

REDACTED

MCImetro Interrogatory No. 26:

The spreadsheet attached to QCC's Supplemental Response to MCImetro Interrogatory No. 17 contains a column titled "Usage Billed Amt." Did QCC pay MCImetro each of the amounts shown in that column? If your response is other than an unqualified "yes,"

- a) please identify each amount shown in that column that QCC did not pay;
- b) explain why QCC did not pay each amount that QCC identified in its response to subparagraph (a) above; and
- c) state what amount (if any) QCC paid instead.

RESPONSE: QCC objects to this Interrogatory on the basis that it seeks information already in MCI's possession or control. Without waiver of its objections, QCC responds as follows.

[BEGIN CONFIDENTIAL]

[REDACTED]

[END]

CONFIDENTIAL]

Respondent: Julie Tammen
TEOCO Corporation
10955 Lowell, Ste 705
Overland Park, KS 66210

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APA _____
ECR _____
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RAD _____
SRC _____
ADM _____
OPC _____
CLK _____

REDACTED

DOCUMENT NUMBER DATE
03121 MAY 16 02
FPSC-COMMISSION CLERK

MCImetro Interrogatory No. 29:

Please provide the number of local exchange customers and subscriber lines that QCC had in Florida as of December 31, 2003; December 31, 2004; December 31, 2005; and December 31, 2006.

RESPONSE: QCC objects to this Interrogatory on the basis that is not reasonably calculated to lead to the discovery of admissible evidence. As an IXC, similarly situated to AT&T with regard to MCI's provision of intrastate switched access in Florida, QCC was entitled to non-discriminatory rate treatment for that service. The total number of local exchange customers and subscriber lines are not explicit or implicit prerequisites for obtaining non-discriminatory rate treatment. Without waiver of its objections, QCC responds as follows.

[BEGIN CONFIDENTIAL]



[END CONFIDENTIAL]

Respondents: QCC Legal;

Marsha Dodd, QCC Provisioning Supervisor
4650 Lakehurst Ct.
Dublin, Ohio 43016-3252

REDACTED

MCImetro Interrogatory No. 30:

Please provide the number of customers to QCC's long distance services in Florida as of December 31, 2003; December 31, 2004; December 31, 2005; and December 31, 2006.

RESPONSE: QCC objects to this Interrogatory on the basis that is not reasonably calculated to lead to the discovery of admissible evidence. As an IXC, similarly situated to AT&T with regard to MCI's provision of intrastate switched access in Florida, QCC was entitled to non-discriminatory rate treatment for that service. The total number of long distance customers is not an explicit or implicit prerequisite for obtaining non-discriminatory rate treatment. Without waiver of its objections, QCC responds as follows.

[BEGIN CONFIDENTIAL]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[END CONFIDENTIAL]

Respondents: QCC Legal;

Fran Bendever, Senior Analyst, Regulatory Finance
1801 California Street, 6th Floor
Denver, CO 80202

REDACTED

QWEST COMMUNICATIONS COMPANY, LLC'S RESPONSE TO MCIMETRO ACCESS TRANSMISSION SERVICES, LLC D/B/A VERIZON ACCESS TRANSMISSION SERVICES' SECOND SET OF INTERROGATORIES (NOS. 24-34) AND DOCUMENT REQUESTS (NOS. 6-10)
DOCKET NO. 090538-TP
PAGE 13

MCImetro Interrogatory No. 33:

Explain why any harm or detriment that QCC incurred because of the 2004 Contracts between MCI and AT&T has not been reduced or mitigated by any settlement agreement between QCC and AT&T that resulted in dismissal or withdrawal of QCC's complaint against AT&T Inc. that QCC filed in Minnesota state court in January 2007, Case No. 27 CV 08-2014.

RESPONSE: QCC objects to this Request on the basis that it is vague, ambiguous and calls for a legal conclusion. Without waiver of its objections, QCC responds as follows.

[BEGIN CONFIDENTIAL]



[END CONFIDENTIAL]

Respondent: QCC Legal

REDACTED

QCC Response to MCI/Verizon POD #7

Billing Dispute Documents

(QCC Bates Stamp#002911-#002917)

****REDACTED****

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FPSC-COMMISSION CLERK

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[REDACTED]

[END CONFIDENTIAL]

IX. REVIEW OF MCI DISCOVERY RESPONSE

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Q. HAVE YOU REVIEWED MCI'S RESPONSE TO QCC'S THIRD SET OF DATA REQUESTS?

A. Yes. In discovery, QCC asked MCI for documents relating to the original negotiation of the "reciprocal" agreements in 2004 (including external communications between MCI and AT&T and internal MCI analyses regarding the financial impact) and relating to the one year extension (agreed to in 2006) that extended the agreement until January 2007. [BEGIN HIGHLY

CONFIDENTIAL [REDACTED]

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[REDACTED]

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DOCUMENT NUMBER-DATE

QCC POD 002907 03121 MAY 16 2

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[REDACTED]

[REDACTED] **END HIGHLY**

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Q. WHAT OBSERVATIONS DID YOU MAKE?

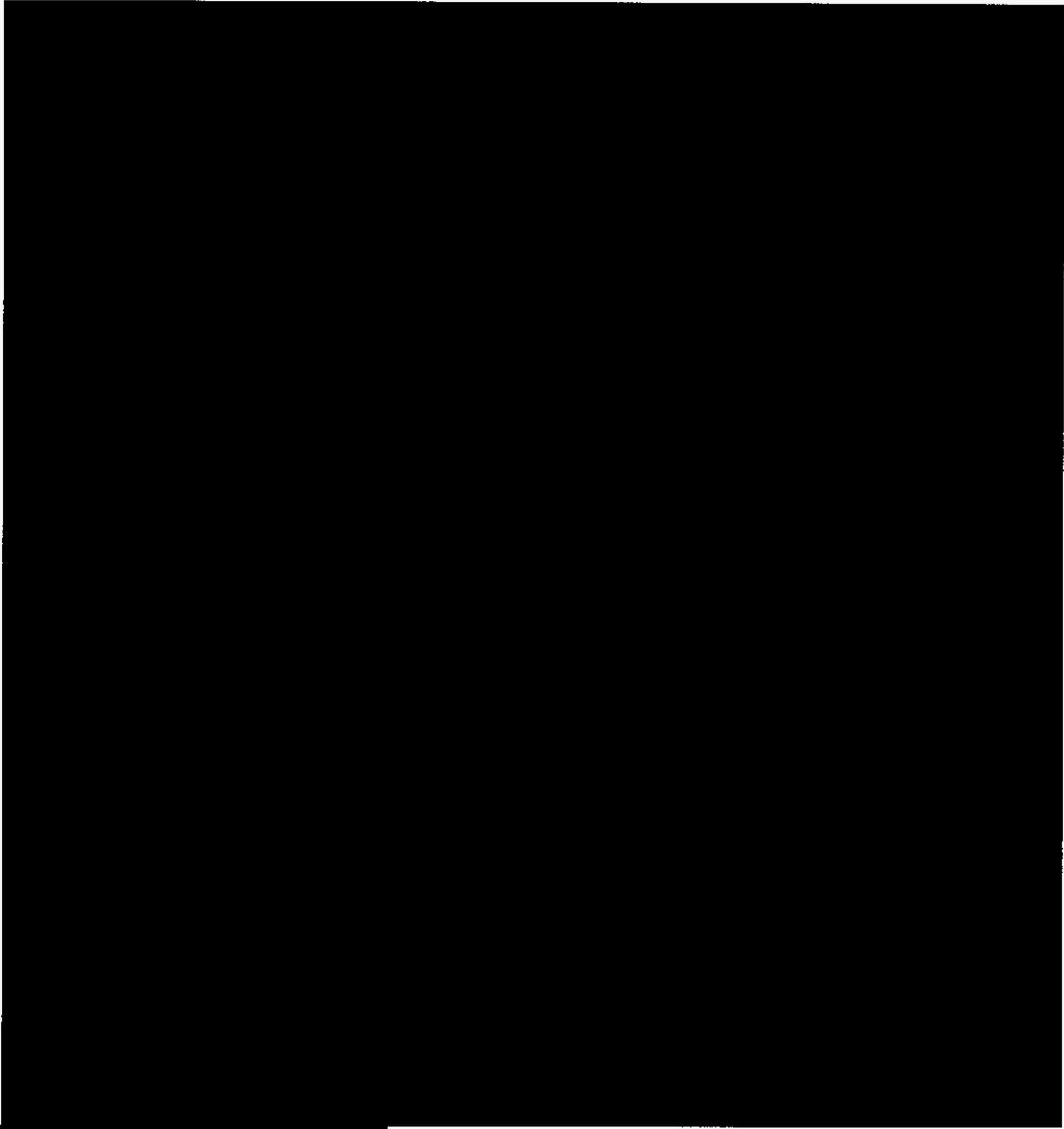
A. [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

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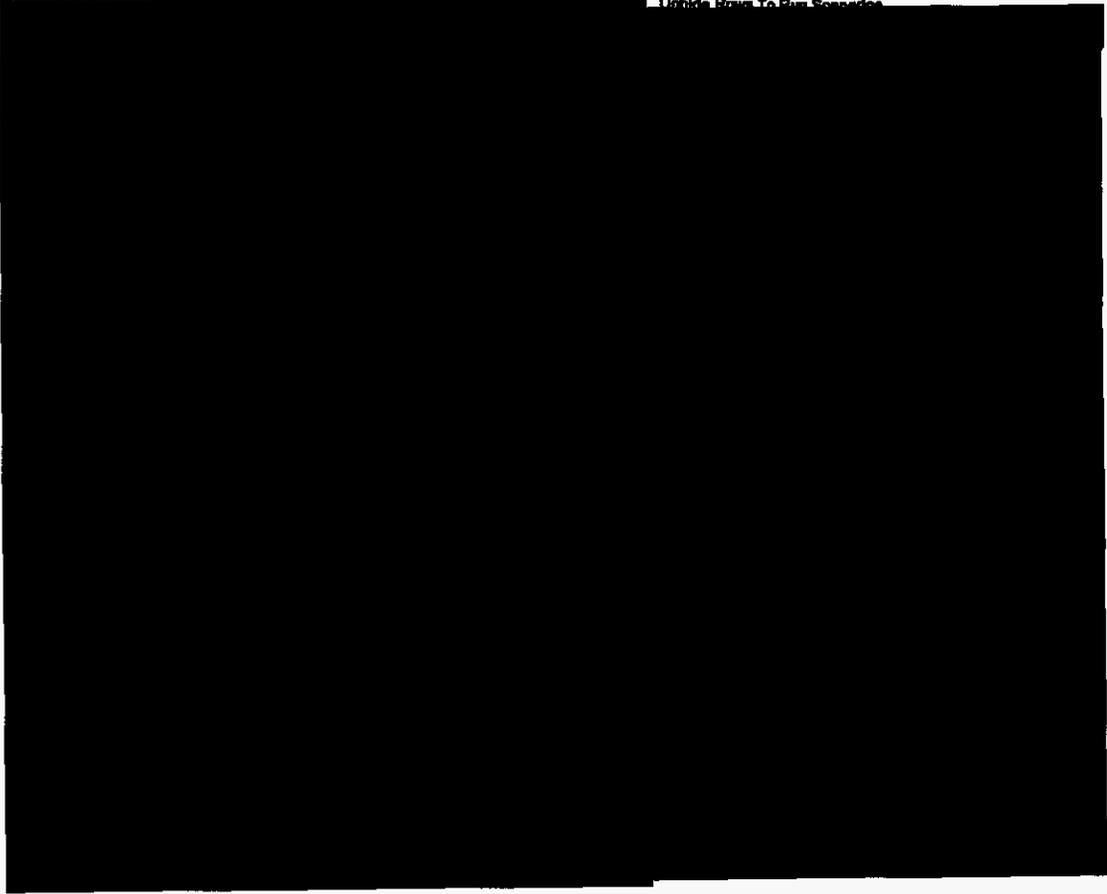
[END HIGHLY CONFIDENTIAL]

**Q. BASED ON THE UPDATES IN THIS REBUTTAL TESTIMONY, HAVE
YOU UPDATED YOUR FINANCIAL SUMMARY FOUND AT PAGE 47 OF
YOUR DIRECT TESTIMONY?**

PRIVILEGED AND CONFIDENTIAL

Highly Confidential Exhibit DAC-20
Rebuttal Testimony of Derek Canfield
Qwest Communications Company
Docket No. 08F-259T
October 13, 2009
Page 1

ATT / MCI Prospective Switched Access Settlement Analysis
Thursday, January 29, 2004 8:20PM Additional Data in Hidden Rows and Columns
Uphide Rows To Run Scenarios



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QCC POD 002910