

**Qwest**  
421 Southwest Oak Street  
Suite 810  
Portland, Oregon 97204  
Telephone: 503-242-5420  
Facsimile: 503-242-8589  
e-mail: carla.butler@qwest.com

**Carla M. Butler**  
Lead Paralegal



March 16, 2009

**VIA E-MAIL and UPS NEXT DAY DELIVERY**

William Evans  
Parsons Behle & Latimer  
201 South Main Street  
Suite 1800  
Salt Lake City, UT 84111

RE: Utah PSC Docket No. 08-2430-01  
Verizon Business' First Set of Data Requests

Dear Mr. Evans:

Enclosed please find Qwest Corporation's responses to Verizon Business' First Set of Data Requests, Nos. 1.1 through 1.18.

If you have any questions regarding this serving, please contact me at (503) 242-5420.

Sincerely,

A handwritten signature in cursive script that reads "Carla".

Carla M. Butler

Enclosures  
cc: Alex Duarte, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of March, 2009, I served a true and correct copy of the foregoing Responses to Verizon Business' First Set of Data Requests via e-mail transmission, and UPS Next Day Delivery, on the following person, addressed to him at his regular office address shown below, and to his e-mail address also listed below:

William Evans  
Parsons Behle & Latimer  
201 South Main Street  
Suite 1800  
Salt Lake City, UT 84111  
[wevans@parsonsbehle.com](mailto:wevans@parsonsbehle.com)

*Attorneys for Verizon Business Services*

DATED this 16<sup>th</sup> day of March, 2009.

**QWEST CORPORATION**



By: \_\_\_\_\_

ALEX M. DUARTE, No. 30836  
421 SW Oak Street, Suite 810  
Portland, OR 97204  
Telephone: 503-242-5623  
Facsimile: 503-242-8589  
e-mail: [alex.duarte@qwest.com](mailto:alex.duarte@qwest.com)  
Attorney for Qwest Corporation

Utah  
Docket No. 08-2430-01  
Verizon 01-001

INTERVENOR: Verizon Business Services

REQUEST NO: 001

Does Qwest intend to identify on its CABS bills the amount of traffic that it finds lacks sufficient information to enable it to determine jurisdiction?

a) If the answer is no, please explain how Qwest intends to communicate to an interexchange carrier (IXC) or other access customer how it determined the amount of traffic to which it applied the floor, and what the amount of such traffic was?

RESPONSE:

Yes.

Respondent: Marianne Spencer

Utah  
Docket No. 08-2430-01  
Verizon 01-002

INTERVENOR: Verizon Business Services

REQUEST NO: 002

In section 2.3.10 A of its proposed tariff, Qwest states that it will apply the new floor when "terminating traffic without sufficient call detail to determine jurisdiction" exceeds a certain percentage. What call detail does Qwest consider "sufficient" to determine jurisdiction?

RESPONSE:

Qwest proposes adding the following additional language to section 2.3.10.A of our tariff filing to provide additional clarification:

To determine the jurisdiction of a call, the Company compares the originating number information with the terminating number information. Traffic without sufficient call detail shall be that traffic for which the originating number information lacks a valid Charge Party Number (ChPN) or Calling Party Number (CPN).

Respondent: Mark Holling

Utah  
Docket No. 08-2430-01  
Verizon 01-003

INTERVENOR: Verizon Business Services

REQUEST NO: 003

On page 7 of Qwest's comments filed on February 26, 2009, it states that: "If the originating number information lacks a valid Charge Number (CN) or Calling Party Number (CPN), Qwest terms the jurisdiction as unidentified." Please state what "valid" means. Please state what "lacks" means.

- a) Is a CPN considered valid as long as the field is not blank?
- b) If any number is included, is it valid?
- c) Are only certain numbers valid?
- d) For domestic calls, if a CPN has fewer than ten digits is it valid?
- e) For domestic calls, if a CPN has more than ten digits is it valid?
- f) How does Qwest determine whether a CN or CPN is valid?

What criteria does Qwest use to determine whether the originating number information on a call lacks sufficient information to enable it to determine whether the CN or CPN is valid?

RESPONSE:

Qwest's UTAH ACCESS SERVICE TARIFF, 6.3.1.Q provides a definition of valid CN and CPN. A portion is reproduced below.

- Calling Party Number (CPN) is the automatic transmission of the calling party's ten digit telephone number to the customer's premises for calls originating in the LATA. The ten digit number consists of the Numbering Plan Area (NPA) plus the seven digit telephone number.

- Charge Number is the SS7 Out of Band Signaling equivalent of the ten-digit ANI telephone number.

- a) No.
- b) No.
- c) Yes.
- d) No.
- e) No.
- f) See Qwest's Response to Request 1.3.
- g) See Qwest's Response to Request 1.4.

Respondent: Mark Holling

Utah  
Docket No. 08-2430-01  
Verizon 01-004

INTERVENOR: Verizon Business Services

REQUEST NO: 004

Please provide the business rules which describe the process and sequence of steps that Qwest goes through to review CN and CPN information, determine whether the information is valid, and determine whether the information is sufficient to determine jurisdiction of the call.

RESPONSE:

Qwest responds that generally call records are created by Qwest for calls that terminate to a Qwest network on Feature Group D trunking.

The jurisdiction of each call is determined within Pre-Processing 42 (PP42). The method used to determine jurisdiction is a multi-step process involving comparison of originating and terminating NPA/NXX. PP42 validates that the Charge Number (CN) or Calling Party Number (CPN) exists. A valid NPA NXX obtained from the CN or CPN is then used to do a table look up retrieve the EAS code and LATA code for that NPA NXX. Then the called party NPA NXX is used to do another table look-up to retrieve the EAS code and LATA code.

The EAS code and LATA code values found are then used to determine if the jurisdiction would be considered for one of the following:

- unable to identify
- interstate
- intrastate
- intrastate/intraLATA

If the CN or CPN would have a value of 0's for the NPA NXX, then the table look-up would not be performed and the jurisdiction unable to identify.

If the CN or CPN NPA NXX is not found in the table look up, the jurisdiction of unable to identify would be applied.

Respondent: Marie Eggers

Utah  
Docket No. 08-2430-01  
Verizon 01-005

INTERVENOR: Verizon Business Services

REQUEST NO: 005

Referring to the business rules referenced in data request 1.4, if Qwest initially determines that a valid CN has been provided, but subsequently determines that the information is insufficient to determine jurisdiction, will it then review CPN information to determine the jurisdiction of the call?

RESPONSE:

No. Qwest's standard business rules/process does not include subsequent analysis to determine that the information (i.e., CPN or CN) is insufficient to determine jurisdiction.

Respondent: Tom Buhler

Utah  
Docket No. 08-2430-01  
Verizon 01-006

INTERVENOR: Verizon Business Services

REQUEST NO: 006

Referring to the business rules referenced in data request 1.4, if Qwest initially determines that a valid CPN has been provided, but subsequently determines that the information is insufficient to determine jurisdiction, will it then review CN information to determine the jurisdiction of the call?

RESPONSE:

No. Qwest's standard business rules/process does not include subsequent analysis to determine that the information (i.e., CPN or CN) is insufficient to determine jurisdiction.

Respondent: Tom Buhler

Utah  
Docket No. 08-2430-01  
Verizon 01-007

INTERVENOR: Verizon Business Services

REQUEST NO: 007

Qwest has stated that it will look at "Charge Number" or "Charge Party Number" to determine jurisdiction. Does Qwest receive this information on international calls that Qwest terminates?

- a) If the answer is yes, does Qwest receive this information on the majority of international calls that Qwest terminates?
- b) If the answer is yes, does Qwest use this information to determine the call's jurisdiction?

RESPONSE:

Yes.

(a) Valid NPA NXX traffic that is international is billed as interstate and is indistinguishable from interstate domestic traffic. Within Qwest's processes, it is impossible to determine the percentage of international calls where the lack of Charge Number and Calling Party number prohibits determination of Domestic vs International calls.

(b) Valid NPA NXX traffic that is international is billed as interstate and is indistinguishable from interstate domestic traffic.

Respondent: Marie Eggers

Utah  
Docket No. 08-2430-01  
Verizon 01-008

INTERVENOR: Verizon Business Services

REQUEST NO: 008

What information does Qwest look at to determine whether a call originated internationally?

RESPONSE:

Qwest's processes include the evaluation of calling party information as described in the response to request number 4 to determine valid NPA NXX and the determination of Intrastate/Interstate. Traffic with valid NPA NXX that is international is billed as interstate and is indistinguishable from interstate domestic traffic.

Respondent: Marie Eggers

Utah  
Docket No. 08-2430-01  
Verizon 01-009

INTERVENOR: Verizon Business Services

REQUEST NO: 009

If an international call includes a "country code" followed by ten digits, does Qwest consider this valid and sufficient to determine the call's jurisdiction?

a) If the answer is no, explain why.

RESPONSE:

No.

Traffic with valid NPA NXX that is international is billed as interstate and is indistinguishable from interstate domestic traffic. See Qwest's Response to Request 1.3.

Respondent: Marie Eggers

Utah  
Docket No. 08-2430-01  
Verizon 01-010

INTERVENOR: Verizon Business Services

REQUEST NO: 010

If an international call includes a "country code" followed by more than ten digits, does Qwest consider this valid and sufficient to determine the call's jurisdiction?

a) If the answer is no, explain why.

RESPONSE:

Yes.

Traffic with valid NPA NXX that is international is billed as interstate and is indistinguishable from interstate domestic traffic. See Qwest's Response to Request 1.3.

Respondent: Marie Eggers

Utah  
Docket No. 08-2430-01  
Verizon 01-011

INTERVENOR: Verizon Business Services

REQUEST NO: 011

If an international call includes a "country code" followed by less than ten digits, does Qwest consider this valid and sufficient to determine the call's jurisdiction?

a) If the answer is no, explain why.

RESPONSE:

No.

Traffic with valid NPA NXX that is international is billed as interstate and is indistinguishable from interstate domestic traffic. See Qwest's Response to Request 1.3.

Respondent: Marie Eggers

Utah  
Docket No. 08-2430-01  
Verizon 01-012

INTERVENOR: Verizon Business Services

REQUEST NO: 012

If there is information in the SS7 data stream other than Calling Party Number that indicates a call was originated internationally, does Qwest consider this sufficient for determining the jurisdiction of the call?

a) If the answer is no, explain why.

RESPONSE:

No.

Qwest uses Switch AMA billing and there are no requirements to record any of the international indicators/parameters. See Qwest's Response to Request 1.3.

Respondent: Tom Buhler

Utah  
Docket No. 08-2430-01  
Verizon 01-013

INTERVENOR: Verizon Business Services

REQUEST NO: 013

Does Qwest look at the "Calling Number Nature of Address" indicator in the SS7 message, and whether the field is populated with information indicating that the call originated internationally, to determine whether sufficient information has been provided in order to determine the call's jurisdiction?

a) If the answer is no, explain why.

RESPONSE:

No.

Qwest uses Switch AMA billing protocol information and there are no requirements to record any of the international indicators/parameters - Calling Number Nature of Address. See Qwest's Response to Request 1.3

Respondent: Tom Buhler

Utah  
Docket No. 08-2430-01  
Verizon 01-014

INTERVENOR: Verizon Business Services

REQUEST NO: 014

Does Qwest look at the "Incoming International Call" indicator in the SS7 message, and whether the field is populated with information indicating that the call originated internationally, to determine whether sufficient information has been provided in order to determine the call's jurisdiction?

a) If the answer is no, explain why.

RESPONSE:

No.

Qwest uses Switch AMA billing protocol and there are no requirements to record any of the international indicators/parameters - Incoming International Call. See Qwest's Response to Request 1.3.

Respondent: Tom Buhler

Utah  
Docket No. 08-2430-01  
Verizon 01-015

INTERVENOR: Verizon Business Services

REQUEST NO: 015

If the originating Calling Party Number is a domestic toll-free number (i.e., 800 or other 8YY number), how does Qwest determine the jurisdiction of the call?

RESPONSE:

See Qwest's Response to Request 1.4.

Respondent: Marie Eggers

Utah  
Docket No. 08-2430-01  
Verizon 01-016

INTERVENOR: Verizon Business Services

REQUEST NO: 016

Qwest's website states that Qwest uses the "jurisdiction information parameter (JIP)" that appears in the call stream of wireless traffic to rate domestic-to-domestic cellular calls "based on the actual originating cell phone location (rather than on the ANI associated with the phone). See <http://www.qwest.com/wholesale/pcat/natjip.html>. Please explain why Qwest is not using the JIP to determine the jurisdiction of wireless-originated calls that it terminates and for which it would bill IXCs pursuant to its proposed tariff. Provide all documents that describe or relate to Qwest's decision not to use the JIP for this purpose.

RESPONSE:

The document quoted is located in Qwest's website associated with Qwest's National IXC operations and describes processes used by that side of Qwest's operations. These processes do not apply to the 14-state ILEC Local operations. There is a separate section in Qwest's website clearly marked Local that contains the product and process descriptions that are applicable to Qwest's Local operations.

JIP is not a mandatory parameter. The 7 rules of JIP were released March 2-3, 2005 by the TIA Committee TR-45 to bring NIIF Issue #208, Jurisdiction Information Parameter to a close. (See attached "7 rules of populating JIP.pdf".) Rule 3 states: "The NIIF does not recommend proposing that the JIP parameter be mandatory since calls missing any mandatory parameter will be aborted."

Qwest's ILEC operations performed a study in 2006 of traffic to analyze how many messages contained JIP. Of 203.7 million terminating messages, less than 1/10 of a percent contained JIP. Based on these results, Qwest did not change its current processes. (See attached Confidential study "Party Id Stats.xls".)

Respondent: Mike Marshall

Vancouver, BC, Canada  
March 2-3, 2005

UTAH  
DOCKET NO. 08-2430-01  
VERIZON SET 1, NO. 16  
ATTACHMENT " 2"  
TR45/05.03.02.31

**TIA COMMITTEE TR-45  
MOBILE & PERSONAL COMMUNICATIONS STANDARDS (TR-45)**

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**TITLE:** TR-45 Committee Correspondence  
Re: Status of NIIF Issue #208, JIP

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**SOURCE:** TR-45 Secretary  
  
Lucent Technologies  
1960 Lucent Lane  
Naperville, IL 60566  
  
Jane C. Brownley  
630-979-0615

---

**DATE:** March 2-3, 2005, Vancouver, BC, Canada

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**DISTRIBUTION TO:** Participants of Committee TR-45

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**ABSTRACT:** This document contains the following Committee correspondence:

- Correspondence from NIOC to TR-45 and others, Re: Status of NIIF Issue #208, JIP, February 2, 2005.

**Notices:**

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**From:** Blum, Cheryl J (Cheryl)

**Sent:** Wednesday, February 02, 2005 2:22 PM

**To:** David.Crowe@cnp-wireless.com; gary@commflowresources.com; Jacobson, Terry (Terry); Larry.A.Young@mail.sprint.com; robert.ephraim@verizonwireless.com

**Cc:** gerry.flynn@verizonwireless.com; Brownley, Jane C (Jane)

**Subject:** FW: status of NIIF Issue #208, Jurisdiction Information Parameter

Thanks to all of you for helping to finally bring this issue to closure in a manner that is acceptable to wireless community.

Thanks,  
Cheryl

-----Original Message-----

**From:** Karyn Sturgeon [mailto:ksturgeon@atis.org]

**Sent:** Wednesday, February 02, 2005 11:21 AM

**To:** cr1324@sbc.com; robert.jones@uscellular.com; stiffa01@sprintspectrum.com; gary.m.sacra@verizon.com; mark.young@t-mobile.com; bhall@tri.sbc.com; cjblum@lucent.com; lmessing@ctia.org; dean.grady@mci.com; malee@verisign.com; paula.jordan@t-mobile.com

**Cc:** ramling@telcordia.com; Rx2378@sbc.com; Maria Estefania; Karen Block

**Subject:** status of NIIF Issue #208, Jurisdiction Information Parameter

The NIIF has placed Issue #208, Jurisdiction Information Parameter, into final closure as of Friday 11-12-04. With the final closure of this issue the 7 Rules of JIP are in effect. The NIIF documentation was updated on the ATIS website as of Monday 11-15-04 to include the new rules.

This issue was resolved with cooperation of other industry groups (OBF, WNPO now LNPAWG, T1P1, T1S1, TR45, CTIA, SME's and others) who have agreed to the creation and text for 7 new JIP rules as attached. The NIIF/NIOC would like to express their appreciation to everyone who participated in this accomplishment.

If you wish to review the inclusion of the 7 rules of JIP within the NIIF documentation; the document conversion of Part III, Installation and Maintenance Responsibilities for SS7 Links and Trunks to the new ATIS Standard documentation format has been completed and posted to the NIIF Password Protected Documents web page as ATIS 03-00011 (formerly NIIF 5018), which can be accessed by employees of NIIF Member Companies at [http://www.atis.org/niif/\\_com/passwordprotectdocs.asp](http://www.atis.org/niif/_com/passwordprotectdocs.asp). Non-members may access this information via the ATIS document store at <http://www.atis.org/doccenter.shtml>.

#### Rules for Populating JIP

1. JIP should be populated in the IAMs of all wireline and wireless originating calls where technically feasible.
2. JIP should be populated with an NPA-NXX that is assigned in the LERG to the originating switch or MSC.
3. The NIIF does not recommend proposing that the JIP parameter be mandatory since calls missing any mandatory parameter will be aborted. However, the NIIF strongly recommends that the JIP be populated on all calls where technologically possible.
4. Where technically feasible if the originating switch or MSC serves multiple states/LATAs, then the switch should support multiple JIPs such that the JIP used for a given call can be populated with an NPA-NXX that is specific to both the switch as well as the state and LATA of the caller.

If the JIP cannot be populated at the state and LATA level, the JIP should be populated with an NPA-NXX specific to the originating switch or MSC where it is technically feasible.

5. Where the originating switch cannot signal JIP it is desirable that the subsequent switch in the call path populate the JIP using a data fill default associated with the incoming route. The value of the data fill item is an NPA-NXX associated with the originating switch or MSC and reflects its location.

6. When call forwarding occurs, the forwarded from DN (Directory Number) field will be populated, the JIP will be changed to a JIP associated with the forwarded from DN and the new called DN will be inserted in the IAM.
7. As per T1.TRQ2, the JIP should be reset when a new billable call leg is created.

If you have any questions related to this correspondence please contact:

Robert Amling  
NIOC Co Chair  
[ramling@telcordia.com](mailto:ramling@telcordia.com)

Robin Meier  
NIOC Co Chair  
[Rx2378@sbc.com](mailto:Rx2378@sbc.com)

Cc:  
[mestefania@atis.org](mailto:mestefania@atis.org)  
[kblock@atis.org](mailto:kblock@atis.org)

Utah  
Docket No. 08-2430-01  
Verizon 01-017

INTERVENOR: Verizon Business Services

REQUEST NO: 017

On page 5 of Qwest's comments filed on February 26, 2009, it states that it "conducted a study of traffic originated by our own end users which was then delivered to an IXC for termination...". Did that study only consider traffic that was Feature Group D-originated?

- a) Did the study include any traffic that was originated over dedicated access lines, instead of over Feature Group D?
- b) If the answer to subpart a is yes, what percentage of the traffic studied was not Feature Group-originated?
- c) Did the study only include traffic that was originated in the United States?
- d) Did the study include any traffic that was originated internationally?

RESPONSE:

Yes.

- a) No.
- b) Not Applicable.
- c) Yes.
- d) No.

Respondent: Mark Holling

Utah  
Docket No. 08-2430-01  
Verizon 01-018

INTERVENOR: Verizon Business Services

REQUEST NO: 018

During the discovery conference on March 3, 2009, Qwest provided a one-page spreadsheet that is not titled, but is labeled 'CONFIDENTIAL -- SUBJECT TO PROTECTIVE ORDER.' Please provide a similar spreadsheet and analysis that excludes information about Qwest and any of its IXC affiliates. To clarify, please provide a similar spreadsheet and analysis that contains information only about IXCs other than Qwest or its affiliates.

RESPONSE:

Qwest objects to this data request on the grounds that it calls for disclosure of information and data that would violate Section 222 of the Telecommunications Act of 1996 and the FCC's Customer Proprietary Network Information "CPNI" rules.

Respondent: Alex Duarte, Qwest Legal