

**Discovery Requests for 90 Day Proceedings**

1. Please identify all switches owned or controlled by [company] that are being used in [state] to provide service to customers served by facilities at or above the DS-1 level. For each switch, please state (1) the type of switch; (2) the date of purchase, purchase price and/or EF&I (engineering, furnish & install) cost of the switch; (3) the location of the switch; (4) the current number of installed lines and trunks; and (5) the number and percentage of customers that are being served by DS-1 and above facilities that are self-provided by [company] and are not leased from another carrier.
  
2. Please report (in Excel spreadsheet format) the number of DS1 level business lines in [state] served by unbundled loops for which [company] provides switching dial tone functionality. In responding to this request, please separate loop facilities by the categories set forth in the following table:

Sample Response Form							
<u>State</u>	<u>Wire Center</u>	<u>Residential</u>			<u>Business</u>		
		# DS1 lines served via your facilities	# <u>DS1 lines served via Qwest leased facilities</u>	# <u>DS1 lines served via leased from third party</u>	# DS1 lines served via your facilities	# <u>DS1 lines served via Qwest leased facilities</u>	# <u>DS1 lines served via leased from third party</u>

3. For each switch in [state] that [company] owns or controls and that is providing switching for local voice services, please report (in Excel spreadsheet format): (a) whether the switch is serving mass market customers, enterprise customers or both; (b) whether the switch is serving third-party local service providers; (c) the number of mass market switching ports; (d) the number of enterprise switching ports. In each instance, if the response is yes, please report the percentage of “in service” switching lines and trunks relative to installed lines and trunks in the switch.

Sample Response Form						
Switch CLLI Code	Switch serving mass markets, enterprise or both (M, E, B)	(if yes) % of switching ports in service	Switch serving 3 <sup>rd</sup> party local service providers? (y/n)	(if yes) % of switching ports in service	# of mass markets switching ports	# of enterprise switching ports

4. For each switch that [company] operates, controls, maintains, or from which you lease dial tone or trunking functionality/capacity within [state], please report (in Excel spreadsheet format) whether the switch is currently providing switching for local voice grade services, tandem switching<sup>1</sup> for voice calls, or both. In addition, for each switch, please provide traffic volumes, expressed in minutes of use, for year 2002 for local traffic and tandem traffic. If these data are not available for year 2002, please provide the information for the most recent 12-month period for which the data are available. Provide all documents that reflect, refer or relate to the information you provide in response to this request. In addition, please provide the following information for each switch:

- a. Switch type;
  - b. The generic (feature package) loaded in the switch;
  - c. Current number of equipped lines in the switch;
  - d. The current number of equipped trunks in the switch;
  - e. 2001 and 2002 line growth for the switch; and
  - f. 2001 and 2002 trunk growth for the switch.
5. Does [company] currently order high capacity UNE-P circuits such as UNE-P-DSS or UNE-P-PRI from Qwest or any other ILEC? If yes, identify the wire centers from which [company] orders such circuits and the number of such circuits [company] currently has in service in each wire center.
6. Please state whether [company] has purchased switching (wholesale or retail) in [state] from any entity other than Qwest. If [company] has purchased switching from any entity other than Qwest, please identify all such entities and identify the locations of their switches that are providing the switching and the locations of the customers served by [company] via those switches.
7. Please state whether [company] is using any partitioned switches in [state] that it owns, leases, or otherwise controls jointly with another carrier(s) and whether you share a CLLI with another carrier for the switch. Please identify the locations of any such switches and the identities of the other carriers and describe the capacity and capability of the partition that [company] owns, leases, or otherwise controls. As used in this request, “partitioned” means switches shared by different entities.

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<sup>1</sup> Tandem switching is defined as switching of telephone traffic between two subtending end offices.

8. Please provide the average total revenue per line that [company] has received from its business customers within [state] in each of the past two years. The average revenue per line should include revenues associated with the basic retail price charged to business customers, vertical features, universal service payments, access charges, subscriber line charges, toll, long distance, local number portability, data, international calling, and line revenues derived from any other sources. Please provide both the total average revenue per line and a breakdown of the amount of revenue for each category of revenue that comprises the total. In addition, please list intraLATA and interLATA revenues separately. If revenues differ depending on the type of business customer (small vs. large), please provide the total revenues and the breakdown of revenues by type of business customer. Please provide the information by POTS, DS0, DS1, DS3, OC-3, OC-12, OC-48, and any other relevant categories. Please produce all documents that reflect, refer or relate to the information provided in your response to this request.

9. Please provide the average total cost per line that [company] has incurred for lines used to serve business customers within [state] for each of the past two years, and in addition to a total average, please provide separate averages for service provided through UNE-P, UNE-L, and with [company]'s own facilities. Please provide a breakdown of each cost component (*e.g.*, investment-related costs, network operations, maintenance, and SG&L) that is part of the average total cost per line, identifying the type and amount of each cost. If costs differ depending on the type of business customer (small vs. large), please provide the total cost and the breakdown of costs by type of business customer. Please identify how your company defines "small" and "large" business customers.

Please produce all documents that reflect, refer or relate to the information provided in your response to this request.

10. Please provide all documents that summarize or otherwise reflect the financial results of [company's] CLEC operations in [state] in each of the past two years.

11. Please identify all rate plans that [company] offers in [state], and list all components (including vertical features) of the rate plans that [company] offers to businesses and all the components of the rate plans that [company] offers to residential customers. In addition, please produce all documents that describe the rate plans [company] offers in [state].

12. Please state whether [company] alleges that Qwest has performed deficiently in providing [company] with hot cuts, collocation, provisioning of loops, provisioning of transport, CLEC-to-ILEC cross connects, or CLEC-to-CLEC cross-connects in [state] at any time since June 2001. For any such allegations, please provide a complete description of all facts that [company] relies upon, and produce all documents that relate in any way to the allegation.

13. Please state whether [company] has any business plans to begin providing local exchange service in areas of [state] where it does not currently provide such service. If [company] has such plans, please identify the new areas where it intends to provide service, and produce all documents that refer or relate to [company]'s plans to expand into these new areas.