

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)
) DOCKET NO. UT-030614
QWEST CORPORATION)
) AT&T'S CRITERIA
) REGARDING ITS RESTATED
For Competitive Classification of) RESPONSE TO STAFF'S
Basic Business Exchange) INFORMATION REQUESTS
Telecommunications Services.) IN ORDER NO. 6

AT&T Communications of the Pacific Northwest, Inc.; AT&T Local Services on behalf of TCG Seattle; and TCG Oregon (collectively "AT&T") hereby submit criteria regarding its restated response to Staff's information requests in Order No. 6.

CRITERIA

Criteria Employed Originally and to Restate Responses:

- A description of all criteria regarding analog and digital services that you applied when originally replying to Order No. 06;

AT&T employed the following criteria in its original response:

- (1) The traditional telephone network carried analog voice transmissions end-to-end across all elements of the network. Strictly speaking this constitutes analog service; however, very few, if any, networks employ end-to-end analog voice transmissions today.
- (2) AT&T's network is not an end-to-end analog network. Thus, true analog services may not, in fact, exist.
- (3) Because Staff, in requesting analog services, did not offer a definition, AT&T assumed that Staff would have to determine for itself, which of AT&T's services were "analog" in accordance with Staff's needs.
- (4) AT&T provided responses aimed at identifying all its services, including both "analog" and "digital" services. While some of AT&T's services are described as "analog," the description primarily reveals services that will operate over customer premises equipment ("CPE") that does not accommodate digital signals, but rather employs Dual Tone Multi-Frequency ("DTMF) signaling, ISDN-BRI or the like.

Nonetheless, some services described as analog may be provision employing digital technologies.

(5) In an effort to be helpful to the Staff, AT&T reduced its access line counts into DS-0 equivalents by NPA-NXX. This effort made all services, whether actually analog or digital, appear to be “analog” and more easily compared what might be considered “analog” under Staff’s definition.

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

AT&T employed the following criteria in restating its responses:

(1) During the hearing on September 16, 2003, Mr. Reynolds, on behalf of Qwest, defined analog services as follows:

I think it’s defined by the services that we provide or that we ask for competitive classification on in this docket. It’s the analog PBXs, the analog Centrex services, and the analog business services as that’s defined, and that is that we deliver an analog signal to the customer rather than a digital signal that’s integrated into the switch and also integrated into the CPE at the customer location. So that would probably be the differentiation between the types of services that we would—that we would call digital as opposed to those that we would call analog.¹

(2) While Mr. Reynold’s definition suffers from use of the very term it seeks to define (*i.e.*, “analog”), he provided some clue as to how Staff should have defined “analog.” That is, he stated “*we deliver an analog signal to the customer rather than a digital signal that’s integrated into the switch and also integrated into the CPE at the customer location.*”

(3) In restating its responses, AT&T has endeavored to employ the italicized portion of Mr. Reynold’s definition cited above. While AT&T cannot always be sure of meeting this definition with certainty as to the various customers employing the services it describes below, it is the best—and probably overstated—response that AT&T can provide without engaging in months and months of investigation.

¹ Transcript Vol. III at 111, ln. 14 – ln. 25.

Respectfully submitted this 17th day of October 2003.

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC. AND
AT&T LOCAL SERVICES ON
BEHALF OF TCG SEATTLE AND
TCG OREGON**

By: _____

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