

Qwest's North America IP Network Peering Policy

June 6, 2007

1. Overview

Qwest Communications Corporation ("Qwest") strives to provide premier direct Internet access to all customers. To accomplish this, Qwest has developed this peering policy to provide guidelines for the selection of Interconnection Candidates based in North America. Qwest selects Interconnection Candidates based upon, among other things, costs, port availability and bandwidth capacity at particular locations, and the overall strategic benefit Qwest will experience with the connection. Compliance with the technical and operational requirements in the policy does not guarantee a peering relationship with Qwest.

In an attempt to measure accurately the traffic ratios between Qwest and Interconnection Candidate, Qwest may require a trial peering connection with Interconnection Candidate. Such a trial shall only occur pursuant to a Peering Trial Agreement. Although Qwest only considers private peering initiatives, Qwest may agree to enter into a public interconnection relationship as part of the trial connection. In no case will a public peering connection continue beyond an initial trial. A successful peering trial does not guarantee that Qwest will agree to peer with Interconnection Candidate.

2. Basic Definitions

- a. "IP Network" means a communications network running TCP/IP and other Internet protocols.
- b. "Interconnection Point" means the place where two IP Networks are connected by dedicated bandwidth for the purpose of exchanging Internet traffic.
- c. "Route" means a unique path along which data is directed on the public Internet and/or on either party's IP Network.
- d. "Border Gateway Protocol 4" or "BGP4" means protocol used to exchange routing information between collaborating routers on the Internet.
- e. "Peering" is the settlement-free exchange of IP traffic between service providers operating IP Networks.

3. Technical Requirements

- a. Network Capacity Requirements: Interconnection Candidate shall have OC192 pop to pop trunking speeds, i.e., an OC192 backbone.
- b. Scope of IP Network: Interconnection Candidate shall have a national network with IP traffic termination ("IP Pops") in a minimum of 10 major Metropolitan Statistical Areas located in at least three U.S. time zones, which shall include the Eastern, Pacific, and Central time zones.
- c. Interconnect: Interconnect Candidate shall have the ability to interconnect with Qwest in a minimum of six geographically diverse Interconnection Points where Qwest has interconnection points of presence. The Interconnection Candidate

- must have the ability to interconnect directly at OC-12 (622 mbps) or greater capacity levels at each point of interconnection.
- d. **Traffic Ratios:** Interconnect Candidate shall have a 1.5:1 aggregate traffic ratio with 1,500 Mbps sustained bi-directional traffic flows, measured at 95% peak. The distribution must be a minimum 60/40 ratio of bi-directional traffic balanced in three time zones. The Interconnection Candidate must provide 24-hour peak and average traffic volume statistics at each Interconnection Point. The quantity and speed of circuits between Qwest and Interconnection Candidate will be determined by overall traffic between the two parties, and shall be reviewed periodically.
 - e. **Routes:** Interconnection Candidate must carry full customer routes in Interconnect routers, and announce consistent routes using BGP4 at all peering locations. Interconnection Candidate must use the same peering AS at each U.S. interconnection point. Interconnection Candidate must not establish a route of last resort (i.e., default route) directed toward Qwest. The Interconnection Candidate may not advertise third party routes that allow direct traffic exchange (in either direction) between Qwest and customers of the Interconnection Candidate.
 - f. **Transit Autonomous Systems:** Interconnection Candidate shall provide transit services to at least 500 unique IP Networks/Autonomous Systems.

4. Operational Requirements

- a. Interconnection Candidate must have a fully staffed, 24x7x365, network operations center ("NOC").
- b. Interconnection Candidate must provide 48 hours notice to Qwest NOC for scheduled maintenance.
- c. Interconnection Candidate must provide trouble reporting and escalation procedures to Qwest. Qwest must have the ability to open tickets with Interconnection Candidate.
- d. Interconnection Candidate must maintain a publicly accessible looking glass server with BGP views and traceroute capabilities from 5 cities spread across 3 U.S. time zones.

5. General Information

- a. The peering policy is only a guideline. Meeting or exceeding all of the above requirements does not guarantee Qwest will enter into a peering relationship with Interconnection Candidate.
- b. Peering will only occur if Qwest and Interconnection Candidate reach agreement on the terms of a Peering Agreement.
- c. Qwest maintains the right to change this policy at any time without written notification. It is the responsibility of Interconnection Candidate to maintain compliance with the policy. The policy is located at www.Qwest.com/legal.
- d. Send peering inquiries to peering@qwest.com.