

**WUTC Docket No. UT-033044**  
**Eschelon Telecom, Inc. Responses to Bench Requests**  
**November 26, 2003**

**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 CLI 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:**

All information in the LERG is accurate and current.

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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:
  - (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:**

None

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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:**

None

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**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:**

This information is unavailable. In most, if not all, instances, moreover, Eschelon's costs are not relevant to the determinations to be made in this proceeding. In addition, some of the facilities are several years old and any cost information would be out of date.

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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:**

None

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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:**

No

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**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:**

None

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**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:**

Does not apply.

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**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:**

See Qwest WN U-43, Interconnection Services Tariff, section 3; Qwest FCC Tariff No. 1, sections 7.11 (DS1 transport), 7.12 (DS3 transport), and 7.18 (dark fiber).

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**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:**

None

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