

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T COMMUNICATIONS OF
THE PACIFIC NORTHWEST, INC.,
TCG SEATTLE, AND TCG OREGON;
AND TIME WARNER TELECOM OF
WASHINGTON, LLC,

Complainants,

v.

QWEST CORPORATION,

Respondent.

Docket No. UT-051682
AFFIDAVIT OF MARK S. REYNOLDS

I, MARK S. REYNOLDS, being first duly sworn, depose and say as follows.

1. I have worked for defendant Qwest Corporation and its predecessor companies (“Qwest”) for more than twenty-six years in a variety of areas including Marketing, Finance, Strategic Planning and Public Policy. I am currently the Assistant Vice President of Regulatory Affairs in the Public Policy department, a position that I have held since 1997. I am responsible for the overall regulatory operations of Qwest in Washington and act as the primary contact with the Washington Utilities and Transportation Commission (“WUTC”). I am over the age of eighteen and have personal knowledge of the facts contained in this affidavit. If called to do so, I could and would competently testify as set forth in this affidavit.

1 2. As a part of my job responsibilities, I oversee the process of filing retail tariffs
2 with the WUTC. As required by Washington state statute and WUTC rules, Qwest has
3 numerous tariffs on file with the WUTC which cover many of Qwest's regulated retail service
4 offerings. The following internet link provides access to all of Qwest's currently effective
5 Washington tariffs: http://tariffs.qwest.com:8000/Q_Tariffs/WA/index.htm.

7 3. As a part of my previous job responsibilities, I also have a working knowledge of
8 the process for filing tariffs with the FCC. Between 2000 and 2002 (the years at issue in this
9 case), Qwest had the tariff WN U-44 on file with the WUTC for intrastate access services and the
10 tariff FCC QC No. 1 on file with the Federal Communications Commission ("FCC") for
11 interstate switched access service. Those tariffs were approved by the WUTC and the FCC,
12 respectively. Those tariffs are voluminous, but can be located at the following URLs:

14 http://tariffs.qwest.com:8000/idc/groups/public/documents/tariff/htmltoc_or_a_t.htm for

15 intrastate switched access and

16 http://tariffs.qwest.com:8000/idc/groups/public/documents/tariff/htmltoc_fcc1.htm for

17 interstate switched access. Both WN U-44 and FCC QC No. 1, Section 6.8 - Rates and Charges,

18 provide the details of applicable charges under these tariffs. Although the websites reference

20 the current tariffs, they are substantially similar to the tariffs that were in effect between 2000 and
21 2002.

22 4. It is from WN U-44 and FCC QC No. 1 that AT&T orders intrastate and interstate
23 access services from Qwest. The rates listed in these tariffs that were effective during the years
24 at issue in this case, are the rates that AT&T paid for intrastate and interstate access services.
25
26

