

BEFORE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of Qwest Corporation to
Initiate a Mass-Market Switching and Dedicated Transport
Case Pursuant to the Triennial Review Order

Docket No. UT-033044

**RESPONSES OF ADVANCED TELCOM, INC.
AND SHARED COMMUNICATIONS SERVICES, INC.
TO COMMISSION BENCH REQUESTS
ON BATCH HOT CUT PROCESS**

Advanced TelCom, Inc. d/b/a Advanced TelCom Group (“ATI”) and Shared Communications Services, Inc. (“SCS”) (ATI and SCS will be referred to collectively hereinafter as “ATG”) hereby provide the following responses to Commission Bench Requests directed to parties other than Qwest Corporation (“Qwest”) on batch hot cut process issues, specifically requests numbers 32-38.

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ATG Responses to Hot Cut Bench Requests 32-38
November 19, 2003

BENCH REQUEST NO. 32:

Describe the hot cut process currently used to transfer lines from Qwest switches to your facilities.

RESPONSE:

ATG does not currently use a hot cut process to transfer lines from Qwest switches to ATG facilities and thus lacks sufficient personal knowledge to respond to this request.

Prepared by: Meredith H. Gifford 770-644-7774

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BENCH REQUEST NO. 33:

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

- (a) the average time it takes to complete the task;
- (b) the typical occurrence of the task during the process;
- (c) the labor rate for the task; and
- (d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

RESPONSE:

See Response to Bench Request No.32.

Prepared by: Meredith H. Gifford 770-644-7774

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BENCH REQUEST NO. 34:

Describe a batch hot cut process that you would implement to meet the FCC's requirement to establish a batch hot cut process. Please include an estimate of the maximum number of lines that should be processed in each batch.

RESPONSE:

ATG has not analyzed or taken any position on the batch hot cut process that Qwest would need to implement in Washington to meet the FCC's requirements.

Prepared by: Meredith H. Gifford 770-644-7774

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BENCH REQUEST NO. 35:

Please list each task that is part of the batch cut process described in your response to Bench Request No. 35, above. For each task, please provide the following information:

- (a) the average time it takes to complete the task;
- (b) the typical occurrence of the task during the process;
- (c) the labor rate for the task; and
- (d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

RESPONSE:

See Response to Bench Request No. 34.

Prepared by: Meredith H. Gifford 770-644-7774

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BENCH REQUEST NO. 36:

Beginning on January 1, 2003, please provide the average total cost per line that you incurred to manage and participate in Qwest's hot cut process, including, but not limited to, Qwest's non-recurring charges, for lines used to service residential and business mass-market customers in Qwest's service territory within Washington State. If the average total cost per line discussed above is different for residential and business mass-market customers, please identify the average total costs separately.

RESPONSE:

See Response to Bench Request No. 32.

Prepared by: Meredith H. Gifford 770-644-7774

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BENCH REQUEST NO. 37:

If the Commission determines that competitive carriers are not impaired without access to switching in the mass-market, please identify, by Qwest wire center in Washington State, what monthly volumes of hot cuts would be required within the first 12 months after the effective date of the decision: (a) to migrate existing UNE-P customers to UNE-L or another form of service, and (b) to connect new customers in the ordinary course of business. Please provide supporting documentation for these volume estimates.

RESPONSE:

(a) For existing ATG UNE-P customers, ATG does not know the monthly volumes of hot cuts that would be required within the first 12 months after the effective date of the decision. ATG does, however, have data regarding the number of accounts and lines that it currently serves with UNE-P in the Qwest wire centers in Washington State, which customers would have to be migrated to UNE-L or another form of service if the Commission determines that competitive carriers are not impaired without access to switching in the mass market. That data is as follows:

SEE HIGHLY CONFIDENTIAL ATTACHMENT A, AS PER PROTECTIVE ORDER IN
WUTC DOCKET NO. UT-033044

(b) For new ATG customers that would need to be connected in the ordinary course of business, ATG has the following estimates of monthly volumes of hot cuts that would be required within the first 12 months after the effective date of the decision if the Commission determines that competitive carriers are not impaired without access to switching in the mass market:

SEE HIGHLY CONFIDENTIAL ATTACHMENT A, AS PER PROTECTIVE ORDER IN
WUTC DOCKET NO. UT-033044

Prepared by: Meredith H. Gifford 770-644-7774

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BENCH REQUEST NO. 38:

Please describe any circumstances in which you believe Qwest has performed deficiently in providing you with hot cuts in Washington State since January 1, 2003. Please provide a complete description of all facts that you rely upon as well as documents that support your assertion.

RESPONSE:

See Response to Bench Request No. 32.

Prepared by: Meredith H. Gifford 770-644-7774

Dated this 19th day of November, 2003.

As to legal issues:

DAVIS WRIGHT TREMAINE LLP

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