

**BEFORE WASHINGTON 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
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**RESPONSES OF PAC-WEST TELECOMM, INC.,  
TO COMMISSION BENCH REQUESTS  
ON BATCH HOT CUT PROCESS**

Pac-West Telecomm, Inc. (“Pac-West”) hereby provides the following responses to Commission Bench Requests directed to parties other than Qwest Corporation (“Qwest”) on batch hot cut process issues, specifically requests numbers 32-38.

**WUTC Docket No. UT-033044**  
**Pac-West Responses to Hot Cut Bench Requests**  
**November 17, 2003**

**BENCH REQUEST NO. 32:**

Describe the hot cut process currently used to transfer lines from Qwest switches to your facilities.

**RESPONSE:**

Pac-West does not use a hot cut process to transfer lines from Qwest switches to Pac-West facilities and thus lacks sufficient personal knowledge to respond to this request.

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**WUTC Docket No. UT-033044**  
**Pac-West Responses to Hot Cut Bench Requests**  
**November 17, 2003**

**BENCH REQUEST NO. 33:**

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

- (a) the average time it takes to complete the task;
- (b) the typical occurrence of the task during the process;
- (c) the labor rate for the task; and
- (d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

**RESPONSE:**

See Response to Bench Request No. 32.

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**WUTC Docket No. UT-033044**  
**Pac-West Responses to Hot Cut Bench Requests**  
**November 17, 2003**

**BENCH REQUEST NO. 34:**

Describe a batch hot cut process that you would implement to meet the FCC's requirement to establish a batch hot cut process. Please include an estimate of the maximum number of lines that should be processed in each batch.

**RESPONSE:**

Pac-West has not analyzed or taken any position on the batch hot cut process that Qwest would need to implement in Washington to meet the FCC's requirements.

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**Pac-West Responses to Hot Cut Bench Requests**  
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**BENCH REQUEST NO. 35:**

Please list each task that is part of the batch cut process described in your response to Bench Request No. 35 [*sic*], above. For each task, please provide the following information:

- (a) the average time it takes to complete the task;
- (b) the typical occurrence of the task during the process;
- (c) the labor rate for the task; and
- (d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

**RESPONSE:**

See Response to Bench Request No. 34.

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**Pac-West Responses to Hot Cut Bench Requests**  
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**BENCH REQUEST NO. 36:**

Beginning on January 1, 2003, please provide the average total cost per line that you incurred to manage and participate in Qwest's hot cut process, including, but not limited to, Qwest's non-recurring charges, for lines used to service residential and business mass-market customers in Qwest's service territory within Washington State. If the average total cost per line discussed above is different for residential and business mass-market customers, please identify the average total costs separately.

**RESPONSE:**

See Response to Bench Request No. 32.

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**BENCH REQUEST NO. 37:**

If the Commission determines that competitive carriers are not impaired without access to switching in the mass-market, please identify, by Qwest wire center in Washington State, what monthly volumes of hot cuts would be required within the first 12 months after the effective date of the decision: (a) to migrate existing UNE-P customers to UNE-L or another form of service, and (b) to connect new customers in the ordinary course of business. Please provide supporting documentation for these volume estimates.

**RESPONSE:**

Pac-West lacks personal knowledge of the extent to which other CLECs serve UNE-P customers, and Pac-West does not serve any customers in Washington using Qwest UNE-P. Accordingly, Pac-West takes no position on, and has no data to provide in response to, this request.

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**BENCH REQUEST NO. 38:**

Please describe any circumstances in which you believe Qwest has performed deficiently in providing you with hot cuts in Washington State since January 1, 2003. Please provide a complete description of all facts that you rely upon as well as documents that support your assertion.

**RESPONSE:**

See Response to Bench Request No. 32.

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Dated this 17th day of November, 2003.

As to legal issues:

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