

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

**Petition of Qwest Corporation to Initiate a Mass-Market Switching and Dedicated
Transport Case Pursuant to the Triennial Review Order
Docket No. U-033044
Sprint's Response to Commission Bench Request No. 32**

BENCH REQUEST NO. 32:

Describe the hot cut process currently used to transfer lines from Qwest switches to your facilities.

Date Prepared: 10/30/03

Preparer & Phone Number: John Felz 913.315.9238

Witness:

Sprint does not currently use a hot cut process to transfer lines from Qwest.

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Docket No. U-033044
Sprint's Response to Commission Bench Request No. 33**

BENCH REQUEST NO. 33:

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

- (a) the average time it takes to complete the task;
- (b) the typical occurrence of the task during the process;
- (c) the labor rate for the task; and
- (d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

Date Prepared: 10/30/03

Preparer & Phone Number: John Felz 913.315.9238

Witness:

Not Applicable, see response to question 32.

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Docket No. U-033044
Sprint's Response to Commission Bench Request No. 34**

BENCH REQUEST NO. 34:

Describe a batch hot cut process that you would implement to meet the FCC's requirement to establish a batch hot cut process. Please include an estimate of the maximum number of lines that should be processed in each batch.

Date Prepared: 10/30/03

Preparer & Phone Number: John Felz 913.315.9238

Witness:

Sprint takes no position on these issues at this time.

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Docket No. U-033044
Sprint's Response to Commission Bench Request No. 35**

BENCH REQUEST NO. 35:

Please list each task that is part of the batch cut process described in your response to Bench Request No. 35, above. For each task, please provide the following information:

- (a) the average time it takes to complete the task;
- (b) the typical occurrence of the task during the process;
- (c) the labor rate for the task; and
- (d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

Date Prepared: 10/30/03

Preparer & Phone Number: John Felz 913.315.9238

Witness:

Not applicable, see response to question 34

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Sprint's Response to Commission Bench Request No. 36**

BENCH REQUEST NO. 36:

Beginning on January 1, 2003, please provide the average total cost per line that you incurred to manage and participate in Qwest's hot cut process, including, but not limited to, Qwest's non-recurring charges, for lines used to service residential and business mass-market customers in Qwest's service territory within Washington State. If the average total cost per line discussed above is different for residential and business mass-market customers, please identify the average total costs separately.

Date Prepared: 10/30/03

Preparer & Phone Number: John Felz 913.315.9238

Witness:

Not applicable, see response to question 32

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Sprint's Response to Commission Bench Request No. 37**

BENCH REQUEST NO. 37:

If the Commission determines that competitive carriers are not impaired without access to switching in the mass-market, please identify, by Qwest wire center in Washington State, what monthly volumes of hot cuts would be required within the first 12 months after the effective date of the decision: (a) to migrate existing UNE-P customers to UNE-L or another form of service, and (b) to connect new customers in the ordinary course of business. Please provide supporting documentation for these volume estimates.

Date Prepared: 10/30/03

Preparer & Phone Number: John Felz 913.315.9238

Witness:

Sprint takes no position on this issue at this time.

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Sprint's Response to Commission Bench Request No. 38**

BENCH REQUEST NO. 38:

Please describe any circumstances in which you believe Qwest has performed deficiently in providing you with hot cuts in Washington State since January 1, 2003. Please provide a complete description of all facts that you rely upon as well as documents that support your assertion.

Date Prepared: 10/30/03

Preparer & Phone Number: John Felz 913.315.9238

Witness:

Not applicable, see response to question 32.