

DISTRICT ATTORNEY

07 DEC 24 AM 10:33

Qwest Legal Department
1801 California St.
10th Floor
Denver, CO 80202



Stacy Hanson
Staff Paralegal/Interrogatory Manager
303-383-6678
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RECEIVED-FPSC
07 DEC 24 PM 12:26
COMMISSION CLERK

December 20, 2007

Via Overnight Delivery

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

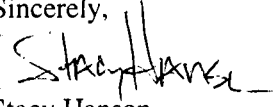
RE: Docket No.070560-TI Compliance Investigation of Virtual Reach Corporation for apparent violation of Rules 25-470, F.A.C., Registration Required, and 25-22.032(6)(b), F.A.C., Customer Complaints.

Qwest's Notice of Intent to Request Specified Confidential Classification

Dear Ms. Cole:

Enclosed is Qwest Communications Corporation's Notice of Intent to Request Specified Confidential Classification for its Response to Subpoena from the Florida Public Service Commission dated November 26, 2007, which we ask that you file in the captioned docket. The Confidential Response is provided in a sealed envelope marked "Confidential" with this filing.

If you have any questions regarding this serving, I can be reached at (303) 383-6678.

- CMP Sincerely,
- COM 
- CTR Stacy Hanson
- ECR Interrogatory Manager
- GCL enclosure
- OPC cc: Adam Sherr (w/ attachments)
- RCA
- SCR
- SGA
- SEC
- OTH conf records

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 11201-07. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER-DATE
11200 DEC 24 5
FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

In re: Docket No. 070560-TI - Compliance)
investigation of Virtual Reach Corporation)
for apparent violation of Rules 25-470, F.A.C.,)
Registration Required, and 25-22.032(6)(b),)
F.A.C., Customer Complaints)

Filed: December 21, 2007

**QWEST COMMUNICATIONS CORPORATION'S NOTICE OF INTENT TO
REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

Pursuant to Commission Rule 25-22.006, Florida Administrative Code, Qwest Communications Corporation (hereinafter "QCC" or "Qwest"), files its Notice of Intent to Request Specified Confidential Classification with the Florida Public Service Commission ("Commission") for information filed in response to a subpoena from the Commission dated November 29, 2007 ("Subpoena"). In support of this Notice, QCC respectfully states as follows:

1. On December 21, 2007, QCC filed its Response to the Commission's November 29, 2007, Subpoena in the above referenced docket.
2. QCC's response to the Subpoena contains information to be considered confidential business information. QCC is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of this material without delay.
3. The original of this Notice has been filed with the Office of the Commission Clerk. An unredacted copy of the confidential information is attached to the original of this Notice in a sealed envelope. A copy of the Subpoena is attached to this Notice as Exhibit A.


DOCUMENT NUMBER-DATE

11200 DEC 24 5

FPSC-COMMISSION CLERK

DATED this 20th day of December 2007.

Respectfully submitted,

By:  _____

Adam L. Sherr, Esq.
Corporate Counsel
Qwest
1600 7th Avenue, Room 3206
Seattle, WA 98191
Phone: 206-398-2507
Fax: 206-343-4040
Email: adam.sherr@qwest.com

Attorneys for Qwest Communications Corporation

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

EXHIBIT A

IN RE: Docket No. 070560-T1 - Compliance investigation of Virtual Reach Corporation for apparent violation of Rules 25-470, F.A.C., Registration Required, and 25-22.032(6)(b), F.A.C., Customer Complaints.

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

DATE: 11-29-07 TIME: 1:30

THE STATE OF FLORIDA

Eric Deal
ERIC DEAL

S.P.S. #336

TO: Qwest Communications Corporation c/o CT Corporation System 1200 S. Pine Island Road, Plantation, Florida 33324

YOU ARE COMMANDED to appear at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, within 30 days from issuance of this subpoena, or at such other time and place as may be mutually agreed upon by counsel, and to have with you at that time and place the following:

All information and documents set forth in the Attachment

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

YOU ARE SUBPOENAED by the following attorney to (1) appear as specified, or (2) furnish the records instead of appearing as provided above, and, unless excused from this subpoena by this attorney or the Commission, you shall respond to this subpoena as directed.

DATED November 26, 2007.

Ann Cole

Ann Cole, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission

(SEAL)

Charlene C. Poblete
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Attorney for Florida Public Service Commission

DOCUMENT NUMBER-DATE
11200 DEC 24 06
FPSC-COMMISSION CLERK

Attachment

Subpoena Duces Tecum to Qwest Communications Corporation
11/26/2007

For the following questions, please provide information regarding Qwest's business relationship with the companies listed below:

- i. ACCXX
- ii. Virtual Reach

1. Has Qwest provided wholesale network long distance services?
2. The dates such services were provided, including beginning and ending dates if there were gaps in the provision of service?
3. Has Qwest provided other types of services and if so, please identify?
4. The dates such services were provided, including beginning and ending dates if there were gaps in the provision of service?
5. Does Qwest continue to provide wholesale services?
6. How many customers are or were being served in Florida by Qwest as the underlying carrier?
7. A copy of the contract between Qwest and said companies, including copies of amendments, modifications, renewals and any other documents related to the contract agreement?
8. The method of payment used to pay Qwest for the contracted services?
9. If the services were paid for via check, please provide
 - (1) the company name on the header of the check (located on the top left corner of the check); and
 - (2) the name of the person that signed the check (located on the signature line)(If several checks were issued with varying information, please identify the dominant names, company and person only.)
10. Does Qwest bill on behalf of said companies and if so, the provider's name appearing on the bills sent to customers?
11. If Qwest does **not** bill on behalf of said companies, does Qwest send call detail records to a billing clearinghouse? Please provide
 - (1) which provider's name the billing clearinghouse places on the bill to customers; and
 - (2) the names of at least three of the billing clearing houses

Attachment

Subpoena Duces Tecum to Qwest Communications Corporation
11/26/2007

12. The names and contact information of all persons who have done business with Qwest on behalf of said companies?
13. Any additional information that may assist the Florida Public Service Commission in understanding the relationships between Qwest, ACCXX and Virtual Reach Corporation, along with an explanation of what the data represents?

Note: Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Qwest may submit a Request for Confidential Classification for certain qualifying documentation that may be provided in response to this Subpoena.

STATE OF FLORIDA

COMMISSIONERS:
LISA POLAK EDGAR, CHAIRMAN
MATTHEW M. CARTER II
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

CONFIDENTIAL

Public Service Commission

ACKNOWLEDGEMENT

DATE: December 24, 2007

TO: Stacy Hanson/Qwest Communications

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 070560 or, if filed in an undocketed matter, concerning Response to subpoena from Commission dated 11/26/07[hard copy and CD], and filed on behalf of Qwest Communications. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

DOCUMENT NUMBER-DATE
11201 DEC 24 2007
COMMISSION CLERK

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850
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PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us