

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	
)	
QWEST CORPORATION)	DOCKET NO. UT-033044
)	
To Initiate a Mass-Market Switching)	AT&T's Response to Bench
And Dedicated Transport Case)	Requests Nos. 32 - 62
Pursuant to the Triennial Review)	
Order)	

REDACTED VERSION

AT&T Communications of the Pacific Northwest, Inc., and AT&T Local Services on behalf of TCG Seattle and TGC Oregon (collectively "AT&T") hereby submit the public objections and responses to Bench Requests Nos. 32 - 62 issued by Administrative Law Judge ("ALJ") Ann E. Rendahl on October 22, 2003.

GENERAL OBJECTIONS

1. AT&T objects to each and every Bench Request as unduly burdensome to the extent it requests information in a form or of a nature not retained by AT&T in the ordinary course of business and, therefore, requests information that cannot be provided without completing a special study or analysis.
2. AT&T further objects to each and every Bench Request to the extent it seeks information that is protected by the attorney-client privilege or any other valid privilege existing within the State of Washington.

RESPONSES

BENCH REQUEST NO. 32:

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

RESPONSE TO BENCH REQUEST NO. 32

Reserving and without waiving the General Objections above, see **Attachment A**, Hot Cut Process Diagram And Task List.

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 33:

AT&T objects to Bench Request No. 33 as set forth in the General Objections above and also to the extent it calls for speculation as to matters outside of AT&T's direct knowledge, namely processes and tasks that are performed or may be performed in the future by Qwest and the costs associated with those activities. AT&T further objects to Bench Request No. 33 to the extent it requests information not reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, Bench Request No. 33 is designed in part to elicit information about AT&T's specific costs. This information is not relevant to this proceeding because the Federal Communications Commission ordered the state commissions to base their impairment analyses on the forward looking costs of a hypothetical, efficient competitive provider, not the historic costs of any one particular provider. *See e.g.* TRO ¶ 517. Finally, AT&T objects to Bench Request No. 33 as vague and ambiguous to the extent it uses phrases such as "average time it takes to complete the task" and "the typical occurrence of the task" that are not defined and could be interpreted various ways.

Reserving and without waiving these objections please generally see AT&T's response to Bench Request 32. Further,

- a. AT&T does not have information on the average time it takes Qwest to complete the tasks identified in the attached Hot Cut Process Diagram And Task List (attached to Request No. 32).
- b. AT&T does not have information on the typical occurrence of the tasks identified in the attached Hot Cut Process Diagram And Task List (attached to Request No. 32).
- c. AT&T does not have information on the current labor rates Qwest incurs in completing the tasks identified in the attached Hot Cut Process Diagram And Task List (attached to Request No. 32).

- d. In Washington, WUTC Docket UT-023003, Qwest indicated that it has a common overhead (the 67XX accounts, Executive and Planning, General and Administrative) factor of 13.285%, which is applied to both recurring and nonrecurring costs. They also have a factor for support assets, which includes things like land and buildings, furniture and artwork, computers, vehicles, and work equipment. This factor is 17.104% and is applied before the common factor. AT&T assumes that both of these factors would be applied to the hot cut process.

Finally, AT&T is continuing to analyze these issues. To the extent further responsive information is discovered or developed, AT&T will supplement this response or provide such responsive information in its prefiled testimony and exhibits, but AT&T is not in a position to provide further responsive information at this time.

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

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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.

RESPONSE TO BENCH REQUEST NO. 34:

See **Attachment B**, AT&T's Comments And Counter Proposal On Qwest's Batch Hot Cut Proposal. Further, AT&T is currently actively participating in workshops with Qwest and other CLECs on this issue and continues to analyze this issue. To the extent further responsive information is discovered or developed, AT&T will supplement this response or provide such responsive information in its prefiled testimony and exhibits, but AT&T is not in a position to provide further responsive information at this time.

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

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BENCH REQUEST NO. 35:

Please list each task that is part of the batch cut process described in your response to Bench Request No. 34, 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.

RESPONSE TO BENCH REQUEST NO. 35:

See AT&T's response to Bench Request 34.

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

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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.

RESPONSE TO BENCH REQUEST NO. 36:

AT&T objects to Bench Request No. 36 as set forth in the General Objections above and on the basis that it requests information not reasonably calculated to lead to the discovery of relevant and admissible evidence.

Reserving and without waiving these objections, see AT&T's response to Bench Request No. 34. Further, Qwest's non-recurring charges for hot cuts in Washington are as follows:

2 and 4-Wire Analog, Non-Loaded, Coordinated Installation with Cooperative Testing/Project Coordinated Installation (25 or more DS0 Unbundled Loops)

First Loop	Installation or Change, Manual	\$171.07
First Loop	Installation or Change, Mechanized	\$162.81
Each Additional Loop	Installation or Change, Manual	\$119.35
Each Additional Loop	Installation or Change, Mechanized	\$85.03

2 and 4-Wire Analog, Non-Loaded, Coordinated Installation without Cooperative Testing/Project Coordinated Installation (25 or more DS0 Unbundled Loops)

First Loop	Installation	\$59.81
Each Additional Loop	Installation	\$52.32

Date Prepared: November 24, 2003.
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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.

RESPONSE TO BENCH REQUEST NO. 37:

AT&T objects to Bench Request No. 36 as set forth in the General Objections above and to the extent it calls for speculation as to things outside AT&T's direct knowledge, events that may or may not occur in the future, forecasts regarding the future, plans regarding the future, or the implications or ramifications of events that may or may not occur in the future.

Further, AT&T is currently actively participating in workshops with Qwest and other CLECs on this issue and continues to analyze this issue. To the extent further responsive information is discovered or developed, AT&T will supplement this response or provide such responsive information in its prefiled testimony and exhibits, but AT&T is not in a position to provide further responsive information at this time.

Reserving and without waiving these objections, AT&T states that it is difficult to provide any definitive estimate concerning the applicable volumes because no one knows for certain how the local exchange market will react to a post-TRO environment. For a CLEC that served mass-market customers using UNE-P, the number of hot cuts performed in Washington could be thousands or tens of thousands per month. However, in addition to the volumes identified above, the process must also account for churn and should consider the impact of "winbacks" and slamming in a batch migration process, i.e., the potential for slamming allegations where a customer conversion is in the batch conversion queue.

Date Prepared: November 24, 2003.

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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.

RESPONSE TO BENCH REQUEST NO. 38:

Reserving and without waiving the General Objections set forth above, AT&T states that the volume of hot cuts performed by Qwest for AT&T in Washington since January 1, 2003 has been too low to reach any meaningful conclusions. In the state of Washington, from January 1, 2003 until September 31, 2003, Qwest has only performed [CONFIDENTIAL INFORMATION REDACTED] hot cuts. Even if those volumes were significant, Qwest's historical hot cut performance in Washington is not a relevant inquiry. Because the use of UNE-L has been relatively limited, the WUTC should not rely on Qwest's performance results under these measures as an indication of what Qwest's performance would be if unbundled switching were no longer available. As the FCC stated: the number of hot cuts in the current market environment "is not comparable to the number that incumbent LECs would need to perform if unbundled switching were not available for all customer locations served with voice-grade loops." See TRO ¶ 469.

Date Prepared: November 24, 2003.
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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.

RESPONSE TO BENCH REQUEST NO. 39:

See electronically attached **Confidential Attachment C**.

Date Prepared: November 24, 2003.

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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.

RESPONSE TO BENCH REQUEST NO. 40:

See **Confidential Attachment C.**

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 41:

See **Confidential Attachment C.**

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 42:

For subparts (a) – (c), see **Confidential Attachment C**. For subpart (d), reserving and without waiving the General Objections above, see **Confidential Attachment C**. For subpart (e), reserving and without waiving the General Objections above, see AT&T's response to Bench Request No. 43. **[CONFIDENTIAL INFORMATION REDACTED]**

AT&T objects to subparts (f) and (g) as set forth in the General Objections and also to the extent they request information not reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, Bench Request No. 42(f) is designed to elicit information about AT&T's specific costs. This information may not be relevant to this proceeding because the FCC ordered the state commissions to base their impairment analyses on the forward looking costs of a hypothetical, efficient competitive provider, not the historic costs of any one particular provider. *See e.g.* TRO ¶ 517. Given the FCC's Order, to the extent possible, generally applicable and publicly available information should be used to estimate the costs of an efficient CLEC. In this instance, it is inappropriate and unnecessary to solicit AT&T's specific costs.

Reserving and without waiving these objections, AT&T states that it does not have historical records of the initial purchase price or contracts, or of the number of initially equipped lines for those switches that were acquired as a result of mergers with or acquisitions of other carriers. AT&T is not aware that such other companies retained those records in the ordinary course of business. Finally, AT&T does not retain those records on a switch-by-switch basis today.

Date Prepared: November 24, 2003.
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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.

RESPONSE TO BENCH REQUEST NO. 43:

[CONFIDENTIAL INFORMATION REDACTED]

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

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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.*

RESPONSE TO BENCH REQUEST NO. 44:

Reserving and without waiving the General Objections above, see AT&T’s response to Bench Request No. 43.

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

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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).

RESPONSE TO BENCH REQUEST NO. 45:

[Highly Confidential Information Redacted.]

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

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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.

RESPONSE TO BENCH REQUEST NO. 46:

AT&T objects to Bench Request No. 46 as set forth in the General Objections above and as vague and ambiguous with respect to the term “service to Internet service providers.” Further, AT&T objects to Bench Request No. 46 to the extent it requests information not reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, Bench Request No. 46 is designed to elicit information about AT&T’s specific revenues. This information may not be relevant to this proceeding because the FCC ordered the state commissions to base their impairment analyses on the forward looking revenues of a hypothetical, efficient competitive provider, not the historic revenues of any one particular provider. *See e.g.* TRO ¶ 517. Given the FCC’s Order, to the extent possible, generally applicable and publicly available information should be used to estimate the revenues of an efficient CLEC. In this instance, it is inappropriate and unnecessary to solicit AT&T’s specific information.

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

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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.

RESPONSE TO BENCH REQUEST NO. 47:

AT&T objects to Bench Request No. 47 as set forth in the General Objections above and as vague and ambiguous with respect to the term “service to Internet service providers.” Further, AT&T objects to Bench Request No. 47 to the extent it requests information not reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, Bench Request No. 46 is designed to elicit information about AT&T’s specific costs. This information may not be relevant to this proceeding because the FCC ordered the state commissions to base their impairment analyses on the forward looking costs of a hypothetical, efficient competitive provider, not the historic costs of any one particular provider. *See e.g.* TRO ¶ 517. Given the FCC’s Order, to the extent possible, generally applicable and publicly available information should be used to estimate the costs of an efficient CLEC. In this instance, it is inappropriate and unnecessary to solicit AT&T’s specific information.

Date Prepared: November 24, 2003.

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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:
 - (i) The anticipated service life of each switch;
 - (ii) 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; and
- (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.

RESPONSE TO BENCH REQUEST NO. 48:

[HIGHLY CONFIDENTIAL INFORMATION REDACTED]

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 49:

AT&T objects to Bench Request No. 49 as set forth in the General Objections above and also to the extent it requests information not reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, Bench Request No. 47 is designed, in part, to elicit information about AT&T's churn rates. This information is not relevant to this proceeding because the Federal Communications Commission ordered the state commissions to base their impairment analyses on the forward looking churn rates of a hypothetical, efficient competitive provider, not the historic churn rates of any one particular provider. *See e.g.* TRO ¶ 517.

[Highly Confidential Information Redacted.]

Date Prepared: November 24, 2003.
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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.

RESPONSE TO BENCH REQUEST NO. 50:

AT&T objects to Bench Request No. 50 as set forth in the General Objections above and also to the extent it requests information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence. AT&T further objects to Request No. 50 to the extent it requires AT&T to identify the specific geographic location of its network facilities other than its switches that would, therefore, disclose vulnerable spots in its network infrastructure in contravention of the policies expressed in the Homeland Security Act, 6 U.S.C. § 133(a)(1)(E).

[CONFIDENTIAL INFORMATION REDACTED]

Date Prepared: November 24, 2003
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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.

RESPONSE TO BENCH REQUEST NO. 51:

See AT&T's response to Bench Request No. 50.

Date Prepared: November 24, 2003.

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 52:

AT&T objects to Bench Request No. 52 as set forth in the General Objections above and to the extent it requests information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, Bench Request No. 52 is designed to elicit information about AT&T's costs. This information is not relevant to this proceeding because the Federal Communications Commission ordered the state commissions to base their impairment analyses on the forward looking costs of a hypothetical, efficient competitive provider, not the historic costs of any one particular provider. Given the FCC's Order, to the extent possible, generally applicable and publicly available information should be used to estimate the costs of an efficient CLEC. In this instance, it is inappropriate and unnecessary to solicit AT&T's specific information.

Reserving and without waiving these objections, AT&T does not keep records on an individual build, individual project, or individual installation basis. Further, AT&T does not have historical records of the costs for those transport facilities that were acquired as a result of mergers with or acquisitions of other carriers. AT&T is not aware that such other companies retained those records in the ordinary course of business. Never the less, AT&T continues to research this issue in an attempt to provide an average estimate of installation costs and will supplement this response as information becomes available.

Date Prepared: November 24, 2003
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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.

RESPONSE TO BENCH REQUEST NO. 53:

AT&T objects to Bench Request No. 53 as set forth in the General Objections above and as to the extent it requests information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, how and where the networks interconnect is not relevant an impairment analysis of dedicated transport. Whether or not CLECs are impaired without access to dedicated transport as an unbundled network element must be determined on a route-specific basis, where a route is defined as “a connection between wire center or switch ‘A’ and wire center or switch ‘Z.’” *See* TRO ¶ 401. The precise path over which traffic travels between the end points of a route does not affect analysis of that route. *Id.* Thus, the information this request seeks sheds no light on transport impairment over specific routes, and it is therefore not relevant to this proceeding. AT&T further objects to Request No. 53 to the extent it requires AT&T to identify the specific geographic location of its network facilities other than its switches that would, therefore, disclose vulnerable spots in its network infrastructure in contravention of the policies expressed in the Homeland Security Act, 6 U.S.C. § 133(a)(1)(E).

Reserving and without waiving these objections, see **Confidential Attachment L.**

Date Prepared: November 24, 2004
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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.

RESPONSE TO BENCH REQUEST NO. 54:

AT&T objects to Bench Request No. 54 as set forth in the General Objections above and as to the extent it requests information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, how and where the networks interconnect is not relevant an impairment analysis of dedicated transport. Whether or not CLECs are impaired without access to dedicated transport as an unbundled network element must be determined on a route-specific basis, where a route is defined as “a connection between wire center or switch ‘A’ and wire center or switch ‘Z.’” *See* TRO ¶ 401. The precise path over which traffic travels between the end points of a route does not affect analysis of that route. *Id.* Thus, the information this request seeks sheds no light on transport impairment over specific routes, and it is therefore not relevant to this proceeding. AT&T further objects to Request No. 53 to the extent it requires AT&T to identify the specific geographic location of its network facilities other than its switches that would, therefore, disclose vulnerable spots in its network infrastructure in contravention of the policies expressed in the Homeland Security Act, 6 U.S.C. § 133(a)(1)(E).

Reserving and without waiving these objections, see **Confidential Attachment G.**

Date Prepared: November 24, 2003

Prepared by: Thor Nelson

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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.

RESPONSE TO BENCH REQUEST NO. 55:

AT&T is not affiliated with Qwest or any other ILEC that serves a transport route identified in **Confidential Attachment G**.

Date Prepared: November 24, 2003

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 56:

AT&T objects to Bench Request No. 56 as set forth in the General Objections above and to the extent the information it seeks is neither relevant nor is reasonably calculated to lead to relevant and admissible evidence. AT&T identified in **Confidential Attachment G** its self-provisioned transport routes. Whether AT&T self-provisions using facilities it owns in fee simple or pursuant to an IRU is irrelevant and does not provide any additional useful information in this proceeding.

Reserving and without waiving these objections, AT&T states that if and to the extent it uses dark fiber IRUs for transport (i.e., any facilities that, directly or indirectly, provide connections to wire centers and terminate in a collocation facility) in Washington State any such facilities are included in the information in **Confidential Attachment G** and are indicated as self-provisioned facilities or "On-Net." AT&T is in the process of trying to identify and other relevant responsive information.

Date Prepared: November 24, 2003
Prepared by: Thor Nelson
Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 57:

See AT&T's response to Bench Request No. 56.

Date Prepared: November 24, 2003

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 58:

AT&T objects to Bench Request No. 58 as set forth in the General Objections above and also because it is unduly burdensome as the information requested is publicly available from the applicable Qwest tariffs and SGAT.

Date Prepared: November 24, 2003

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 59:

AT&T objects to Bench Request No. 59 as set forth in the General Objections above and to the extent it requests information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence. More particularly, Bench Request No. 59 is designed, in part, to elicit information about AT&T's costs. This information is not relevant to this proceeding because the Federal Communications Commission ordered the state commissions to base their impairment analyses on the forward looking costs of a hypothetical, efficient competitive provider, not the historic costs of any one particular provider. *See e.g.* TRO ¶ 517. Given the FCC's Order, to the extent possible, generally applicable and publicly available information should be used to estimate the costs of an efficient CLEC. In this instance, it is inappropriate and unnecessary to solicit AT&T's specific information.

[CONFIDENTIAL INFORMATION REDACTED]

AT&T is in the process of trying to identify any other relevant responsive information and will supplement this response if and when additional information is available.

Date Prepared: November 24, 2003
Prepared by: Thor Nelson
Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 60:

AT&T objects to Bench Request No. 60 as set forth in the General Objections above and further objects to the extent the Request requests information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence. AT&T has identified the carriers with which it interconnects and the locations of its On-Net and Off-Net collocations. AT&T does not provide dedicated transport to other carriers. The information sought in the Request is simply not relevant to whether or not a transport trigger has been met. Further, to the extent Bench Request No. 60 is designed, in part, to elicit information about AT&T's costs such information is not relevant to this proceeding because the Federal Communications Commission ordered the state commissions to base their impairment analyses on the forward looking costs of a hypothetical, efficient competitive provider, not the historic costs of any one particular provider.

Reserving and without waiving these objections, AT&T does not share collocations or occupy space in "collocation hotels" in Washington State.

Date Prepared: November 24, 2003
Prepared by: Thor Nelson
Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 61:

AT&T objects to Bench Request No. 61 as set forth in the General Objections above and further objects to the extent the Request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence.

Reserving and without waiving these objections AT&T states that there are no such wire centers.

Date Prepared: November 24, 2003

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

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.

RESPONSE TO BENCH REQUEST NO. 62:

AT&T objects to Bench Request No. 62 as set forth in the General Objections above and further objects to the extent the Request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant and admissible evidence.

Reserving and without waiving these objections AT&T states that there are no such wire centers.

Date Prepared: November 24, 2003

Prepared by: Thor Nelson

Telephone Number of Preparer: (303) 290-1601

RESPECTFULLY SUBMITTED this 26th day of November, 2003.

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC., AND AT&T
LOCAL SERVICES ON BEHALF OF TCG
SEATTLE AND TCG OREGON**

By:_____

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