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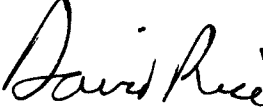
Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, Washington 98504-7250

Subject: Docket No. UT-033044
Responses of Covad Communications Company to Disclosure Request

Dear Ms. Washburn:

Covad Communications Company files the enclosed non-confidential responses pursuant to the Commission's Order No. 3, Order Requiring Disclosure, in the above-referenced docket. As may be applicable, Covad is filing confidential and highly confidential responses pursuant to the protective order, Order No. 2, under separate cover.

Very truly yours,


David L. Rice

cc: All Parties of Record

CERTIFICATE OF SERVICE
Docket No. UT-033044

I hereby certify that a true and correct copy of the foregoing has been sent by first-class U.S. Mail with postage fully prepaid to the following:

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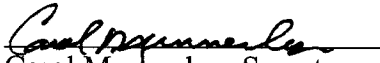
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DATED this 26th day of November, 2003, at Seattle, Washington.


Carol Munmerlyn, Secretary

** Signed confidential protective order on file
Signed highly confidential protective order on file

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

| | | |
|---|---|------------------------------|
| In the Matter of the Petition of |) | DOCKET NO. UT-033044 |
| |) | |
| QWEST CORPORATION |) | |
| |) | |
| To Initiate a Mass-Market Switching and |) | COVAD COMMUNICATIONS |
| Dedicated Transport Case Pursuant to |) | COMPANY'S RESPONSES |
| the Triennial Review Order |) | TO COMMISSION BENCH REQUESTS |
| |) | NOS. 39 - 62 |
| |) | |
| |) | |

Covad Communications Company (“Covad”), hereby files the following Responses to Commission Bench Requests Nos. 39-62, dated October 23, 2003, served upon CLECs by the Washington Utilities and Transportation Commission. Because Covad Communications Company (“Covad”) has already previously responded to CLEC Questions 1-7 (Bench Requests Nos. 32 – 38), it does not replicate those answers in this Response.

GENERAL OBJECTIONS

1. Covad objects to these Bench Requests to the extent they seek to impose an obligation on Covad to respond on behalf of affiliates that are not parties to this case. In addition, such Bench Requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. As a result, Covad will not be responding to Bench Requests that seek information about affiliate companies.

2. Covad objects to these Bench Requests to the extent they are intended to apply to matters other than those subject to the jurisdiction of the Commission. Covad objects to such Bench Requests as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Covad objects to each and every Bench Request to the extent that such Request calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Covad objects to each and every Bench Request insofar as the Request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these Bench Requests. Any answers provided by Covad in response to these Bench Requests will be provided subject to, and without waiver, of the foregoing objection.

5. Covad objects to each and every Bench Request insofar as the Request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Covad will attempt to note in its Responses each instance where this objection applies.

6. Covad objects to providing information to the extent that such information is already in the public record before the Commission.

7. Covad objects to these Bench Requests, instructions and definitions, insofar as they seek to impose obligations on Covad that exceed the requirements of the Washington State Rules of Civil Procedure and Washington State Law.

8. Covad objects to each and every Bench Request, insofar as any of the Requests are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Covad is a large corporation with employees located in many different locations. In the course of its business, Covad creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change

jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these Requests. Covad will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Requests purport to require more, Covad objects on the grounds that compliance would impose an undue burden or expense.

10. Covad objects to each and every Bench Request to the extent that the information requested constitutes “trade secrets.” To the extent that the Washington Utilities and Transportation Commission requests proprietary confidential business information, Covad will make such information available in accordance with the protective order, subject to other general or specific objections contained herein.

11. Covad objects to any Bench Request that seeks to obtain “all” or particular documents, items, or information to the extent that such a Request is overly broad and unduly burdensome. Any answers provided by Covad in response to these Bench Requests will be provided subject to, and without waiver of, the foregoing objection.

**SPECIFIC OBJECTIONS RELATING TO SWITCHES –
BENCH REQUESTS 39 THROUGH 48**

Because Covad does not provide voice services over its ATM switches and because ATM switches are not circuit switches, Bench Requests related to Covad’s ATM switches are irrelevant to both the “triggers” and “potential deployment” analyses in this docket. The Federal Communications Commission (“FCC”) states in its Triennial Review Order (“TRO”) that “[f]or purposes of the examination described here, mass market customers are *analog voice customers ...*” TRO ¶ 497 (emphasis added). In the “triggers” analysis, the FCC repeatedly states that the switches to be considered are *only* those “*actively providing voice service used to serve the mass market.*” TRO ¶ 499 (emphasis added); see also, ¶ 498 (“triggers identify *existing* examples of multiple competitive LECs using their own switches to

serve mass market [*analog voice*] customers . . .”) (emphasis added); ¶ 499 (“the identified competitive switch providers should be *actively providing voice service* to mass market customers . . .”) (emphasis added); ¶ 500 (“we find that states shall not evaluate any other factors The key consideration to be examined by state commissions is whether the providers are *currently* offering and able to provide [*analog voice*] service . . .”) (emphasis added).

Similarly, in the “potential deployment” analysis, the FCC states that “States should first examine whether competitors are already using their own switches *to serve voice customers* . . .” and whether there “are two wholesale providers or three self-provisioners of switching *servicing the voice enterprise market* . . .” TRO ¶ 508 (emphasis added); see also ¶ 507. Covad does not provide a single voice service – to mass markets or enterprise markets – over its ATM switches. While ATM switches may have the potential to support certain kinds of voice over internet protocol (VoIP) services, such nascent technologies are not currently available to serve mass markets. Accordingly, any Bench Request regarding Covad’s ATM switches is irrelevant in this docket.

Moreover, the FCC’s consideration of circuit switches is wholly separate from the FCC’s analysis of ATM switching. Indeed, the FCC’s holdings regarding these two kinds of switches are diametrically opposed: circuit switches serving the mass *voice* market are unbundled while ATM switches serving the mass *data* market are not. *Compare* ¶¶ 459-485 *with* ¶¶ 535-541 (noting that ATM switches are ubiquitous and “are much cheaper to deploy than circuit switches.” ¶ 538). Clearly then, ATM switches and circuit switches are not interchangeable. As such, Bench Requests served on Covad seeking information about Covad’s ATM switches are not reasonably calculated to lead to admissible evidence and are, consequently, irrelevant.

Covad is answering these Questions on behalf of its CLEC operating entity. Angela Andrews (Manager of Network Operations), Mike Boss (Manager of Network Operations), Gregory Wetzel (Vice President of Engineering), Michael Zulevic (Director of External Affairs), Sandra Caron (Manager of Customer Operations), Marie Chang (Manager of Network Operations), John Fogarty (Project Manager), and Frank Di Giovanni (Project Manager) are the Covad Representatives responsible for gathering the information contained in these Responses.

CLEC QUESTION NO. 8 (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.

COVAD'S RESPONSE TO QUESTION 8 (Bench Request No. 39):

Covad references and incorporates herein its above General Objections as well as its Specific Objections Relating to Switches. Subject to and without waiving Covad's objections,

- (a) The physical location of Covad's ATM switches are tabled below:

[Highly confidential information redacted].

- (b) This Request is not applicable to Covad as Covad is not listed in the LERG. Please see above table for the 8-digit CLLI code.
- (c) There are no LATAs served by the switches.

CLEC QUESTION NO. 9 (Bench Request No. 40):

For each of the switches identified in your response to CLEC Question No. 8, 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.

COVAD'S RESPONSE TO QUESTION NO. 9 (Bench Request No. 40):

Covad references and incorporates herein its above General Objections as well as its Specific Objections Relating to Switches. Subject to and without waiving Covad's objections, Covad owns all of its switches.

CLEC QUESTION NO. 10 (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 CLEC Question No. 8. 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 CLEC Question No. 8. In addition, please state whether the LERG definition of the function of each switch (*i.e.*, tandem, end office, etc.) is accurate.

COVAD'S RESPONSE TO QUESTION NO. 10 (Bench Request No. 41):

Covad references and incorporates herein its above General Objections as well as its Specific Objections Relating to Switches. Subject to and without waiving Covad's objections, this Bench Request is not applicable to Covad. Covad is a data provider only and is not listed in the LERG.

CLEC QUESTION NO. 11 (Bench Request No. 42):

For each switch listed in response to CLEC Question No. 8, 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.

COVAD'S RESPONSE TO QUESTION NO. 11 (Bench Request No. 42):

Covad references and incorporates herein its above General Objections as well as its Specific Objections Relating to Switches. Subject to and without waiving Covad's objections,

- (a) Covad is not listed in the LERG.
- (b) All of Covad's switches are Cisco BPX 8600 ATM switches.
- (c) Covad's switches are stand-alone switches.
- (d) Covad's switch capacity is 0 as Covad does not provide voice services.
- (e) Covad considers the geographic area served by a switch to be the limits of the areas served by the attending Central Office and this information is more readily available to the ILEC than it is to Covad.
- (f) See attached Exhibit E. **[Highly confidential information redacted.]**
- (g) Covad is in the process of gathering this information and will supply it upon receipt of the same.

CLEC QUESTION NO. 12 (Bench Request No. 43):

For each switch identified in your response to CLEC Question No. 11, please provide a list of all the Qwest wire centers in Washington State, identified by name, address, and CLI code, for which you are currently using that switch to provide qualifying service to any end user customers.

COVAD'S RESPONSE TO QUESTION NO. 12 (Bench Request No. 43):

Covad references and incorporates herein its above General Objections as well as its Specific Objections Relating to Switches. **[Highly confidential information redacted.]**

CLEC QUESTION NO. 13 (Bench Request No. 44):

For each Qwest wire center identified in response to CLEC Question No. 12, 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 CLEC Question No. 11. 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.*

COVAD'S RESPONSE TO NO. 13 (Bench Request No. 44):

Covad references and incorporates herein its above General Objections as well as its Specific Objections Relating to Switches. Subject to and without waiving Covad's objections, Covad is a data provider only. Covad does not report any type of "voice grade equivalent" lines on Covad's Form 477 filings. Covad only reports broadband lines.

CLEC QUESTION NO. 14 (Bench Request No. 45):

With respect to the voice-grade equivalent lines identified in your response to CLEC Question No. 13, 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).

COVAD'S RESPONSE TO QUESTION NO. 14 (Bench Request No. 45):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, see Response to BR 44.

CLEC QUESTION NO. 15 (Bench Request No. 46):

With respect to the lines identified in your response to CLEC Question No. 13, 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.

COVAD'S RESPONSE TO QUESTION NO. 15 (Bench Request No. 46):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, see Response to BR 44.

CLEC QUESTION NO. 16 (Bench Request No. 47):

With respect to the lines identified in your response to CLEC Question No. 13, 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.

COVAD'S RESPONSE TO QUESTION NO. 16 (Bench Request No. 47):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, see Response to BR 44.

CLEC QUESTION NO. 17 (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.

COVAD'S RESPONSE TO QUESTION NO. 17 (Bench Request No. 48):

Covad references and incorporates herein its above General Objections as well as its Specific Objections Relating to Switches. In addition, Covad objects to this Bench Request as being vague, overbroad, and unduly burdensome. Subject to and without waiving Covad's objections, Covad is not providing and has no plans to provide capacity on any of its ATM switches in Washington.

CLEC QUESTION NO. 18 (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.

COVAD'S RESPONSE TO QUESTION NO. 18 (Bench Request No. 49):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, Covad does not have any information responsive to this Request. Covad does not provide voice service, only data service. Covad's publicly announced churn rate for 3rd Quarter 2003 averaged 3.9%.

CLEC QUESTION NO. 19 (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.

COVAD'S RESPONSE TO QUESTION NO. 19 (Bench Request No. 50):

Covad references and incorporates herein its above General Objections and its Specific Objections Relating to Switches. Subject to and without waiving Covad's objections, Covad is providing the following responsive information (please note that Covad has no fiber in the state of Washington):

- (a) Please see Exhibit B. **[Highly confidential information redacted.]** Covad does not have the information on the intermediary legs available in any type of document.
- (b) See Exhibit B. **[Highly confidential information redacted.]**
- (c) See Exhibit B. **[Highly confidential information redacted.]**
- (d) Coaxial Cable.
- (e) See Exhibit B. **[Highly confidential information redacted.]**
- (f) Covad does not own any facilities; all facilities are leased from the entity(s) identified above at tariffed rates.
- (g) None.

CLEC QUESTION NO. 20 (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.

COVAD'S RESPONSE TO QUESTION NO. 20 (Bench Request No. 51):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, Covad does not provide or offer transport facilities to other carriers.

CLEC QUESTION NO. 21 (Bench Request No. 52):

For each transport facility identified in your response to CLEC Question No. 19 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.

COVAD'S RESPONSE TO QUESTION NO. 21 (Bench Request No. 52):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, please see Exhibit C. **[Highly confidential information redacted.]**

CLEC QUESTION NO. 22 (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.

COVAD'S RESPONSE TO QUESTION NO. 22 (Bench Request No. 53):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, **[highly confidential information redacted.]**

CLEC QUESTION NO. 23 (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.

COVAD'S RESPONSE TO NO. 23 (Bench Request No. 54):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, Covad does not own or control any fiber in Washington State.

CLEC QUESTION NO. 24: (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 CLEC Questions No. 19 and 22. If so, please describe the affiliation.

COVAD'S RESPONSE TO QUESTION NO. 24 (Bench Request No. 55):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, Covad is not affiliated with Qwest in any way or with any other carrier.

CLEC QUESTION NO. 25 (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.

COVAD'S RESPONSE TO QUESTION NO. 25 (Bench Request No. 56):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, Covad does not have any dark fiber Indefeasible Rights of Use (IRUs) between any two Qwest wire centers or other facilities.

CLEC QUESTION NO. 26 (Bench Request No. 57):

If you have identified any long-term dark fiber IRUs in your answer to CLEC Question No. 25, 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.

COVAD'S RESPONSE TO QUESTION NO. 26 (Bench Request No. 57):

Covad references and incorporates herein its above General Objections. Subject to and without waiving Covad's objections, Covad has no information responsive to this Request.

CLEC QUESTION NO. 27 (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.

COVAD'S RESPONSE TO QUESTION NO. 27 (Bench Request No. 58):

Covad references and incorporates herein its above General Objections. Further, the term "rate center" is not defined. Subject to and without waiving Covad's previous objections, Covad purchases UNE-Ls and DS1 and DS3 transport from Qwest to provide connectivity over the last mile (UNE-Ls) and to transport data traffic (DS1s and DS3s) from one Qwest wire center to another Qwest wire center. All applicable rates are set forth in SGAT, Exhibit A.

CLEC QUESTION NO. 28 (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.

COVAD'S RESPONSE TO QUESTION NO. 28 (Bench Request No. 59):

Covad references and incorporates herein its above General Objections. Further, this Request is unduly burdensome and overly broad. Subject to and without waving Covad's previous objections, data responsive to No. 28(a) and No. 28(c) is attached.

- (a) See attached Exhibit A. **[Highly confidential information redacted.]**
- (b) See attached Exhibit A. **[Highly confidential information redacted.]**
- (c) See attached Exhibit A. **[Highly confidential information redacted.]**
- (d) Data responsive to No. 28(d) is the type of equipment typically found at ILEC collocation sites and is not Qwest specific. See Exhibit F. **[Highly confidential information redacted.]**
- (e) Covad provides Broadband services.
- (f) Cost of equipment. **[Highly confidential information redacted.]**
- (g) See Exhibit A attached. **[Highly confidential information redacted.]**

- (h) **[Highly confidential information redacted.]**
- (i) Covad does not track space capacity and is therefore unable to provide that information.

- (j) **[Highly confidential information redacted.]**

CLEC QUESTION NO. 29 (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.

COVAD'S RESPONSE TO QUESTION NO. 29 (Bench Request No. 60):

Covad references and incorporates herein its above General Objections. Further, this Request is unduly burdensome and overly broad. Subject to and without waving Covad's previous objections, Covad is providing the following responsive data,

- (a) **[Highly confidential information redacted.]**
- (b) **[Highly confidential information redacted.]**
- (c) **[Highly confidential information redacted.]**
- (d) Covad provides Broadband services.
- (e) **[Highly confidential information redacted.]**
- (f) **[Highly confidential information redacted.]**

CLEC QUESTION NO. 30 (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.

COVAD'S RESPONSE TO QUESTION NO. 30 (Bench Request No. 61):

Covad references and incorporates herein its above General Objections. Subject to and without waving Covad's previous objections, Covad has no information responsive to this Request. Covad does not have any CLEC to CLEC cross-connects in Washington State.

CLEC QUESTION NO. 31 (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.

COVAD'S RESPONSE TO QUESTION NO. 31 (Bench Request No. 62):

Covad references and incorporates herein its above General Objections. Subject to and without waving Covad's previous objections, Covad was not denied the ability to undertake the connections identified.

RESPECTFULLY SUBMITTED this 26th day of November, 2003.

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