

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION  
DOCKET NO. UT-100820  
CENTURYLINK RESPONSES TO  
INTEGRA'S FIRST SET OF INFORMATION REQUESTS  
NOS. 1 THROUGH 156**

1. Separately for each state in which Qwest operates as an ILEC, provide the following:
  - a. Number of CLECs who purchase unbundled network elements from Qwest.
  - b. Number of unbundled loops purchased from Qwest. A complete response will provide loop counts separately for voice-grade, DS1 and DS3 loops.
  - c. Number of wholesale platform arrangements (e.g., UNE-P replacement) purchased from Qwest.
  - d. Number of Enhanced Extended Links (EELs) purchased from Qwest separated by capacity (voice-grade, DS1 and DS3).
  - e. Number of CLECs who purchase collocation from Qwest.
  - f. Number of CLEC collocation arrangements purchased from Qwest. A complete response will provide the collocation count separately by collocation type (i.e., caged, cageless and/or virtual).
  - g. Number of resold lines by product type.
  - h. Number of hot cuts performed for the prior year.
  - i. Count of LNP number ports processed by year for the prior five year period.
  - j. Number of CLEC trouble tickets submitted by year for the past 5 year period.
  - k. Number of jeopardy (facilities not found) notices sent to CLECs by year for the past five year period.
  - l. Qwest employee headcount by year for the prior 5 year period.
  - m. Qwest employee headcount, by year for the prior five year period, of employees providing wholesale services.
  - n. Revenues from wholesale services by year for the prior 5 year period.
  - o. Dollar amount of payments made under wholesale performance plans by year for the previous 5 year period.
  - p. Dollar amount of payments made under retail performance plans by year for the previous 5 year period.

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**CenturyLink Response:**

Please see Qwest's response to Integra Request 5.

Sponsor: John Felz, Director Regulatory Operations and Policy

Washington  
UT-100820  
INTEGRA TELECOM 1-1.

INTERVENOR: INTEGRA TELECOM

REQUEST NO: 1

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- n. Revenues from wholesale services by year for the prior 5 year period.
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- p. Dollar amount of payments made under retail performance plans by year for the previous 5 year period.

RESPONSE:

To the extent this request applies to matters other than Washington intrastate operations subject to the jurisdiction of the Commission, Qwest objects to such request as irrelevant, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. To the extent this request seeks information for a five-year time period, Qwest objects to producing the information as overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, see the following responses.

- a. See Confidential Attachment A for the number of CLECs that purchase Unbundled Network Elements in WA.
- b. See Confidential Attachment B.
- c. See Confidential Attachment B.
- d. See Confidential Attachment B. Respondent: Candace Mowers, Staff Advocate, Public Policy
- e. See Confidential Attachment C.
- f. See Confidential Attachment C. Respondent: Cindy Buckmaster
- g. See Confidential Attachment G. Respondent: Candace Mowers; Staff Advocate, Public Policy
- h. There were 7,413 hot cut orders completed in 2009. These volumes reflect

the hot cut orders that Qwest reports under the Washington performance assurance plan.

Respondent: Mike Williams, Director, Public Policy

i. Qwest only has direct access to the port counts that have occurred from 01/01/2010 through 06/30/2010. Without special studies being commissioned prior data is not available. Even with the special study, only 18 months worth of data is available. The total count for all ports (in, out and within Qwest) for the period 1/1/2010 to 6/30/2010 is attached as Confidential Attachment D.

Respondent Karin Fahrenbruch, Lead IT Analyst, Network Services  
Gregory M. Smith, Staff Advocate, Public Policy

j. There were 7,845 CLEC repair tickets in 2008 and 9,248 in 2009. These volumes are based on Qwest reports published under the Washington performance assurance plan, wholesale service quality rules, and the QSLP product in commercial agreements.

Respondent: Mike Williams, Director, Public Policy

k. Qwest does not maintain or report the number of jeopardy notices involving facilities not found. Nevertheless, Qwest does send jeopardy notices for orders delayed for facilities not available, which Qwest does track and report. Accordingly, the number of orders for which jeopardy notices were sent to CLECs for orders delayed due to facilities not being available were 174 in 2008 and 146 in 2009. These volumes are based on Qwest reports published under terms of the Washington performance assurance plan.

Respondent: Mike Williams, Director, Public Policy

l. The following table provides the requested data for Qwest (QCII) headcount.

Qwest (QCII) Employee Headcount by Year

<u>YEAR</u>	<u>WASHINGTON</u>
2005	4,185
2006	3,903
2007	3,752
2008	3,172
2009	2,626

Respondent: Kevin MacWilliams, Lead Finance/Business Analyst, Qwest

m. See Confidential Attachment A.

Respondent: Judy Seals, Lead Finance Business Analyst

n. Please see Confidential Attachment C.

Respondent: Kevin MacWilliams, Lead Finance/Business Analyst, Qwest

o. Dollar Amount of Payments under wholesale performance plans

<u>(\$000s)</u>	<u>Washington</u>
2005	1,243
2006	820

2007	1,122
2008	294
2009	629

Respondent: Mike Williams, Director Legal Issues, Public Policy  
p. Dollar Amount of Payments to Customers for Retail Performance

(\$000s)	Washington
2005	850
2006	252
2007	123
2008	97
2009	95

Respondent: Mike Williams, Director Legal Issues, Public Policy

Washington  
 Docket No. UT-100820  
 Integra Set 1 No 001(m)  
 CONFIDENTIAL Attachment A

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1														
2														
3														
4														
5														
6														
7														
8	2005		Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
9			1,143	1,136	1,131	1,106	1,096	1,081	1,075	1,074	1,069	1,068	1,054	1,034
10	2006		1,022	1,014	1,013	1,013	1,001	994	988	983	984	982	987	984
11	2007		985	978	974	971	967	951	940	928	931	926	923	912
12														
13														
14	2008		919	921	920	920	918	911	906	904	903	907	907	909
15														
16	2009		913	912	912	914	896	896	886	851	844	843	809	747
17														
18	2010		744	742	740	736	737	735						

WUTC Docket No. UT-100820  
CROSS-EXHIBIT1-MSR-JCX

**REDACTED**

Confidential INTEGRA SET 1, NO 1.a. – NO 1.d. & NO 1.g.