



Federal Communications Commission
Washington, D.C. 20554

January 5, 2007

DOCKET FILE COPY ORIGINAL

Via Facsimile and First Class Mail

Mr. Craig J. Brown
Qwest Communications International, Inc.
Suite 950
607 14th Street, N.W.
Washington, D.C. 20005

Re: Petition of Qwest Communications International Inc. for Forbearance from Enforcement of the Commission's Dominant Carrier Rules As They Apply After Section 272 Sunsets (WC Docket No. 05-333)

Dear Mr. Brown:

On November 22, 2005, Qwest Communications International Inc., on behalf of its affiliates Qwest Communications Corporation, Qwest LD Corporation, and Qwest Corporation, (collectively, Qwest) filed a petition for forbearance pursuant to section 10 of the Communications Act of 1934, as amended (the Act),¹ requesting that the Commission forbear from applying its dominant carrier rules to Qwest's provision, on an integrated basis, of in-region, interstate, interLATA interexchange services after section 272 of the Act sunsets in Qwest's region.² In order for the Commission to evaluate whether the petition meets the forbearance criteria in section 10 of the Act, we require additional information and clarification of certain matters discussed in the petition.

Accordingly, pursuant to sections 4(i), 4(j), and 10 of the Act, we request that you provide written responses and supporting documentation for each request set forth in the attached Information Request. In order to expedite consideration of your petition, please file a complete response to the Request by January 16, 2007.

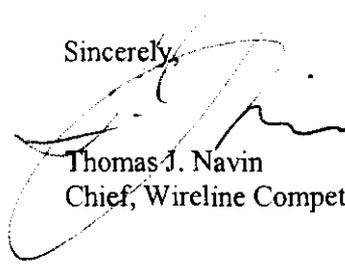
Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, under reference number WC Docket No. 05-333. The Wireline Competition Bureau also should receive, at a minimum, two copies of all filings.

¹ 47 U.S.C. § 160. On November 30, 2005, Qwest filed a corrected version of this petition. See *Petition of Qwest Communications International Inc. for Forbearance from Enforcement of the Commission's Dominant Carrier Rules as They Apply after Section 272 Sunset Pursuant to 47 U.S.C. § 160* (filed Nov. 30, 2005).

² 47 U.S.C. § 272; 47 U.S.C. § 160; see also *Pleading Cycle Established for Comments on Qwest's Petition for Forbearance from Enforcement of the Commission's Dominant Carrier Rules as they Apply After Section 272 Sunsets*, WC Docket No. 05-333, Public Notice, DA 05-3162 (rel. Dec. 8, 2005).

If you have any questions regarding this matter, please contact William Kehoe or Pamela Megna, Wireline Competition Bureau, at (202) 418-7122 or (202) 418-0482, respectively.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Navin", written over a faint circular stamp or watermark.

Thomas J. Navin
Chief, Wireline Competition Bureau

Attachment

**ATTACHMENT
INFORMATION AND DOCUMENT REQUEST**

I. Definitions

1. The term "Qwest" means Qwest Communications International Inc. and its subsidiaries.
2. The term "documentation" means written or graphic materials in Qwest's possession, custody, or control. "Documentation" includes hardcopy and electronic copies of correspondence, spreadsheet and database analyses, data, analyses, reports, memoranda, and presentations created, revised, prepared for, or distributed within the company or companies identified in the particular specification.
3. The term "franchise area" means all geographic areas within a state in which Qwest provides local exchange service pursuant to franchise or other authority granted by a relevant government or government agency and in which Qwest is the incumbent local exchange carrier as that term is used in the Telecommunications Act of 1996.
4. The term "local exchange service" means telephone exchange service or exchange access, whether offered with or without vertical features.
5. The phrase "over-the-top VoIP" means voice over Internet protocol (VoIP) service that requires the end user to obtain last mile broadband transmission from a third party.
6. The term "revenues" means billed amounts for goods or services without any allowance for uncollectibles, commissions, or settlements. Revenues should not include settlement receipts for terminating foreign traffic billed by foreign carriers. Revenues should not include any amounts corresponding to taxes levied on a company's customers by any governmental body but do not include any pass-through charges that a company levies on customers to recover taxes, regulatory fees, or other assessments placed on a company.
7. The term "specification" means a particular numbered request for documentation or other information specified in section III below.
8. The term "wholesale customers" means carrier customers, resellers, and Internet access service providers.

II. Instructions

1. Data or spreadsheets should be submitted in Microsoft Excel format. Each spreadsheet should contain or be accompanied by instructions and documentation sufficient to describe the spreadsheet's purpose, organization, and contents.

2. Unless otherwise indicated, each request for data is limited to data from December 31, 2003 through December 31, 2006. Data shall be provided on a quarterly basis. See specifications 1, 2, and 4.
3. State the source or sources of all data provided in response to specifications 1, 2, 4, and 5.
4. Explain the methodology used to develop each estimate provided in response to specifications 1, 2, 4, and 5.
5. Provide all documentation, including data, supporting each estimate provided in response to specifications 1, 2, 4, and 5.

III. Information Request Regarding Material Contained in Application

1. For each Qwest franchise area, provide:
 - a. The number of Qwest's retail residential wireline local exchange service lines and:
 - i) The number of these lines for which Qwest is the presubscribed interstate long distance carrier. Provide the number of these lines that are presubscribed to: (1) a Qwest usage per minute plan; (2) a Qwest plan that includes a bucket of interexchange minutes; and (3) a Qwest plan that includes an unlimited number of interexchange minutes. For each plan, provide the number of lines, the number of interLATA long distance minutes, the average number of minutes used, and the standard deviation of minutes used.
 - ii) The number of these lines for which each of AT&T (or SBC), Verizon (or MCI), Sprint, BellSouth, or another long distance carrier is the presubscribed interstate long distance carrier.
 - iii) The number of these lines for which there is no presubscribed interstate long distance carrier.
 - b. The number of residential lines Qwest provides to resellers, and the name and corresponding line counts for the top three purchasers of resold lines.
 - c. The number of residential UNE-L lines provided by Qwest, and the name and corresponding line counts for the top three purchasers of UNE-L lines.
 - d. The number of residential Qwest Platform Plus (QPP) lines or similar arrangements provided by Qwest, and the name and corresponding line counts for the top three purchasers of these lines.
 - e. The number of Qwest's retail residential DSL lines and the proportion of these customers for which Qwest does not also provide wireline local exchange service.

- f. By carrier, the number of residential access lines provided by facilities-based providers other than Qwest (*e.g.*, E-911 listings in which Qwest is not the underlying local exchange carrier).
 - g. An estimate of the total number of residential consumers relying upon over-the-top VoIP for all of their voice telecommunications needs, by provider.
 - h. An estimate of the total number of residential consumers that subscribe to mobile wireless service instead of wireline local exchange service and long distance service.
 - i. An estimate of:
 - i) Qwest's market share of presubscribed long distance services provided to residential customers, Qwest's market share of a local and long distance service bundles, and an estimate of the elasticity of demand for Qwest's long distance services.
 - ii) The churn rate for consumers switching among Qwest plans, and the churn rate for consumers switching to non-Qwest long distance services.
 - j. The number of Qwest's residential mobile wireless subscribers.
 - i) Provide an estimate of Qwest's share of residential mobile wireless lines.
 - ii) Provide an estimate of the proportion of Qwest's residential mobile wireless subscribers that subscribe to Qwest's mobile wireless service instead of a wireline local exchange service and long distance service.
2. For each Qwest franchise area, provide the number of retail residential wireline lines for which Qwest is the presubscribed interstate long distance carrier but not the local exchange carrier.
 3. Define each retail and wholesale business customer class to which Qwest sells domestic and international interLATA telecommunications services. List and define each domestic and international interLATA telecommunications service (*e.g.*, long distance voice, long haul traffic, private line, ATM, Frame Relay) that Qwest sells to each of these customer classes.
 4. For each Qwest franchise area, provide for each business customer class and each service class identified in specification 4:
 - a. Revenues, an estimate of Qwest's market share of revenues (or some other generally accepted unit of measurement), and an estimate of the elasticity of demand.

- b. An estimate of the market share of revenues (or some other generally accepted unit of measurement) for each of Qwest's competitors for each business customer class and service in that franchise area. For example, Qwest could provide the market share analysis compiled by a third party such as Harte Hanks, for interLATA services (e.g., long distance voice, T1 services, ATM and Frame Relay) for each Qwest franchise area, and to the extent possible, for each MSA within each Qwest franchise area.
5. In a December 7, 2006 *ex parte* letter, Qwest provides two tables containing nationwide and regional market share estimates based upon proprietary data that Qwest obtained from TNS Telecoms. Table 1 provides estimates for "InterLATA Service Revenues for Enterprise Customers." Table 2 provides estimates for "InterLATA Service Revenues for Small Business Customers."
- a. For each of these tables,
- i) Provide the sample size for: (1) the nationwide estimates; (2) the regional estimates; and (3) each Qwest in-region state.
 - ii) List and define each interLATA service for which data are included in the table.
 - iii) List and define each interLATA service that Qwest provides these customers, for which data are not included in the table.
 - iv) State whether the regional estimates include data only for Qwest's franchise areas or for the entire state.
- b. If the estimates in Tables 1 and 2 are based on a TNS Telecoms report, provide a copy of that report and the underlying data.
- c. If the estimates in Tables 1 and 2 are not based on a TNS Telecoms report, provide an explanation of the methodology used to develop each estimate, and all documentation, including data, used to arrive at each estimate.