

Before the

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UT-053025

VERIZON NORTHWEST INC.

RESPONSES TO WUTC STAFF INFORMATION REQUEST NOS. 1-4

FEBRUARY 28, 2006

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Verizon Northwest Inc. Responses to WUTC Staff Information Request Set 1 Nos. 1-4

February 28, 2006

INFORMATION REQUEST NO. 1:

Please provide a list of wire centers in the Company's service territory in Washington that will be designated as "non-impaired" pursuant to the final rule in Appendix B of the FCC's Triennial Review Remand Order (TRRO) and specifically identify each wire center on the list for DS1 and DS3 Loops, and DS1, DS3 and Dark Fiber transport.

Response:

Please see Attachment "WA UTC_Set1_Attach1_1".

Prepared By: Thomas Bausch

Date: 02/24/06

Witness: N/A

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INFORMATION REQUEST NO. 2:

Please identify for each wire center whether it is classified as a tier 1 or tier 2 wire center, and whether the calculation is based on the number of fiber-based collocators (include the names of the collocators), or the number of business lines (line counts by each carrier) or both.

Response:

Please see Highly Confidential Attachment "WA UTC_Set1_Attach1_2-HIGHLY CONFIDENTIAL".

Prepared By: Thomas Bausch / Darnell Morris

Date: 02/24/06

Witness: N/A

INFORMATION REQUEST NO. 3:

For each of the wire centers listed as “non-impaired”, please provide a descriptive explanation and data necessary for the Commission and other participants to validate. The underlying data, at minimum, should include the following:

- (i) The total number of fiber-based collocators as defined in 47 C.F.R. § 51.5.
- (ii) The date on which the number of fiber-based collocators was determined.
- (iii) The name of each fiber-based collocator.
- (iv) If the ILEC requested affirmation from a carrier regarding whether or not the carrier, if included in part (iii) above, was a fiber-based collocator, please provide documents to support whether the carrier affirmed, denied or did not respond to the ILEC’s request.
- (v) The total number of business lines as defined in 47 C.F.R. § 51.5.
- (vi) The date on which the business line counts data was calculated. Note: If different components of the business line counts come from sources representing different points in time, then each component should be identified and the corresponding date for each component provided.
- (vii) Total ILEC business switched access lines.
- (viii) If the methodology used to determine the line counts in (vii) above differ from the methodology used to determine switched business line counts for ARMIS 43-08, describe the differences and any data that would allow the Commission or participants to reconcile this data.
- (ix) Total UNE Loops for each CLEC.
- (x) Number of UNE Loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement).
- (xi) Number of UNE Loops, for each CLEC, where the ILEC does not provide switching.
- (xii) If different from (x) above, the number of business loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement). If this information is not available, indicate whether the response to (x) includes both business and residential loops.
- (xiii) If different from (xi) above, the number of switched business loops, for each CLEC, where the ILEC does not provide switching. If this information is not available, indicate whether the response to (xi) includes both business and residential loops, switched and non-switched loops.
- (xiv) If the total of UNE Loops in (x) and (xi) above does not equal (ix) above, explain the difference, including any data that would allow participants to reconcile this data.

- (xv) Provide all underlying data, calculations and any description used to count digital access lines on a 64-kbps-equivalent basis for the counts in (vii) and (xi) above.
- (xvi) Verify that line counts associated with remote switch locations are associated with the remote and not the host switch. If this is not the case, explain why not.

Response:

- (i) Please see response to IR 2 and Highly Confidential Attachment “WA UTC_Set1_Attach1_2-HIGHLY CONFIDENTIAL”.
- (ii) March 11, 2005 was the effective date of Verizon’s data, however, the physical inspections performed to determine the number of fiber based collocators were performed prior to this date.
- (iii) Please see response to IR 2 and Highly Confidential Attachment “WA UTC_Set1_Attach1_2-HIGHLY CONFIDENTIAL”.
- (iv) Verizon did not specifically request affirmation from each carrier regarding whether or not the carrier was a fiber-based collocator. However, Verizon, in its March 1, 2005 correspondence that provided the wire center list to the CLEC industry notified the CLECs how to obtain appropriate backup data and specifically requested that CLECs contact Verizon should they have verifiable data that demonstrated that either wire center should not be identified as nonimpaired.
- (v) Please see response to IR 2 and Highly Confidential Attachment “WA UTC_Set1_Attach1_2-HIGHLY CONFIDENTIAL”.
- (vi) All components of the business line counts were determined as of December 31, 2003. Please see response to IR 2 and Highly Confidential Attachment “WA UTC_Set1_Attach1_2-HIGHLY CONFIDENTIAL”.
- (vii) Please see response to IR 2 and Highly Confidential Attachment “WA UTC_Set1_Attach1_2-HIGHLY CONFIDENTIAL”.
- (viii) The methodology used to determine the line counts in (vii) is the same as the methodology used to determine switched business line counts for ARMIS 43-08. Please see response to IR 2 and Highly Confidential Attachment “WA UTC_Set1_Attach1_2-HIGHLY CONFIDENTIAL”.
- (ix) Please see Highly Confidential Attachment “WA UTC_Set1_Attach1_3 ix-HIGHLY CONFIDENTIAL CODED”.
- (x) Verizon did not consider the number of UNE Loops, for each CLEC, provided in combination with ILEC switching for purposes of counting UNE loops in assessing non-impairment status. Loops provided in combination with ILEC switching (e.g. commercial arrangements) are not included in total UNE Loops provided in Part (ix) but rather are included in the business switched access lines provided in ARMIS 43-08.
- (xi) Please see response to IR 3(ix) and Highly Confidential Attachment “WA UTC_Set1_Attach1_3 ix-HIGHLY CONFIDENTIAL CODED”.

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- (xii) Please see response to IR 3(x) and also response to IR 2 and Highly Confidential Attachment "WA UTC_Set1_Attach1_2-HIGHLY CONFIDENTIAL".
- (xiii) Please see response to IR 3(x) and also Highly Confidential Attachment "WA UTC_Set1_Attach1_3 xiii-HIGHLY CONFIDENTIAL CODED".
- (xiv) Because of the methodology explained in (x) above, the total of UNE Loops in (x) and (xi) above equal the loops reported for (ix). Therefore, no reconciliation is needed.
- (xv) All lines are counted on a DS0 or voice grade equivalency basis. All business lines and UNE loops have a VGE conversion factor of 1, with the following exceptions:
 - ISDN BRI is counted as 2,
 - ISDN PRI as 23,
 - DS1 as 24,
 - DS3 as 672
- (xvi) Verizon will respond to this request no later than March 2, 2006.

Prepared By: (i)-(iii); (xv) – Thomas Bausch; (iv) – Robert Graves; (v)-(xiv) – Darnell Morris; (xvi) – Kim Douglass

Date: 02/24/06

Witness: N/A

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INFORMATION REQUEST NO. 4:

If the calculation of number of lines (or inclusion of certain lines) is based on a directive from the FCC as Qwest has indicated during the workshop, please provide the detailed citations of the FCC's decision(s).

Response:

Verizon's calculations were based upon the FCC's TRRO, Appendix B – Final Rules, § 51.5 (terms and definitions of a business line).

Prepared By: Robert Graves

Date: 02/24/06

Witness: N/A