

1 access to Unbundled Switching (UBS). The purpose of this response testimony is
2 to solidify that Qwest's record in providing collocation and CLEC-to-CLEC
3 cross-connects does not create any operational impairment for CLECs. As Mr.
4 Pappas noted in his direct testimony (Exhibit No. DP-1T), CLECs currently have
5 ~~503-334~~ collocations in the state of Washington, and Qwest continues to provide
6 CLECs with all forms of collocation throughout the state of Washington in a
7 timely manner. The CLECs argue that collocation is costly; however, the
8 Commission has set the rates for collocation in cost dockets and determined that
9 Qwest's current rates are TELRIC compliant. Finally, I will also rebut the
10 interveners' argument that Qwest should be required to deploy a GR-303 IDLC
11 platform for ease of loop provisioning before Qwest can obtain relief from
12 unbundled switching.

13 III. COLLOCATION

14 **Q. MR. GIOVANNUCCI (PAGE 17), MR. STACY (PAGE 5), AND MR.**
15 **FALCONE (PAGE 8) CONTEND THAT COLLOCATION PROBLEMS**
16 **EXIST THROUGHOUT QWEST'S NETWORK. DOES QWEST OFFER**
17 **MANY COLLOCATION OPTIONS TO CLECs THROUGHOUT THE**
18 **STATE OF WASHINGTON, AND HAS THE COMMISSION APPROVED**
19 **THESE VARIOUS OPTIONS?**