

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-033044

CASE DESCRIPTION: In the Matter of the Petition of Qwest Corporation to Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: WUTC 1 - Bench Requests-011S2

REQUEST:

(a) Please provide, in an electronic format, and on a monthly basis beginning on January 1, 2003, for every Qwest wire center in Washington State, the total number of business mass-market lines served and the total number of business mass-market lines served using integrated digital line carrier. Please provide separately, on a monthly basis for every such wire center, the number of Qwest business mass-market lines, UNE served business mass-market lines, and wholesale served business mass-market lines served.

(b) Please explain how you determined which business lines were mass-market lines and which were enterprise lines.

RESPONSE:

a. Please see HIGHLY CONFIDENTIAL ATTACHMENT "A" for a report of all business access lines served on a DS0 level in each wire center in Washington, and the percent of these business lines served using integrated digital carrier.

Please see HIGHLY CONFIDENTIAL ATTACHMENT "B" for the number of resold DS0-level business lines in service (characterized in the above request as "wholesale" served business lines).

Please see HIGHLY CONFIDENTIAL ATTACHMENT "C" for the estimated number of DS0-level business UNE-P lines in service by wire center. Since Qwest cannot directly track the number of UNE-P lines CLECs are using to serve business customers, Qwest has identified the quantity of UNE-P telephone numbers appearing in the residential section of the Qwest White Pages database, and subtracted those quantities from the total UNE-P quantities in service. The remainder is identified for this purpose as being business UNE-P lines in service. Since only a fraction of all business lines in service actually appear in the White Pages, a simple reporting of UNE-P business listings understates the actual number of UNE-P lines being used for business purposes.

Finally, please see HIGHLY CONFIDENTIAL ATTACHMENT "D" for a report by wire center of all DS0-level UNE-L lines in service. At this time, Qwest has no way to differentiate whether UNE-L lines are used by CLECs to serve residential or business customers, and represents for purposes of this response that all UNE-L lines are being used to serve business customers. However, as CLECs provide discovery responses in this proceeding identifying the proportion of UNE-L lines actually used to serve business customers, Qwest will reflect that information in its direct testimony to be filed in December.

b. For purposes of this response, Qwest has defined all business lines served at the DS0 level as "mass market" business lines. In fact, the FCC has directed the state Commissions to determine the point at which CLECs can efficiently and reasonably serve multi-line business customers with DS1 loops, and the Commission will base its findings in this regard on all evidence supplied by the parties through discovery responses and direct testimony. Qwest does not yet know where this "break" point is, but will submit its recommendation to the Commission as to where it recommends the break point to be in its direct testimony to be filed in December.

Respondents: Elaine Garley, Qwest Manager
Maryann Klasinski, Qwest Manager

SUPPLEMENTAL RESPONSE dated 12/02/03:

A calculation error was found in HIGHLY CONFIDENTIAL WUTC 1-Bench-011 Attachment D. This supplement with Revised HIGHLY CONFIDENTIAL ATTACHMENT D corrects the error.

Respondent: Elaine Garley, Qwest Manager

SUPPLEMENTAL RESPONSE dated 02/27/04:

Seattle Mutual (STTLWA01), an obsolete CLLI which has been subsumed into the Seattle Main (STTLWA06) wire center, was inadvertently excluded from these responses. Seattle Mutual (STTLWA01) should have been included in Seattle Main (STTLWA06) totals. Highly Confidential WUTC 1-Bench-011S2 Attachment D is corrected to combine quantities associated with both CLLI codes into the Seattle Main wire center.

Respondent: Elaine Garley, Qwest Manager

QWEST CORPORATION

STATE: Washington
DOCKET NO: UT-033044
CASE DESCRIPTION: In the Matter of the Petition of Qwest Corporation to Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order
INTERVENOR: Washington Utilities and Transportation Commission
REQUEST NO: WUTC 2-Bench Requests-064S2

REQUEST:

Please provide separately for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the total number of business voice-grade equivalent lines served, as well as the number of business voice-grade equivalent lines that:

- (a) Qwest directly serves;
- (b) CLECs are serving through UNE-L;
- (c) CLECs are serving through UNE-P; and
- (d) CLECs are serving through resale.

RESPONSE:

a. Please see CONFIDENTIAL ATTACHMENT "A" for a report by wire center of all business voice-grade equivalent lines that Qwest directly serves.

b. Please see HIGHLY CONFIDENTIAL ATTACHMENT "B" for a report by wire center of all business voice-grade equivalent lines that CLECs are serving through UNE-L. At this time, Qwest has no way to differentiate whether UNE-L lines are used by CLECs to serve residential or business customers, and represents for purposes of this response that all UNE-L lines are being used to serve business customers. However, as CLECs provide discovery responses in this proceeding identifying the proportion of UNE-L lines actually used to serve business customers, Qwest will reflect that information in its direct testimony to be filed in December.

c. Please see HIGHLY CONFIDENTIAL ATTACHMENT "C" for a report by wire center of the estimated number of business voice-grade equivalent lines that CLECs are serving through UNE-P. Since Qwest cannot directly track the number of UNE-P lines CLECs are using to serve business customers, Qwest has identified the quantity of UNE-P telephone numbers appearing in the residential section of the Qwest White Pages database, and subtracted those quantities from the total UNE-P quantities in service. The remainder is identified for this purpose as being business UNE-P lines in service. Since only a fraction of all business lines in service actually appear in the White Pages, a simple reporting of UNE-P business listings understates the actual number of UNE-P lines being used for business purposes.

d. Please see HIGHLY CONFIDENTIAL ATTACHMENT "D" for a report by wire center of all business voice-grade equivalent lines CLECS are serving through resale.

Respondents: Elaine Garley, Qwest Manager
Maryann Klasinski, Qwest Manager

SUPPLEMENTAL RESPONSE dated 12/02/03:

A calculation error was found and HIGHLY CONFIDENTIAL ATTACHMENTS "B" and "D" were reversed. This supplement with Revised HIGHLY CONFIDENTIAL ATTACHMENTS B

and D corrects the errors.

Respondent: Elaine Garley, Qwest Manager

SUPPLEMENTAL RESPONSE dated 02/27/04:

Seattle Mutual (STTLWA01), an obsolete CLLI which has been subsumed into the Seattle Main (STTLWA06) wire center, was inadvertently excluded from these responses. Seattle Mutual (STTLWA01) should have been included in Seattle Main (STTLWA06) totals. Highly Confidential WUTC 2-Bench-064S2 Attachment B is corrected to combine quantities associated with both CLLI codes into the Seattle Main wire center.

Respondent: Elaine Garley, Qwest Manager