

**Qwest.**



*Spirit of Service*

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**Robert B. McKenna**  
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FILED/ACCEPTED

APR 29 2009

April 29, 2009

Federal Communications Commission  
Office of the Secretary

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W., Room TW B-204  
Washington, DC 20554

RE: Policy and Rules Concerning the Interstate Interexchange Marketplace;  
Implementation of Section 254(g) of the Communications Act of 1934, as  
Amended; CC Docket No. 96-61

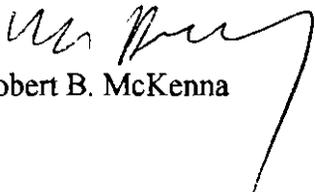
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Dear Ms. Dortch:

On behalf of Qwest Services Corporation, attached is the 2009 certification of compliance with the Commission's geographic rate averaging and rate integration requirements pursuant to 47 C.F.R. 64.1900.

If you have any questions, please contact me.

Respectfully submitted,

  
Robert B. McKenna

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**Certification of Compliance with Section 64.1801 of the Rules of the Federal  
Communications Commission –  
Rate Integration and Geographic Rate Averaging Rules**

I, Andrew Crain, having been duly sworn, attest as follows:

I am the Deputy General Counsel and Vice President, Qwest Corporation, acting on behalf of Qwest Communications Company, LLC (QCC), Qwest Corporation, Qwest LD Corp., and El Paso County Telephone Company. I am authorized to execute this certification on behalf of all of these entities.

These companies provide interstate interexchange telecommunications services that are subject to 47 USC Section 254(g) and Section 64.1801 of the Rules of the Federal Communications Commission.

I am familiar with the rules and regulations of the Federal Communications Commission concerning rate integration and rate averaging and with the interexchange telecommunications services of these companies.

Pursuant to Section 64.1900 of the Commission's rules, I hereby certify that, to the best of my knowledge, information and belief subject to the qualification noted below, no Qwest interstate offering subject to the certification requirements of Section 64.1900 violates the rate integration or rate averaging provisions of the Telecommunications Act of 1996, or the Commission's implementing rules. This affidavit is also made based on the understanding that:

- 1) QCC's Qwest Express Platform and Qwest Connect services, which are terminating access services purchased by Voice Mail, Broadcast Fax/Satellite/email, ISPs, ASPs, Telemarketers, and non-telecommunications carriers and which are priced based on the identity of the terminating LATA and bands within those LATA based on cost, are in compliance with the rate integration and rate averaging rules;
- 2) Qwest Private Line Services and QWave high capacity point to point private line optical services, provided under contract, reflect the cost of including the terminating carrier's service;
- 3) Qwest Choice Long Distance service in Montana is not identical to other states due to conditions placed on it by the Montana PSC. Specifically, the grandfathered services Qwest Choice Long Distance, Unlimited Long Distance Plan, and Preferred Unlimited in Montana are different from other states due to conditions placed on it by the Montana PSC, and the following promotions 600 Free Long Distance Minutes, Qwest Choice Home Plus & LD, Save/Winover offer one month free Choice Unlimited long distance with Qwest Choice Business local package, and Winback offer two months free Unlimited long distance when purchased with any Qwest local service are not available to Montana customers.

- 4) Qwest Long Distance Interstate Service Fee for the Qwest 15 Cent Single Rate Plan in Arizona is not identical to that fee in other states due to conditions placed on it by the Arizona PSC.
- 5) The following promotions 600 Free Long Distance Minutes, Qwest Choice Home Plus & LD, Save/Winover offer one month free Choice Unlimited long distance with Qwest Choice Business local package, and Winback offer two months free Unlimited long distance when purchased with any Qwest local service are not available to New Mexico customers due to conditions placed on them by the by the New Mexico PRC.
- 6) The Qwest Choice Long Distance Basic monthly fee is not identical to other states due to conditions placed on it by the Virginia SCC and the New York PSC.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief based on that the foregoing is true and correct.

Dated 4/28/09

  
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Andrew Crain