

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

|                                   |                                 |
|-----------------------------------|---------------------------------|
| In the Matter of the Petition of  | )                               |
|                                   | ) DOCKET NO. UT-030614          |
| QWEST CORPORATION                 | )                               |
|                                   | ) <b>AT&amp;T'S RESPONSE TO</b> |
|                                   | ) <b>STAFF'S MOTION FOR</b>     |
| For Competitive Classification of | ) <b>CLARIFICATION</b>          |
| Basic Business Exchange           | )                               |
| Telecommunications Services.      | )                               |
|                                   | )                               |

Pursuant to Administrative Law Judge (“ALJ”) Mace’s Notice of Opportunity to Respond to Staff Motion for Clarification, AT&T Communications of the Pacific Northwest, Inc.; AT&T Local Services on behalf of TCG Seattle; and TCG Oregon (collectively “AT&T”) hereby respond to Staff’s Motion for Clarification.

1. AT&T disagrees with Staff’s position that CLEC aggregated data should be designated as non-confidential. Rather, the CLEC aggregated data should be designated as confidential and must only be distributed to those parties who have signed the protective order in this docket.

2. Neither AT&T nor any of the other CLEC providing highly sensitive data have any guarantees that the data will be aggregated adequately enough to truly protect the CLEC identities or individual. Therefore, it is AT&T’s position that the Commission should approach the distribution of such data with caution and that CLEC aggregated data should be designated as confidential.

Respectfully submitted this 31<sup>st</sup> day of July 2003.

**AT&T COMMUNICATIONS OF THE  
PACIFIC NORTHWEST, INC. AND  
AT&T LOCAL SERVICES ON  
BEHALF OF TCG SEATTLE AND  
TCG OREGON**

By: \_\_\_\_\_

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