

Docket No. UT-063061
Eschelon Telecom of Washington, Inc. Answer
To Qwest's Petition for Reconsideration
Attachment 2

Excerpt from the Direct Testimony of Teresa K. Million

1 place an unfair burden on Qwest, especially when Qwest already has systems and
2 identifiers in place to track existing private line services.

3
4 **Q. IS IT TRUE THAT WHEN QWEST ORIGINALLY CONVERTED CLECS’**
5 **PRIVATE LINE CIRCUITS TO UNES, THEY WERE ALLOWED TO**
6 **KEEP THEIR PRIVATE LINE CIRCUIT IDS?**

7 A. Yes. However, this was so only because those CLECs objected to Qwest’s efforts
8 to convert those private line circuit IDs to circuit IDs representing UNE products.
9 Qwest only offered that option on a very limited basis for embedded circuits
10 ordered before April 2005. The reason for discontinuing that practice in 2005
11 was that Qwest discovered that, after allowing the circuit IDs to remain
12 unchanged initially, it was experiencing difficulty in managing the large number
13 of circuits. Further, Qwest was incurring a substantial amount of expense on the
14 resources necessary to manually track those circuits individually outside of
15 Qwest’s systems. This tracking is necessary in order for Qwest to maintain its
16 subsidiary records accurately so that maintenance and repairs on those circuits
17 could be handled out of the appropriate service centers. Therefore, as of April
18 2005, that option is no longer available, and thus, any circuit additions or changes
19 made to circuits after that date are required to change circuit IDs as well.
20 Currently, there are fewer than 7% of all DS1 and DS3 UNEs that still have
21 private line circuit IDs. Qwest has accounted for those circuits in its conversion
22 cost study, and thus does not include activities, or the associated costs, triggered
23 by a change of circuit ID for those “grandfathered” circuits in its conversion
24 costs.

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