

1 areas as constituting potential operational impairments: (1) loop provisioning; (2)
2 collocation availability; and (3) the ability to obtain CLEC to CLEC cross connects.¹ On
3 the first point, loop provisioning, Qwest and the CLEC community are engaged in a multi-
4 state forum to consider a Batch Hot Cut Process (“BHCP”). Given that this forum will
5 address this topic, and a separate filing schedule exists for testimony associated with the
6 BHCP, the remainder of my Direct Testimony will consider the remaining two potential
7 operational impairments – collocation and CLEC to CLEC cross connects.

8 As to collocation availability, as of September 30, 2003 CLECs already had ~~503-334~~
9 collocations in the state of Washington. In fact, as of December 12, 2003 there is only
10 one office that does not currently have space available for collocation in Washington, out
11 of 112 offices.² In offices where physical collocation in is not an option at this time, the
12 CLEC would have the ability to order shared, interconnection distribution frame
13 (“ICDF”), or virtual collocation.

14 Moreover, Qwest’s audited performance data shows that Qwest has been providing
15 CLECs with collocation throughout the state of Washington in a timely manner. Qwest
16 also provides CLECs with the ability to obtain prompt CLEC to CLEC cross connects.
17 Qwest’s Washington SGAT provides any carrier that chooses to opt in

¹ TRO at ¶456.

² The central office with space constraint is the Steamboat Island CO, which is actually a remote CO homed off of the Olympia Whitehall CO. The space constraint is expected to be resolved in early 2004. See, <http://www.uswest.com/wholesale/notices/collo/spaceAvail.html>.