

Washington
UT-043045
COVAD 01-014

INTERVENOR: Covad Communications Company

REQUEST NO: 014

With respect to regeneration equipment used to provide regeneration of CLEC-to-CLEC cross connections ("Equipment"):

a. Please disclose whether this Equipment is also used to provide regeneration for (i) ILEC-to-CLEC connections; (ii) IXC arrangements not subject to section 251 of the Act; (iii) Qwest's own facilities.

b. If the Equipment is used for any purpose other than the regeneration of signals within Qwest's central offices, please disclose these uses and the specific products, both retail and wholesale, associated with these uses.

c. If the answer to any subsection of (a) above is yes, please describe how Qwest allocates the costs associated with this Equipment between the products/services set forth in (a), and what percentage of these costs is allocated to each service.

d. If the answer to (a) is yes, please indicate what percentage of the total cost of the Equipment is included in Qwest's collocation cost study (as referenced in Michael Norman's Response Testimony at Page 13, Lines 6-9), and what percentage has been excluded from this cost study due to the Equipment's use for providing services Qwest does not include in its wholesale cost study.

RESPONSE:

a. Yes, this equipment is also used to provide regeneration in all three circumstances. Within the central office, in each case, the signaling requirement is based on the ANSI Standard T1.102.

b. Within the central office, Qwest only uses regeneration equipment for boosting the signal to meet the ANSI standard.

c. Currently, Qwest does not perform cost studies on ILEC to CLEC regeneration within the central office at a wholesale rate because Qwest has agreed not to charge for regeneration in this circumstance. Therefore, Qwest does not allocate the costs associated with this regeneration equipment.

d. Please see the response to subpart c, above.

Respondent: Michael Wolz, Qwest Manager
Maryann Klasinski, Qwest Manager