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January 12, 2004

## VIA OVERNIGHT DELIVERY

Ms. Carole J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive, S.W.  
Olympia, WA 98504

**Re: Docket No. UT-033044: In the Matter of Qwest Corporation  
To Initiate a Mass-Market Switching and Dedicated Transport Case  
Pursuant to the Triennial Review Order**

Dear Ms. Washburn:

On behalf of ICG Telecom Group, Inc. ("ICG"), enclosed please find ICG's responses to the Commission's Information Requests in the above-referenced proceeding.

Please data stamp and return the enclosed extra copy of this filing in the enclosed self-addressed, postage-prepaid envelope. Should you have any questions concerning these responses, please do not hesitate to contact the undersigned.

Sincerely,



Tamar E. Finn  
Michael P. Donahue

Counsel for ICG Telecom Group, Inc.

cc: Records Center (via e-mail)  
Scott Beer  
Andrea Guzman

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	Docket No. UT-033044
	)	
QWEST CORPORATION	)	
	)	
To Initiate a Mass-Market	)	
Switching and Dedicated Transport	)	
Review Order	)	

**ICG TELECOM GROUP, INC. RESPONSE**  
**TO ORDER REQUIRING DISCLOSURE OF INFORMATION**

ICG Telecom Group, Inc. (“ICG”), through undersigned counsel hereby submits its responses to the Washington State Utilities and Transportation Commission’s (“Commission”) October 23, 2003 Order Requiring Disclosure of Information. A number of the responses include Confidential Information. ICG has identified those responses and is filing the responses in accordance with the Protective Order in this proceeding. ICG respectfully requests that this information not be made a part of the public record or otherwise disclosed.

**GENERAL OBJECTIONS**

ICG makes the following general objections to the Information Requests:

1. ICG objects to the Information Requests to the extent that they are overly broad, that they are unduly burdensome and oppressive, and in that they are excessively time consuming and expensive.

2. ICG objects to the Information Requests to the extent they seek irrelevant information and are not reasonably calculated to lead to the discovery of admissible evidence. In that regard, ICG objects, among other things, to interrogatories that seek information that is unrelated to or inconsistent with the methodology and parameters of the analysis of impairment prescribed by the FCC in its Triennial Review Order. By way of illustration of this objection, and without limiting its right to identify other examples of discovery requests that are

objectionable on this basis, ICG objects to items that relate to its individual revenues, costs, profitability, financial criteria, means and strategies of entering particular markets, and other financial and strategic aspects of its operations, on the grounds that the FCC ruled in the Triennial Review Order that the impairment analysis is not to be based on business models of particular individual carriers.

3. ICG objects to the Information Requests to the extent they are vague, ambiguous, imprecise, and utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these items.

4. ICG objects to the Information Requests to the extent that they purport to impose discovery obligations on ICG that exceed the scope of discovery allowed by the applicable Washington Rules of Civil Procedure and the Commission's Rules. By way of illustration and not limitation, ICG objects to requests for documents that would require ICG to create information or a document that does not exist or prepare information in a manner in which ICG does not maintain it.

5. ICG objects to the Information Requests to the extent that they seek discovery of materials and/or information protected by the attorney/client privilege, the work product doctrine, the accountant/client privilege, and any other applicable privilege.

6. ICG objects to Information Requests to the extent that they would require disclosure of information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed (provided the information is otherwise discoverable) only pursuant to the terms of a mutually acceptable confidentiality agreement and use of the Commission's rules and procedures relating to confidential and proprietary information.

7. ICG objects to all Information Requests which would require ICG to provide information which is already in the Commission's possession or is in the public record before the Commission. To require ICG to duplicate information that the Commission already has or is readily available to Commission would be unduly burdensome and oppressive.

8. ICG objects to the Information Requests to the extent they seek to impose an obligation on ICG to respond on behalf of subsidiaries and/or former officers, employees, agents, and directors on the grounds that such requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

9. ICG will interpret each request as relating to intrastate Washington operations within the service area of Qwest Corporation. To the extent any request is not intended to relate to Washington intrastate operations within these service areas, ICG objects to such request as overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

10. ICG objects to requests that seek information that is not in ICG's possession or is not available in the form requested and thus would require ICG to perform a special study and are therefore unduly burdensome.

11. ICG objects to requests for documents that require the identification or production of "all," "every," or "any" information on documents as overbroad and unduly burdensome.

In addition to these General Objections, ICG is including specific objections in its responses to the Information Requests to the extent necessary. Subject to and without waiving its General Objections, ICG is responding to the Information Requests as set forth below.

## **RESPONSES**

### **CLEC QUESTION NO. 1: (Bench Request No. 32)**

Describe the hot cut process currently used to transfer lines from Qwest switches to your facilities.

**Response:** ICG provides data-only services to its customers in Washington. ICG has a switch in Washington, but does not provide local voice telecommunications services to end users and does not offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Consequently, ICG does not utilize Qwest's hot cut process to transfer lines from Qwest to ICG's facilities. Therefore, CLEC Question Nos. 2 through 7 are not applicable.

**CLEC QUESTION NO. 2: (Bench Request No. 33)**

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

- (a) the average time it takes to complete the task;
- (b) the typical occurrence of the task during the process;
- (c) the labor rate for the task; and
- (d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

**RESPONSE:** As noted in response to CLEC Question No. 1, ICG does not utilize Qwest's hot cut process. Therefore, this question is not applicable.

**CLEC QUESTION NO. 3: (Bench Request No. 34)**

Describe a batch hot cut process that you would implement to meet the FCC's requirement to establish a batch hot cut process. Please include an estimate of the maximum number of lines that should be processed in each batch.

**RESPONSE:** As noted in response to CLEC Question No. 1, ICG does not utilize Qwest's hot cut process. Therefore, this question is not applicable.

**CLEC QUESTION NO. 4: (Bench Request No. 35)**

Please list each task that is part of the batch cut process described in your response to CLEC Question No. 3, above. For each task, please provide the following information:

- (a) the average time it takes to complete the task;
- (b) the typical occurrence of the task during the process;
- (c) the labor rate for the task; and
- (d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

**RESPONSE:** As noted in response to CLEC Question No. 1, ICG does not utilize Qwest's hot cut process. Therefore, this question is not applicable.

**CLEC QUESTION NO. 5: (Bench Request No. 36)**

Beginning on January 1, 2003, please provide the average total cost per line that you incurred to manage and participate in Qwest's hot cut process, including, but not limited to, Qwest's non-recurring charges, for lines used to service residential and business mass-market customers in Qwest's service territory within Washington State. If the average total cost per line discussed above is different for residential and business mass-market customers, please identify the average total costs separately.

**RESPONSE:** As noted in response to CLEC Question No. 1, ICG does not utilize Qwest's hot cut process. Therefore, this question is not applicable.

**CLEC QUESTION NO. 6: (Bench Request No. 37)**

If the Commission determines that competitive carriers are not impaired without access to switching in the mass-market, please identify, by Qwest wire center in Washington State, what monthly volumes of hot cuts would be required within the first 12 months after the effective date of the decision: (a) to migrate existing UNE-P customers to UNE-L or another form of service, and (b) to connect new customers in the ordinary course of business. Please provide supporting documentation for these volume estimates.

**RESPONSE:** As noted in response to CLEC Question No. 1, ICG does not utilize Qwest's hot cut process. Therefore, this question is not applicable.

**CLEC QUESTION NO. 7: (Bench Request No. 38)**

Please describe any circumstances in which you believe Qwest has performed deficiently in providing you with hot cuts in Washington State since January 1, 2003. Please provide a complete description of all facts that you rely upon as well as documents that support your assertion.

**RESPONSE:** As noted in response to CLEC Question No. 1, ICG does not utilize Qwest's hot cut process. Therefore, this question is not applicable.

**CLEC QUESTION NO. 8: (Bench Request No. 39)**

Please provide a list of all switches that you currently use, or those that you have used, or that you could use to provide a qualifying service (as defined in 47 C.F.R. § 51.5, as that section will be amended by the Final Rules issued by the FCC pursuant to the Triennial Review Order) anywhere in Washington state, regardless of whether the switch itself is located in the state. For each switch listed in response to this bench request, please provide the:

- (a) Physical location of each switch (*i.e.*, the street address);
- (b) The 11-digit Common Language Location Identifier (CLLI) code of the switch as it appears in the Local Exchange Routing Guide (LERG) for Washington state;  
and
- (c) The LATA served by each switch.

**Response:** ICG objects to this request on the grounds that it seeks irrelevant information and is not reasonably calculated to lead to the discovery of admissible information. ICG has one switch in Washington; however, ICG provides data-only services to its customers and does not provide

local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. The FCC stated in the Triennial Review Order that, for purposes of the states' circuit switching for mass market analysis, "mass market customers are analog voice customers that purchase only a limited number of POTS lines, and can only be economically served via DS0 loops." (Triennial Review Order, at para. 497). In addition, the FCC stated that, "the identified competitive switch providers should be actively providing voice service to mass market customers in the market." (Triennial Review Order, at para. 499). Because ICG does not provide local voice telecommunications services in Washington, any information regarding ICG is not relevant to the Commission's analysis in this proceeding. Therefore, CLEC Question Nos. 9 through 18 are not applicable.

**CLEC QUESTION NO. 9: (Bench Request No. 40)**

For each of the switches identified in your response to CLEC Question No. 8, please state whether you own the switch, lease the switching capacity, use the switch on an unbundled or resale basis, or otherwise have obtained the right to use the switch on some non-ownership basis. If you do not own the facility, please identify (a) the entity owning the switch and, if different than the owner of the switch, the entity with which you have entered into the lease or other arrangement, (b) the nature of the arrangement, and (c) whether the entity or entities are affiliates of yours, in the sense defined in paragraph 408, footnote 1263, of the Triennial Review Order.

**Response:** ICG objects to this request to the extent it seeks highly confidential, commercially sensitive information. Subject to and without waiving that objection, ICG states that, as noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 10: (Bench Request No. 41)**

Please identify whether the information in the Local Exchange Routing Guide (LERG) for Washington state is current and accurate for the switches that you listed in response to CLEC Question No. 8. If any of the information is not accurate, please identify the inaccurate information and provide corrected information, including any additions, deletions or changes. As part of your review of the information in the LERG, please state whether the CLLI code is accurate for each switch that you identified in response to CLEC Question No. 8. In addition, please state whether the LERG definition of the function of each switch (*i.e.*, tandem, end office, etc.) is accurate.

**Response:** As noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 11: (Bench Request No. 42)**

For each switch listed in response to CLEC Question No. 8, **excluding Qwest switches that you use on an unbundled basis in Qwest’s service territory in Washington state or through the resale of Qwest’s services at wholesale rates**, please provide:

- (a) The vertical and horizontal (“V&H”) coordinates of the switch from the LERG;
- (b) The switch type (*e.g.*, Lucent 5ESS),
- (c) The function of the switch (*e.g.*, stand-alone, host, or remote);
- (d) The switch capacity (*i.e.*, the maximum number of voice-grade equivalent lines it is capable of serving);
- (e) The geographic area over which you provide qualifying service to end-user customers with the switch;
- (f) The initial cost of the switch, including installation and engineering costs; and
- (g) The number of initially equipped lines.

**Response:** As noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 12: (Bench Request No. 43)**

For each switch identified in your response to CLEC Question No. 11, please provide a list of all the Qwest wire centers in Washington state, identified by name, address, and CLLI code, for which you are currently using that switch to provide qualifying service to any end user customers.

**Response:** As noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 13: (Bench Request No. 44)**

For each Qwest wire center identified in response to CLEC Question No. 12, please identify the total number of voice-grade equivalent lines that you are providing to customers in that wire center from each switch identified in response to CLEC Question No. 11. For purposes of this question, “voice-grade equivalent lines” should be defined consistently with the FCC’s use of the term. *See, e.g., FCC Form 477, Instructions for the Local Competition and Broadband Reporting Form.*

**Response:** ICG objects to this request to the extent that it would require ICG to perform a special study. Subject to and without waiving that objection, ICG states that its systems are not designed to determine this information. As noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local



circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 14: (Bench Request No. 45)**

With respect to the voice-grade equivalent lines identified in your response to CLEC Question No. 13, please separately indicate the number being provided to (a) residential customers; (b) business customers to whom you provide between 1-3 voice-grade equivalent lines at one location; (c) business customers to whom you provide between 4-24 voice-grade equivalent lines at one location; and (d) business customers to whom you provide 25 or more voice-grade equivalent lines (in one location).

**Response:** ICG objects to this request to the extent that it would require ICG to perform a special study. Subject to and without waiving that objection, ICG states that its systems are not designed to determine this information. As noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 15: (Bench Request No. 46)**

With respect to the lines identified in your response to CLEC Question No. 13, please provide, beginning with January 1, 2003, the average total monthly revenues earned per line served in Washington state by LATA, MSA, and wire center, and specify the source of those revenues by service type. The average total monthly revenue per line should include revenues associated with the basic retail price charged to the customer, vertical features, universal service payments, interstate access charges, intrastate access charges, subscriber line charges, toll, long distance, local number portability, data, service to Internet service providers, and line revenues derived from any other sources. Please provide any available breakdowns of each revenue component that is part of the average total revenue per line, identifying the type and amount of the revenue. Please identify any differences between types of customers served.

**Response:** ICG objects to this request on the grounds that it seeks highly confidential, commercially sensitive information. ICG further objects to this request to the extent that it would require ICG to perform a special study. Subject to and without waiving that objection, ICG states that its systems are not designed to determine this information. As noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 16: (Bench Request No. 47)**

With respect to the lines identified in your response to CLEC Question No. 13, please provide, beginning with January 1, 2003, the average total monthly cost incurred per line served in Washington State by LATA, MSA, and wire center, and specify the source of those costs by service type. These costs should include costs associated with switching; loops; collocation;

transport; hot cuts; OSS; signaling; customer acquisitions; backhauling traffic to your switches; maintenance, operations, and other administrative activities; and capital costs. Please provide any available breakdowns of each cost component that is part of the average total cost per line, identifying the type and amount of each cost. Please identify any cost differences between types of customers served.

**Response:** ICG objects to this request on the grounds that it seeks highly confidential, commercially sensitive information. ICG further objects to this request to the extent that it would require ICG to perform a special study. Subject to and without waiving that objection, ICG states that its systems are not designed to determine this information. As noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 17: (Bench Request No. 48)**

Please state whether you are providing, or have plans to provide, through a wholesale, lease, or resale arrangement, capacity on any switches you own or operate in Washington state, or that you own or operate in another state and that you use to provide a qualifying service in Washington state, to another carrier for use in providing qualifying services anywhere in Washington state. For each switch you identify in response to this bench request, please identify:

- (a) The CLLI code for the switch;
- (b) The make, model, age, and current software upgrades of the switch;
- (c) The geographic location of the switch;
- (d) The geographic area served by the switch; including a list of all exchanges served by the switch;
- (e) The features and functions (including software upgrades) available in the switch;
- (f) The capacity of the switch, including:
  - (i) Percentage of switch capacity in use;
  - (ii) Percentage of switch capacity reserved for your own use and future use; and
  - (iii) Percentage of current and future capacity of the switch that will be made available for CLEC use.
- (g) For each switch identified, please state in detail:
  - (iv) The anticipated service life of each switch;
  - (v) Whether you intend to use the switch for the full anticipated service life.
- (h) The rates, terms, and conditions under which you are making the switch capacity available;
- (i) The identity of the other carrier, whether you are affiliated with the other carrier, and if you are affiliated, the nature of the affiliation.

**Response:** ICG objects to this request on the grounds that it seeks highly confidential, commercially sensitive information. ICG further objects to this request to the extent that it would require ICG to perform a special study. Subject to and without waiving that objection, ICG states that it does not currently have plans to provide switching capacity to another carrier.

**CLEC QUESTION NO. 18: (Bench Request No. 49)**

For each month beginning with January 1, 2003, please identify the monthly churn rate you have experienced in providing qualifying services to end user customers in Washington state. In answering this bench request, you should calculate the churn rate as the number of voice grade equivalent lines lost each month divided by the average number of voice grade equivalent lines in service each month. In calculating the churn rate, do not include customers who move but remain your customer.

**Response:** ICG objects to this request on the grounds that it seeks highly confidential, commercially sensitive information. ICG further objects to this request to the extent that it would require ICG to perform a special study. Subject to and without waiving that objection, ICG states that its systems are not designed to determine this information. As noted in response to CLEC Question No. 8, ICG provides data-only services to customers in Washington, and does not utilize its switch in Washington to provide local voice telecommunications to end users or offer wholesale local circuit switching to other providers serving local voice telecommunications end users. Therefore, this request is not applicable.

**CLEC QUESTION NO. 19: (Bench Request No. 50)**

Please provide a list of all transport facilities (*i.e.*, trunks) in Washington state between any two Qwest central offices, or between a Qwest central office and non-Qwest facilities, that you own, control, or lease or have obtained use of from an entity other than Qwest. For each such facility, please identify:

- (a) The A (beginning) location, the Z (ending) location, and any other premises through which the facility is routed;
- (b) The wire center in which the facility is located, by CLLI code (if wire center data is unavailable, please report the data by city);
- (c) The type of transport facility (*i.e.*, DS0, DS1, DS3, dark fiber);
- (d) The transport technology used (*e.g.*, fiber optic (dark or lit), microwave, radio, or coaxial cable);
- (e) The level of capacity the facility is capable of supporting;
- (f) Whether you own the facility, lease or purchase transmission capacity on the facility, use the facility on an unbundled basis, or have obtained the use of the switch on some other non-ownership basis, and if you do not own the facility, please identify the nature of the arrangement and the name of the entity owning the facility; and
- (g) The number of facilities you own, control, lease, or have use of along the same A to Z route you identify in section (a) above.

**Response:** ICG does not own, control or lease transport facilities in Washington. As such, ICG does not have information relevant to the Commission's analysis in this proceeding. Therefore, CLEC Question Nos. 20 through 25 are not applicable.

**CLEC QUESTION NO. 20: (Bench Request No. 51)**

Please provide a list of all the Qwest wire centers in Washington state, identified by name, address, and CLLI code, to which you provide or offer transport facilities (*i.e.*, any facilities that,

directly or indirectly, provide connections to wire centers) to other carriers. For each such facility, please identify:

- (a) The type of transport facility (*i.e.*, DS0, DS1, DS3, dark fiber);
- (b) The transport technology used (*e.g.*, fiber optic (dark or lit), microwave, radio, or coaxial cable);
- (c) The level of capacity the facility is capable of supporting; and
- (d) The names of the other carriers.

**Response:** ICG does not provide or offer transport facilities to other carriers in Washington.

**CLEC QUESTION NO. 21: (Bench Request No. 52)**

For each transport facility identified in your response to CLEC Question No. 19 that you have deployed yourself or have obtained from a supplier other than Qwest, please identify the cost of the facility, including the installation cost for any facilities that you have deployed yourself, and the rates, terms, and conditions of any transport facilities that you obtain through a wholesale, lease, or resale arrangement from any entity other than Qwest.

**Response:** ICG objects to this request on the grounds that it seeks highly confidential, commercially sensitive information. Subject to and without waiving that objection, as noted in response to CLEC Question No. 20, ICG does not provide or offer transport facilities to other carriers in Washington. Therefore, this request is not applicable.

**CLEC QUESTION NO. 22: (Bench Request No. 53)**

Please identify the points within Washington state and the location (by street address and/or V & H coordinates) at which you connect your local network facilities to the networks of carriers other than Qwest, including interconnection with other CLECs, interexchange carriers, or internet service providers at any point of presence (POP), network access point (NAP), collocation hotel, data center, or similar facility.

**Response:** ICG does not own or control local network facilities in Washington. Therefore, this request is not applicable.

**CLEC QUESTION NO. 23: (Bench Request No. 54)**

Please provide a list of all fiber rings in Washington state that you own or control and identify the location (by street address and/or V&H coordinates) of each add-drop multiplexer or comparable facility for connecting other transport facilities (*e.g.*, wire centers, loops, other fiber rings) to the fiber ring.

**Response:** ICG does not own or control fiber rings in Washington.

**CLEC QUESTION NO. 24: (Bench Request No. 55)**

Please identify whether you are affiliated with Qwest in any way or with any other carrier (including intermodal providers) that serves the transport routes or connection points identified in response to CLEC Questions No. 19 and 22. If so, please describe the affiliation.

**Response:** ICG is not affiliated with Qwest or with any other carrier identified in response to CLEC Question Nos. 19 and 22.

**CLEC QUESTION NO. 25: (Bench Request No. 56)**

Please identify whether you have any long-term (10 or more years) dark fiber Indefeasible Rights of Use (IRUs) between any two Qwest wire centers or other facilities in the same LATA in Washington state, in which you maintain an active physical collocation arrangement.

**Response:** ICG does not have long-term dark fiber Indefeasible Rights of Use in Washington.

**CLEC QUESTION NO. 26: (Bench Request No. 57)**

If you have identified any long-term dark fiber IRUs in your answer to CLEC Question No. 25, please identify for each pair of wire centers or other locations:

- (a) The common name, address and CLLI code for each pair of wire centers or other locations;
- (b) The number of dark fiber pairs terminating at each of the physical collocation facilities;
- (c) Whether you have attached optronics to the dark fiber, and if so, the transmission level of each such lit circuit; and
- (d) The term of the IRU.

**Response:** As noted in response to CLEC Question No. 25, ICG does not have long-term dark fiber Indefeasible Rights of Use in Washington. Therefore, this request is not applicable.

**CLEC QUESTION NO. 27: (Bench Request No. 58)**

Please provide a list of all recurring and non-recurring rate elements and rates that apply when a CLEC purchases UNE-L and special access, EEL, DS1, DS3, or dark fiber transport from a Qwest rate center to a CLEC rate center.

**Response:** ICG objects to this requests on the grounds that the information requested is already available to the Commission or is part of the public record before the Commission. ICG further objects to this request on the grounds that it is vague, ambiguous and unclear and seeks information not in ICG's possession. ICG interprets this request to include only the rates that apply to ICG as ICG does not know what rates may apply to other CLECs purchasing UNE-L, special access, EEL, DS1, DS3, or dark fiber transport from a Qwest rate center to a CLEC rate center. Under that interpretation and subject to and without waiving its objections, ICG states that it does not purchase UNE-L, special access, EEL, DS1, DS3, or dark fiber transport from a Qwest rate center to an ICG rate center. Were ICG to do so, the rates in its interconnection agreement with Qwest and/or Qwest's tariffs would apply to such purchases.

**CLEC QUESTION NO. 28: (Bench Request No. 59)**

For each Qwest wire center in which you have a collocation arrangement, please identify:

- (a) The name, address, and CLLI code of the wire center;
- (b) The number of collocation arrangements for each wire center identified;
- (c) The type of collocation (*e.g.*, caged, cageless, shared or virtual);
- (d) The type of equipment and the number of equivalent DS0 channels for all services in each collocation space (*e.g.*, DLC, remote switches, multiplexers, transmission terminals, etc.);
- (e) The types of services provided using such an arrangement (*e.g.*, qualifying services, broadband, internet access);
- (f) The cost and capacity of each item of equipment identified above;
- (g) The transmission facilities and the number of equivalent DS0 channels for all services used to connect the wire center to your switch or non-Qwest switching provider;
- (h) The type of termination equipment used in the collocation arrangement;
- (i) The amount of unused or excess space in each collocation space; and
- (j) The approximate number of days between the date the collocation space was turned over to you and the date equipment in the collocation space was first used to provide local service. If the collocation space has not been used to provide local service, or was so used in the past but is not now, so state and provide the date, if any, on which you intend to use the space to provide local service.

**Response:** ICG objects to this request to the extent that it would require ICG to perform a special study and is therefore unduly burdensome. ICG's systems are not designed to determine this information. Subject to and without waiving that objection, ICG states that it does not have collocation arrangements in Qwest wire centers.

**CLEC QUESTION NO. 29: (Bench Request No. 60)**

For each shared or non-Qwest location (*e.g.*, collocation hotels) in which you are located, please state:

- (a) The name address, or CLLI code (if applicable) of the shared or non-Qwest location;
- (b) The type of collocation or sharing/leasing of space for placement of equipment (*e.g.*, caged, cageless, shared or virtual);
- (c) The type of equipment and the number of equivalent DS0 channels for all services in the collocation space (*e.g.*, DLC, remote switches, multiplexers, transmission terminals, etc.);
- (d) The types of services provided using such an arrangement (*e.g.*, qualifying services, broadband, internet access);
- (e) The cost and capacity of each item of equipment identified above; and
- (f) The transmission facilities and the number of equivalent DS0 channels for all services used to connect the office to your switch or non-Qwest switching provider.

**Response:** ICG objects to this request to the extent that it would require ICG to perform a special study and is therefore unduly burdensome. ICG's systems are not designed to determine this information. Subject to and without waiving that objection, ICG states that it does not have shared or non-Qwest collocation arrangements in Washington.

**CLEC QUESTION NO. 30: (Bench Request No. 61)**

Please provide a list of all Qwest wire centers in Washington state, identified by name, address, and CLLI code, at which you connect a collocation arrangement to a facility or collocation arrangement belonging to another carrier, and for each connection, identify the carrier and the capacity or type of connection.

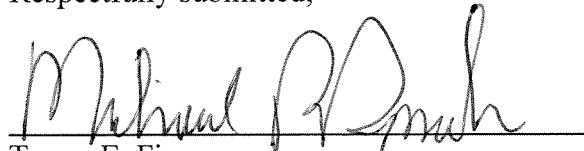
**Response:** ICG does not connect collocation arrangements to facilities or collocation arrangements belonging to other carriers.

**CLEC QUESTION NO. 31: (Bench Request No. 62)**

Please provide a list of all Qwest wire centers in Washington state, identified by name, address and CLLI code, at which you were denied the ability to connect a collocation arrangement to a collocation arrangement or facility belonging to another carrier.

**Response:** ICG is not aware of any such instances.

Respectfully submitted,



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