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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Request for Competitive Classification
of Basic Business Exchange Telecommunications
Services

No. Docket UT-030614

**QWEST CORPORATION'S ANSWER
IN SUPPORT OF STAFF'S MOTION
REQUESTING THE COMMISSION TO
ORDER CLECS TO PRODUCE
INFORMATION**

Qwest Corporation ("Qwest") hereby files this answer in support of Staff's motion. Staff's motion asks the Commission to enter an order requiring that CLECs provide data to assist in the determination in this docket.

Qwest believes that the order requested by the motion is consistent with the Commission's authority under RCW 80.36.330(5) to obtain information relevant to the issues presented in this docket. This information is not otherwise available to Qwest, Commission Staff, or the Commission itself. While Qwest believes that it has presented compelling data regarding competition in its petition, that data does not include information about the customers served by CLECs over the CLECs' own facilities. That data may well be important in this case. To the extent that the Commission has access to this information, the Commission should not limit its considerations to the data Qwest is able to provide, but should base its decision on the most complete picture of the competitive market available. Nor should the Commission necessarily limit its consideration to those CLECs who have intervened in this case.

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Thus, Qwest supports Staff's motion. The Commission should enter an order requiring CLECs in Washington to provide answers to the three questions posed by Staff.

Dated this 17th day of June, 2003.

Qwest Corporation

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