

Melissa E. Newman
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REDACTED – FOR PUBLIC INSPECTION

VIA COURIER

January 18, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: *In the Matter of Developing a Unified Intercarrier Compensation Regime,*
CC Docket No. 01-92

Dear Ms. Dortch:

In response to the request of the FCC, Qwest Communications International Inc. (Qwest) hereby submits intercarrier compensation-related data for Qwest Corporation (QC) and Qwest Communications Company, LLC (QCC) in the above-referenced proceeding.

Qwest seeks confidential treatment of the attached data pursuant to the September 16, 2010 Protective Order in CC Docket No. 01-92, WC Docket Nos. 05-337, 07-135 and 10-90 and GN Docket No. 09-51, 25 FCC Rcd 13160 (2010). Qwest also notes that notwithstanding the Protective Order, there is a separate statutory basis for not making this confidential information available for public inspection. 47 C.F.R. §§ 0.457(d), 0.459. Thus, Qwest also seeks confidential treatment of its data filed in CC Docket No. 01-92 pursuant to 47 C.F.R. §§ 0.457(d) and 0.459, for which it provides justification in the attached Appendix. Qwest considers the data to be confidential trade secret, commercial information that is “not routinely available for public inspection.” 47 C.F.R. § 0.457(d).

It was not feasible to physically separate the confidential information from the non-confidential information, per 47 C.F.R. § 0.459(a), so Qwest is filing non-redacted and redacted versions. Pursuant to paragraphs 4 and 13 of the Protective Order, Qwest has marked each page of its submission (non-redacted version) as follows: **CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) – SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.** Each page of the redacted version of its submission is marked: **REDACTED – FOR PUBLIC INSPECTION.** This cover letter

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January 18, 2011

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(including Appendix) contains no confidential information and is included (with the same text except for the markings) with both the non-redacted and redacted versions of the submission.

Qwest considers information contained in its submission to be confidential, and proprietary as “trade secrets” and/or “commercial information” or is otherwise confidential under Section 0.457(d) and the September 16, 2010 Protective Order. The Protective Order defines “Confidential Information” (at paragraph 3) as “information contained in a Stamped Confidential Document or derived therefrom that is not otherwise available from publicly available sources[.]” Qwest considers its information to be confidential and of substantial sensitivity because it is relevant to Qwest’s ongoing business operations and includes specific financial information that relates to intercarrier compensation expenses and revenues between 2006 and 2009, residential access and demand data and data relevant to intercarrier compensation disputes with other carriers. Not withholding from public inspection this type of confidential information would risk revealing company-sensitive proprietary commercial and financial information and have a substantial negative competitive impact on Qwest. Given the extreme sensitivity of this information, pursuant to paragraph 5 of the Protective Order, Qwest is designating it: **Additional Copying Prohibited.**

For the non-redacted version of the filing, Qwest is submitting via courier one copy with the Office of the Secretary, along with an additional copy to be stamped and returned to the courier. As to the redacted version of the submission, wherein the confidential information has been omitted, Qwest is filing it via the FCC’s Electronic Comment Filing System. Also, pursuant to paragraphs 4 and 13 of the Protective Order, two copies of the non-redacted version (with confidential information) are being delivered to Lynne Hewitt Engledow, Pricing Policy Division, Wireline Competition Bureau, Federal Communications Commission at 445 12th Street, S.W., Washington, DC 20554.

Please contact me at 202.429.3120 if you have any questions.

/s/ Melissa E. Newman

Melissa E. Newman
Vice President-Federal Relations

Attachments

Two copies (non-redacted version): Lynne Hewitt Engledow

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APPENDIX

Confidentiality Request and Justification

Qwest requests confidential treatment of information included with its January 18, 2011 letter, pursuant to the Protective Order in WC Docket No. 01-92, released on September 16, 2010, as well as pursuant to 47 C.F.R. §§ 0.457(d), 0.459.

47 C.F.R. § 0.457(d)

Qwest considers information contained in its submission to be confidential, and proprietary as “trade secrets” and/or “commercial information” or is otherwise confidential under Section 0.457(d) and the Protective Order. This Protective Order defines “Confidential Information” (at paragraph 3) as “information contained in a Stamped Confidential Document or derived therefrom that is not otherwise available from publicly available sources[.]” Qwest considers its information to be confidential and of substantial sensitivity because it is relevant to Qwest’s ongoing business operations and includes specific financial information that relates to intercarrier compensation expenses and revenues between 2006 and 2009, residential access and demand data and data relevant to intercarrier compensation disputes with other carriers. The type of confidential information includes residence line weighted average rates and stand alone line demand data for the 14 states in which QC operates; interstate and intrastate originating and terminating usage expense, minutes-of-use and other data for QCC; and 14-state revenue and operating expense data for QC. Not withholding from public inspection this type of confidential information would risk revealing company-sensitive proprietary commercial and financial information. Pursuant to paragraphs 4 and 13 of the Protective Order, Qwest has marked each page of its submission (non-redacted version) as follows: **CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) – SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.** Given the extreme sensitivity of this information, pursuant to paragraph 5 of the Protective Order, Qwest has included the annotation: **Additional Copying Prohibited.** Each page of the redacted version of its submission is marked: **REDACTED – FOR PUBLIC INSPECTION.**

Qwest also seeks non-disclosure to the public of the information it has designated confidential under Section 0.457(d). This information is described in the preceding paragraph and involves Qwest’s ongoing business operations, including specific financial information that relates to intercarrier compensation expenses and revenues between 2006 and 2009, residential access and demand data and data relevant to intercarrier compensation disputes with other carriers.

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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 included with Qwest’s submission 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 confidential information included with its submission be withheld from public disclosure under Exemption 4 of the Freedom of Information Act. The submission contains sensitive trade secrets, commercial/financial or other information which Qwest maintains as proprietary and/or confidential and is not normally made available to the public. Release of the information could have a substantial negative competitive impact on Qwest. Pursuant to paragraphs 4 and 13 of the Protective Order, Qwest has marked each page of its submission (non-redacted version) as follows: **CONFIDENTIAL INFORMATION (ADDITIONAL COPYING PROHIBITED) – SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.** Given the extreme sensitivity of this information, pursuant to paragraph 5 of the Protective Order, Qwest has included the annotation: **Additional Copying Prohibited.**

Commission proceeding in which the information was submitted

The filing is being submitted in *In the Matter of Developing a Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92.

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

The information designated as confidential contains sensitive trade secrets, commercial/financial or other information which Qwest maintains as proprietary and withholds from public inspection. Release of the information could have a substantial negative competitive impact on Qwest.

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 trade secrets or commercial/financial information characterized as confidential is relevant to Qwest’s ongoing business operations and includes specific financial information that

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relates to intercarrier compensation expenses and revenues between 2006 and 2009, residential access and demand data and data relevant to intercarrier compensation disputes with other carriers. The type of confidential information includes residence line weighted average rates and stand alone line demand data for the 14 states in which QC operates; interstate and intrastate originating and terminating usage expense, minutes-of-use and other data for QCC; and 14-state revenue and operating expense data for QC. This sensitive or proprietary internal Qwest confidential commercial/financial information contained in the submission 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. Qwest confirms that release of this information would cause it competitive harm by allowing competitors to become aware of sensitive trade secrets, commercial/financial or other confidential information regarding the operation of Qwest's business as it relates to the provision of access services and intercarrier compensation.

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

Qwest has treated and treats the information disclosed in this submission 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

Qwest cannot determine at this time any date on which this information should not be considered confidential, or would become stale for purposes of the current action, except that the information would be handled in conformity with general Qwest records retention policies, absent any continuing legal hold on the data.

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 secrets or commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The information in question satisfies this test.

This workbook summarizes responses to the FCC request in January 2011 to provide QC and QCC intercarrier compensation financials by state for 2006-2009 and for the residential line rates and demand for stand alone lines(i.e., lines not part of a packages).

RESIDENCE LINE WEIGHTED AVERAGE RATES AND STAND ALONE LINE DEMAND										
State	Stand Alone Residential Line Demand *1	% Using Bundle	Residential Line Rate *2	EAS	Zone Increment	Intrastate Access Charge	Total Before SLC	Subscriber Line Charge (SLC)	Total Weighted Monthly Rate Per Line	
AZ			\$ 12.92	*3	\$ 0.16	NA	\$ 13.07	\$ 6.07	\$ 19.14	
CO			\$ 17.00	*3	NA	NA	\$ 17.00	\$ 6.46	\$ 23.46	
IA			\$ 19.10	*3	NA	NA	\$ 19.10	\$ 4.77	\$ 23.87	
ID			\$ 21.60	*3	NA	NA	\$ 21.60	\$ 6.36	\$ 27.96	
MN			\$ 15.51	\$ 0.59	NA	NA	\$ 16.10	\$ 4.90	\$ 21.00	
MT			\$ 14.73	*3	NA	NA	\$ 14.73	\$ 6.53	\$ 21.26	
ND			\$ 18.00	\$ 1.06	NA	NA	\$ 19.06	\$ 6.51	\$ 25.57	
NE			\$ 18.02	\$ 1.27	NA	NA	\$ 19.30	\$ 4.72	\$ 24.02	
NM			\$ 14.50	\$ 0.25	NA	\$ 1.59	\$ 16.34	\$ 6.54	\$ 22.88	
OR			\$ 12.95	\$ 2.34	NA	NA	\$ 15.29	\$ 6.47	\$ 21.77	
SD			\$ 19.25	*3	NA	NA	\$ 19.25	\$ 6.40	\$ 25.65	
UT			\$ 13.00	\$ 2.67	NA	NA	\$ 15.67	\$ 6.28	\$ 21.95	
WA			\$ 13.50	*3	NA	NA	\$ 13.50	\$ 5.76	\$ 19.26	
WY			\$ 23.10	\$ 0.23	\$ 10.78	NA	\$ 34.10	\$ 6.53	\$ 40.63	

NOTES:

*1 Includes both initial and additional residential lines that are not part of a package.

*2 Avg residential rate excludes resale lines.

*3 In this state, the EAS rate is included as part of the line rate.

*4 El Paso County Telephone Co. is not included.

QCC Inter-carrier Compensation Expenses					
	Interstate		Intrastate		Total
	Originating	Terminating	Originating	Terminating	
2006 Usage Expense DTT and Trunk Ports Expense MOUs					
2007 Usage Expense DTT and Trunk Ports Expense MOUs					
2008 Usage Expense DTT and Trunk Ports Expense MOUs					
2009 Usage Expense DTT and Trunk Ports Expense MOUs					
Notes: 1. Entrance Facilities excluded 2. QCC Usage includes payments made to other carriers which terminate traffic to LECs - including Least Cost Routed 3. Switched Access includes Jointly Provided Switched Access 4. Expenses associated with IDDD are not included					

Response to 4.h.ii of FCC's November 13, 2009 Public Notice #19 (DA 09-2419)
 Identify total intercarrier compensation revenues as a percentage of total revenues (total regulated revenues and as a percentage of overall revenues). Identify total intercarrier compensation expenses as a percentage of total expenses (total regulated expenses and as a percentage of overall expenses). Responses should explain any assumptions and any response should include both revenues and expenses.

2006 Annual	QC Regulated	QC Overall	QCC
Revenues			
Intercarrier Compensation			na
Total			na
Percentage			na
Operating Expenses			
Intercarrier Compensation			
Total			
Percentage			
2007 Annual			
	QC Regulated	QC Overall	
Revenues			
Intercarrier Compensation			na
Total			na
Percentage			na
Operating Expenses			
Intercarrier Compensation			
Total			
Percentage			
2008 Annual			
	QC Regulated	QC Overall	
Revenues			
Intercarrier Compensation			na
Total			na
Percentage			na
Operating Expenses			
Intercarrier Compensation			
Total			
Percentage			
2009 Annual			
	QC Regulated	QC Overall	
Revenues			
Intercarrier Compensation			na
Total			na
Percentage			na
Operating Expenses			
Intercarrier Compensation			
Total			
Percentage			

Response to 4.h.i of FCC's November 13, 2009 Public Notice #19 (DA 09-2419)									
Qwest Inter-carrier Compensation Revenues and Expenses									
2006	TOTAL	AZ	CO	IA	ID	MN	MT	ND	NE
QC (RBOC) Annual Revenues									
Switched Access from Interexchange Carriers									
INTERSTATE									
Originating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	21,377,252,493								
MOUs - Tandem Switching (includes JPSA)	5,238,260,421								
Terminating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	15,831,482,126								
MOUs - Tandem Switching (includes JPSA)	17,393,423,057								
INTRASTATE									
Originating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	5,488,732,032								
MOUs - Tandem Switching (includes JPSA)	2,140,199,858								
Terminating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	5,378,764,180								
MOUs - Tandem Switching (includes JPSA)	5,882,151,871								
TOTAL O+T									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	48,076,230,831								
MOUs - Tandem Switching (includes JPSA)	30,654,035,207								
Switched Access Rates Applied When Other LECs Are IntraLATA Toll Providers									
Terminating									
Usage (MOU Related Charges)									
MOUs									
Reciprocal Compensation									
CLEC									
Local Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Wireless									
IntraMTA Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
QC (RBOC) Annual Expenses									
INTRASTATE Switched Access Rates Applied By Other LECs When QC is IntraLATA Toll Provider									
Originating									
Usage (MOU Related Charges)									
MOUs									
Terminating									
Usage (MOU Related Charges)									
MOUs									
Reciprocal Compensation									
CLEC									
Local Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Wireless									
IntraMTA Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Notes:									
1. Entrance Facilities excluded									
2. Usage related ISUP SS7 Signaling excluded									
3. Switched Access includes Jointly Provided Switched Access (JPSA)									
4. Recip Comp includes Local and ISP, but not disputed VNXX									
5. Transit revenues are not included									
QC (RBOC) Composite Rates Per MOU									
Switched Access from Interexchange Carriers									
Interstate Originating									
Interstate Terminating									
Intrastate Originating									
Intrastate Terminating									
Interstate Originating + Terminating									
Intrastate Originating + Terminating									
Total Switched Access									
Notes:									
1. Composite Rates Per MOU are computed by dividing by Local Switching MOUs, but includes tandem expenses in the numerator, including Jointly Provided Switched Access (JPSA) expenses. This, in addition to the fact that JPSA traffic is predominantly terminating, results in the terminating composite rates being higher than the originating rates.									

Response to 4.h.i of FCC's November 13, 2009 P						
Qwest Intercarrier Compensation Revenues and						
2006	NM	OR	SD	UT	WA	WY
QC (RBOC) Annual Revenues						
Switched Access from Interexchange Carriers						
INTERSTATE						
Originating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Terminating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
INTRASTATE						
Originating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Terminating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
TOTAL O+T						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Switched Access Rates Applied When Other LE						
Terminating						
Usage (MOU Related Charges)						
MOUs						
Reciprocal Compensation						
CLEC						
Local Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Wireless						
IntraMTA Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
QC (RBOC) Annual Expenses						
INTRASTATE Switched Access Rates Applied B						
Originating						
Usage (MOU Related Charges)						
MOUs						
Terminating						
Usage (MOU Related Charges)						
MOUs						
Reciprocal Compensation						
CLEC						
Local Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Wireless						
IntraMTA Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Notes:						
1. Entrance Facilities excluded						
2. Usage related ISUP SS7 Signaling excluded						
3. Switched Access includes Jointly Provided Switc						
4. Recip Comp includes Local and ISP, but not disp						
5. Transit revenues are not included						
QC (RBOC) Composite Rates Per MOU						
Switched Access from Interexchange Carriers						
Interstate Originating						
Interstate Terminating						
Intrastate Originating						
Intrastate Terminating						
Interstate Originating + Terminating						
Intrastate Originating + Terminating						
Total Switched Access						
Notes:						
1. Composite Rates Per MOU are computed by divi						
addition to the fact that JPSA traffic is predomina						

Response to 4.h.i of FCC's November 13, 2009 Public Notice #19 (DA 09-2419)									
Qwest Inter-carrier Compensation Revenues and Expenses									
2007	TOTAL	AZ	CO	IA	ID	MN	MT	ND	NE
QC (RBOC) Annual Revenues									
Switched Access from Interexchange Carriers									
INTERSTATE									
Originating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	19,443,983,943								
MOUs - Tandem Switching (includes JPSA)	5,238,414,809								
Terminating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	14,293,224,495								
MOUs - Tandem Switching (includes JPSA)	17,455,892,674								
INTRASTATE									
Originating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	5,088,497,827								
MOUs - Tandem Switching (includes JPSA)	1,872,820,876								
Terminating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	4,991,708,968								
MOUs - Tandem Switching (includes JPSA)	5,825,631,456								
TOTAL O+T									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	43,817,415,233								
MOUs - Tandem Switching (includes JPSA)	30,392,759,815								
Switched Access Rates Applied When Other LECs Are IntraLATA Toll Providers									
Terminating									
Usage (MOU Related Charges)									
MOUs									
Reciprocal Compensation									
CLEC									
Local Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Wireless									
IntraMTA Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
QC (RBOC) Annual Expenses									
INTRASTATE Switched Access Rates Applied By Other LECs When QC Is IntraLATA Toll Provider									
Originating									
Usage (MOU Related Charges)									
MOUs									
Terminating									
Usage (MOU Related Charges)									
MOUs									
Reciprocal Compensation									
CLEC									
Local Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Wireless									
IntraMTA Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Notes:									
1. Entrance Facilities excluded									
2. Usage related ISUP SS7 Signaling excluded									
3. Switched Access includes Jointly Provided Switched Access (JPSA)									
4. Recip Comp includes Local and ISP, but not disputed VNXX									
5. Transit revenues are not included									
QC (RBOC) Composite Rates Per MOU									
Switched Access from Interexchange Carriers									
Interstate Originating									
Interstate Terminating									
Intrastate Originating									
Intrastate Terminating									
Interstate Originating + Terminating									
Intrastate Originating + Terminating									
Total Switched Access									
Notes:									
1. Composite Rates Per MOU are computed by dividing by Local Switching MOUs, but includes tandem expenses in the numerator, including Jointly Provided Switched Access (JPSA) expenses. This, in addition to the fact that JPSA traffic is predominantly terminating, results in the terminating composite rates being higher than the originating rates.									

Response to 4.h.i of FCC's November 13, 2009 Pl							
Qwest Inter-carrier Compensation Revenues and Expenses							
2007	NM	OR	SD	UT	WA	WY	
QC (RBOC) Annual Revenues							
Switched Access from Interexchange Carriers							
INTERSTATE							
Originating							
Usage (MOU Related Charges)							
Dedicated (DTT and Dedicated Trunk Ports)							
MOUs - Local Switching (End Office)							
MOUs - Tandem Switching (includes JPSA)							
Terminating							
Usage (MOU Related Charges)							
Dedicated (DTT and Dedicated Trunk Ports)							
MOUs - Local Switching (End Office)							
MOUs - Tandem Switching (includes JPSA)							
INTRASTATE							
Originating							
Usage (MOU Related Charges)							
Dedicated (DTT and Dedicated Trunk Ports)							
MOUs - Local Switching (End Office)							
MOUs - Tandem Switching (includes JPSA)							
Terminating							
Usage (MOU Related Charges)							
Dedicated (DTT and Dedicated Trunk Ports)							
MOUs - Local Switching (End Office)							
MOUs - Tandem Switching (includes JPSA)							
TOTAL O+T							
Usage (MOU Related Charges)							
Dedicated (DTT and Dedicated Trunk Ports)							
MOUs - Local Switching (End Office)							
MOUs - Tandem Switching (includes JPSA)							
Switched Access Rates Applied When Other LEC							
Terminating							
Usage (MOU Related Charges)							
MOUs							
Reciprocal Compensation							
CLEC							
Local Usage (MOU Related Charges)							
Dedicated (DTT)							
MOUs - Billable							
MOUs - Bill and Keep							
Wireless							
IntraMTA Usage (MOU Related Charges)							
Dedicated (DTT)							
MOUs - Billable							
MOUs - Bill and Keep							
QC (RBOC) Annual Expenses							
INTRASTATE Switched Access Rates Applied By							
Originating							
Usage (MOU Related Charges)							
MOUs							
Terminating							
Usage (MOU Related Charges)							
MOUs							
Reciprocal Compensation							
CLEC							
Local Usage (MOU Related Charges)							
Dedicated (DTT)							
MOUs - Billable							
MOUs - Bill and Keep							
Wireless							
IntraMTA Usage (MOU Related Charges)							
Dedicated (DTT)							
MOUs - Billable							
MOUs - Bill and Keep							
Notes:							
1. Entrance Facilities excluded							
2. Usage related ISUP SS7 Signaling excluded							
3. Switched Access includes Jointly Provided Switch							
4. Recip Comp includes Local and ISP, but not displ							
5. Transit revenues are not included							
QC (RBOC) Composite Rates Per MOU							
Switched Access from Interexchange Carriers							
Interstate Originating							
Interstate Terminating							
Intrastate Originating							
Intrastate Terminating							
Interstate Originating + Terminating							
Intrastate Originating + Terminating							
Total Switched Access							
Notes:							
1. Composite Rates Per MOU are computed by divic							
addition to the fact that JPSA traffic is predomina							

Response to 4.h.i of FCC's November 13, 2009 Public Notice #19 (DA 09-2419)										
Qwest Inter-carrier Compensation Revenues and Expenses										
2008	TOTAL	AZ	CO	IA	ID	MN	MT	ND	NE	
QC (RBOC) Annual Revenues										
Switched Access from Interexchange Carriers										
INTERSTATE										
Originating										
Usage (MOU Related Charges)										
Dedicated (DTT and Dedicated Trunk Ports)										
MOUs - Local Switching (End Office)	17,449,750,869									
MOUs - Tandem Switching (includes JPSA)	4,821,399,192									
Terminating										
Usage (MOU Related Charges)										
Dedicated (DTT and Dedicated Trunk Ports)										
MOUs - Local Switching (End Office)	13,269,678,011									
MOUs - Tandem Switching (includes JPSA)	18,199,793,686									
INTRASTATE										
Originating										
Usage (MOU Related Charges)										
Dedicated (DTT and Dedicated Trunk Ports)										
MOUs - Local Switching (End Office)	4,513,909,759									
MOUs - Tandem Switching (includes JPSA)	1,504,280,084									
Terminating										
Usage (MOU Related Charges)										
Dedicated (DTT and Dedicated Trunk Ports)										
MOUs - Local Switching (End Office)	4,494,992,352									
MOUs - Tandem Switching (includes JPSA)	5,341,840,086									
TOTAL O+T										
Usage (MOU Related Charges)										
Dedicated (DTT and Dedicated Trunk Ports)										
MOUs - Local Switching (End Office)	39,728,330,991									
MOUs - Tandem Switching (includes JPSA)	29,867,313,048									
Switched Access Rates Applied When Other LECs Are IntraLATA Toll Providers										
Terminating										
Usage (MOU Related Charges)										
MOUs										
Reciprocal Compensation										
CLEC										
Local Usage (MOU Related Charges)										
Dedicated (DTT)										
MOUs - Billable										
MOUs - Bill and Keep										
Wireless										
IntraMTA Usage (MOU Related Charges)										
Dedicated (DTT)										
MOUs - Billable										
MOUs - Bill and Keep										
QC (RBOC) Annual Expenses										
INTRASTATE Switched Access Rates Applied By Other LECs When QC is IntraLATA Toll Provider										
Originating										
Usage (MOU Related Charges)										
MOUs										
Terminating										
Usage (MOU Related Charges)										
MOUs										
Reciprocal Compensation										
CLEC										
Local Usage (MOU Related Charges)										
Dedicated (DTT)										
MOUs - Billable										
MOUs - Bill and Keep										
Wireless										
IntraMTA Usage (MOU Related Charges)										
Dedicated (DTT)										
MOUs - Billable										
MOUs - Bill and Keep										
Notes:										
1. Entrance Facilities excluded										
2. Usage related ISUP SS7 Signaling excluded										
3. Switched Access includes Jointly Provided Switched Access (JPSA)										
4. Recip Comp includes Local and ISP, but not disputed VNXX										
5. Transit revenues are not included										
QC (RBOC) Composite Rates Per MOU										
Switched Access from Interexchange Carriers										
Interstate Originating										
Interstate Terminating										
Intrastate Originating										
Intrastate Terminating										
Interstate Originating + Terminating										
Intrastate Originating + Terminating										
Total Switched Access										
Notes:										
1. Composite Rates Per MOU are computed by dividing by Local Switching MOUs, but includes tandem expenses in the numerator, including Jointly Provided Switched Access (JPSA) expenses. This, in addition to the fact that JPSA traffic is predominantly terminating, results in the terminating composite rates being higher than the originating rates.										

Response to 4.h.i of FCC's November 13, 2009 Public Comment						
Qwest Inter-carrier Compensation Revenues and Expenses						
2008	NM	OR	SD	UT	WA	WY
QC (RBOC) Annual Revenues						
Switched Access from Interexchange Carriers						
INTRASTATE						
Originating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Terminating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
INTRASTATE						
Originating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Terminating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
TOTAL O+T						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Switched Access Rates Applied When Other LEC						
Terminating						
Usage (MOU Related Charges)						
MOUs						
Reciprocal Compensation						
CLEC						
Local Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Wireless						
IntraMTA Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
QC (RBOC) Annual Expenses						
INTRASTATE Switched Access Rates Applied By						
Originating						
Usage (MOU Related Charges)						
MOUs						
Terminating						
Usage (MOU Related Charges)						
MOUs						
Reciprocal Compensation						
CLEC						
Local Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Wireless						
IntraMTA Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Notes:						
1. Entrance Facilities excluded						
2. Usage related ISUP SS7 Signaling excluded						
3. Switched Access includes Jointly Provided Switch						
4. Recip Comp includes Local and ISP, but not displ.						
5. Transit revenues are not included						
QC (RBOC) Composite Rates Per MOU						
Switched Access from Interexchange Carriers						
Interstate Originating						
Interstate Terminating						
Intrastate Originating						
Intrastate Terminating						
Interstate Originating + Terminating						
Intrastate Originating + Terminating						
Total Switched Access						
Notes:						
1. Composite Rates Per MOU are computed by dividing total revenues by total minutes in addition to the fact that JPSA traffic is predominant						

Response to 4.h.i of FCC's November 13, 2009 Public Notice #19 (DA 09-2419)									
Qwest Inter-carrier Compensation Revenues and Expenses									
2009	TOTAL	AZ	CO	IA	ID	MN	MT	ND	NE
QC (RBOC) Annual Revenues									
Switched Access from Interexchange Carriers									
INTERSTATE									
Originating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	15,307,799,594								
MOUs - Tandem Switching (includes JPSA)	4,631,573,207								
Terminating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	11,209,472,478								
MOUs - Tandem Switching (includes JPSA)	14,920,917,649								
INTRASTATE									
Originating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	3,905,103,867								
MOUs - Tandem Switching (includes JPSA)	1,270,885,528								
Terminating									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	3,953,714,804								
MOUs - Tandem Switching (includes JPSA)	4,542,525,327								
TOTAL O+T									
Usage (MOU Related Charges)									
Dedicated (DTT and Dedicated Trunk Ports)									
MOUs - Local Switching (End Office)	34,376,090,743								
MOUs - Tandem Switching (includes JPSA)	25,365,901,711								
Switched Access Rates Applied When Other LECs Are IntraLATA Toll Providers									
Terminating									
Usage (MOU Related Charges)									
MOUs									
Reciprocal Compensation									
CLEC									
Local Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Wireless									
IntraMTA Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
QC (RBOC) Annual Expenses									
INTRASTATE Switched Access Rates Applied By Other LECs When QC is IntraLATA Toll Provider									
Originating									
Usage (MOU Related Charges)									
MOUs									
Terminating									
Usage (MOU Related Charges)									
MOUs									
Reciprocal Compensation									
CLEC									
Local Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Wireless									
IntraMTA Usage (MOU Related Charges)									
Dedicated (DTT)									
MOUs - Billable									
MOUs - Bill and Keep									
Notes:									
1. Entrance Facilities excluded									
2. Usage related ISUP SS7 Signaling excluded									
3. Switched Access includes Jointly Provided Switched Access (JPSA)									
4. Recip Comp includes Local and ISP, but not disputed VNXX									
5. Transit revenues are not included									
QC (RBOC) Composite Rates Per MOU									
Switched Access from Interexchange Carriers									
Interstate Originating									
Interstate Terminating									
Intrastate Originating									
Intrastate Terminating									
Interstate Originating + Terminating									
Intrastate Originating + Terminating									
Total Switched Access									
Notes:									
1. Composite Rates Per MOU are computed by dividing by Local Switching MOUs, but includes tandem expenses in the numerator, including Jointly Provided Switched Access (JPSA) expenses. This, in addition to the fact that JPSA traffic is predominantly terminating, results in the terminating composite rates being higher than the originating rates.									

Response to 4.h.i of FCC's November 13, 2009 Pl						
Qwest Inter-carrier Compensation Revenues and Expenses						
2009	NM	OR	SD	UT	WA	WY
QC (RBOC) Annual Revenues						
Switched Access from Interexchange Carriers						
INTERSTATE						
Originating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Terminating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
INTRASTATE						
Originating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Terminating						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
TOTAL O+T						
Usage (MOU Related Charges)						
Dedicated (DTT and Dedicated Trunk Ports)						
MOUs - Local Switching (End Office)						
MOUs - Tandem Switching (includes JPSA)						
Switched Access Rates Applied When Other LEC						
Terminating						
Usage (MOU Related Charges)						
MOUs						
Reciprocal Compensation						
CLEC						
Local Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Wireless						
IntraMTA Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
QC (RBOC) Annual Expenses						
INTRASTATE Switched Access Rates Applied By						
Originating						
Usage (MOU Related Charges)						
MOUs						
Terminating						
Usage (MOU Related Charges)						
MOUs						
Reciprocal Compensation						
CLEC						
Local Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Wireless						
IntraMTA Usage (MOU Related Charges)						
Dedicated (DTT)						
MOUs - Billable						
MOUs - Bill and Keep						
Notes:						
1. Entrance Facilities excluded						
2. Usage related ISUP SS7 Signaling excluded						
3. Switched Access includes Jointly Provided Switch						
4. Recip Comp includes Local and ISP, but not displ						
5. Transit revenues are not included						
QC (RBOC) Composite Rates Per MOU						
Switched Access from Interexchange Carriers						
Interstate Originating						
Interstate Terminating						
Intrastate Originating						
Intrastate Terminating						
Interstate Originating + Terminating						
Intrastate Originating + Terminating						
Total Switched Access						
Notes:						
1. Composite Rates Per MOU are computed by divic						
addition to the fact that JPSA traffic is predominant						

iii. Identify portion of total intercarrier compensation that is subject to dispute due to issues or concerns over the proper classification or jurisdiction of the traffic.

The current intercarrier compensation (ICC) system creates arbitrage incentives due to the various rate levels and rate structures that apply based on the type of carrier and the type of traffic. Qwest, like many other carriers, is embroiled in a multitude of disputes as a result of the arbitrage schemes of other carriers. Inherent in each of these problems is the fact that it is impossible to quantify with precision the exact dollar amount of dispute. As a result of certain disputes arising out of these problems, Qwest has historical measurements of parts of each of three dispute areas that easily exceed a combined *****BEGIN CONFIDENTIAL***** *****END CONFIDENTIAL*****. Again, this measures just a fraction of the magnitude of just these three particular problems and does not include other problems such as access stimulation that ICC reform should address. But, it demonstrates unequivocally that these problems are significant. These three examples are:

IP voice traffic on the PSTN: Disparities in views in the industry about how IP voice traffic should be handled has led to controversy, disputes, and a lack of clarity as to how IP voice traffic should be defined and what rates should be applied. Qwest has urged the FCC to clarify the law with regard to IP voice traffic and stated its position as to the correct approach.¹ Qwest has also supported the application of access charges as an interim measure, to treat all traffic consistently, until the full intercarrier compensation docket can be concluded.² IP voice traffic is growing, and with the implementation of the National Broadband Plan it can only be expected to grow further. Identifying traffic as IP voice traffic is difficult, as there is no technical distinction or industry-recognized, unique SS7 indicator or message that signifies a call as IP voice. Qwest has developed various methods to estimate IP voice traffic, some through negotiation with customers to self-report. But, traffic identification problems and improper IP voice traffic routing by carriers continues.

VNXX: This traffic is interexchange, based on the originating and terminating points of the call, but the dialed digits suggest that the call is local due to assignment of an NXX local to the calling party rather than the called party. Qwest has sought clarification from the Commission that reciprocal compensation does not apply to VNXX calls.³

Other phantom traffic: It is difficult to estimate the full extent of other phantom or unidentified traffic problems, as the very nature of the traffic makes it difficult to identify and thus quantify. Qwest has supported USTelecom's proposed signaling rules to aid in the minimization of such traffic.⁴ Qwest also continuously monitors its network searching for various forms of inappropriate routing that could be labeled as phantom traffic. This includes, by way of example, switched access calls that are terminated either inappropriately through interconnection trunking or with a modified jurisdiction.

As another example of the magnitude of the overall problem, Qwest had been told by a single carrier that the monies Qwest owes to that carrier alone because of Qwest's refusal to pay what it believes are improper reciprocal compensation charges on VNXX traffic amount to over *****BEGIN CONFIDENTIAL***** *****END CONFIDENTIAL***** over the last six years.

¹ See Comments of Qwest Communications International Inc., WC Docket No. 05-337, et al., filed Nov. 26,