

U S WEST COMMUNICATIONS

STATE: Washington
DOCKET NO: UT-991358
CASE DESCRIPTION: U S WEST/Qwest Merger; Qwest Petition to Terminate Service Quality Performance Plan
INTERVENOR: Record Requisition
REQUEST NO: Record Requisition 01-003

REQUEST:

Provide a supplemental response stating the net change of functional employees by category shown on exhibit 29C pages 3-4 (this is attachment A to Qwest's response to Public Counsel data request 12-126).

RESPONSE:

This record requisition arose as a result of questions in connection with Public Counsel's Illustrative Cross Examination Exhibit 31C. Exhibit 31C contains tables reflecting data Qwest's supplemental response to PC Data Request No. 126 and PC No. 129 in an effort to illustrate the net change/reduction in the total number of Qwest employees in Washington between 2001 and 2003. This illustration reflects 315 (2437 minus 2122 = 315) more employees as of December 31, 2003 than stated in Qwest's response to PC Data Request No. 129. (The total number of employees terminated as reflected in Table A, column B of this illustrative exhibit is shown as 3792 - this is an error, the calculation should be 3712. However, as explained below, neither number reflects the actual number of QC employees terminated in 2001, 2002, and 2003 and this number is therefore not properly used in the comparison.)

The data associated with Qwest's supplemental response to Data Request No.126 (Exhibit 29C and Table A of Exhibit 31C) reflected terminations and new hires for all Qwest entities in Washington, not just Qwest Corporation (QC) as reflected in Qwest's Data Response No. 129. The total number of QC employees terminated in 2001, 2002 and 2003 is 3,650. The total number of QC new hires for the same period is 1,221. When comparing the total number of QC Washington-based employees as of December 31, 2003 (5059) against the net change of terminated employees and new hires there is a difference of 8 employees (7496 - 3650 + 1221 = 5067; 5067 - 5059 = 8). This small difference may be associated with timing differences within the Human Resource Information System data base, etc.

Respondent: Holly Dean

CORRECTED RESPONSE DATED 6/15/04:

Qwest confirms that the data in exhibit 29C shows net change in employees due to new hires and terminations for each year. This data does not show changes due to employees who transfer into or out of Washington.

At this time Qwest does not have all of the data responsive to this request. In discussions with Public Counsel, Qwest has learned that one of Public Counsel's priorities was to learn the net change in employees in the Local Network organization. With regard to the change in the number of Washington employees in the Local Network organization, Qwest provides the information in Confidential Attachment A. This information amends the response to data request 12-126.

Respondent: Holly Dean