

QWEST CORPORATION
STATE: Washington
DOCKET NO: UT-030614
CASE DESCRIPTION: Request for Competitive Classification of Basic Business
Exchange Telecommunications Services
INTERVENOR: Public Counsel
REQUEST NO: PC 03-024S1

REQUEST:

Re Qwest's response to MCI 01-003, Confidential Attachment A and B. (Note - this question refers to confidential attachments but the question does not include confidential attachment).

See also Qwest's "Quarterly Report" dated February 19, 2003 for the fourth quarter, 2002 (located at www.qwest.com), page 13, Attachment E, footnote 1 which states that "a voice-grade equivalent is the amount of capacity required to carry one telephone call" and further states that a "voice-grade equivalent is the outcome of measuring all residential and business access lines, and private line channel terminations as if they were converted to single access lines that have the ability to transmit and receive only one voice transmission at a time."

- a) Using the same definition as is used in Qwest's "Quarterly Report," quoted above, please provide the total voice grade equivalent access lines for business customers (i.e., exclude "consumer") for Qwest in Washington for each of the years 1999 through 2002 (i.e. data that are analogous to the data shown for Qwest's entire region on page 13 of Qwest's 'Quarterly Report'). Include any and all assumptions and workpapers used in providing the response.
- b) Please describe circumstances in which Qwest's private lines can be a substitute for Qwest's business access lines.
- c) Separately for each of the years 1999 through 2002, indicate the quantities of voice grade equivalent access lines provided to business customers that are associated with private lines.

RESPONSE:

Qwest objects to this data request on the grounds that it is overly broad and unduly burdensome. Without waiving these objections, Qwest is in the process of gathering the information necessary to respond to subparts a, b, and c and will supplement its response when it completes its review and analysis of this information.

Respondent: Lisa Espinosa

SUPPLEMENTAL RESPONSE dated August 12, 2003:

- a. Qwest continues to object to this discovery request on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and that it is overly broad and unduly burdensome.

Voice grade equivalent access lines consist of retail, resale and official services as well as product categories which are not subject to this petition (see Attachment A, page 2). Additionally, Qwest has no information that these voice grade equivalent access lines are used to provide exchange services. In other words, the count of total voice grade equivalent access lines is merely a way to measure the capacity of services sold by Qwest using a common unit of measurement. Without waiving these objections, Qwest submits Confidential Attachment A which provides the total voice grade equivalent access lines for business customers, as consistent with those quantities provided in the "Quarterly Report" referenced, for the years 1999, 2000, 2001 and 2002.

b. Qwest is unable to describe every known circumstance where private lines can substitute for business access lines and services using private lines. Some circumstances where private lines can substitute for business access lines include, but are not limited to, those instances where the customer has equipment that allows for the use of private lines in the provision of their exchange services, and it makes economic sense to provision exchange services using a private line facility.

c. Qwest objects to this request on the grounds that it is overly broad, unduly burdensome, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Qwest responds as follows: By this question, Qwest does not know whether Public Counsel is seeking quantities of voice grade access lines provided to business customers as exchange-type services only, or for any intended purpose. Notwithstanding this uncertainty, Qwest is unable to provide the data requested. Qwest would need to individually pull the records for the business equivalent access lines provided in (a) above and manually compare each record to identify which might be associated with private lines.

Respondent: Lisa Espinosa