

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 1: (BENCH REQUEST NO. 32)

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

ANSWER

Allegiance is most familiar with the “Coordinated Hot Cut (CHC) without Cooperative Testing” process. The “CHC without Cooperative Testing” option is requested via the Local Service Request (LSR). The hot cut usually takes place between 8a and 5p on the due date and within 30 minutes of the scheduled appointment time. Upon request and prior to the due date, Qwest will verify dial tone at the CFA and provide the results to the CLEC. The “Coordinated Hot Cut without Cooperative Testing” process is detailed in the Qwest Wholesale Product Catalog in the “Unbundled Local Loop – General Information – V38.0” section located at the following URL <http://www.qwest.com/wholesale/pcat/unloop.html#install>.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 2: (BENCH REQUEST NO. 33)

Please list each task that is part of Qwest's current hot cut process.

ANSWER.

In addition to the process identified in response to CLEC Question No. 1 (Bench Request No. 32), Allegiance performs the following tasks.

- Allegiance ports and triggers the telephone numbers in NPAC and activates the telephone numbers in the Allegiance switch.
- Allegiance calls the end-user customer to verify dial tone and all features are working correctly.
- If the end-user customer has dial tone Allegiance calls Qwest to accept the circuit(s).
- If the end-user customer does not have dial tone, Allegiance researches to determine the cause.
 - a. If the problem is determined to be an Allegiance problem, Allegiance opens an internal trouble ticket.
 - b. Once the problem is resolved, Allegiance calls Qwest to accept the circuit.
 - c. If the problem is determined to be a Qwest problem, Allegiance calls Qwest to report the problem.
 - d. Once Qwest resolves the problem, Allegiance accepts the circuit(s).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 2 (a): (BENCH REQUEST NO. 33 (a))

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

- (a) the average time it takes to complete the task;

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

ANSWER

Allegiance has not performed an analysis of the coordinated hot cut process nor conducted a study to determine the time associated with each task associated with Qwest's hot cut process.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 2 (b): (BENCH REQUEST NO. 33 (b))

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

(b) the typical occurrence of the task during the process;

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

ANSWER

Per the response to CLEC Question No. 2 (a) (Bench Request No. 33 (a)), Allegiance has not performed an analysis of the coordinated hot cut process nor conducted a study to determine the typical occurrence of the task during the hot cut process.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 2 (c): (BENCH REQUEST NO. 33 (c))

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

(c) the labor rate for the task;

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

ANSWER

Allegiance has not performed an analysis to determine the cost of the sub-tasks associated with a coordinated hot cut.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 2 (d): (BENCH REQUEST NO. 33 (d))

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

(d) the common overhead loading associated with the labor rate;

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

ANSWER

See response to CLEC Question No. 2 (c) (Bench Request No. 33 (c)).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 3: (BENCH REQUEST NO. 34)

Describe a batch hot cut process that you would implement to meet the FCC's requirement to establish a batch hot cut process. Please include an estimate of the maximum number of lines that should be processed in each batch.

ANSWER

Allegiance has not performed an analysis to recommend or suggest improvements to Qwest's establishment of a batch hot cut process.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 4 (a): (BENCH REQUEST NO. 35 (a))

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

- (a) the average time it takes to complete the task;

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

ANSWER

See response to CLEC Question No. 3 (Bench Request No. 34).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 4 (b): (BENCH REQUEST NO. 35 (b))

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

(b) the typical occurrence of the task during the process

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

ANSWER

See response to CLEC Question No. 3 (Bench Request No. 34).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 4 (c): (BENCH REQUEST NO. 35 (c))

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

(c) the labor rate for the task;

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

ANSWER

See response to CLEC Question No. 3 (Bench Request No. 34).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 4 (d): (BENCH REQUEST NO. 35 (d))

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

(d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

ANSWER

See response to CLEC Question No. 3 (Bench Request No. 34).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 5: (BENCH REQUEST NO. 36)

Beginning on January 1, 2003, please provide the average total cost per line that you incurred to manage and participate in Qwest's hot cut process, including, but not limited to, Qwest's non-recurring charges, for lines used to service residential and business mass-market customers in Qwest's service territory within Washington State. If the average total cost per line discussed above is different for residential and business mass-market customers, please identify the average total costs separately.

ANSWER

Allegiance objects to this question on the grounds that it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 6: (BENCH REQUEST NO. 37)

If the Commission determines that competitive carriers are not impaired without access to switching in the mass-market, please identify, by Qwest wire center in Washington State, what monthly volumes of hot cuts would be required within the first 12 months after the effective date of the decision: (a) to migrate existing UNE-P customers to UNE-L or another form of service, and (b) to connect new customers in the ordinary course of business. Please provide supporting documentation for these volume estimates.

ANSWER

At the present time, Allegiance does not purchase UNE-P lines in the state of Washington.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 7: (BENCH REQUEST NO. 38)

Please describe any circumstances in which you believe Qwest has performed deficiently in providing you with hot cuts in Washington State since January 1, 2003. Please provide a complete description of all facts that you rely upon as well as documents that support your assertion.

ANSWER

Allegiance has not documented any process or performance complaints regarding Qwest's performance in providing hot cuts to Allegiance in the state of Washington.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 8 (a): (BENCH REQUEST NO. 39 (a))

Please provide a list of all switches that you currently use, or those that you have used, or that you could use to provide a qualifying service (as defined in 47 C.F.R. § 51.5, as that section will be amended by the Final Rules issued by the FCC pursuant to the Triennial Review Order) anywhere in Washington state, regardless of whether the switch itself is located in the state. For each switch listed in response to this bench request, please provide the:

- (a) Physical location of each switch (*i.e.*, the street address);

ANSWER

Allegiance uses a single switch to service customers in the state of Washington and it is located at 1100 2nd Avenue, 1st Floor, Seattle, WA 98101.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 8 (b): (BENCH REQUEST NO. 39 (b))

(b) The 11-digit Common Language Location Identifier (CLLI) code of the switch as it appears in the Local Exchange Routing Guide (LERG) for Washington state; and

ANSWER

The 11-digit CLLI code of the Allegiance switch in the state of Washington is
STTMWAGVDS0.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 8 (c): (BENCH REQUEST NO. 39 (c))

(c) The LATA served by each switch.

ANSWER –

The LATA served by the Allegiance switch in the state of Washington is LATA 674.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 9: (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.

ANSWER

Allegiance owns the switch identified in response to CLEC Question No. 8 (Bench Request No. 39).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 10: (BENCH REQUEST NO. 41)

Please identify whether the information in the Local Exchange Routing Guide (LERG) for Washington State is current and accurate for the switches that you listed in response to 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.

ANSWER

The information in the LERG, including the CLLI code and the definition of the function of the switch, is current and accurate for the switch listed in response to CLEC Question No. 8 (Bench Request No. 39).

Docket No. UT-033044

In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order

CLEC QUESTION NO. 11(a): (BENCH REQUEST NO. 42(a))

For each switch listed in response to Bench Request No. 39, **excluding Qwest switches that you use on an unbundled basis in Qwest's service territory in Washington state or through the resale of Qwest's services at wholesale rates**, please provide:

- (a) The vertical and horizontal ("V&H") coordinates of the switch from the LERG;

ANSWER

For the switch listed in response to CLEC Question No. 8 (Bench Request 39), the V&H coordinates are 06337 / 08896.

Docket No. UT-033044

In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order

CLEC QUESTION NO. 11 (b): (BENCH REQUEST NO. 42 (b))

For each switch listed in response to Bench Request No. 39, **excluding Qwest switches that you use on an unbundled basis in Qwest's service territory in Washington state or through the resale of Qwest's services at wholesale rates**, please provide:

(b) The switch type (*e.g.*, Lucent 5ESS),

ANSWER

For the switch listed in response to CLEC Question No. 8 (Bench Request 39), the switch type is a Lucent Technologies 5ESS.

Docket No. UT-033044

In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order

CLEC QUESTION NO. 11(c): (BENCH REQUEST NO. 42(c))

For each switch listed in response to Bench Request No. 39, **excluding Qwest switches that you use on an unbundled basis in Qwest's service territory in Washington state or through the resale of Qwest's services at wholesale rates**, please provide:

(c) The function of the switch (*e.g.*, stand-alone, host, or remote);

ANSWER

For the switch listed in response to CLEC Question No. 8 (Bench Request 39), the function of the switch is stand-alone.

Docket No. UT-033044

In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order

CLEC QUESTION NO. 11 (f): (BENCH REQUEST NO. 42 (f))

For each switch listed in response to Bench Request No. 39, **excluding Qwest switches that you use on an unbundled basis in Qwest's service territory in Washington state or through the resale of Qwest's services at wholesale rates**, please provide:

(f) The initial cost of the switch, including installation and engineering costs; and

ANSWER

Allegiance objects to this question on the grounds that it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Docket No. UT-033044

In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order

CLEC QUESTION NO. 11 (g): (BENCH REQUEST NO. 42 (g))

For each switch listed in response to Bench Request No. 39, **excluding Qwest switches that you use on an unbundled basis in Qwest's service territory in Washington state or through the resale of Qwest's services at wholesale rates**, please provide:

(g) The number of initially equipped lines.

ANSWER

For the switch listed in response to CLEC Question No. 8 (Bench Request 39), the number of initially equipped lines was 24,192.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 15: (BENCH REQUEST NO. 46)

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 revenues earned per line served in Washington state by LATA, MSA, and wire center, and specify the source of those revenues by service type. The average total monthly revenue per line should include revenues associated with the basic retail price charged to the customer, vertical features, universal service payments, interstate access charges, intrastate access charges, subscriber line charges, toll, long distance, local number portability, data, service to Internet service providers, and line revenues derived from any other sources. Please provide any available breakdowns of each revenue component that is part of the average total revenue per line, identifying the type and amount of the revenue. Please identify any differences between types of customers served.

ANSWER

Allegiance objects to this question on the ground that it is overbroad, unduly burdensome and oppressive. Allegiance further objects to this question on the ground it is vague and ambiguous. This question seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence and is beyond the scope of the issues presented in this proceeding.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 16: (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.

ANSWER

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 18: (BENCH REQUEST NO. 49)

For each month beginning with January 1, 2003, please identify the monthly churn rate you have experienced in providing qualifying services to end user customers in Washington state. In answering this bench request, you should calculate the churn rate as the number of voice grade equivalent lines lost each month divided by the average number of voice grade equivalent lines in service each month. In calculating the churn rate, do not include customers who move but remain your customer.

ANSWER

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 20: (BENCH REQUEST NO. 51)

Please provide a list of all the Qwest wire centers in Washington state, identified by name, address, and CLLI code, to which you provide or offer transport facilities (*i.e.*, any facilities that, directly or indirectly, provide connections to wire centers) to other carriers.

For each such facility, please identify:

- (a) The type of transport facility (*i.e.*, DS0, DS1, DS3, dark fiber);
- (b) The transport technology used (*e.g.*, fiber optic (dark or lit), microwave, radio, or coaxial cable);
- (c) The level of capacity the facility is capable of supporting; and
- (d) The names of the other carriers.

ANSWER

Allegiance does not provide or offer transport facilities to other carriers in the state of Washington.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 21: (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.

ANSWER

Allegiance will provide the IRU contract upon request.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 24: (BENCH REQUEST NO. 55)

Please identify whether you are affiliated with Qwest in any way or with any other carrier (including intermodal providers) that serves the transport routes or connection points identified in response to Bench Request Nos. 50 and 53. If so, please describe the affiliation.

ANSWER

Allegiance is not affiliated with Qwest or any other carrier that serves the transport routes or connection points identified in response to CLEC Question Nos. 19 and 22 (Bench Request Nos. 50 and 53).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 25: (BENCH REQUEST NO. 56)

Please identify whether you have any long-term (10 or more years) dark fiber
Indefeasible Rights of Use (IRUs) between any two Qwest wire centers or other facilities
in the same LATA in Washington state, in which you maintain an active physical
collocation arrangement.

ANSWER

See response to CLEC Question No. 21 (Bench Request No. 52).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 26 (a): (BENCH REQUEST NO. 57 (a))

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;

ANSWER

See the response to CLEC Question No. 21 (Bench Request No. 52).

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 27: (BENCH REQUEST NO. 58)

Please provide a list of all recurring and non-recurring rate elements and rates that apply when a CLEC purchases UNE-L and special access, EEL, DS1, DS3, or dark fiber transport from a Qwest rate center to a CLEC rate center.

ANSWER

See attached for a list of recurring and non-recurring rate elements and rates that apply when Allegiance purchases UNE-L and special access, EEL, DS1, DS3, or dark fiber transport from a Qwest rate center to a CLEC rate center.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 28 (f): (BENCH REQUEST NO. 59 (f))

For each Qwest wire center in which you have a collocation arrangement, please identify:

- (f) The cost and capacity of each item of equipment identified above;

ANSWER (continued)

Allegiance objects to this request as overly broad and burdensome. Further the request is not designed to produce information leading to admissible evidence.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 30: (BENCH REQUEST NO. 61)

Please provide a list of all Qwest wire centers in Washington State, identified by name, address, and CLLI code, at which you connect a collocation arrangement to a facility or collocation arrangement belonging to another carrier, and for each connection, identify the carrier and the capacity or type of connection.

ANSWER

Allegiance does not have any direct facility connections to 3rd party carriers in the state of Washington.

Docket No. UT-033044
**In the Matter of the Petition of Qwest Corporation to Initiate a Mass Market
Switching and Dedicated Transport Case Pursuant to the Triennial Review Order**

CLEC QUESTION NO. 31: (BENCH REQUEST NO. 62)

Please provide a list of all Qwest wire centers in Washington State, identified by name, address, and CLLI code, at which you were denied the ability to connect a collocation arrangement to a facility or collocation arrangement or facility belonging to another carrier.

ANSWER

Allegiance has never been denied the ability to connect a collocation arrangement to a facility or collocation arrangement or facility belonging to another carrier.