

QWEST CORPORATION

STATE: Washington
DOCKET NO: UT-063038
CASE DESCRIPTION: Qwest Corp. v. Level 3 Comm. LLC; Pac-West Telecomm. Inc.; Northwest Telephone Inc.; TCG-Seattle; Electric Lightwave, Inc.; Advanced Telecom Group Inc. d/b/a Eschelon Telecom, Inc.; Focal Comm. Corp.; Global Crossing Local Services, Inc; and MCI Worldcom Comm. Inc.
INTERVENOR: Pac-West Telecomm, Inc.
REQUEST NO: PWT 01-012

REQUEST:

Re Direct Testimony of Dr. William R. Fitzsimmons at 12, lines 6-8, please provide all cost studies, analyses, or other evidence to support the existence and amount of the portion of Qwest's traffic sensitive costs in Washington that are caused by dial-up Internet access. Please separately identify the costs caused by dial-up Internet access provided by ISPs who obtain local service from CLECs. Please provide all documents that support your response.

RESPONSE:

The point of the statement cited in this data request is that ISP traffic generates a significant amount of cost, and this point does not require studies, analyses, or evidence other than what is in Dr. Fitzsimmons' testimony.

The fact that dial-up Internet access requires the use of local switching and generates a cost is an undisputed fact. This cost is the basis for switched access prices, and it was the subject of numerous proceedings related to the pricing of unbundled local switching. The fact that there is a substantial amount of dial-up Internet traffic is also beyond reasonable dispute. Seventy-four percent of households in Washington have Internet access, and 42 percent of the households in Qwest's footprint used dial-up access in 2006. This type of usage is clearly significant, as are the costs caused.

Respondent: William Fitzsimmons

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INTERVENOR: Pac-West Telecomm, Inc.

REQUEST NO: PWT 01-013

REQUEST:

Re Direct Testimony of Dr. William R. Fitzsimmons at 13, lines 3-14, please provide all cost studies, analyses, or other evidence to demonstrate that Qwest's local service prices do not recover any additional switching costs that Qwest incurs to enable its local service customers to obtain dial-up Internet access from the ISP of their choice, regardless of the physical location of that ISP.

RESPONSE:

The point of the statement cited in this data request is that a portion of Qwest's costs are attributed to local services, and local service prices are designed to recover these costs. Local service prices are not designed to recover costs associated with non-local traffic. The proper responsibility for recovering costs attributed to non-local traffic belongs to the customers of non-local services. This point requires no additional studies, analyses, or evidence.

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INTERVENOR: Pac-West Telecomm, Inc.

REQUEST NO: PWT 01-014

REQUEST:

Re Direct Testimony of Dr. William R. Fitzsimmons at 14-16, please provide any and all research, studies, or analysis that Qwest has undertaken on the financial impact on, and the availability of competitive alternatives to, consumers who rely on dial-up Internet access if the Commission were to prohibit "VNXX" as that term is used in the testimony.

RESPONSE:

No additional research, studies, or analyses are required to support Dr. Fitzsimmons' position that requiring CLECs to pay for the costs they cause is in the best long term interest of the citizens of Washington.

[Note: Dr. Fitzsimmons' middle initial is 'L.']

Respondent: William Fitzsimmons