BEFORE THE WASHINGTON AND UTILITIES TRANSPORTATION COMMISSION

IN THE MATTER OF THE CONTINUED)	
COSTING AND PRICING OF UNBUNDLED)	Docket No. UT-003013
NETWORK ELEMENTS, TRANSPORT,)	
TERMINATIONS AND RESALE)	Part D
)	

REBUTTAL TESTIMONY

OF

WILLIAM R. EASTON

QWEST CORPORATION

March 7, 2002

I. IDENTIFICATION OF WITNESS

- 2 Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.
- 3 A. My name is William R. Easton. My business address is 1600 7th Avenue, Seattle
- 4 Washington. I am employed as Director Wholesale Advocacy. I am testifying on behalf
- of Qwest Corporation ("Qwest").

6 Q. DO YOU ADOPT THE TESTIMONY FILED BY ROBERT F. KENNEDY IN THIS

7 **PROCEEDING?**

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- 8 A. Yes. I am adopting, in its entirety, the direct testimony of Robert F. Kennedy dated
- November 7, 2001 including the revised pages submitted on December 5, 2001, as well as
- the Supplemental Direct Testimony filed November 30, 2001.

11 Q. HAVE YOU PREVIOUSLY TESTIFIED IN THE STATE OF WASHINGTON?

- 12 A. Yes. I previously testified in the State of Washington in the following dockets: UT-
- 13 940641; UT-950200; UT-951425; and UT-960347.

II. PURPOSE OF TESTIMONY

15 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

- A. My rebuttal testimony will address certain issues presented in the Responsive Testimony of
- 17 Ronald Stanker of AT&T Communications of the Pacific Northwest, Inc. dated December
- 18 20, 2001.

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III. TESTIMONY OF RONALD STANKER

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2	Q.	PLEASE RESPOND TO THE EXPECTATION OF MR. STANKER IN HIS
3		RESPONSIVE TESTIMONY DATED DECEMBER 20, 2001, THAT QWEST
4		WITHDRAW THE TWO MTE NONECURRING CHARGES QWEST PROPOSED
5		IN THIS PROCEEDING. ¹
6	A.	Based on the Administrative Law Judge's (ALJ) decision in the Twentieth Supplemental
7		Order; Initial Order (Workshop 4) dated November 7, 2001, in Docket Nos. UT-
8		003022/UT-003040, Qwest withdraws its request for the two MTE nonrecurring charges.
9		The first nonrecurring charge is the MTE-POI inventory charge and the second is the MTE-
10		POI service order charge with or without dispatch.
11	0	HAC OWEST ASKED THE COMMISSION TO DEVIEW THE AT IS DIT INC
11	Q.	HAS QWEST ASKED THE COMMISSION TO REVIEW THE ALJ'S RULING
12		WITH REGARD TO THE MTE-POI INVENTORY CHARGE?
13	A.	No, Qwest has not challenged the MTE-POI inventory charge.
14	Q.	HAS QWEST ASKED THE COMMISSION TO REVIEW THE ALJ'S RULING
15		WITH REGARD TO THE MTE-POI SERVICE ORDER CHARGE?
16	A.	Yes, Qwest has challenged the Administrative Law Judge's (ALJ) determination that a
17		Local Service Request (LSR) is not required to order the intrabuilding subloop. If the
18		Commission rules in favor of Qwest, Qwest will propose a nonrecurring charge to cover

the cost of processing the LSR in the next phase of this docket.

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1 O. DOES THIS CONCLUDE YOUR TESTI	
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2 A. Yes, this concludes my testimony.

¹ Responsive Testimony of Stanker page 3, lines 16-18: "Accordingly, AT&T expects Qwest to withdraw the two MTE nonrecurring charges that Qwest has proposed in this proceeding."