

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into)
 U S WEST Communications, Inc.'s) Docket No. UT-003022
 Compliance With Section 271 of the)
 Telecommunications Act of 1996)
 _____)

In the Matter of U S WEST Communications,) Docket No. UT-003040
 Inc.'s Statement of Generally Available)
 Terms Pursuant to Section 252(f) of the)
 Telecommunications Act of 1996)
 _____)

**AT&T'S RESPONSES TO APPENDIX B QUESTIONS TO CLECS
REGARDING PUBLIC INTEREST**

Public interest Pursuant to Section 271 (d)(3)©	AT&T Testimony Cite
Provide any information that your company believes will assist this Commission in establishing whether U S WEST's (Qwest's) Section 271 application for interLATA relief is in the public interest, convenience and necessity.	See affidavit of Diane F. Roth dated 7/6/01, adopting the 6/7/01 affidavit of Mary Jane Rasher
1. Any evidence your company has as to whether U S WEST's (Qwest's) entry into the interLATA long distance market is in the public interest, including but not limited to:	
i) the present state of competition in the provision of local and long distance services;	Roth, p. 27
ii) the likely development of further competition in the local and long distance markets if U S WEST (Qwest) does not enter;	
iii) the likely competitive impact in the local and long distance markets if U S WEST (Qwest) enters the long distance market;	Roth, pp. 27-29, remonopolization will occur if Qwest enters the long distance market now. Qwest must demonstrate full, irreversible, and measurable compliance with its obligations before the Commission endorses the Qwest

	<p>application.</p> <p>Roth, pp. 29-41, structural separation is key to truly opening the local market to competition. Structural separation is a pragmatic and moderate attempt to enable dominant producers or suppliers whose participation in a given market raises special problems to participate, while reducing the risks that their customers or competitors will be disadvantaged by such participation.</p>
iv) a description of the factors that should be considered in assessing whether U S WEST's (Qwest's) entry into the long distance market would be in the public interest.	Roth, pp. 2-41
2. Whether the public interest requires the presence of viable local competition in at least the major markets in Washington	<p>Roth pp. 4-5, viable local competition cannot exist unless barriers to CLEC market entry have been removed.</p> <p>Roth pp 20-23, status of competition in the local market indicates it is not open to competition.</p>
3. Whether such competition should be available to both business and residential customers. If viable competition is not required, whether, as an alternative, any other level or standard or test of competition must be met in order to establish that the application is in the public interest.	Roth, p. 5, public interest analysis must consider whether approval of a section 271 application will foster competition in all relevant telecommunications markets.
4. Whether integrative efficiencies, to producers or consumers, are likely to result from U S WEST's (Qwest's) ability to	

offer both long distance and local service.	
5. In what ways, if any, U S WEST's (Qwest's) long distance entry or absence is likely to affect the ability of other firms to achieve such efficiencies.	
6. What risk exists that U S WEST's (Qwest's) market power in local markets could be used to hamper competition in the provision of any telecommunications service, including both local and long distance services.	Roth, pp. 7-10, 27, because Qwest possesses the vast majority of local access lines, as long as access charges are priced considerably above cost, Qwest will maintain a huge anti-competitive price advantage and will soon dominate and ultimately monopolize the long distance market.
7. Whether U S WEST's ability or incentive to hamper competition will be affected by its entry into long distance.	See response to 6.
8. Whether the entry of U S WEST (Qwest) into long distance will affect the incentives of long distance companies to expand into local service.	See response to 2.
9. Whether there is a "first mover" advantage associated with the ability to offer integrated service, and if so, how significant that advantage will be.	

Dated this 11th day of July 2001.

Respectfully Submitted,

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC. AND
TCG SEATTLE**

By: _____

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