

Washington
DOCKET NO. UT-083041
Charter 2-52

INTERVENOR: CHARTER FIBERLINK WA-CCVII, LLC

REQUEST NO: 52

Re: Linse Rebuttal at 3, lines 18-20: How many times, within the last five years, has Qwest faced a switch exhaust situation which has resulted in the denial of interconnection by a requesting carrier? Please describe each such occasion.

RESPONSE:

Based on the present state of its investigation, Qwest has not identified any instances in which it formally denied a CLEC request to connect a CLEC switch (used by a CLEC in the same manner as Qwest uses its own switches within Qwest's network) to a Qwest switch in the past five years in Washington.

Respondent: Phil Linse

Washington
DOCKET NO. UT-083041
Charter 2-53

INTERVENOR: CHARTER FIBERLINK WA-CCVII, LLC

REQUEST NO: 53

Re: Linse Rebuttal at 8, lines 13-15: If Charter obtains interconnection from Qwest at a single location, as described in this section of Mr. Linse's Rebuttal Testimony, would Charter be required to obtain direct trunked transport from Qwest if Charter provided service in multiple Qwest service areas but wished to exchange traffic with Qwest at the single location? Please explain your response.

RESPONSE:

Charter may choose to serve multiple service areas with a single point of interconnection with Qwest but will need DTT to reach Qwest tandem and/or end office switches with which it would like to exchange traffic. Qwest and Charter will share the cost of these DTT facilities based on distance and each party's relative use of the facilities.

Respondent: Phil Linse

Washington
DOCKET NO. UT-083041
Charter 2-54

INTERVENOR: CHARTER FIBERLINK WA-CCVII, LLC

REQUEST NO: 54

Re: Linse Rebuttal at 9, lines 20-21, please provide the following information:

- a. Does Qwest transport Charter-originated traffic to each of the thirty one central office switches identified in Exhibit PL-9?
- b. If the response to the previous question is anything other than an unqualified affirmative response, specifically identify (by CLLI code) the central office switches identified in Exhibit PL-9 to which Qwest transports Charter-originated traffic.
- c. Exhibit PL-9 only identifies thirty one central office switches. Mr. Linse refers to (over 45 central office switches) at page 9, lines 20-21 of his Rebuttal Testimony. Please identify the fourteen (or more) other switches to which Qwest transports Charter originated traffic.
- d. Identify each Qwest tandem office in Washington to which Qwest (makes transport available to Charter") as that term is used in Mr. Linse's Rebuttal Testimony at page 9, lines 20-21.
- e. Confirm that the diagram provided in Exhibit PL-9 reflects facilities available to carry local traffic exchanged between Qwest subscribers served by the Qwest tandem switch in Spokane-Riverside, and Charter subscribers served by the Charter switch in Kennewick.

RESPONSE:

- a. Exhibit PL-9 identifies 34 Qwest central office switches. To the extent that Charter's customers originate traffic destined to Qwest local service customers served by each of the thirty four central office switches identified in Exhibit PL-9, Qwest would transport Charter originated traffic to each of the thirty four central office switches.
- b. See response to 54 a.
- c. Exhibit PL-9 identifies thirty four Qwest central office switches that are served by the Qwest Spokane access tandem, only 31 are included in the diagram and the other three are noted on the left of the page and are remotes. Exhibit PL-9 does not include end offices served by Qwest's Yakima or Walla Walla tandems. The following are Qwest end office switches that are served by

Qwest's Yakima and Walla Walla tandems:

Walla Walla Tandem: DYTNWA01DS0, MLTNOR56RS0, WLWLWA01DS0, WTBGWA01DS0,

Yakima Tandem: CLELWA01DS0, ESTNWA01DS0, OMAKWA01DS0, ORVLWA01DS0,
PASCWA01DS0, PTRSWA01DS0, YAKMWA02DS1, YAKMWAWEDS0

d. Tandem CLLI Tandem Type

ABRDWA01C9T	ACCESS/LOCAL
BMTNWA0101T	LOCAL
CHHLWA0155T	LOCAL
MSLKWA0101T	LOCAL
OLYMWA0201T	LOCAL
PTANWA0101T	LOCAL
PTTWWA0101T	LOCAL
SPKNWA012ED	E911
SPKNWA0154T	LOCAL/E911
SPKNWA01C9T	ACCESS/TOPS
STTLWA0303T	ACCESS
STTLWA0355T	LOCAL
STTLWA051ED	E911
STTLWA061GT	TOPS
STTLWA0657T	E911
STTLWA06C9T	ACCESS
TACMWAF30T	LOCAL
WLWLWA0101T	LOCAL
WLWLWA01C9T	ACCESS
YAKMWA0255T	E911
YAKMWAWEC9T	ACCESS/LOCAL/TOPS

e. The diagram provided in Exhibit PL-9 generally reflects facilities that may be available to carry local traffic exchanged between Qwest subscribers served by the Qwest tandem switch in Spokane-Riverside, and Charter subscribers served by the Charter switch in Kennewick.

Respondent: Phil Linse