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March 9, 2007

**Via E-mail and Overnight Delivery**

Carole Washburn  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
Olympia, WA 98504-7250

**RE: Docket Number – UT-061625 *In the Matter of Qwest's Petition for Approval of an Alternative Form of Regulation in Accordance with RCW 80.36.135*  
Qwest's second revised Supplemental Response to Bench Request No. 3**

Dear Ms. Washburn:

Enclosed are an original and fifteen copies of Qwest's second revised Supplemental Response to Commission Bench Request No. 3 in the above-referenced docket.

Yesterday, Qwest sent you Confidential Attachments H and I in its revised response to the data requested in the 2<sup>nd</sup> column of the Commission form regarding *Qwest Retail Access Lines with DSL Capability*. Qwest has since become aware that Confidential Attachment H was incorrect. Qwest apologizes for any inconvenience that this may have caused. The attached file contains corrected Confidential Attachment H which contains the correct data for 2005.

If you have any questions regarding this serving, I can be reached at (303) 383-6679.

Sincerely,

A handwritten signature in black ink that reads "Kathy Rowley". The signature is written in a cursive, flowing style.

Kathy Rowley  
Lead Paralegal/Interrogatory Manager

Encl:

cc: Lisa Anderl  
Attached service list


**CERTIFICATE OF SERVICE**

**Docket No. UT-061625**

I certify that I have caused to be served a copy of Qwest's **second revised** Supplemental Response to Bench Request No. 3 to the following parties via e-mail and Overnight Delivery:

|  |  |
|--|--|
| <b>WEBTEC</b><br>Arthur Butler*<br>Ater Wynne, LLP<br>601 Union Street, Suite 5450<br>Seattle, WA 98101-2327<br>Phone: (206) 623-4711<br>Fax: (206) 467-8406<br>E-Mail: aab@aterwynne.com  | <b>PUBLIC COUNSEL</b><br>Simon J. ffitich*<br>Public Counsel Section<br>Office of Attorney General<br>800 Fifth Avenue, Suite 2000<br>Seattle, WA 98104-3188<br>E-Mail: simonf@atg.wa.gov    |
| <b>Washington Utilities and Transportation Commi</b><br>Gregory J. Trautman*<br>Assistant Attorney General of Washington<br>Utilities and Transportation Division<br>1400 S. Evergreen Park Drive SW<br>P.O. Box 40128<br>Olympia, WA 98504-0128<br>E-Mail: gtrautma@wutc.wa.gov | <b>Northwest Public Communications Council</b><br>David L. Rice*<br>Miller Nash LLP<br>4400 Two Union Square<br>601 Union St.<br>Seattle, WA 98101-2352<br>E-Mail: david.rice@millernash.com |

DATED this 9<sup>th</sup> day of March 2007.

  
Marie Moya

\*Executed Protective Agreement

INTERVENOR: Bench Requests

REQUEST NO: 003S1-SECOND REVISED

Please provide a more complete record of the status of Qwest's investment, particularly in Digital Subscriber Line (DSL) infrastructure (see Prefiled Rebuttal Testimony of Mark S. Reynolds, page 11 and 23-24 and Exhibits MSR-5 page 2 and MSR-6 page 2; the Prefiled Rebuttal Testimony of David L. Teitzel, pages 9-13 and 17-18; and the Prefiled Rebuttal Testimony of Dr. William E. Taylor, pages 14-15 and 32-33). Please complete the following chart on a total state basis for the years: 2000, 2001, 2002, 2003, 2004, 2005 and 2006.

|    | State        | YE <sup>1</sup><br>Qwest<br>Retail<br>Access<br>Lines | YE Qwest<br>Retail<br>Access<br>Lines with<br>DSL<br>Capability | Qwest<br>Revenues | Qwest Capital<br>Expenditures |
|----|--------------|---|---|-------------------|-------------------------------|
| 1  | Arizona      |   |   |                   |                               |
| 2  | Colorado     |   |   |                   |                               |
| 3  | Idaho        |   |   |                   |                               |
| 4  | Iowa         |   |   |                   |                               |
| 5  | Minnesota    |   |   |                   |                               |
| 6  | Montana      |   |   |                   |                               |
| 7  | Nebraska     |   |   |                   |                               |
| 8  | New Mexico   |   |   |                   |                               |
| 9  | North Dakota |   |   |                   |                               |
| 10 | Oregon,      |   |   |                   |                               |
| 11 | South Dakota |   |   |                   |                               |
| 12 | Utah         |   |   |                   |                               |
| 13 | Washington   |   |   |                   |                               |
| 14 | Wyoming      |   |   |                   |                               |

RESPONSE:

See Confidential Attachments A-G (on cd) which contain the requested data for

2000, 2001, 2002, 2003, 2004, 2005 and 2006, with the exception of the column titled "YE Qwest Retail Access Lines with DSL Capabilities".

Qwest will supplement its response to this request on March 7, 2007 with 2005 and 2006 data only as it relates to "YE Qwest Retail Access Lines with DSL Capabilities". Qwest is continuing to research whether data for 2000, 2001, 2002, 2003 and 2004 exists and will provide it at a later date if it becomes available.

Respondent: Dave Teitzel, Kevin MacWilliams and Ryan Gallagher

**SUPPLEMENTAL RESPONSE DATED 03/07/07 :**

See Confidential Attachments H and I which contain "YE Qwest Retail Access Lines with DSL Capabilities" for 2005 and 2006.

Respondent: Ryan Gallagher

**SUPPLEMENTAL RESPONSE DATED 03/08/07 :**

See revised Confidential Attachments H and I.

Respondent: Ryan Gallagher

**SUPPLEMENTAL RESPONSE DATED 03/09/07 :**

See second revised Confidential Attachment H.

Respondent: Ryan Gallagher

|    | State        | 12/05<br>Living Units with<br>a Working<br>10-Digit<br>Telephone Number | Number of Living<br>Units With a Working<br>Telephone Number<br>That Currently<br>Qualify For DSL | Qwest<br>Revenues | Qwest Capital<br>Expenditures |
|----|--------------|---|---|-------------------|-------------------------------|
| 1  | Arizona      |   |   |                   |                               |
| 2  | Colorado     |   |   |                   |                               |
| 3  | Idaho        |   |   |                   |                               |
| 4  | Iowa         |   |   |                   |                               |
| 5  | Minnesota    |   |   |                   |                               |
| 6  | Montana      |   |   |                   |                               |
| 7  | Nebraska     |   |   |                   |                               |
| 8  | New Mexico   |   |   |                   |                               |
| 9  | North Dakota |   |   |                   |                               |
| 10 | Oregon,      |   |   |                   |                               |
| 11 | South Dakota |   |   |                   |                               |
| 12 | Utah         |   |   |                   |                               |
| 13 | Washington   |   |   |                   |                               |
| 14 | Wyoming      |   |   |                   |                               |
|    |              |   |   |                   |                               |
|    |              |   |   |                   |                               |
|    |              |   |   |                   |                               |
|    |              |   |   |                   |                               |

Notes: Living unit is defined as a residence or business location.