

[Service Date October 22, 2003]

October 22, 2003

**NOTICE OF ISSUANCE OF COMMISSION BENCH REQUESTS 39-70
(Due on Monday, November 17, 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.

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

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 party that provided it, or at the option of the providing party, 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 allows 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 responses to the Records Center at records@wutc.wa.gov.

A. QUESTIONS TO PARTIES OTHER THAN QWEST:**BENCH REQUEST NO. 39:**

Please provide a list of all switches that you currently use, or those that you have used, or that you could use to provide a qualifying service (as defined in 47 C.F.R. § 51.5, as that section will be amended by the Final Rules issued by the FCC pursuant to the Triennial Review Order) anywhere in Washington state, regardless of whether the switch itself is located in the state. For each switch listed in response to this bench request, please provide the:

- (a) Physical location of each switch (*i.e.*, the street address);
- (b) The 11-digit Common Language Location Identifier (CLLI) code of the switch as it appears in the Local Exchange Routing Guide (LERG) for Washington state; and
- (c) The LATA served by each switch.

BENCH REQUEST NO. 40:

For each of the switches identified in your response to Bench Request No. 39, please state whether you own the switch, lease the switching capacity, use the switch on an unbundled or resale basis, or otherwise have obtained the right to use the switch on some non-ownership basis. If you do not own the facility, please identify (a) the entity owning the switch and, if different than the owner of the switch, the entity with which you have entered into the lease or other arrangement, (b) the nature of the arrangement, and (c) whether the entity or entities are affiliates of yours, in the sense defined in paragraph 408, footnote 1263, of the Triennial Review Order.

BENCH REQUEST NO. 41:

Please identify whether the information in the Local Exchange Routing Guide (LERG) for Washington state is current and accurate for the switches that you listed in response to Bench Request No. 39. If any of the information is not accurate, please identify the inaccurate information and provide corrected information, including any additions, deletions or changes. As part of your review of the information in the LERG, please state whether the CLLI code is accurate for each switch that you identified in response to Bench Request No. 39. In addition, please state whether the LERG definition of the function of each switch (*i.e.*, tandem, end office, etc.) is accurate.

BENCH REQUEST NO. 42:

For each switch listed in response to Bench Request No. 39, **excluding Qwest switches that you use on an unbundled basis in Qwest's service territory in Washington state or through the resale of Qwest's services at wholesale rates**, please provide:

- (a) The vertical and horizontal ("V&H") coordinates of the switch from the LERG;
- (b) The switch type (*e.g.*, Lucent 5ESS),
- (c) The function of the switch (*e.g.*, stand-alone, host, or remote);
- (d) The switch capacity (*i.e.*, the maximum number of voice-grade equivalent lines it is capable of serving);
- (e) The geographic area over which you provide qualifying service to end-user customers with the switch;
- (f) The initial cost of the switch, including installation and engineering costs; and
- (g) The number of initially equipped lines.

BENCH REQUEST NO. 43:

For each switch identified in your response to Bench Request No. 42, please provide a list of all the Qwest wire centers in Washington state, identified by name, address, and CLLI code, for which you are currently using that switch to provide qualifying service to any end user customers.

BENCH REQUEST NO. 44:

For each Qwest wire center identified in response to Bench Request No. 43, please identify the total number of voice-grade equivalent lines that you are providing to customers in that wire center from each switch identified in response to Bench Request No. 42. For purposes of this question, "voice-grade equivalent lines" should be defined consistently with the FCC's use of the term. See, e.g., *FCC Form 477, Instructions for the Local Competition and Broadband Reporting Form*.

BENCH REQUEST NO. 45:

With respect to the voice-grade equivalent lines identified in your response to Bench Request No. 44, please separately indicate the number being provided to (a) residential customers; (b) business customers to whom you provide between 1-3 voice-grade equivalent lines at one location; (c) business customers to whom you provide between 4-24 voice-grade equivalent lines at one location; and (d) business customers to whom you provide 25 or more voice-grade equivalent lines (in one location).

BENCH REQUEST NO. 46:

With respect to the lines identified in your response to Bench Request No. 44, please provide, beginning with January 1, 2003, the average total monthly revenues earned per line served in Washington state by LATA, MSA, and wire center, and specify the source of those revenues by service type. The average total monthly revenue per line should include revenues associated with the basic retail price charged to the customer, vertical features, universal service payments, interstate access charges, intrastate access charges, subscriber line charges, toll, long distance, local number portability, data, service to Internet service providers, and line revenues derived from any other sources. Please provide any available breakdowns of each revenue component that is part of the average total revenue per line, identifying the type and amount of the revenue. Please identify any differences between types of customers served.

BENCH REQUEST NO. 47:

With respect to the lines identified in your response to Bench Request No. 44, please provide, beginning with January 1, 2003, the average total monthly cost incurred per line served in Washington State by LATA, MSA, and wire center, and specify the source of those costs by service type. These costs should include costs associated with switching; loops; collocation; transport; hot cuts; OSS; signaling; customer acquisitions; backhauling traffic to your switches; maintenance, operations, and other administrative activities; and capital costs. Please provide any available breakdowns of each cost component that is part of the average total cost per line, identifying the type and amount of each cost. Please identify any cost differences between types of customers served.

BENCH REQUEST NO. 48:

Please state whether you are providing, or have plans to provide, through a wholesale, lease, or resale arrangement, capacity on any switches you own or operate in Washington state, or that you own or operate in another state and that you use to provide a qualifying service in Washington state, to another carrier for use in providing qualifying services anywhere in Washington state. For each switch you identify in response to this bench request, please identify:

- (a) The CLLI code for the switch;
- (b) The make, model, age, and current software upgrades of the switch;
- (c) The geographic location of the switch;
- (d) The geographic area served by the switch; including a list of all exchanges served by the switch;
- (e) The features and functions (including software upgrades) available in the switch;
- (f) The capacity of the switch, including:
 - (i) Percentage of switch capacity in use;
 - (ii) Percentage of switch capacity reserved for your own use and future use; and
 - (iii) Percentage of current and future capacity of the switch that will be made available for CLEC use.
- (g) For each switch identified, please state in detail:
 - (iv) The anticipated service life of each switch;
 - (v) Whether you intend to use the switch for the full anticipated service life.

- (h) The rates, terms, and conditions under which you are making the switch capacity available;
- (i) The identity of the other carrier, whether you are affiliated with the other carrier, and if you are affiliated, the nature of the affiliation.

BENCH REQUEST NO. 49:

For each month beginning with January 1, 2003, please identify the monthly churn rate you have experienced in providing qualifying services to end user customers in Washington state. In answering this bench request, you should calculate the churn rate as the number of voice grade equivalent lines lost each month divided by the average number of voice grade equivalent lines in service each month. In calculating the churn rate, do not include customers who move but remain your customer.

BENCH REQUEST NO. 50:

Please provide a list of all transport facilities (*i.e.*, trunks) in Washington state between any two Qwest central offices, or between a Qwest central office and non-Qwest facilities, that you own, control, or lease or have obtained use of from an entity other than Qwest. For each such facility, please identify:

- (a) The A (beginning) location, the Z (ending) location, and any other premises through which the facility is routed;
- (b) The wire center in which the facility is located, by CLLI code (if wire center data is unavailable, please report the data by city);
- (c) The type of transport facility (*i.e.*, DS0, DS1, DS3, dark fiber);
- (d) The transport technology used (*e.g.*, fiber optic (dark or lit), microwave, radio, or coaxial cable);
- (e) The level of capacity the facility is capable of supporting;
- (f) Whether you own the facility, lease or purchase transmission capacity on the facility, use the facility on an unbundled basis, or have obtained the use of the switch on some other non-ownership basis, and if you do not own the facility, please identify the nature of the arrangement and the name of the entity owning the facility; and
- (g) The number of facilities you own, control, lease, or have use of along the same A to Z route you identify in section (a) above.

BENCH REQUEST NO. 51:

Please provide a list of all the Qwest wire centers in Washington state, identified by name, address, and CLLI code, to which you provide or offer transport facilities (*i.e.*, any facilities that, directly or indirectly, provide connections to wire centers) to other carriers. For each such facility, please identify:

- (a) The type of transport facility (*i.e.*, DS0, DS1, DS3, dark fiber);
- (b) The transport technology used (*e.g.*, fiber optic (dark or lit), microwave, radio, or coaxial cable);
- (c) The level of capacity the facility is capable of supporting;
and
- (d) The names of the other carriers.

BENCH REQUEST NO. 52:

For each transport facility identified in your response to Bench Request No. 50 that you have deployed yourself or have obtained from a supplier other than Qwest, please identify the cost of the facility, including the installation cost for any facilities that you have deployed yourself, and the rates, terms, and conditions of any transport facilities that you obtain through a wholesale, lease, or resale arrangement from any entity other than Qwest.

BENCH REQUEST NO. 53:

Please identify the points within Washington state and the location (by street address and/or V & H coordinates) at which you connect your local network facilities to the networks of carriers other than Qwest, including interconnection with other CLECs, interexchange carriers, or internet service providers at any point of presence (POP), network access point (NAP), collocation hotel, data center, or similar facility.

BENCH REQUEST NO. 54:

Please provide a list of all fiber rings in Washington state that you own or control and identify the location (by street address and/or V&H coordinates) of each add-drop multiplexer or comparable facility for connecting other transport facilities (*e.g.*, wire centers, loops, other fiber rings) to the fiber ring.

BENCH REQUEST NO. 55:

Please identify whether you are affiliated with Qwest in any way or with any other carrier (including intermodal providers) that serves the transport routes or connection points identified in response to Bench Request Nos. 50 and 53. If so, please describe the affiliation.

BENCH REQUEST NO. 56:

Please identify whether you have any long-term (10 or more years) dark fiber Indefeasible Rights of Use (IRUs) between any two Qwest wire centers or other facilities in the same LATA in Washington state, in which you maintain an active physical collocation arrangement.

BENCH REQUEST NO. 57:

If you have identified any long-term dark fiber IRUs in your answer to Bench Request No. 56, please identify for each pair of wire centers or other locations:

- a. The common name, address and CLLI code for each pair of wire centers or other locations;
- b. The number of dark fiber pairs terminating at each of the physical collocation facilities;
- c. Whether you have attached optronics to the dark fiber, and if so, the transmission level of each such lit circuit; and
- d. The term of the IRU.

BENCH REQUEST NO. 58:

Please provide a list of all recurring and non-recurring rate elements and rates that apply when a CLEC purchases UNE-L and special access, EEL, DS1, DS3, or dark fiber transport from a Qwest rate center to a CLEC rate center.

BENCH REQUEST NO. 59:

For each Qwest wire center in which you have a collocation arrangement, please identify:

- (a) The name, address, and CLLI code of the wire center;

- (b) The number of collocation arrangements for each wire center identified;
- (c) The type of collocation (*e.g.*, caged, cageless, shared or virtual);
- (d) The type of equipment and the number of equivalent DS0 channels for all services in each collocation space (*e.g.*, DLC, remote switches, multiplexers, transmission terminals, etc.);
- (e) The types of services provided using such an arrangement (*e.g.*, qualifying services, broadband, internet access);
- (f) The cost and capacity of each item of equipment identified above;
- (g) The transmission facilities and the number of equivalent DS0 channels for all services used to connect the wire center to your switch or non-Qwest switching provider;
- (h) The type of termination equipment used in the collocation arrangement;
- (i) The amount of unused or excess space in each collocation space; and
- (j) The approximate number of days between the date the collocation space was turned over to you and the date equipment in the collocation space was first used to provide local service. If the collocation space has not been used to provide local service, or was so used in the past but is not now, so state and provide the date, if any, on which you intend to use the space to provide local service.

BENCH REQUEST NO. 60:

For each shared or non-Qwest location (*e.g.*, collocation hotels) in which you are located, please state:

- (a) The name address, or CLLI code (if applicable) of the shared or non-Qwest location;
- (b) The type of collocation or sharing/leasing of space for placement of equipment (*e.g.*, caged, cageless, shared or virtual);
- (c) The type of equipment and the number of equivalent DS0 channels for all services in the collocation space (*e.g.*, DLC, remote switches, multiplexers, transmission terminals, etc.);

- (d) The types of services provided using such an arrangement (e.g., qualifying services, broadband, internet access);
- (e) The cost and capacity of each item of equipment identified above; and
- (f) The transmission facilities and the number of equivalent DS0 channels for all services used to connect the office to your switch or non-Qwest switching provider.

BENCH REQUEST NO. 61:

Please provide a list of all Qwest wire centers in Washington state, identified by name, address, and CLLI code, at which you connect a collocation arrangement to a facility or collocation arrangement belonging to another carrier, and for each connection, identify the carrier and the capacity or type of connection.

BENCH REQUEST NO. 62:

Please provide a list of all Qwest wire centers in Washington state, identified by name, address and CLLI code, at which you were denied the ability to connect a collocation arrangement to a collocation arrangement or facility belonging to another carrier.

B. QUESTIONS FOR QWEST**BENCH REQUEST NO. 63:**

Please identify any and all purposes for which Qwest uses each of the following differentiations for operational, economic, or marketing purposes: (1) LATA, (2) wire center, (3) MSA, (4) deaveraged rate zone, (5) entire state, (6) entire service area, and (7) any other level of differentiation Qwest uses (please specify).

BENCH REQUEST NO. 64:

Please provide separately for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the total number of business voice-grade equivalent lines served, as well as the number of business voice-grade equivalent lines that:

- (a) Qwest directly serves;
- (b) CLECs are serving through UNE-L;
- (c) CLECs are serving through UNE-P; and

- (d) CLECS are serving through resale.

BENCH REQUEST NO. 65:

Please provide separately for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the number of residential voice-grade equivalent lines served, as well as the number of residential voice-grade equivalent lines that:

- (a) Qwest directly serves;
- (b) CLECs are serving through UNE-L;
- (c) CLECs are serving through UNE-P; and
- (d) CLECS are serving through resale.

BENCH REQUEST NO. 66:

For the most recent quarter for which such information is available, please provide for each Qwest end-office switch, by applicable CLLI code, the CLLI code of each tandem switch on which the end-office switch homes.

BENCH REQUEST NO. 67:

Please identify each Qwest wire center in Washington state, identified by name, address, and CLLI code, that does not have fiber connectivity for purposes of interoffice transport.

BENCH REQUEST NO. 68:

Please provide, for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the number of in-service collocation arrangements that you have in place. For each such collocation arrangement, please identify the carrier to whom you have sold or with whom you have made these collocation arrangements, and the type of collocation that you are providing.

BENCH REQUEST NO. 69:

Please provide, for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the number of provisioned collocation arrangements that you have in place that have yet to be activated, and for each such collocation arrangement, please identify the carrier to whom you have provided these collocation arrangements, and the type of collocation.

BENCH REQUEST NO. 70:

Please provide, for each Qwest wire center in Washington state, identified by name, address, and CLLI code, the number of pending collocation arrangements. For each such collocation arrangement, please identify the carrier to whom you have provided these collocation arrangements, and the type of collocation arrangement.

Please respond to these bench requests no later than Monday, **November 17, 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 Administrative Law Judge Ann Rendahl at 360-664-1144, or at arendahl@wutc.wa.gov.

Sincerely,

ANN E. RENDAHL
Administrative Law Judge