

1 **Q. JOINT CLECS ALSO QUESTION QWEST’S CLAIM THAT CLEC**
2 **MARKET SHARE HAS GROWN BY 32%, SUGGESTING THAT THE**
3 **INCREASE IN MARKET SHARE CANNOT BE DETERMINED**
4 **WITHOUT USING QWEST’S BUSINESS LINE QUANTITIES FOR THE**
5 **TWO TIME PERIODS. DO YOU AGREE?**

6 A. Yes, I do. In its Petition, Qwest inadvertently referred to the percentage growth in
7 wholesale service quantities, or 32%, as the growth in CLEC market share. I have
8 corrected this reference in my testimony and clarified the calculation in footnote
9 15. The actual growth in *minimum CLEC market share*, as that term has been
10 used previously in my testimony, is 36%.¹⁹ Obviously, the 36% growth rate is
11 more than the 32% originally referenced, providing substantial support for
12 Qwest’s contention that there is significant growth in competitive market share in
13 the relevant market.

14 **Q. ARE YOU AWARE OF ANY OTHER ACTIVITY IN THIS DOCKET**
15 **REGARDING THE ASSEMBLY OF COMPETITIVE DATA FOR THE**
16 **SERVICES FOR WHICH QWEST SEEKS COMPETITIVE**
17 **CLASSIFICATION?**

18 A. Yes. On June 12, 2003, Commission Staff filed a Motion requesting the
19 Commission to order CLECs to produce information regarding the services they
20 offer that compete with the services for which Qwest seeks competitive
21 classification. Qwest supports Staff’s Motion on the basis that the additional
22 evidence sought by Staff will only bolster Qwest’s case.

¹⁹ The actual calculation of the 36% growth in CLEC market-share is based on the following data: Qwest basic business exchange access lines: 2001 – 550,329, 2002 – 520,635; CLEC basic business access lines provisioned via UNE-P, unbundled loops, and resale; 2001 – 78,869 ~~78,876~~, 2002 – 104,019.