

**CONFIDENTIAL PER PROTECTIVE ORDER IN
WUTC DOCKET NO. UT-033044**

CONFIDENTIAL EXHIBIT NO. _____ (RT-17C)

Docket No. UT-033044

February 20, 2004

BENCH REQUEST NO. 50:

Please provide a list of all transport facilities (*i.e.*, trunks) in Washington State between any two Qwest central offices, or between a Qwest central office and non-Qwest facilities, that you own, control, or lease or have obtained use of from an entity other than Qwest. For each such facility, please identify:

- (a) The A (beginning) location, the Z (ending) location, and any other premises through which the facility is routed;
- (b) The wire center in which the facility is located, by CLLI code (if wire center data is unavailable, please report the data by city);
- (c) The type of transport facility (*i.e.*, DS0, DS1, DS3, dark fiber);
- (d) The transport technology used (*e.g.*, fiber optic (dark or lit), microwave, radio, or coaxial cable);
- (e) The level of capacity the facility is capable of supporting;
- (f) Whether you own the facility, lease or purchase transmission capacity on the facility, use the facility on an unbundled basis, or have obtained the use of the switch on some other non-ownership basis, and if you do not own the facility, please identify the nature of the arrangement and the name of the entity owning the facility; and
- (g) The number of facilities you own, control, lease, or have use of along the same A to Z route you identify in section (a) above.

RESPONSE TO BENCH REQUEST NO. 50:

AT&T objects to Bench Request No. 50 as set forth in the General Objections above and also to the extent it requests information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence. AT&T further objects to Request No. 50 to the extent it requires AT&T to identify the specific geographic location of its network facilities other than its switches that would, therefore, disclose vulnerable spots in its network infrastructure in contravention of the policies expressed in the Homeland Security Act, 6 U.S.C. § 133(a)(1)(E).

REDACTED