

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

In the Matter of the Petition of Qwest Corporation for Arbitration with Eschelon Telecom, Inc., Pursuant to 47 U.S.C. Section 252 of the Federal Telecommunications Act of 1996))))))	DOCKET NO. UT-063061
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**RESPONSIVE TESTIMONY OF
CURTIS ASHTON
QWEST CORPORATION**

(Disputed Issues Nos. 8-21, 8-21(a), 8-21(b), 8-21(c), 8-21(d) and 8-22)

December 4, 2006

TABLE OF CONTENTS

	Page
I. IDENTIFICATION OF WITNESS	1
II. PURPOSE OF TESTIMONY	2
III. ISSUE 8-21 (AND SUBPARTS (A) – (D)).....	2
IV. ISSUE 8-22	14

1 **I. IDENTIFICATION OF WITNESS**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH**
3 **QWEST CORPORATION.**

4 A. My name is Curtis Ashton. I am employed by Qwest Corporation (“Qwest”) as a
5 senior staff technical support power maintenance engineer in the technical support
6 group, local network organization. My business address is 700 W. Mineral, Littleton,
7 Colorado, 80120.

8
9 **Q. PLEASE REVIEW YOUR WORK EXPERIENCE AND PRESENT**
10 **RESPONSIBILITIES.**

11 A. I hold a Bachelor of Science in electrical engineering, summa cum laude from Arizona
12 State University. I have been responsible for managing telecommunications power for
13 Qwest and its predecessors since 1992. All of the positions I've held with Qwest
14 Communications (formerly U S WEST Communications), including my current
15 position, have dealt with power management. In my current position, I am the subject
16 matter expert for all powering and grounding issues for Qwest’s Local Network
17 organization. I have worked with power issues as they relate to collocation since the
18 original FCC collocation order in 1992. In addition, I have presented papers at multiple
19 conferences and have been published in conference proceedings and trade magazines.
20 Among the presentations are two on collocation powering. I am also a vice-chair of
21 several sub-committees of the Institute of Electrical and Electronics Engineers (IEEE)
22 stationary battery standards committee. In the past I served a term on the general IEEE
23 standards review committee (RevCom).

24

1 **II. PURPOSE OF TESTIMONY**

2 **Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.**

3 A. The purpose of my testimony is to reply to certain portions of the Direct Testimony
4 filed by Eschelon witness Michael Starkey, relating to charges for DC Power. In
5 particular, I address issue 8-21, including subsections (a) – (d), relating to charges for
6 DC Power Plant. I also address issue 8-22 relating to the Quote Preparation Fee
7 associated with Power Reduction and Power Restoration.

8
9 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS DOCKET REGARDING**
10 **THESE ISSUES?**

11 A. No. Qwest witness Robert J. Hubbard previously testified regarding these issues in his
12 Direct Testimony in this case, filed on September 29, 2006. I adopt Mr. Hubbard's
13 Direct Testimony on these issues, and respond to the arguments presented by Mr.
14 Starkey in his Direct Testimony on these issues.

15
16 **III. ISSUE 8-21 (AND SUBPARTS (A) – (D))**

17 **Q. WHAT IS THE ISSUE IN DISPUTE?**

18 A. As Mr. Hubbard stated in his direct testimony, there are several disputed issues in the
19 ICA (issues 8-21, 8-21(a), 8-21(b), 8-21(c), 8-21(d)) that relate to Qwest's provisioning
20 of -48 Volt DC Power to CLEC collocations within Qwest's central offices. For each
21 of these issues, beginning with Issue 8-21, a core dispute is whether language in the
22 ICA pertaining to billing on a measured basis for the DC Power used by a CLEC
23 should apply to both the power plant and power usage charges described in the ICA , as
24 Eschelon contends, or only to the power usage charge, as Qwest contends. As Mr.
25 Hubbard also suggested in his direct testimony, and as Qwest witness Teresa Million

1 has testified, these types of issues involving cost evidence and challenges to existing,
2 approved rates are clearly better suited for resolution in a cost proceeding like a cost
3 docket. Ms. Million describes this in greater detail in her Responsive Testimony.
4 Nonetheless, I feel compelled to respond here to certain portions of Mr. Starkey's
5 testimony where he misstates facts relating to DC power in Qwest central offices, and
6 Qwest's engineering of power plant in the central office.

7
8 **Q. HOW DOES QWEST DESIGN A POWER PLANT?**

9 **A.** Qwest engineers take the total requirement of all power needs into consideration when
10 designing the power plant for a central office. What I mean by this is that the engineer
11 factors in not only the power requirements of Qwest equipment, but also collocators
12 (CLECs) within that central office. For example, when a CLEC provides Qwest with
13 an order for a power feed (sometimes referred to as power distribution or power
14 cables), Qwest provisions the feed at the requested amount, and ensures that the power
15 plant has sufficient spare capacity to provide that ordered amount of power. If the
16 existing plant does not have sufficient spare capacity to accommodate the CLEC's
17 order then Qwest will add capacity as needed. Mr. Starkey states that Qwest designs a
18 Central Office power plant based on List 1 drain – the current that the equipment will
19 draw when fully carded on the busiest hour of the busiest day of the year – and that is
20 correct for Qwest equipment. However, the reality of designing for CLEC needs is that
21 Qwest does not know, cannot know, and cannot reasonably forecast the draw that
22 CLEC equipment will take, so Qwest uses the ordered amount to size the power plant
23 capacity made available to CLECs. Qwest plans its DC power plant capacity so that if
24 a CLEC orders a certain amount of power capacity in its power feeds, that amount of
25 power capacity is made always available to them in the power plant.

1 **Q. DOESN'T ESCHELON TELL QWEST WHAT ITS ANTICIPATED USAGE**
2 **WILL BE WHEN IT PLACES AN ORDER?**

3 A. No, Eschelon does not. Since Eschelon cannot forecast its own usage, Qwest, who has
4 less information about Eschelon's business plans, certainly cannot do so either. Under
5 those circumstances, the only reasonable amperage to include in power plant planning
6 for CLECs is the ordered amount, as that is the amount that the CLEC has indicated it
7 needs via its order. It is also the only number that Qwest has to plan to. If a CLEC
8 orders a 100 amp feed, Qwest plans accordingly. There is no basis for Qwest to even
9 guess at what power the CLEC may draw over that feed, or when the CLEC may need
10 that ordered amount of power.

11
12 **Q. CAN QWEST MEASURE THE COMBINED LIST 1 DRAIN OF ESCHELON'S**
13 **COLLOCATED EQUIPMENT?**

14 A. No. As I explain in more detail later in my testimony, Qwest can determine the peak
15 load or usage of all the telecommunications equipment in a central office, but this will
16 not allow Qwest to determine the discrete list 1 drain for a given CLEC's equipment.
17 For CLECs electing power measurement Qwest will take random usage measurements
18 2-4 times per year, but this will not allow Qwest to determine the combined peak drain
19 of a given CLEC's collocated equipment, let alone the discrete List 1 drain for each
20 piece of equipment collocated by that CLEC. Nor can Qwest predict what the CLEC
21 equipment current drain will be if the CLEC adds cards and customers, or even
22 equipment. The Engineering and Installation interval for power plant components (3-6
23 months) is such that if a CLEC adds cards, customers, or totally new equipment (only
24 with the latter does the CLEC have to tell Qwest that it is growing, and even then with
25 only 90 days of pre-notification), Qwest must have the power plant capacity available

1 ahead of time. The only way to ensure that happens is to size the power plant capacity
2 for the amount of power capacity ordered by the CLEC.

3

4 **Q. CAN QWEST ESTIMATE THE COMBINED LIST 1 DRAIN OF ESCHELON'S**
5 **COLLOCATED EQUIPMENT?**

6 A. This would be dangerous for the reasons described in the previous example (the
7 possibility of running out of power plant capacity due to CLEC growth before more
8 capacity can be added).

9 Also, while Qwest on very rare occasions estimates List 1 drain for itself (as Mr. Starkey
10 points out, this is supported by Qwest technical documentation), it does so with
11 equipment with which it is familiar (installed in many offices and tested in Qwest labs).
12 Qwest has no field or lab experience with many types of CLEC equipment, so estimating
13 a List 1 drain could lead to an underestimation. Underestimating the necessary power
14 plant capacity will not only be harmful to CLEC equipment, but to all equipment in the
15 Central Office, since (as Mr. Starkey points out) the power plant is a shared resource.
16 Insufficient capacity will cause the batteries to drain to such a voltage that all the
17 equipment will fail.

18

19 **Q. WHY DOESN'T QWEST SIMPLY ASK ESCHELON TO PROVIDE ITS**
20 **ANTICIPATED USAGE, OR THE COMBINED LIST 1 DRAIN OF THE**
21 **EQUIPMENT THAT ESCHELON INTENDS TO COLLOCATE?**

22 A. Even if Eschelon provided an accurate List 1 drain for all of its collocated equipment,
23 that number would be irrelevant, as Ms. Million describes in greater detail in her
24 Responsive testimony. The rate for DC Power Plant was not designed based on the List

1 1 drain for CLEC equipment, or any other measure of CLEC usage. Accordingly, there
2 would be no reason to ask CLECs for that information in the collocation application.

3 In addition, List 1 drain is a combination of data provided by manufacturer testing
4 combined with Qwest lab and field experience with the equipment. A manufacturer may
5 give a List 1 drain, but oftentimes Qwest has adjusted that drain in its Engineering tools
6 based on lab and field experience. Even if a CLEC were to provide a manufacturer's List
7 1 drain, Qwest has no idea of the conditions under which that drain was obtained. It's
8 possible that the List 1 drain is too low, and as I previously stated, using that drain to size
9 the power plant could have disastrous consequences.

10 Finally, to be very clear, while Mr. Starkey talks about List 1 drain throughout his
11 testimony, Eschelon is not asking to be billed based on List 1 drain. Eschelon is asking
12 to be billed based on random measurements of its power usage, which is something
13 entirely different. I discuss this in more detail later, but this also makes the debate over
14 whether Qwest should ask for List 1 drain somewhat academic. Eschelon is NOT asking
15 here to be billed for power plant based on the List 1 drain of its equipment.

16
17 **Q. UNDER WHAT CIRCUMSTANCES WOULD THE CLEC NEED OR USE THE**
18 **ORDERED AMOUNT OF POWER?**

19 A. A good example of a situation in which the ordered amount of power could be required
20 would be if Qwest had a complete power failure within a central office, and the
21 batteries fully discharged. During power outages, the power to the telecommunication
22 equipment is supplied by batteries. For a time, a diesel engine would be supplying
23 additional backup power for the batteries. If the engine cannot be refueled, the batteries
24 would become the sole source of power. Once the power backup plant is running

1 solely off battery power, the batteries begin to discharge. Once the batteries are no
2 longer sufficient to power the equipment, the equipment would shut down. After
3 power is restored, CLEC and Qwest equipment would draw an amount of power
4 approaching or reaching the maximum power draw of that equipment. This is
5 sometimes referred to as a “List 2 Event.” Qwest designs the power plant so that in
6 such an event, CLEC and toll equipment within the central office will have the List 2
7 drain available to them, ahead of even Qwest’s own switch.¹ A central office power
8 plant is sized on the total requirement of every piece of equipment that has a power
9 drain. Indeed, under the List 2 drain situation described above, each and every piece of
10 Eschelon’s equipment in the central office would have List 2 drain power capacity
11 available to it.

12
13 **Q. ESCHELON TALKS ABOUT WANTING TO PAY FOR POWER PLANT ON AN**
14 **“AS CONSUMED” OR “MEASURED” BASIS. IS POWER PLANT**
15 **“CONSUMED” IN THE SAME WAY THAT POWER ITSELF IS CONSUMED?**

16 **A.** No, of course not. First, it is important to observe that power plant is not “consumed.”
17 Power plant consists of several durable pieces of equipment that last for years. As Mr.
18 Starkey states, power plant capacity is shared among the several users of power in a
19 central office, but power plant capacity is not consumed. A better way to describe
20 power plant capacity is in terms of availability, rather than consumption. For any
21 particular power user, the question is whether there is sufficient capacity in the power
22 plant available to convert and deliver the electric current its telecommunications
23 equipment may eventually consume. That is a completely different question than how

¹ The engineering characteristics of Qwest’s switches require that they be restored in stages after a battery discharge event described above. Thus, the List 2 draw for these switches is not experienced at one time – but not as a result of the availability of power plant capacity or the switches’ need for power.

1 much electric current the telecommunications equipment actually consumes on an hour-
2 by-hour basis.

3 Secondly, power plant is a fixed investment, and the costs of that plant do not vary with
4 usage. The amount of power that Eschelon may consume at the point in time that any
5 particular power measurement is taken may not bear any relationship to the amount of
6 power plant capacity that Eschelon has ordered or that Qwest makes available to
7 Eschelon. Third, while electric power usage (in Amps or Watts) is measured, the
8 “measurement” of DC power plant capacity does not change until there are additions of
9 primary components (e.g., batteries, rectifiers, etc.) that make additional power plant
10 capacity available to power users. In other words, power plant is not amenable to
11 “measurement.”

12
13 **Q. ON LINES 17-18 OF PAGE 106 MR. STARKEY REFERS TO QWEST**
14 **CHANGING THE WAY IT CHARGES FOR [POWER] USAGE. WILL YOU**
15 **PLEASE COMMENT?**

16 A. Mr. Starkey is correct when he states that Qwest has made available to CLECs the
17 option to be billed for power usage on a measured basis. I’m not sure what point Mr.
18 Starkey is making, though, in this regard. Does Qwest offer the option to pay for
19 power usage on a measured basis? Yes, it does. That is not remarkable, though. AC
20 Power is typically billed on a measured basis, such as cents per kW-hour. You can
21 measure kw-hours of AC Power consumed. You can measure amps of DC Power
22 consumed. You cannot measure the kw-hours or amps of rectifiers, batteries or
23 inverters “consumed.” The rectifiers, batteries and inverters that make up power plant
24 are not “consumed” or used up.

1 **Q. HOW DOES QWEST DETERMINE WHEN TO AUGMENT POWER PLANT IN**
2 **A CENTRAL OFFICE?**

3 A. Generally speaking there are three inputs that factor into a power plant augment
4 decision. Qwest designs and engineers power plant capacity sufficient to meet the total
5 busy hour load of all equipment present in the central office, plus all CLEC ordered
6 amounts of power, plus the anticipated busy hour drain of expected future Qwest
7 equipment additions. Qwest compares the sum of these three factors against the power
8 plant capacity currently installed in the central office, and ensures that the power plant
9 capacity installed remains greater than the sum of these three factors.

10

11 **Q. WHAT IS “BUSY HOUR LOAD?”**

12 A. Busy Hour Load in this context is the amount of power used by all equipment in the
13 central office on the busiest hour of the busiest day. Mr. Starkey often refers to this as
14 “peak drain” in his testimony, or sometimes as the List 1 Drain.

15

16 **Q. PLEASE COMMENT ON MR. STARKEY’S STATEMENT INDICATING THAT**
17 **POWER PLANT INVESTMENT IS “DRIVEN BY USAGE.”**

18 A. Qwest’s power plant investment is not “driven by usage,” and Mr. Starkey makes a
19 flawed leap in logic in the conclusion he draws in that regard. Mr. Starkey states that
20 peak drain drives power plant investment, and therefore, “power plant is driven by the
21 amount of DC Power used by the equipment in the central office.” Starkey Direct
22 Testimony, P. 108, lines 17-18. There are several problems with Mr. Starkey’s
23 conclusion. First, as I stated above, busy hour load (which Mr. Starkey refers to as
24 “peak drain” in his testimony) is only one of several variables that influences power
25 plant investment. Projected future deployment of Qwest equipment and the power

1 ordered by CLECs are also part of the power plant investment equation. Accordingly,
2 the amount of power *ordered* by the CLEC is also a factor driving power plant
3 investment.

4 Second, and more critically, Mr. Starkey chooses his words very carefully in his
5 testimony in order to blur a critical fact: The power “usage” that is a part of Qwest’s
6 power plant investment equation is NOT the same thing as the power usage upon which
7 Eschelon wants Qwest to charge for power plant. The peak “usage” or drain that Mr.
8 Starkey describes at pages 108-109 of his testimony is a single snapshot in time, and it is
9 a part of the power plant investment equation. It is what I previously described as the
10 “busy hour load,” -- the combined usage of all equipment in the central office at the
11 busiest hour of the busiest day. The specific and discrete CLEC measured usage that
12 would be captured several times per year for a CLEC electing power measurement is
13 something entirely different, however, and is NO part of the power plant investment
14 equation. Therefore, there can be no legitimate basis to charge a CLEC for power plant
15 based on its discrete measured usage (which is what Eschelon is arguing for here),
16 because that Eschelon-specific measured usage is no part of the power plant investment
17 equation. CLEC day-to-day usage does not drive power plant investment.

18
19 **Q. CAN YOU FURTHER EXPLAIN THE DIFFERENCE BETWEEN “PEAK”**
20 **USAGE AND CLEC-SPECIFIC MEASURED USAGE?**

21 A. Certainly. In his testimony Mr. Starkey describes “peak drain,” which again is the
22 combined usage of all equipment in the central office on the busiest hour of the busiest
23 day. When Qwest measures a CLEC’s usage and bills for usage on that basis under the
24 power measurement option, however, Qwest is measuring the CLEC’s discrete usage at
25 random times throughout the year, and not at “peak drain,” on the busiest hour of the

1 busiest day. Combined central office peak drain usage is a factor in planning power
2 plant investment. A specific CLEC's discrete and randomly measured usage
3 throughout the year is never a factor in planning power plant investment. Measured
4 CLEC usage—which is the basis upon which Eschelon wants Qwest to charge for
5 plant—therefore does not “drive” power plant investment. In fact, it is not even a
6 factor that goes into the decision about when to augment power plant. To illustrate,
7 assume a CLEC orders a single 100 amp power feed. Also assume that the CLEC
8 elects the power measurement option for power usage. Assume that random
9 measurements taken by Qwest three times during the year show usage of 47 amps, 25
10 amps and 32 amps. NONE of these numbers are any part of the equation that drives
11 Qwest power plant augment decisions. The amount of power *ordered* by the CLEC,
12 however—the 100 amps—*is* a part of that power plant investment calculus. Eschelon's
13 power order, then, certainly would drive power plant investment. Eschelon's discrete
14 measured power usage would not.

15
16 **Q. CAN YOU GRAPHICALLY ILLUSTRATE THE DIFFERENCE BETWEEN A**
17 **CLEC'S RANDOM MEASURED USAGE, THE LIST 1 DRAIN OF ITS**
18 **EQUIPMENT, AND THE LIST 2 DRAIN OF ITS EQUIPMENT?**

19 A. Yes, that is what my attached Exhibit CA-2 illustrates. The essence of Mr. Starkey's
20 testimony is that Eschelon wants to place a power order for its ultimate capacity needs,
21 Eschelon expects Qwest to make that capacity available, but Eschelon only wants to
22 pay based on measured usage, even though Qwest does in fact make the ordered
23 capacity available. Exhibit CA-2 demonstrates this principle. In that illustration the
24 top, green line is Eschelon's power order, indicating that Eschelon has ordered 100
25 amps. Qwest reasonably uses the ordered amount in its power planning process, and

1 makes decisions about power plant capacity based on the need to be able to provide the
2 ordered amount if required. The middle, blue line represents the List 1 drain of
3 Eschelon's equipment. This is the amount of power plant capacity that Eschelon claims
4 Qwest should assume for engineering purposes—even though Qwest does not know the
5 List 1 drain for Eschelon's equipment or when Eschelon might draw that amount, and
6 even though Qwest's power plant rate is not based on List 1 drain. Finally, the lowest,
7 red line reflects Eschelon's actual power consumption over a period of time. As the
8 illustration makes clear, that usage will fluctuate, and a random measurement of that
9 usage will not allow Qwest to determine the combined List 1 drain of Eschelon's
10 equipment (if that were even relevant).

11
12 **Q. WHY CAN'T QWEST JUST MEASURE ESCHELON'S PEAK USAGE AND**
13 **BILL FOR POWER PLANT ON THAT BASIS?**

14 A. First, Qwest does not know when Eschelon's peak usage will occur. Usage fluctuates,
15 as illustrated in Exhibit CA-2, and peak usage will be different for different CLECs. A
16 business-based CLEC like Eschelon will probably not experience peak usage on
17 Mother's Day or Christmas. Second, the Power Measurement option for usage billing
18 contemplates 2-4 random measurements throughout the year. After each measurement,
19 Qwest charges for usage based on that measurement at that fixed rate, until the time of
20 the next measurement. So, if a measurement indicated 47 amps of power were being
21 drawn over a power feed, Qwest would charge for 47 amps of power usage each month
22 until the next measurement occurred. Accordingly, if Qwest attempted to identify the
23 two peak moments of a given CLEC's usage each year, take measurements at those two
24 spikes, and bill at that peak level for a period of months, it is quite likely that the CLEC
25 would complain of this practice. Finally, and most importantly, as I stated previously,

1 even if Qwest could capture Eschelon's peak usage and treat that as a proxy for the
2 combined List I drain of Eschelon's equipment, that is NOT the basis on which Qwest
3 charges for power plant, it is NOT the basis on which the power plant rate was
4 designed, and it is NOT the basis on which Eschelon seeks to be charged for power
5 plant in this proceeding. Ms. Million testifies to this in greater detail.

6
7 **Q. MR. STARKEY ON PAGE 115 LINES 11 TO 14 INDICATES THAT QWEST IS**
8 **DISCRIMINATORY IN THE WAY IT CHARGES FOR POWER. PLEASE**
9 **COMMENT.**

10 A. As I stated previously, Qwest makes available to Eschelon the power capacity that it
11 has ordered. Qwest has no way of knowing if or when Eschelon's equipment will draw
12 upon that full capacity. If Eschelon determines that it does not require as much power
13 capacity as it anticipated, then it will have the option under the Power Reduction
14 language in its ICA to pay less by reducing the amount of fused power that Qwest
15 makes available to it. Eschelon has the ability to manage its power needs and charges
16 in the central office by availing itself of the Power Reduction and Power Measurement
17 options, if it so chooses. Fundamentally, though, Qwest will charge Eschelon for the
18 power capacity that Qwest makes available to Eschelon, and it is up to Eschelon to
19 manage its power requirements as it sees fit.

20
21 **Q. HAVE STATE COMMISSIONS CONSIDERED AND REJECTED THE SAME**
22 **DISCRIMINATION ARGUMENT THAT MR. STARKEY MAKES HERE?**

23 A. Yes. Both an Administrative Law Judge (in a Recommended Decision not yet adopted
24 by this Commission) and The Utah Public Service Commission have rejected the very
25 same discrimination argument that Mr. Starkey makes here. Mr. Starkey also

1 represents McLeodUSA Telecommunications Services, Inc. (“McLeod”) in complaint
2 proceedings that McLeod brought in several states regarding Qwest’s DC Power Plant
3 rate. While I am not a lawyer I have represented Qwest as a witness in those
4 proceedings, and the discrimination argument Mr. Starkey has made there is the same
5 argument he makes here. In the proceeding before this Commission, the
6 Administrative Law Judge found in a Recommended Decision that “[t]he record in this
7 proceeding does not support a claim that Qwest’s DC power plant rate or rate
8 structure is discriminatory.”² The Utah Commission also rejected Mr. Starkey’s
9 argument, indicating that a CLEC’s power cable order is its power plant order, and
10 finding that “Qwest’s billing to McLeod for DC Power Plant does not constitute
11 discriminatory conduct.”³

12
13 **IV. ISSUE 8-22**

14 **Q. DO YOU HAVE ANYTHING TO ADD TO MR. HUBBARD’S DIRECT**
15 **TESTIMONY ON THIS ISSUE?**

16 A. This issue relates to the Quote Preparation Fee (“QPF”) that Qwest charges for Power
17 Reduction or Power Restoration orders. Qwest now understands that Eschelon’s
18 position is that it should not be required to pay this QPF for any Power Reductions, nor
19 should it be required to pay the QPF for Power Restorations with Reservation. Ms.
20 Million addresses this in more detail in her Responsive Testimony. The bottom line is

² *McLeodUSA Telecommunications Services, Inc. v. Qwest Corporation*, Washington State Utilities and Transportation Commission, Docket UT-063013, Initial Order: Recommended Decision to Deny Petition for Enforcement, September 29, 2006, p. 24. (Attached as Exhibit CA-3).

³ *In the Matter of McLeodUSA Telecommunications Services, Inc. v. Qwest Corporation for Enforcement of Commission-Approved Interconnection Agreement*, Public Service Commission of Utah Docket No. 06-2249-01, September 28, 2006 Report and Order, p. 28 (Attached as Exhibit CA-4).

1 that Qwest does incur costs that are recovered by the QPF, that rate has been approved
2 by this Commission, and Qwest is entitled to therefore charge that QPF.

3

4 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

5 A. Yes it does.

6