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Melissa E. Newman  
Vice President – Federal Regulatory  
Qwest Communications International Inc.

607 14<sup>th</sup> Street NW  
Suite 950  
Washington, DC 20005  
202.429.3120



REDACTED – FOR PUBLIC INSPECTION

*Via Courier*

EX PARTE

May 20, 2008

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

FILED/ACCEPTED  
MAY 20 2008  
Federal Communications Commission  
Office of the Secretary

Re: *In the Matter of Petition of Qwest Corporation for Forbearance  
Pursuant to 47 U.S.C. § 160(c) in the Seattle Metropolitan  
Statistical Area, WC Docket No. 07-97*

Dear Ms. Dortch:

Qwest Corporation hereby submits the attached *ex parte* and request for confidential treatment (pursuant to the Second Protective Order) of certain highly confidential information included in the associated *ex parte*, in the above-captioned proceeding.

One original copy of the non-redacted version is being submitted; and two original copies of the redacted version are being submitted. For both the redacted and non-redacted versions, an extra copy is provided to be stamped and returned to the courier. Both the redacted and non-redacted versions of the *ex parte* are being served on Staff of the Commission's Wireline Competition Bureau as indicated below. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please contact me using the information reflected in the above letterhead.

Sincerely,

/s/ Melissa E. Newman

Attachments

Ms. Marlene H. Dortch  
May 20, 2008

Page 2 of 2

cc: (via e-mail)

Denise Coca ([denise.coca@fcc.gov](mailto:denise.coca@fcc.gov))

Jeremy Miller ([Jeremy.miller@fcc.gov](mailto:Jeremy.miller@fcc.gov))

Tim Stelzig ([tim.stelzig@fcc.gov](mailto:tim.stelzig@fcc.gov))

Gary Remondino (two hard copies of the non-redacted version & via  
[gary.remondino@fcc.gov](mailto:gary.remondino@fcc.gov))

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**Qwest**  
1801 California Street, 10<sup>th</sup> Floor  
Denver, Colorado 80202  
Phone 303-383-6653  
Facsimile 303-896-1107

**Daphne E. Butler**  
Corporate Counsel

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*Via Courier*

*EX PARTE*

May 20, 2008

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance  
Pursuant to 47 U.S.C. § 160(c) in the Seattle Metropolitan  
Statistical Area, WC Docket No. 07-97*

Dear Ms. Dortch:

Qwest Corporation (“Qwest”) hereby requests highly confidential treatment of certain information included in the associated attachment. The highly confidential information includes the numbers of Qwest residential and business subscribers to Voice over Internet Protocol (“VoIP”) service, as well as the number of VoIP business seats for the state of Washington.

The highly confidential information is submitted pursuant to the June 1, 2007 Second Protective Order (22 FCC Rcd 10134, DA 07-2293) in WC Docket No. 07-97. As required by the Second Protective Order, the highly confidential information (that is, the non-redacted version) is marked **HIGHLY CONFIDENTIAL – SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 07-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**. Pursuant to the Second Protective Order, Qwest requests that the non-redacted version of the *ex parte* (containing highly confidential information) be withheld from public inspection.

Qwest considers the highly confidential information as being extremely competitively-sensitive in nature. This type of information is “not routinely available for public inspection” pursuant to both Federal Communications Commission (“Commission”) rules 47 C.F.R. §§ 0.457(d) and 0.459 (as Qwest explained and for which it provided legal justification in its Request for Confidential Treatment and Confidentiality Justification submitted with its four Petitions for Forbearance (including the one for the Seattle, Washington MSA) on April 27, 2007.

Ms. Marlene H. Dortch  
May 20, 2008

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Qwest is simultaneously submitting, under separate covers, the non-redacted and redacted versions of this *ex parte*. The redacted version of the *ex parte* is marked "**REDACTED - FOR PUBLIC INSPECTION**". Both the redacted and non-redacted versions of the *ex parte* are the same except that in the non-confidential version the highly confidential information in the attachment has been omitted. This letter does not contain any confidential information.

If you have any questions concerning this submission, please call me on 303-383-6653.

Sincerely,

/s/ Daphne E. Butler

Attachment

**REDACTED – FOR PUBLIC INSPECTION**

**Seattle MSA  
Attachment 8**

Request 8: On May 9, 2008, the FCC Staff asked Qwest to provide in-service retail VoIP quantities to assess the extent to which Qwest’s sales of VoIP service may be contributing to the decline in Qwest’s retail access line base.

Response: In the confidential table below, Qwest provides quantification of Qwest VoIP services for Washington for the period of December 2007 (the most recent data vintage of retail and wholesale quantities Qwest has filed in this docket). Since Qwest’s tracking systems do not track VoIP services on a wire center basis, unlike its systems for traditional local exchange services, the data is provided on a statewide basis. However, even on a statewide basis, the in-service quantities shown are quite small and are higher than the counts would be at the MSA level (a subset of the state). Further, the counts shown below reflect actual retail subscribers and exclude any VoIP services provided to Qwest employees on a trial basis and VoIP services provided to Qwest company business locations.

Since Qwest’s VoIP service is an application-based service provide via a broadband Internet connection, it is not the equivalent of an “access line,” but rather can be tracked using terms such as “subscribers” and “seats.” A “seat” is essentially a telephone number, not an access line, available for use with the VoIP service, and in the case of a business subscriber, the customer may have numerous “seats” associated with the VoIP service. For residential subscribers, the service typically has only one “seat.” Also, consumer VoIP subscribers may purchase “virtual” telephone numbers capable of receiving only inbound calls (i.e., a Seattle customer may purchase an Olympia “virtual” number so that his/her relatives in Olympia can call him/her as a “local” call). The residential VoIP counts below exclude such data and only include customers that are using VoIP “seats” for both inbound and outbound local calling (which is equivalent to the manner in which a local exchange switched access line functions). Business VoIP customers purchasing either Qwest’s hosted or integrated access VoIP services purchase blocks of VoIP “seats” and can activate those seats as needed. Qwest does not track whether the business seats are active or inactive, without performing an ad hoc special study, and the totals shown below reflect total business VoIP seats (both active and inactive). Again, VoIP “seats” are telephone numbers and are not equivalent to access lines, and should not be compared to an access line on an equivalent basis. This data is provided in the interest of showing the current scale of Qwest’s retail VoIP operations as of December 2007 in the states relevant to Qwest’s forbearance petitions.

**Qwest Retail VoIP Quantities: December 2007  
\*\*\*BEGIN HIGHLY CONFIDENTIAL\*\*\***

	<b>Residential Qwest VoIP Subscribers</b>	<b>Business Qwest VoIP Subscribers</b>	<b>Business Qwest VoIP Seats</b>
Washington			

**\*\*\*END HIGHLY CONFIDENTIAL\*\*\***