

**WUTC Docket No. UT-033044**  
**Pac-West Telecomm, Inc.'s Responses to Bench Requests**  
**November 26, 2003**

**BENCH REQUEST NO. 40:**

For each of the switches identified in your response to Bench Request No. 39, please state whether you own the switch, lease the switching capacity, use the switch on an unbundled or resale basis, or otherwise have obtained the right to use the switch on some non-ownership basis. If you do not own the facility, please identify (a) the entity owning the switch and, if different than the owner of the switch, the entity with which you have entered into the lease or other arrangement, (b) the nature of the arrangement, and (c) whether the entity or entities are affiliates of yours, in the sense defined in paragraph 408, footnote 1263, of the Triennial Review Order.

**RESPONSE:**

Pac-West owns all switches.

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**BENCH REQUEST NO. 41:**

Please identify whether the information in the Local Exchange Routing Guide (LERG) for Washington state is current and accurate for the switches that you listed in response to Bench Request No. 39. If any of the information is not accurate, please identify the inaccurate information and provide corrected information, including any additions, deletions or changes. As part of your review of the information in the LERG, please state whether the CLLI code is accurate for each switch that you identified in response to Bench Request No. 39. In addition, please state whether the LERG definition of the function of each switch (*i.e.*, tandem, end office, etc.) is accurate.

**RESPONSE:**

Pac-West's LERG information is correct.

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**BENCH REQUEST NO. 47:**

With respect to the lines identified in your response to Bench Request No. 44, please provide, beginning with January 1, 2003, the average total monthly cost incurred per line served in Washington State by LATA, MSA, and wire center, and specify the source of those costs by service type. These costs should include costs associated with switching; loops; collocation; transport; hot cuts; OSS; signaling; customer acquisitions; backhauling traffic to your switches; maintenance, operations, and other administrative activities; and capital costs. Please provide any available breakdowns of each cost component that is part of the average total cost per line, identifying the type and amount of each cost. Please identify any cost differences between types of customers served.

**RESPONSE:**

Pac-West does not maintain responsive data in the form requested.

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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:**

No, Pac-West does not provide or plan to provide qualifying service to other carriers in Washington state.

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**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:**

Churn rate: 0

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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, Pac-West does not provide or offer transport facilities to other carriers.

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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:**

Pac-West does not maintain responsive data in the form requested.

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**BENCH REQUEST NO. 53:**

Please identify the points within Washington state and the location (by street address and/or V & H coordinates) at which you connect your local network facilities to the networks of carriers other than Qwest, including interconnection with other CLECs, interexchange carriers, or internet service providers at any point of presence (POP), network access point (NAP), collocation hotel, data center, or similar facility.

**RESPONSE:**

Pac-West understands that the scope of this proceeding is Qwest's obligation to provide unbundled local switching in specific markets and unbundled transport along specific routes. This request seeks data that is unrelated to those issues. Pac-West, therefore, seeks additional guidance from the Commission on how the requested information relates to the issues in this proceeding before devoting the substantial resources that would be required to provide that information.

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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:**

No, Pac-West has no fiber rings in this state.

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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, Pac-West is not affiliated with Qwest in any way or with any other carrier that serves the transport routes or connection points identified in response to BR Nos. 50 and 53.

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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:**

No, Pac-West does not have any long-term dark fiber Indefeasible Rights of Use between any two Qwest wire centers or other facilities in the same LATA in Washington state.

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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:**

See Response to Bench Request No. 56.

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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:**

Pac-West purchases services out of Qwest WN U-42 Interconnection Services - See Quest tariff at: <http://tariffs.uswest.com:8000/docs/TARIFFS/Washington/WAIT/>

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**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:**

Pac-West does not collocate.

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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:**

Pac-West understands that the scope of this proceeding is Qwest's obligation to provide unbundled local switching in specific markets and unbundled transport along specific routes. This request seeks data that is unrelated to those issues. Pac-West, therefore, seeks additional guidance from the Commission on how the requested information relates to the issues in this proceeding before devoting the substantial resources that would be required to provide that information.

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**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:**

See Response to Bench Request No. 59.

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**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:**

See Response to Bench Request No. 59.

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