## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

QWEST CORPORATION

For Competitive Classification of Basic Business Exchange Telecommunications Services DOCKET NO. UT-030614

COMMISSION STAFF MOTION REQUESTING THE COMMISSION ORDER CLECS TO PRODUCE INFORMATION

## I. INTRODUCTION

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Commission Staff files this motion pursuant to WAC 480-09-420(8) requesting that the Washington Utilities and Transportation Commission (Commission) order Competitive Local Exchange Carriers (CLECs) to produce information the Commission requires to determine whether Qwest's basic business services are competitive in Washington. Due to the condensed schedule of this proceeding and the analysis required once the information is received, Staff requests expedited treatment of this motion.

## II. MOTION

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Pursuant to RCW 80.36.330(1), the Commission may classify a telecommunications service provided by a telecommunications company as competitive if the service is subject to effective competition. The statute defines "effective competition" to mean that customers have reasonably available alternatives and that service is not provided to a significant captive customer

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base. RCW 80.36.330(1). Telecommunications companies are required to provide the Commission with the data the Commission deems necessary to determine whether competitive classification is warranted. RCW 80.36.330(5).

Qwest filed a petition for competitive classification of its basic business exchange services in Washington pursuant to RCW 80.36.330. In order to evaluate the petition, the Commission requires information from CLECs operating in Washington.

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Commission Staff requests that the Commission issue an order requiring each CLEC operating in Washington to provide the following information:

- 1. If your company offers basic business telecommunications, PBX, or centrex service in less than the entire state of Washington, please describe the geographic area in which your company offers such service, or plans to offer such service in the state of Washington within the coming 12 months.
- 2. For each Qwest wire center in Washington and for each type of telecommunications service that your company provides to business customers (basic business exchange telecommunications, PBX, centrex service) please provide the number of lines your company provided to business customers as of December 31, 2002. Please provide separate totals for those lines provided through (a) resale of Qwest service, (b) unbundled network element loops, (c) combinations of network elements such as UNE-P, and (d) facilities owned by your company.
- 3. For each Qwest wire center in Washington and for each type of telecommunications service that your company provides to business customers (basic business exchange telecommunications, PBX, centrex service) provide the total number of business customer locations your company served as of December 31, 2002. Please provide separate totals for those locations served through (a) resale of Qwest service, (b) unbundled network element loops, (c) combinations of network elements such as UNE-P, and (d) facilities owned by your company.

Commission Staff further requests that the CLECs be required to provide the data by July 11, 2003.

Respectfully submitted, this \_\_\_\_ day of June, 2003.

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