

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Review of
Unbundled Loop and Switching Rates and
Review of the Deaveraged Zone Rate
Structure.

DOCKET NO. UT-023003

COMMISSION STAFF'S
RESPONSE IN SUPPORT OF
AT&T'S MOTION TO
COMPEL

1 The Commission Staff (Staff) supports the motion of AT&T Communications of
the Pacific Northwest, Inc. (AT&T) for an order compelling Qwest Corporation (Qwest)
to respond to its data request 001-002.

2 AT&T's data request 001-002 asks Qwest to produce information regarding the
location of Qwest's customers. This request is directly relevant to the issues in this
docket. The purpose of this proceeding is to update unbundled network element
(UNE) costs, including the UNE loop. The loop cost models currently use proxy data
for customer locations, which results in a certain amount of imprecision in the cost
estimates. The customer location information will reduce the amount of imprecision in
the cost estimates.

3 Qwest objected to AT&T's request on the grounds that the request is "overly
broad and that providing substantive responses would be unduly burdensome, and
would require an extensive, time-consuming and unduly expensive special study."

AT&T's Motion to Compel, Exhibit D. Qwest later provided line count information, but no customer location information. AT&T's Motion to Compel, at 2.

4 Commission Staff agrees with AT&T's arguments. The customer location information is probative of the cost of the loop. The probative value of this evidence outweighs the burdens that Qwest argues are associated with producing it.

5 In addition, Verizon already has produced the required information, and Qwest apparently has produced the information for the Arizona Commission. Therefore, Staff does not find Qwest's objection credible.

6 The Commission Staff supports AT&T's motion. The Commission should issue an order compelling Qwest to respond to AT&T's data request 001-002 within the next 4 weeks.

Dated: July 23, 2003.

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