

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

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

DOCKET NO. UT-033044  
PUBLIC COUNSEL RESPONSE TO  
JOINT CLEC MOTION FOR  
ANONYMOUS DISCLOSURE

Pursuant to the Notice of Opportunity to Respond of November 12, 2003, Public Counsel files the following response to the Joint Motion for Anonymous Disclosure of CLEC Data Joint Motion.

Public Counsel does not object to the masking request in the Joint Motion, with the understanding that no aggregation would occur, that it is administratively feasible, and that Public Counsel would have access to the unmasked raw CLEC data. Counsel for Joint CLECs, Greg Kopta, has represented to Public Counsel that such access would be consistent with the intent of the Joint Motion. This appears to be also consistent with the approach taken in the comparable Minnesota docket, which provided that unmasked copies of the data would be provided to the Public Counsel counterpart, Office of the Attorney General – Residential and Small Business Utilities Division. *See* Docket No. P999/CI-03-961, October 22, 2003, Minnesota Department of Commerce, (document provided by Joint CLECs via e-mail of November 13). Public Counsel does not support use in this docket of any aggregation, including the summary or aggregation approach apparently adopted in the comparable Oregon docket. OPUC Docket UM 1100, First Prehearing Conference Report, October 3, 2003 (document provided by Joint CLECs

via November 13, 2003 e-mail). By filing this response, Public Counsel does not waive the right to later object to any confidentiality designation or masking under the objection procedures of the protective order in this docket.

DATED this 14<sup>th</sup> day of November, 2003.

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