

DATA REQUEST RESPONSE

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-106: For IMA GUI release 6.0 (released December 11, 2000):

- (a) Admit that no Tel West employees or representatives attended Qwest’s formal training on the version.

Response: Tel West objects because this question is not likely to lead to the discovery of admissible evidence. Data requests Qwest-106 to Qwest-113 all presuppose Qwest’s groundless expectation that Tel West must send its employees to Denver every few months to be retrained on Qwest’s constant changes to IMA-GUI. In contrast, Qwest’s internal OSS does not have to be continuously revised and therefore does not require constant retraining.

Without waiving this objection, Tel West admits this.

- (b) With regard to subpart (a), if you deny this, identify the location of the training sessions attended by Tel West employees and the persons who attended the training sessions on behalf of Tel West.

Response: N/A.

- (c) With regard to subpart (a), if you admit this, please fully explain how Tel West internally trained its customer representatives CRs responsible for processing orders over Qwest’s IMA GUI on the release.

Response: See the response to Qwest 106(e).

- (d) Regardless of how you answered subpart (a), fully explain how Tel West’s management kept advised on updates and training issues regarding the release.

Response: Tel West management keeps advised by reviewing the updates and notices on Qwest’s web site, www.qwest.com/wholesale/notices.

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- (e) Regardless how you answered subpart (a), fully explain how Tel West's CRs who process orders over Qwest's IMA GUI kept advised on updates and training issues regarding the release.

Response: Tel West trains its employees using documents available on Qwest's website: <http://www.qwest.com/wholesale/IMA/GUI/IMAUSER.html>. Tel West trains its CRs to enter individual orders using Qwest's I-CHARTS, which is also available at Qwest's website. I-CHARTS shows what types of field must be populated for particular order types.

Respondent: Jeff Swickard

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Responding Party: TEL WEST Communications, LLC

Qwest-107: For IMA GUI release 6.1 (released February 26, 2001):

- (a) Admit that no Tel West employees or representatives attended Qwest's formal training on the version.

Response: Tel West objects because this question is not likely to lead to the discovery of admissible evidence. Data requests Qwest-106 to Qwest-113 all presuppose Qwest's groundless expectation that Tel West must send its employees to Denver every few months to be retrained on Qwest's constant changes to IMA-GUI. In contrast, Qwest's internal OSS does not have to be continuously revised and therefore does not require constant retraining.

Without waiving this objection, Tel West admits this.

- (b) With regard to subpart (a), if you deny this, identify the location of the training sessions attended by Tel West employees and the persons who attended the training sessions on behalf of Tel West.

Response: N/A.

- (c) With regard to subpart (a), if you admit this, please fully explain how Tel West internally trained its customer representatives CRs responsible for processing orders over Qwest's IMA GUI on the release.

Response: See response to Qwest 107(e).

- (d) Regardless of how you answered subpart (a), fully explain how Tel West's management kept advised on updates and training issues regarding the release.

Response: Tel West management keeps advised by reviewing the updates and notices on Qwest's web site, www.qwest.com/wholesale/notices.

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- (e) Regardless how you answered subpart (a), fully explain how Tel West's CRs who process orders over Qwest's IMA GUI kept advised on updates and training issues regarding the release.

Response: Tel West trains its employees using documents available on Qwest's website: <http://www.qwest.com/wholesale/IMA/GUI/IMAUSER.html>. Tel West trains its CRs to enter individual orders using Qwest's I-CHARTS, which is also available at Qwest's website. I-CHARTS shows what types of field must be populated for particular order types.

Respondent: Jeff Swickard

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Requesting Party: Qwest Corporation
Responding Party: TEL WEST Communications, LLC

Qwest-108: For IMA GUI release 7.0 (released April 23, 2001):

- (a) Admit that no Tel West employees or representatives attended Qwest's formal training on the version.

Response: Tel West objects because this question is not likely to lead to the discovery of admissible evidence. Data requests Qwest-106 to Qwest-113 all presuppose Qwest's groundless expectation that Tel West must send its employees to Denver every few months to be retrained on Qwest's constant changes to IMA-GUI. In contrast, Qwest's internal OSS does not have to be continuously revised and therefore does not require constant retraining.

Without waiving this objection, Tel West admits this.

- (b) With regard to subpart (a), if you deny this, identify the location of the training sessions attended by Tel West employees and the persons who attended the training sessions on behalf of Tel West.

Response: N/A.

- (c) With regard to subpart (a), if you admit this, please fully explain how Tel West internally trained its customer representatives CRs responsible for processing orders over Qwest's IMA GUI on the release.

Response: See response to Qwest 108(e).

- (d) Regardless of how you answered subpart (a), fully explain how Tel West's management kept advised on updates and training issues regarding the release.

Response: Tel West management keeps advised by reviewing the updates and notices on Qwest's web site, www.qwest.com/wholesale/notices.

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Responding Party: TEL WEST Communications, LLC

- (e) Regardless how you answered subpart (a), fully explain how Tel West's CRs who process orders over Qwest's IMA-GUI kept advised on updates and training issues regarding the release.

Response: Tel West trains its employees using documents available on Qwest's website: <http://www.qwest.com/wholesale/IMA/GUI/IMAUSER.html>. Tel West trains its CRs to enter individual orders using Qwest's I-CHARTS, which is also available at Qwest's website. I-CHARTS shows what types of field must be populated for particular order types.

Respondent: Jeff Swickard

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Docket No.: UT-013097
State: Washington
Requesting Party: Qwest Corporation
Responding Party: TEL WEST Communications, LLC

Qwest-109: For IMA GUI release 7.1 (released June 18, 2001):

- (a) Admit that no Tel West employees or representatives attended Qwest's formal training on the version.

Response: Tel West objects because this question is not likely to lead to the discovery of admissible evidence. Data requests Qwest-106 to Qwest-113 all presuppose Qwest's groundless expectation that Tel West must send its employees to Denver every few months to be retrained on Qwest's constant changes to IMA-GUI. In contrast, Qwest's internal OSS does not have to be continuously revised and therefore does not require constant retraining.

Without waiving this objection, Tel West admits this.

- (b) With regard to subpart (a), if you deny this, identify the location of the training sessions attended by Tel West employees and the persons who attended the training sessions on behalf of Tel West.

Response: N/A.

- (c) With regard to subpart (a), if you admit this, please fully explain how Tel West internally trained its customer representatives CRs responsible for processing orders over Qwest's IMA GUI on the release.

Response: See response to Qwest 109(e).

- (d) Regardless of how you answered subpart (a), fully explain how Tel West's management kept advised on updates and training issues regarding the release.

Response: Tel West management keeps advised by reviewing the updates and notices on Qwest's web site, www.qwest.com/wholesale/notices.

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Responding Party: TEL WEST Communications, LLC

- (e) Regardless how you answered subpart (a), fully explain how Tel West's CRs who process orders over Qwest's IMA GUI kept advised on updates and training issues regarding the release.

Response: Tel West trains its employees using documents available on Qwest's website: <http://www.qwest.com/wholesale/IMA/GUI/IMAUSER.html>. Tel West trains its CRs to enter individual orders using Qwest's I-CHARTS, which is also available at Qwest's website. I-CHARTS shows what types of field must be populated for particular order types.

Respondent: Jeff Swickard

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Docket No.: UT-013097
State: Washington
Requesting Party: Qwest Corporation
Responding Party: TEL WEST Communications, LLC

Qwest-110: For IMA GUI release 8.0 (released August 20, 2001):

- (a) Admit that no Tel West employees or representatives attended Qwest's formal training on the version.

Response: Tel West objects because this question is not likely to lead to the discovery of admissible evidence. Data requests Qwest-106 to Qwest-113 all presuppose Qwest's groundless expectation that Tel West must send its employees to Denver every few months to be retrained on Qwest's constant changes to IMA-GUI. In contrast, Qwest's internal OSS does not have to be continuously revised and therefore does not require constant retraining.

Without waiving this objection, Tel West admits this.

- (b) With regard to subpart (a), if you deny this, identify the location of the training sessions attended by Tel West employees and the persons who attended the training sessions on behalf of Tel West.

Response: N/A.

- (c) With regard to subpart (a), if you admit this, please fully explain how Tel West internally trained its customer representatives CRs responsible for processing orders over Qwest's IMA GUI on the release.

Response: See response to Qwest 110(e).

- (d) Regardless of how you answered subpart (a), fully explain how Tel West's management kept advised on updates and training issues regarding the release.

Response: Tel West management keeps advised by reviewing the updates and notices on Qwest's web site, www.qwest.com/wholesale/notices.

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Responding Party: TEL WEST Communications, LLC

- (e) Regardless how you answered subpart (a), fully explain how Tel West's CRs who process orders over Qwest's IMA GUI kept advised on updates and training issues regarding the release.

Response: Tel West trains its employees using documents available on Qwest's website: <http://www.qwest.com/wholesale/IMA/GUI/IMAUSER.html>. Tel West trains its CRs to enter individual orders using Qwest's I-CHARTS, which is also available at Qwest's website. I-CHARTS shows what types of field must be populated for particular order types.

Respondent: Jeff Swickard

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Docket No.: UT-013097
State: Washington
Requesting Party: Qwest Corporation
Responding Party: TEL WEST Communications, LLC

Qwest-111: For IMA GUI release 8.1 (released November 19, 2001):

- (a) Admit that no Tel West employees or representatives attended Qwest's formal training on the version.

Response: Tel West objects because this question is not likely to lead to the discovery of admissible evidence. Data requests Qwest-106 to Qwest-113 all presuppose Qwest's groundless expectation that Tel West must send its employees to Denver every few months to be retrained on Qwest's constant changes to IMA-GUI. In contrast, Qwest's internal OSS does not have to be continuously revised and therefore does not require constant retraining.

Without waiving this objection, Tel West admits this.

- (b) With regard to subpart (a), if you deny this, identify the location of the training sessions attended by Tel West employees and the persons who attended the training sessions on behalf of Tel West.

Response: N/A.

- (c) With regard to subpart (a), if you admit this, please fully explain how Tel West internally trained its customer representatives CRs responsible for processing orders over Qwest's IMA GUI on the release.

Response: See response to Qwest 111(e).

- (d) Regardless of how you answered subpart (a), fully explain how Tel West's management kept advised on updates and training issues regarding the release.

Response: Tel West management keeps advised by reviewing the updates and notices on Qwest's web site, www.qwest.com/wholesale/notices.

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Responding Party: TEL WEST Communications, LLC

- (e) Regardless how you answered subpart (a), fully explain how Tel West's CRs who process orders over Qwest's IMA GUI kept advised on updates and training issues regarding the release.

Response: Tel West trains its employees using documents available on Qwest's website: <http://www.qwest.com/wholesale/IMA/GUI/IMAUSER.html>. Tel West trains its CRs to enter individual orders using Qwest's I-CHARTS, which is also available at Qwest's website. I-CHARTS shows what types of field must be populated for particular order types.

Respondent: Jeff Swickard

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Responding Party: TEL WEST Communications, LLC

Qwest-112: For IMA GUI release 9.0 (released February 25, 2002):

- (a) Identify who attended the training sessions on behalf of Tel West on February 14, 2002 in Seattle, Washington.

Response: No one attended.

- (b) Please fully explain how Tel West internally trained its customer representatives CRs responsible for processing orders over Qwest's IMA GUI on the release.

Response: See response to Qwest 112(e).

- (c) Fully explain how Tel West's management kept advised on updates and training issues regarding the release.

Response: Tel West's management monitored Qwest's web site: www.qwest.com/wholesale/notices.

- (d) Fully explain how Tel West's CRs who process orders over Qwest's IMA GUI kept advised on updates and training issues regarding the release.

Response: Tel West trains its employees using documents available on Qwest's website: <http://www.qwest.com/wholesale/IMA/GUI/IMAUSER.html>. Tel West trains its CRs to enter individual orders using Qwest's I-CHARTS, which is also available at Qwest's website. I-CHARTS shows what types of field must be populated for particular order types.

Respondent: Jeff Swickard

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Requesting Party: Qwest Corporation
Responding Party: TEL WEST Communications, LLC

Qwest-113: For IMA GUI release 9.1 (released March 25, 2002):

(a) Admit that no Tel West employees or representatives attended Qwest's formal training on the version.

Response: Deny.

(b) With regard to subpart (a), if you deny this, identify the location of the training sessions attended by Tel West employees and the persons who attended the training sessions on behalf of Tel West.

Response: Chris Sturgul attended this training session in the Seattle Qwest building.

(d) With regard to subpart (a), if you admit this, please fully explain how Tel West internally trained its customer representatives CRs responsible for processing orders over Qwest's IMA GUI on the release.

Response: N/A.

(e) Regardless of how you answered subpart (a), fully explain how Tel West's management kept advised on updates and training issues regarding the release.

Response: Tel West's management monitored Qwest's web site: www.qwest.com/wholesale/notices.

(f) Regardless how you answered subpart (a), fully explain how Tel West's CRs who process orders over Qwest's IMA GUI kept advised on updates and training issues regarding the release.

Response: Tel West trains its employees using documents available on Qwest's website: <http://www.qwest.com/wholesale/IMA/GUI/IMAUSER.html>. Tel West trains its CRs to enter individual orders using Qwest's I-CHARTS, which is also available at Qwest's website. I-CHARTS shows what types of field must be populated for particular order types.

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Respondent: Jeff Swickard

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Docket No.: UT-013097
State: Washington
Requesting Party: Qwest Communications
Responding Party: TEL WEST Communications, LLC

Qwest-114: Identify each current Tel West employee who processes service orders over Qwest's IMA GUI. For each person, identify:

- (a) His or her name.
- (b) His or her dates of employment with Tel West.
- (c) The time period during which the employee has processed Tel West orders for customers in Qwest's territory.
- (d) His or her telecommunications background and experience.
- (e) Each formal Qwest training session he or she has attended (identify by date, location and subject matter), to the extent not identified above.
- (f) Whether he or she receives Qwest's training notifications offered through Qwest's public web site.
- (g) Which web-based wholesale tutorials (available at <http://Qwestwww.qwest.com/wholesale/training/coursecatalog.html>) he or she has completed. Also identify when he or she completed each tutorial.
- (h) What other methods of on-going training on Qwest's systems he or she receives. Identify how often each additional training method is used, when it was first implemented by Tel West and whether it has been continuously used since first implemented.

Response: Tel West objects because this question is unduly burdensome and not likely to lead to the discovery of admissible evidence. This question seeks information far beyond the limited generic questions Tel West asked about the experience of Qwest's order processors.

Without waiving this objection, Tel West has attached a document with non-objectionable information.

Respondent: Jeff Swickard

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Supplemental Request (May 3, 2002)

Qwest-114(e): Please specify the dates Mr. Sturgul attended the training sessions listed in the attachment to Tel West's response to this data request. Please make sure the date provided includes the month, date and year.

Supplemental Response (May 10, 2002)

Qwest-114(e):

Below are the locations and dates known to Tel West for training sessions that Mr. Sturgul attended and that are described in the attachment to the original data request response:

Complex Listings in IMA – Portland, 04/23-24/2002
ASR LIS Trunking – Denver, 06/28/2001
ASR Special Access – Denver, 06/21/2001
ASR Switched Access- Denver, 2001
UNE-P POTS – Denver, 06/29/2002
IMA GUI updates (pertinent updates only)-Seattle 07/31/2001, 02/14/2002
IMA Hands-on – Qwest Seattle Headquarters, Spring 1999; Tel West's offices, Summer 1999
Centrex Systems (web-based) - 3/2002
Centrex Resale – Minneapolis, 03/18-19/2002

Respondent: Chris Sturgul

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Qwest-114: Identify each current Tel West employee who processes service orders over Qwest's IMA GUI. For each person, identify:

- (a) His or her name.
- (b) His or her dates of employment with Tel West.
- (c) The time period during which the employee has processed Tel West orders for customers in Qwest's territory.
- (d) His or her telecommunications background and experience.
- (e) Each formal Qwest training session he or she has attended (identify by date, location and subject matter), to the extent not identified above.
- (f) Whether he or she receives Qwest's training notifications offered through Qwest's public web site.
- (g) Which web-based wholesale tutorials (available at <http://Qwestwww.qwest.com/wholesale/training/coursecatalog.html>) he or she has completed. Also identify when he or she completed each tutorial.
- (h) What other methods of on-going training on Qwest's systems he or she receives. Identify how often each additional training method is used, when it was first implemented by Tel West and whether it has been continuously used since first implemented.

Response: Tel West objects because this question is unduly burdensome and not likely to lead to the discovery of admissible evidence. This question seeks information far beyond the limited generic questions Tel West asked about the experience of Qwest's order processors.

Without waiving this objection, Tel West has attached a document with non-objectionable information.

Respondent: Jeff Swickard