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January 29, 2004

Via Overnight Delivery

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P. O. Box 47250
Olympia, Washington 98504-7250

Re: In the Matter of the Petition of Qwest Corporation in Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order, Docket No. UT-033044.

Dear Ms. Washburn:

Enclosed for filing are the original and 14 copies of corrected pages 17 and 35 to the Direct Testimony of Robert V. Falcone on Behalf of AT&T on Network Architecture (Exhibit RVF-1T) in this matter.

On page 17, California was corrected to Washington, SBC and Verizon were changed to Qwest and the correct number of wire centers was provided for Qwest. On page 35, the reference to Exhibit RVF-9 was corrected to Exhibit RVF-10. Please remove pages 17 and 35 and replace them with the new pages.

Thank you,

Adam Walczak

Enclosures
cc: Service List

Accordingly, CLECs cannot use the same kind of connections, *i.e.*, merely the MDF jumper wire pairs used by ILECs, to link their customers' loops to their distant switches. Rather, CLECs must deploy an extensive *backhaul network* that extends the existing customer loops – all of which terminate at ILEC wire centers – to a distant CLEC switching location. In Washington, there are 112 Qwest wire centers from which CLECs must "backhaul" end-user loops if they want to use their own switching to serve customers in all of Qwest's service area.

Q. WHAT MUST A CLEC DO TO "BACKHAUL" ITS CUSTOMERS' TRAFFIC TO ITS OWN SWITCH?

A. For a CLEC to "backhaul" its customers' traffic to its own switch, the CLEC must first create an overlay network infrastructure that is largely dedicated to the subset of customers won from the incumbent in a specific wire center. In essence, the CLEC must add a very long, costly and dedicated "extension cord" to connect its end-users' loops to its switches. This requires the CLEC to:

(1) establish and maintain collocations at ILEC wire centers, where customers' loops are "collected;"

(2) install and maintain the equipment necessary to digitize and, using concentration and multiplexing techniques, aggregate the traffic on those loops to permit connections to the CLEC's switch at acceptable quality levels; and

(3) establish the necessary transport facilities that provide the physical path connecting the CLEC's collocations and its switch.

Only after all of this infrastructure and these functionalities are in place and operational in each ILEC wire center in which it wishes to compete can a switch-

of the additional tandem switching costs and transport facilities that will be needed to complete each of its calls. Additionally, because the CLEC will route a large percentage of its traffic to the ILEC's tandem switch, it will face the potential for operational impairments such as inadequate subtending trunking from the ILEC's tandems to its end offices (See Exhibit RVF-10).

VI. CONCLUSION

Q. CAN THE FUNDAMENTAL CHARACTERISTICS OF THE EXISTING SINGLE-USE ILEC NETWORK BE MITIGATED WITHOUT TECHNOLOGICAL CHANGE?

A. No. Until the underlying local network architecture that has created these impairments is changed, CLECs will continue to face significant practical and economic impairments in serving mass market end-users on ILEC loops *via* their own switches.

Q. PLEASE SUMMARIZE THE CRITICAL ISSUES YOU DISCUSS IN YOUR TESTIMONY.

A. The critical issue of this proceeding is not whether CLECs can "deploy" their own switches. Instead, the critical issue upon which this Commission should focus is whether a CLEC can "efficiently use" its own switch to connect to the local loops of end users. The differences in the way end users' loops are connected to carriers'