



**Qwest**  
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**Timothy M. Boucher**  
Associate General Counsel

November 5, 2010

**REDACTED – FOR PUBLIC INSPECTION**

***VIA ECFS – REDACTED VERSION***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *In the Matter of Jurisdictional Separations and Referral to the Federal-State Joint Board – Proposal by State Members of the Federal-State Joint Board for Interim Adjustments to Jurisdictional Separations Allocation Factors and Category Relationships Pending Comprehensive Reform, CC Docket No. 80-286.*

Dear Ms. Dortch,

Qwest Corporation (Qwest) hereby requests confidential treatment of the information contained in Attachment A of the attached *ex parte* in the above-captioned proceeding. This information is the confidential intellectual property of Telcordia Technologies, Inc. (Telcordia) which has been provided to Qwest under a contract that prohibits Qwest from disclosing Telcordia's confidential information without prior written consent. Telcordia has provided Qwest with such written consent which is conditioned upon Qwest requesting confidential treatment of the information under relevant Commission rules. The Telcordia information is trade secret and commercial information that is not routinely made available for public inspection. Such information should be afforded confidential treatment under both 47 C.F.R. § 0.457(d) and § 0.459.

Qwest provides justification for the confidential treatment of the information in Attachment A in the Appendix to this letter, pursuant to 47 C.F.R. §§ 0.457(d) and 0.459. If the Commission declines to classify the information contained in Attachment A of the *ex parte* as confidential information, Qwest requests that the voluntarily-provided information in Attachment A be returned to Qwest in accordance with 47 C.F.R. § 0.459(e). In the alternative, if the Commission determines that the information in Attachment A should be disclosed to certain interested parties, Qwest requests that the Commission issue a protective order governing any such disclosure.

Qwest is simultaneously submitting both a non-redacted version (via D.C. Courier) and a redacted version (via ECFS) of the *ex parte*. The non-redacted version of the *ex parte* is marked "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**". The redacted version of the *ex*

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*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 redacted version the confidential Attachment A has been omitted in its entirety.

This cover letter (and the *ex parte* except for Attachment A) does not contain any confidential information.

Qwest is including an original and two copies of the non-redacted *ex parte* for submission to the Secretary’s Office, with an extra copy provided to be stamped as received and returned to the courier. The redacted version of the *ex parte* is being filed via ECFS.

Please do not hesitate to contact me with any questions using the information in the letterhead.

Respectfully,

/s/ Timothy M. Boucher  
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Enclosures

cc: *See* listing of the Separations Joint Board members at the end of the *ex parte*.

## Confidentiality Justification

Qwest Corporation (Qwest) requests confidential treatment of certain information in Qwest's accompanying written *ex parte* on separations. The information that Qwest is requesting confidential treatment of is contained in Attachment A and is labeled "Figure 1-1. TDIS System Flow," "Table 1-1, TDIS Flow Glossary – Data Files" and "Table 1-2, TDIS Flow Glossary – Data Tables." This information is provided as an attachment in Qwest's written *ex parte* to the Federal Communications Commission (Commission) which provides an overview of the work that Qwest performed to update direct assignments prior to the Commission's separations freeze in 2001. This information is the confidential intellectual property of Telcordia Technologies, Inc. (Telcordia) which has been provided to Qwest under a contract (*i.e.*, "Master Agreement") which prohibits Qwest from disclosing Telcordia's confidential information without prior written consent. Telcordia has provided Qwest with such written consent which is conditioned upon Qwest requesting confidential treatment of the information under relevant Commission rules. The Telcordia information is trade secret information that is not routinely made available for public inspection. Such information should be afforded confidential treatment under both 47 C.F.R. § 0.457(d) and § 0.459.

### 47 C.F.R. § 0.457(d)

Information contained in the Attachment A is confidential and proprietary to Telcordia as "trade secrets and commercial or financial information" under Section 0.457(d). Disclosure of such information to the public would risk revealing Telcordia's confidential intellectual property. Therefore, in the normal course of Commission practice this information should be considered "Records not routinely available for public inspection."

### 47 C.F.R. § 0.459

Specific information in the Attachment A is also subject to protection under 47 C.F.R. § 0.459, as demonstrated below.

### Information for which confidential treatment is sought

Qwest requests that the information contained in Attachment A be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. This information contains Telcordia's trade secrets and is competitively-sensitive intellectual property which both Qwest and Telcordia maintain as confidential and is not normally made available to the public. Release of the information could have a substantial negative competitive impact on Telcordia. The confidential information is contained in the non-redacted version of Attachment A, which is marked with the following legend: **CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**

### Commission proceeding in which the information was submitted

The information is being submitted *In the Matter of Jurisdictional Separations and Referral to the Federal-State Joint Board – Proposal by State Members of the Federal-State Joint Board for Interim Adjustments to Jurisdictional Separations Allocation Factors and Category Relationships Pending Comprehensive Reform*, CC Docket No. 80-286.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The trade secret and commercial information designated as confidential is in the form of a detailed TDIS system flow and associated glossaries of data files and tables. As noted above, the information is trade secret and commercially-sensitive intellectual property which is not normally released to the public as such release could have a negative competitive impact on Telcordia.

Degree to which the information concerns a service that is subject to competition; and manner in which disclosure of the information could result in substantial competitive harm

The type of competitively-sensitive trade secrets and intellectual property in Attachment A would generally not be subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)), which demonstrates that the Commission already anticipates that the release of this kind of information likely would produce competitive harm. Telcordia's actions to protect this information from public disclosure confirm that release of its confidential and proprietary information would cause it competitive harm by allowing its competitors to become aware of proprietary intellectual property that Telcordia developed to support the separations activities of its clients.

Measures taken by Qwest to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosure of the information to third parties

Telcordia and Qwest have treated and treat the information disclosed in its non-redacted *ex parte* as confidential and has protected it from public disclosure to parties outside of the company.

Justification of the period during which Qwest asserts that the material should not be available for public disclosure

Neither Telcordia or Qwest can determine at this time any date on which this information should not be considered confidential or would become stale for purposes of the current inquiry.

Other information that Qwest believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable Commission and court rulings, the information in question should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act shields information that is (1) trade secret and commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The information in question satisfies this test.



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***EX PARTE***

***VIA ECFS – REDACTED VERSION***

November 5, 2010

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Room TW A-325  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *In the Matter of Jurisdictional Separations and Referral to the Federal-State Joint Board – Proposal by State Members of the Federal State Joint Board for Interim Adjustments to Jurisdictional Separations Allocation Factors and Category Relationships Pending Comprehensive Reform, CC Docket No. 80-286.*

Dear Ms. Dortch:

The Federal Communications Commission (Commission) froze jurisdictional separations allocation factors and category relationships as of July 1, 2001.<sup>1</sup> The original separations freeze was scheduled to expire in five years or upon the completion of comprehensive separations reform. The Commission has extended the freeze three separate times since the expiration of the original separations freeze in 2006.<sup>2</sup> One aspect of the freeze that has been the subject of much discussion is direct assignment and the obligations, if any, of rate-of-return and price cap carriers to update their direct assignments annually. Many parties appear to assume that updating direct assignments is a simple task and that the requirement in the *Separations Freeze Order* to update direct assignments applies equally to rate-of-return and price cap carriers. Neither assumption is correct.

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<sup>1</sup> See *In the Matter of Jurisdictional Separations and Referral to the Federal-State Joint Board*, Report and Order, 16 FCC Rcd 11382 (2001) (*Separations Freeze Order*) and 47 C.F.R. § 36.3.

<sup>2</sup> *In the Matter of Jurisdictional Separation and Referral to the Federal-State Joint Board*, Order and Further Notice of Proposed Rulemaking, 21 FCC Rcd 5516 (2006) (*2006 Freeze Notice*); see *In the Matter of Jurisdictional Separations and Referral to the Federal-State Joint Board*, Report and Order, 24 FCC Rcd 6162 (2009); see *In the Matter of Jurisdictional Separations and Referral to the Federal-State Joint Board*, Notice of Proposed Rulemaking, 25 FCC Rcd 3457 (2010).

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The purpose of this letter is to address the requirements of the *Separations Freeze Order* to update direct assignments annually and to provide an overview of the work that Qwest performed in updating direct assignments on a regular basis prior to the Commission's separations freeze.

#### Price Cap Carriers Are Not Required to Update Direct Assignments Annually

In its 2006 *Notice* prior to extending the separations freeze, the Commission noted that NARUC and USTelecom had different views regarding the application of the requirement in the 2001 *Separations Freeze Order* that direct assignments be updated annually and requested comment on this issue.<sup>3</sup> NARUC and other parties asserted that the Commission's *Separations Freeze Order* requires price cap carriers, like Qwest, to update direct assignments annually.<sup>4</sup> These parties are mistaken and mis-read the plain language of the separations rules adopted in the Commission's *Separations Freeze Order*. Under these rules, neither Qwest nor any other price cap carrier is required to update direct assignments annually.

The language that NARUC references on the requirement that direct costs be updated annually is contained in 47 C.F.R. § 36.3(a) of the Commission's separations rules and applies generally to all incumbent local exchange carriers (ILECs).<sup>5</sup> On the other hand, 47 C.F.R. § 36.3(b) applies specifically to ILECs subject to *price cap* regulation and requires that all investment categories and sub-categories and their percentage relationship to their Part 32 accounts be frozen. It is impossible both to annually update direct cost assignments and to meet this requirement.

Clearly, 47 C.F.R. § 36.3(b) is an exception to the general rule contained in 47 C.F.R. § 36.3(a). Thus, Part 36.3(b) prohibits ILECs subject to price cap regulation from directly assigning costs during the freeze period.<sup>6</sup> Standard rules of statutory construction dictate that when there is a conflict between a general rule and a specific rule, the specific rule controls.

Not only do the separations practices of Qwest and other price cap carriers comply with a reasonable reading of the Commission's Part 36 rules,<sup>7</sup> but Commission staff has provided

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<sup>3</sup> 2006 *Freeze Notice*, 21 FCC Rcd at 5531-32 ¶ 38.

<sup>4</sup> See National Association of Regulatory Utility Commissioners *ex parte* Letter to Ms. Dortch, Secretary, Federal Communications Commission, CC Docket No. 80-286, filed Apr. 6, 2006.

<sup>5</sup> 47 C.F.R. § 36.3(a)

<sup>6</sup> 47 C.F.R. § 36.3(b).

<sup>7</sup> Prior to the Commission's forbearance from enforcing its cost assignment and separations rules against Qwest in 2008, Qwest complied with the requirements of the separations freeze by using the separations factors and category relationships that existed on June 30, 2001.

similar advice concerning compliance with the direct assignment requirements of the *Separations Freeze Order*.<sup>8</sup>

In summary, the current separations rules do not require price cap carriers to update direct assignments annually. While there is no question that the Commission has the authority to modify its separations rules, it can only do so through a rulemaking proceeding which provides interested parties with notice of proposed rule changes and an opportunity for comment.<sup>9</sup> Qwest also notes that even if the Commission modified its rules to require price cap carriers to update direct assignments annually, any such requirement would not apply to Qwest or other carriers that have been granted forbearance from the Commission's cost assignment and separations rules.<sup>10</sup>

#### Procedures Required to Directly Assign Costs and Investment Are Quite Complex

Prior to the implementation of the separations freeze on July 1, 2001, Qwest and other large price cap ILECs separated costs between jurisdictions on a monthly basis.<sup>11</sup> Traditionally, jurisdictional separations has been a two-step process. The first step required carriers to assign regulated costs to various categories of plant and expenses.<sup>12</sup> In the second step, costs in each category were apportioned between the intrastate and interstate jurisdictions. These jurisdictional apportionments of categorized costs were based upon either: 1) direct assignment;

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<sup>8</sup> See Letter from Fatina Franklin, Assistant Division Chief, Industry Analysis and Technology Division, Federal Communications Commission, to Ms. Anne D. Berkowitz, Associate Director – Federal Regulatory, Verizon Communications, dated June 9, 2004. In addition to directing Verizon not to update its direct assignments, Ms. Franklin also acknowledges that in the *Separations Freeze Order* the Commission adopted a more limited freeze (*i.e.*, a factors-only freeze) for rate-of-return carriers.

<sup>9</sup> See 5 U.S.C. § 553. See also, 47 U.S.C. § 410(c).

<sup>10</sup> The Commission granted Qwest relief from the cost assignment rules, including the part 36 separations rules on September 8, 2008. This relief was conditioned upon the Wireline Competition Bureau's approval of Qwest's Compliance Plan. On December 31, 2008, the Bureau approved Qwest's Compliance Plan, as filed. See *In the Matter of AT&T Inc. for Forbearance Under 47 U.S.C. § 160 from Enforcement of Certain of the Commission's Cost Assignment Rules; Petition of BellSouth Telecommunications, Inc. for Forbearance Under 47 U.S.C. § 160 from Enforcement of Certain of the Commission's Cost Assignment Rules*, Memorandum Opinion and Order, 23 FCC Rcd 7302 (2008) and Public Notice, 23 FCC Rcd 18417 (2008).

<sup>11</sup> The Part 36 rules in effect at the time did not specifically require that costs be separated on a monthly basis.

<sup>12</sup> In certain instances, costs were further disaggregated among service categories.

2) relative use factors; or 3) fixed allocators.<sup>13</sup> As noted above, these category relationships and allocation factors were frozen for price cap ILECs as of July 1, 2001.<sup>14</sup>

The separations rules in effect prior to the freeze required ILECs to directly assign costs to the different jurisdictions where possible. While this requirement sounds simple enough, direct assignment is one of those simple concepts that is very burdensome to implement. The assumption underlying this requirement is that a carrier can determine the jurisdictional use of its equipment and directly assign equipment costs to the appropriate jurisdiction. Direct assignment is problematic because the jurisdictional use of telecommunications equipment is not reflected in ILEC plant records. Moreover, telephone plant is multipurpose and is used to provide many different types of services. As a result, the jurisdictional use of a given piece of plant investment may change over time as the services provided over the plant change. Consequently, the extent to which multipurpose plant investment is dedicated to interstate or intrastate usage or some mix of the two can and does change over time.<sup>15</sup>

As a practical matter, a carrier must first perform separations studies of its investment to determine what types of investment are used exclusively to provide interstate or intrastate services before any costs can be directly assigned.<sup>16</sup> This is because telephone plant is generally multi-purpose and ILEC plant records do not identify the jurisdictional nature of plant. Neither Qwest nor any other price cap LEC has prepared separations studies in the last decade for the frozen categories and allocation factors. Furthermore, none of the price cap carriers has either the necessary staff or support systems to conduct “traditional” separations studies at any time in

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<sup>13</sup> “The fundamental basis on which separations are made is the use of telecommunications plant in each of the operations. The first step is the assignment of the cost of the plant to categories. The basis for making this assignment is the identification of the plant assignable to each category and the determination of the cost of the plant so identified. The second step is the apportionment of the cost of the plant in each category among the operations by direct assignment where possible, and all remaining costs are assigned by the application of appropriate use factors.” 47 C.F.R. § 36.1(c).

<sup>14</sup> The specific category relationships and allocation factors were frozen based on data from the carriers’ calendar-year 2000 separations studies. *See Separations Freeze Order*, 16 FCC Rcd at 11414-16, Appendix B (2001).

<sup>15</sup> This varying usage would be a problem even with the 10% “contamination” rule in 47 C.F.R. § 36.154(a).

<sup>16</sup> As noted, the *Separations Freeze Order* relieved price cap carriers of the obligation to perform investment studies. *See Separations Freeze Order*, 16 FCC Rcd at 11404 ¶ 45. *See also*, Ms. Franklin’s Letter to Verizon Communications referenced in note 8, above.

the near future. Since the freeze was adopted in 2001, most of the Qwest employees previously-involved in managing and conducting separations studies have left the business or retired.<sup>17</sup>

In addition to losing trained separations employees, Qwest and other price cap companies do not have the support systems necessary to conduct separations cost studies. Prior to the separations freeze, Qwest and other former Bell Operating Companies (BOCs) obtained category relationship data and allocation factor data necessary for updating direct assignments from a highly complex and powerful information processing system called TIRKS Detailed Regulatory Interface System (TDIS) that was owned and maintained by Telecordia.<sup>18</sup> The attached TDIS system flow chart and associated glossary of data files and tables highlights the complexity of the work efforts to obtain the information necessary to update direct assignments.<sup>19</sup> Telecordia decommissioned TDIS shortly after the separations freeze went into effect in 2001 because there was no demand for it.

Prior to the separations freeze, Qwest and the BOCs also used another Telecordia system called Detailed Regulatory Monthly Allocation (DRMA) to obtain cumulative, categorized Central Office Equipment (COE) investment. DRMA provided both categorized COE investment as defined in Part 36 of the Commission's rules and the common and power investment factors that were required inputs to Qwest's system that produced separated results of operations and separated investment balances. Like TDIS, use of DRMA ended shortly after the separations freeze began because there was no business need for it.

Without TDIS and DRMA or functionally equivalent information processing systems, neither Qwest nor any other similarly-situated ILEC would be able to produce separations studies, including Part 36 category relationships and jurisdictional allocation factors necessary to update direct assignments. Reactivating TDIS and other computer-based separations support systems is really not an option almost a decade after their shutdown. The only real option would be (if it is required) to create new systems to serve, at a minimum, all large price cap carriers. The time and cost involved in creating, deploying and operating new data processing systems with the functionality of the decommissioned systems would obviously be considerable.

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<sup>17</sup> In 1999, prior to the freeze, Qwest maintained a separations staff of 47 people. By the end of 2001, Qwest's separations staff consisted of 25 people. Today, Qwest's separations staff consists of one full-time equivalent employee whose responsibilities are very limited.

<sup>18</sup> TDIS processed plant-related data such as mileage, stations, dollars of investment, loop data, and book cost per mile provided by Qwest systems to produce dollars of investment categorized according to the various Part 36 categories and factors necessary to calculate separated results of operations monthly.

<sup>19</sup> See Attachment A, TDIS System Flow and TDIS Flow Glossaries (a confidential document omitted from the redacted version of this *ex parte*).

The following outline provides a brief summary of the steps that it appears Qwest (and, in all likelihood, other price cap carriers) went through in order to identify directly assigned investment prior to the separations freeze.<sup>20</sup>

CES (Circuit Equipment Study) — A/C 2230 Transmission

- For each Study area, investment was collected within the COCA (Central Office Cost Accounting) System which provided groups of similar (functionally used) equipment costs through ECN (Equipment Category Number) coding detail. COCA required/did catalog look-ups of CPR (Continuing Property Record) codes to ensure the correctness of the ECN assignments at each accounting location. These costs were updated and maintained on a monthly basis from files out of the PICS/DCPR Engineering inventory system.
- Routine consultation was performed with the PICS Technical staff regarding equipment, FRC and account coding. This included equipment catalog and DCPR corrections as well as new services for classification.
- At the time of the Study, COCA created an investment data file of these costs, which was summed up by location (Common Language Location Identifier), FRC, ECN and dollar amount. This file (DRO8) was loaded into a mechanized System/Process called TDIS (TIRKS Detailed Regulatory Interface System).
- From TIRKS (Trunk Inventory Record Keeping System), detailed assignment (usage) records were used to identify message and private line individual circuits and circuit (carrier) systems. TIRKS interfaced with TDIS, which was used as the translation system interface between TIRKS and our study processes. This was accomplished through (DRDD) code tables, which were routinely kept up to date.
- This step provided the information needed to determine how the equipment is being used and the required weighted percentage breakdowns of complex circuit systems.
- The processed records (within TIRKS) were linked to the investment costs (in COCA) by having ECN codes assigned to them.

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<sup>20</sup> This outline was contained in Qwest's historical separations files addressing investment basic studies and the steps necessary to identify directly assigned investments. Qwest has been unable to identify any current employees that were directly involved in conducting or overseeing separations/investment studies prior to the separations freeze. Thus, Qwest cannot confirm with absolute certainty that this is a complete list of the steps performed pre-freeze or that it performed all the steps listed. But, Qwest reasonably believes that is the case.

- The assignment record information, which included circuit usage by location (CLLI), relay rack, ECN and detailed regulatory class codes (DRDD), was downloaded into the TDIS - CES process, which broke down the equipment between message and private line (components).
- The CES Process then matched the investment by Common Language Location Identifier (CLLI) and ECN to the usage by CLLI and ECN.
- At this point, the circuit investment was summed to the area level into Category 4 parts.

C&WF (Cable & Wire Facilities) — A/C 2410

- For each Study area the Cable investment was downloaded from the Company's detailed continuing property record (formerly know as DOPAC).
- This provided investment accumulated by study area, account, FRC, material codes/description, ending balance and quantity.
- Files were created with this data and loaded into the TDIS mechanized process.
- Other corporate reports were also required for certain investment (submarine) input as well as record balancing.
- From TIRKS, the facilities database provided the cable assignment records (broken up between message and private line).
- These records were fed into TDIS, which then produced weighted unit values.
- These values were subsequently loaded into the mechanized study process.
- Combined with the cost values from the detailed investment, TDIS calculated the Category breakdown of Cable investment, which included those categories or subcategories that were directly assigned.

TIRKS & TDIS – common support systems for CES and C&WF - Required

- Review and validation of the output of the 15 Autogen (Automatic Generation) processes performed monthly
- Review of circuit and facility encoding processes
  - the investigation and resolution of errors found
- Maintenance of consistent, current and accurate Detailed Regulatory Display Databases (DRDD)
- Analysis, validation and update of 33 TDIS reference data tables as required review, prioritization and resolution of TDIS error reports

- Investigation and recommendation of corrective action regarding Network Operations errors effecting Separations

COCA - Required

- Coordination/download/verification of input files from PICS/DCPR
- Maintenance of the COCA system and processor
- Documentation of changes and updates

It is likely that a similar set of work efforts would be required if price cap carriers were required to update their direct assignments in the future. This would be an enormous task since many of the databases and support systems referenced in the above outline are no longer in use and would need to be recreated.

Requiring Price Cap Carriers to Update Direct Assignment Annually Would Not Lead to Greater Accuracy in Jurisdictional Cost Assignments

Even if the ILECs were to resurrect the systems and obtain technical experts necessary to reestablish the preparation of monthly separations studies,<sup>21</sup> those studies would not lead to greater accuracy in jurisdictional cost assignments. This is because the Part 36 rules are largely based on circuit-switched technology, an out-dated technology,<sup>22</sup> and do not take into account packet switched traffic and other emerging technologies.<sup>23</sup> Furthermore, the existing cost allocation rules -- including the rules governing direct assignments are arbitrary and reflect decades of political compromises.<sup>24</sup> From an economic standpoint, it is simply not possible to have an "accurate" set of separations rules for allocating common costs because there is no

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<sup>21</sup> In addition to separations systems, Qwest does not have personnel with technical expertise in the preparation of separations studies. Virtually all of Qwest's separations staff with the technical expertise to understand and perform complex separations processes and procedures are no longer employed at Qwest. Hiring and training staff with separations expertise would be a difficult and lengthy task.

<sup>22</sup> Prior to the advent of packet switching virtually all switched telecommunications traffic was routed through a circuit switch. Consequently, carriers could get a reasonable estimate of the jurisdictional nature of traffic by measuring traffic, DEMs, at the switch. This is no longer true.

<sup>23</sup> "Traditional" packet switching is being replaced by Internet-based packet switching using IP protocol.

<sup>24</sup> A good example of such a political compromise that affects direct assignment is the "Mixed Use" Rule which designates all dedicated circuits (*i.e.*, private line/special access circuits) with more than 10% interstate traffic as interstate circuits. 47 C.F.R. § 36.154(a). This means that a private line/special access circuit would still be classified as an interstate line even though up to 90 percent of the traffic on the line was intrastate traffic.

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“correct” answer in almost all cases. Thus, even if it were possible to conduct new separations studies, the results would not lead to greater accuracy in jurisdictional cost assignments.

Please contact me if you have any questions.

Sincerely,

/s/Timothy M. Boucher

cc: (via e-mail) Jurisdictional Separations Federal-State Joint Board Members (Redacted Version only)

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Attachment A: TDIS Flow chart and associated glossaries.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT A**

**REDACTED IN ITS ENTIRETY**