

Exhibit No. \_\_\_\_ (JL-7)  
Docket UT-121994  
Witness: Jing Liu

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of Frontier  
Communications Northwest, Inc.'s  
Petition to be Regulated as a Competitive  
Telecommunications Company Pursuant  
to RCW 80.26.320**

**DOCKET UT-121994**

**EXHIBIT TO  
TESTIMONY OF**

**Jing Liu**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*tw telecom's Response to Frontier Data Request Nos. 26 and 27:  
Residential Customer Information*

**April 25, 2013**

Washington Utilities and Transportation Commission  
Docket UT-121994

**tw telecom of washington llc's** Objections to Data Requests 1-50 from Frontier  
Prepared by Davis Wright Tremaine LLP, counsel for tw telecom of washington llc

**FRONTIER DATA REQUEST NO. 26:**

**Re: Residential Consumer Information**

Identify the number and provide a list of each residential consumer subscribing to a Telecommunications Service or VoIP service that is or was a customer of tw telecom, and/or any Affiliate of tw telecom that provides any of the Services in Washington, since January 1, 2011, in Frontier's service territory in Washington. To the extent tw telecom, and/or any Affiliate of tw telecom that provides any of the Services in Washington, maintains data differentiating residential customers by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and quantify the number of customers and equivalent service lines for each geographic subdivision. In addition, for each customer identified in this response, differentiate and identify the number of customers and equivalent service lines that tw telecom and/or any Affiliate of tw telecom that provides any of the Services in Washington provides services using: (i) tw telecom's or an Affiliate's network and facilities up to interconnection with the public network; (ii) other than Frontier, a third party's network and facilities up to interconnection with the public network; (iii) Frontier provided unbundled network elements; (iv) Frontier resold services; and (v) other Frontier provided services.

**OBJECTIONS:** tw objects to this request on the basis that the identities of customers, as well as the quantity of services provided is irrelevant and not reasonably calculated to lead to discovery of admissible evidence.

tw further objects to the definition of "Services" as overbroad, unduly burdensome, irrelevant and not reasonably calculated to lead to admissible evidence because the definition encompasses services (including without limitation "Internet access service," "video services," and "cable TV") that do not compete with the regulated services for which Frontier's petition seeks competitive classification.

tw further objects to the request to the extent that it would require a special study to provide the information requested.

**RESPONSE:**

Subject to and without waiving the general and specific objections set forth herein, tw responds as follows:

tw does not provide service to residential customers.

Washington Utilities and Transportation Commission  
Docket UT-121994

**tw telecom of washington llc's** Objections to Data Requests 1-50 from Frontier  
Prepared by Davis Wright Tremaine LLP, counsel for tw telecom of washington llc

**FRONTIER DATA REQUEST NO. 27:**

**Re: Residential Consumer Information**

Identify the number and provide a list of each residential consumer and equivalent service lines subscribing to a voice or VoIP service that is or was customer of tw telecom and/or any Affiliate of tw telecom that provides any of the Services in Washington, since January 1, 2011, that tw telecom, and/or any Affiliate of tw telecom that provides any of the Services in Washington, knows or has reason to know was previously a customer of Frontier in Washington. To the extent tw telecom, and/or any Affiliate of tw telecom that provides any of the Services in Washington, maintains data differentiating residential customers by any type of geographic subdivisions, including city, county, ILEC wire center, business operating area, or other political subdivision in the State of Washington, separately identify and list the residential customers and quantify the number of equivalent service lines for each geographic subdivision.

**OBJECTIONS:** tw objects to this request on the basis that the identities of customers, as well as the quantity of services provided is irrelevant and not reasonably calculated to lead to discovery of admissible evidence.

tw further objects to the definition of "Services" as overbroad, unduly burdensome, irrelevant and not reasonably calculated to lead to admissible evidence because the definition encompasses services (including without limitation "Internet access service," "video services," and "cable TV") that do not compete with the regulated services for which Frontier's petition seeks competitive classification.

**RESPONSE:**

Subject to and without waiving the general and specific objections set forth herein, tw responds as follows:

tw does not provide service to residential customers.