

DATA REQUEST RESPONSE

Docket No. UT-013097, Part B

Exhibit BJB-4

June 11, 2002

Case Description: Tel West Communications, LLC, Petition for Enforcement of its Interconnection Agreement with Qwest

Docket No.: UT-013097

State: Washington

Requesting Party: Qwest Corporation

Responding Party: TEL WEST Communications, LLC

Qwest-097: Does Tel West contend that Qwest is in violation of the parties' interconnection agreement because Qwest's IMA GUI is, in Tel West's opinion, inferior to IMA EDI?

Response: Tel West does not use IMA-EDI and therefore make no contentions regarding IMA-EDI.

Respondent: Jeff Swickard

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Qwest-116: Admit that the Tel West order processing employees do not conduct pre-order customer address validations for each new customer line order taken for Washington accounts. If you deny this, please fully explain the basis for your denial and please produce all documents demonstrating that such employees are instructed to do such validation.

Response: Tel West denies this. Preorder validation is required for several order types. There are no documents in Tel West's possession demonstrating that employees are instructed to do validation.

Respondent: Jeff Swickard

Supplemental Request (May 3, 2002)

Qwest-116: Please clarify what Tel West means by "Preorder validation is required for several order types." Please describe all facts and produce all documents that support Tel West's explanation. Be sure your explanation includes which order types Tel West is referring to in its response.

Supplemental Response (May 10, 2002)

IMA-GUI requires preorder validation for new connects, disconnects, address changes, and feature changes. So, Tel West order processing employees must conduct preorder address validations to perform these orders. If they do not do so, IMA-GUI will error out the order prior to submission. Tel West has no documents relating to this response. Of course, IMA-GUI is Qwest's own system, so Qwest should already be aware of the types of orders for which preorder validation is required.

Respondent: Chris Sturgul

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Responding Party: TEL WEST Communications, LLC

Qwest-145: Did employees or representatives of Tel West interview or meet with KPMG
Consulting in connection with KPMG's test of Qwest's OSS?

Response: Yes.

Respondent: Jeff Swickard

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Responding Party: TEL WEST Communications, LLC

Qwest-146: If your answer to the preceding data request is in the affirmative:

(a) Identify the date(s) of each interview with KPMG.

Response: This interview occurred on January 31, 2002.

(b) Identify each person that interviewed with KPMG on behalf of Tel West.

Response: Chris Sturgul and Matt Myers met with KPMG.

(c) Identify and describe in full the subject matters discussed with KPMG.

Response: The parties discussed the functions of IMA-GUI. KPMG representatives asked Mr. Sturgul to perform a new connection, a conversion, a change order, and a disconnection. During the interview, Mr. Sturgul discussed the problems with IMA-GUI.

(d) Identify and produce all documents produced to KPMG or by KPMG before, during or subsequent to the interview(s).

Response: Tel West did not retain documents related to the KPMG interview.

(e) To your knowledge, did KPMG attempt to validate the concerns raised by Tel West during the interview(s) or meetings?

Response: Tel West objects to this request because it is vague. It is unclear what Qwest means by the phrase "validate the concerns" of Tel West.

(f) If your answer to subpart (e) is in the affirmative, what were KPMG's conclusions?

Response: N/A.

(g) Produce all documents supporting or relevant to your response to subpart (f).

Response: There are no responsive documents.

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Qwest-146(e)-(g): Tel West refused to answer these subparts because they claimed them to be vague. As noted above, Tel West should have indicated its concern earlier so that Qwest could have understood what Tel West finds vague about the subparts and clarified the request. That said, Qwest asks that Tel West supplement its response. To clarify, Qwest is interested in: knowing whether KPMG, to Tel West's knowledge, followed up in any way to investigate, test, analyze or verify the allegations Tel West made during the interview; knowing what it concluded; and receiving copies of any documents relevant to the first two inquiries.

Supplemental Response (May 10, 2002)

To the best of Tel West's knowledge, KPMG never followed up in any way with the results of their investigation or provided Tel West with any documentation. If KPMG did provide documentation, Tel West no longer has a copy of it.

Respondent: Chris Sturgul