

**REQUEST NO. 11**

Produce all documents that refer, relate to, or reflect AT&T and MCI's outside plant engineering practices or rules relating to: (1) methods for placing buried and underground plant (e.g., directional boring, plowing, and trenching), (2) the use of aerial, buried, and underground plant, and (3) the simultaneous placement of outside plant with other utility companies.

**RESPONSE NO. 11**

AT&T and MCI object to this data request as it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

**REQUEST NO. 14**

In building any local networks within the past three years, including in Washington, please state whether AT&T and MCI have been able to share the costs of placing buried, underground, and aerial plant with other utility companies. If AT&T and MCI have shared these costs, please state or describe:

- a) how often AT&T and MCI has been able to share the costs of placing each type of facility with other utility companies, providing an average sharing percentage for each type of plant;
- b) the identities of the utility companies with which AT&T and MCI have shared placement costs in Washington and other states;
- c) whether the frequency of sharing has varied depending on the population density of geographic areas and, if so, the relationship between density and sharing that AT&T and MCI have experienced (e.g., more or less sharing in low density areas); and
- d) whether AT&T and MCI have decreased placement costs by sharing the placement of facilities with other utility companies and, if so, the average cost savings AT&T and MCI have experienced for each type of plant (buried, underground, and aerial).

**RESPONSE NO. 14**

AT&T and MCI object to this data request as it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Moreover, the request is overly broad and unduly burdensome. To the extent any responsive information may exist, it is not maintained in the ordinary course of business in the manner described by the data request.

**REQUEST NO. 15**

Please produce all documents that refer or relate to any of the placement sharing experiences identified in response to Request No. 14.

**RESPONSE NO. 15**

See objection to Request No. 14.

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**REQUEST NO. 16**

In building any local networks within the past three years, including in Washington, please describe the frequency with which AT&T and MCI have used trenching, plowing, and directional boring to place cables, and quantify the frequencies by providing average percentages for each placement method (*e.g.*, on average, 33% of placements done via trenching, 33% via plowing, and 33% via directional boring).

**RESPONSE NO. 16**

AT&T and MCI object to this data request as it seeks information not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Moreover, the request is overly broad and unduly burdensome. To the extent any responsive information may exist, it is not maintained in the ordinary course of business in the manner described by the data request.

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**REQUEST NO. 17**

Please produce all documents that refer or relate to the frequency with which AT&T and MCI have used any of the placement activities identified in response to Request No. 16.

**RESPONSE NO. 17**

See objection to Request No. 16.

**REQUEST NO. 18**

Please identify, provide and separately list the average unit (per foot) price AT&T or MCI has paid in the past two years for any and all discrete sizes of fiber feeder cable ranging from 12 to 216 strands by populating the table below. Please include any/all discounts the company receives from its suppliers. Identify material costs and installation costs separately.

| Fiber Feeder Cable | Cable Size (fibers) |        |
|--------------------|---------------------|--------|
| Price(\$ per foot) | Underground         | Buried |
| 216                |                     |        |
| 144                |                     |        |
| 96                 |                     |        |
| 72                 |                     |        |
| 60                 |                     |        |
| 48                 |                     |        |
| 36                 |                     |        |
| 24                 |                     |        |
| 18                 |                     |        |
| 12                 |                     |        |

**RESPONSE NO. 18**

AT&T and MCI object to this data request as seeks information not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Moreover, the request is overbroad and unduly burdensome. To the extent any responsive information may exist, it is not maintained in the ordinary course of business in the manner described in the data request.

**REQUEST NO. 19**

Please identify, provide and separately list the unit (per foot) purchase price AT&T or MCI have paid in the past two (2) years for any and all discrete sizes of copper distribution cable and copper feeder cable ranging from 25 to 4200 wire pairs by populating the table below. Assume aerial cable investment represents non-armored cable with both aluminum and plastic jacketing and buried cable investment is for armored, single jacket filled cable. Please include any/all discounts that AT&T or MCI receives from its suppliers.

| Cable Size (wire Pairs) | Underground | Buried | Aerial |
|-------------------------|-------------|--------|--------|
| 4200                    |             |        |        |
| 3600                    |             |        |        |
| 3000                    |             |        |        |
| 2400                    |             |        |        |
| 1800                    |             |        |        |
| 1200                    |             |        |        |
| 900                     |             |        |        |
| 600                     |             |        |        |
| 400                     |             |        |        |
| 200                     |             |        |        |
| 100                     |             |        |        |
| 50                      |             |        |        |
| 25                      |             |        |        |

In addition, please complete the above cable costs matrix for the inputs to the HAI model.

**RESPONSE NO. 19**

AT&T and MCI object to this data request as it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Moreover, it is overly broad and unduly burdensome. To the extent any responsive information may exist, it is not maintained in the ordinary course of business in the manner described in the data request.

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**REQUEST NO. 22**

Please provide copies of all materials relating in any way to the HAI model that have been provided to AT&T and MCI by Taylor Nelson Sofres ("TNS"), including: (1) documents describing TNS' processes for geocoding customer locations, placing customers in surrogate locations when geocoding is not possible, and creating the customer locations used in the HAI model; (2) computer disks containing the customer clusters used in the HAI model and any other data used in the model; and (3) memoranda, correspondence, work papers, and notes from TNS relating in any way to the HAI model.

**RESPONSE NO. 22**

AT&T and MCI object to this data request because it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Moreover, it seeks information that is not in the possession, custody or control of AT&T and MCI. AT&T and MCI also object to the extent that information requested is subject to the attorney client privilege or work product doctrine. Subject to and without waiver of this objection, AT&T and MCI respond as follows:

- (1) Please refer to the HAI Model Description, Section 5.4, for a description of the geocoding process. For HM 5.3 in Washington, the customer locations with an exact geocode match from the original TNS geocoding process were retained in the model. However, surrogate customer locations were updated and targeted based on Qwest's wire center specific line counts.
- (2) The ClusterData used by the HAI Model is included with the HAI Model and can be viewed in the HM.mdb access database.
- (3) TNS did not participate in the development of the HAI Model. TNS is a third party vendor that supplied the clustered customer locations used by the HAI Model.



**REQUEST NO. 24**

Please provide copies of any algorithms or software programs that are used to create the customer clusters in the HAI model, including: (1) any algorithms or software programs used in the geocoding, surrogating, or clustering processes; and (2) the "National Access Line Model" that is used to determine the number of lines for each customer location included in HAI.

**RESPONSE NO. 24**

AT&T and MCI object to this data request on the ground that such information is not in the possession, custody or control of AT&T and MCI or their witnesses. The algorithms and software programs used to derive customer locations are the intellectual property of Taylor-Nelson-Sofres Telecom (TNS). Qwest may contact TNS to request this information.

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**REQUEST NO. 27**

Please produce all customer location data used in the version of the HAI model presented in this case and all other data that relate in any way to the creation of the clusters that are used in the model.

**RESPONSE NO. 27**

AT&T and MCI object to this data request on the ground that such information is not in the possession, custody or control of AT&T and MCI or their witnesses. Any data used to derive customer locations are the intellectual property of Taylor-Nelson-Sofres Telecom (TNS). Qwest may request the information from TNS.

**REQUEST NO. 32**

With respect to Section 5.3 of the HAI Model Description, please identify, explain and provide the following:

- a) A list of each Washington CBG where Claritas household counts exceed the Washington customer location count;
- b) The number of Claritas households in excess of Metromail customer locations for each CBG; and
- c) For the residential households in excess of the Metromail customer locations, the CB identification numbers and the household count where these excess households were distributed.

**RESPONSE NO. 32**

AT&T and MCI object to this data request on the ground that such information is not in the possession, custody or control of AT&T or MCI or their witnesses. The information requested in this data request is the intellectual property of Taylor-Nelson-Sofres Telecom (TNS). Qwest may request this information from TNS.

**REQUEST NO. 44**

Please identify all contractors AT&T and MCI have used in Washington within the past three years to place fiber optic or copper facilities.

**RESPONSE NO. 44**

AT&T and MCI object to this data request as it seeks information not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Moreover, it is overly broad and unduly burdensome. To the extent any responsive information may exist, it is not maintained in the ordinary course of business in the manner described by the data request.

**REQUEST NO. 45**

Please identify any areas in Washington where AT&T and MCI or any AT&T and MCI affiliate has built or installed network facilities within the past three years. For each area, describe the types of facilities that have been installed.

**RESPONSE NO. 45**

AT&T and MCI object to this data request as it is overly broad, unduly burdensome and seeks information not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Moreover, it is overly broad and unduly burdensome. To the extent any responsive information may exist, it is not maintained in the ordinary course of business in the manner described by the data request.