QWEST COMMUNICATIONS COMPANY, LLC'S OBJECTIONS AND SUPPLEMENTAL RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES DOCKET NO. 090538-TP PAGE 3

REDACTED

INTERROGATORIES

19. Has QCC filed any billing disputes with any of the Respondent CLECs regarding the rates it has been billed for the provision of switched access service? If so, please provide the details of that dispute including: when it was filed, if it has been resolved, and how was it resolved.

INITIAL RESPONSE: In the normal course of business, QCC audits the invoices it receives from providers (including CLECs) of switched access service. QCC routinely submits billing disputes to rectify ordinary billing errors. QCC is billed for switched access by over 700 CLECs nationwide, plus many ILECs. In an average month in 2011, QCC has submitted 320 separate billing disputes regarding switched access provided to QCC on a nationwide basis. Because of this large volume, it is difficult to comprehensively catalog each ordinary billing dispute submitted to each CLEC respondent. With that understanding, QCC is working on compiling a summary of its ordinary, Florida-related billing disputes with the respondent CLECs over the past five years. QCC intends to supplement this response when such information is compiled.

Respondent: Patrick J. Welch, Manager of Finance-Facility Cost

1801 California Street, 6th Floor

Denver, CO 80202

BEGIN CONFIDENTIAL

SUPPLEMENTAL RESPONSE: QCC supplements its response as follows:

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M			END CONFIDENTIAL]
A	dents: Legal;		
R Respon	dents: Legal,		
AD	Patrick J. Welch,	Manager of Finance-Facility Cos	t .
RC	1801 California S		
DM	Denver, CO 80202	<u> </u>	DOMESTON TRANSPORT
PC			TO THE WEST MINDER DATE
LK		REDACTED	03036 MAY 11 ~