

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of,

QWEST CORPORATION

For Competitive Classification of Basic  
Business Exchange Telecommunications  
Services

DOCKET NO. UT-030614

DECLARATION OF  
THOMAS L. WILSON

THOMAS L. WILSON, under penalty of perjury under the laws of the state of Washington, declares as follows:

1. I am over 18 years of age, a citizen of the United States, a resident of the state of Washington, and competent to be a witness.
2. I am employed by the Washington Utilities and Transportation Commission (Commission) as a Telecommunications Analyst. I have held this position since 1986.
3. I will be one of Commission Staff's witnesses in the above docket. I am also responsible for gathering and preparing for distribution the data collected from Washington CLECs in response to Order Nos. 06 and 09.
4. In order to comply with Order No. 08 to aggregate the CLEC data, rather than mask CLEC identities, I am taking the information provided by the CLECs and importing the information onto a new Excel spreadsheet. By doing this, the data will be aggregated so that the identities, trade secrets, and other highly confidential information will not be disclosed.

5. To date, Staff has received 26 out of an anticipated 206 responses from CLECs. I am building the aggregated spreadsheet as the information arrives. Creating the aggregation is extremely time consuming.
6. The CLECs were required to verify information from Qwest pursuant to Order No. 06. Qwest was required to provide that information to the CLECs by July 18, 2003. CLECs received the information from Qwest on July 23, 2003, and two CLECs, Integra and Advanced TelCom, Inc., moved for extensions of time to perform the verification. The CLECs seek to extend the time for response to July 30 or 31, 2003.
7. The Commission recently entered an order requiring CLECs to provide price information by August 4, 2003. Order No. 09, ¶ 5. Staff is required to compile copies of the responses no later than August 8, 2003.
8. I am also drafting testimony to be filed on August 6, 2003, in accordance with the current case schedule.
9. The combination of preparing an aggregation rather than a masked document, the slow rate at which CLEC data is arriving, the potential delay in gathering CLEC information to July 30 or 31, 2003, and the requirement to gather and distribute pricing information makes it highly unlikely that Staff will be able to prepare its testimony according to the current schedule.
10. Staff believes it can prepare the aggregation of CLEC information on or before August 4, 2003. Staff will prepare the CLEC pricing information on or before August 8, 2003, as required by Order No. 09.
11. Staff believes it can prepare its testimony by August 13, 2003, one week from the current schedule.
12. Staff believes it can prepare its rebuttal testimony by either August 29, 2003, or September 3, 2003.

DATED this \_\_\_\_ day of July 2003, at Olympia, Washington.

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THOMAS L. WILSON