

RECEIVED
REGISTRATION DIVISION
00 OCT 10 PM 3:35



Mary Tribby
Chief Regulatory Counsel

STATE OF WASHINGTON
UTIL. AND TRANSP.
COMMISSION

Room 1575
1875 Lawrence Street
Denver, CO 80202
303 298-6508
FAX 303 298-6301
mbtribby@att.com

October 10, 2000

Via Hand Delivery

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P. O. Box 47250
Olympia, Washington 98504-7250

Re: In the Matter of the Investigation Into U S WEST Communications, Inc.'s
Compliance with Section 271 of the Telecommunications Act of 1996,
Docket No. UT-003022

In the Matter of U S WEST Communications, Inc.'s Statement of Generally
Available Terms Pursuant to Section 252(f) of the Telecommunications Act
of 1996, Docket No. UT-003040

Dear Ms. Washburn:

Enclosed for filing in the above-referenced matter are the original and nineteen copies of AT&T's Initial Comments, Affidavit of Kenneth L. Wilson Regarding Interconnection, Collocation and Resale, Affidavit of Kenneth L. Wilson Regarding Local Number Portability, and Affidavit of Timothy D. Boykin Regarding Trunking and Location Routing Numbers.

Please call me if you have any questions regarding this filing.

Very truly yours,

Mary B. Tribby / JB

Mary B. Tribby

MBT/jb

Enclosures
cc: Parties of Record

1 **BEFORE THE WASHINGTON UTILITIES**
2 **AND TRANSPORTATION COMMISSION**

RECEIVED
00 OCT 10 PM 3:35

STATE OF WASHINGTON
UTIL. AND TRANSP.
COMMISSION

3 In the Matter of the Investigation Into)
4 U S WEST Communications, Inc.'s) Docket No. UT-003022
5 Compliance With Section 271 of the)
6 Telecommunications Act of 1996)

7 _____)
8)
9 In the Matter of U S WEST Communications,) Docket No. UT-003040
10 Inc.'s Statement of Generally Available)
11 Terms Pursuant to Section 252(f) of the)
12 Telecommunications Act of 1996)

13 _____)
14)
15 **AT&T'S INITIAL COMMENTS**

16 AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services
17 on behalf of TCG Seattle and TCG Oregon (collectively "AT&T") hereby submit these
18 Initial Comments and Supporting Affidavits for the Second Set of Workshops on
19 Checklist Items 1, 11, and 14.

20 **INTRODUCTION**

21 The United States Congress conditioned the Regional Bell Operating Companies'
22 ("BOC") entrance into the in-region interLATA long distance market on their compliance
23 with 47 U.S.C. § 271. To be in compliance with § 271, Qwest Communications, Inc.
24 ("Qwest") must "support its application with actual evidence demonstrating its *present*
25 compliance with the statutory conditions for entry."¹

¹ In the Matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State New York, Memorandum Opinion and Order, CC Docket No. 99-295, FCC 99-404 (Dec. 22, 1999) at ¶ 37 ("FCC BANY Order").

1 The Washington Utilities and Transportation Commission (“Commission”) is
2 charged with the important task of ensuring that the local telecommunications market in
3 Washington is open to competition and that Qwest is complying with its obligations
4 under both the state and federal law. While remaining the final decision-maker on
5 Qwest’s compliance with its § 271 obligations, the Federal Communications Commission
6 (“FCC”) looks to the state commissions for rigorous factual investigations upon which
7 the FCC may base its conclusions.

8 To conduct a rigorous investigation, one must understand both the legal standards
9 that Qwest is held to and, importantly, Qwest’s actual implementation of those standards.
10 Releasing Qwest to compete in the interLATA long distance market before it has fully
11 and fairly complied with its obligations under § 271 will discourage, if not destroy,
12 competition in both the local and long distance markets in Washington.

13 Many a local competitor, including AT&T, has invested heavily in the promise of
14 open and fair competition in the local exchange market. AT&T requests that the
15 Commission, through its rigorous investigation of Qwest’s claims, ensure that the nascent
16 local competitors realize that promise. To that end, AT&T respectfully submits these
17 Comments, containing a summary of the primary legal standards, and the accompanying
18 affidavits of Mr. Kenneth L. Wilson and Mr. Timothy D. Boykin.

19 For ease of application in these proceedings, AT&T witnesses offer their
20 testimony in an affidavit format. The issues addressed in the affidavits are generally
21 limited to Qwest’s obligations under the Act and whether the SGAT of record reflects

1 compliance with these obligations. AT&T will address state-specific law and state-
2 specific performance and data in future proceedings in Washington.²

3 **GENERAL STANDARD OF REVIEW**

4 Through these workshops, the Commission is conducting investigations of both
5 Qwest's Statements of Generally Available Terms ("SGAT") and Qwest's actual
6 compliance, or lack thereof, with the checklist items contained in 47 U.S.C. §
7 271(c)(2)(B). With respect to the SGAT review, a "State commission may not approve
8 such statement unless such statement complies with [§ 252(d)] and [§ 251] and the
9 regulations thereunder." 47 U.S.C. § 252(f). Furthermore, a state commission may
10 establish or enforce other requirements of state law in its review of the SGAT. *Id.*

11 To demonstrate compliance with the requirements of § 271's competitive
12 checklist, Qwest must show that "it has 'fully implemented the competitive checklist
13 [item]... .'"³ Thus, Qwest must plead, with appropriate supporting evidence, the facts
14 necessary to demonstrate it has complied with the particular requirements of the checklist
15 item under consideration.⁴ It must:

16 establish that it is 'providing' a checklist item, [by] demonstrat[ing] that it
17 has a concrete and specific legal obligation to furnish the item upon
18 request pursuant to a state-approved interconnection agreement or
19 agreements that set forth prices and other terms and conditions for each
20 checklist item, and that it is currently furnishing, or is ready to furnish, the

² AT&T understands that the consideration of all data and performance measures will await the conclusion of the ROC measurement auditing and OSS testing before the Washington Commission or any parties will address such material.

³ FCC BANY Order at ¶ 44.

⁴ *Id.* at ¶ 49.

1 checklist item in the quantities that competitors may reasonably demand
2 and at an acceptable level of quality.⁵

3 In this proceeding, Qwest asks the Commission to consider both the interconnection
4 agreements and its SGAT as evidence of compliance. Qwest must prove each of these
5 elements by a preponderance of the evidence.⁶ Furthermore, the FCC has determined
6 that the most probative evidence is commercial usage along with performance measures
7 providing evidence of quality and timeliness of the performance under consideration.
8 Finally, as with any application, the “ultimate burden of proof that its application satisfies
9 all the requirements of section 271, even if no party files comments challenging its
10 compliance with a particular requirement[,]” rests upon Qwest.⁷

11 **SPECIFIC REVIEW OF CHECKLIST ITEMS**

12 Following are the specific standards of review⁸ for the checklist items, by subject
13 matter, under consideration in the second workshop.

14 **I. INTERCONNECTION (Checklist Item 1)**

15 Interconnection means the physical linking of two networks for the mutual
16 exchange of traffic.⁹ Section 271(c)(2)(B)(i) of the Act requires Qwest to provide

⁵ In the Matter of Application of BellSouth Corporation et al. for Provision of Inregion-interLATA Services in Louisiana, Memorandum Opinion and Order, CC Docket No. 98-121, FCC 98-271 (Released Oct. 13, 1998) at ¶ 54 (“**BellSouth Louisiana Order**”).

⁶ Id. at ¶ 48.

⁷ Id. at ¶ 47.

⁸ All the standards contained herein are discussed in far greater detail in the FCC’s orders, and AT&T’s witnesses will endeavor to discuss that level of detail in their affidavits.

⁹ 47 CFR § 51.5 (definition of “Interconnection”); In the Matter of Implementation of the Local Competitor Provisions in the Telecommunications Act of 1996, First Report and Order, FCC 96-325, CC No. 96-98 (Released Aug. 8, 1996) at ¶ 176 (“**First Report and Order**”).

1 interconnection in accordance with the requirements of §§ 251(c)(2) and 252(d)(1).

2 Section 251(c)(2) imposes upon Qwest:

3 [t]he duty to provide, for the facilities and equipment of any requesting
4 telecommunications carrier, interconnection with the local exchange
5 carrier's network—

6 (A) for the transmission and routing of telephone exchange
7 service and exchange access;

8 (B) at *any technically feasible point* within the carrier's
9 network;

10 (C) that is *at least equal in quality to* that provided by the
11 local exchange carrier to itself or to any subsidiary,
12 affiliate, or any other party to which the carrier provides
13 interconnection; and

14 (D) on rates, terms, and conditions that *are just,*
15 *reasonable, and nondiscriminatory ...*

16 47 U.S.C. § 251(c)(2)(emphasis added); *see also* 47 CFR § 51.305. “Technical
17 feasibility” means technically or operationally possible without regard to economic,
18 space or site considerations.¹⁰ The FCC has determined that competitive local exchange
19 carriers (“CLECs”) may “choose any method of technically feasible interconnection at a
20 particular point on the incumbent LEC’s network. Technically feasible methods also
21 include, but are not limited to, physical and virtual collocation and meet point
22 arrangements.”¹¹ The minimum number of feasible points for interconnection include
23 the: (1) line-side of the local switch; (2) trunk-side of a local switch; (3) trunk
24 interconnection points for a tandem switch; (4) central office cross-connect points;
25 (5) out-of-band signaling transfer points necessary to exchange traffic and access call-

¹⁰ *Id.* at ¶ 198; 47 CFR § 51.5 (definition of “Technically Feasible”).

¹¹ FCC BANY Order at ¶ 66.

1 related data bases and (6) the points of access to unbundled network elements (“UNEs”).
2 47 CFR § 51.305.

3 In addition to technical feasibility, the FCC has also defined “equal-in-quality” to
4 require the incumbent LEC “to provide interconnection between its network and that of a
5 requesting carrier at a level of quality that is at least indistinguishable from that which the
6 incumbent provides itself, a subsidiary, an affiliate, or any other party.”¹²

7 Finally, the FCC has further defined “just, reasonable, and nondiscriminatory” in
8 the context of interconnection to mean:

9 that an incumbent LEC must provide interconnection to a competitor in a
10 manner no less efficient than the way in which the incumbent LEC
11 provides comparable function to its own retail operations.

12 FCC BANY Order at ¶ 65.

13 **II. COLLOCATION** (Checklist Item 1)

14 Competitors may “collocate” for interconnection or access to the incumbent’s
15 network within the premises of the incumbent. The FCC has recently amended its
16 definition of premises to include:¹³

17 an incumbent LEC’s central offices and serving wire centers; all buildings
18 or similar structures owned, leased, or otherwise controlled by an
19 incumbent LEC that house its network facilities; all structures that house
20 incumbent LEC facilities on public rights-of-way, including but not
21 limited to vaults containing loop concentrators or similar structures; and
22 all land owned, leased, or otherwise controlled by an incumbent LEC that
23 is adjacent to these central offices, wire centers, buildings, and
24

¹² Id. at ¶ 224.

¹³ Although the FCC’s latest collocation order is not yet effective, from a practical standpoint Qwest should implement it in this SGAT now because the FCC has ordered all BOCs to amend their SGATs to incorporate its new standards.

1 structures.¹⁴

2 Generally, carriers accomplish collocation in two ways: (a) physical collocation;
3 and (b) virtual collocation. Physical collocation is basically “an offering by an incumbent
4 LEC that enables a requesting carrier” to place its interconnection and access equipment
5 within or upon an incumbent’s premises. 47 CFR § 51.5 (definition of “Physical
6 Collocation”). The collocated equipment may be used for interconnection or access to
7 UNEs, transmission and routing facilities, and exchange access service. Finally, Qwest
8 should provide collocation within the new intervals outlined by the FCC, which require,
9 among other things, that within 10 calendar days after receiving an application, Qwest
10 must inform the CLEC whether its application meets collocation standards. 47 CFR §
11 51.323(1)(1). Then, Qwest must complete physical collocation arrangements within 90
12 calendar days after receiving an application that meets the collocation standards. 47 CFR
13 § 51.323(1)(2). Furthermore, Qwest must finish construction and turn functioning space
14 over to the CLEC within the 90 day interval. *See* Order on Reconsideration at ¶ 30.
15 Longer intervals must be submitted to the state commissions for approval. Order on
16 Reconsideration at ¶ 29.

17 Like physical collocation, virtual collocation is “an offering by an incumbent LEC
18 that enables a requesting carrier to” designate equipment to be used for interconnection or
19 access to UNEs, transmission and routing and exchange access. 47 CFR § 51.5

20

¹⁴ 47 CFR § 51.5 (as amended); *see also* In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Order on Reconsideration & Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 & Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, CC Docket Nos. 98-147 & 96-98, FCC 00-297 (Released Aug. 10, 2000) at ¶ 47 (further defining the buildings and structures) (hereinafter “**Order on Reconsideration**”).

1 (definition of “Virtual Collocation”). For virtual collocation, however, the requesting
2 carrier employs the use of the incumbent’s equipment rather than supplying its own.
3 While the FCC has set national standards for the provisioning intervals of physical
4 collocation, it has—as yet—declined to do so for virtual collocation.¹⁵ Nevertheless, the
5 FCC has declared that “intervals significantly longer than 90 days generally will impede
6 competitive LECs’ ability to compete effectively.”¹⁶

7 The Act imposes upon Qwest “the duty to provide, on rates, terms and conditions
8 that are just, reasonable, and nondiscriminatory, for physical collocation of equipment
9 necessary for interconnection or access to unbundled network elements at the premises of
10 the local exchange carrier, except that the carrier may provide for virtual collocation if
11 the local exchange carrier demonstrates to the State commission that physical collocation
12 is not practical for technical reasons or because of space limitations.” 47 U.S.C. §
13 251(c)(6); *see also*, 47 CFR § 51.323(a).¹⁷ Qwest must allow the collocation of any type
14 of equipment that is “necessary, required or indispensable.”¹⁸ The Ninth Circuit has
15 determined that the Act permits state commissions to require the collocation of remote
16 switching units (“RSUs”) on ILEC premises, approving decisions by the Washington
17 Commission requiring such collocation.¹⁹

¹⁵ *Id.* at ¶ 32.

¹⁶ *Id.* at ¶ 29.

¹⁷ The Order on Reconsideration requires Qwest denials of collocation for lack of space to be submitted to the State Commissions; the submission now includes the floor plans and affidavits explaining the limitation. 47 CFR § 51.321(f)(as amended).

¹⁸ *GTE Service Corp. v. FCC*, 205 F.3d 416, 424 (D.C. Cir. 2000). Qwest declares that it has interpreted this case to mean it may: (1) disconnect competitors’ collocated equipment that contain switching functions and (2) retroactively apply its interpretation to its local competitors regardless of arbitration agreements or State law. AT&T hereby reserves its right to seek retribution and any other legal remedy available should Qwest engage in the conduct threatened in its SGAT.

¹⁹ *U S WEST Communications v. Hamilton*, 2000 WL 1335548 (9th Cir. Sept. 13, 2000); *MCI Telecommunications Corporation v. U S WEST Communications*, 204 F.3d 1262 (9th Cir. Mar. 2, 2000).

1 Furthermore, in the context of a § 271 showing, the FCC has declared, among
2 other things:

3 To show compliance with its collocation obligations, a BOC must have
4 processes and procedures in place to ensure that all applicable collocation
5 arrangements are available on terms and conditions that are “just,
6 reasonable, and nondiscriminatory” in accordance with section 251(c)(6)
7 and our implementing rules. Data showing the quality of procedures for
8 processing applications for collocation space, as well as the timeliness and
9 efficiency of provisioning collocation space, helps the Commission
10 evaluate a BOC’s compliance with its collocation obligations.

11 FCC BANY Order at ¶ 66. The FCC also concluded that to ensure that incumbents did
12 not misuse limited-space arguments, incumbents had an affirmative obligation to provide
13 detailed floor plans or diagrams to state commissions for review of such claims. First
14 Report and Order at ¶ 602.

15 **III. RESALE** (Checklist Item 14)

16 With respect to the Act, § 271(c)(2)(B)(xiv) requires Qwest to make
17 “telecommunications services ... available for the resale in accordance with the
18 requirements of sections 251(c)(4) and 252(d)(3).” 47 U.S.C. § 271(c)(2)(B)(xiv).

19 Section 251(c)(4)(A) mandates that Qwest “offer for resale at wholesale rates any
20 telecommunications service that the carrier provides at retail to subscribers who are not
21 telecommunications carriers.” 47 U.S.C. § 251(c)(4)(A). Section 252(d)(3) requires state
22 commissions to “determine wholesale rates on the basis of retail rates charged to
23 subscribers for the telecommunications service requested, excluding the portion thereof
24 attributable to any marketing, billing, collection, and other costs that will be avoided by
25 the local exchange carrier.” 47 U.S.C. § 252(d)(3).

1 In addition to the affirmative obligations to provide telecommunications services
2 for resale, Qwest also has an obligation to refrain from placing “unreasonable or
3 discriminatory conditions or limitations” on the services subject to resale. 47 U.S.C. §
4 251(c)(4)(B). In short, Qwest’s restrictions on resale are presumed to be unreasonable
5 unless it can prove to this Commission that the restriction is reasonable and non-
6 discriminatory. First Report and Order at ¶ 939.²⁰

7 In addition, the FCC has determined that resellers may not make Qwest’s resold
8 services available to a different category of customer where Qwest makes that same
9 service available to only a specific category of retail customer.

10 **IV. LOCAL NUMBER PORTABILITY (Checklist Item 11)**

11 Section 271(c)(2)(B) of the Act requires a BOC to comply with the number
12 portability regulations adopted by the Commission pursuant to section 251.²¹ Section
13 251(b)(2) requires all LECs “to provide, to the extent technically feasible, number
14 portability in accordance with requirements prescribed by the Commission.”²² In order to
15 prevent the cost of number portability from thwarting local competition, Congress
16 enacted § 251(e)(2), which requires that “[t]he cost of establishing telecommunications
17 numbering administration arrangements and number portability shall be borne by all
18 telecommunications carriers on a competitively neutral basis as determined by the

²⁰ To rebut the presumption, Qwest would also have to demonstrate that the restriction is narrowly tailored.
First Report and Order at ¶ 939.

²¹ 47 U.S.C. § 271(c)(2)(B)(xii).

²² 47 U.S.C. § 251(b)(2).

1 Commission.”²³

2 Pursuant to these statutory provisions, the FCC requires that BOCs provide
3 number portability in a manner that allows users to retain existing telephone numbers
4 “without impairment in quality, reliability, or convenience.”²⁴ In addition, the FCC
5 requires the BOC to demonstrate that it can coordinate number portability with loop cut-
6 overs in a reasonable amount of time and with minimum service disruption. The FCC
7 established guidelines for states to follow in mandating a competitively neutral cost-
8 recovery mechanism for interim number portability,²⁵ and created a competitively neutral
9 cost-recovery mechanism for long-term number portability.²⁶

10 **CONCLUSION**

11 When the standards outlined above, along with the more particular rules and
12 statutory references, are applied to Qwest's Application, Affidavits and supporting
13 evidence, it is clear that Qwest is not *presently* in compliance with its obligations under §
14 271. With respect to the SGAT, AT&T's attached affidavits discuss numerous instances
15 wherein Qwest is not in compliance with its obligations under §§ 252(d) and 251 of the
16 Act nor state law.

²³ 47 U.S.C. § 251(e)(2); *see also* Application of BellSouth Corporation pursuant to Section 271 of the Communications Act of 1934, as amended, to provide in region-inter LATA services in Louisiana, CC Docket No. 98-121, FCC 98-271, (Released Oct. 13, 1998) at ¶ 274 (“**BellSouth Second Louisiana Order**”); In the Matter of Telephone Number Portability, Third Report and Order, 13 FCC Rcd 11701, 11702-04 (1998) (“**Third Number Portability Order**”); In the Matter of Telephone Number Portability, Fourth Memorandum Opinion and Order on Reconsideration, CC Docket No. 95-116 at ¶¶ 1, 6-9 (Release Jun. 23, 1999) (“**Fourth Number Portability Order**”).

²⁴ BellSouth Second Louisiana Order at ¶ 276.

²⁵ *See* 47 C.F.R. § 52.29; BellSouth Second Louisiana Order at ¶ 275; First Number Portability Order at ¶¶ 127-140.

²⁶ *See* 47 CFR §§ 52.32 & 52.33; BellSouth Second Louisiana Order at ¶ 275; Third Number Portability Order at ¶ 8; Fourth Number Portability Order at ¶ 9.

1 The attached affidavits also discuss AT&T's present commercial use of Qwest's
2 interconnection and collocation services. AT&T's experience confirms that Qwest is not
3 presently in compliance with its obligations under § 271 Checklist Item 1
4 (interconnection and collocation). Only after a proper review of all the audited
5 performance data and CLECs' data²⁷ will the Commission and Qwest have sufficient
6 evidence to determine the real level of compliance with the checklist items and standards
7 outlined above. In the interim, however, AT&T's real world experience stands in stark
8 contrast to Qwest's vague claims of compliance. In fact, based upon AT&T's experience
9 and Qwest's clear noncompliance in many instances, Qwest has not met its burden of
10 proof.

11 Respectfully submitted on this 10th day of October, 2000.

12 **AT&T COMMUNICATIONS OF THE**
13 **PACIFIC NORTHWEST, INC. AND**
14 **AT&T LOCAL SERVICES ON BEHALF OF**
15 **TCG SEATTLE AND TCG OREGON**

16 *Mary B. Tribby / JB*
17 _____
18 Mary B. Tribby
19 Steven H. Weigler
20 Letty S.D. Friesen
21 1875 Lawrence Street, Suite 1575
22 Denver, Colorado 80202
Telephone: (303) 298-6475

²⁷ Offered at the appropriate time in this proceeding.

CERTIFICATE OF SERVICE

I certify that the original and nineteen copies of AT&T's Initial Comments, Affidavit of Kenneth L. Wilson Regarding Interconnection, Collocation and Resale, Affidavit of Kenneth L. Wilson Regarding Local Number Portability, and Affidavit of Timothy D. Boykin Regarding Trunking and Location Routing Numbers in Docket Nos. UT-003022 and UT-003040, were hand delivered on October 10, 2000 to:

Carole Washburn, Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive, SW
P. O. Box 47250
Olympia, WA 98504-7250

I also certify that on October 10, 2000 copies of AT&T's Initial Comments, Affidavit of Kenneth L. Wilson Regarding Interconnection, Collocation and Resale, Affidavit of Kenneth L. Wilson Regarding Local Number Portability, and Affidavit of Timothy D. Boykin Regarding Trunking and Location Routing Numbers were e-mailed and/or mailed to the following:

Robert Cromwell
Simon ffitc
Public Counsel
Office of the Attorney General
900 4th Avenue, Suite 2000
Seattle, WA 98164-1012

Mark Trincherro
Davis Wright Tremaine
1300 SW Fifth Ave., Suite 2300
Portland, OR 97201-5682

Steven R. Beck
Qwest Corporation
1801 California Street, Suite 5100
Denver, CO 80202

W. Clay Deanhardt
Covad Communications Company
4250 Burton Street
Santa Clara, CA 95054

Brooks Harlow
Miller, Nash, LLP
4400 Two Union Square
601 Union Street
Seattle, WA 98101-2352

Gregory J. Kopta
Davis Wright Tremaine
2600 Century Square, 25th Floor
1501 Fourth Avenue
Seattle, WA 98101-1688

Arthur A. Butler
Ater Wynne Hewitt Dodson & Skerritt, LLP
601 Union Street, Suite 5450
Seattle, WA 98101-2327

Ann E. Hopfenbeck
MCI WorldCom, Inc.
707 17th Street, Suite 3600
Denver, CO 80202

R. Dale Dixon, Jr.
Davis Wright Tremaine
1300 SW Fifth Ave., Suite 2300
Portland, OR 97201-5682

Penny Bewick
New Edge Network, Inc.
d/b/a New Edge Networks
3000 Columbia House Blvd., Suite 106
Vancouver, WA 98661

Andrew O. Isar
Director – State Affairs
Telecommunications Resellers Assoc.
3220 Uddenberg Lane, Suite 4
Gig Harbor, WA 98355

Lisa Anderl
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle, WA 98191

Rich Lipman
McLeodUSA Telecommunications Services, Inc.
6400 C Street, SW
Cedar Rapids, IA 52406

Eric S. Heath
United Telephone Company of the NW/SPRINT
MS: NVLSVB0110
330 S. Valley View Blvd.
Las Vegas, NV 89152

Dennis Ahlers
Eschelon Telecom, Inc.
730 2nd Avenue South, Suite 1200
Minneapolis, MN 55402

Lisa F. Rackner
Ater Wynne LLP
222 SW Columbia Street, Suite 1800
Portland, OR 97201-6618


