

Washington
UT-053025
Joint CLECs 01-001

INTERVENOR: Covad Communications Co., Eschelon Telecom of Washington, Inc.,
Integra Telecom of Washington, Inc., McLeodUSA Telecomm. Services, Inc., and
XO Comm. Services

REQUEST NO: 001

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.

RESPONSE:

Qwest objects to this data request on the basis that the data requested is
not relevant to the inquiry or issues in this case. The TRRO supports the
use of the 2003 ARMIS data relied upon by Qwest. See also, Qwest's February
28, 2006 Responses to the Commission's Bench Requests and Qwest's Responses
to the Joint CLECs' exceptions in this docket, filed today.

Respondent: Qwest Legal

Washington
UT-053025
Joint CLECs 01-002

INTERVENOR: Covad Communications Co., Eschelon Telecom of Washington, Inc.,
Integra Telecom of Washington, Inc., McLeodUSA Telecomm. Services, Inc., and
XO Comm. Services

REQUEST NO: 002

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.

RESPONSE:

Qwest did not make any effort to remove residential line counts from UNE loop counts, as such removal was not required by the TRRO. See, 47 C.F.R. § 51.5. See also, Qwest's February 28, 2006 Responses to the Commission's Bench Requests and Qwest's Responses to the Joint CLECs' exceptions in this docket, filed today.

Respondent: Qwest Legal

Washington
UT-053025
Joint CLECs 01-003

INTERVENOR: Covad Communications Co., Eschelon Telecom of Washington, Inc.,
Integra Telecom of Washington, Inc., McLeodUSA Telecomm. Services, Inc., and
XO Comm. Services

REQUEST NO: 003

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.

RESPONSE:

Qwest did not make any effort to remove non-switched line counts from the UNE loop counts, as such removal was not required by the TRRO. See, 47 C.F.R. § 51.5. See also, Qwest's February 28, 2006 Responses to the Commission's Bench Requests and Qwest's Responses to the Joint CLECs' exceptions in this docket, filed today.

Respondent: Qwest Legal

Washington
UT-053025
Joint CLECs 01-004

INTERVENOR: Covad Communications Co., Eschelon Telecom of Washington, Inc.,
Integra Telecom of Washington, Inc., McLeodUSA Telecomm. Services, Inc., and
XO Comm. Services

REQUEST NO: 004

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.

RESPONSE:

Qwest objects to this data request on the basis that the data requested is
not relevant to the inquiry or issues in this case. The TRRO supports the
use of the 2003 ARMIS data relied upon by Qwest. See also, Qwest's February
28, 2006 Responses to the Commission's Bench Requests and Qwest's Responses
to the Joint CLECs' exceptions in this docket, filed today.

Respondent: Qwest Legal

Washington
UT-053025
Joint CLECs 01-005

INTERVENOR: Covad Communications Co., Eschelon Telecom of Washington, Inc.,
Integra Telecom of Washington, Inc., McLeodUSA Telecomm. Services, Inc., and
XO Comm. Services

REQUEST NO: 005

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.

RESPONSE:

Qwest objects to this data request on the basis that the data requested is not relevant to the inquiry or issues in this case. The TRRO supports the use of the 2003 ARMIS data relied upon by Qwest. See also, Qwest's February 28, 2006 Responses to the Commission's Bench Requests and Qwest's Responses to the Joint CLECs' exceptions in this docket, filed today.

Respondent: Qwest Legal