

Washington
UT-043045
COVAD 01-002

INTERVENOR: Covad Communications Company

REQUEST NO: 002

Please identify all Qwcst rate elements and rates that would apply to transport data, via Qwest facilities, from a given customer's Network Interface Device to the Central Office demarcation point in circumstances where a CLEC deploys a remote DSLAM between Qwest's feeder and distribution subloop within, or adjacent to, a Qwest remote terminal.

RESPONSE:

Qwest objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. In particular, the right of an ILEC to retire copper facilities, as confirmed in the *Triennial Review Order*, is not conditioned upon the cost to a competitive local exchange carrier ("CLEC") of using a DSLAM.

Respondent: Legal
Karen Stewart

Washington
UT-043045
COVAD 01-003

INTERVENOR: Covad Communications Company

REQUEST NO: 003

Please state the number of FTTH loops, as that term is defined by the Federal Communications Commission, Qwest has in service in Washington today; in the last 12 months; in the last 24 months; and in the last 36 months.

RESPONSE:

Qwest objects to this request on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. In particular, the right of an ILEC to retire copper facilities, as confirmed in the *Triennial Review Order*, is not conditioned upon or related to the number of FTTH loops it has in service.

Without waiving said objection, Qwest states: Qwest has no FTTH loops in Washington.

Respondent: Legal
Michael Wolz

Washington
UT-043045
COVAD 01-004

INTERVENOR: Covad Communications Company

REQUEST NO: 004

Please provide copies of all documents related to Qwest's future plans to deploy FTTH loops in Washington.

RESPONSE:

Qwest objects to this request on the ground that the reference to "Qwest's plans for deploying FTTH loops" is vague and ambiguous. Further, Qwest objects on the ground that this request is not reasonably calculated to lead to the discovery of admissible evidence. In particular, the right of an ILEC to retire copper facilities, as confirmed in the *Triennial Review Order*, is not related to or conditioned upon the volume of FTTH loops the ILEC may deploy.

Respondent: Legal
Michael Wolz

Washington
UT-043045
COVAD 01-006

INTERVENOR: Covad Communications Company

REQUEST NO: 006

How many Qwest fiber loop plant installations resulted in the Qwest-owned existing copper becoming unavailable for continued use as discussed by Karen Stewart in her Direct Testimony, page 3, starting on line 13?

RESPONSE:

Qwest objects to this request on the grounds that it is overly broad in that the request is not limited to Washington. In addition, the request is not reasonably calculated to lead to the discovery of admissible evidence. The right of an ILEC to retire copper facilities, as confirmed in the *Triennial Review Order*, is not related to or conditioned upon the number of fiber installations that cause copper facilities to become unavailable for use. Qwest also objects to this request to the extent it calls for a special study or the gathering of data that do not already exist.

Respondent: Legal
Karen Stewart

Washington
UT-043045
COVAD 01-007

INTERVENOR: Covad Communications Company

REQUEST NO: 007

How many copper feeder routes has Qwest deployed in the wire centers located in Washington where Covad is collocated?

RESPONSE:

Qwest objects to this request on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. The right of an ILEC to retire copper facilities, as confirmed in the *Triennial Review Order*, is not related to or conditioned upon the number of feeder routes an ILEC has deployed in individual wire centers. Qwest also objects to this request to the extent it calls for a special study or the development of data that do not already exist.

Respondent: Legal
Michael Wolz

Washington
UT-043045
COVAD 01-008

INTERVENOR: Covad Communications Company

REQUEST NO: 008

When Qwest places fiber to replace copper feeder, at what distance from the central office does Qwest place the first fiber terminal? If the answer to this question varies, please provide (1) a copy of all documentation used by Qwest personnel, including, but not + limited to, engineering manuals or rules, used to make these determinations, and (2) the longest and shortest such distance that Qwest has actually placed such terminals in Washington.

RESPONSE:

Qwest objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. The right of an ILEC to retire copper facilities, as confirmed in the *Triennial Review Order*, is not related to or conditioned upon the distance from a central office that Qwest places fiber terminals.

Without waiving Qwest's objection, Qwest states: 12Kft to 15Kft is standard when using digital loop carrier.

1. Please see Qwest technical publications located at the following url:
<http://www.qwest.com/techpub/>.

2. Please see Confidential Attachment "A" for the longest and shortest distance that Qwest has actually placed the first fiber terminal in the state of Washington.

Respondent: Legal
Michael Wolz
Maryann Klasinski

The longest distance is 122 Kft; the shortest distance is 1 Kft.

Washington
UT-043045
COVAD 01-009

INTERVENOR: Covad Communications Company

REQUEST NO: 009

When Qwest deploys fiber feeder and retires copper feeder along the same route, by what method (e.g., copper loop, FTTH loop) does Qwest serve customers, formerly served by that copper feeder, located between the serving central office and the first remote terminal/fiber terminal deployed?

RESPONSE:

Qwest objects to this request on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. The right of an ILEC to retire copper facilities, as confirmed in the Triennial Review Order, is not related to or conditioned upon the methods an ILEC uses to serve customers that were served by copper feeder that the ILEC has retired. Notwithstanding this objection, Qwest states that in a majority of cases, it does not retire copper feeder when it deploys fiber feeder and when it is technically feasible to leave the copper feeder in place. In the unique situation assumed in this data request, upon retiring copper feeder, Qwest would continue to provide services via virtual channels running from a central office to a remote/fiber terminal.

Respondent: Legal
Karen Stewart

Washington
UT-043045
COVAD 01-010

INTERVENOR: Covad Communications Company

REQUEST NO: 010

How many times during the past ten (10) years has Qwest reactivated abandoned buried cable after its original abandonment due to placing fiber? (See Karen Stewart's Direct Testimony,, page 4, starting on line 17).

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 abandon cable for a period of time and re-use it later.

Respondent: Legal
Michael Wolz

Washington
UT-043045
COVAD 01-011

INTERVENOR: Covad Communications Company

REQUEST NO: 011

How many times has Qwest been required to replace copper with fiber due to a municipal or other government mandate in the State of Washington?

RESPONSE:

Qwest objects to this request on the grounds that it is overly broad in that the request is not limited to Washington. In addition, Qwest objects to the request in that it would require Qwest to conduct a special study and to develop data that do not already exist.

Without waiving said objection, Qwest states: There are no Qwest recorded instances of government mandates requiring Qwest to replace copper facilities with fiber facilities. Municipalities leave choice of transmission medium to the service provider. Bandwidth requirements and/or economics may preclude the use of copper and dictate fiber and related fiber electronics deployment.

Respondent: Legal
Michael Wolz

Washington
UT-043045
COVAD 01-012

INTERVENOR: Covad Communications Company

REQUEST NO: 012

How many fiber fed DSLAMs has Qwest deployed in its network? (See Karen Stewart's Direct Testimony, page 6).

RESPONSE:

Qwest objects to this request on the grounds that it is overly broad in that the request is not limited to Washington. In addition, Qwest objects to the request in that it would require Qwest to conduct a special study and to develop data that do not already exist.

Without waiving said objection, Qwest states: Qwest does not track this information.

Respondent: Legal
Michael Wolz