

**Qwest**  
1600 7th Avenue, Room 1506  
Seattle, Washington 98191  
(206) 345-1041  
Facsimile (206) 343-4040

**Maura E. Peterson**  
Paralegal  
Regulatory Law

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2011 MAY 20 AM 9: 14

IDAHO PUBLIC  
UTILITIES COMMISSION



*Via Overnight delivery*

May 19, 2011

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
P.O. Box 83720  
Boise, Idaho 83720-0074

Re: Case No. QWE-T-11-06  
Application for Approval of Agreement to Adopt the Neutral Tandem, Inc.  
Interconnection Agreement  
Broadvox-CLEC, LLC

Dear Ms. Jewell:

Enclosed for filing with this Commission on behalf of Qwest Corporation is an original and three (3) copies of the Application for Approval of Amendment to Adopt the Neutral Tandem, Inc. Interconnection Agreement. Qwest respectfully requests that this matter be placed on the Commission Decision Meeting Agenda for expedited approval.

Please contact me if you have any questions concerning the enclosed. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maura E. Peterson', is written over the typed name.

Maura E. Peterson

mep  
Enclosure  
cc: Service list

Lisa A. Anderl (WSBA# 13236)  
Qwest  
1600 7th Ave, Room 1506  
Seattle, WA 98191  
Telephone: (206) 398-2500  
Facsimile: (206) 343-4040  
lisa.anderl@qwest.com

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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**  
**APPLICATION OF QWEST**  
**CORPORATION FOR APPROVAL OF**  
**THE ADOPTION OF THE NEUTRAL**  
**TANDEM INTERCONNECTION**  
**AGREEMENT (APPROVED BY THE**  
**COMMISSION ON JUNE 22, 2010 IN**  
**DOCKET NO. QWE-T-10-02 FOR THE**  
**STATE OF IDAHO PURSUANT TO 47**  
**U.S.C. §252(e)**

CASE NO.: QWE-T-11-06

**APPLICATION FOR APPROVAL OF**  
**AGREEMENT TO ADOPT**  
**INTERCONNECTION AGREEMENT**

Qwest Corporation ("Qwest") hereby files this Application for Approval of Interconnection Agreement ("Agreement"). The Letter Agreement with Broadvox-CLEC, LLC ("Broadvox") is submitted herewith.

This Agreement was reached through voluntary negotiations without resort to mediation or arbitration and is submitted for approval pursuant to Section 252(e) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the "Act").

Section 252(e)(2) of the Act directs that a state Commission may reject an agreement reached through voluntary negotiations only if the Commission finds that: the agreement (or portion(s) thereof) discriminates against a telecommunications carrier not a party to this agreement; or the implementation of such an agreement (or portion) is not consistent with the public interest, convenience and necessity.

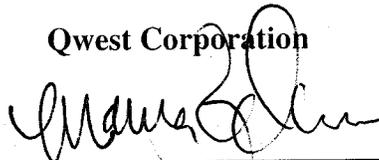
Qwest respectfully submits that this Agreement provides no basis for either of these findings, and, therefore requests that the Commission approve this Agreement expeditiously. This Agreement is consistent with the public interest as identified in the pro-competitive policies of the state of Idaho, the Commission, the United States Congress, and the Federal Communications Commission. Expeditious approval of this Agreement will enable Broadvox to

interconnect with Qwest facilities and to provide customers with increased choices among local telecommunications services.

Qwest further requests that the Commission approve this Agreement without a hearing. Because this Agreement was reached through voluntary negotiations, it does not raise issues requiring a hearing and does not concern other parties who were not party to the negotiations. Expedient approval would further the public interest.

Respectfully submitted this 19<sup>th</sup> day of May, 2011.

**Qwest Corporation**

 *paralegal for:*

Lisa A Anderl, Attorney for Qwest

**CERTIFICATE OF SERVICE**

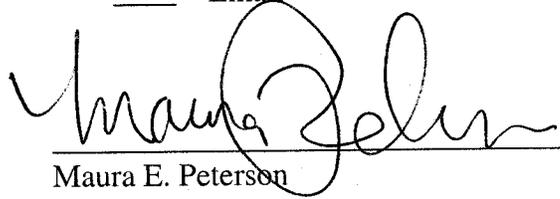
I hereby certify that on this 19<sup>th</sup> day of May, 2011, I served the foregoing **APPLICATION FOR APPROVAL OF AGREEMENT TO ADOPT INTERCONNECTION AGREEMENT** upon all parties of record in this matter as follows:

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
P.O. Box 83720  
Boise, Idaho 83720-0074  
[jjewell@puc.state.id.us](mailto:jjewell@puc.state.id.us)

- Hand Delivery
- U. S. Mail
- Overnight Delivery
- Facsimile
- Email

Alexander E. Gertsburg, Esq.  
Broadvox, Inc.  
1228 Euclid Ave. Suite 390  
Cleveland, OH 44115

- Hand Delivery
- U. S. Mail
- Overnight Delivery
- Facsimile
- Email

  
\_\_\_\_\_  
Maura E. Peterson  
Paralegal

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2011 MAY 20 AM 9:14

Qwest 

April 25, 2011

IDAHO PUBLIC  
UTILITIES COMMISSION

Alexander E. Gertsburg, Esq.,  
Broadvox, Inc.  
1228 Euclid Avenue, Suite 390  
Cleveland, OH 44115

Mr. Gertsburg:

We have received your request that, under Section 252(i) of the Telecommunications Act of 1996, Broadvox-CLEC, LLC ("CLEC") wishes to adopt in its entirety, the terms of the Wireline Interconnection Agreements and any associated amendments, if applicable, (the "Underlying Agreements") between Neutral Tandem, Inc. and Qwest Corporation ("Qwest"), for the States listed below. CLEC is incorporated in the State of Ohio. We understand you have a complete copy of the Underlying Agreements.

State	Adoption of	Agreement #	Approved by the State Commission	Expire Date
Arizona	Neutral Tandem, Inc.	CDS-100414-0004	7-23-2010	7-14-2013
Colorado	Neutral Tandem, Inc.	CDS-100422-0001	8-8-2010	7-21-2013
Idaho	Neutral Tandem, Inc.	CDS-100316-0001	6-21-2010	6-17-2013
Iowa	Neutral Tandem, Inc.	CDS-100402-0001	6-15-2010	7-2-2013
Minnesota	Neutral Tandem, Inc.	CDS-100422-0003	6-23-2010	7-27-2013
Montana	Neutral Tandem, Inc.	CDS-100319-0003	8-17-2010	6-19-2013
Nebraska	Neutral Tandem, Inc.	CDS-100402-0002	7-13-2010	7-2-2013
New Mexico	Neutral Tandem, Inc.	CDS-100402-0003	8-8-2010	7-1-2013
North Dakota	Neutral Tandem, Inc.	CDS-100325-0001	8-17-2010	6-25-2013
Oregon	Neutral Tandem, Inc.	CDS-100414-0001	8-3-2010	7-14-2013
South Dakota	Neutral Tandem, Inc.	CDS-100325-0002	6-24-2010	6-25-2013
Utah	Neutral Tandem, Inc.	CDS-100414-0002	8-16-2010	7-14-2013
Washington	Neutral Tandem, Inc.	CDS-100422-0002	9-3-2010	7-21-2013
Wyoming	Neutral Tandem, Inc.	CDS-100317-0001	7-7-2010	7-17-2013

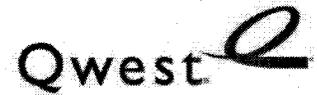
By their respective signatures below, Qwest and CLEC (individually, a "Party," or collectively, the "Parties") intend that this letter serves as their agreement for multiple states ("Letter Agreement") for CLEC to adopt the Underlying Agreements under the following terms and conditions:

- The Parties shall request the Commissions to expedite its review and approval of this Letter Agreement. This Letter Agreement shall become effective upon such approval. **Pursuant to the Underlying Agreement CLEC is adopting, these Agreements shall expire on the same date as the Underlying Agreements.** If for some reason any Commission rejects all or part of the Letter Agreement either Party may at its option declare the remainder of the Agreement void and be excused from any performance thereunder.

April 25, 2011/swd-ms/Broadvox-CLEC, LLC

(Adoption of Neutral Tandem, Inc.)

(AZ= CDS-110420-0001); (CO= CDS-110420-0002); (IA= CDS-110420-0003); (ID= CDS-110420-0004);  
(MN= CDS-110420-0005); (MT= CDS-110420-0006); (ND= CDS-110420-0007); (NE= CDS-110420-0008);  
(NM= CDS-110420-0009); (OR= CDS-110420-0010); (SD= CDS-110420-0011); (UT= CDS-110420-0012);  
(WA= CDS-110420-0013); (WY= CDS-110420-0014)



2. Notwithstanding the mutual commitments set forth herein, Qwest is entering into this Letter Agreement without prejudice to any positions it has taken previously, or may take in the future, in any legislative, regulatory, or other public forum addressing any matters, including those relating to the types of arrangements contained in the Underlying Agreements. During the proceeding in which the Commission is to review and approve the Letter Agreement, a Party may point out that it has objected, and continues to object, to the inclusion of the terms and conditions to which it objected in the proceedings involving the approval of the Underlying Agreements.

3. CLEC adopts the terms and conditions of the Underlying Agreements for interconnection with Qwest Corporation and in applying the terms and conditions, agrees that Broadvox-CLEC, LLC be substituted in place of "Neutral Tandem, Inc." throughout the Underlying Agreements wherever the latter appears.

4. Qwest requests that notice to Qwest Corporation as may be required under the Underlying Agreements shall be provided as follows:

Qwest Corporation  
Director Interconnection Agreements  
930 15<sup>th</sup> Street, 6<sup>th</sup> floor  
Denver, CO 80202  
Phone: 303-672-2879  
Email: [intagree@qwest.com](mailto:intagree@qwest.com)

With copy to:  
Qwest Law Department  
Wholesale Interconnection  
1801 California Street, 10th Floor  
Denver, CO 80202  
Phone: 303-383-6553  
Email: [Legal.Interconnection@qwest.com](mailto:Legal.Interconnection@qwest.com)

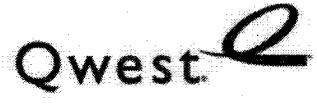
CLEC requests that notice to CLEC as may be required under the Underlying Agreements shall be provided as follows:

Alexander E. Gertsburg, Esq.,  
Broadvox, Inc.  
1228 Euclid Avenue, Suite 390  
Cleveland, OH 44115  
(404) 442-0184  
[agertsburg@broadvox.com](mailto:agertsburg@broadvox.com)

5. CLEC represents and warrants that it is a certified provider of local telecommunication service in the States and that this Letter Agreement will cover services in these states only.

6. Please sign electronically via the DocuSign® process within thirty (30) days. After thirty (30) days Qwest may rescind its willingness to consider this Letter Agreement's terms and conditions.

7. Please note that Qwest will file this Letter Agreement with each of the appropriate state commission for approval; however, some state commissions will not approve the Letter Agreement until the CLEC is certified by the state commission. You may want to contact the appropriate state commission to determine the requisite filing guidelines.



Sincerely,

05E9FC68BD57454...  
*L T Christensen*  
DocuSigned By: L T Christensen

5/5/2011

L. T. Christensen  
Director – Wholesale Contracts  
Qwest Corporation  
930 15<sup>th</sup> Street, 6<sup>th</sup> floor  
Denver, Colorado 80202

Date

I agree to all terms and conditions contained in this letter as indicated by my signature below:

**Broadvox-CLEC, LLC**

DocuSigned by:  
*Alexander E. Gertsburg, Esq.,*  
ECE69014E62C49E...

Signature

Alexander E. Gertsburg, Esq.,

Name Printed

Corporate Secretary

Title

4/26/2011

Date