

## **Docket No. UT- 033044**

### **Proposed Bench Requests for Triennial Review Proceedings**

1. Please identify all switches owned or controlled by [company] that are being used in [state] to provide service to customers served by facilities at or above the DS-1 level. For each switch, please state the number and percentage of customers that are being served by DS-1 and above facilities that are self-provided by [company] and are not leased from another carrier. Separately, please provide this information for customer served via DS0-level loop facilities.

2. Please state whether the information in the Local Exchange Routing Guide (LERG) for [state] is current and accurate for the switches that [company] owns, operates, controls, maintains, or from which you lease dial tone or trunking functionality/capacity. If any of the information is not accurate, please identify the inaccurate information and provide corrected information, including any additions, deletions or changes. As part of your review of the information in the LERG, please state whether the CLLI code is accurate for each switch that [company] owns, operates, controls, maintains, or from which you lease dial tone or trunking functionality/capacity. In addition, please state whether the LERG definition of the function of each switch (i.e., tandem, end office, etc.) is accurate.

3. For each switch that [company] operates, controls, maintains, or from which you lease dial tone or trunking functionality/capacity within [state], please report (in Excel spreadsheet format) whether the switch is currently providing switching for

local voice grade services, tandem switching<sup>1</sup> for voice calls, or both. In addition, for each switch, please provide traffic volumes, expressed in minutes of use, for year 2002 for local traffic and tandem traffic. If these data are not available for year 2002, please provide the information for the most recent 12-month period for which the data are available. Provide all documents that reflect, refer or relate to the information you provide in response to this request. In addition, please provide the following information for each switch:

- a. Switch type;
- b. The generic (feature package) loaded in the switch;
- c. Current number of equipped lines in the switch;
- d. The current number of equipped trunks in the switch;
- e. 2001 and 2002 line growth for the switch; and
- f. 2001 and 2002 trunk growth for the switch.

4. For each switch that [company] owns or controls within [state] that [company] is using to provide services to end-user customers served with DS-0 facilities and above, please provide the following in Excel spreadsheet format:

- a. identify the switch (by CLLI) and the LATA's served by each switch;
- b. identify the geographic area over which [company] serves such end-user customers with the switch;
- c. provide the volume of traffic (expressed in minutes of use) for the most recent 12-month period;
- d. state the manner in which the traffic carried over the DS-0 facilities is transported to the switch (i.e., transport purchased from a provider other than Qwest, transport purchased from Qwest, EELs, or transport via facilities owned by your entity); and
- e. if [company] is serving these end-user customers using DS-0 and above facilities in one LATA in [state] using a switch located in a

---

<sup>1</sup> Tandem switching is defined as switching of telephone traffic between two subtending end offices.

different LATA (including a LATA in another state), please identify the state in which the switch is located and describe the means by which you transport traffic from the second LATA to the switch.

5. Please report (in Excel spreadsheet format) the number of DS0 level lines in [state] served by loops for which [company] provides switching dial tone functionality. In responding to this request, please separate loop facilities by the categories set forth in the following table:

Sample Response Form							
State	Wire Center	Residential			Business		
		# DS0 lines served via your facilities	# DS0 lines served via Qwest leased facilities	# DS0 lines served via leased from third party	# DS0 lines served via your facilities	# DS0 lines served via Qwest leased facilities	# DS0 lines served via leased from third party

### 9 MONTH TRANSPORT

6. Please report (in Excel spreadsheet format) the speed and number of transport facilities (i.e., trunks) in [state] running between two Qwest central offices or between a Qwest central office and a CLEC central office served via network facilities owned or controlled by [company], or leased from an entity other than Qwest. For each such facility, please identify the A location, the Z location and any other premises through which the facility is routed. In addition, please break down this total number of facilities by wire center in which those trunks or EELs are located (NOTE: if data unavailable by wire center, please report the data by city).

7. Please describe whether [company] has dark fiber transport facilities available to it. For each such dark fiber facility, provide the following information: (a)

the number of strands of fiber existing in that route, (b) the A location of the fiber, the Z location of the fiber and an identification of all intermediate premises through which the fiber is routed; (c) whether that fiber is self-provisioned, obtained from Qwest, or obtained from a third party (and, if so, whom), (d) whether that fiber is owned outright, held as an indefeasible right of use (“IRU”), or has been obtained on some other basis (and, if so, what basis), (e) what electronics are actually connected or available to be connected at the originating and terminating locations of the facility and (f) whether [company] has self provisioned these electronics.

8. Please report (in Excel spreadsheet format) the number of transport trunks between any Qwest switch and a CLEC switch in [state] served via network facilities owned or controlled by [company], or leased from an entity other than Qwest. Please break down this total by wire center in which those terminations are located (NOTE: if data unavailable by wire center, please report the data by city).

Sample Response Form			
State	Wire Center	# of trunks owned by your entity	# of trunks obtained from a non-Qwest entity

9. If you currently purchase or lease interoffice transport within [state] from a company other than Qwest, please report which entity you currently obtain this service from, and also report the routes involved as well as number/type of transport facilities (e.g., copper, fiber, or radio) being purchased. Please report separately the quantity of DS0, DS1, DS3 optical carrier level (OC) and dark fiber connections you currently are purchasing, leasing or otherwise are being provided from non-Qwest entities.

Sample Response Form				
State	Entity from which transport is obtained	Originating and terminating points of each transport facility leased	Type of transport leased (DS0,DS1,DS3,OC,dark fiber))	Quantity of transport connections leased, by type (as of 3/03)

## 9 MONTH SWITCHING

10. For each LATA and wire center in which you provide switched local services via DS0-level loops, please identify:

- a. What number of the in service lines are:
  - i. UNE-P Business;
  - ii. UNE-P Residence;
  - iii. UNE-L Business;
  - iv. UNE-L Residence;
  - v. Business lines provided using the [company]'s own loop facilities and another party's dial tone (switching);
  - vi. Business lines provided using [company]'s own loop facilities and own dial tone;
  - vii. Business lines using a third party's loop facilities and [company]'s own dial tone;
  - viii. Residential lines provided using the company's own loop facilities and another party's dial tone;
  - ix. Residential lines provided using the [company]'s own loop facilities and own dial tone;
  - x. Residential lines using a third party's loop facilities and the [company]'s own dial tone;
  - xi. For any residential and business lines served in any manner not listed above, in what manner are those lines served?

11. Please list all areas in [state] in which [company] has engaged in any form of advertising or marketing of local exchange services within the past 12 months. Please produce all documents that reflect or relate to such advertisements and marketing efforts, including copies of all advertisements and documents describing marketing campaigns.

12. Please state whether [company] has purchased switching (wholesale or retail) in [state] from any entity other than Qwest. If [company] has purchased switching from any entity other than Qwest, please identify all such entities and identify the locations of their switches that are providing the switching and the locations of the customers served by [company] via those switches.

13. For each switch that [company] owns operates, controls, maintains, or from which you lease dial tone or trunking functionality/capacity within [state], please state (in Excel spreadsheet format) if the switch is providing originating voice grade services for residential end-user customers and/or small business customers (defined for this question as businesses with four DS-0 lines or fewer). If so, please:

- a. Identify the switch (by CLLI) and the LATA(s) served by each switch (the LATA in which the switch providing the originating dial tone is physically located);
- b. Identify the geographic area over which [company] serves residential end-user customers and/or small business customers with the switch;
- c. State the number of business and residential retail customers served by the switch;
- d. Provide the volume of such traffic (expressed in minutes of use) by switch for the most recent 12-month period;
- e. Identify the rate centers you are serving for originating traffic;

- f. State the manner by which such traffic is transported to the switch (i.e., transport purchased from a provider other than Qwest , transport purchased from Qwest, EELs or transport via facilities owned by your entity); and
- g. If [company] is serving customers (as defined above) in one LATA in [state] using a switch located in another LATA (including a LATA in another state), please identify the LATA and state in which the switch is located and describe the means by which you transport traffic from the second LATA to the switch.

14. For each Qwest wire center in [state] in which [company] provides retail switched local exchange service, please report the number of switched DS-0 level lines in service per customer location that [company] serves. Please provide this information in the following format:

WIRE CENTER		
<u>Quantity of DSO Lines</u>	<u>Customer Location</u>	
	<u>Residence</u>	<u>Business</u>
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		

For example, if you currently serve 100 single line residential customers and 200 2-line business customers in the wire center, show “100” in the residential column on the Quantity line of “1”, and “200” in the business column on the Quantity line of “2.”

15. Please state whether [company] is using extended enhanced links ("EELs") in [state]. If so, identify each EEL, and for each such facility, explain or state (1) the services being provided over the EEL, (2) the number of customers served by the EEL, (3) whether the facility is being used in lieu of collocation, (4) the number of loops connected to the EEL, a descriptions of the type of loop facilities so connected, and the final demarcation point of each loop, and (5) whether the facility is being used as a functional private line.

### **ECONOMIC ISSUES**

16. Please provide the average total revenue per line that [company] received from its residential customers within [state] in 2001 and 2002. The average revenue per line should include revenues associated with the basic retail price charged to residential customers, vertical features, universal service payments, interstate access charges, intrastate access charges, subscriber line charges, toll, long distance, local number portability, data, service to Internet service providers, , and line revenues derived from any other sources. Please provide both the total average revenue per line and a breakdown of the amount of revenue for each category of revenue that comprises the total. In addition, please list intraLATA and interLATA revenues separately. Please produce all documents that reflect, refer or relate to the information provided in your response to this request.



17. Please provide the average total revenue per line that [company] received from its business customers within [state] in 2001 and 2002. The average revenue per line should include revenues associated with the basic retail price charged to business customers, vertical features, universal service payments, interstate access charges, intrastate access charges, subscriber line charges, toll, long distance, local number portability, data, and line revenues derived from any other sources. Please provide both the total average revenue per line and a breakdown of the amount of revenue for each category of revenue that comprises the total. In addition, please list intraLATA and interLATA revenues separately. If revenues differ depending on the type of business customer (small vs. large), please provide the total revenues and the breakdown of revenues by type of business customer. Please provide the information by POTS, DS0, DS1, DS3, OC-3, OC-12, OC-48, and any other relevant categories. Please produce all documents that reflect, refer or relate to the information provided in your response to this request.

18. Please provide the average total cost per line that [company] incurred in 2001 and 2002 for lines used to serve residential customers within [state]. These costs should include costs associated with switching; loops; collocation; transport; hot cuts; OSS; signaling; customer acquisitions; backhauling traffic to [company's] switches; maintenance, operations, and other administrative activities; and capital costs. If available, please provide a breakdown of this information for the following categories: (1) service provided by UNE-P, (2) service provided by UNE-L, and (3) service provided using [company]'s own facilities. In addition, please provide any available breakdowns of each cost component that is part of the average total cost per line, identifying the type

and amount of each cost. Please produce all documents that reflect, refer or relate to the information provided in your response to this request.

19. Please provide the average total cost per line that [company] incurred in 2001 and 2002 for lines used to serve business customers within [state]. These costs should include costs associated with switching; loops; collocation; transport; hot cuts; OSS; signaling; customer acquisitions; backhauling traffic to [company's] switches; maintenance, operations, and other administrative activities; and capital costs. In addition to a total average cost, please provide separate averages for service provided through UNE-P, UNE-L, and with [company]'s own facilities. Please provide a breakdown of each cost component that is part of the average total cost per line, identifying the type and amount of each cost. If costs differ depending on the type of business customer (small vs. large), please provide the total cost and the breakdown of costs by type of business customer. Please identify how your company defines "small" and "large" business customers. Please produce all documents that reflect, refer or relate to the information provided in your response to this request.

20. Does [company] incur any customer acquisition costs (excluding any charges paid to ILECs) to set up a new customer account and to establish service? If so, please identify all such costs and provide the amount of all such costs, by individual cost categories, for 2001 and 2002.

21. Please list the total collocation costs that [company] has incurred in [state] in each of the past three years and also provide a breakdown for each year of the different categories of collocation costs that [company] has incurred. In addition, please produce

all documents and data that reflect, refer or relate to the collocation costs that [company] has incurred in [state] in the past three years.

22. Please identify the monthly churn rate [company] has experienced for local exchange customers in each month in which it has provided local exchange service in the [state] market. In answering this request, you should calculate the churn rate based upon the number of lines lost each year divided by the average number of lines in service that year. In calculating churn, do not include customers who move but stay with the company. Please produce all documents that refer or relate to the information you provide in response to this request.

23. If [company] offers intrastate long distance service to end users in [state], please report total intrastate long distance minutes of use and revenue for full years 2001 and 2002.

Sample Response Form				
State	2001 intrastate long distance minutes of use	2001 intrastate long distance revenue	2002 intrastate long distance minutes of use	2002 intrastate long distance revenue

**OPERATIONAL ISSUES**

24. If the state commission determines that competitive carriers are not impaired without access to switching in the mass market, provide projections of the number of UNE-L orders and/or conversions you would anticipate over the first 12 months after the effective date of the decision.