

[Service Date October 21, 2003]

October 21, 2003

**NOTICE OF ISSUANCE OF COMMISSION BENCH REQUESTS 1-38
(Due on Monday, November 3, 2003)**

RE: 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.

TO ALL PARTIES:

The Commission issues the following Bench Requests in Part A to Qwest Corporation (Qwest) and the Bench Requests in Part B to all other parties in this proceeding. The Commission issues these bench requests as a part of the process of reviewing the findings of the Federal Communications Commission (FCC) in its Triennial Review Order (Order) concerning mass-market switching. The responses to these bench requests are intended to assist the Commission in conducting the granular fact-based analysis required by the Order.

The FCC based its finding of impairment for mass-market switching upon evidence of economic and operational barriers caused by the current hot cut processes of incumbent local exchange carriers (ILECs). *Triennial Review Order at ¶¶ 459 and 460.* Under the Order, the Commission must evaluate, in each geographic market for mass-market switching in Washington State, whether current hot cut processes give rise to impairment, and if so, to “approve and implement a batch-cut process that will render the hot cut process more efficient and reduce per-line hot cut costs.” *Id.*, at ¶ 460; *see also* ¶¶479-490.

Some of the bench requests seek company-specific information of the type that might impose a serious business risk if disseminated without heightened protection. Companies may designate their responses to these bench requests as necessary as “Confidential” or “Highly Confidential” pursuant to the protective order entered in this proceeding, Order No. 02, Protective Order. Because of the

nature of this proceeding and the burdens on all parties to evaluate the data, all parties will have access to the data, although such access will be limited under the protective order.

Upon the conclusion of this proceeding, the Commission and all parties must return all confidential data to the competitive local exchange carrier (CLEC) or ILEC that provided it, or at the option of the CLEC or ILEC, shall destroy all such data. If confidential information has been made an exhibit in the proceeding, the Commission will retain the information under seal as provided in the protective order.

Please provide responses to each of the following requests electronically, as well as on separate sheets of paper and repeat the bench request at the top of the page on which the response begins. Information must be supplied using software and formatting that would allow the Commission to review the data easily. Also, indicate on both the hard copy and the electronic version provided, the date the bench response was prepared, the individual who prepared the response, and the telephone number of the preparer. Please send your responses via U.S. Mail to: Carole Washburn, Secretary, Washington Utilities and Transportation Commission, P.O. Box 47250, Olympia, WA 98504, and send electronic response to the Records Center at records@wutc.wa.gov.

A. QUESTIONS FOR QWEST:

BENCH REQUEST NO. 1:

Please confirm that the list of interconnection agreements located on the Telecommunications page of Commission's web site <www.wutc.wa.gov> accurately reflects the currently effective Qwest interconnection agreements in Washington State.

BENCH REQUEST NO. 2:

Please provide, in an electronic format, and on a monthly basis beginning on January 1, 2003, for every Qwest wire center in Washington State, the number of UNE-P lines in service at the beginning of the month, added during the month, disconnected during the month, and in service at the end of the month.

BENCH REQUEST NO. 3:

Please provide, in an electronic format, and on a monthly basis beginning on January 1, 2003, for every Qwest wire center in Washington State, the number of UNE-L lines in service at the beginning of the month, added during the month, disconnected during the month, and in service at the end of the month.

BENCH REQUEST NO. 4:

Please describe and provide documentation showing the hot cut process Qwest currently uses to transfer lines from Qwest switches to CLEC facilities, i.e., to convert a loop provided under a UNE-P arrangement (served by Qwest's unbundled switch) to UNE-L (served by a CLEC switch).

BENCH REQUEST NO. 5:

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.

BENCH REQUEST NO. 6:

Please describe a batch cut process that Qwest would implement to meet the FCC's requirement to establish a batch hot cut process. Please include an estimate of the number of lines that Qwest proposes to process in each batch, as well as the date by which Qwest could implement such a process.

BENCH REQUEST NO. 7:

Please list each task that is part of the batch cut process described in your response to Bench Request No. 6, 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.

BENCH REQUEST NO. 8:

Based on your responses to Bench Request Nos. 4 through 7, please list each task that is part of Qwest's proposed batch hot cut process that is not included in Qwest's current hot cut process.

BENCH REQUEST NO. 9:

Based on your responses to Bench Request Nos. 4 through 7, please list each task that is part of Qwest's current hot cut process that is not included in Qwest's proposed batch hot cut process.

BENCH REQUEST NO. 10:

Please provide, in an electronic format, and on a monthly basis beginning on January 1, 2003, for every Qwest wire center in Washington State, the total number of residential lines served and the total number of residential lines served using integrated digital line carrier. Please provide separately, on a monthly basis for every wire center, the number of Qwest residential lines, UNE served residential lines, and wholesale served residential lines served.

BENCH REQUEST NO. 11:

- (a) Please provide, in an electronic format, and on a monthly basis beginning on January 1, 2003, for every Qwest wire center in Washington State, the total number of business mass-market lines served and the total number of business mass-market lines served using integrated digital line carrier. Please provide separately, on a monthly basis for every such wire center, the number of Qwest business mass-market lines, UNE served business mass-market lines, and wholesale served business mass-market lines served.
- (b) Please explain how you determined which business lines were mass-market lines and which were enterprise lines.

BENCH REQUEST NO. 12:

If the tasks related to Qwest's current hot cut process for lines served using integrated digital line carrier differ from the process used for other lines, please discuss how the process is different and list the tasks that must be added specifically for the lines served using integrated digital line carrier. Please include the time required to accomplish those tasks.

BENCH REQUEST NO. 13:

Please provide, on a monthly basis beginning on January 1, 2003, the average time a customer's service was disconnected due to Qwest's current hot cut process.

BENCH REQUEST NO. 14:

Please describe in detail any process Qwest has to restore service if an end-user experiences problems resulting in loss of service during a hot cut.

BENCH REQUEST NO. 15:

Please provide on a monthly basis beginning on January 1, 2003, for each Qwest wire center in Washington State, the number of loop cutovers that resulted in the loop being swung back to Qwest's switch, the number of such swing backs occurring within 10 days of the provisioning due date and the number occurring beyond 10 days of the provisioning due date.

BENCH REQUEST NO. 16:

Please provide, on a monthly basis beginning on January 1, 2003, by Qwest wire center in Washington State, the number of and the total charges assessed for unbundled loop cutovers when the "CHC" field on Qwest's LSR form is populated with a "Y" for existing customers, separated between each type or classification of cutover provided by Qwest, including, but not limited to, "coordinated installation with cooperative testing," "coordinated installation without cooperative testing," "frame due time," or "project coordinated installation" cutovers.

BENCH REQUEST NO. 17:

Beginning on January 1, 2003, please state the highest number of unbundled loop cutovers Qwest has ever performed in a single day for each Qwest wire center in Washington State based upon LSRs submitted when the "CHC" field on the LSR form is populated with a "Y." If there are differences in the maximum number of cutovers that can be performed in a wire center or geographic area, please explain the reasons for the differences.

BENCH REQUEST NO. 18:

Please provide, on a monthly basis beginning on January 1, 2003, by Qwest wire center in Washington State, the average number of lines Qwest processed on an order when the "CHC" field on the LSR form was populated with a "Y." Please state the number of observations used to develop the average.

BENCH REQUEST NO. 19:

Please provide, on a monthly basis, beginning on January 1, 2003, the number of Qwest technicians in Qwest's service territory in Washington State trained and capable of transferring a line from a Qwest switch to a CLEC facility as part of Qwest's current hot cut process. Please count only those employees who can perform the manual process. Please do not include management or supervisory personnel who can perform these tasks but do not do so as part of their regular work effort.

BENCH REQUEST NO. 20:

Please provide, on a monthly basis, beginning on January 1, 2003, the number of Qwest technicians in Qwest's service territory in Washington State during each month who have transferred a line from a Qwest switch to a CLEC facility as a part of Qwest's current hot cut process. Please count only those employees who perform the manual process.

BENCH REQUEST NO. 21:

Please provide the average Qwest personnel time in Qwest's service territory in Washington State attributable to a single cutover on a single order, separated between each type or classification of cutover provided by Qwest, including, but not limited to, "coordinated installation with cooperative testing," "coordinated testing without cooperative testing," "frame due time" or "project coordinated installation" cutovers.

BENCH REQUEST NO. 22:

Please provide the average Qwest personnel time in Qwest's service territory in Washington State attributable to multiple cutovers contained on a single order, separated between each type or classification of cutover provided by Qwest, including, but not limited to, "coordinated installation with cooperative testing," "coordinated installation without cooperative testing," "frame due time" or "project coordinated installation" cutovers.

BENCH REQUEST NO. 23:

Please provide a list of Qwest wire centers in Washington State with indicators that identify whether the office is unstaffed, has a technician on duty but the technician can not perform hot cuts, or has a technician on duty and the technician can perform hot cuts. For unstaffed offices and offices where a technician can not perform hot cuts, please specify the number of miles that the technician who can perform hot cuts must drive and the driving time to reach that office from the closest office where the technician who can perform hot cuts is normally on duty.

BENCH REQUEST NO. 24:

Please identify whether Qwest has a “project-based” hot cut process for moving UNE-P customers to UNE-L? If so, please describe the process in detail, produce all documents describing the process, identify the standard intervals and indicate the per unbundled loop charges for the process.

BENCH REQUEST NO. 25:

If the response to Bench Request No. 24 states that Qwest has a “project-based” hot cut process for moving UNE-P customers to UNE-L, please identify whether the “project-based” process been subjected to testing, third party or otherwise. If so, please provide the detailed results of such testing, including all documentation of the methodology that substantiates the statistical and operational validity of such testing.

BENCH REQUEST NO. 26:

If the response to Bench Request No. 24 states that Qwest has a “project-based” hot cut process for moving UNE-P customers to UNE-L, please identify whether it is possible to increase the current capacity of the UNE-P to UNE-L “project-based” process. If so, please describe how the capacity may be increased. Please describe any current plans Qwest has to increase the current capacity.

BENCH REQUEST NO. 27:

Please identify whether Qwest has in place a single LSR process to migrate UNE loops from Qwest to CLEC, CLEC to Qwest, and CLEC to CLEC for each of the following?

- (a) Voice service.
- (b) Data service.
- (c) Voice and data service

BENCH REQUEST NO. 28:

If your response to Bench Request No. 27 states that Qwest has a single LSR process to migrate UNE loops, please state whether the process provides flow through capability, and provide:

- (a) The capacity of each process in terms of number of UNE loops per day that can be migrated.
- (b) The percentage of the service orders that flow through to completion.

BENCH REQUEST NO. 29:

If your response to Bench Request No. 27 states that Qwest has a single LSR process to migrate UNE loops, please identify whether Qwest has plans to increase its capacity to perform single LSR migrations. If so, please provide the planned capacity for each type of migration and service.

BENCH REQUEST NO. 30:

If a batch cut process is developed, does that make it more or less likely that an electronic loop provisioning process will be implemented?

BENCH REQUEST NO. 31:

Please identify and provide documentation of any process or performance complaints from CLECs regarding Qwest's hot cut procedures and any internal analysis of potential improvements to Qwest's current hot cut process, including any description of planned improvements to the process, and the dates by which such improvements are to be implemented.

B. QUESTIONS FOR PARTIES OTHER THAN QWEST:

BENCH REQUEST NO. 32:

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

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.

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.

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.

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.

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.

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.

Please respond to these Bench Requests no later than Monday, **November 3, 2003**, with an original and five copies. Please provide a copy of your responses to all parties in this proceeding electronically, as well as by mail where the party has requested service by mail. If you have any questions concerning these requests, please contact Paula Strain at 360-664-1278.

Sincerely,

ANN E. RENDAHL
Administrative Law Judge