

Washington
UT-043045
COVAD 01-013

INTERVENOR: Covad Communications Company

REQUEST NO: 013

Please list all Qwest products and services not subject to TELRIC pricing that Qwest believes are subject to change management within the Change Management Process for Local Service (CMP).

RESPONSE:

Qwest objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is overly broad and burdensome. In addition, Qwest objects to the request in that it would require Qwest to conduct a special study and to develop data that does not already exist.

Without waiving said objection, Qwest states: Qwest does not manage change requests on the basis of product pricing. Per the Change Management Process Document dated 4-19-04, "CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services (local exchange service) provided by Competitive Local Exchange Carriers (CLECs) to their end users." (CMP Document Section 1.0).

Respondent: Legal
Renee Albersheim