

WUTC Docket No. UT-083041
Charter Responses to Qwest First Data Requests
October 31, 2008

Data Request No. 2:

On page 6, lines 17-20 Mr. Gates states that Qwest's proposed language would require Charter to build additional facilities. Please describe the additional facilities that would be required and the specific language that would require the building of such facilities.

Response:

All general objections and all objections to definitions and instructions are incorporated into the specific objection regarding this Request. Subject to and without waiving these objections, Charter responds as follows: Charter has not performed a detailed analysis of the interconnection facility arrangements that would be required under Qwest's proposed language for the state of Washington. Generally speaking, and only as examples, Charter could be required to build additional facilities pursuant to Qwest's proposed language in § 7.1.2, which could require Charter to establish more than one POI per LATA and construct those facilities, and pursuant to Qwest's proposed language in § 7.1.2.3 limiting Qwest's mid-span meet requirements to Qwest's Serving Wire Center boundaries, which could force Charter to build additional facilities from its preferred meet point location within a given LATA to a specific serving wire center.

Prepared by: Counsel (objections); Bill Pruitt
Date: October 31, 2008