

Response Date: February 2, 2004
Docket No.: UT-033044
Requestor: Joint CLECs
Respondent: Z6
Responses to: Subpoena Decus Tecum, dated January 12, 2004

JCLEC 01-001:

Does Z6 have transport facilities in Washington that it offers on a wholesale basis to other carriers?

Z6 RESPONSE TO REQUEST JCLEC 01-001:

Z6's local network architecture in Washington State does not match what the FCC defined as a "transport route" – i.e., a transmission path between two ILEC wire centers, because Z6's local network architecture is very different than the traditional network design. The primary engineering and design principles underlying Z6's local fiber transmission networks is to focus traffic from its customer locations into its nationwide and global backbone networks, meaning that Z6 has no reason to replicate the functionality provided by the ILECs' networks. Z6 further states that its product offerings for use by its customers make use of Z6's network facilities of all types, including transmission facilities in Washington State, and certain of those offerings include DS1 and DS3 capacity levels which would be available anywhere Z6 is collocated.