

Exhibit MS-3

Qwest Iowa Response to
Qwest Data Request No. 3

Therefore, Qwest will provide as its response to both Request No. 2 and 8(b) documentation reflecting power usage monitoring performed pursuant to the DC Power Measuring Amendment at issue in this proceeding, for McLeodUSA collocation sites only.

Request 3: Please provide electronic, fully executable copies of Qwest cost studies, and supporting documentation, supporting all collocation rates found at Section 8 of Exhibit A to the Qwest and McLeodUSA interconnection agreement.

Response:

Qwest objects to this request because it seeks information that is reasonably calculated to lead to the discovery of relevant or admissible evidence only as to its challenge to the Board-approved rate for the rate element DC Power Plant. This request is not reasonably calculated to lead to the discovery of relevant or admissible evidence concerning the interpretation of the DC Power Measuring Amendment at issue in this case. This request's lack of relevance to the billing dispute is compounded by the fact that the information requested is extremely confidential trade secret information of Qwest detailing its costs and facility configuration and capabilities, and providing that information to McLeodUSA, a direct, facilities-based competitor, would place Qwest at a competitive disadvantage. Qwest has moved to dismiss McLeodUSA's objection to the DC Power Plant rate, as it is improperly raised in this docket. Qwest objects to responding to this discovery request until the Board rules on its motion to dismiss.

Request 4: Please identify each circumstance to-date wherein a McLeodUSA collocation order required Qwest to invest in additional equipment or augment existing equipment relative to the equipment types listed below.