

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
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**RESPONSES OF INTEGRA TELECOM OF WASHINGTON, INC.,
TO COMMISSION BENCH REQUESTS
ON BATCH HOT CUT PROCESS**

Integra Telecom of Washington, Inc. (“Integra”) hereby provides 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.

WUTC Docket No. UT-033044
Integra Responses to Hot Cut Bench Requests
November 19, 2003

BENCH REQUEST NO. 32:

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

RESPONSE:

Integra does not currently use a hot cut process to transfer lines from Qwest UNE-P.

Prepared by: Karen Johnson
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WUTC Docket No. UT-033044
Integra Responses to Hot Cut Bench Requests
November 19, 2003

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:

Integra does not currently use a hot cut process to transfer lines from Qwest UNE-P.

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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:

Integra has not taken a position on this issue and does not look to implement a batch hot cut process.

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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 [*sic*], 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:

Not applicable. See Response to Bench Request No. 34.

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November 19, 2003

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:

Integra has not incurred any costs in 2003 related to Qwest's hot cut process in Washington State.

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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:

Integra lacks sufficient knowledge to respond to this Request.

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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:

Integra has not been provided with any hot cuts from Qwest in 2003 in Washington State.

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Dated this 19th day of November, 2003.

As to legal issues:

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By: _____
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