

[Service Date July 29, 2003]

July 29, 2003

**NOTICE OF PREHEARING CONFERENCE TO ADDRESS AT&T'S
MOTION TO COMPEL DISCOVERY
(Set for August 1, 2003 at 9:30 a.m.)**

RE: In the Matter of the Review of Unbundled Loop and Switching Rates and
Review of the Deaveraged Zone Rate Structure
Docket No. UT-023003

TO THE PARTIES:

On July 14, 2003, AT&T filed a motion to compel discovery of Qwest. AT&T states that Qwest has refused to provide information regarding locations of its customers for use in within the HAI model. AT&T asserts that the Arizona Corporation Commission directed Qwest to provide such information in that jurisdiction.

Commission Staff supports AT&T's request for Qwest customer location information.

Qwest responds that AT&T's motion is untimely, that information similar to that provided in the Arizona proceeding is in a format different from that sought by AT&T, is unreliable and was not the type of information used by Qwest in developing its cost models for this proceeding.

NOTICE IS HEREBY GIVEN That a prehearing conference to address the motion is scheduled for Friday, August 1, 2003, at 9:30 a. m., in Room 108, Chandler Plaza Building, 1300 S. Evergreen Park Drive S.W., Olympia, Washington. If you are unable to attend the prehearing conference in person, you may attend via the Commission's teleconference bridge line, **360-664-3846.**

Please appear on the teleconference bridge five minutes before the conference is scheduled to begin.

Qwest and AT&T should be prepared to respond to the following questions:

1. Is Qwest able to provide AT&T the Washington-specific information on customer location, similar to that provided in the Arizona proceeding? Is such information capable of incorporation into the Hatfield Model? How soon could it be provided?
2. Other than information similar to the Arizona data, what information can Qwest provide on customer location that is more reliable than the default data available through the Hatfield Model?
3. What is the nature of the FCC universal service model data Qwest uses in its cost study?
4. In certain Qwest states, Qwest loop rates are based on where a customer resides relative to a wire center. What information sources are used to establish those distance sensitive rates? Can they be integrated into the Hatfield Model?
5. Could Qwest provide a sample of customer location data that would be used to adjust the HAI loop lengths?

Sincerely,

THEODORA M. MACE
Administrative Law Judge