

QWEST CORPORATION

STATE: Washington

DOCKET NO: UT-030614

CASE DESCRIPTION: Request for Competitive Classification of Basic Business Exchange Telecommunications Services

INTERVENOR: Bench Requests

REQUEST NO: BCH 02-005

REQUEST:

Identify whether there are any services listed in Exhibit 2, at least in whole or in part, which are classified by Qwest as digital services, and, if so: (1) list those services or pieces or parts of the services; and (2) state whether Qwest is seeking competitive classification for such services.

RESPONSE:

Consistent with its Petition and representations made by its witnesses in this docket, Qwest is not seeking competitive classification for any digital services in this docket. The criteria Qwest has applied to determine whether a service is digital or analog is whether the signal delivered to the customers premises equipment (CPE) is digital or analog. That is, analog CPE requires an analog signal and the services in Qwest's Petition comprise the analog business exchange services it offers to customers with analog CPE.

In Exhibit 2, Qwest lists the basic business exchange services for which it is seeking competitive classification. Some of the categories listed include both digital and analog sub-categories.¹ For example, both Centrex 21 and Centrex Prime have both analog and digital service options. Exhibit 2 also provides a list of services that are explicitly excluded from the Petition and digital services are included on this list. Consequently, the digital service options for any of the services categories would be excluded from Qwest's Petition. To be clear, Qwest is not seeking competitive classification for Centrex 21 - I (ISDN), and Centrex Prime - I (ISDN), both of which are digital services. Also, Qwest is not seeking competitive classification for the digital variations of PBX or Tenant Solutions.²

In the confidential response to Public Counsel data request 08-039 (attached to this response as Confidential Attachment A), Qwest lists the retail line counts for the sub-categories of services that comprise its filing. Upon investigation, Qwest has determined that it included Centrex 21 - I (ISDN) and Centrex Prime - I (ISDN) in its retail line counts; those should have been excluded. Because of the small number of lines associated with these services, they do not have a material impact on the market share calculation and their inclusion does not benefit Qwest's case, as it results in a higher Qwest market share. These were the only digital service lines that were inadvertently included in Qwest's retail line counts (none were included for PBX or Tenant Solutions) and no digital service lines were included in Qwest's wholesale line counts.

¹ PBX, Centrex, and Tenant Solutions all have digital service options.

² If competitively classified in this proceeding, Tenant Solutions would not include the following services: DIGICOM I service; DIGICOM II service; Centrex 21 ISDN; Single Line ISDN service; Primary Rate Service (PRS) ISDN; High Capacity DS1 and DS3 services; Digital Switched Services; Frame Relay Service; or Uniform Access Solution service.