Report and Order Resolving Interconnection Dispute in *In the Matter of the Petition of Bresnan Broadband of Utah, LLC, to Resolve Dispute Over Interconnection of Essential Facilities and for Arbitration to Resolve Issues Relating to an Interconnection Agreement with UBTAUBET Communications, Inc.*, Docket No. 08-2476-02 (the "Order").

In the Order, the Commission permitted, but did not require, Bresnan Broadband of Utah, LLC ("Bresnan") to interconnect indirectly with UBTA-UBET Communications, Inc. ("UBTA") at the Qwest Provo Tandem Switch. The Order assumes, evidently based upon information that Bresnan provided during the proceeding, that it is presently possible for Qwest to provide and bill for a transit function involving calls that are local in UBTA's service territory, but are not local in Qwest's service territory. In fact, however, this assumption is not correct.

Qwest does not presently offer local transit service outside of its service territory. Accordingly, Qwest's network and billing systems do not presently have the capability to process and bill for local transit service for traffic that both originates and terminates in local calling areas outside of Qwest's service territory.

For Qwest to be able to provide a local transit service involving traffic that both originates and terminates in local calling areas outside of Qwest's service territory would require significant and costly modifications to Qwest's systems, even though the local calling area involved would be a fairly small geographic area. At a minimum, Qwest would need to make modifications to several systems that feed information into Qwest's Integrated Access Billing System (IABS) system. Among the systems that Qwest would need to change would be Qwest's PreProcessor (PP42) and Trunk Usage Measurement Setup (TUMS) systems.

The modifications that Qwest would need to make directly in the IABS system would include updates of tables for local calling areas which Qwest presently obtains from regulatory filings only for Qwest local calling areas. These tables are not currently loaded with NPA/NXX combinations for service territories of other Incumbent Local Exchange Carriers (“ILECs”), such as UBTA. In addition, Qwest does not presently have a way to keep track of NPA/NXX changes and updates to local calling areas that are not within Qwest’s service territory.

The changes to Qwest systems described above would be very expensive and would likely take a significant amount of time to implement. Qwest assumes that neither Bresnan nor UBTA would be willing to compensate Qwest for the costs to develop the billing capability in order to provide for interconnection for the exchange of UBTA/Bresnan local traffic at the Qwest Provo Tandem. Nevertheless, Bresnan and UBTA can establish a tariffed private line connection between their networks for the direct exchange of local traffic between Bresnan and UBTA. Alternatively, UBTA and Bresnan could utilize interexchange carriers or otherwise establish Feature Group D trunking with Qwest for the routing of traffic in the Vernal local calling area, if Bresnan and/or UBTA make such a request to Qwest, according to the terms of Qwest’s switched access tariffs. Absent Bresnan or UBTA being willing to compensate Qwest for the development of the billing capability to provide for interconnection for the exchange of traffic between rate centers not located within Qwest’s service territory at the Qwest Provo Tandem, these are the only alternatives that Qwest can provide.

If the Commission has any questions about this letter, or the subject of this letter, please feel free to contact me.

Very truly yours,

Alex M. Duarte
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Attorney for Qwest Corporation