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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In Regard to the Request of ALL WEST COMMUNICATIONS, INC. for Revision to Exchange Boundaries	DOCKET NO. 02-2270-01 All West Communications, Inc.’s Responses to Qwest’s First Set of Data Requests
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All West Communications, Inc. (“All West”) hereby submits the following Responses to Qwest’s First Set of Data Requests to All West pursuant to the applicable rules and procedure.

1.1. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised is All West willing to provide nondiscriminatory access to network elements on an unbundled basis at any technically feasible point in its network to any requesting telecommunications carrier?

Response: As a rural LEC, All West is exempt from many obligations imposed upon the Bell Companies, specifically, those outlined in Section 251(c) of the 1996 Telecommunications Act. Congress correctly recognized that many of these obligations would be uneconomically burdensome and/or not technically feasible, which could jeopardize the rural LECs’ ability to provide universal service. The stated purpose of this proceeding is to revise an exchange boundary between All West and Qwest, not terminating All West’s exemption. The exemption from the obligations of Section 251(c) – which generally address allowing competitors to use the incumbent’s network -- are just as valid today as when the 1996 Telecommunications Act was passed. All West is not requesting access to Qwest’s network elements in this proceeding, nor has it requested access to Qwest’s network elements on any prior occasion.

1.2. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised is All West willing to provide unbundled access to network elements to any requesting carrier at TELRIC pricing?

Response: Please see response to Data Request 1.1.

1.3. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised is All West willing to establish a Statement of Generally Available Terms and Conditions (“SGAT”) that any requesting carrier can opt in to?

Response: Please see response to Data Request 1.1.

1.4. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised, is All West willing to negotiate the terms and conditions of agreements with any requesting carrier with respect to Resale, Number Portability, Dialing Parity, Access to Rights of Way, and Reciprocal Compensation?

Response: Yes, pursuant to (251(b) of the federal act.

1.5. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised, is All West willing to offer for resale at wholesale rates any telecommunications service that it provides at retail to subscribers who are not telecommunications carriers?

Response: Please see response to Data Request 1.1.

1.6. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised, is All West willing to establish and/or provision Operational Support Systems designed to allow competitors access to pre-ordering, ordering, provisioning, maintenance and repair, and billing functions in substantially the same time and manner as those functions are provided to itself.

Response: Please see response to Data Request 1.1.

1.7. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised, is All West willing to provide physical and/or virtual collocation to requesting carriers in its Central Offices at TELRIC rates.

Response: Please see response to Data Request 1.1.

1.8. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised, is All West willing to waive any exemptions it may otherwise have under 47 U.S.C. § 251(f)?

Response: Please see response to Data Request 1.1.

1.9. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised, is All West willing to accept, without exception, all of the obligations currently imposed upon Qwest under 47 U.S.C. §§ 251 and 252?

Response: Please see response to Data Request 1.1.

1.10. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised, is All West willing to serve this territory as an ILEC without the benefit of federal and state universal service support?

Response: Yes, if it is deemed imperative by the PSC. However, All West contends that arbitrarily denying it access to federal support mechanisms would unnecessarily harm the customers residing in Promontory.

1.11. With respect to any facilities that have already been placed in the Promontory development by All West, has All West received any federal or state universal service support with respect to those facilities? If so, identify whether the support is federal or state and the amount or approximate amount of support received.

Response: All West receives \$xx per month in federal support for Promontory customers residing in its service territory. All West's state high cost fund draw was determined prior to the development of Promontory, accordingly it receives no support from the state high cost fund for serving these customers

1.12. Please describe all facilities placed by All West, or any of its affiliates, in East Promontory, including each type of facility, when they were placed, where they are located, including whether the facilities are located within a public utility easement, and the name of the entity that owns each of the facilities.

Response: All West Communications has placed duct in trenches opened by the developer or its agents along all major roads within the Promontory development. These trenches are in a public right-of way and were placed as the trenches were opened beginning in 2002 and continuing to the present. Fiber optic cable is placed in these ducts as required when services are needed. Also in 2002 an equipment building was placed on property owned by the developer within an exclusive easement. Fiber transport and termination equipment has been placed in the building as needed.

1.13. Please describe all facilities placed by All West, or any of its affiliates, in West Promontory, including each type of facility, when they were placed, where they are located, including whether the facilities are located within a public utility easement, and the name of the entity that owns each of the facilities.

Response: All West objects to this Data Request on grounds that this information is highly confidential and could negatively impact All West's competitive efforts versus Qwest, the Request is overly broad, unduly burdensome, and it is not calculated to lead to the discovery of admissible evidence.

1.14. Please provide a copy of any written agreement between All West, or any of its affiliates, and the developer of the Promontory development.

Response: The agreement is on file at the PSC.

1.15. Please describe all representations or promises made by All West, or any of its affiliates, to the developer of the Promontory development not reflected in any written agreement.

Response: None.

1.16. Please describe the terms and conditions on which All West, or any of its affiliates, provides telecommunications, internet access and video services to customers in East Promontory.

Response: Telecommunications services are provided via filed tariffs; Internet access and video services are provided via current price lists.

1.17. Please describe the terms and conditions on which All West, or any of its affiliates, provides telecommunications, internet access and video services to customers in West Promontory.

Response: Telecommunications services are provided via currently filed CLEC price lists; Internet access and video services are provided via current price lists.

1.18. Please state the number of customers to whom telecommunications service is provided by All West, or any of its affiliates, in East Promontory. Please state the number of such customers who receive internet access in addition to telecommunications services. Please state the number of such customers who receive video services in addition to telecommunications services.

Response: Today there are 49 telecommunications subscribers in East Promontory. All West objects to the remainder of this Data Request on grounds that it is irrelevant to this proceeding and that service penetration rates are highly confidential.

1.19. Please state the number of customers to whom telecommunications service is provided by All West, or any of its affiliates, in West Promontory. Please state the number of such customers who receive internet access in addition to telecommunications services. Please state the number of such customers who receive video services in addition to telecommunications services.

Response: Today there are 35 telecommunications subscribers in West Promontory. For the remainder of the question, see the response to Data Request 1.18.

1.20. Please describe any conduit that has been placed and that would be available to Qwest or to any other telecommunications provider to provide telecommunications services to customers in the Promontory development, including, the size, location, owner and terms and conditions for use of the conduit.

Response: See response to Data Request 1.1.

1.21. Please state the number of customers to whom telecommunications service is currently provided by All West, or any of its affiliates, in Qwest's Park City Exchange other than customers in West Promontory. Please state the number of such customers who receive internet access in addition to telecommunications services. Please state the number of such customers who receive video services in addition to telecommunications services.

Response: See response to Data Request 1.18.

1.22. If the answer to any part of the foregoing data request is other than zero, please provide responses to the following:

- a. State whether the telecommunications services are provided by All West / Utah?
- b. State whether All West accounts for the assets, revenues and expenses associated with service to such customers separately from the assets, revenues and expenses associated with service to All West's customers in its Jordanelle Exchange and, if so, how.
- c. State whether All West receives any federal or state universal service support for the facilities used to serve these customers. If so, identify whether the support is federal or state and the amount or approximate amount of support received from each source.
- d. Describe how the service is provided (e.g., the switch used to provide services, the facilities over which traffic is routed between the originating customer and the switch and from the switch to any terminating customer in the Park City Exchange, etc.)

Response: All services provided outside of the incumbent exchange boundaries are provided by All West/Utah, an affiliated competitive LEC. All West /Utah maintains its own accounting books and records. All West objects to the remainder of the questions on grounds that they are irrelevant to this proceeding and All West/Utah is not a party to this proceeding.

1.23. For East Promontory please describe the methods All West uses to record its broadband investment and expenses into regulated accounts in accordance with FCC rules.

Response: All West records all its investment and expenses, including broadband, in accordance with FCC Part 32 rules.

1.24. For investment and expenses in East Promontory, please describe the equipment and plant types (e.g. DSLAMs, combo cards, shelves, feeder systems, etc.) that are allocated to the regulated accounts to contribute to the NECA tariff charge for DSL or internet access services.

Response: All West objects to this Data Request on grounds that it calls for the disclosure of information that is highly confidential and the information is irrelevant to this proceeding.

1.25. For investment and expenses in East Promontory, please describe the equipment and plant types (e.g. cable and wire, circuit equipment, digital loop carrier, etc.) that are allocated to the regulated accounts to contribute to the NECA tariff charge for common line services.

Response: All West objects to this Data Request on grounds that it calls for the disclosure of information that is highly confidential and the information is irrelevant to this proceeding.

1.26. Is the video offering mentioned on page 3 line 47 of D. Vernile Prince's Direct Testimony a non-regulated service?

a. If not (if it is a regulated service), please provide the name of the regulatory agency, provide the tariff or price lists, and provide any price or cost regulatory rules governing the provision of the video service.

b. If it is a non-regulated service, please provide in detail the cost allocation methods used to allocate account or sub-account investment and expenses associated with the provision of the video service to a non-regulated affiliate of All West.

Response: The retail provision of video services is not regulated in Utah. All West complies with the FCC's Part 64 in the allocation of non-regulated services.

1.27. Please provide any NECA advice letters or methodologies (e.g. NECA “nonreg paper 032103.doc”, NECA “NonRegServLtr.doc”) followed by All West in accounting for non-regulated investment and expenses.

Response: See response to Data Request 1.26.

1.28. Provide the account by account methodology used to allocate investments and expenses between All West Communications and All West / Utah with respect to service to customers in West Promontory.

Response: The methodology is simple in that All West employees record their time to the company (ILEC or CLEC) that they are working for. All associated expenses (taxes, benefits, tools, vehicles and work equipment) are then allocated based on that time record.

1.29. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised, does All West intend to seek a modification of its federal study area to include West Promontory within its study area? If so, please provide the amount or All West’s best estimate of the amount of federal universal support that will be provided for facilities used to serve customers in West Promontory.

Response: Yes. Federal support mechanisms for rural LECs are currently based upon embedded costs of serving the entirety of the study area, as compared to the costs of providing service for over 1100 other rural LECs throughout the nation. Accordingly, there are simply too many variables for All West to reasonably estimate future support amounts.

1.30. Please describe in detail how All West currently provides local calling for customers in East Promontory into Qwest’s Park City Exchange. In your description, please identify the All West entity offering any service involved, the All West entity owning each facility used to provide the service and, if more than one All West entity is involved in provisioning the service, how the investment and expenses associated with the service are accounted for between the entities, how the traffic is routed to Qwest and the provisions of any agreement between All West and Qwest pursuant to which the traffic is exchanged.

Response: All West presently offers a switched FX service to customers in East Promontory to allow them non-toll calling into Qwest’s Park City Exchange. This service is provided between All West Communications and All West / Utah and offered by All West Communications via the approved tariff. Traffic is routed from the All West switch to the CLEC, which has inter-company trunks to Qwest’s Park City exchange. All West / Utah has an interconnection agreement with Qwest which facilitates the passing of traffic between the two entities.

1.31. Please describe in detail how All West currently provides local calling for customers in its Jordanelle Exchange other than those in East Promontory into Qwest's Park City Exchange. In your description, please identify the All West entity offering any service involved, the All West entity owning each facility used to provide the service and, if more than one All West entity is involved in provisioning the service, how the investment and expenses associated with the service are accounted for between the entities, how the traffic is routed to Qwest and the provisions of any agreement between All West and Qwest pursuant to which the traffic is exchanged.

Response: The tariff offering described in the response to Data Request 1.30 above is not limited to the Promontory exchange. The switched FX described above is available from other areas in All West's service territory and is provisioned in the same manner.

1.32. Please describe in detail how All West currently provides local calling for customers in its exchanges other than Jordanelle into Qwest's Park City Exchange. In your description, please identify the All West entity offering any service involved, the All West entity owning each facility used to provide the service and, if more than one All West entity is involved in provisioning the service, how the investment and expenses associated with the service are accounted for between the entities, how the traffic is routed to Qwest and the provisions of any agreement between All West and Qwest pursuant to which the traffic is exchanged.

Response: The primary method for calling between All West's service territory is via the toll network. Some customers that perceive it to be a good value have purchased the switched FX described in the response to Data Request 1.30 above.

1.33. Please state whether All West would be willing to have the exchange boundaries of its Jordanelle Exchange modified to include East Promontory within Qwest's Park City Exchange. If not, please state the reasons All West is not willing to agree to such modification.

Response: All West is not willing to adjust its exchange boundary to make East Promontory part of the Qwest Park City exchange because it makes no sense to do so. East Promontory is currently being served by an ILEC which is regulated by the state PSC. If the exchange boundary were to be changed as suggested, there would be no ILEC serving any of the Promontory development which is not in the public interest. If All West became a CLEC for the entire development, it could pick and choose to serve the easy customers and refuse to serve the hard ones. The customers would then be left virtually without a provider as Qwest could not serve them economically.

1.34. On page 5, lines 93-96, of the Direct Testimony of D. Vernile Prince, Mr. Prince states that “in reality it is impossible for our CLEC to charge the same rates as our ILEC. We do try to make sure that all customers get the same treatment when it comes to installation, repairs and general quality of service, but there is very little we can do on price and still recover our costs.” Please explain in detail why it is impossible for All West / Utah to charge the same rates as All West Communications and why All West / Utah would not recover its costs if it did so.

Response: All West / Utah purchases dial tone line from All West Communications at virtually retail, therefore it would be impossible to turn around and sell them at the same price and make a profit.

1.35. With respect to customers served by All West in East Promontory, describe how the service is provided (e.g., the switch used to provide services, the facilities over which traffic is routed between the originating customer and the switch and from the switch to any terminating customer, etc.).

Response: Service to customers in East Promontory is provided via the host switch in Kamas, then transported via fiber transport facility to a fiber drive located in a building located within the development. From there, services are extended to individual locations via local fiber facilities. At the customer premise the broadband is separated into its individual components via a fiber point network interface device and passed to the customer’s network. Calls originating at the customer’s premise follow the reverse route to the local switch.

1.36. With respect to customers served by All West in West Promontory, describe how the service is provided (e.g., the switch used to provide services, the facilities over which traffic is routed between the originating customer and the switch and from the switch to any terminating customer, etc.).

Response: Services to customers in West Promontory are provided exactly the same way as described in the response to Data Request 1.35. The only difference is that the CLEC owns the final transport and termination facility.

1.37. On page 5, line 100, of the Direct Testimony of D. Vernile Prince, Mr. Prince states that “not a single customer has requested seasonal service.” Please provide any evidence in All West’s possession that the homes in the Promontory development are not second homes used primarily for recreation.

Response: All West is aware that most of the homes in the Promontory development are not primary residences. When Summit County approved the development it was on the basis that it would be a second home community. The fact that these customers are only there part time, yet are subscribing to full time service, is evidence of their willingness to contribute to the cost of the network and associated NECA, federal and state fees on a full time basis.

1.38. On page 6 and 7, lines 135-143, of the Direct Testimony of D. Vernile Prince, Mr. Prince discusses prior service territory boundary changes involving Qwest. At the time of the development of Jordanelle Reservoir, did Qwest's predecessor relinquish territory to All West? If so, please provide a description of the territory relinquished.

Response: Yes, Qwest begged All West to take the Rockport area of the Coalville exchange. That transfer took place in 1999, several years after the Jordanelle Reservoir was completed.

1.39. With respect to the Promontory development, if the existing service territory between All West and Qwest is revised is All West willing to waive the size requirements for CLEC entry into East Promontory? If not, why not?

Response: Yes.

1.40. How much support does All West receive in its service territory in Utah from the federal universal service fund? If available, provide this information on a per line per month basis. If the foregoing is not available, provide the number of lines served by All West in Utah.

Response: All West objects to this Data Request on grounds that this information is publicly available on the USAC website.

1.41. How much support does All West receive in its service territory in Utah from the Utah Universal Public Telecommunications Service Support Fund. If available, provide this information on a per line per month basis. If the foregoing is not available, provide the number of lines served by All West in Utah.

Response: All West objects to this Data Request on grounds that this information is publicly available from the PSC.

1.42. Can a customer of All West in the Promontory development subscribe only to broadband service without subscribing to voice and video service?

Response: Customers currently purchasing broadband services from All West must also subscribe to voice services in accordance with the NECA tariff, or pay an additional fee for the cable pair transporting the broadband.

Certificate of Service

I certify that I caused a true and correct copy of the foregoing responses of All West Communications, Inc. to Qwest's First Set of Data Requests to be emailed on September 1, 2006 to the following:

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In Regard to the Request of ALL WEST COMMUNICATIONS, INC. for Revision to Exchange Boundaries	DOCKET NO. 02-2270-01 All West Communications, Inc.’s Responses to Qwest’s Second Set of Data Requests
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All West Communications, Inc. (“All West”) hereby submits the following Responses to Qwest’s Second Set of Data Requests to All West pursuant to the applicable rules and procedure.

2.1. Has All West received any customer complaint, including a formal or informal complaint to the Public Service Commission (“Commission”) or Division of Public Utilities (“Division”), from customers in West Promontory regarding the rates charged by All West / Utah for telecommunications services to them versus the rates charged by All West Communications for telecommunications services to its customers in East Promontory? If yes, for each complaint, please provide the date or approximate date of the complaint and state the basis for the complaint. If the complaint was formal, please provide a copy of the complaint.

Response: All West objects to this Data Request on grounds that it is burdensome and the information is otherwise readily available publicly at the Public Service Commission or the Division of Public Utilities. Without waiving these objections, All West responds as follows: No. As stated in pre-filed testimony, due to All West providing an acceptable alternative, All West is not aware of any such customer complaint.

2.2. Has All West received any complaint, including a formal or informal complaint to the Commission or Division, from a customer of All West Communications located in East Promontory regarding the inability of the customer to place non-toll calls to Park City or having to pay for foreign exchange (“FX”) service to make such calls without toll charges? If so, for each complaint identify the date or approximate date the complaint was received and state the basis for the complaint. If the complaint was formal, please provide a copy of the complaint.

Response: All West objects to this Data Request on grounds that it is burdensome and the information is otherwise readily available publicly at the Public Service Commission or the Division of Public Utilities. Without waiving these objections, All West responds as follows: No. As stated in pre-filed testimony, due to All West providing an acceptable alternative, All West is not aware of any such customer complaint.

2.3. Has All West received any complaint, including a formal or informal complaint to the Commission or Division, from a customer of All West Communications located in East Promontory or a customer of All West / Utah located in West Promontory regarding the fact that customers in East Promontory have different NXXs than customers in West Promontory or that customers in one side of the Promontory development are required to pay toll charges or pay for FX service to place non-toll calls to customers on the other side of the Promontory development? If so, for each complaint identify the date or approximate date the complaint was received and state the basis for the complaint. If the complaint was formal, please provide a copy of the complaint.

Response: All West objects to this Data Request on grounds that it is burdensome and the information is otherwise readily available publicly at the Public Service Commission or the Division of Public Utilities. Without waiving these objections, All West responds as follows: No. As stated in pre-filed testimony, due to All West providing an acceptable alternative, All West is not aware of any such customer complaint.

2.4. Has All West received any complaint, including a formal or informal complaint to the Commission or Division, from a customer of All West Communications located in East Promontory or a customer of All West / Utah located in West Promontory regarding any aspect of the telecommunications service provided to them other than those identified in response to the foregoing data requests? If so, for each complaint identify the date or approximate date the complaint was received and state the basis for the complaint. If the complaint was formal, please provide a copy of the complaint.

Response: All West objects to this Data Request on grounds that it is burdensome and the information is otherwise readily available publicly at the Public Service Commission or the Division of Public Utilities. Without waiving these objections, All West responds as follows: No. As stated in pre-filed testimony, All West is not aware of any such customer complaint.

2.5. On page 3, lines 62-63 of his testimony, D. Vernile Prince stated that “All West made a presentation of its qualifications and ability to serve, along with suggested solutions to the various problems.” Did All West provide suggestions regarding solutions for local calling within the Promontory development and between Promontory and Park City or any other exchange area? If yes, please describe in detail the various “solutions” discussed.

Response: To the best of Mr. Prince’s recollection, the only solution discussed regarding local calling was to try to provide EAS.

2.6. Are the rates for telecommunications service charged by All West / Utah to customers in West Promontory the same rates that it charges to other customers of All West / Utah in other portions of Qwest's Park City Exchange? If not, please identify each different rate charged and the basis for the difference.

Response: Yes

2.7. In its response to Qwest Data Request 1.34, All West stated that "All West / Utah purchases dial tone line from All West Communications at virtually retail." In its response to Qwest Data Request 1.35, All West stated that "[s]ervice to customers in East Promontory is provided via the host switch in Kamas, then transported via fiber transport facility to a fiber drive located in a building located within the development. From there, services are extended to individual locations via local fiber facilities. At the customer premise the broadband is separated into it individual components via a fiber point network interface device and passed to the customer's network." In its response to Qwest data request 1.36, All West stated that "[s]ervices to customers in West Promontory are provided exactly the same way as described in the response to Data Request 1.35. The only difference is that the CLEC owns the final transport and termination facility." Given these responses, please respond to the following questions:

a. Does All West / Utah resell dial tone line service provided by All West Communications to All West / Utah's customers in West Promontory?

Response: Yes

b. If the answer to the foregoing is no, does All West / Utah interconnect with All West Communications with All West / Utah providing only the local fiber facilities and fiber point network interface device between the point of interconnection and the customer's network?

Response: N/A.

c. If the answer to the foregoing is yes, is the point of interconnection between All West Communications and All West / Utah located in the fiber drive located in a building located within the development referenced in All West's response to Qwest Data Request 1.35?

Response: All West objects to this Data Request on grounds that it is unclear and is irrelevant. Without waiving these objections, All West answers as follows: If the word foregoing refers to Data Request 2.7 a..., based on All West's understanding of the question, the answer is yes.

d. Where is the building referenced in All West's response to Qwest Data Request 1.35 located? Please provide the street address or approximate street address of the building and state whether it is located in East Promontory or West Promontory.

Response: The building is located on Promontory Ranch Road in West Promontory.

e. If the response to either subpart a or b of this data request is yes, please provide a copy of the interconnection and resale agreement between All West Communications and All West / Utah.

Response: Please see the attachment.

f. If the responses to subparts a and b of this data request are both no, please describe in detail how service is provided by All West / Utah to customers in West Promontory, identifying the facilities and services used, the owner of the facilities and the provider of the services.

Response: N/A.

2.8. Please describe in detail how All West / Utah provides telecommunications services to its customers in Qwest's Park City Exchange other than in West Promontory, including without limitation answers to the following questions:

a. Does All West / Utah resell dial tone line service provided by All West Communications to All West / Utah's customers in Qwest's Park City Exchange?

Response: Yes.

b. If the answer to the foregoing is no, does All West / Utah interconnect with All West Communications with All West / Utah providing only the local fiber or copper facilities and the network interface device between the point of interconnection and the customer's network?

Response: N/A.

c. If the answer to the foregoing is yes, are the facilities fiber or copper?

Response: All West objects to this Data Request on grounds that it is unclear if the word foregoing refers to subpart a. or b. Without waiving this objection, based on All West's understanding of the question, All West answers as follows: fiber.

d. If the answer to subpart b is yes, please provide the location of the point of interconnection between All West Communications and All West / Utah. Please provide the street address or approximate street address of the building and state whether it is located in the Jordanelle or Park City Exchange.

Response: Since the answer to subpart a. is Yes, All West did not answer subpart b. All West objects to this Data Request on grounds that it is unclear and irrelevant. Without waiving these objections All West responds as follows: The facilities of All West Communications and All West/Utah meet in the Kamas central office located at 50 W. 100 North, Kamas, Utah.

e. If the responses to subparts a and b of this data request are both no, please describe in detail how service is provided by All West / Utah to customers in Qwest's Park City Exchange, identifying the facilities and services used, the owner of the facilities and the provider of the services.

Response: N/A.

2.9. If your responses to Data Requests 2.7 or 2.8 indicate that All West / Utah purchases dial tone line from All West Communications, please state whether All West Communications' investment in switching, fiber and transport, termination equipment, etc. for the dial tone line is included in the investment base upon which All West Communications receives federal high cost support? If not, please explain in detail how it is excluded.

Response: To the extent All West Communications' facilities are used to provide services to West Promontory, these costs are allocated accordingly and are not included in the determination of federal high-cost support mechanisms for All West Communications.

2.10. Please identify by name and location all developments in Qwest's Park City Exchange other than West Promontory in which All West provides telecommunications services.

Response: All West objects to this Data Request on grounds that the information it seeks is irrelevant, confidential, and competitively sensitive.

2.11. In its response to Qwest Data Request 1.11, All West stated that it receives \$33 per month in federal high cost support for Promontory customers residing in its service territory. In Qwest Data Request 1.40, Qwest asked how much support All West receives in its service territory in Utah from the federal universal service fund. All West objected to providing a response "on grounds that this information is publicly available on the USAC website." Attached is a spreadsheet containing data that Qwest has taken from this website and which calculates a per line per month amount of high cost support. Qwest's calculation shows that the per line per month federal high cost support for All West is \$47.69.

a. Does All West agree that the data contained in the spreadsheet is the correct data from the website necessary to determine the per line per month high cost support?

Response: No. The information provided is the projected revenue for fourth quarter 2006.

b. If the answer to subpart a is no, please provide the correct data for the entries in the spreadsheet from the USAC website and identify where the data is located on the website.

Response: In the process of responding to these data requests, All West learned that USAC only provides projected figures and does not true up the projections.

c. Does All West agree that based on the data on the website it receives \$47.69 a month per line per month in federal high cost support?

Response: No.

d. If the answer to subpart c is no, please provide what All West believes to be the correct calculation and the resulting amount of federal high costs support per line per month based on the data on the USAC website.

Response: As stated in the Response to Data Request 2.11 b., the USAC site only provides projected data. The actual amount for first quarter 2006 was \$44.00.

e. Please explain in detail the difference between the \$33 per month in high cost support per customer provided in response to Data Request 1.11 and the amount calculated from the publicly available information on the USAC Website.

Response: In calculating the \$33.00, Mr. Prince used numbers from a management report provided by TCA, All West's consultant, because All West's cost study consultant at TCA was not available. The cost study consultant informed Mr. Prince that \$33.00 was incorrect and provided the correct number of \$44.00.

2.12. Is Qwest's understanding that All West has now provided updated information to NECA for 2005 that is not yet available on the USAC website correct? If so, please provide updated data for each entry on the spreadsheet attached.

Response: Information on the USAC website is provided on a quarterly basis. Many of the changes in high-cost support amounts are not the result of information filed by All West, but by data filed by other carriers, which is then reflected in the actual amount of the federal distribution made. To the extent that this Data Request asks for all information All West provides to NECA, All West objects on grounds that the request is unduly burdensome and repetitive. The response to Data Request 2.11(e) describes All West's Federal USF distribution.

2.13. In his Direct Testimony, on page 5, line 95, D. Vernile Prince stated that "there is very little we can do on price and still recover our costs." In its response to Qwest Data Request 1.34, All West stated that "All West / Utah purchases dial tone line from All West Communications at virtually retail, therefore it would be impossible to turn around and sell them at the same price and make a profit." Has All West / Utah explored any other options for providing service to its customers in West Promontory? If no, please explain why not. If yes, please provide a description of each option explored and the reasons and documentation supporting why it would not be a better option than purchasing "at virtually retail" a dial tone line from All West Communications.

Response: The only other option considered was purchasing unbundled network elements, but since All West does not offer that service it was rejected.

2.14. In connection with your response to the foregoing data request, has All West / Utah considered the option of purchasing switching from another provider or serving using a VOIP technology? If no, please explain why not. If yes, please provide all reasons and documentation supporting why it would not be a better option than purchasing "at virtually retail" a dial tone line from All West Communications.

Response: No, All West considers VOIP a technology still in development. When VOIP technology proves to be reliable, All West / Utah will consider purchasing that service.

2.15. Does All West face the same problem with regard to profitability discussed in the Direct Testimony of D. Vernile Prince, on page 5, line 95, with respect to West Promontory in providing service to its other customers in Qwest's Park City Exchange? If not, please explain why not?

Response: Yes.

2.16. In West Promontory, does All West / Utah offer voice, data and video service for a single, bundled price. If yes, is All West / Utah able to make a profit on the bundled price? If no, please explain why not and provide all documentation supporting why sale of voice, data and video service for a single, bundled price is not profitable?

Response: All West objects to this Data Request on grounds that it seeks information that is irrelevant, confidential, and competitively sensitive.

2.17. In areas of Qwest's Park City Exchange other than West Promontory, does All West / Utah offer voice, data and video service for a single, bundled price. If yes, is All West / Utah able to make a profit on the bundled price? If no, please explain why not and provide all documentation supporting why sale of voice, data and video service for a single, bundled price is not profitable?

Response: All West objects to this Data Request on grounds that it seeks information that is irrelevant, confidential, and competitively sensitive.

2.18. In his Direct Testimony, pages 13-14, lines 293-296 and page 16, lines 342-344, D. Vernile Prince refers to difficulties in accounting separately for ILEC and CLEC investments and costs if the boundary change requested in this docket is not approved. Does All West account differently for CLEC investment, revenues and expenses for customers served in West Promontory than it does for customers in other parts of Qwest's Park City Exchange? If so, please describe all differences. If not, please explain in detail why it is more difficult to account for CLEC functions in West Promontory than it is in for CLEC functions in the balance of the Park City Exchange.

Response: All West service in West Promontory is relatively new and separating investment between East and West Promontory is arduous and has inherent problems. All West is awaiting the outcome of this proceeding to determine if separation will be required. All other areas served by All West / Utah are fully separated from regulated accounts.

2.19. In response to Qwest Data Requests 1.12 and 1.13, All West failed to state whether All West Communications owned facilities in West Promontory and whether All West / Utah owned facilities in East Promontory. Please identify the facilities owned by All West Communications in West Promontory and the facilities owned by All West / Utah in East Promontory.

Response: Please see response to Data Request 2.18.

2.20. Can All West's customers in the Promontory development subscribe to only telephone service on a stand alone basis? If so, do any of All West's customers in Promontory subscribe solely to telephone service? If the answer is different for East Promontory versus West Promontory, please provide separate answers for each portion of the Promontory development.

Response: Customers in East Promontory and West Promontory can subscribe only to telephone service, and there are some who do.

2.21. In response to Qwest Data Requests 1.16 and 1.17, All West stated that its services to customers in East and West Promontory were provided pursuant to tariffs and price lists. Qwest has reviewed the tariffs and price lists and based thereon understands that (i) All West's price for telephone service to customers in East Promontory is \$22.95 with local calling to Kamas and \$30.95 with local calling to Kamas and Park City and (ii) All West's price for telephone service to customers in West Promontory is \$29.45 with local calling to Kamas and Park City.

a. Please confirm that Qwest's understanding is correct or, if it is not correct, please state the correct prices charged and provide a citation to the tariff or price list page on which each of those prices may be found.

Response: That is correct.

b. Please identify each element and its price of the correct rate charged as confirmed or corrected.

Response: All West Communications residential charges

Dial Tone	\$ 13.50
Federal CALC charge	\$ 6.50
State E-911 surcharge	\$.78
Deaf Relay surcharge	\$.10
Poison Control Tax	\$.07
Total	\$ 20.95
FX charge (optional)	\$ 10.00
Total with FX	\$ 30.95

All West / Utah residential charges

Dial Tone	\$ 28.00
State E-911 surcharge	\$.78
Deaf Relay surcharge	\$.10
Poison control tax	\$.07
Total	\$ 28.95

2.22. In response to DPU Data Request 2.20, All West stated that “For basic local residential telephone service, CLEC customers in West Promontory pay \$29.95. ILEC customers in East Promontory pay \$20.95.” Please explain in detail why the amounts in All West’s response to DPU Data Request 2.20 do not correspond to the amounts set forth in Qwest Data Request 2.21 or the amounts as corrected by All West in response to Qwest Data Request 2.21.

Response: The rates previously quoted do not include taxes, fees or FX charges. The rates quoted in 2.21(b) above are the current correct rates.

2.23. In response to DPU Data Request 2.21, All West stated that “[t]here are certain fees that the ILEC must charge, such as the federal SLC, which the CLEC doesn’t have to charge and this helps keep the actual pricing of service relatively close.” Please identify and provide the amount of each fee referenced in this response on a per customer or per line basis, as applicable.

Response: See response to 2.21(b) above

2.24. Has All West requested and obtained approval for Extended Area Service from East Promontory to Kamas? If so, please identify the docket and order in which approval was obtained.

Response: No, EAS is not necessary because East Promontory is in the Jordanelle exchange which is local to Kamas, as was defined when the exchange was created.

2.25. Has All West requested and obtained approval for Extended Area Service from West Promontory to Kamas? If so, please identify the docket and order in which approval was obtained.

Response: All West / Utah has local calling from West Promontory to Kamas because it is a CLEC and CLECs are not governed by same calling area boundaries that ILECs are.

Certificate of Service

I certify that I caused a true and correct copy of the foregoing responses of All West Communications, Inc. to Qwest's Second Set of Data Requests to be emailed on September 27, 2006 to the following:

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