



February 22, 2012

VIA HAND DELIVERY

Ms. Ann Cole
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

RE: Docket No. 090538-TP - Amended Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (D/B/A VERIZON ACCESS TRANSMISSION SERVICES) et. al.; **CLAIM OF CONFIDENTIALITY**

Dear Ms. Cole:

Enclosed for filing on behalf of Qwest Communications Company, LLC, d/b/a CenturyLink QCC in the above-referenced docket, is the original of the confidential documents listed below. QCC claims that the information listed below in this filing is proprietary confidential business information in accordance with Section 364.183(1), Florida Statutes.

The information for which confidentiality is being claimed is:

- 1) **QCC Supplemental Responses to PAETEC Interrogatory Nos. 1-3 and 2-15 (highlighted portions)**
- 2) **QCC Supplemental Responses to PAETEC Document Requests Nos. 1-4 and 2-18 (highlighted portions)**
- 3) **QCC Supplemental Responses to PAETEC Document Requests Nos. 2-18 (Entire CD)**

This Notice requires that the information be treated as confidential while on file at the Florida Public Service Commission and further that the information be returned as required by Section 364.183, F.S.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer. Thank you for your assistance in this matter.

COM
 APA
 ECR
 GCL
 RAD
 SRC
 ADM
 OPC
 CLK

_____ Sincerely,
 _____ Susan S. Masterton
 _____ Enclosure
 _____ cc: Parties of Record

Susan S. Masterton
Susan S. Masterton

Susan S. Masterton
Senior Corporate Counsel
315 S. Calhoun Street, Suite 500
Tallahassee, FL 32301
850-599-1560 (voice)
850-224-0794 (fax)
susan.masterton@centurylink.com

DOCUMENT NUMBER - DATE

01013 FEB 22 2012

FPSC-COMMISSION CLERK

INTERROGATORIES

PAETEC Int. 2-15:

Did Qwest submit any dispute or otherwise complain about the rates or any invoiced charges for switched access services (whether for intrastate or interstate) that PAETEC billed Qwest during the period of time Qwest seeks "reparations, with applicable interest"? If the response is anything other than an unqualified no, please provide all details about each such dispute or complaint, including but not limited to, describing the difference between the amount paid by Qwest and the amount billed by PAETEC, the basis of the dispute, and how the dispute was resolved or whether the dispute remains pending.

INITIAL RESPONSE: QCC objects to this Request on the basis that it is overly broad, unduly burdensome and seeks information already in PAETEC's possession or custody. QCC further objects on the basis that the Request is not reasonably calculated to lead to the discovery of admissible evidence. As the provider subject to a statutory non-discrimination obligation, PAETEC had the obligation to provide identical rate treatment to QCC for the identical service given that QCC is similarly situated to AT&T and Sprint in the context of this service. As an IXC, QCC is provided switched access by over 700 CLECs nationwide. Even setting aside that PAETEC kept its switched access discount agreement secret, it was not QCC's responsibility to police the conduct of 700+ different CLECs or to lodge billing disputes in order to obtain non-discriminatory treatment. Without waiver of its objections, QCC responds as follows.

The responsive information is confidential and will be provided when a non-disclosure agreement or protective order is entered.

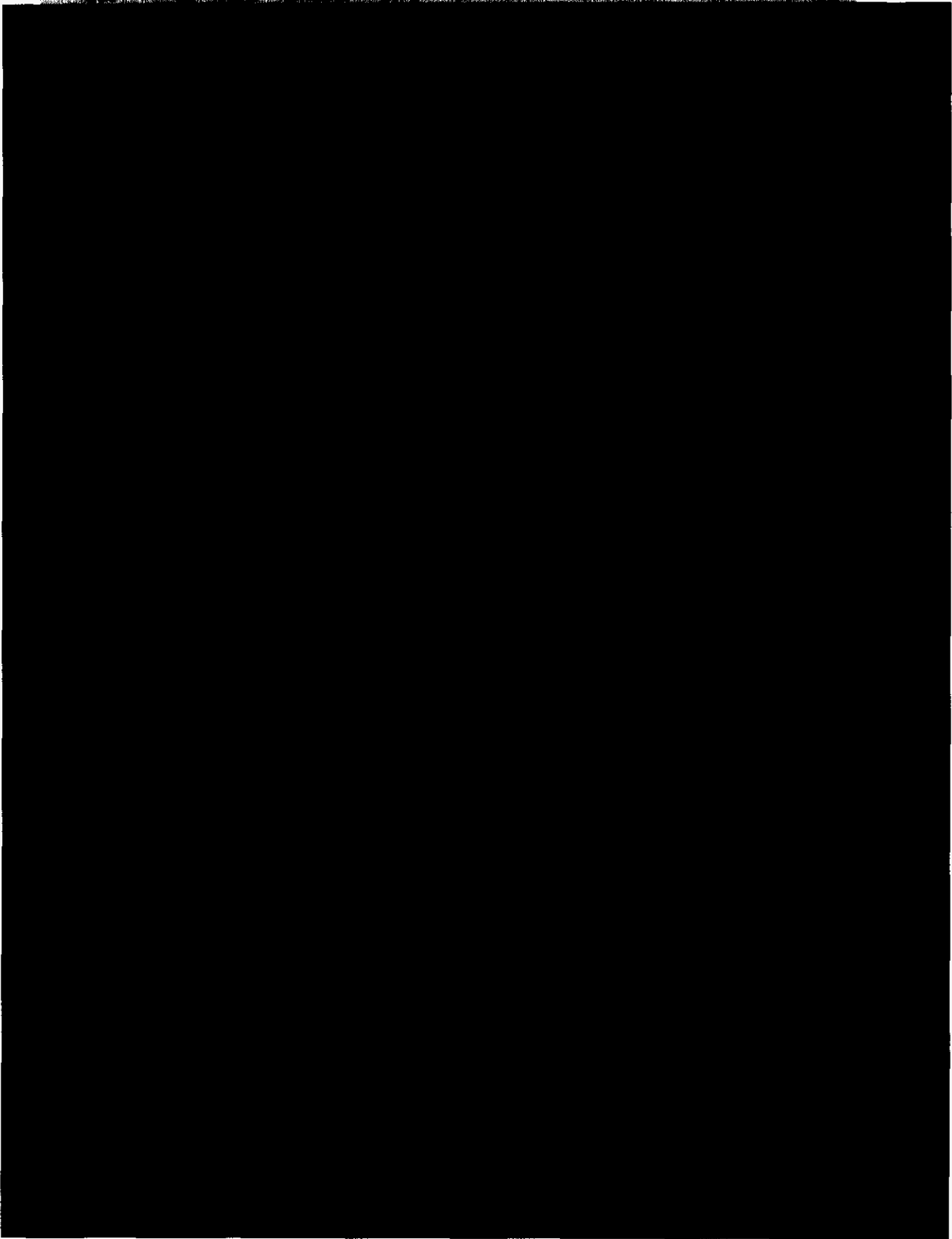
SUPPLEMENTAL RESPONSE: Without waiver of its objections, QCC responds as follows.

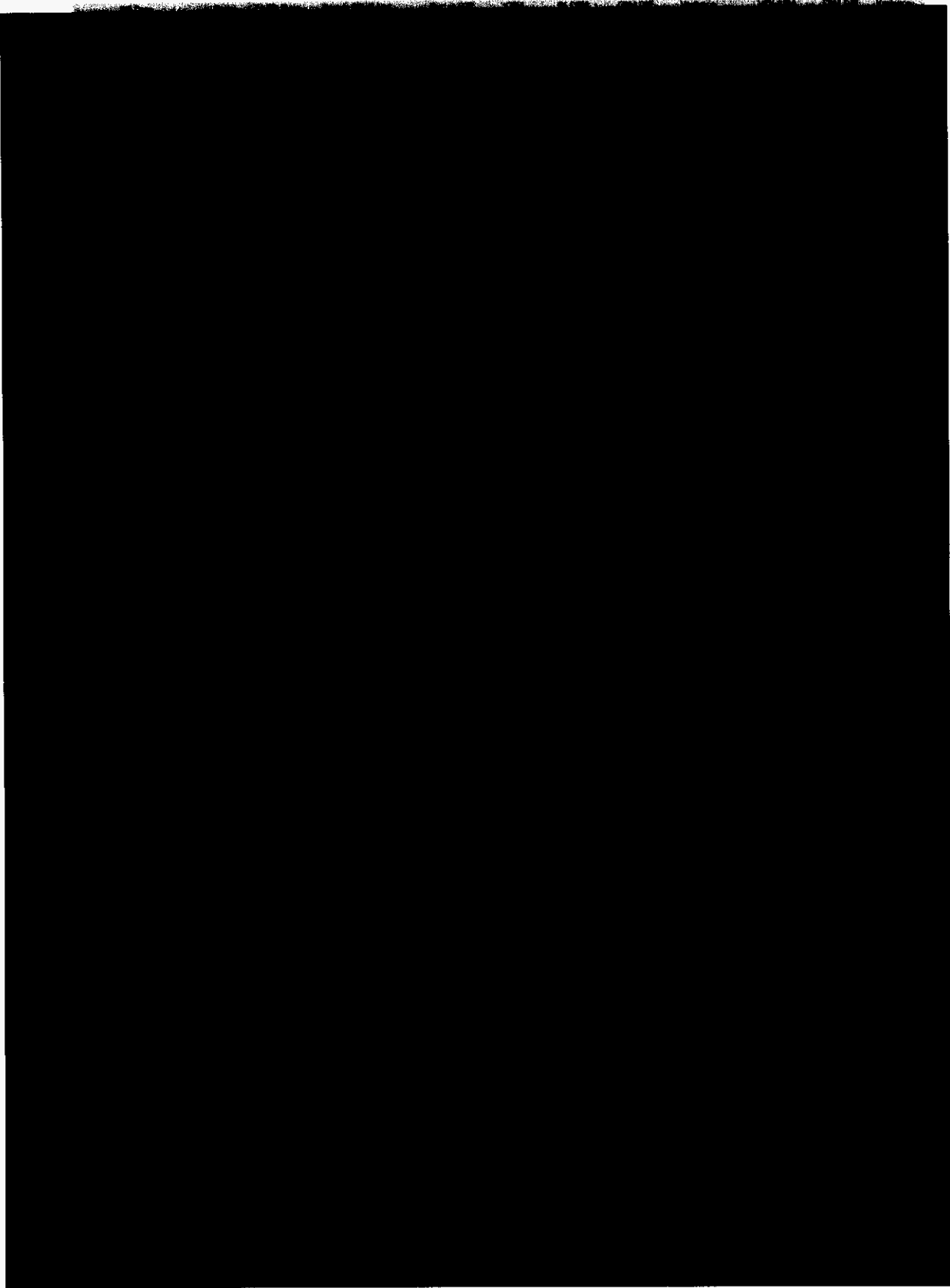


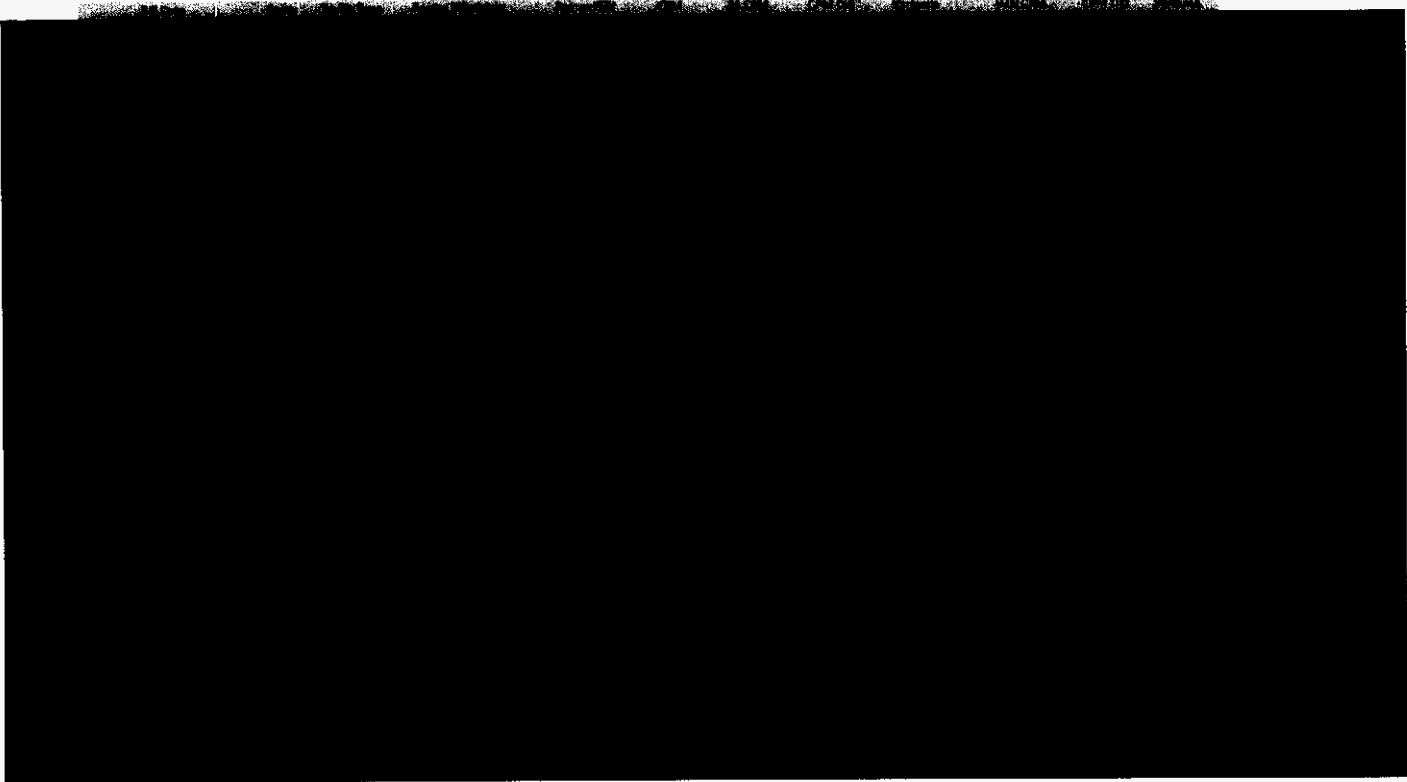
Respondents: QCC Legal;

Patrick Welch, QCC Manager Facility Cost
1801 California Street, 6th Floor
Denver, CO 80202

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Summary of QCC-PAETEC Billing Disputes (FL Intrastate Switched Access 2007-2011)

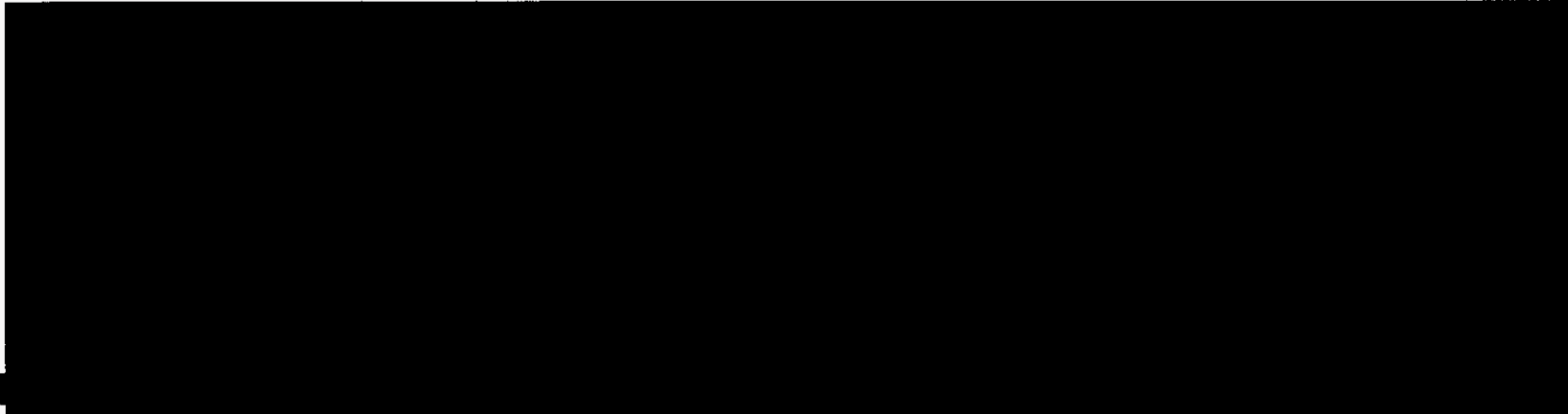
Docket No#090538-TP

QCC Response to PAETEC POD#2-18

CONFIDENTIAL DOCUMENT

QCC POD 001697

Vendor Name	BAN	Claim Number	Dispute Notes	Year Created	Date Created
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**QCC RESPONSE TO
PAETEC POD#2-18**

**QCC RESPONSE TO US
LEC POD#2-9**

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