

July 19, 2004

*Sent Via E-mail and U S Mail*

Lisa A. Anderl  
Qwest Communications, Inc.  
1600 7th Avenue #3206  
Seattle, WA 98191

Re: *WUTC v. AdvancedTelecom Group, Inc., et al.*  
Docket No. UT-033011  
WUTC Staff Responses to Qwest Data Request Nos. 123-187

Dear Ms. Anderl:

Enclosed are Staff's responses to Qwest Data Request Nos. 123 through 187.

Very truly yours,

CHRISTOPHER G. SWANSON  
Assistant Attorney General

CGS:kl  
cc: All Parties (via e-mail only)

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 123:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 1 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

- a. Yes, according to ¶289 of the 39<sup>th</sup> Supplemental Order in Docket No. UT-003022 et al., the Commission became aware of the unfiled agreements after inadvertently receiving a copy of Qwest's response to a data request from Public Counsel. On March 28, 2002, the Commission issued Bench Request No. 46 to Qwest, requesting copies of the same agreements that Qwest had provided in response to Public Counsel's data request. Since April 17, 2002, Qwest has filed copies of the agreements it provided to Public Counsel, and has also provided numerous copies of other agreements that have not previously been filed with the Commission. Those agreements form the substance of the complaint and are listed exhaustively in Exhibits A and B of Order Number 05 in the instant matter.
- b. Yes, Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. See the response to a and b.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 124:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 2 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 125:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 3 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 126:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 4 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 127:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 5 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 128:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 6 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 129:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 7 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).
- d. Admit that this agreement (or portions thereof) was filed by Qwest with the Commission for approval on August 22, 2002 in Docket No. UT-980312.
- e. Admit that Staff is not aware of any CLEC opting into or attempting to opt into this agreement after August 22, 2002.
- f. If your answer to subparts d or e is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

- a-c. See response to 123, because the answer to this question would be the same as the answer to 123.
- d. Staff admits the agreement was filed as described.
- e. Staff is not aware of any CLEC opting into or attempting to opt into this agreement.
- f. See answer to "e."



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

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REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 130:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 8 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 131:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 9 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on March 8, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 132:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 10 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 2, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).
- d. Admit that this agreement (or portions thereof) was filed by Qwest with the Commission for approval on August 22, 2002 in Docket No. UT-023004.
- e. Admit that Staff is not aware of any CLEC opting into or attempting to opt into this agreement after August 22, 2002.
- f. If your answer to subparts d or e is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 129, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 133:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 12 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 2, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).
- d. Admit that this agreement (or portions thereof) was filed by Qwest with the Commission for approval on August 22, 2002 in Docket No. UT-990385.
- e. Admit that Staff is not aware of any CLEC opting into or attempting to opt into this agreement after August 22, 2002.
- d. If your answer to subparts d or e is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 129, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 134:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 16 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).
- d. Admit that this agreement (or portions thereof) was filed by Qwest with the Commission for approval on August 22, 2002 in Docket No. UT-980312.
- e. Admit that Staff is not aware of any CLEC opting into or attempting to opt into this agreement after August 22, 2002.
- f. If your answer to subparts d or e is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 129, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 135:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 17 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 136:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 18 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 137:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 19 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 138:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 20 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 139:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 21 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 140:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 23 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 141:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 25 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).
- d. Admit that this agreement (or portions thereof) was filed by Qwest with the Commission for approval on August 22, 2002 in Docket No. UT-980380.
- e. Admit that Staff is not aware of any CLEC opting into or attempting to opt into this agreement after August 22, 2002.
- f. If your answer to subparts d or e is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 129, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 142:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 26 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 143:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 27 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 144:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 28 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subpart a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 145:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 29 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 146:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 30 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 147:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 31 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 148:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 32 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 149:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 33 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 150:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 34 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 151:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 35 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).
- d. Admit that this agreement (or portions thereof) was filed by Qwest with the Commission for approval on August 22, 2002 in Docket No. UT-960323.
- e. Admit that Staff is not aware of any CLEC opting into or attempting to opt into this agreement after August 22, 2002.
- f. If your answer to subparts d or e is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 129, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 152:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 36 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 153:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 40 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).
- d. Admit that this agreement (or portions thereof) was filed by Qwest with the Commission for approval on August 22, 2002 in Docket No. UT-960356.
- e. Admit that Staff is not aware of any CLEC opting into or attempting to opt into this agreement after August 22, 2002.
- f. If your answer to subparts d or e is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 154:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 41 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart A or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 155:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 42 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart A or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).
- d. Admit that this agreement (or portions thereof) was filed by Qwest with the Commission for approval on August 22, 2002 in Docket No. UT-993007.
- e. Admit that Staff is not aware of any CLEC opting into or attempting to opt into this agreement after August 22, 2002.
- f. If your answer to subparts d or e is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 129, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 156:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 44 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart A or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 157:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 45 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart A or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 158:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 46 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart A or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 159:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 47 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart A or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 160:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 48 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 13, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 161:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 49 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 13, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 162:**

Please provide the following information with respect to the agreement attached as Exhibit A, Agreement No. 52 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC opting into this agreement after the date specified in subpart a or attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 163:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 1 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 164:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 2 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 2, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 165:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 3 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 2, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 166:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 4 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 2, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 167:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 5 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 2, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 168:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 6 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 169:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 7 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 170:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 8 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 171:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 9 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 172:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 10 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 173:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 11 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 174:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 12 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 175:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 13 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 176:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 14 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 177:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 15 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 16, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 178:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 16 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 179:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 17 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 180:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 18 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 181:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 19 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 182:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 20 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 183:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 21 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 184:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 22 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 11, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 185:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 23 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 13, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 186:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 24 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on June 24, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	July 19, 2004	WITNESS:	Thomas L. Wilson
CASE NO.:	UT-033011	RESPONDER:	Thomas L. Wilson
REQUESTER:	Qwest	TELEPHONE:	(360) 664-1282

**QWEST DATA REQUEST TO STAFF NO. 187:**

Please provide the following information with respect to the agreement attached as Exhibit B, Agreement No. 26 to Commission Order No. 05:

- a. Admit that this agreement was filed by Qwest with the Commission on May 9, 2002 in conjunction with Bench Request 46 in Docket Nos. UT-003022 and UT-003040.
- b. Admit that Staff is not aware of any CLEC after the date specified in subpart a attempting to opt into this agreement.
- c. If your answer to subparts a or b is other than an unqualified admission, state all facts and produce all documents supporting your answer(s).

**RESPONSE:**

See response to 123, because the answer to this question would be the same as the answer to 123.