

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	DOCKET NO. UT-030614
QWEST CORPORATION)	
)	Answer of Advanced TelCom, Inc.
For Competitive Classification of)	to Order Number 16
Business Basic Exchange)	
Telecommunications Services)	

1. The Commission has, in denying the Joint Motion of the moving parties, required the following:

The Commission recognizes that the lateness of the revisions makes it impossible for the parties to cross-examine the CLEC parties about them. However, it would be beneficial for the record to require ATG, MCI and Integra to provide to the Commission and the parties by October 17, 2003, answers to the following:

- A description of all criteria regarding analog and digital services that you applied when originally replying to Order No. 06;
- A description of all criteria regarding analog and digital services that you applied when revising the data you supplied in response to Order No. 6.

Since this information is not number-specific, it is not confidential.

2. Advanced TelCom, Inc. (ATG) answers as follows:

A. ATG was not a party to this case at the time that Orders Numbers 6 and 8 were entered. ATG was granted leave to intervene in this case by Order Number 11 on August 5, 2003, after Qwest opposed ATG's intervention.

B. ATG's response to Staff on July 17, 2003 was treated by ATG as a normal regulatory reporting function.

C. ATG responded to the Staff information by placing its business voice telecommunications services into the categories provided in the Staff worksheet.

Because no distinction was made there between digital and analog services, ATG

included its digital voice services. All of ATG's digital voice services appeared in a single category. See Declaration of Daniel Swanson, 10/03/03.

D. The criteria employed by ATG were whether a business voice service was delivered to the customer, and whether each service was most accurately described as PBX, basic business exchange lines or Centrex. Because no digital/analog distinction had been made in any materials or instructions provided, ATG included both. See Declaration of Daniel Swanson, 10/03/03.

E. Order Number 8 required Staff to follow up with all responding companies.

Commission Staff indicates it would be willing to contact the responding CLECs to determine that the line counts are accurate and exclude digital services.

Staff should ascertain that CLEC line counts are accurate, that they exclude digital services, and should include this information in its distribution to parties to the proceeding.

Commission Staff must ascertain whether CLECs have excluded digital services from the information they provide pursuant to Order No. 06 and must advise the parties whether and how they have done so.

F. ATG's reporting personnel received a follow-up call from Staff shortly after the entry of Order Number 8, approximately ten days before ATG's intervention was granted in this proceeding. That discussion is described in the Declaration of Daniel Swanson of October 3, 2003, which has been filed in connection with the Joint Motion. Staff asked ATG's reporting supervisor about some detail in the report, but did not mention any question or issue regarding whether digital voice lines had been included.

G. ATG's subsequent report and supporting declaration describe the differences in criteria and reporting. In its report delivered to Staff on October 3, 2003,

ATG provided the following response to these issues in the text of a (redacted) letter signed by Mr. Swanson and accompanied by a declaration, also signed by Mr. Swanson:

Based upon the instructions included in the docket, ATG provided counts for basic business exchange telecommunications, PBX and Centrex service for each wire center in the State of Washington, regardless of whether they were analog or digital services.

It has come to our attention during recent Commission hearings, indications were made that it was intended the CLECs were only to provide counts for analog services and that digital services (i.e., ISDN PRI and Digital Trunk Service) would be excluded from the calculations. As a clarification to ATG's initial response to the Commission, we had also included these digital products in the category of PBX trunks.

Based upon this new definition, we have re-evaluated the local line counts and determined that of the total XXXXXX PBX trunks that were reflected in our report, only XXXXXX of these were truly analog PBX trunks (Analog DID trunks). The remaining XXXXXX (XXXX %) were digital services.

3. ATG has reported the information requested of it by the Commission Staff to the best of its ability consistent with the instructions and criteria which it was given.

Respectfully submitted,

ADVANCED TELCOM, INC.

Dated: October 17, 2003

By its attorney:

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