

Washington
UT-033044
WUTC 2-Bench Requests-063

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 063

Please identify any and all purposes for which Qwest uses each of the following differentiations for operational, economic, or marketing purposes: (1) LATA, (2) wire center, (3) MSA, (4) deaveraged rate zone, (5) entire state, (6) entire service area, and (7) any other level of differentiation Qwest uses (please specify).

RESPONSE:

All of the differentiations listed above were created for various legal, regulatory, functional, or other purposes. The extent to which Qwest uses each of these varies in accordance with the purposes for which they were originally created and the extent to which these distinctions are meaningful or necessary for various aspects of the business. In this response, Qwest has attempted to set forth the primary uses of each of the differentiations listed, but does not intend this list to be exclusive or necessarily exhaustive, as there may be other uses of these differentiation, and other differentiations, that are used in some areas of the business but which could not be identified in time for inclusion in this response.

(1) LATA: The Local Access and Transport Area (LATA) differentiation was created at divestiture to define local calling areas within which it was permissible for the Bell Operating Company (BOC) to carry end to end traffic. Traffic between LATAs could only be carried by interexchange carriers such as AT&T.

LATA is defined in 47 U.S.C. 153(25) as "a contiguous geographic area - (A) established before the date of enactment of the Telecommunications Act of 1996 by a Bell operating company such that no exchange area includes points within more than 1 metropolitan statistical area, consolidated metropolitan statistical area, or State, except as expressly permitted under the AT&T Consent Decree; or (B) established or modified by a Bell operating company after such date of enactment and approved by the Commission."

Prior to being granted relief under Section 271 of the Act, no Qwest entity could provide interLATA service in U S WEST's 14-state region. Because Qwest was constrained with regard to offering interLATA service, the LATA distinction was and is used within Qwest for operational, economic, and marketing purposes in order to comply with the law. The interLATA restriction continues today for Qwest Corporation (QC), but is somewhat mitigated by QC gaining 271 approval. 271 approval allows QC to jointly market interLATA services provided by Qwest Long Distance Corporation ("QLDC") and Communications Corporation (QCC), Qwest's 272 affiliates.

(2) Wire Center: From an operational perspective the wire center represents the basic engineering construct of Qwest's network. The wire center is the hub of Qwest's local distribution network where switching equipment, interoffice transport facilities and loop facilities are integrated to provide various types of services to customers. Because Qwest inventories its facilities by wire center (i.e., loops, switched, and transport terminations), wire centers typically form the basis of various types of operations, economic and even marketing reports. Additionally, from an operational perspective, Qwest assigns network personnel, such as design engineers and central office technicians, on a wire-center basis. Also, because of the available facilities inventories, cost studies often utilize such information, even though the results can be aggregated to either an MSA or state level basis. Other studies that rely on the detailed inventories at the wire center level are competitive analyses, marketing analyses, financial analyses, etc. Qwest retail and wholesale access line counts are also tracked and reported at the wire center level. Qwest may, from time to time, market to customers based on wire center differentiations. For example, if voice mail capability was recently added to a particular wire center, Qwest might target market to those customers.

It should be noted that not all studies that rely on wire center information result in wire center level conclusions. Qwest does not believe that just because detailed information is available at the wire center level that wire centers always represent the appropriate focus of any particular analysis.

(3) MSA: Qwest uses the MSA (Metropolitan Statistical Area) distinction in its ARMIS Reports, as follows:

ARMIS 43-05, Service Quality Report:

Table II, Installation and Repair Intervals (Local Service) for Business and Residence. This table shows the number of installation orders and intervals, access lines, trouble reports and intervals.

Table IV.A, Occurrences of Two Minutes or More Switch Downtime. This table lists each incidence of switch downtime over two minutes and whether it occurred in an MSA or Non-MSA switch.

Table V, Service Quality Complaints. This table lists the number of federal and state complaints for business and residence. Access lines are also reported on this table.

ARMIS 43-07, Infrastructure Report:

Table I, Switching Equipment. This table includes number of switches (analog, digital, SS7 and ISDN), access lines, and ISDN interfaces.

These reports can be found on the FCC's website: www.fcc.gov/wcb/armis.

Qwest also uses the MSA distinction in developing competitive response marketing strategies. Qwest assesses the greater concentration of competitive pressure in MSAs - as a general rule, CLECs tend to disproportionately focus on serving customers in Qwest's larger communities

in Washington, which fall within the MSAs in the state. In large part, this is due to the concentrations of customers in the MSAs and the ability of CLECs to efficiently serve those customers. To the extent CLECs utilize their own switching and/or transport and loops to serve customers, economies of scale and scope are typically more favorable in areas encompassed by MSAs than in exchanges more rural in nature.

Finally, the FCC allows pricing flexibility on interstate access services based on a showing of CLEC competitive by MSA. Qwest presently has pricing flexibility for interstate access services in 31 out of 33 Qwest MSAs.

(4) Deaveraged Rate Zone: The deaveraged rate zone distinction is relevant because the FCC and the Commission have established these zones for purposes of pricing Qwest's unbundled loops in Washington. The deaveraged rates are incorporated into Qwest's wholesale tariff and SGAT, and unbundled loops are billed on a deaveraged basis to CLECs. Thus, the deaveraged rate zone differentiation is relevant from an economic standpoint and an operational standpoint.

(5) & (6) Entire State/Entire Service Area: Qwest generally uses the terms "entire state" or "entire service area" interchangeably, as the area outside of Qwest's service area in a state has little impact or relevance on Qwest from an economic, marketing, or operational standpoint. Generally, when Qwest provides financial information and regulatory reports, those are provided on a state-specific basis, and contain information for Qwest's service territory within the particular state. Qwest generally markets its products and services on a statewide basis because of the media that reaches everyone in the state. Some of Qwest's marketing efforts, such as the Spirit of Service advertisements, are region-wide.

(7) Other Level of Differentiation Qwest Uses: Qwest uses various other differentiations. For example, Qwest uses the exchange as another category of differentiation. The exchange is defined in Qwest's tariffs in accordance with Commission rules, "Exchange" means a geographic area established by a company for telecommunications service within that area. WAC 480-120-021. and is a geographic area established by a common communications carrier for the administration and pricing of telecommunications services in a specific area that usually includes a city, town, or village. Callers can always make an intraexchange call without incurring toll charges, and may also be able to make many interexchange calls without paying toll, depending upon how the local calling areas in each exchange have been defined.

Within a state, various organizations may be segmented or structured in ways that make sense for that specific state. For example, the Network organization has groups that work on engineering/construction/installation/maintenance for the "Seattle Metro" area, for the Olympic Peninsula, for Eastern Washington, and for "out state" (meaning Western Washington excluding Seattle and the Olympic peninsula). Network construction contracts may be entered into within the state based on the same or similar distinctions.

Respondent: Qwest Legal Department

Washington
UT-033044
WUTC 2-Bench Requests-064

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 064

Please provide separately for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the total number of business voice-grade equivalent lines served, as well as the number of business voice-grade equivalent lines that:

- (a) Qwest directly serves;
- (b) CLECs are serving through UNE-L;
- (c) CLECs are serving through UNE-P; and
- (d) CLECs are serving through resale.

RESPONSE:

a. Please see HIGHLY CONFIDENTIAL ATTACHMENT "A" for a report by wire center of all business voice-grade equivalent lines that Qwest directly serves.

b. Please see HIGHLY CONFIDENTIAL ATTACHMENT "B" for a report by wire center of all business voice-grade equivalent lines that CLECs are serving through UNE-L. At this time, Qwest has no way to differentiate whether UNE-L lines are used by CLECs to serve residential or business customers, and represents for purposes of this response that all UNE-L lines are being used to serve business customers. However, as CLECs provide discovery responses in this proceeding identifying the proportion of UNE-L lines actually used to serve business customers, Qwest will reflect that information in its direct testimony to be filed in December.

c. Please see HIGHLY CONFIDENTIAL ATTACHMENT "C" for a report by wire center of the estimated number of business voice-grade equivalent lines that CLECs are serving through UNE-P. Since Qwest cannot directly track the number of UNE-P lines CLECs are using to serve business customers, Qwest has identified the quantity of UNE-P telephone numbers appearing in the residential section of the Qwest White Pages database, and subtracted those quantities from the total UNE-P quantities in service. The remainder is identified for this purpose as being business UNE-P lines in service. Since only a fraction of all business lines in service actually appear in the White Pages, a simple reporting of UNE-P business listings understates the actual number of UNE-P lines being used for business purposes.

d. Please see HIGHLY CONFIDENTIAL ATTACHMENT "D" for a report by wire center

of all business voice-grade equivalent lines CLECS are serving through resale.

Respondents: Elaine Garley, Qwest Manager
Maryann Klasinski, Qwest Manager

Washington
UT-033044
WUTC 2-Bench Requests-065

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 065

Please provide separately for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the number of residential voice-grade equivalent lines served, as well as the number of residential voice-grade equivalent lines that:

- (a) Qwest directly serves;
- (b) CLECs are serving through UNE-L;
- (c) CLECs are serving through UNE-P; and
- (d) CLECS are serving through resale.

RESPONSE:

a. Please see CONFIDENTIAL ATTACHMENT "A" for a report by wire center of all residential lines that Qwest directly serves.

b. At this time, Qwest has no way to differentiate whether UNE-L lines are used by CLECs to serve residential or business customers, and represents for purposes of this response that all UNE-L lines are being used to serve business customers. However, as CLECs provide discovery responses in this proceeding identifying the proportion of UNE-L lines actually used to serve residential customers, Qwest will reflect that information in its direct testimony to be filed in December.

c. Please see HIGHLY CONFIDENTIAL ATTACHMENT "B" for a report by wire center of the estimated number of residential voice-grade equivalent lines that CLECs are serving through UNE-P. UNE-P is identified in Qwest systems as being used for residential or business purposes - these services are generic, wholesale services provide by Qwest to CLECs. To estimate the number of residential UNE-P lines in service, Qwest compared the telephone numbers associated with UNE-P lines in service against the current White Pages listings database, and identified the quantity of UNE-P telephone numbers shown in the residential section of that database. This is the only means Qwest has of approximating the number of UNE-P residential lines in service, and the results of this analysis are reflected in HIGHLY CONFIDENTIAL ATTACHMENT "B."

d. Please see HIGHLY CONFIDENTIAL ATTACHMENT "C" for a report by wire center of all the residential voice-grade equivalent lines CLECS are serving through resale.

Respondents: Elaine Garley, Qwest Manager
Maryann Klasinski, Qwest Manager

Washington
UT-033044
WUTC 2-Bench Requests-066

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 066

For the most recent quarter for which such information is available, please provide for each Qwest end-office switch, by applicable CLLI code, the CLLI code of each tandem switch on which the end-office switch homes.

RESPONSE:

Please see Attachment "A" for the requested information.

Respondent: Maryann Klasinski, Qwest Manager

Washington
UT-033044
WUTC 2-Bench Requests-067

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 067

Please identify each Qwest wire center in Washington state, identified by name, address, and CLLI code, that does not have fiber connectivity for purposes of interoffice transport.

RESPONSE:

Please see Highly Confidential Attachment "A" for the requested information.

Respondent: Maryann Klasinski, Qwest Manager

Washington
UT-033044
WUTC 2-Bench Requests-068

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 068

Please provide, for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the number of in-service collocation arrangements that you have in place. For each such collocation arrangement, please identify the carrier to whom you have sold or with whom you have made these collocation arrangements, and the type of collocation that you are providing.

RESPONSE:

Please see Highly Confidential Attachment "A" which includes all types of collocation currently offered by Qwest.

Respondent: Maryann Klasinski, Qwest Manager

Washington
UT-033044
WUTC 2-Bench Requests-069

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 069

Please provide, for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the number of provisioned collocation arrangements that you have in place that have yet to be activated, and for each such collocation arrangement, please identify the carrier to whom you have provided these collocation arrangements, and the type of collocation.

RESPONSE:

Qwest does not monitor when a CLEC activates their facilities to provide services to their customer and so Qwest has no knowledge regarding the information sought in this Bench Request.

Respondent: Maryann Klasinski, Qwest Manager

Washington
UT-033044
WUTC 2-Bench Requests-070

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 070

Please provide, for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the number of pending collocation arrangements. For each such collocation arrangement, please identify the carrier to whom you have provided these collocation arrangements, and the type of collocation arrangement.

RESPONSE:

Please see Highly Confidential Attachment "A" for the requested information.

Respondent: Maryann Klasinski, Qwest Manager