

November 26, 2003

VIA E-MAIL AND UPS OVERNIGHT

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-033044

Dear Ms. Washburn:

Enclosed for filing are the original and six copies of MCI's Responses and Objections to CLEC Questions, including confidential responses. A copy was also sent to the Commission electronically. Highly confidential responses are being sent under separate cover pursuant to Commission Order No. 05. Please contact me with any questions.

Very truly yours,



Lisa F. Rackner

cc: Parties of record

CERTIFICATE OF SERVICE

I hereby certify that I have this 25th day of November, 2003, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn	<input type="checkbox"/>	Hand Delivered
Executive Secretary	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Washington Utilities and Transportation Commission	<input checked="" type="checkbox"/>	Overnight Mail (UPS)
1300 S Evergreen Park Drive SW	<input type="checkbox"/>	Facsimile (360) 586-1150
Olympia, WA 98504-7250	<input checked="" type="checkbox"/>	Email (records@wutc.wa.gov)

I hereby certify that I have this 25th day of November, 2003, served a true and correct copy of the foregoing document upon parties of record, via the method(s) noted below, properly addressed as follows:

On Behalf Of Eschelon:

Dennis D. Ahlers	<input type="checkbox"/>	Hand Delivered
Eschelon Telecom, Inc.	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
730 2nd Avenue South, Suite 1200	<input type="checkbox"/>	Overnight Mail (UPS)
Minneapolis MN 55402-2456	<input type="checkbox"/>	Facsimile (612) 436-6792
<i>Confidentiality Status: Highly Confidential</i>	<input checked="" type="checkbox"/>	Email (ddahlers@eschelon.com)

On Behalf Of Advanced TelCom:

Victor A. Allums	<input type="checkbox"/>	Hand Delivered
GE Business Productivity Solutions, Inc.	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
6540 Powers Ferry Road	<input type="checkbox"/>	Overnight Mail (UPS)
Atlanta GA 30339	<input type="checkbox"/>	Facsimile (770) 644-7752
<i>Confidentiality Status: Public</i>	<input checked="" type="checkbox"/>	Email (vic.allums@ge.com)

On Behalf Of Qwest:

Lisa A. Anderl	<input type="checkbox"/>	Hand Delivered
Qwest Corporation	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
1600 7th Avenue, Room 3206	<input type="checkbox"/>	Overnight Mail (UPS)
Seattle WA 98091	<input type="checkbox"/>	Facsimile (206) 343-4040
<i>Confidentiality Status: Highly Confidential</i>	<input checked="" type="checkbox"/>	Email (lisa.anderl@qwest.com)

On Behalf Of Allegiance:

Jeffrey J. Binder	<input type="checkbox"/>	Hand Delivered
Allegiance Telecom	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
1919 M Street NW, Suite 420	<input type="checkbox"/>	Overnight Mail (UPS)
Washington DC 20036	<input type="checkbox"/>	Facsimile (202) 464-0762
<i>Confidentiality Status: Public</i>	<input checked="" type="checkbox"/>	Email (jeff.binder@algx.com)

On Behalf Of AT&T:

Cathy L. Brightwell
AT&T Government Affairs
2120 Caton Way SW, Suite B
Olympia WA 98502-1106

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 705-4177
 Email (brightwell@att.com)

On Behalf Of McLeod:

William Courter
McLeodUSA Telecommunications Services,
Inc.
McLeod USA Technology Park
6400 C Street SW
Cedar Rapids IA 52403

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (319) 790-7901
 Email (wcourter@mcleodusa.com)

On Behalf Of AT&T:

Rebecca B. DeCook
AT&T Communications
1875 Lawrence Street, Suite 1575
Denver CO 80202

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (303) 298-6301
 Email (decook@att.com)

On Behalf Of Verizon:

Kimberly A. Douglass
Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email (kimberly.a.douglass@verizon.com)

On Behalf Of Public Counsel:

Simon J. ffitc
Attorney General of Washington
900 Fourth Avenue, Suite 2000
Seattle WA 98164

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 389-2058
 Email (simonf@atg.wa.gov)

On Behalf Of Covad:

Karen S. Frame
Covad Communications Company
7901 Lowry Boulevard
Denver CO 80230-6906

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (720) 208-3350
 Email (kframe@covad.com)

On Behalf Of Verizon:

Joan Gage
Verizon Corp.
1800 41st Street
WA0101RA
P.O. Box 1003
Everett WA 98201

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (425) 261-5262
 Email (joan.gage@verizon.com)

On Behalf Of Advanced TelCom:

Meredith H. Gifford
GE Business Productivity Solutions, Inc.
6540 Powers Ferry Road
Atlanta GA 30339

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (770) 644-7752
 Email (meredith.gifford@ge.com)

On Behalf Of McLeod:

William Haas
McLeodUSA Telecommunications Services,
Inc.
McLeod USA Technology Park
6400 C Street SW
Cedar Rapids IA 52403

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (319) 790-7901
 Email (whaas@mcleodusa.com)

On Behalf Of Covad, NWCCC:

Brooks E. Harlow
Miller Nash LLP
601 Union Street, Suite 4400
Seattle WA 98101-1367

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 622-7485
 Email (brooks.harlow@millernash.com)

On Behalf Of Integra:

Deborah Harwood
Integra Telecom of Washington, Inc.
19545 NW Von Neumann Dr., Suite 200
Beaverton OR 97006-6906

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 748-1212
 Email
 (deborah.harwood@integratelecom.com)

On Behalf Of Sprint:

William E. Hendricks III
Sprint Communications Co. LP
902 Wasco Street A0412
Hood River OR 97031-3105

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (541) 387-9753
 Email
 (tre.e.hendricks.iii@mail.sprint.com)

On Behalf Of NWCCC:

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue, Suite 240
Gig Harbor WA 98335

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (253) 851-6474
 Email (aisar@millerisar.com)

On Behalf Of Integra:

Karen J. Johnson
Integra Telecom of Washington, Inc.
19545 NW Von Neumann Dr., Suite 200
Beaverton OR 97006-6906

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 748-1212
 Email
 (karen.johnson@integratelecom.com)

On Behalf Of Sprint:

Nancy L. Judy
Sprint Communications Co. LP
902 Wasco Street A0412
Hood River OR 97031-3105

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (541) 387-9753
 Email (nancy.judy@mail.sprint.com)

On Behalf Of XO:

Rex Knowles
XO Oregon, Inc.
111 E Broadway, Suite 1000
Salt Lake City UT 84111

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (801) 983-1504
 Email (rex.knowles@xo.com)

On Behalf Of Advanced Telecom, Eschelon, Global Crossing, etc:

Gregory J. Kopta
Davis Wright Tremaine LLP
1501 4th Avenue, Suite 2600
Seattle WA 98101-1688

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 628-7699
 Email (gregkopta@dwt.com)

On Behalf Of DoD & Other Federal Agencies:

Stephen S. Melnikoff
US Army Litigation Center
Regulatory Law Office
901 N Stuart Street, Suite 700
Arlington VA 22203-1837

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (703) 696-2960
 Email (stephen.melnikoff@hqda.army.mil)

On Behalf Of Verizon:

Timothy J. O'Connell
Stoel Rives LLP
600 University Street, Suite 3600
Seattle WA 98101-3197

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 386-7500
 Email (tjconnell@stoel.com)

On Behalf Of Eschelon:

J. Jeffery Oxley
Eschelon Telecom, Inc.
730 2nd Avenue South, Suite 1200
Minneapolis MN 55402-2456

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (612) 436-6792
 Email (jjoxley@eschelon.com)

On Behalf Of Global Crossing:

Diane Peters
Global Crossing
1080 Pittsford-Victor Road
Pittsford NY 14534

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (585) 381-6781
 Email (diane.peters@globalcrossing.com)

On Behalf Of Commission:

Ann E. Rendahl ALJ
Washington Utilities and Transportation
Commission
1300 S Evergreen Park Drive SW
PO Box 47250
Olympia WA 98504-7250

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 586-8203
 Email (arendahl@wutc.wa.gov)

On Behalf Of Qwest:

Mark S. Reynolds
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle WA 98091

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 346-7289
 Email (mark.reynolds3@qwest.com)

On Behalf Of Covad, NWCCC:

David L. Rice
Miller Nash LLP
601 Union Street, Suite 4400
Seattle WA 98101-1367

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 622-7485
 Email (david.rice@millernash.com)

On Behalf Of Qwest:

Adam L. Sherr
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle WA 98091

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 343-4040
 Email (adam.sherr@qwest.com)

On Behalf Of Global Crossing:

Michael Shortley
Global Crossing
1080 Pittsford-Victor Road
Pittsford NY 14534

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (585) 381-6781
 Email (michael.shortley@globalcrossing.com)

On Behalf Of MCI:

Michel L. Singer Nelson
WorldCom, Inc.
707 17th Street, Suite 4200
Denver CO 80202-3432

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (303) 390-6333
 Email (michel.singer_nelson@mci.com)

On Behalf Of Qwest:

Ted D. Smith
Stoel Rives LLP
201 South Main Street, Suite 1100
Salt Lake City UT 84111-4904

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (801) 578-6999
 Email (tsmith@stoel.com)

On Behalf Of DoD & Other Federal Agencies:

Robert W. Spangler
Snively King Majoros O'Connor & Lee, Inc. Hand Delivered
1220 L Street NW, Suite 410 U.S. Mail (first-class, postage prepaid)
Washington DC 20005 Overnight Mail (UPS)
 Facsimile (202) 842-4966
 Email (rspangler@snively-king.com)

Confidentiality Status: Public

On Behalf Of PacWest:

Ethan Sprague
PAC/WEST Communications Hand Delivered
1776 W March Lane, Suite 250 U.S. Mail (first-class, postage prepaid)
Stockton CA 95207 Overnight Mail (UPS)
 Facsimile (209) 601-6528
 Email (esprague@pacwest.com)

Confidentiality Status: Public

On Behalf Of Allegiance:

Mark A. Stachiw
Allegiance Telecom Hand Delivered
9201 North Central Expressway U.S. Mail (first-class, postage prepaid)
Dallas TX 75231 Overnight Mail (UPS)
 Facsimile (469) 259-9122
 Email (mark.stachiw@algx.com)

Confidentiality Status: Public

On Behalf Of Qwest:

Chuck Steese
Steese & Evans Hand Delivered
Suite 1820 U.S. Mail (first-class, postage prepaid)
6400 S Fiddler's Green Circle Overnight Mail (UPS)
Denver CO 80111 Facsimile (720) 200-0697
 Email (csteese@s-elaw.com)

Confidentiality Status: Highly Confidential

On Behalf Of AT&T:

Mary Taylor
AT&T Government Affairs Hand Delivered
2120 Caton Way SW, Suite B U.S. Mail (first-class, postage prepaid)
Olympia WA 98502-1106 Overnight Mail (UPS)
 Facsimile (360) 705-4177
 Email (marymtaylor@att.com)

Confidentiality Status: Confidential

On Behalf Of Time Warner:

Brian D. Thomas
Time Warner Telecom Hand Delivered
223 Taylor Avenue North U.S. Mail (first-class, postage prepaid)
Seattle WA 98109-5017 Overnight Mail (UPS)
 Facsimile (206) 676-8001
 Email (brian.thomas@twtelecom.com)

Confidentiality Status: Public

On Behalf Of Staff:

Jonathan Thompson
Attorney General of Washington
Utilities & Transportation Division
1400 S Evergreen Park Drive SW
PO Box 40128
Olympia WA 98504-0128

Confidentiality Status: Highly Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 586-5522
 Email (jthomps@wutc.wa.gov)

On Behalf Of AT&T:

Adam Walczak
AT&T Communications
1875 Lawrence Street, Suite 1575
Denver CO 80202

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (303) 298-6301
 Email (awalczak@att.com)

On Behalf Of Covad:

Charles E. Watkins
Covad Communications Company
1230 Peachtree Street NE, 19th Floor
Atlanta GA 30309

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (404) 942-3495
 Email (g Watkins@covad.com)

On Behalf Of Sprint:

Barbara Young
Sprint Communications Co. LP
902 Wasco Street A0412
Hood River OR 97031-3105

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (541) 387-9753
 Email (barbara.c.young@mail.sprint.com)

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 25th day of November, 2003, at Portland, Oregon


Lisa Rackner

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

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

**MCI'S RESPONSES AND OBJECTIONS
TO CLEC QUESTIONS**

WorldCom, Inc., on behalf of its regulated subsidiaries operating in Washington ("MCI"), respectfully submits these responses and objections to the October 23, 2003 CLEC Questions and states as follows:

GENERAL OBJECTIONS

1. MCI has interpreted the CLEC Questions to apply to MCI's regulated intrastate operations in Washington and will limit its responses accordingly. To the extent that the CLEC Questions are intended to apply to matters that take place outside the state of Washington and which are not related to Washington intrastate operations subject to the jurisdiction of the Washington State Utilities and Transportation Commission ("Commission"), MCI objects to such Questions as irrelevant, overly broad, unduly burdensome, and oppressive.

2. MCI objects to the CLEC Questions to the extent they seek information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

3. MCI objects to the CLEC Questions to the extent they are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations, but are not properly defined or explained for purposes of the Questions.

4. MCI objects to the CLEC Questions to the extent they seek information not reasonably calculated to lead to the discovery of admissible evidence, and/or information that is not relevant to the subject matter of this action.

5. MCI objects to the CLEC Questions to the extent they seek information or documents, or seek to impose obligations on MCI which exceed the requirements of the FCC's Triennial Review Order ("TRO"), Washington Rules of Civil Procedure, Washington law, the Commission's Rules of Practice and Procedure, and other Commission rules or any other applicable laws, rules, or procedures.

6. MCI objects to the CLEC Questions to the extent they seek information that is already in the public record before the Commission or which is already in the possession, custody, or control of the Commission.

7. MCI objects to the CLEC Questions to the extent they are overly broad, unduly burdensome, expensive, oppressive, or excessively time-consuming as written.

8. MCI is a large corporation with employees located in many different locations in Washington and in other states. In the course of its business, MCI creates countless documents that are not subject to the Commission's or FCC's retention of records requirements. These documents are kept in numerous locations and 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. MCI will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requested information and will supplement its discovery responses if appropriate. To the extent that the CLEC Questions purport to require more, MCI objects on the grounds that compliance would impose an undue burden or expense.

9. MCI objects to the CLEC Questions to the extent they request that MCI provide information that MCI does not maintain in the ordinary course of business. This objection includes, but is not limited to, certain information at the ILEC wire center district level. MCI does not maintain certain data at ILEC wire center district level. MCI maintains that data at the "NPA/NXX" level rather than at the ILEC wire center district level.

10. MCI objects to the CLEC Questions to the extent they seek to have MCI create documents not in existence at the time of the request.

11. MCI objects to the CLEC Questions to the extent they are not limited to any stated period of time, or a stated period of time that is longer than is relevant for purposes of the issues in this docket, as such discovery is overly broad and unduly burdensome.

12. In light of the short period of time MCI has been afforded to respond to the CLEC Questions, the development of MCI's positions and potentially responsive information to the CLEC Questions is necessarily ongoing and continuing. MCI expressly reserves the right to supplement or modify its discovery responses based on its ongoing inquiry.

13. MCI objects to the CLEC Questions that seek to obtain "all", "each", or "every" document, item, customer, or other such piece of information, to the extent that such discovery is overly broad and unduly burdensome.

14. MCI objects to the CLEC Questions to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Washington law and the "Uniform Trade Secrets Act." Notwithstanding that objection, and without waiving that objection, MCI will produce privileged trade secret information subject to the terms of the highly confidential protections in the protective order issued in this case.

15. MCI objects to the CLEC Questions to the extent they seek information regarding so-called “voice-grade equivalent lines” (“VGEs”), as this term is not used by MCI in the course of its business, and MCI does not maintain information regarding “voice-grade equivalent lines” in the ordinary course of business. Given MCI’s business records, MCI will answer such Questions by providing information regarding MCI’s DS0s.

16. MCI objects to the CLEC Questions that seek information regarding non-switched services (*e.g.*, services that do not depend on local Class 5 switches) except for non-switched services (*e.g.*, DSL) provided on loops that are also used to provide switched services), as such discovery is irrelevant for purposes of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

17. MCI objects to the CLEC Questions to the extent they seek information regarding MCI’s operations in ILEC service areas other than the service area within the state of Washington, as such information is irrelevant to Qwest’s case in this docket and such discovery is overly broad and unduly burdensome.

18. MCI objects to the definitions for “qualifying service” and “non-qualifying service,” and each and every one of the CLEC Questions that includes such terms, as MCI does not use such terms in the ordinary course of business, does not maintain information regarding “qualifying service” and “non-qualifying service” in the ordinary course of business, and answering in these terms would require MCI to provide a legal interpretation of the FCC’s terms. With the exception of the specific services the FCC has designated as qualifying or non-qualifying, the term is not clearly defined by the FCC or by the CLEC Questions. For example, as the FCC stated in footnote 466 of the TRO Order (FCC 03-36, released August 21, 2003) “[o]ur list is intended to identify general categories of services that would qualify as eligible

services. It is not intended to be an exhaustive list or to identify services in a more particular manner.” Thus, such discovery is vague.

19. MCI objects to the definitions for “hot cut”, “batch hot cut”, and “individual hot cut”, and each and every one of the CLEC Questions that include such terms, because it is not clear whether or to what extent Qwest’s practices are consistent with the FCC’s use of such terms, however such terms may be defined by the FCC. Thus, such discovery is vague. MCI further objects to the use of such terms as they apply to Qwest’s individual hot cut process as MCI is not privy to each and every process or procedure employed by Qwest in implementing such hot cuts.

20. MCI objects to the CLEC Questions to the extent they seek information not within MCI’s possession, custody, or control.

21. MCI objects to each and every one of the CLEC Questions that seeks information regarding MCI’s projections regarding future services, revenues, marketing, strategies, equipment deployments, or other such future business plans as such requests are trade secrets and, for purposes of this proceeding, would be highly speculative and irrelevant to the issues to be decided in this docket. Moreover, MCI’s future plans are irrelevant because the TRO concerns a hypothetical CLEC.

RESPONSES

Subject to and without waiver of its General Objections, MCI responds to the CLEC Questions as follows:

CLEC QUESTION NO. 1 (Bench Request No. 32):

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

RESPONSE:

MCI has not used on a commercial basis any Qwest-purported hot cut processes within the Qwest 14-state region to move MCI's UNE-P customers to UNE-L and MCI switching facilities to date either individually or in a "batch".

CLEC QUESTION NO. 2 (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:

MCI is unfamiliar with Qwest's hot cut process. See Response to CLEC Question No. 1.

CLEC QUESTION NO. 3 (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:

Because the batch hot cut (BHC) process will necessarily be implemented by Qwest, and not by CLECs such as MCI, MCI has not developed a process that it would implement in order to meet the FCC's requirements. However, MCI can offer some characteristics of a batch hot cut process that it believes are necessary in order to satisfy the FCC's requirements.

- A BHC process must be developed with a clear understanding of all of the affected systems, procedures and practices in mind, so that all inter-related systems will perform effectively under commercial loads.
- A BHC process must be transparent to the customer.
- A BHC process must incorporate processes for CLEC to CLEC migrations and CLEC to ILEC migrations that will occur after the embedded base of a given CLEC has been transitioned to UNE L in a given geographic market or the migration of customers who have CLEC data services from UNE-P line splitting to UNE-L line splitting.

With regard to the maximum size of a "batch", MCI believes that a cap should be imposed only where, and to the extent that, some constraining factor exists in Qwest's hot cut process such that batches larger than the cap would strain the process in an unacceptable fashion. It is MCI's position that whatever hot cut process is ultimately adopted must be scalable such that, over some period of time, it can accommodate all the necessary day-to-day orders that will arise in a robustly competitive marketplace. As such, MCI is unable to provide the Commission with a quantitative response in this regard until it has seen the hot cut process in operation that has been proposed by Qwest in this proceeding, and can further assess the potential bottlenecks it might include. For example, it is quite possible that a "cap" on the number of loops submitted via a batch hot cut request might make sense for some limited period of time given an interim solution, until a more automated and seamless long term solution can be accomplished.

A thorough review of the Qwest's proposed process is a necessary pre-requisite to MCI answering this question in full. Hence, MCI reserves its right to raise additional issues after having had the opportunity to review the recommendations of other parties.

In addition, MCI incorporates herein the comments contained in its response to Qwest's proposal for a batch hot cut process filed with this Commission on November 18, 2003.

CLEC QUESTION NO. 4 (Bench Request No. 35):

Please list each task that is part of the batch cut process described in your response to CLEC Question No. 3, 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:

For the reasons set forth in response to CLEC Question No. 3, MCI cannot respond to this question at this time.

CLEC QUESTION NO. 5 (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:

MCI has not incurred any costs to manage and participate in Qwest's hot cut process.

CLEC QUESTION NO. 6 (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:

Subject to and without waiving its General Objections, MCI states that it is continuing to search for information responsive to this Question and will provide further information promptly when it becomes available.

CLEC QUESTION NO. 7 (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:

As noted in response to previous questions, MCI has not used any Qwest hot cut process, and so cannot answer this question directly. However, Qwest's Proposed Batch Hot Cut Process relies on Qwest OSS in order to send such a batch hot cut request. For this reason, MCI's experiences with Qwest's OSS are informative..

In MCI's experience, Qwest's OSS has been the most deficient in the country and has resulted in reject rates higher than in any other BOC region. Since entering the local market in the Qwest region, MCI has had to engage in lengthy trial-and-error processes that required MCI to expend significant resources in deciphering Qwest's poor documentation and non-standard OSS. Through these efforts MCI's reject level in the Qwest region has been reduced to 32% (as of the week of November 7, 2003) for residential customers, down from the 50% reject rate that existed earlier in the summer of 2003. Nevertheless, a 32% reject rate is too high and remains higher than any other BOC region of the country.

The primary reasons for these reject rates relate to Qwest's requirement that CLECs provide a full-service address on maintenance orders, and Qwest's requirement that CLECs include the correct customer code on orders, which is a Qwest code that changes after CLECs submit their initial migration orders.

In addition, Qwest's change management document lacks sufficient language to require that Qwest correct software defects within a specific timeframe. Without such language, CLECs have no guarantees that software defects will be fixed in a timely manner. MCI initiated a change request in April 2003 seeking a requirement that Qwest provide these timeframes. All CLECs voted in favor of this request, but because the Qwest change management plan requires a unanimous vote in order for a request to be approved, Qwest's vote against it resulted in the change request not passing.

In addition, AT&T initiated a change request seeking a log of all system defects, which would allow CLECs to track defects in a single document. All BOCs except Qwest provide such a log, which allows CLECs to understand what problems have occurred as part of a software release, when those problems will be corrected, and how CLECs are impacted. Such a document allows the tracking of corrections to problems and allows CLECs to anticipate customer problems. Qwest's response has been that each CLEC should just compile piecemeal the "Event Notifications" published by Qwest. But this would be a tedious effort that could easily result in inaccuracies. More importantly, without a log of defects with definitive fix dates, CLECs will be unable to plan their own systems corrections or understand what order types will fail until those defects are resolved. Nevertheless, Qwest denied this change request.

These high reject rates and examples of Qwest's OSS and process deficiencies do not give MCI confidence that Qwest will be able to timely and accurately complete batch hot cuts even as it has proposed.

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.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

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.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

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.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

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.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

HIGHLY CONFIDENTIAL PER PROTECTIVE ORDER IN WUTC DOCKET NO. UT 033044

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 CLLI code, for which you are currently using that switch to provide qualifying service to any end user customers.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

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.*

RESPONSE:

Subject to and without waiving its General Objections, MCI states that it is continuing to search for information responsive to this Question, and will provide further information promptly if it becomes available.

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).

RESPONSE:

REDACTED – CONFIDENTIAL

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.

RESPONSE:

MCI objects to CLEC Question No. 15 for the reasons set forth in its General Objections; in particular, on the grounds that it is overly broad, unduly burdensome, expensive, oppressive, and excessively time consuming as written, and seeks information that MCI does not maintain in the ordinary course of business.

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.

RESPONSE:

MCI objects to CLEC Question No. 16 for the reasons set forth in its General Objections; in particular, on the grounds that it is overly broad, unduly burdensome, expensive, oppressive, and excessively time consuming as written, and seeks information that MCI does not maintain in the ordinary course of business.

CONFIDENTIAL PER PROTECTIVE ORDER IN WUTC DOCKET NO. UT 033044

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.

RESPONSE:

REDACTED – CONFIDENTIAL

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.

RESPONSE:

Subject to and without waiving its General Objections, MCI states that it is continuing to search for information responsive to this Question, and will provide information promptly if it becomes available.

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.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

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.

RESPONSE:

Subject to and without waiving its General Objections, MCI states that it is continuing to search for information responsive to this Question, and will provide further information promptly if it becomes available.

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.

RESPONSE:

REDACTED – CONFIDENTIAL

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.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

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.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

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.

RESPONSE:

Subject to and without waiving its General Objections, MCI states that it is not affiliated with Qwest or with any other carrier that serves “transport routes” (as MCI believes the Commission intends that term to mean) at which MCI owns transport. MCI also refers Staff to MCI’s objection to CLEC Question No. 22.

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.

RESPONSE:

Subject to and without waiving its General Objections, MCI states that it is continuing to search for information responsive to this Question, and will provide information promptly if it becomes available.

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.

RESPONSE:

Subject to and without waiving its General Objections, MCI states that it is continuing to search for information responsive to the question of whether it has any IRUs, as requested in CLEC Question No. 25, and will provide information promptly if it becomes available. MCI objects to CLEC Question No. 26 for the reasons set forth in its General Objections; in particular, on the grounds that it is overly broad, unduly burdensome, expensive, oppressive, and excessively time consuming as written, and seeks information that MCI does not maintain in the ordinary course of business.

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.

RESPONSE:

Subject to and without waiving its General Objections, MCI states that all rates and/or rate elements that apply when a CLEC purchases UNE-L and special access, EEL, DS1, DS3, or dark fiber transport from a Qwest rate center are set forth in tariffs and/or interconnection agreements approved by and on file with the Commission. MCI refers Staff to those tariffs and/or interconnection agreements. To the extent this Question seeks to impose an obligation on MCI to compile that information, MCI objects for the reasons set forth in its General Objections; in particular, on the grounds that it is overly broad, unduly burdensome, expensive, oppressive, and excessively time consuming as written, and seeks information that MCI does not maintain in the ordinary course of business.

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.

RESPONSE:

MCI refers Staff to MCI's response to CLEC Question No. 19. To the extent this Question seeks to require MCI to provide information other than information provided in response to Question No. 19, MCI for the reasons set forth in its General Objections; in particular, on the grounds that it is overly broad, unduly burdensome, expensive, oppressive, and excessively time consuming as written, and seeks information that MCI does not maintain in the ordinary course of business.

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.

RESPONSE:

REDACTED – HIGHLY CONFIDENTIAL

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.

RESPONSE:

Subject to and without waiving its General Objections, MCI states that it is continuing to search for information responsive to this Question, and will provide information promptly if it becomes available.

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.

RESPONSE:

Subject to and without waiving its General Objections, MCI states that it is not aware of any such wire centers.

REDACTED

HIGHLY CONFIDENTIAL

REDACTED IN ITS ENTIRETY (58 OF 58 PAGES)

HIGHLY CONFIDENTIAL

REDACTED

HIGHLY CONFIDENTIAL

REDACTED

HIGHLY CONFIDENTIAL

REDACTED IN ITS ENTIRETY (8 OF 8 PAGES)

HIGHLY CONFIDENTIAL

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

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

DECLARATION OF

Don Price

I, Don Price, declare under penalty of perjury under the laws of the State of
Washington that the following is true and correct:

1. I am the Senior Manager - Competition Policy, of
MCI (company name), a competitive local exchange carrier operating in
Washington.

2. I submit this declaration on personal knowledge of the facts declared herein.

3. The data provided by MCI (company name) to the

Washington Utilities and Transportation Commission pursuant to the Commission's Order
Requiring Disclosure of Information is true and correct.

DATED and SIGNED at Denver, ~~Washington~~ Colorado on Nov 26, 2003.

Don Price
Signature