

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of Frontier Communications Northwest Inc.'s Petition to be Regulated as a Competitive Telecommunications Company Pursuant to RCW 80.26.320	)	Docket No. UT- 121994
	)	DECLARATION OF TIMOTHY J. O'CONNELL IN SUPPORT OF FRONTIER'S RESPONSE TO CLEC INTERVENORS' JOINT MOTION TO DISMISS
_____	)	

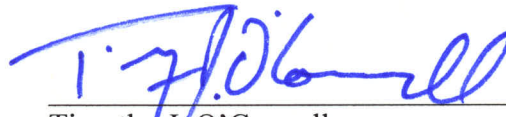
TIMOTHY J. O'CONNELL declares under penalty of perjury as follows:

1. I am over the age of eighteen and make out this Declaration based on my own personal knowledge.
2. I am one of the attorneys representing petitioner Frontier Communications Northwest Inc. in this matter.
3. On March 12, 2013, I visited the websites of the following companies, and printed out selected pages from their websites as follows: Integra Telecom, Exhibit A hereto; Level 3 Communications, Exhibit B; tw telecom, Exhibit C; Charter Fiberlink, Exhibit D.
4. On Friday, March 8, 2013, I caused certain data requests to be served on each of the CLEC Intervenors. Attached hereto as Exhibit E is a true and correct copy of the data requests served on Intervenor C beyond Communications. Virtually identical requests were simultaneously served on each of the other CLEC Intervenors. Pursuant to the Prehearing Conference Order, responses are due on March 19, 2013.
5. Frontier anticipates that it may seek leave to issue subpoenas and conduct depositions pursuant to CR 30(b)(6) of other telecommunications providers not participating in this

///

case, seeking information similar to that sought in the data requests attached as Exhibit E.

Signed under penalty of perjury under the laws of the State of Washington in Seattle,  
Washington this 14th day of March, 2013

  
\_\_\_\_\_  
Timothy J. O'Connell



## WHOLESALE PRODUCTS AND SERVICES

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**Data Networking and Internet**

**Colocation**

**Voice Communications**

EXHIBIT A  
Page 1 of 6 Pages



## WHOLESALE SOLUTIONS THAT MEET YOUR EVERY BUSINESS NEED



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You don't need another vendor. You need a partner. A partner that understands your business and its unique set of challenges. A partner that has what it takes to deliver real solutions that solve real problems. You need Integra Wholesale.

Our unique footprint, combined with our robust high-speed, long-haul fiber-optic backbone offer a foundation for expanding your reach or extending your services. Integra Wholesale delivers high-quality, reliable, secure network solutions — with award-winning service and support — to LECs/CLECs, wireless providers, resellers, data centers and content providers nationwide.

### Products and Solutions for Wholesale Customers

Our robust network and commitment to outstanding customer service deliver the ultimate experience to our Wholesale customers.

[Wholesale Products and Services](#)

[Wholesale Solutions](#)

[Wholesale Support](#)

### CONTACT US



### RELATED INFORMATION

[Wavelength Services](#)

[Ethernet Services](#)

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EXHIBIT A  
Page 2 of 6 Pages





[Home](#) > [Enterprise](#) > [Products & Services](#) > [Data Networking and Internet](#) > [Dark Fiber](#)

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## DARK FIBER FOR ENTERPRISE

Secure. Private. Cost Effective.

[Overview](#) [Business Benefits](#) [Resources \(1\)](#)

Integra's Dark Fiber is a secure and cost-effective solution that enables businesses to maintain complete control of their network with virtually-unlimited bandwidth availability. Our Dark Fiber provides you with capacity for high-bandwidth applications, diverse routing for uninterrupted connectivity, and private, secure networking for mission-critical data.

Rely on Integra for secure, cost-effective network solutions that help you and your business grow.

### CONTACT US

### FEATURED RESOURCES

[Dark Fiber Product Brief](#)  
Product Brief  
(1 MB)

### SOLUTION BRIEF

[Business Continuity and  
Disaster Recovery](#)





## PRIVATE LINE FOR ENTERPRISE

Dedicated Private Line Networking

[Overview](#) [Business Benefits](#) [Resources \(4\)](#)

Integra's private lines provide dedicated point-to-point connections. Integra offers private line networking services ranging in speeds from 1.5 Mbps to 10 Gbps, allowing for flexibility and scalability.

Integra's private lines provide dedicated private transport services to maximize data security and transmission integrity. Our high-capacity, point-to-point connections can transport voice, video, and data traffic. Integra offers private line networking services in speeds ranging from 1.5 Mbps to 10 Gbps, allowing for flexibility and scalability.

### CONTACT US

#### FEATURED RESOURCES

**Private Line Product Brief**  
Product Brief  
(1 MB)

**Online Retailer Relies on Integra's Network for Business Continuity**  
Case Study  
(1 MB)

**Expansive Footprint Ensures Cloud Access**  
Case Study  
(1 MB)

**Global Brand Finds Compelling Reason to Switch to Integra**  
Case Study  
(1 MB)





## COLOCATION

### SECURE YOUR MISSION-CRITICAL EQUIPMENT

#### Reduce Risks to Your Data and Equipment

In-house data centers, and the personnel required to run and maintain them, can be an expensive proposition for enterprises looking to trim their budgets in a tight economic environment. Now you can reach beyond the limitations of your local office space with colocation, an affordable off-site alternative to an on-site equipment closet or data center.

With Integra's colocation services, you can maintain control over your systems and data and gain access to high capacity networks not typically found in standard office buildings.

#### Protect Your Investment

Integra offers two types of colocation service. Carrier-class colocation in 25 centers and now, Data Center Colocation in Las Vegas, Nevada. The Las Vegas site, tightly coupled with our network, is SSAE 16 audited and has advanced audio and video surveillance for added security.

Colocation services eliminate the need to build and operate on-site data centers. Integra offers colocation in multiple cities, allowing you to locate your equipment in geographically diverse locations from your other offices. By doing so, you can build a regional network presence and use our service as a part of your disaster recovery plan, lowering your service outage risks because our facilities are reinforced to reduce the impact of natural disasters.

Integra Staff can work with you to determine the type of space and location that best fits your business needs and budget.

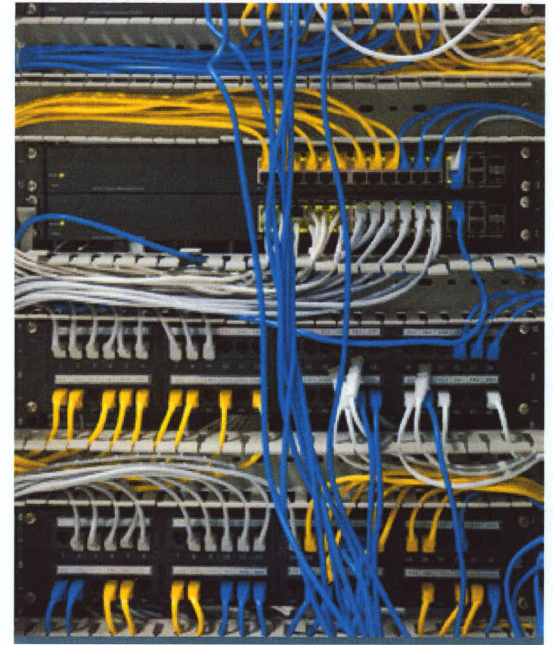
#### BUSINESS BENEFITS

- + **Access to Integra's networks** – Integra's colocation facilities are built on our extensive fiber optic network, connecting you directly to our Ethernet, high-speed Internet, or SONET services—with low latency performance so critical for any applications
- + **Conditioned space** – Advanced HVAC, fire suppression and power protect your equipment from overheating, power outages, and other environmental hazards
- + **Remote management** – Instead of dispatching one of your employees to our colocation facilities, our technicians can reboot your server for you (not available at all facilities)



## Flexible Space Options

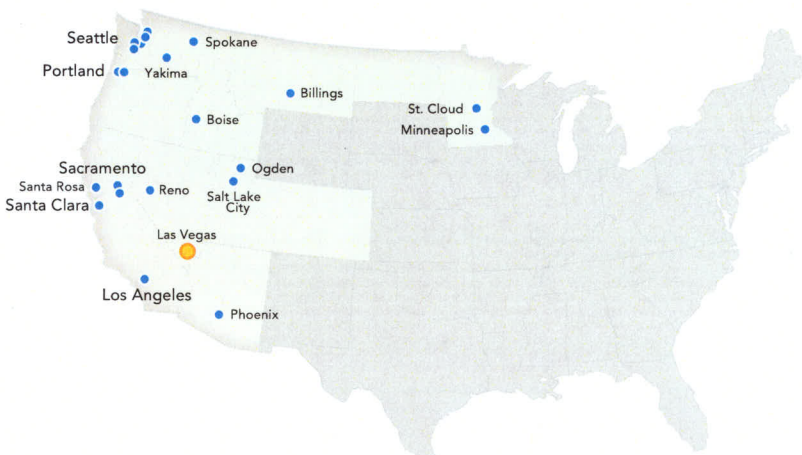
- Lockable full or partial cabinets
- 10x10 cages or custom cage configurations
- Power infrastructure\*
- Several AC power options, including 120V and 208V to best meet your needs
- Optional DC power available
- Protected power and backup generator to minimize risk of power outages
- Climate control and monitoring to ensure equipment operates at optimum temperature and humidity range
- Reliable cooling systems for a stable cooling environment
- Advanced fire suppression system to minimize risk of fire damage
- Seismic facility for earthquake protection
- Building access and security\*
- 24 x 7 building access
- Control of unauthorized access with our physical security
- 24 x 7 network and site monitoring



**CONTACT US** ▶ (877) 953-7747

### ABOUT INTEGRA™

Integra is one of the largest facilities-based providers of communication and networking services in the western United States. We connect businesses of all sizes with advanced technology solutions in 35 metropolitan markets. Integra owns and operates an enterprise-class network consisting of a 5,000-mile long-haul fiber-optic network, 3,000-miles of metropolitan fiber and a nationwide IP/MPLS network.



\*Varies by Location

EXHIBIT A  
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# WHOLESALE/CARRIER VOICE

Home > Products & Services > Voice > Wholesale/Carrier Voice

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Europe: +44(0)20 7954 5454  
Latin America: + 54 11 5170.1444  
Asia Pacific: +852 3512 5838

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## PRODUCTS & SERVICES WHOLESALE/CARRIER VOICE

- Data
- Voice
- Collaboration Services
- Enterprise Voice
- Wholesale/Carrier Voice**
- VoIP Enhanced Local
- Voice Termination
- Local Inbound
- Tandem
- Wholesale International Local Inbound
- One Plus Switched
- Wholesale Toll Free

Value is paramount. You require the best quality service, but you need it at price that doesn't kill your bottom line. Whether you're a reseller, hoster, or a voice service provider, we understand that providing a high-quality service while managing margins can be a challenge. Finding a trusted voice service provider that offers a full suite of secure and competitive voice services is top of mind.

Level 3's Wholesale Voice Services offer you a reliable and secure solution that enables you to grow into new markets, simplify networks or maintain your current business model more efficiently. Level 3 serves 18 of the world's top 20 Telecom Carriers and can provide you with the scale, knowledge and experience you expect with a network you can trust.

### VOIP ENHANCED LOCAL

Find out how you can give your customers IP-based local communications services using your own Class 5 switching infrastructures. Add competitive features to the Level 3 VoIP Enhanced Local service and quickly expand into new markets. With Level 3, you'll retain control over end-user features and billing.

### VOICE TERMINATION

Access interconnection and termination options delivered over our powerful voice network, which gives us the operational control to ensure end-to-end quality management of your voice traffic. Our integrated TDM and IP voice capabilities deliver on the promise of convergence.

### LOCAL INBOUND

Uncover opportunities for connecting customers, building revenue and reinforcing customer relationships with the Level 3 Local Inbound service. Local calls are transported on the Public Switched Telephone Network (PSTN) and terminated at your IP endpoint, giving you the control to create new products and services through VoIP.

### TANDEM

To stay competitive, carriers must increase their overall network performance and become more efficient to grow their bottom lines. The Level 3 Tandem service provides LEC replacement for inbound long-distance and outbound toll-free (8YY) calls to and from your TNs — to help you save money so you can reinvest into new growth opportunities.

### WHOLESALE INTERNATIONAL LOCAL INBOUND

Gaining a local presence in new global markets is key to establishing yourself in those areas and growing your business. The Level 3 Wholesale International Local Inbound (ILI) service is designed to be your foundation for capitalizing on new global opportunities by offering local telephone numbers across Europe, Asia and Latin America.

## FEATURED RESOURCES



Services Matrix by Market

## CONNECT WITH LEVEL 3

Subscribe and Stay Up to Date

- Video
- Security
- Managed and Professional Services
- Cloud and IT Services

## ONE PLUS SWITCHED

With Level 3 One Plus Switched services, you can receive industry-leading quality over a secure, cutting-edge network infrastructure, enabling you to enhance your customer portfolio, improve operations, and most importantly, grow your revenue.

## WHOLESALE TOLL FREE

The quality of your toll-free calls is crucial to your business. With the Level 3 Toll Free service suite, your calls bear the quality of our origination and termination capability. We help you become more efficient and migrate from TDM to VoIP with a large voice footprint. And it's all offered at a competitive price.

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North America: Sales: 1-877-2LEVEL3 | [Contact Us](#) | Technical Support: 1-877-4Level3 | International Network Operations Center: 1-888-NOC-INTL

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EXHIBIT B  
Page 2 of 5 Pages



Level 3<sup>®</sup> Transport Services offer a number of advantages to customers with our extensive on-net footprint, industry-leading diversity and latency performance, custom-designed optical solutions, and our willingness to build fiber to customer locations. Level 3 has the responsiveness, agility and customer focus of a small carrier with the resources, bandwidth and network of the largest carriers.

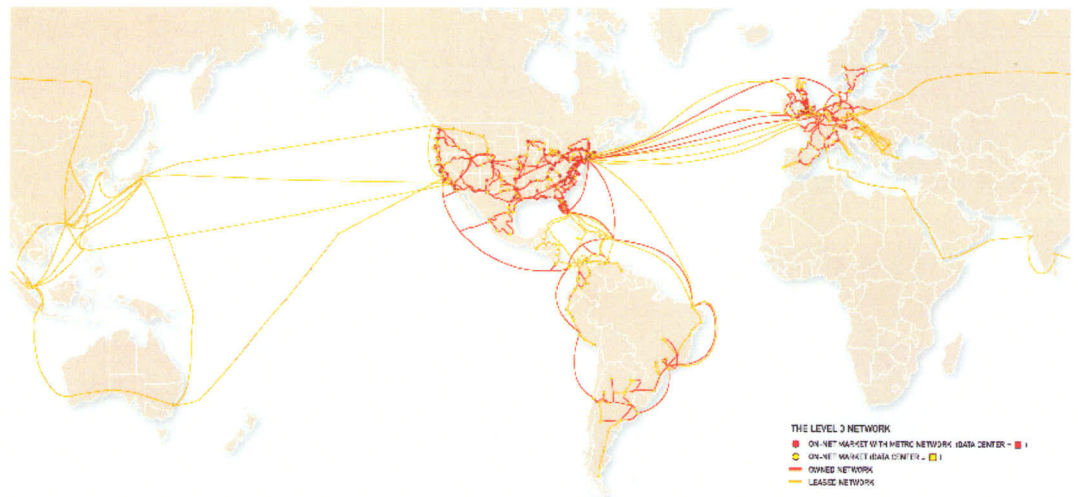
## Level 3 Private Line Service

### Connecting Your World with Reliable, Dedicated Bandwidth

Moving data is serious business, whether information is flowing from Chicago to Los Angeles, from Frankfurt to Paris, or from Mexico City to Buenos Aires. If you need absolute reliability and security, a dedicated circuit that offers an end-to-end solution is the right choice for your business. The Level 3<sup>®</sup> Private Line solution offers a secure, dedicated service with the flexibility and reach required for your most sensitive traffic. Private Line provides enhanced reliability through the use of SONET and SDH architectures. Build your business networks with confidence. Run with the power and reliability of Level 3's worldwide, seamless backbone.

#### Business Solutions

- **Global Connectivity:** Level 3 Private Line services can be delivered worldwide on owned fiber networks across three continents in more than 45 countries.
- **Security:** Private Line services offer dedicated bandwidth for high-priority business applications, such as voice and video traffic, using trusted SONET and SDH architectures for unmatched performance.
- **Reliability:** Level 3 Private Line architecture provides fully diverse paths for transport and immediate restoration in case of outages.
- **Flexibility:** Private Line services are protocol independent and can carry IP, voice, data and video as Layer 2 or Layer 3 traffic.



01PLN03



## Technical Features / Capabilities

- Speeds (availability varies by region): E-1, E-3, T-1, DS-1, DS-3, OC-3, OC-12, OC-48, STM-1, STM-4, STM-16
- Multiple configurations, including point-to-point and hub and endlink
- Fully mirrored, 24 x 7 Network Operations Centers (NOCs)
- Fully staffed Field Operations groups in each market
- SLA support for up to 99.999 percent network availability

## Why Choose Level 3 for Private Line Service?

- End-to-End Global Reach: Level 3 offers a unique global services platform, anchored by owned fiber networks on three continents in more than 45 countries, connected by extensive undersea cables. We deliver "local to global to local" service to customers, on a platform combining local metro, intercity and international infrastructure.

- Comprehensive Customer Experience – Making Business Easier: Level 3 is committed to providing a differentiated customer experience. It's about understanding our customers' business challenges and addressing them with the most relevant solutions. We are dedicated to supporting your current and future business growth needs with easy ordering and quoting processes, market-leading speeds and services, and the convenience and control you need via a customer portal.
- Reliable and Scalable Network: Designed to enhance coverage, performance and flexibility by providing services that enable next-generation technology. Our IP network delivers the performance and value necessary to support critical business applications that enable connectivity among employees, customers and partners.

*Level 3 Private Line can be configured point-to-point within a metro market or between metro markets over Level 3's intercity network.*

### ABOUT LEVEL 3

As a leading international provider of fiber-based communications services, we are dedicated to helping our customers keep pace with the demands of an increasingly networked world.

We couple a broad service portfolio with a scalable end-to-end network to deliver a set of solutions built for the 21st century.

To find out how Level 3 can be your single-provider solution for all of your business needs, contact us today:

1.877.2LEVEL3

info@level3.com

www.level3.com



# MANAGED DEDICATED FIBER

Home > Products & Services > Managed and Professional Services > Managed Dedicated Fiber

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## GET IN TOUCH

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Europe: +44(0)20 7954 5454  
Latin America: + 54 11 5170.1444  
Asia Pacific: +852 3512 5838

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## PRODUCTS & SERVICES MANAGED DEDICATED FIBER

- Data
- Voice
- Video
- Security
- Managed and Professional Services**
- Managed Router
- Application Performance Management
- Managed WAN Optimization
- Smart Demarcation for Ethernet VPNs
- Managed Ethernet Access
- Managed Dedicated Fiber**
- Managed Voice
- Professional Services
- Cloud and IT Services

As you increase your leased bandwidth, you also increase your ongoing expenses. Depending on the amount of growth you experience, an investment in a facilities-based network can serve long-term needs while providing rapid payback.

With Level 3<sup>®</sup> Managed Dark Fiber solutions, you gain the benefits of network ownership without having to construct the physical network yourself, for both metro and intercity routes. Our Managed Dark Fiber solutions combine Level 3<sup>®</sup> Dark Fiber and Professional Services for true bandwidth management.

By owning or leasing your own Managed Dark Fiber, you make the decisions – with our expert guidance – and you maintain control over your optronics. Level 3 Communications then deploys and provides ongoing network monitoring and management based on your individual requirements. Plus, we are committed to diversity, which gives you options for diverse routing, fiber reconfiguration, splicing and cross-connects.

### Managed Dedicated Fiber Solutions Benefits

Gain control over your network, help manage costs, capacity, performance and technology.

Lean on Level 3's experience to manage everything from the initial planning and design, to permitting and construction project management, to installation and ongoing management.

Utilize the flexibility and customization available to you based on your individual dark fiber and equipment needs.

### Managed Dedicated Fiber Solutions Details

Custom network infrastructure built by Level 3's team of professional planners and engineers

Professional Services support for all aspects of optical network construction, design, implementation and ongoing management

Multi-conduit, high-fiber-count infrastructure available as leased fiber or IRU

Extensive network reach with 70,000 route miles of intercity dark fiber assets connecting 320 markets and 30,000 route miles of metro dark fiber

In the rare case that we don't have the dark fiber you need, we are often willing to build it based on your specifications

### FOR MORE DETAILS:

 [Download the Brochure](#)

[Tell us more about you and your business needs](#)

### FEATURED RESOURCES



Level 3 and Ciena: Customized Optical and Ethernet Networks

### CONNECT WITH LEVEL 3

Subscribe and Stay Up to Date

Have questions? Need more details?  
Tell us your needs and get fast answers.

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[solutions](#)

[intelligent network](#)

[why tw telecom?](#)

[about](#)

[support](#)

## solutions

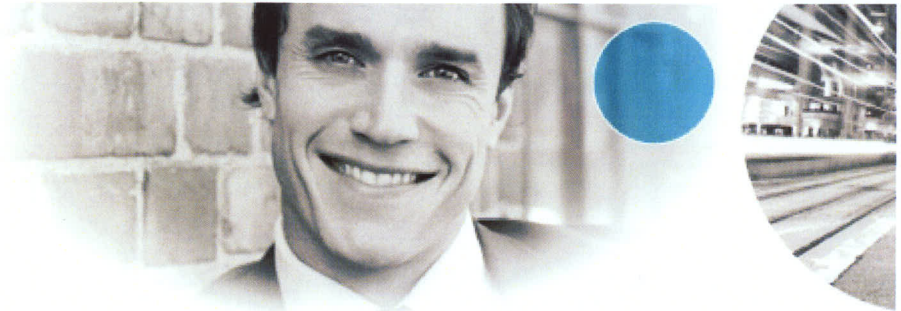
[Solving Business Problems](#)

[By Industry](#)

[By Product Type](#)

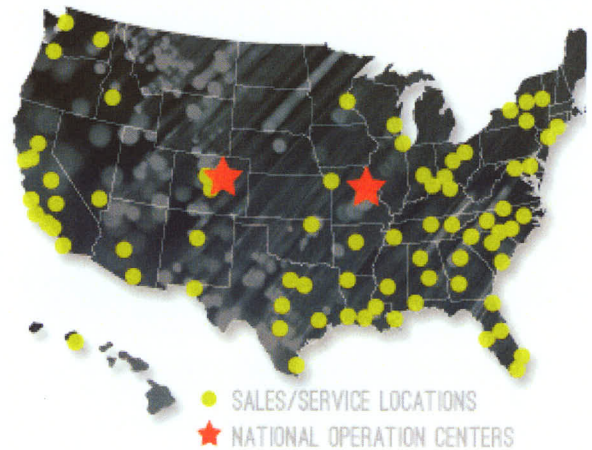
[Channel Partners](#)

[Wholesale](#)



## wholesale

At **tw telecom**, you'll find our award-winning Carrier Ethernet services, with reliable, scalable and competitively priced infrastructure that expands your reach—all backed by our top-notch service and support.



[at a glance](#)

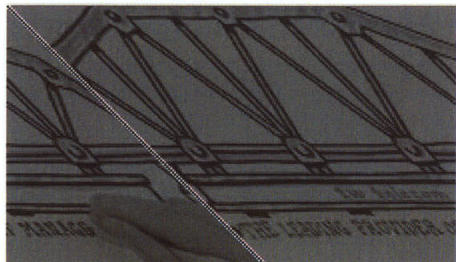
[wholesale services](#)

[Carrier Connex](#)

- **2011 Frost and Sullivan Carrier Ethernet Award** Growth Leadership Winner.
- Unique combination of nationwide networks to deliver innovative data services
- Largest competitive provider of fiber based solutions in the U.S. with more than 18,000 on-net buildings.
- Extensive enterprise and 3rd party data center connectivity.
- 27,000+ route miles of fiber; sales and service operations for 75 markets.
- Ethernet ubiquity across 75 markets.
- More than 2,300 connected Local Serving Offices (LSOs).
- Connected to 400+ third party data centers.
- MPLS and Native Ethernet offerings.
- Portal tools that enable a superior, real time customer experience.

- Customer-focused account teams dedicated to delivering the right wholesale solutions at the right time to move your business forward.

## Intelligent Network



Learn more about how **tw telecom's** Intelligent Network can move your business forward.

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[site map](#)

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March 12, 2013

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**The Life-and-Death Reality of a Reliable Healthcare Network**

March 07, 2013

**The Cloud: How are You Getting There?**

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Enterprise

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- Ethernet
- Layer 3 VPN
- Optical Transport

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Request Product Information

Charter Business® Carrier Solutions



Charter Business® Carrier Solutions makes it easy to deliver your services over a state-of-the-art, enterprise-level fiber network. With thousands of miles of infrastructure and end-to-end operations backed by 24/7/365 support from the Charter Business Network Operations Center, we can power your business with fiber-optic Ethernet, TDM local loops, and core network transport.



ONE ADVANCED NETWORK

With an advanced fiber optic network, covering 27 states across the nation, we have the ability to manage the business efficiently and reliably.

ONE POWERFUL SOLUTION

Get solutions built around your business that can be implemented in a timely fashion. With less red tape to deal with and the ability to respond quickly and nimbly, we address your needs fast.

ONE COST-EFFECTIVE DECISION

With a single provider to oversee and address all of your network needs, you can lower expenses and reduce dependence on competitors.

ONE POINT OF CONTACT

A dedicated carrier/wholesale representative will work with you to find the right solutions quickly and efficiently—from overseeing sales opportunities to customer support.

WHAT SERVICES DO WE OFFER?

- Data Networking Services
  - Ethernet (up to 10 Gbps)
  - SONET & TDM Transport (up to OC-192)

Find service

Enter ZIP to determine Serviceability.

Enter your ZIP code

Contact Us

SALES: 888.692.8635

SUPPORT: 800.314.7195



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(2.5 Gbps  
and 10 Gbps)
- Virtual Private  
Networking
- Internet Services (up to 1  
Gbps)



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**SUPPORT: 800.314.7195**

EXHIBIT D  
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**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	
	)	DOCKET UT-121994
FRONTIER COMMUNICATIONS	)	
NORTHWEST INC.,	)	
	)	FIRST SET OF DATA
To be Regulated as a Competitive	)	REQUESTS FROM FRONTIER
Telecommunications Company	)	COMMUNICATIONS
Pursuant to RCW 80.36.320	)	NORTHWEST, INC. TO
	)	CBEYOND
	)	COMMUNICATIONS LLC
.....	)	

1. Pursuant to Order No. 2, paragraph 8 in this docket and to Washington Administrative Code (WAC) 480-07-405, Frontier Communications Northwest, Inc. propounds the following data requests to Cbeyond Communications LLC.
2. Due date: Pursuant to Order No. 2, paragraph 8<sup>1</sup> responses to these data requests are due by March 19, 2013. Delivery by email is acceptable.

**DEFINITIONS AND INSTRUCTIONS**

3. The term “Commission” used in these data requests means the Washington Utilities and Transportation Commission.
4. The term “Cbeyond” means Cbeyond Communications LLC.
5. The term “Affiliate” used in these data requests means every corporation, partnership, limited liability corporation, limited partnership or any other form of business entity and person owning or holding directly or indirectly five percent or more of the voting securities or other indicia of ownership or control of Cbeyond; every corporation, partnership, limited liability corporation, limited partnership or any other form of business entity and person, other than those specified previously in any chain of successive ownership of five percent or more

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<sup>1</sup> “(1) a party providing responses to data requests must serve those responses on all other parties; (2) responses to data requests served the date the direct testimony is filed to the date responsive testimony is filed are due within seven business days; and (3) responses to data requests served the date the response testimony is filed to the date the evidentiary hearings begin are due within three business days.”

of voting securities or other indicia of ownership or control, the chain beginning with the holder of the voting securities or other indicia of ownership or control of Cbeyond; every corporation, partnership, limited liability corporation, limited partnership or any other form of business entity five percent or more of whose voting securities or other indicia of ownership or control are owned by any person or corporation, partnership, limited liability corporation, limited partnership or any other form of business entity owning five percent or more of the voting securities or other indicia of ownership or control of Cbeyond or by any person or corporation, partnership, limited liability corporation, limited partnership or any other form of business entity in any such chain of successive ownership of five percent or more of voting securities or other indicia of ownership or control; every corporation, partnership, limited liability corporation, limited partnership or any other form of business entity or person with which Cbeyond has a management or service contract; and every person who is an officer or director of Cbeyond or of any corporation, partnership, limited liability corporation, limited partnership or any other form of business entity in any chain of successive ownership of five percent or more of voting securities or other indicia of ownership or control.

6. The term “Petition” refers to Frontier Communications Northwest, Inc’s Replacement Amended Petition for Approval of Minimal Regulation in Accordance with RCW 80.36.320, filed January 24, 2013.
7. The term “Frontier” refers to Frontier Communications Northwest Inc.
8. The term “Frontier wire center” means any Frontier central office as defined in WAC 480-120-021 or comparable facility.
9. The term “Gipson Declaration” refers to the Declaration of Carl Gipson, dated December 21, 2012, which was attached to the Petition.
10. The term “Services” means any of the following: “telecommunications service” as defined in RCW 82.04.065(27), Voice over Internet Protocol (“VoIP”), “mobile telecommunications services” as defined in RCW 82.04.065(15), other services capable of transmitting or receiving voice communications, Internet



access service, cable TV, or video services, regardless of the technology or protocol used to provide such services.

11. The term “Telecommunications Service” means the services and products as defined in RCW 82.04.065(27).
12. These data requests are continuing in nature: the party responding shall promptly supplement its responses to the extent it becomes aware of information that makes any response inaccurate or incomplete.
13. For each of the following data requests, provide the names, titles, and employer of the persons preparing the response.
14. Provide the requested information in native, executable format (*e.g.*, Excel, Word) to the extent possible.

### **DATA REQUESTS**

**REQUESTED BY: Counsel for Frontier**

#### **FRONTIER DATA REQUEST NO. 1.**

**Re: Corporate Information**

Identify the state of incorporation and states in which Cbeyond does business.

#### **FRONTIER DATA REQUEST NO. 2.**

**Re: Corporate Information**

Describe if Cbeyond is licensed, franchised, or certificated by any Washington state, county, municipal, or other government entity and identify the date and provide a copy of any such license, franchise agreement, or certification.

#### **FRONTIER DATA REQUEST NO. 3.**

**Re: Corporate Information**

Provide a corporate organization chart identifying the Affiliates of Cbeyond.



**FRONTIER DATA REQUEST NO. 4.**

**Re: Services Provided**

Identify each entity in the response to Data Request No. 3 that operates in the state of Washington and describe the nature of the business operations and whether it provides Services as defined above.

**FRONTIER DATA REQUEST NO. 5.**

**Re: Services Provided**

For each entity identified in the response to Data Request No. 3 that operates in the State of Washington, including if applicable Cbeyond, identify and describe each and every one of the Services it provides in the State of Washington

**FRONTIER DATA REQUEST NO. 6.**

**Re: Services Provided**

For Cbeyond, and any Affiliate of Cbeyond that operates in the State of Washington, identify and provide an itemized description and list of each of the services and products Cbeyond sells, offers, or provides to its customers in the State of Washington that are Telecommunications Services.

**FRONTIER DATA REQUEST NO. 7.**

**Re: Services Provided**

For Cbeyond, and any Affiliate of Cbeyond that operates in the State of Washington, identify and provide an itemized description and list of each of the VoIP services and products Cbeyond sells, offers, or provides to its customers in the State of Washington.

**FRONTIER DATA REQUEST NO. 8.**

**Re: Geographic Scope of Services Provided**

For Cbeyond, identify each city, county, or other political subdivision in which Cbeyond offers or provides any of the Services and list the specific services and products provided in each geographic subdivision.

**FRONTIER DATA REQUEST NO. 9.**

**Re: Geographic Scope of Services Provided**

For any Affiliate of Cbeyond providing any of the Services in Washington, identify each city, county, or other political subdivision in which Cbeyond offers or provides any of the Services and list the specific services and products provided in each geographic subdivision.

**FRONTIER DATA REQUEST NO. 10.**

**Re: Geographic Scope of Services Provided**

For Cbeyond, identify each Frontier wire center in which Cbeyond offers or provides Telecommunications Services and/or VoIP services and list the specific services and products provided in each Frontier wire center.

**FRONTIER DATA REQUEST NO. 11.**

**Re: Geographic Scope of Services Provided**

For Cbeyond, identify each Frontier wire center in which Cbeyond offers or provides services and products other than Telecommunications Services and/or VoIP services and list the specific services and products provided in each Frontier wire center.

**FRONTIER DATA REQUEST NO. 12.**

**Re: Geographic Scope of Services Provided**

For any Affiliate of Cbeyond providing any of the Services in Washington identify each Frontier wire center in which Cbeyond offers or provides Services and list the specific services and products provided in each Frontier wire center.

**FRONTIER DATA REQUEST NO. 13.**

**Re: Quantification of Services Provided**

For Cbeyond, identify the aggregate number of customers and quantity or units of services and products Cbeyond provided in Washington as of December 31, 2010, December 31, 2011, and December 31, 2012. To the extent Cbeyond maintains data differentiating the number of customers and quantity or units of services and products provided, including, but not limited to, any of the Services, provide a breakdown of the

number of customers and quantity or units of services and products Cbeyond provided in Washington as of the dates identified above.

**FRONTIER DATA REQUEST NO. 14.**

**Re: Quantification of Services Provided**

To the extent Cbeyond, and any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating the number of customers and quantity or units of the Services by any type of geographic subdivision, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, identify the number of customers and access equivalent lines Cbeyond, and/or any Affiliate of Cbeyond that provides Telecommunications Services or VoIP services in the State of Washington, provided as of December 31, 2010, December 31, 2011, and December 31, 2012 in each geographic subdivision.

**FRONTIER DATA REQUEST NO. 15.**

**Re: Quantification of Services Provided**

To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in the State of Washington, maintains data differentiating the number of customers and quantity or units of the Services by any type of geographic subdivision, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify the number of customers and quantity or units of services or products Cbeyond, and/or any Affiliate of Cbeyond that provides Services in the State of Washington, for each of the following categories of services and products as of December 31, 2010, December 31, 2011, and December 31, 2012 in each geographic subdivision: (i) voice service; (ii) data services; (iii) other Telecommunications Services; (iv) VoIP; (v) Internet access; (vi) cable TV; or (vii) other video.



**FRONTIER DATA REQUEST NO. 16.**

**Re: Tariffs**

Identify and provide a copy of any tariff Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in the State of Washington, has filed or maintain with the Commission for any of the Services.

**FRONTIER DATA REQUEST NO. 17.**

**Re: Tariffs**

Identify and provide a copy of any tariff Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in the State of Washington, has filed, or maintains with the Federal Communications Commission for any of the Services in Washington.

**FRONTIER DATA REQUEST NO. 18.**

**Re: Price List or Catalog**

Identify and provide a copy of any publicly available price list or catalog Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in the State of Washington, maintains identifying the rates, terms, and conditions associated with any of the Services Cbeyond and/or any Affiliate of Cbeyond that provides any of the Services in Washington offers or provides in Washington.

**FRONTIER DATA REQUEST NO. 19.**

**Re: Filed Reports**

Identify and provide a copy of any quality of service data or report Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, has filed with the Commission for any of the Services.

**FRONTIER DATA REQUEST NO. 20.**

**Re: Filed Reports**

Identify and provide a copy of any annual report or other report Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in the State of Washington, has filed with the Commission related to or during 2010, 2011, and 2012.

**FRONTIER DATA REQUEST NO. 21.**

**Re: Financial Statements**

Provide a copy of Cbeyond's financial statements, including revenue and expenses, for Services provided in the State of Washington for 2010, 2011, and 2012. To the extent Cbeyond differentiates or maintains separate financial data related to Telecommunications Services, VoIP, and other Services in the State of Washington, identify, and provide separate reports identifying revenues and expenses for each of these services for each year.

**FRONTIER DATA REQUEST NO. 22.**

**Re: Quantities of Services Provided by Area**

To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in the State of Washington, maintains data differentiating the number of customers and quantity or units of services or products provided for any of the Services by any type of geographic subdivision, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify the number of customers and quantity or units of product or service Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in the State of Washington, provided each of the following categories services and products as of December 31, 2010, December 31, 2011 and December 31, 2012 in each geographic subdivision: (i) voice service; (ii) data services; (iii) other Telecommunications Services; (iv) VoIP; (v) Internet access; (vi) cable TV; or (vii) other video.

**FRONTIER DATA REQUEST NO. 23.**

**Re: Promotional Materials**

Provide a copy of all marketing, advertising, and promotional materials Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington has distributed, communicated or otherwise made available to existing or potential customers in Washington, including, but not limited to mailings, bill inserts, TV, radio and newspaper ads, billboards and Internet, website, or email offerings in Washington

since January 1, 2011, that advertises, markets, promotes any of the Services in the State of Washington. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating marketing, advertising and promotional materials by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area or other political subdivision in the State of Washington, separately identify and list which marketing, advertising, and promotional materials were used in each geographic subdivision.

**FRONTIER DATA REQUEST NO. 24.**

**Re: Promotional Materials**

With respect to any of the marketing, advertising, or promotional activities identified in your response to Data Request No. 23, identify and describe any filing or approval request submitted or filed with the Commission related to the promotional activity and list and provide a copy of each filing or approval request.

**FRONTIER DATA REQUEST NO. 25.**

**Re: Telephone Number Port Requests**

Identify the number and provide a list of each telephone number port request Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, has initiated either on behalf of itself, an Affiliate, or third party with Frontier during each month since January 1, 2011. To the extent Cbeyond and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating ports by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the number of ports for each geographic subdivision.

**FRONTIER DATA REQUEST NO. 26.**

**Re: Residential Consumer Information**

Identify the number and provide a list of each residential consumer subscribing to a Telecommunications Service or VoIP service that is or was a customer of Cbeyond,



and/or any Affiliate of Cbeyond that provides any of the Services in Washington, since January 1, 2011, in Frontier's service territory in Washington. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating residential customers by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and quantify the number of customers and equivalent service lines for each geographic subdivision. In addition, for each customer identified in this response, differentiate and identify the number of customers and equivalent service lines that Cbeyond and/or any Affiliate of Cbeyond that provides any of the Services in Washington provides services using: (i) Cbeyond's or an Affiliate's network and facilities up to interconnection with the public network; (ii) other than Frontier, a third party's network and facilities up to interconnection with the public network; (iii) Frontier provided unbundled network elements; (iv) Frontier resold services; and (v) other Frontier provided services.

**FRONTIER DATA REQUEST NO. 27.**

**Re: Residential Consumer Information**

Identify the number and provide a list of each residential consumer and equivalent service lines subscribing to a voice or VoIP service that is or was customer of Cbeyond and/or any Affiliate of Cbeyond that provides any of the Services in Washington, since January 1, 2011, that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, knows or has reason to know was previously a customer of Frontier in Washington. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating residential customers by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the residential customers and quantify the number of equivalent service lines for each geographic subdivision.

**FRONTIER DATA REQUEST NO. 28.**

**Re: Business Consumer Information**

Identify the number and provide a list of each business consumer and equivalent service lines subscribing to a Telecommunications Service or VoIP service that is or was customer of Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, since January 1, 2011, in Frontier's service territory in Washington. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating business customers by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the business customers and quantify the number of equivalent service lines for each geographic subdivision. In addition, for each customer identified in this response, differentiate and identify the number of customers and equivalent service lines that Cbeyond and/or any Affiliate of Cbeyond that provides any of the Services in Washington provides services using: (i) Cbeyond's or an Affiliates network and facilities up to interconnection with the public network; (ii) other than Frontier, a third party's network and facilities up to interconnection with the public network; (iii) Frontier provided unbundled network elements; (iv) Frontier resold services; and (v) other Frontier provided services.

**FRONTIER DATA REQUEST NO. 29.**

**Re: Business Consumer Information**

Identify the number and provide a list of each business consumer and equivalent service lines subscribing to a Telecommunications Service or VoIP service that is or was customer of Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, since January 1, 2011, that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, knows or has reason to know was previously a customer of Frontier in Washington. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating business customers by any type of geographic subdivisions, including



city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and quantify the number of equivalent service lines for each geographic subdivision.

**FRONTIER DATA REQUEST NO. 30.**

**Re: Business Consumer Information**

Identify the number and provide a list of each business consumer subscribing to a data or Internet access service that is or was customer of Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, since January 1, 2011, in Frontier's service territory in Washington. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating business customers by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the business customers and quantity or units of service or product provided in each geographic subdivision. In addition, for each customer identified in this response, differentiate and identify the number of customers and equivalent service lines that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides services using: (i) Cbeyond's or an Affiliates network and facilities up to interconnection with the public network; (ii) other than Frontier, a third party's network and facilities up to interconnection with the public network; (iii) Frontier provided unbundled network elements; (iv) Frontier resold services; and (v) other Frontier provided services.

**FRONTIER DATA REQUEST NO. 31.**

**Re: Business Consumer Information**

Identify the number and provide a list of each business consumers subscribing to a data or Internet access service, that is or was customer of Cbeyond since January 1, 2011, that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, knows or has reason to know was previously a customer of Frontier in Washington. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any



of the Services in Washington, maintains data differentiating business customers by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the business customers and quantity or units of service or product provided for each geographic subdivision.

**FRONTIER DATA REQUEST NO. 32.**

**Re: Communications Provider Customer Information**

Identify the number and provide a list of each telecommunications company, including commercial mobile radio service providers, local exchange carriers, Internet service providers, and cable TV companies, operating in Washington that is, or was, a customer of Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, since January 1, 2011, in Frontier's service territory in Washington and identify the specific wholesale services and quantity or units of services Cbeyond. and/or any Affiliate of Cbeyond that provides Telecommunications Services in the State of Washington, provides or has provided to each telecommunications company since January 1, 2011. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating telecommunications company by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the telecommunications company customers and purchased services for each geographic subdivision.

**FRONTIER DATA REQUEST NO. 33.**

**Re: Intrastate Special Access Services**

Based on Cbeyond, and/or any Affiliate of CBeyond that provides any of the Services in Washington's, records, identify the number and provide a list of each intrastate special access service, including, but not limited to, DS1, DS,3 and other access circuits, Cbeyond purchases from Frontier in Frontier's service territory since January 1, 2011. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the

Services in Washington, maintains data differentiating special access services by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the special access services for each geographic subdivision. In addition, for each service identified in this response, list and identify the number of customers that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides services using that service by geographic subdivision.

**FRONTIER DATA REQUEST NO. 34.**

**Re: Intrastate Special Access Services**

For the period since July 1, 2010, to the present, identify any circumstance in which Cbeyond at one time purchased an intrastate special access service from Frontier and then disconnected, migrated, replaced, or substituted that service with or using: i) Cbeyond's own network facilities or ii) a third party's network facilities. For each circumstance identify: (i) the specific Frontier circuit or service purchased including the circuit identification number and address of the Frontier circuit or service; (ii) a description of Cbeyond or third party's network facility that the circuit or service was moved to; (iii) an explanation or rationale why the service was migrated to Cbeyond or the third party's network facility; and (iv) any cost or pricing analysis comparing the cost of the Frontier service to the cost of Cbeyond or third party's facility.

**FRONTIER DATA REQUEST NO. 35.**

**Re: Intrastate Special Access Services**

Identify the number and provide a list of each intrastate special access service, including but not limited to DS1, DS3, and other access circuits, Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, purchases from another carrier or service provider in Frontier's service territory since January 1, 2011. For each circumstance also identify: (i) a description of the third party's network facility, including the address or end points of the facility; (ii) an explanation or rationale why the third party's network facility is utilized in lieu of Frontier's network; and (iii) any



cost or pricing analysis comparing the cost of the Frontier service to the cost of the third party's facility. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating special access services by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the special access services for each geographic subdivision. In addition, for each service identified in this response, list and identify the number of customers that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides Services using that service by geographic subdivision.

**FRONTIER DATA REQUEST NO. 36.**

**Re: Interstate Special Access Services**

Based on Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington's records, identify the number and provide a list of each interstate special access service, including but not limited to DS1, DS3, and other access circuits, Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, purchases from Frontier in Frontier's service territory since January 1, 2011. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides Telecommunications Services in Washington, maintains data differentiating special access services by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the special access services for each geographic subdivision. In addition, for each service identified in this response, list and identify the number of customers that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides Telecommunications Services using that service by geographic subdivision.



**FRONTIER DATA REQUEST NO. 37.**

**Re: Interstate Special Access Services**

For the period since July 1, 2010, to the present, identify any circumstance in which Cbeyond at one time purchased an interstate special access service from Frontier and then disconnected, migrated, replaced, or substituted that service with or using: i) Cbeyond's own network facilities or ii) a third party's network facilities. For each circumstance identify: (i) the specific Frontier circuit or service purchased including the circuit identification number and address of the Frontier circuit or service; (ii) a description of Cbeyond or third party's network facility that the circuit or service was moved to; (iii) an explanation or rationale why the service was migrated to Cbeyond or the third party's network facility; and (iv) any cost or pricing analysis comparing the cost of the Frontier service to the cost of Cbeyond or third party's facility.

**FRONTIER DATA REQUEST NO. 38.**

**Re: Interstate Special Access Services**

Identify the number and provide a list of each interstate special access service, including but not limited to DS1, DS3, and other access circuits, Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, purchases from another carrier or service provider in Frontier's service territory since January 1, 2011. For each circumstance also identify: (i) a description of the third party's network facility, including the address or end points of the facility; (ii) an explanation or rationale why the third party's network facility is utilized in lieu of Frontier's network; and (iii) any cost or pricing analysis comparing the cost of the Frontier service to the cost of the third party's facility. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides Telecommunications Services in Washington, maintains data differentiating special access services by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the special access services for each geographic subdivision. In addition, for each service identified in this response, list and identify the number of customers that Cbeyond, and/or any Affiliate of Cbeyond that provides

Telecommunications Services in Washington, provides services using that service by geographic subdivision.

**FRONTIER DATA REQUEST NO. 39.**

**Re: Unbundled Network Element Information**

Based on Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington's, records, identify the number and provide a list of each unbundled network element Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, purchases from Frontier in Frontier's service territory since January 1, 2011. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating unbundled network elements by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the unbundled network elements for each geographic subdivision. In addition, for each service identified in this response, list and identify the number of customers and quantity or units of service or product that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides services using that service by geographic subdivision.

**FRONTIER DATA REQUEST NO. 40.**

**Re: Unbundled Network Element Information**

For the period since July 1, 2010, to the present, identify any circumstance in which Cbeyond at one time purchased an unbundled network element from Frontier and then disconnected, migrated, replaced or substituted that service with or using: i) Cbeyond's own network facilities or ii) a third party's network facilities. For each circumstance identify: (i) the specific Frontier unbundled network element or service purchased including the unbundled network element identification number and address of the Frontier UNE or service; (ii) a description of Cbeyond or third party's network facility that the UNE or service was moved to; (iii) an explanation or rationale why the service was migrated to Cbeyond or the third party's network facility; and (iv) any cost or



pricing analysis comparing the cost of the Frontier service to the cost of Cbeyond or third party's facility.

**FRONTIER DATA REQUEST NO. 41.**

**Re: Resold Services**

Based on Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington's, records, identify the number and provide a list of each resold service Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, purchases from Frontier in Frontier's service territory since January 1, 2011. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating resold services by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area or other political subdivision in the State of Washington, separately identify and list the unbundled network element for each geographic subdivision. In addition, for each service identified in this response, list and identify the number of customers and quantity or units of service or products that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides using that service by geographic subdivision.

**FRONTIER DATA REQUEST NO. 42.**

**Re: Resold Services**

For the period since July 1, 2010 to the present, identify any circumstance in which Cbeyond at one time purchased resold service from Frontier and then disconnected, migrated, replaced or substituted that service with or using: i) Cbeyond's own network facilities or ii) a third party's network facilities. For each circumstance identify: (i) the specific Frontier circuit or service purchased including the circuit identification number and address of the Frontier circuit or service; (ii) a description of Cbeyond or third party's network facility that the circuit or service was moved to; (iii) an explanation or rationale why the service was migrated to Cbeyond or the third party's network facility;



and (iv) any cost or pricing analysis comparing the cost of the Frontier service to the cost of Cbeyond or third party's facility.

**FRONTIER DATA REQUEST NO. 43.**

**Re: Commercial Agreements**

Based on Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington's, records, identify the number and provide a list of each service Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, purchases from Frontier pursuant to a commercial agreement (*e.g.*, Wholesale Advantage Agreement) in Frontier's service territory since January 1, 2011. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating such services by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the services for each geographic subdivision. In addition, for each service identified in this response, list and identify the number of customers and quantity or units of service or product that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides services using that service by geographic subdivision.

**FRONTIER DATA REQUEST NO. 44.**

**Re: Commercial Agreements**

For the period since July 1, 2010 to the present, identify any circumstance in which Cbeyond at one time purchased service from Frontier pursuant to a commercial agreement and then disconnected, migrated, replaced or substituted that service with or using: i) Cbeyond's own network facilities or ii) a third party's network facilities. For each circumstance identify: (i) the specific Frontier circuit or service purchased including the circuit identification number and address of the Frontier circuit or service; (ii) a description of Cbeyond or third party's network facility that the circuit or service was moved to; (iii) an explanation or rationale why the service was migrated to Cbeyond

or the third party's network facility; and (iv) any cost or pricing analysis comparing the cost of the Frontier service to the cost of Cbeyond or third party's facility.

**FRONTIER DATA REQUEST NO. 45.**

**Re: Collocation Services**

Based on Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington's, records, identify the number and provide a list of each collocation service Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, purchases from Frontier in Frontier's service territory since January 1, 2011. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating collocation services by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the collocation service for each geographic subdivision.

**FRONTIER DATA REQUEST NO. 46.**

**Re: Dark Fiber**

Identify the number and provide a list of dark fiber Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, purchases, leases or otherwise acquires the right to use from third parties in Frontier's service territory since January 1, 2011. For each circumstance also identify: (i) a description of the third party's dark fiber facilities, including the address or end points of the dark fiber; (ii) an explanation or rationale why the third party's dark fiber was utilized in lieu of Frontier's network; and (iii) any cost or pricing analysis comparing the cost of the Frontier service to the cost of the third party's dark fiber. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating dark fiber by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the dark fiber for each geographic subdivision. In addition, for each dark fiber identified in this response, list and identify the number of customers



that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides services using that dark fiber, by geographic subdivision.

**FRONTIER DATA REQUEST NO. 47.**

**Re: Network Facilities**

Identify the number and provide a list of network facilities Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington purchases, leases or otherwise acquires a right to use from third parties that is used or can be used to provide any of the Services in Frontier service territory since January 1, 2011. For each circumstance also identify: (i) a description of the third party's network facility, including the address or end points of the facility; (ii) an explanation or rationale why the third party's network facility is utilized in lieu of Frontier's network; and (iii) any cost or pricing analysis comparing the cost of the Frontier service to the cost of the third party's facility. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating the network facilities by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the network facilities for each geographic subdivision. In addition, for each network facility identified in this response, list and identify the number of customers that Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, provides services using that network facility, by geographic subdivision.

**FRONTIER DATA REQUEST NO. 48.**

**Re: Cbeyond Facility Map**

Provide a map or other document identifying the locations in Washington in which Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, has constructed or otherwise controls a facility or network that is used or can be used to provide any of the Services in Frontier's service territory in Washington. To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the



Services in Washington, maintains maps or data differentiating its network facilities by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and provided the map and requested information for each geographic subdivision.

**FRONTIER DATA REQUEST NO. 49.**

**Re: Facility Map**

Provide a map or other document identifying the locations in Washington in which Cbeyond purchases, leases, or has otherwise acquired a right to use a facility or network that is used or can be used to provide any of the Services in Frontier's service territory in Washington. To the extent Cbeyond maintains maps or data differentiating its network facilities by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and provided the map and requested information for each geographic subdivision.

**FRONTIER DATA REQUEST NO. 50.**

**Re: Market Share**

To the extent Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, maintains data differentiating the availability of the Telecommunications Services, VoIP Services, and data services it offers by geographic subdivisions, including city, county, ILEC wire center, business operating area or other political subdivision in the State of Washington, separately identify what Cbeyond, and/or any Affiliate of Cbeyond that provides any of the Services in Washington, estimates to be its market share of: (i) Telecommunications Service customers in each geographic area and (ii) data service customers in each geographic area.

**Date: March 8, 2013**

STOEL RIVES, LLP

s/Timothy J. O'Connell  
Timothy J. O'Connell  
Stoel Rives, LLP  
One Union Square  
600 University St., 36th Floor  
Seattle, WA 98101  
Phone: (206) 386-7562  
Fax: (206) 386-7500  
e-mail: [tjoconnell@stoel.com](mailto:tjoconnell@stoel.com)

Attorney for Frontier Communications  
Northwest, Inc.

**CERTIFICATE OF SERVICE**

I certify that the foregoing document is being sent to all counsel via courtesy EMAIL/PDF and the original hard copy via U. S. MAIL, postage prepaid, properly addressed, to the Counsel and Parties named below as indicated:

<p>Jennifer Cameron-Rulkowski  Assistant Attorney General  1400 S. Evergreen Park Drive S.W.  P.O. Box 40128  Olympia, WA 98504-0128  <a href="mailto:jcameron@utc.wa.gov">jcameron@utc.wa.gov</a>  <i>for Commission Staff</i></p>	<p>Simon J. ffitich  Senior Assistant Attorney General  Lisa W. Galken  Assistant Attorney General  Public Counsel Section  Office of the Attorney General  800 Fifth Avenue, Suite 2000  Seattle, WA 98104-3188  <a href="mailto:simon@atg.wa.gov">simon@atg.wa.gov</a>  <a href="mailto:lisaw4@atg.wa.gov">lisaw4@atg.wa.gov</a>  <a href="mailto:stefaniej@atg.wa.gov">stefaniej@atg.wa.gov</a>  <a href="mailto:carolw@atg.wa.gov">carolw@atg.wa.gov</a>  <i>for Public Counsel</i></p>
<p>Kevin Saville  Vice President &amp; Associate General Counsel  Frontier Communications Corporation  2378 Wilshire Blvd.  Mound. MN 55364  <a href="mailto:Kevin.Saville@FTR.com">Kevin.Saville@FTR.com</a>  <a href="mailto:Jack.phillips@ftr.com">Jack.phillips@ftr.com</a>  <a href="mailto:Carl.gipson@ftr.com">Carl.gipson@ftr.com</a>  <i>for Frontier Communications NW Inc.</i></p>	<p>Arthur A. Butler  <a href="mailto:aab@aterwynne.com">aab@aterwynne.com</a>  Ater Wynne LLP  601 Union Street, Suite 1501  Seattle, WA 98101-3981  <i>for Cbeyond Communications, LLC</i>  Stephen J. Kennedy  <a href="mailto:sjk@aterwynne.com">sjk@aterwynne.com</a></p>
<p>Douglas Denney  <a href="mailto:dkdenney@integratelecom.com">dkdenney@integratelecom.com</a>  Vice President, Costs &amp; Policy  Integra Telecom  1201 NE Lloyd Blvd., Suite 500  Portland, OR 97232  <i>for Integra Telecom of Washington, Inc.</i>  <a href="mailto:kdisaacs@integratelecom.com">kdisaacs@integratelecom.com</a>  <a href="mailto:kim.wagner@integratelecom.com">kim.wagner@integratelecom.com</a></p>	<p>Gregory T. Diamond  <a href="mailto:greg.diamond@level3.com">greg.diamond@level3.com</a>  Regulatory Counsel  Level 3 Communications, LLC  1505 5th Avenue, Suite 501  Seattle, WA 98101  <i>for Level 3 Communications, LLC</i></p>
<p>Mark P. Trincherro  <a href="mailto:marktrincherro@dwt.com">marktrincherro@dwt.com</a>  Alan J. Galloway  <a href="mailto:alangalloway@dwt.com">alangalloway@dwt.com</a>  DAVIS WRIGHT TREMAINE LLP  1300 SW Fifth Avenue, Suite 2300  Portland, Oregon 97201  <i>for tw telecom of washington llc</i></p>	<p>K.C. Halm  <a href="mailto:kchalm@dwt.com">kchalm@dwt.com</a>  DAVIS WRIGHT TREMAINE LLP  1919 Pennsylvania Avenue NW, Suite 800  Washington, DC 20006-3401  <i>for Charter Fiberlink WA-CCVII, LLC</i></p>



<p>Michael R. Moore  <u>Michael.Moore@chartercom.com</u>  Sr. Director &amp; Sr. Counsel, Reg. Affairs  Charter Communications, Inc.  12405 Powerscourt Dr.  St. Louis, MO 63131  Tel: 314-543-2414  Fax: 314-965-6640  <i>for Charter Fiberlink WA-CCVII, LLC</i></p>	<p>Stephen Melnikoff  Regulatory Law Office  <u>stephen.s.melnikoff.civ@mail.mil</u>  Kyle Smith  <u>kyle.j.smith124.civ@mail.mil</u>  General Attorney  Regulatory Law Office (JALS-RL)  U.S. Army Legal Services Agency  9275 Gunston Road  Fort Belvoir, VA 22060-5546  <i>for U.S. Dept of Defense</i></p>
<p>Lyndall Nipps  Vice President Regulatory  9665 Granite Ridge Drive, Ste 500  San Diego, CA 92123  <u>lyndall.nipps@twtelecom.com</u>  <i>for tw telecom of WA LLC</i></p>	

STOEL RIVES

s/Teresa Bitseff

Teresa Bitseff, Legal Secretary

DATED: March 8, 2013 at Seattle, WA