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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of Qwest Corporation
for Competitive Classification
of Basic Business Exchange Telecommunications
Services

No. Docket UT-030614

QWEST CORPORATION'S
RESPONSE ON ISSUES RAISED IN
STAFF'S MOTION REQUESTING
PRODUCTION OF INFORMATION

Qwest Corporation ("Qwest") hereby files this Response to the Commission's June 18, 2003 Request for Responses on Issues Raised in Staff's Motion Requesting Production of Information. The questions posed in the Request are detailed below with answers immediately following.

- For CLECs who provide facilities-based service, would adequate information be provided if responses were based on Qwest exchanges, or other parameters, rather than Qwest wire centers?

Response: Qwest supports requesting the desired information at a wire center level. Qwest has provided its data supporting its Petition at the state, regional, exchange and wire center levels. Qwest believes that the additional data sought from the CLECs through Commission Staff's request for information would be most easily evaluated if it could be categorized in a manner similar to the Qwest data. If such data is not readily available at the wire center level, Qwest supports obtaining information at the most detailed level available.

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- For CLECs that provide services based on Qwest’s facilities, would Qwest be the logical provider of the information Staff seeks regarding location of services by wire center?

Response: Yes. In addition to providing data supporting its Petition at the state, regional, exchange, and wire center levels, Qwest has also provided masked information that categorizes its supporting data by the various CLECs purchasing the wholesale services. Consequently, the data is already available as a part of Qwest’s Petition.

- Is there any objection to the inclusion of additional or revised requests for information as proposed by Public Counsel and WeBTEC?

Response: Qwest has reviewed Staff’s Response to Issues Raised in Answers to Staff’s Motion and concurs with Staff’s responses to the additions or revisions proposed by Public Counsel and WeBTEC.

- If a further protective order is entered in this proceeding, should it reflect the highly confidential provisions contained in the protective order entered in Docket No. UT-000883, Second Supplemental - Protective Order, July 31, 2000? If not, why not? What further protective provisions, if any, would be appropriate?

Response: Qwest supports the use of a protective order that would allow it access to CLEC information. The protective order in Docket No. UT-000883 contained a provision that prohibited all parties except Staff from seeing CLEC confidential information. This provision is unnecessary in this proceeding. Any party who agrees to be bound by the standard protective order should be allowed access to confidential information, with the expectation that such information will be treated and handled in accordance with the confidentiality protections. If any party feels that a “highly confidential” designation is necessary, that party should make a request for heightened protection. However, there should not be a provision that denies a party any opportunity to review material upon which recommendations will be made, and upon which the Commission may base a decision.

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- In light of AT&T and MCI's answer that they would need additional time to respond and in light of the possible need to request information from Qwest in circumstances where Qwest provides facilities upon which CLEC service is based, should the time frames for responses to Staff's motion be lengthened? What is a reasonable alternative deadline for production of information? Would Qwest be willing to lengthen its waiver of the statutory deadline for completion of the proceeding to accommodate the additional time needed?

Response: Qwest does not believe there is a need for delay. Qwest has already provided much information in regard to the wholesale services being purchased by CLECs to compete with the services for which Qwest seeks competitive classification. If more information is required, Qwest will respond as soon as practicable.

- Any other matters raised in the answers that the parties wish to address at this time.

Response: Qwest has no additional matters to discuss at this time.

Dated this 23rd day of June, 2003.

Qwest Corporation

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