

UT-043007 Smith Direct
Eschelon Telecom, Inc. July 23, 2004
Exhibit No. _____ (RLS-16T)

QWEST CORPORATION
STATE: Washington
DOCKET NO: UT-043007
CASE DESCRIPTION: In the Matter of the Second Six-Month Review of Qwest Corporation's Performance Assurance Plan
INTERVENOR: Eschelon Telecom, Inc.
REQUEST NO: ESCH 03-027

REQUEST:

- (a) Provide the total number of Local Service Requests ("LSRs") in Washington for which Qwest corrected service order errors, by month, from October 2003 to April 2004.
- (b) Provide, by month from October 2003 to April 2004, the number of errors reported in 17(a) associated with electronically submitted LSRs requesting inward line activity and the number of errors electronically submitted LSRs requesting inward feature activity. [sic]
- (c) For Eschelon LSRs in this response, provide the close out code, sub-code, and any ticket number assigned by Qwest.

RESPONSE:

- (a) Objection. The information requested does not exist, and its creation would require Qwest to conduct a special study, which is not within the definition of a data request, and such a study could not be conducted within the available time and the request is therefore also unduly burdensome.
- (b) Objection. The request is not clear. Under the assumption that the request seeks as the second element "the number of errors reported in 17(a) associated with electronically submitted LSRs requesting inward feature activity," the information requested does not exist, and its creation would require Qwest to conduct a special study, which is not within the definition of a data request, and such a study could not be conducted within the available time and the request is therefore also unduly burdensome.
- (c) Objection. The information requested does not exist, and its creation would require Qwest to conduct a special study, which is not within the definition of a data request, and such a study could not be conducted within the available time and the request is therefore also unduly burdensome.