## Joint CLEC Proposed Follow-Up Data Requests

## Qwest

- 1. Regarding the following six wire centers identified by CLLI: KENTWAOB, OLYMWA02, STTLWA06, BLLVWAGL, STTLWACH, TACMWAFA, please provide the following line count information as of March 2005. If March 2005 data is not available, please provide this information for the most recent time period prior to March 2005 and the most recent time period after March 2005 for which the data is available:
  - (a) Total number of business lines as defined in 47 C.F.R. § 51.5, such as was provided for December 2003 in BCH 01-003 Confidential Attachment B.
  - (b) Total ILEC business switched access lines, such as was provided for December 2003 in BCH 01-003 Confidential Attachment C.
  - (c) Data, as were provided for December 2003 in BCH 01-003 Confidential Attachment D, so that the information provided in (b) can be reconciled with the methodology used to count this data for ARMIS.
  - (d) Number of UNE loops for each CLEC, where the ILEC does not provide switching, as was reported for December 2003 in response BCH 01-002 Attachment C.
  - (e) The number of UNE Loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement) as was reported for December 2003 in response to BCH 01-002 Attachment D.
  - (f) If the data above is reported in a manner different from how Qwest reported the data for December 2003, please explain and provide all information and data necessary to reconcile the different methodologies.
  - (g) If Qwest is unable to break down business UNE-P line count data by CLEC, provide total line count data, for each CLEC.
- 2. Please describe any effort Qwest made to remove residential line counts from the CLEC UNE loop data, including but not limited to the number of residential lines removed and how Qwest determined that the lines were residential lines. If Qwest did not remove residential lines from the UNE loop data, please explain why not and provide the number of residential lines that Qwest included within the total CLEC UNE loop data.
- 3. Please describe any effort Qwest made to remove non-switched line counts from the CLEC UNE loop data, including but not limited to the number of non-switched lines removed and how Qwest determined that the lines were non-switched lines. If Qwest did not remove non-switched lines from the UNE loop data, please explain why not and provide the number of non-switched lines that Qwest included within the total CLEC UNE loop data.
- 4. As of March 2005 (or the date of the data provided in response to question 1 above, if different), please provide the percentage of the capacity of Qwest's DS1 and DS3 circuits that is actually used to provide switched service to business customers.

5. For any wire center where Qwest relied on the number of fiber-based collocators to determine the wire center nonimpairment classification, please provide all data demonstrating that as of March 11, 2005, each collocator (a) was a fiber-based collocator as of March 11, 2005, and (b) connects its collocated equipment directly to its own fiber-optic network without relying on Qwest UNEs or cross-connects to other collocated carriers.

## Verizon

- 1. For any wire center where Verizon relied upon business line count information in order to determine the wire center Tier, please provide the following line count information as of March 2005. If data as of March 2005 is not available, please provide this information for the most recent time period prior to March 2005 and the most recent time period after March 2005 for which the data is available:
  - (a) Total number of business lines as defined in 47 C.F.R. § 51.5, such as was provided for December 2003 in highly confidential attachment "WA UTC\_Set1\_Attch1\_2-HIGHLY CONFIDENTIAL".
  - (b) Total ILEC business switched access lines, such as was provided for December 2003 in highly confidential attachment "WA UTC\_Set1\_Attch1\_2-HIGHLY CONFIDENTIAL".
  - (c) Number of UNE loops for each CLEC, where the ILEC does not provide switching, as was reported for December 2003 in highly confidential attachment "WA UTC\_Set1\_Attch1\_3-HIGHLY CONFIDENTIAL CODED".
  - (d) The number of UNE Loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement), if not already reported elsewhere.
  - (e) If the data above is reported in a manner different from how Verizon reported the data for December 2003, please explain and provide all information and data necessary to reconcile the different methodologies.
- 2. Please describe any effort Verizon made to remove residential line counts from the CLEC UNE loop data, including but not limited to the number of residential lines removed and how Verizon determined that the lines were residential lines. If Verizon did not remove residential lines from the UNE loop data, please explain why not and provide the number of residential lines that Verizon included within the total CLEC UNE loop data.
- 3. Please describe any effort Verizon made to remove non-switched line counts from the CLEC UNE loop data, including but not limited to the number of non-switched lines removed and how Verizon determined that the lines were non-switched lines. If Verizon did not remove non-switched lines from the UNE loop data, please explain why not and provide the number of non-switched lines that Verizon included within the total CLEC UNE loop data.

- 4. As of March 2005 (or the date of the data provided in response to question 1 above, if different), please provide the percentage of the capacity of Verizon's DS1 and DS3 circuits that is actually used to provide switched service to business customers.
- 5. For any wire center where Verizon relied on the number of fiber-based collocators to determine the wire center nonimpairment classification, please provide all data demonstrating that as of March 11, 2005, each collocator (a) was a fiber-based collocator as of March 11, 2005, and (b) connects its collocated equipment directly to its own fiber-optic network without relying on Verizon UNEs or cross-connects to other collocated carriers.
- 6. For any wire centers where Qwest has identified Verizon as a fiber based collocator, please confirm that Verizon meets the TRRO definition of fiber based collocator in those Qwest offices as of December 2003, March 2005 and July 2005. Please provide this data for both the traditional Verizon collocations and the collocations Verizon obtained in its purchase of MCI.