

QWEST CORPORATION

STATE: Washington  
DOCKET NO: UT-053025  
CASE DESCRIPTION: Investigation concerning the status of competition and impact of the FCC's Triennial Review Remand Order on the competitive telecommunications environment in Washington State  
INTERVENOR: Washington Utilities and Transportation Commission  
REQUEST NO: WUTC Order 03-001

REQUEST:

Qwest Corporation and Verizon Northwest Inc. must submit to the Commission and interested persons on or before April 28, 2006, business line counts showing actual business lines as reporting in their December 2003 ARMIS 43-08 data, without adjusting the data to reflect the total capacity of access lines. The companies must provide this information only for those wire centers the Joint CLECs continue to dispute.

RESPONSE:

Qwest provides this response pursuant to Order No. 3, without waiver of its right to petition for reconsideration of Order No. 3 or to otherwise take a position as to the relevance or probative value of the information.

Below and in Confidential Attachment A, Qwest provides the recalculation of the Business Switched Access Lines for the three (3) wire centers the Joint CLECs continue to dispute. It should be noted that, pursuant to FCC requirements for providing data for the ARMIS 43-08 report, Business Switched Access Line data is reported on a statewide level. Actual active channels on underlying DS1 facilities supporting products such as ISDN-PRI, Digital Switched Service (DSS) and UAS, which is a similar product to DSS, are known and reported by state.

When disaggregating the ARMIS 43-08 Business Switched Access Line data to the wire center level as required by the TRRO, average fill factors must be applied to the DS1 facilities underlying ISDN-PRI, DSS and UAS services. As a result, to obtain active channel information at a wire center level, the statewide ARMIS quantities for those products are apportioned across the wire centers based on the underlying DS1s used to provide the ISDN-PRI, DSS, and UAS services in each wire center. Once apportioned, Qwest applies a statewide average fill factor to those counts to derive the number of active channels by wire center. Please see Confidential Attachment A for the factors, which reflect the statewide average fill factors for ISDN-PRI, DSS and UAS products in Washington that were applied to the quantities for those products for both Qwest's retail and UNE-P.

All other lines included in the Business Switched Access Line counts reflect actual circuits in use.

Pursuant to Ordering Paragraph (1) of Order No. 03, please see Confidential Attachment A for the recalculated quantities for the wire centers the Joint CLECs continue to dispute.

Respondent: Carolyn Hammack

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INTERVENOR: Washington Utilities and Transportation Commission  
REQUEST NO: WUTC Order 03-004

REQUEST:

Qwest Corporation and Verizon Northwest Inc. must respond to the Joint CLECs' data requests regarding identification of fiber-based collocators, only for those wire centers the Joint CLECs continue to dispute, on or before April 28, 2006.

RESPONSE:

Qwest provides this response pursuant to Order No. 3, without waiver of its right to petition for reconsideration of Order No. 3 or to otherwise take a position as to the relevance or probative value of the information.

Please see the attached Response to Ordering Paragraph 4 and the accompanying Confidential Attachment A, Attachment B and HIGHLY CONFIDENTIAL Attachments C - J.

Respondent: Rachel Torrence