

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

| | | |
|---|---|-----------------------------|
| In the Matter of the Petition |) | |
| Of Qwest Corporation |) | DOCKET NO. UT-000883 |
| For Competitive Classification of Business |) | |
| Services in Specified Wire Centers |) | |

REBUTTAL TESTIMONY

OF

DAVID L. TEITZEL

DIRECTOR – PRODUCT AND MARKET ISSUES

QWEST CORPORATION

OCTOBER 6, 2000

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, TITLE AND ADDRESS.
My name is David L. Teitzel. I am employed by Qwest Corporation as Director - Product and Market Issues. My business address is 1600 7th Avenue, Room 2904, Seattle, Washington, 98191.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS CASE?
A. Yes. I filed Direct testimony on August 11, 2000.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?
A. The purpose of my testimony is to address and respond to various issues raised by intervening parties in this docket, including: Dr. Glenn Blackmon, Washington Utilities and Transportation Commission (WUTC) Staff; Don Wood, Advanced TelCom Group, Inc. (ATG) and MetroNet Services Corporation; Ron Davis, Eschelon Telecom, Inc.; and Dr. Sarah Goodfriend, Public Counsel and TRACER.

II. RESPONSE TO DR. GLENN BLACKMON'S TESTIMONY

Q. DR. BLACKMON STATES THAT THERE IS NO EVIDENCE TO SUGGEST THAT SMALL BUSINESS CUSTOMERS HAVE ALTERNATIVES TO QWEST'S BUSINESS SERVICES. DO YOU

1 **AGREE?**

2 A. No. The very fact that companies such as Eschelon and ATG have intervened in
3 this proceeding suggests otherwise. As Mr. Ron Davis testifies for Eschelon, his
4 company primarily targets “small and medium sized business customers” (Davis,
5 page 2, lines 3 to 4). ATG’s Internet web site promotes the company as bringing
6 “small and medium-sized businesses, home offices, and telecommuters state-of-the-
7 art technology” ... and claims ATG is the “new local telephone and Internet
8 company” (see Exhibit DLT-4 for Internet web page).

9

10 Teligent, another business competitor, affirms they are also serving the small
11 business market in a recent company press release:

12 Since it initiated local, long distance, high speed data and broadband
13 Internet services on October 27, 1998, Teligent has brought “Big
14 Bandwidth, Big Service and Big Savings” to small and medium sized
15 businesses in 40 markets throughout the United States.

16

17 (See Exhibit DLT-5 for copy of the December 20, 1999 press release.)

18

19 Seattle is one of the markets Teligent serves. Exhibit DLT-6 contains recent
20 advertisements Teligent ran in Seattle area publications.

21

22 Sprint offers its ION integrated local/long distance service offering to small
23 business customers in Seattle, according to the carrier’s Internet web site,

24 www.sprintbiz.com. A description of the ION offering for small business

1 customers is included as Exhibit DLT-7.

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3

On July 31, 2000, the WUTC issued

4

an order in Docket UT-001038,

5

approving IPVoice Communication's

6

petition to be classified as a

7

competitive telecommunications

8

company in Qwest and GTE

9

(Verizon) exchanges in Washington.

10

Qwest exchanges include those

11

identified in Qwest's petition in this

12

docket. IPVoice is competing

13

directly with Qwest for a number of

14

services, including those targeted to

15

small business customers such as flat

16

and measured business access lines.

17

In the Order which is attached hereto

18

as Exhibit DLT-8, the Commission

19

found that "alternative providers of

20

service to that of IPVoice include,

21

but are not limited to, Qwest

1 Corporation, Verizon Northwest,
2 MCI WorldCom Communications,
3 and Sprint Communications.” The
4 Commission went on to state:

5 All services are fully available from alternative providers in the
6 relevant market

7
8 (Order, page 3, paragraph 5.)
9

10 The Commission then concluded that the relevant market is the state of Washington
11 and that IPVoice has no captive customer base and should therefore be permitted to
12 provide services under price list (see Order, page 3, paragraphs 6, 7, and 8).

13
14 These are just a few examples of the competition that exists for small business
15 services. The list of alternative providers serving small and medium sized business
16 customers expands continually. For example, SBC Communications announced on
17 September 29, 2000 that it will begin offering local and long distance services
18 starting in October, 2000 to “mostly small and mid-sized businesses” in Seattle (see
19 Exhibit DLT-9 for news article from The Seattle Times Knight Ridder/Tribune
20 Business News).

21
22 This evidence demonstrates that the small business market is subject to competition
23 and as such, the services contained in Qwest’s Petition should be reclassified as

1 “competitive.”

2

3 **Q. DO YOU HAVE ADDITIONAL INFORMATION TO SUPPORT YOUR**
4 **CONTENTION THAT THE SMALL BUSINESS MARKET IS**
5 **EXPERIENCING COMPETITION?**

6 A. Yes. I filed Exhibit DLT-2C to my Direct testimony which demonstrates that
7 Qwest has lost small business customers to competitors in Washington. That data
8 was based on the number of billed telephone numbers disconnected for competitive
9 reasons, as self-reported by the customer disconnecting service. In addition, Qwest
10 responded to WUTC data request 01-001, indicating that as of May 2000, 24,329
11 small business lines and 7,537 large business lines had been lost to competitive
12 providers. Information as of August 2000 indicates the number of small business
13 losses to competitors has jumped to 50,552 small business lines. (I discuss large
14 business line losses later in this testimony.) As this information reflects only those
15 lines disconnected by customers who indicate they are leaving Qwest to go to a
16 competitor, the numbers are understated. They do not reflect competitive
17 disconnects that are not reported by customers, nor do they reflect lines obtained
18 from Qwest’s competitors which were never Qwest lines.

19

20 **Q. DID THE DATA GATHERED BY MS. BHATTACHARYA FROM THE**
21 **CLECS FOR THE COMMISSION STAFF DIFFERENTIATE BETWEEN**

1 SMALL BUSINESS AND LARGE BUSINESS ACCESS LINES?

2 A. No. Exhibit GB-3 of Ms. Bhattacharya's testimony includes a footnote that
3 indicates the figures showing percentages of business access lines by location on the
4 exhibit do not separately identify large versus small business access lines because
5 "such information could not be adequately provided to the Commission."
6 Therefore, it can reasonably be concluded that the data on Ms. Bhattacharya's
7 exhibit is reflective of both markets.

8

9 **Q. DR. BLACKMON SURMISES THAT A MINORITY OF BUSINESS**
10 **CUSTOMERS PURCHASE A MAJORITY OF BUSINESS LINES. DO YOU**
11 **HAVE DATA TO SUPPORT HIS SUPPOSITION?**

12 A. Yes, Dr. Blackmon is correct. Specifically for Qwest, 20% of Qwest Business
13 accounts generate 87.3% of business revenue. 60.5% of business lines in
14 Washington are small business lines.

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III. RESPONSE TO RON DAVIS' TESTIMONY

Q. WHAT IS THE PRIMARY ISSUE ADDRESSED BY RON DAVIS IN HIS TESTIMONY FOR ESCHELON?

A. Eschelon objects to Qwest contract provisions, including the length of the contracts and termination liability penalties.

Q. IS THIS PROCEEDING THE APPROPRIATE VENUE FOR ADDRESSING THIS ISSUE?

A. No. The Commission has already addressed this issue in a separate proceeding, Docket UT-991476. On November 15, 1999, the WUTC denied a petition filed by several competitive local exchange carriers, requesting the Commission adopt a rule to allow customers of incumbent local exchange carriers to terminate contracts without paying cancellation fees provided for in the contracts. The Staff's recommendation to the Commission, as well as the summary of the Commission decision, found at www.wutc.wa.gov, are attached to my testimony as Exhibit DLT-10. Hence, Eschelon's attempt to have the Commission revisit the issue in this proceeding and thereby exert leverage over Qwest's use of its existing contracts should be dismissed.

1 **IV. RESPONSE TO DON WOOD'S TESTIMONY**

2

3 **Q. ON PAGE 4 OF HIS TESTIMONY, MR. WOOD MAKES ALLEGATIONS**
4 **THAT THE COMMISSION MUST DETERMINE PROPER COST**
5 **STANDARDS BEFORE APPROVING THIS PETITION. DO YOU**
6 **AGREE?**

7 **A.** I agree that the Commission must examine whether prices are sufficient to cover
8 cost when it considers Qwest's petition. Indeed, this Commission has approved
9 several petitions for competitive classification of services pursuant to RCW
10 80.36.330 and WAC 480-120-022, and has relied on the cost studies on file with
11 the Commission which support existing rates.¹ As Qwest is not proposing rate
12 changes in this proceeding, the existing rates that are currently supported by cost
13 studies on file with the Commission should become the price listed rates should
14 this Petition be approved. Any future changes to rates will be supported by a
15 demonstration that the proposed rates are above cost. Nothing further is required.

16

17 **Q. MR. WOOD STATES ON PAGE 8, LINES 8 to 9 OF HIS TESTIMONY**
18 **THAT IF PRICING FLEXIBILITY IS DELAYED LONGER THAN**
19 **NECESSARY, CONSUMERS AND COMPETITORS WILL BE**

¹ For example, refer to Commission Order in Docket No. UT-990021, Qwest's Petition to have its intraLATA toll services classified as competitive, Paragraph II (4), January 27, 1999.

1 **UNAFFECTED AND QWEST WILL SUFFER SOME HARM. IS THIS AN**
2 **APPROPRIATE ASSESSMENT?**

3 A. No. If Qwest is denied the ability to compete on more equal footing with its
4 competitors, competition will be harmed and consumers will suffer by having the
5 fruits of full competition such as innovations, technological advancements and
6 increased focus on consumer demands denied them. I am not aware of any
7 provision or condition in state or federal statutes which indicate Qwest must
8 suffer some harm before it can be granted regulatory freedoms based on the
9 existence of competition. I don't believe that was the intent of this Commission,
10 and certainly not of Congress when it passed the Telecommunications Act of 1996
11 (Act) which opened up the local market to competition.

12

13 **Q. THROUGHOUT HIS TESTIMONY, MR. WOOD IMPLIES THAT**
14 **QWEST HAS A COMPETITIVE ADVANTAGE BECAUSE OF ITS**
15 **PROVISION OF WHOLESALE SERVICES TO COMPETITORS. IS**
16 **THAT THE CASE?**

17 A. Definitely not. Retail marketing personnel are not allowed access to carrier
18 wholesale data, therefore, they are not able to develop marketing strategies to
19 preempt competitors' plans or take any other action to inappropriately
20 disadvantage Qwest's retail competitors. Qwest has internal policies that prohibit
21 the sharing of carrier-specific information between its wholesale and retail

1 divisions, and complies fully with 47 USC 222(b). In the immediate proceeding,
2 no retail market employees have reviewed or used carrier-specific wholesale
3 information.

4

5 **Q. MR. WOOD CONTENDS THAT DEFINING THE MARKET AT THE**
6 **WIRE CENTER LEVEL, AS QWEST HAS DONE, IS OVERLY BROAD.**
7 **PLEASE COMMENT.**

8 A. Qwest used wire centers as the basis for its petition because it tracks data at the
9 wire center level and could therefore provide a more accurate view of the
10 competition that is occurring to the Commission. I don't agree that defining the
11 market at the wire center level is overly broad. To more narrowly define it, say at
12 the street level or block level, would be administratively onerous, especially as
13 technology enables competitors to rapidly expand service into new areas. Qwest
14 would be before the Commission on a weekly basis if it had to document the
15 competition for business services at a sub-wire center level. Furthermore, as Staff
16 found when surveying CLECs in this proceeding, CLECs do not maintain data at
17 the wire center level. Staff had to aggregate it to the exchange level. To analyze
18 the market below the wire center level would not lead to any meaningful
19 conclusions, as CLECs do not manage to that level. Finally, as I alluded to
20 earlier, the Commission, in its order approving IPVoice's petition to become a
21 competitive telecommunications provider, defined the market as the entire state.

1 IPVoice is offering business services in every Qwest exchange. Hence, it appears
2 the Commission takes a broad view of the market, versus the more narrow view
3 supported by Mr. Wood in his testimony.

4

5 **AT PAGE 17 OF HIS TESTIMONY, MR. WOOD RECOMMENDS THE**
6 **COMMISSION DISREGARD RESALE AS A COMPETITIVE**
7 **ALTERNATIVE FOR THE PURPOSES OF THIS PROCEEDING**
8 **BECAUSE “RESALE COMPETITION OFFERS NO PROTECTION**
9 **AGAINST EXCESSIVE RATES.” IS HE CORRECT?**

10 A. No. Mr. Wood bases his entire conclusion on the dynamics of resale, which
11 provides resellers of Qwest services in Washington a discount from standard
12 business retail rates. Certainly, resale of Qwest services is a means of competitive
13 entry with minimal capital investment. Additionally, resellers of services such as
14 Centrex are able to create additional margins by contracting with alternative long
15 distance providers to gain volume discounts on toll services which can be passed
16 on, at least in part, to the reseller’s customers. Mr. Wood is incorrect if he
17 believes the wholesale discount defines the entirety of resale competitive
18 dynamics. Resale competition creates market based pricing constraints on
19 Qwest’s pricing in Washington.

20

21 I also find it ironic that Mr. Wood would like the Commission to ignore resale
22 when analyzing competitive alternatives available in the marketplace, yet he has
23 no qualms about asking for protection for his reseller clients in this very

1 proceeding. On page 17, lines 18 to 20 of his testimony, Mr. Wood states:

2

3 For this reason alone, the resale competition data provided by Qwest in
4 this proceeding, even if verified, should not be used by the
5 Commission in any way.

6

7 Then on page 40, lines 14-15, he makes this statement:

8

9 Specific requirements should be applied to ensure that resale remains
10 available as a source of competitive alternatives for consumers and as
11 an entry vehicle for competitors.

12

13 It seems Mr. Wood and his clients, whom he admits are Centrex resellers (page
14 19, line 17), would like it both ways. They want the advantages resale affords in
15 the manner of discounted pricing, yet they don't want the fact that they and others
16 are using resale to compete with Qwest to be used by the Commission in assessing
17 the extent of competition. The Act established resale as a means of opening up
18 the local market to competition; it is therefore appropriate to include it when
19 analyzing how competitive that market has become.

20

21 **Q. MR. WOOD MAKES THE STATEMENT ON PAGE 19, LINE 11, THAT**
22 **RESELLERS ARE "CAPTIVE CUSTOMERS OF QWEST." HOW DO**
23 **YOU RESPOND TO THAT STATEMENT?**

24 **A.** I disagree. Resale is just one of many options available to competitive local
25 exchange carriers. Such carriers may elect to purchase UNE-P from Qwest, lease
26 facilities from other providers, or place their own facilities. Indeed, Qwest's
27 experience in other states indicates that carriers may choose to utilize resale as the

1 most expeditious, cost-effective method of entering a market, but once a
2 significant customer base is captured, transfer service to the CLEC's own
3 facilities. Resellers are not captive customers of Qwest.

4

5 **Q. WOULD GRANTING QWEST'S PETITION EFFECTIVELY "REDLINE"**
6 **COMPETITION, AS MR. WOOD ALLEGES ON PAGE 36, LINES 22 to 23**
7 **OF HIS TESTIMONY?**

8 A. No. Allowing Qwest the flexibility it seeks in this docket will stimulate
9 competition. Rather than being hindered by a thirty-day notice requirement,
10 Qwest will be able to respond more quickly to the market, which will, in turn,
11 cause its competitors to be more responsive to the market. Consumers will be the
12 overall beneficiaries if Qwest is allowed the flexibility it seeks.

13

14 **Q. MR. WOOD ARGUES, AT PAGE 35, LINES 2 to 5, THAT QWEST CAN**
15 **CREATE A "PRICE SQUEEZE" ON ITS COMPETITORS BY**
16 **CONTROLLING THE COST INCURRED BY THE RESELLER AND THE**
17 **PRICE FOR THE RETAIL SERVICE. IS THIS ACCURATE?**

18 A. No. The key assumption behind Mr. Wood's contention is that Qwest's wholesale
19 services continue to be considered "essential" to Qwest's competitors. However,
20 to the extent the Commission agrees that competition is now present in the wire
21 centers for the business services for which Qwest seeks competitive classification,
22 the wholesale elements corresponding to those services can no longer be
23 considered "essential" elements. In determining a price floor for a retail service
24 based on nonessential elements, the TSLRIC of the service is considered to be that

1 floor. Qwest commits that the revenues for any service classified as competitive
2 will remain above the TSLRIC of that service. If the Commission finds that
3 Qwest has violated that commitment, it will have the continued authority to
4 reclassify services in question as non-competitive, which would also modify the
5 imputation test to require that the price for essential wholesale elements and the
6 TSLRIC for non-essential elements must be incorporated into the price floor.
7

8 **V. RESPONSE TO DR. SARAH GOODFRIEND'S TESTIMONY**

9
10 **Q. DR. GOODFRIEND MAINTAINS THAT QWEST HAS A MONOPOLY**
11 **FOR CERTAIN PRODUCTS REFERENCED IN ITS PETITION. ARE**
12 **THERE ANY PRODUCTS ON ATTACHMENT A OF QWEST'S PETITION**
13 **THAT QWEST'S COMPETITORS ARE NOT OR COULD NOT BE**
14 **OFFERING IF THEY CHOSE TO DO SO?**

15 A. No. I do not agree with Dr. Goodfriend that CLECs are unable to duplicate
16 products Qwest has specified be classified as competitive in this proceeding.
17 Qwest's competitors use central office switches which allow them to provision the
18 same or substitutable services as what is listed on Attachment A to the Petition.
19 Attachment B to Qwest's Petition demonstrates, for example, that competitors such
20 as ELI, NEXTLINK, and WorldCom are offering Centrex-type services, which Dr.
21 Goodfriend identifies as a "monopoly" service. CustomChoice, another service Dr.
22 Goodfriend indicates CLECs are not able to duplicate, is a package consisting of a

1 line and several features. Qwest's competitors have the option of packaging
2 services; in fact, they are able to do so on a more extensive basis than Qwest is, due
3 to their ability to package local, intraLATA, *and* interLATA long distance services
4 into one integrated offering. Qwest does not have a monopoly on any of the
5 services listed on Attachment A to the Petition.

6

7 **Q. DR. BLACKMON AND DR. GOODFRIEND APPEAR TO BE AT ODDS**
8 **CONCERNING THE COMPETITION QWEST IS EXPERIENCING IN THE**
9 **BUSINESS MARKET. PLEASE COMMENT.**

10 A. As indicated earlier, Dr. Blackmon fails to recognize the competition Qwest is
11 experiencing in the *small* business market. Conversely, Dr. Goodfriend fails to
12 recognize the competition Qwest is encountering in the *large* business market
13 (Goodfriend, page 29, lines 5 to 6). In actuality, Qwest is experiencing competition
14 in both markets. As of August, 2000, Qwest has lost over 8,400 large business lines
15 to competitors in Washington. The count reflects only those losses Qwest has been
16 able to identify, through self-reporting of the disconnecting customer. As explained
17 previously, this can only be construed as a subset of the entire universe of losses
18 Qwest has experienced, since it does not reflect those lines disconnected without the
19 subscriber identifying they were obtaining service from a competitor; nor does it
20 reflect lines Qwest never served initially. Recent losses include a national real
21 estate firm and a major overnight package service. These companies self-identified

1 that they were leaving Qwest for a competitor. There is no doubt that CLECs are
2 targeting and, indeed, serving these customers. In addition, the Boeing Company is
3 a “very large” user, as cited in Judge Greene’s decision seventeen years ago as a
4 company that had built private microwave systems to tie together its locations in the
5 Puget Sound Basin, thus bypassing the local switched network.

6

7 **Q. DR. GOODFRIEND INDICATES ON PAGE 33 OF HER TESTIMONY**
8 **THAT QWEST RETAINS CONTROL OVER PRICE FOR CERTAIN**
9 **PRODUCTS, CITING A RECENT CUSTOMCHOICE FILING. DO YOU**
10 **AGREE WITH HER ASSESSMENT?**

11 A. No. The new CustomChoice package was offered at a higher rate than the existing
12 CustomChoice package; however, it also included the addition of several features.
13 The existing CustomChoice package was grandfathered. Existing customers
14 electing not to subscribe to the new package were not required to do so. Qwest does
15 not retain pricing control over any of the services included in Attachment A to its
16 Petition, as every service listed is subject to competition.

17

18 **Q. ON PAGE 35, LINES 7 to 16, DR. GOODFRIEND DISAGREES WITH**
19 **USING WIRE CENTERS AS THE RELEVANT MARKET. PLEASE**
20 **COMMENT.**

21 A. Dr. Goodfriend states that using wire centers as the relevant market fails to take into

1 account business demands which cross wire centers and it also places the focus on
2 collocation, which in her words, “has no direct relationship with CLEC’s ability to
3 supply alternatives for the Qwest products listed in Attachment A” (Goodfriend,
4 page 35, lines 15 to 16). Dr. Goodfriend’s concerns are not valid relative to the
5 Petition Qwest has filed in this proceeding. Qwest has requested, for the most part,
6 reclassification of services in clusters of wire centers, as that’s where competitors
7 are located. As competitors branch out to adjacent and/or additional wire centers,
8 additional filings can be made to reflect the competitive environment in those wire
9 centers. Furthermore, I believe consideration of collocation and other means of
10 competing with Qwest, when viewed by wire center in conjunction with additional
11 data Qwest has submitted in its Petition, such as competitor switch locations, switch
12 types, and switch capabilities, all have a direct bearing on the extent competitors are
13 able to supply alternatives to Qwest’s business services. Therefore, the wire center
14 definition is appropriate for this proceeding.

15

16 **Q. DR. GOODFRIEND MAKES THE OBSERVATION ON PAGE 39 OF HER**
17 **TESTIMONY THAT “RESALE IS A STRATEGY THAT GOES NOWHERE**
18 **UNLESS THE RESELLER INTENDS TO MIGRATE CUSTOMERS TO ITS**
19 **OWN PRODUCT” (LINES 14 to 15). DO YOU AGREE?**

20 A. No. I think resale fulfills a legitimate purpose in advancing local exchange
21 competition. It offers consumers another option in service providers and it allows

1 competitors to establish a presence in the market. Resale is a viable competitive
2 strategy.

3

4

VI. SUMMARY

5

6 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

7 A. In this testimony, I have provided additional evidence that competition exists and
8 is escalating in the small and large business market in Washington, as evidenced
9 by the number of lines lost to competitors and statements made by the competitors
10 themselves. I've shown that the issue raised by Ron Davis in his testimony for
11 Eschelon has already been addressed by this Commission in Docket UT-991476.
12 Hence, it's not appropriate to address it again here. I've addressed Mr. Wood's
13 concerns around the flexibility Qwest is requesting in this docket, demonstrating
14 that competitors, specifically resellers, are not currently disadvantaged when
15 competing in the local exchange market, nor will they be disadvantaged if
16 Qwest's request is granted. Approval of Qwest's petition for competitive
17 classification of business services in this proceeding will stimulate competition to
18 the benefit of the Washington consumer. Finally, in response to Dr. Goodfriend's
19 testimony, I reinforce that competition is occurring in the large and small business
20 markets. I also explain how defining the relevant market at the wire center level
21 reflects the manner in which competitors are approaching the market today and

1 allows for the expansion of competitors' presence into additional areas of the
2 state. I respectfully request the Commission approve Qwest's filing to have
3 business services classified as competitive in the thirty-one wire centers specified
4 in Qwest's Petition.

5

6 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

7 **A.** Yes, it does.

8

9

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

| | | |
|--|---|----------------------|
| In the Matter of the Petition |) | |
| Of Qwest Corporation |) | DOCKET NO. UT-000883 |
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| Services in Specified Wire Centers |) | |

EXHIBITS OF DAVID L. TEITZEL

QWEST CORPORATION

OCTOBER 6, 2000

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