

**COVAD COMMUNICATIONS COMPANY'S RESPONSE
TO COMMISSION BENCH REQUESTS NOS. 32 - 38**

RE: In the Matter of the Petition of Qwest Corporation to Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order, Docket No. UT-033044.

PART B. QUESTIONS FOR PARTIES OTHER THAN QWEST:

BENCH REQUEST NO. 32:

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

COVAD'S RESPONSE TO NO. 32:

Covad provides only xDSL service to its end user customers. It does not provide any voice services to end users. Consequently, Covad does not have any lines appearing on Qwest switches. However, through partnering arrangements with voice CLECs, Covad provides data services to the customers of those voice CLECs via a UNE-P arrangement. In other words, Covad shares loops with voice providers and uses the High Frequency Portion of the Loop (HFPL) with UNE-P providers whose lines appear on Qwest switches. Consequently, while Covad does not have a direct need to "transfer lines from Qwest switches" (as does the UNE-P provider), it does have a vested interest in having a hot cut process in place that will allow its data customers, who may be a voice customer of a UNE-P provider, to be migrated without service interruption. Without a seamless hot cut process, both Covad and the UNE-P provider will be placed at a competitive disadvantage vis-à-vis the acquisition and retention of end user customers seeking bundled voice and data service offerings from CLECs.

Prepared by: Mike Zulevic, telephone no. 720-208-2423, Date: November 3, 2003

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.

COVAD'S RESPONSE TO NO. 33:

Please note that the hot cut process that is described below only pertains to 2nd line (non-shared loops) migration (for purposes of providing data service) as Covad is not aware of any hot cut process available for migrating services such as Line Splitting.

1. Covad places the Local Service Request with Qwest and requests a due date five (5) business days out along with an appointment time.
2. Qwest calls Covad's test and acceptance group on the due date (usually at the appointment time) and if Covad receives successful test results, Qwest completes the handoff to Covad.
3. If Covad does not get successful test results and it's Qwest's issue, Qwest is responsible for resolving the issue and calling Covad back for testing. Generally Qwest calls Covad back within the same day. If it is a Covad issue, Covad opens a N5 ticket to have a Trans Tech dispatched to the CO. This usually occurs within 48 hours. Once the Trans Tech resolves the issue, Covad's provisioning group places a supplemental loop order requesting a new due date. Covad then starts over at Step 2.
4. If the test results were successful, then a Covad install is scheduled, at which time a Covad Field Tech will go to the premises to complete the install (time frame for Covad installations varies).

Prepared by: Sandra Caron, telephone no. 720-208-3546, Date: October 30, 2003

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.

COVAD'S RESPONSE TO NO. 34

Covad does not have a batch hot cut process for migrations. However it is critical that any process that is developed include the migration of both voice and data services, if applicable.

Prepared by: Sandra Caron, telephone no. 720-208-3546; Date: October 30, 2003

Mike Zulevic, telephone no. 720-208-2423; Date: November 3, 2003

BENCH REQUEST NO. 35:

Please list each task that is part of the batch cut process described in your response to Bench Request No. [34], 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.

COVAD'S RESPONSE TO NO. 35

See Response to Bench Request Nos. 32 and 33.

Prepared by: Sandra Caron, telephone no. 720-208-3546, Date: October 30, 2003

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.

COVAD'S RESPONSE TO NO. 36

Covad has no information responsive to this Request. See Response to Bench Request Nos. 32 and 33.

Prepared by: Mike Zulevic, telephone no. 720-208-2423, Date: November 3, 2003

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.

COVAD'S RESPONSE TO NO. 37

Covad has no information responsive to this Request. See Response to Bench Request Nos. 32 and 33.

Prepared by: Mike Zulevic, telephone no. 720-208-2423, Date: November 3, 2003

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.

COVAD'S RESPONSE TO NO. 38

Covad has no information responsive to this Request. See Response to Bench Request Nos. 32 and 33.

Prepared by: Mike Zulevic, telephone no. 720-208-2423, Date: November 3, 2003