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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In The Matter of a Proceeding to Address)
Actions Necessary to Respond to the) DOCKET NO. 03-999-04
Federal Communications Commission)
Triennial Review Order Released August 21, 2003)
)

AT&T Communications of the Mountain States, Inc. and TCG Utah (collectively
“AT&T”) hereby submit this First Set of Discovery Requests to Qwest Corporation
 (“Qwest”).

INSTRUCTIONS

1. These data requests shall be deemed to be continuing. You are obliged to
change, supplement, and correct all answers to interrogatories and responses to the
production request to conform to available information, including such information as

first becomes available to you after the answers and production of documents hereto are filed and made, should additional information become known or should information supplied in the answers or documents prove to be incorrect or incomplete.

2. The Response to each data request provided should first restate the question asked and also identify the person(s) supplying the information.

3. In answering these data requests, furnish all information that is available to Qwest or may be reasonably ascertained by Qwest, or otherwise subject to Qwest's knowledge, possession, custody or control.

4. If Qwest objects to any part of a request, answer all parts of such requests to which Qwest does not object, and as to each part to which Qwest does object, separately set forth the specific basis for the objection.

5. If Qwest claims any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, contained in a document, set forth with respect to the document:

- (i) the date and number of pages of the document;
- (ii) the identity of the author(s) and/or preparer(s);
- (iii) the identity of the addressee, if any;
- (iv) the title;
- (v) the type of tangible thing (*e.g.*, letter, memorandum, telegram, chart, report, recording disc);
- (vi) the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);

(vii) the identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;

(viii) the identity of the present custodian(s);

(ix) the nature of your claim of non-discoverability (*e.g.*, attorney-client privilege); and

(x) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit AT&T to make a full determination as to whether the claim is valid.

6. Please provide your responses in written form no later than December 26, 2003, to:

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DEFINITIONS

1. As used herein, the term or terms “document, documentation, data, material and information” shall include, but are not limited to, the following—regardless of format (*e.g.*, electronic, paper copy or other form of audio, electronic or visual recording)—items: correspondence, memoranda, financial data, reports, investigations, studies, plans, communications, notes, notebooks, marginalia, telephone logs, recordings, opinions, decisions, photographs, drawings, sketches, graphic renderings, bulletins, pamphlets, circulars, articles, press releases, video tapes, data compilations, drafts, brochures, and other documents or tangible things of whatever description that may

constitute or contain information within the scope of the data requests, which are in the possession, custody and control of the respondent—including without limitation, any officers, directors, employees, agents, attorneys or other representatives.

2. The term or terms “Company, you, your, Qwest or Qwest Corporation” refer to the above captioned entity, Qwest Corporation and its affiliates.

3. “Identify, identity or identification” when used in herein shall mean provide the full name, title, business address and telephone number of any relevant individuals or, when used in reference to documentation, shall mean to state the type of document (*e.g.*, letter, memorandum, policy, circular, book, etc.) and the location of such documentation by business address.

4. “Describe” when used with respect to an occurrence, event, activity, or any transaction, means to provide a complete and detailed list of its nature, its time and place and to identify the persons present and involved. The term “describe” when used with respect to a document, means to provide a complete and detailed description of its nature and content. The term “describe,” when used with respect to a communication other than a document, means to provide a complete and detailed description of its nature and content.

AT&T 001 Re: Switch Triggers – Competitive Wholesale Facilities

Please identify any telecommunications carriers (including Independent Local Exchange Companies (“ILECs”) or Competitive Local Exchange Companies (“CLECs”)) that you have identified as being willing to provide, intending to provide, or currently making available, wholesale unbundled local switching used in combination with unbundled analog loops obtained from the ILEC to CLECs. Additionally, please:

- a. Produce any documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a wholesale provider and identifying the product, customer and geographic market served by such wholesale provider.
- b. Identify by wire center each wholesale alternative to ILEC circuit switching and provide the basis upon which you believe such entity qualifies as a wholesale provider.
- c. Produce any documents substantiating any assertion that a non-ILEC wholesale circuit switching provider is operationally ready to provide wholesale switching and that such provider and the ILEC have procedures

- in place to enable a carrier purchasing an ILEC analog loop to provide service of equivalent quality using another non-ILEC carrier's switch.
- d. Produce any documents, information, notes, work papers, or communications from the identified company in your possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.
 - e. Identify any other companies, other than telecommunications carriers, that are willing to offer wholesale unbundled switching to CLECs. Please provide the name, address, and telephone number of each identified companies.

AT&T 002 Re: Switch Triggers – Competitive Wholesale Facilities

For each carrier listed in AT&T 001, please provide for each switch you claim provides a wholesale alternative:

- a. The 11-digit CLLI code of the switch as it appears in the LERG, the V&H coordinates of the switch from the LERG, and claimed function of the switch (*e.g.*, stand-alone, host, or remote);
- b. For each applicable CLLI code: the associated LATA number; MSA number (if applicable); the V&H coordinates; the latitude and longitude (L&L) coordinates; the UNE loop rate zone; the special access density zone and whether interstate special access pricing flexibility is applicable for that end office;
- c. The location of each collocation arrangement that you claim is interconnected to the switch;
- d. The number of loops, by type (*i.e.*, analog UNE, DS-1 UNE, analog special access, DS-1 Special Access, etc.) provisioned to each collocation:
 - (i) Within the last 3 months;
 - (ii) Within the last 6 months; and
 - (iii) Within the past year; and
 - (iv) The number of loops, by type (*i.e.*, analog UNE, DS-1 UNE, analog special access, DS-1 Special Access, etc.) in-service at each collocation as of September 30, 2003.

AT&T 003 Re: Switch Triggers – Self Provisioning

Identify by wire center each unaffiliated competitive switch provider that you assert qualifies as a retail self provider and detail the basis upon which you believe such entity qualifies as a self provider, including the geographic markets within which each unaffiliated competitive switch provider is providing service and the product and customer markets reached by each unaffiliated competitive switch provider.

- a. Produce any documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a self provider and include the product, customer and geographic market served by such self provider;

- b. Identify by wire center each wholesale alternative to ILEC circuit switching and provide the basis upon which you believe such entity qualifies as a self-provider; and
- c. Produce any documents, information, notes, work papers, or communications from the identified company in your possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.

AT&T 004 Re: Switch Triggers – Self Provisioning

For each carrier listed in the previous question, please provide for each switch you claim is used for self provisioning:

- a. The 11-digit CLLI code of the switch as it appears in the LERG, the V&H coordinates of the switch from the LERG, and claimed function of the switch (e.g., stand-alone, host, or remote);
- b. For each applicable CLLI code: the associated LATA number; MSA number (if applicable); the V&H coordinates; the L&L coordinates; the UNE loop rate zone; the special access density zone and whether interstate special access pricing flexibility is applicable for that end office;
- c. The location of each collocation arrangement that you claim is interconnected to the switch;
- d. The number of loops, by type (*i.e.*, analog UNE, DS-1 UNE, analog special access, DS-1 Special Access, etc.) provisioned to each collocation:
 - (i) Within the last 3 months,
 - (ii) Within the last 6 months,
 - (iii) Within the past year; and
 - (iv) The number of loops, by type (*i.e.*, analog UNE, DS-1 UNE, analog special access, DS-1 Special Access, etc.) in-service at each collocation as of September 30, 2003.

AT&T 005: Re: Network and Market Demand – Switch Information

For each switch (*e.g.* circuit, packet, soft switch, etc.) that you have used or could use to provide local service in Utah (this would include switches located in other states that provide or have the ability to provide local exchange service in Utah) please provide the following information for the switch and/or the switch location:

- a. the physical location of each switch (*i.e.*, the street address);
- b. the area the switch serves (by wire center);
- c. the services provided by the switch;
- d. the utilized trunk line, trunk and processor capacity;
- e. the potential line, trunk and processor capacity;

AT&T 006: Re: Network and Market Demand – Switch Information

For each switch identified in AT&T 005, provide the following information:

- a. the total number of voice-grade equivalent lines served by the switch (by wire center)
- b. the number of voice-grade equivalent lines being provided to business customers
- c. the number of DS0 voice-grade equivalent lines being provided to business customers
- d. the number of voice-grade equivalent lines being provided to residential customers
- e. the switch type (*e.g.*, Lucent 5ESS);

AT&T 007 Re: Network and Market Demand – Switch Information

For each switch identified in AT&T 005, provide the following information:

- a. the 11-digit Common Language Location (“CLLI”) code of the switch;
- b. the vertical and horizontal (“V&H”) coordinates of the switch;
- c. function of the switch (*e.g.*, stand-alone, host, or remote); and
- d. whether each CLLI offers International Direct Distant Dialing (“IDDD”).

AT&T 008 Re: Network and Market Demand – Switch Information; Out of Region

For each switch (*e.g.*, circuit, packet, soft switch, etc.) that you have used or could use to provide local service outside of the territory for which you are an incumbent please provide the following information for the switch and/or the switch location:

- a. the physical location of each switch (*i.e.*, the street address);
- b. the area the switch serves (by wire center);
- c. the services provided by the switch;
- d. the utilized trunk line, trunk and processor capacity; and
- e. the potential line, trunk and processor capacity;

AT&T 009 Re: Network and Market Demand – Switch Information; Out of Region

For each switch identified in AT&T 008, provide the following information:

- a. the total number of voice-grade equivalent lines served by the switch (by wire center);
- b. the number of voice-grade equivalent lines being provided to business customers;
- c. the number of DS0 voice-grade equivalent lines being provided to business customers;

- d. the number of voice-grade equivalent lines being provided to residential customers; and
- e. the switch type (*e.g.*, Lucent 5ESS);

AT&T 010 Re: Network and Market Demand – Switch Information; Out of Region

For each switch identified in AT&T 008, provide the following information:

- a. the 11-digit CLLI code of the switch;
- b. the vertical and horizontal V&H coordinates of the switch;
- c. function of the switch (*e.g.*, stand-alone, host, or remote); and
- d. whether each CLLI offers IDDD.

AT&T 011 Re: Network and Market Demand – Switches, Upgrades

During the past 5 years, have you ever added processor capacity or peripheral equipment to one or more of your local switches due to:

- a. Increased usage; or
- b. Exhaust of the number of end-user lines that could be connected to the switch.

AT&T 012 Re: Network and Market Demand – Switches, Upgrades

If the answer to either part of AT&T 011 is yes, please identify each instance and:

- a. The nature of the upgrade performed.
- b. Whether you had other end-office switches within a 15-mile radius with capacity to handle additional lines.
- c. If the answer to b. is yes, whether you considered off-loading subscriber lines from the switch requiring the upgrade, and serving those lines from a different local switch. If you did not consider doing so, why not?
- d. If the answer to c. above is yes, produce any documents that refer, relate to, or discuss your consideration of off-loading such lines to a different local switch.

AT&T 013 Re: Network and Market Demand – Switches

What engineering guidelines and/or standards do you use to determine when, if ever, to serve customer lines from a switch other than the switch located at the customer's serving wire center?

- a. Under what conditions, if any, would you consider serving lines from a switch other than the one located in the customer's serving wire center?
- b. Please produce a copy of your switch engineering guidelines.

AT&T 014 Re: Network and Market Demand – Switches, Foreign Exchange

Do you currently provide any customers local exchange service, other than for foreign exchange service, from a switch located at a place other than the customer's serving wire center? If yes, identify:

- a. The wire centers and the number of affected lines at each of those wire centers;
- b. The circumstances that caused you to offer service in this manner; and
- c. Any additional charges imposed on the customer for this serving configuration.

AT&T 015 Re: Network and Market Demand – Loops

Provide the number of loops, by Central Office (by applicable CLLI code), in Utah that are currently served by each of the following:

- a. IDLC arrangements;
- b. NGDLC arrangements;
- c. UDLC arrangements; and
- d. Of the IDLC loops, please state how many loops are transferable to universal digital loop carrier (UDLC) without additional construction.

AT&T 016 Re: Network and Market Demand – Loops

Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops in Utah that you intend to serve via:

- a. IDLC loop arrangements; and
- b. NGDLC loop arrangements.

AT&T 017 Re: Network and Market Demand – Loops

Are there any customers being served via UNE-P today that could not be served via UNE-L (for example, if there were no copper to replace UDLC, etc.)? If so, please provide in detail the reasons why such customers could not be served via UNE-L, including the number of such customers by wire center or by CLLI code.

AT&T 018 Re: Network and Market Demand – NGDLC

Have you considered deploying NGDLC arrangements that packetize both the voice and data services? If so, please describe any such alternatives considered and produce any documents that refer, relate to or discuss your deployment of NGDLC arrangements that packetize both the voice and data services.

AT&T 019 Re: Network and Market Demand – DSL Capable Loops

By wire center, please provide the percentage of copper loops that are located within 18,000 feet of Qwest's Central Offices.

AT&T 020 Re: Network and Market Demand – Loops, Line Splitting

Identify the overall number and percentage of loops in Qwest territory in Utah that are currently provisioned on:

- a. All-copper loop facilities without pair-gain devices of any type (*e.g.*, analog pair gain, DAMLs, etc.).
- b. All-copper loop facilities with pair gain devices.
- c. All-copper loop facilities less than 18K feet in length.
- d. All-copper loop facilities greater than 18K feet in length.

AT&T 021 Re: Network and Market Demand – Loops, Line Splitting

Identify the overall number and percentage of loops in Qwest territory in Utah that are currently provisioned on:

- a. Fiber-fed DLC facilities that do not support DSL.
- b. Fiber-fed DLC facilities that do or will support DSL.

AT&T 022 Re: Network and Market Demand – Copper Loops, DLC

Please provide the number of lines served by DLC for which alternative copper loop facilities are currently not available.

AT&T 023 Re: Network and Market Demand – Copper Loops, Retirement

Describe with specificity your plans to retire any copper loop plant in Utah.

AT&T 024 Re: Network and Market Demand – Copper Loops, Retirement

Please provide a copy of any studies, reports, memorandum, email or documents describing your plans to retire any copper loop plant in Utah.

AT&T 025 Re: Network and Market Demand – Copper Loops, Retirement

Please describe with specificity the process you use in retiring a copper loop plant. Please specifically include in your answer the notice you provide to CLECs who have customers that provide service using the plant and what options will be available to CLECs providing voice and/or DSL service to customers served by the copper loop plant you plan to retire.

AT&T 026 Re: Network and Market Demand – Availability, T1s

9. For each month beginning in January 2000 and extending to the most recent month for which data is available, provide the following information:

- a. The total number of orders for T-1 exchange access lines/trunks that were rejected due to a determination by you that facilities were not available;
- b. The total number of orders for T-1 intraLATA Special Access lines that were rejected due to a determination by you that facilities were not available; and
- c. The total number of orders for T-1 UNEs that were rejected due to a determination by you that facilities were not available.

AT&T 027 Re: Network and Market Demand – Availability, T1s

9. Please provide any written practice(s) or, if no such practice exists, provide a narrative explaining your practices and policies relative to the rearrangement and reuse of existing facilities when facilities are initially unavailable at a particular customer location to fulfill an order for a service requiring a T-1 facility. Indicate whether the same or different practices apply in the case of retail service orders placed by end users, orders for special access placed by carriers, or orders for T-1 UNEs placed by carriers, including IntraLATA Special Access T-1, and UNE T-1. In your response, please address the following circumstances:

- a. The T-1 common equipment has no spare ports/slots, but one or more of the ports/slots is assigned to a circuit that is no longer in use because service has been discontinued. Under your applicable policies and procedures, could the technician reuse such a port/slot in order to fulfill the new order? Describe any differences that might occur as between orders for IntraLATA Special Access T-1, and UNE T-1.
- b. There is no unassigned T-1 copper or fiber distribution facility available to fulfill the order, but one or more T-1 distribution facilities along the route passing the customer location is assigned to a circuit that formerly served a customer at a nearby location, but is no longer in use because that service had been discontinued. Under your applicable policies and procedures, could the technician reuse such a distribution facility in order to fulfill the new order? Describe any differences that might occur as between orders for IntraLATA Special Access T-1, and UNE T-1.

AT&T 028 Re: Network and Market Demand – Interoffice Traffic

In Utah, please identify, by name and location, each of your Central Offices that do not have fiber connectivity for purposes of interoffice transport.

AT&T 029 Re: Network and Market Demand – Remote Terminals

In Utah, please provide your current total number of Remote Terminals.

AT&T 030 Re: Network and Market Demand – CLEC Resale Lines

For each of the serving methods listed below, provide the total number of DS-0 (or voice grade analog) lines in each wire center being served by CLECs:

- a. Resale Residential; and
- b. Resale Business;

AT&T 031 Re: Network and Market Demand – CLEC UNE-L Lines

For each of the serving methods listed below, provide the total number of DS-0 (or voice grade analog) lines in each wire center being served by CLECs:

- a. UNE-L Residential; and
- b. UNE-L Business;

AT&T 032 Re: Network and Market Demand – CLEC UNE-P Lines

For each of the serving methods listed below, provide the total number of DS-0 (or voice grade analog) lines in each wire center being served by CLECs:

- a. UNE-P Residential; and
- b. UNE-P Business

AT&T 033 Re: Network and Market Demand – Request for Interconnection

9. Identify any instances where you initiated a request for interconnection with a CLEC. For each such instance, provide the identity of the CLEC, the date at which such request was first made to the CLEC, the date at which the CLEC responded with a draft or template interconnection agreement, the date at which you provided your responsive comments/red-lines to the draft or template agreement, whether and the date at which an interconnection agreement was successfully negotiated between you and the CLEC. In the event that no such successful negotiation took place, indicate what subsequent actions or initiatives were taken by you (*e.g.*, mediation, arbitration) to secure an agreement, and the current status of the agreement or lack thereof.

AT&T 034 Re: Network and Market Demand – Business Customers

With regard to business customer locations that you serve using 24 or fewer analog lines, for the most recent quarter available, delineate, by wire center, the business customers by the number of such analog lines, through and including those business premises with 24 analog lines (*i.e.*, identify those with a single line, two analog lines, three analog lines, etc. through 24 analog lines). Also, with regard to business customer locations using more than 24 analog lines, for the most recent quarter available, delineate, by wire center, the number of business customer locations and the average total lines in those locations.

AT&T 035 Re: Network and Market Demand – Number of Residential and Business Lines

Provide separately the number of primary and secondary residential and DS0-equivalent business switched exchange access lines for end of year 1996 through 2002 and for year 2003 through September 30, 2003.

AT&T 036 Re: Network and Market Demand – Number of Access Lines

Specify by wire center and, within each wire center, by UNE and retail rate zone, if applicable, the number of primary, secondary and total switched exchange access lines, disaggregated by month from January 1999 to present.

AT&T 037 Re: Network and Market Demand – Residential Access Lines

Provide, by wire center and by exchange:

- a. the total residential access lines subscribed to each category of local exchange service (*i.e.*, message rate, flat rate, etc.), by Rate Group;
- b. the total access lines subscribed to Lifeline service;
- c. The average monthly minutes for use of subscribers to Flat Rate service, by Rate Group;

AT&T 038 Re: Network and Market Demand – Residential Access Lines

Provide, by wire center and by exchange:

- a. The average monthly number of message units for subscribers to Message Rate service, by Rate Group;
- b. The total residential access lines by wire center not subscribed to an optional local calling package plan; and
- c. The average monthly billed amount to those residential access lines not subscribed to an optional calling plan.

AT&T 039 Re: Network and Market Demand – Minutes of use per Line

Please provide the current average total monthly minutes of use separately for business and residential lines by wire center and provide a complete breakdown of each category of usage by type (*e.g.*, local, intraLATA intrastate, intraLATA interstate, interLATA intrastate, interLATA interstate, international, 800 service, etc.).

AT&T 040 Re: Network and Market Demand – Number of Residential and Business Lines

Please provide the current average number of voice grade equivalent lines you provide per residential and business customer in Utah.

AT&T 041 Re: Network and Market Demand

Please provide a copy of the completed Part II (Wireline and Fixed Wireless Local Telephone) to the FCC's Form 477 (Local Competition and Broadband Reporting Data Request) with data as of June 2003 for Utah.

AT&T 042 Re: Network and Market Demand

Please provide a copy of the completed Part II (Wireline and Fixed Wireless Local Telephone) to the FCC's Form 477 (Local Competition and Broadband Reporting Data Request) with data as of June 2003 for Utah.

AT&T 043 Re: Customer and Economic Market Forces – Average Residential Revenue

For each year 1996 inclusive through 2002, and for 2003 through September 30, 2003, please provide the following average revenue, per residential customer and per residential line identified in response to AT&T 035, received by you and/or your corporate predecessor, by wire center separately for:

- a. Local exchange service;
- b. Discretionary services, including vertical services;
- c. IntraLATA toll revenues;
- d. Intrastate switched access revenues, identifying separately intraLATA access revenues from interLATA access revenues; and
- e. Interstate switched access revenues, identifying separately intraLATA access revenues from interLATA access revenues.
- f. Nonregulated services furnished in connection with, and billed to, the subscriber access line (*e.g.*, voice mail, inside wire maintenance, OS/DA).
- g. Reciprocal compensation;
- h. Data services, and
- i. DSL

AT&T 044 Re: Customer and Economic Market Forces – Average Business Revenue

For each year 1996 inclusive through 2002, and for 2003 through September 30, 2003, please provide the following average revenue, per business customer and per business line identified in response to AT&T 035, received by you and/or your corporate predecessor, by wire center separately for:

- a. Local exchange service;
- b. Discretionary services, including vertical services;
- c. IntraLATA toll revenues;

- d. Intrastate switched access revenues, identifying separately intraLATA access revenues from interLATA access revenues; and
- e. Interstate switched access revenues, identifying separately intraLATA access revenues from interLATA access revenues.
- f. Nonregulated services furnished in connection with, and billed to, the subscriber access line (*e.g.*, voice mail, inside wire maintenance, OS/DA).
- g. Reciprocal compensation;
- h. Data services, and
- i. DSL

AT&T 045 Re: Customer and Economic Market Forces – “Take Rates”

Please provide the average “take rate,” by wire center, for intraLATA toll, interLATA toll, vertical features (by feature), inside wire maintenance, voice mail and DSL service

AT&T 046 Re: Customer and Economic Market Forces – IntraLATA toll usage, Residential

By wire center, provide the total number of your intraLATA toll residential customers with average intraLATA toll usage of:

- a. Less than 30 minutes per month;
- b. 30 to 60 minutes per month;
- c. 60 to 120 minutes per month;
- d. 120 to 180 minutes per month; and
- e. More than 180 minutes per month.

AT&T 047 Re: Customer and Economic Market Forces – IntraLATA toll usage, Business

By wire center, provide the total number of your intraLATA toll business DS0 loop customers with average intraLATA toll usage of:

- a. Less than 30 minutes per month;
- b. 30 to 60 minutes per month;
- c. 60 to 120 minutes per month;
- d. 120 to 180 minutes per month; and
- e. More than 180 minutes per month.

AT&T 048 Re: Customer and Economic Market Forces – InterLATA toll usage, Residential

By wire center (or other disaggregated geographic breakout) provide the total number of your long distance affiliates’ interLATA residential customers with average interLATA usage of:

- a. Less than 30 minutes per month;
- b. 30 to 60 minutes per month;
- c. 60 to 120 minutes per month;
- d. 120 to 180 minutes per month; and
- e. More than 180 minutes per month.

AT&T 049 Re: Customer and Economic Market Forces – InterLATA toll usage, Business

By wire center (or other disaggregated geographic breakout) provide the total number of your long distance affiliates' interLATA business DS0 loop customers with average interLATA usage of:

- a. Less than 30 minutes per month;
- b. 30 to 60 minutes per month;
- c. 60 to 120 minutes per month;
- d. 120 to 180 minutes per month; and
- e. More than 180 minutes per month.

AT&T 050 Re: Customer and Economic Market Forces – InterLATA toll revenues

Provide the average interLATA and intraLATA revenue per subscriber for your long distance affiliates, by wire center.

- a. for residential customers;
- b. for business DS0 loop customers.

AT&T 051 Re: Customer and Economic Market Forces – Switched Access

9-Identify any local exchange carriers in Utah other than you from which any of your long distance affiliates intend to or already have agreed to purchase switched carrier access services, and specify precisely what types of switched access services will be purchased from each such carrier.

AT&T 052 Re: Customer and Economic Market Forces – Qwest Toll Services

Does Qwest or any of its long distance affiliates provide interLATA and intraLATA services in Utah to customers served by other local exchange carriers? If so, indicate which other LEC customers will be able to obtain intraLATA and interLATA long distance services from Qwest or its long distance affiliates.

AT&T 053 Re: Competitive and Economic Market Forces – Switching

Have you ever considered leasing switching capacity from a third party to provide retail services:

- a. Within your certificated incumbent territory (*i.e.*, in-region)?

b. Outside your certificated incumbent territory (*i.e.*, out-of-region)?

AT&T 054 Re: Competitive and Economic Market Forces– Substitutable Services

For each mass market service you offer, identify every provider that actively offers services that you consider substitutes, excluding wireless providers and services. For each competitive service identified, provide your exchanges and/or wire centers where the substitute is currently being offered.

AT&T 055 Re: Competitive and Economic Market Forces – Substitutable Services

For each business service you offer, identify every provider that actively offers services that you consider substitutes, excluding wireless providers and services. For each service identified, provide your exchanges and/or wire centers where the substitute is currently being offered.

AT&T 056 Re: Competitive and Economic Market Forces – Fixed Wireless

Do you contend that all of the business services you now provide can be provided over fixed wireless in Utah? If so, do you contend that fixed wireless facilities are available to provide commercial volumes of business services in Utah?

AT&T 057 Re: Competitive and Economic Market Forces – Winback

What period of time do you use to define a winback (and therefore churn)? How many mass-market local winbacks have you achieved in Utah by quarter since 1999? What percentage of those customers receive a bundle of services that include interLATA long distance service?

AT&T 058 Re: Competitive and Economic Market Forces – OSS

Do you have pre-ordering and ordering processes that allow a CLEC to use one wholesale provider for switching and another for the loop, or otherwise use multiple vendors in its service arrangement? If so, please provide a copy of any documents describing the processes identified.

AT&T 059 Re: Competitive and Economic Market Forces – Costs

Please provide your variable costs and marginal costs for local, long distance and broadband services individually and as part of a bundled offering.

AT&T 060 Re: Customer and Economic Market Forces – Cost of Basic Exchange Service

Do you contend that your current rates for any basic exchange service in any area is below your cost to provide that service? If so, please identify each such scenario,

location and the price that you would need to charge to recover your costs. Please also provide the basis for this analysis.

AT&T 061 Re: Network and Market Demand – Average Cost Per Line

Provide the average total cost per line for each of the past two years that Qwest has incurred to install and maintain lines used to serve mass market customers (residential customers and business customers that are served by 1-3 voice-grade equivalent lines at one location, or are otherwise included in the definition of mass market customer as determined by the Utah Commission. Provide a breakdown of each cost component (*e.g.*, investment-related costs, network operations, maintenance, and SG&L) that is part of the average total cost per line, identifying the type and amount of each cost. Produce all documents that reflect, refer or relate to the information provided in your response to this request.

AT&T 062 Re: Competitive and Economic Market Forces – Costs, Transport

For each of the last 10 new interoffice fiber facilities that you have constructed in Utah, please provide:

- a. The initial project business case;
- b. Any requests for bids and all responsive documents;
- c. A complete description of the project including routes and materials requirements; and
- d. Final “actual” booked costs for the project.

AT&T 063 Re: Competitive and Economic Market Forces – Price Reductions

Identify and describe any constraints (if any) on your ability to:

- a. Reduce prices in relation to some measure of cost (*e.g.*, price floor based on TELRIC);
- b. Target price reductions to geographic areas; and
- c. Target price reductions to types of customers (including individual customers).

AT&T 064 Re: Competitive and Economic Market Forces – Competitive Responses

Produce any documents referring or relating to any pricing offers, advertising campaigns, packaged offerings, waiver of fees, term contract offerings, marketing strategies you have evaluated or implemented in consideration of one or more CLEC’s planned or actual entry into a local service market.

AT&T 065 Re: Competitive and Economic Market Forces – Line Growth

On an individual Central Office, end office, and serving wire center basis, please provide the recent history of line growth/line loss for:

- a. Primary voice lines;
- b. Additional voice lines; and
- c. Broadband/data lines.

AT&T 066 Re: Competitive and Economic Market Forces – Financial Information by Services

For each year 1996 through 2002 inclusive, and for this year through September 30, 2003, please provide the following financial information: (i) total operating revenues; (ii) total operating expenses; (iii) average Telephone Plant in Service (TPIS); (iv) average net investment/net telephone plant; (v) realized return on investment as well as return on equity for you and/or for your corporate predecessor, separately, for total company all services (regulated and nonregulated).

AT&T 067 Re: Competitive and Economic Market Forces – Financial Information by Services

For each year 1996 through 2002 inclusive, and for this year through September 30, 2003, please provide the following financial information: (i) total operating revenues; (ii) total operating expenses; (iii) average Telephone Plant in Service (TPIS); (iv) average net investment/net telephone plant; (v) realized return on investment as well as return on equity for you and/or for your corporate predecessor, separately, for jurisdictionally intrastate regulated services.

AT&T 068 Re: Competitive and Economic Market Forces – Financial Information by Services

For each year 1996 through 2002 inclusive, and for this year through September 30, 2003, please provide the following financial information: (i) total operating revenues; (ii) total operating expenses; (iii) average Telephone Plant in Service (TPIS); (iv) average net investment/net telephone plant; (v) realized return on investment as well as return on equity for you and/or for your corporate predecessor, separately, for jurisdictionally interstate regulated services.

AT&T 069 Re: Competitive and Economic Market Forces – Financial Information by Services

For each year 1996 through 2002 inclusive, and for this year through September 30, 2003, please provide the following financial information: (i) total operating revenues; (ii) total operating expenses; (iii) average Telephone Plant in Service (TPIS); (iv) average net investment/net telephone plant; (v) realized return on investment as well as return on equity for you and/or for your corporate predecessor, separately, for total company regulated services.

AT&T 070 Re: Competitive and Economic Market Forces – Financial Information by Services

For each year 1996 through 2002 inclusive, and for this year through September 30, 2003, please provide the following financial information: (i) total operating revenues; (ii) total operating expenses; (iii) average Telephone Plant in Service (TPIS); (iv) average net investment/net telephone plant; (v) realized return on investment as well as return on equity for you and/or for your corporate predecessor, separately, for services classified as Non-Regulated per 47 C.F.R. 64.901.

AT&T 071 Re: Competitive and Economic Market Forces – Financial Information by Services

For each year 1996 through 2002 inclusive, and for this year through September 30, 2003, please provide the following financial information: (i) total operating revenues; (ii) total operating expenses; (iii) average Telephone Plant in Service (TPIS); (iv) average net investment/net telephone plant; (v) realized return on investment as well as return on equity for you and/or for your corporate predecessor, separately, for services classified as Non-Regulated by the Utah commission.

AT&T 072 Re: Competitive and Economic Market Factors – Out-of-Region, Wholesale Switching

Provide any documents that refer, relate to, or discuss the examination or consideration by you of offering wholesale switching in any out-of-region local market.

AT&T 073 Re: Mass Market – Identification

Identify any and all purposes for which you use each of the following operational, economic, or marketing differentiations:

- a. LATA;
- b. Wire center;
- c. MSA;
- d. Disaggregated geographic area for performance measurement data collection and reporting;
- e. Entire state;

AT&T 074 Re: Network and Market Demand – Mass Market – Identification

Identify any and all purposes for which you use each of the following operational, economic, or marketing differentiations:

- a. Entire service area; and
- b. Other level of differentiation (specify).

AT&T 075 Re: Mass Market – Identification

Indicate whether local or state governmental agencies, such as Utah offices, universities and/or university housing are considered residential customers or mass market business customers.

AT&T 076 Re: Mass Market – Market Share

Will you rely on any market share studies in Utah or your territory to contest the FCC's finding of impairment for mass market switching? If yes, provide the studies.

AT&T 077 Re: Mass Market – Reports and Studies

Will you rely on any third party reports, studies or articles regarding the market presence of CLEC UNE or facilities-based providers? If yes, provide the reports, studies or articles.

AT&T 078 Re: Mass Market – Switching, Delisted UNEs

What is the “market rate” that you propose to charge other carriers for access to de-listed local switching functionality?

- a. Explain the basis for determining the “market rate,” including a description of the market, and any competitors to your switching functionality.
- b. Explain the source of each difference between the proposed just and reasonable rate for de-listed local switching and the approved TELRIC rate.
- c. Provide the new return-on-equity achieved by the proposed just and reasonable rate for de-listed local switching.

AT&T 079 Re: Mass Market – DSL, UNE -L

Please describe with specificity the process by which CLECs offering voice service to a mass-market customer utilizing unbundled local switching could provide xDSL service using UNE-L. Please also provide the following information regarding the process:

- a. Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through. If orders do flow through, please state the percentage of the service orders that flow through to completion;
- b. Please list the recurring and nonrecurring charges the CLEC would incur;
- c. Please provide the average service outage experienced by the end user customer;
- d. Please state whether the loop and switch port would be reused or whether new facilities would be provisioned; and

- e. Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain any such effects in detail.

AT&T 080 Re: Mass Market – DSL, EELs

Please describe with specificity the process by which CLECs offering voice service to a mass-market customer utilizing unbundled local switching could provide xDSL service using EELs. Please also provide the following information regarding the process:

- a. Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through. If orders do flow through, please state the percentage of the service orders that flow through to completion;
- b. Please list the recurring and nonrecurring charges the CLEC would incur;
- c. Please provide the average service outage experienced by the end user customer;
- d. Please state whether the loop and switch port would be reused or whether new facilities would be provisioned; and
- e. Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain any such effects in detail.

AT&T 081 Re: Mass Market – DSL, UNE-L

Please describe with specificity the process by which CLECs offering voice service to a mass market customer utilizing its own switches could provide xDSL service using UNE-L. Please also provide the following information regarding the process:

- a. Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through. If orders do flow through, please state the percentage of the service orders that flow through to completion;
- b. Please list the recurring and nonrecurring charges the CLEC would incur;
- c. Please provide the average service outage experienced by the end user customer;
- d. Please state whether the loop would be reused or whether new facilities would be provisioned; and
- e. Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain any such effects in detail.

AT&T 082 Re: Mass Market – DSL, EELs

Please describe with specificity the process by which CLECs offering voice service to a mass market customer utilizing its own switches could provide xDSL service using EELs. Please also provide the following information regarding the process:

- a. Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through. If orders do flow through, please state the percentage of the service orders that flow through to completion;
- b. Please list the recurring and nonrecurring charges the CLEC would incur;
- c. Please provide the average service outage experienced by the end user customer;
- d. Please state whether the loop would be reused or whether new facilities would be provisioned; and
- e. Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain any such effects in detail.

AT&T 083 Re: Mass Market – DSL

Please describe with specificity the process by which CLECs providing voice and xDSL service to a mass-market customer utilizing unbundled local switching for the voice service could perform the following activities:

- a. Disconnect the data service, but retain the voice service;
- b. Migrate the data service to another provider, but retain the voice service;
- c. Migrate the voice service to another provider, but retain the data service; and
- d. Disconnect the voice service, but retain the data service.

AT&T 084 Re: Mass Market – DSL

For each scenario described in AT&T 083, please also provide the following information:

- a. Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through. If orders do flow through, please state the percentage of the service orders that flow through to completion;
- b. Please list the recurring and nonrecurring charges the CLEC would incur;
- c. Please provide the average service outage experienced by the end user customer;
- d. Please state whether the loop and switch port would be reused or whether new facilities would be provisioned; and
- e. Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain any such effects in detail.

AT&T 085 Re: Mass Market – DSL

Please describe with specificity the process by which CLECs providing voice and xDSL service to a mass-market customer utilizing their own switches and a UNE loop could perform the following activities:

- a. Disconnect the data service, but retain the voice service;

- b. Migrate the data service to another provider, but retain the voice service;
- c. Migrate the voice service to another provider, but retain the data service; and
- d. Disconnect the voice service, but retain the data service.

AT&T 086 Re: Mass Market – DSL

For each scenario described in AT&T 085, please also provide the following information:

- a. Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through. If orders do flow through, please state the percentage of the service orders that flow through to completion;
- b. Please list the recurring and nonrecurring charges the CLEC would incur;
- c. Please provide the average service outage experienced by the end user customer;
- d. Please state whether the loop would be reused or whether new facilities would be provisioned; and
- e. Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain any such effects in detail.

AT&T 087 Re: Collocation – Experience and History

Provide the following data for each of your Central Offices and Remote Terminals in which one or more CLECs maintains a collocation presence:

- a. Identification of the wire center (CLLI code);
- b. The area served by the Central Office or Remote Terminal;
- c. The total number of switched exchange access lines currently being served at retail by you;
- d. The total amount of space currently being used by collocators; and
- e. The total amount of space available for use by collocators (which does not include space reserved for you or your affiliates).

AT&T 088 Re: Collocation – Experience and History

Provide the following data for each of your Central Offices and Remote Terminals in which one or more CLECs maintains a collocation presence:

- a. The number of CLECs collocated in the wire center;
- b. The name(s) of any CLECs collocated in the wire center and the date of occupancy;
- c. The types of service(s) being offered by each of the collocated CLECs to their customers (retail local residential, retail local mass market (small) business, retail data services, retail enterprise services, or wholesale services (specify nature)); and

- d. The number of residential and business lines that each CLEC serves out of its collocation space, via UNE-L.
- e. Specify your policy with respect to disconnecting collocation arrangements for non-payment.

AT&T 089 Re: Collocation – Experience and History

Provide the following data for each of your Central Offices and Remote Terminals in which one or more CLECs maintains a collocation presence:

- a. Indicate the number of pending disconnect orders for collocation arrangements;
- b. Collocation space occupied by CLECs who are no longer operating.
- c. Whether the Central Office is manned or unmanned;
- d. The number of cross-connects in service to the wire center; and
- e. The number of UNE loops provisioned to each collocating carrier in the past 3 months.

AT&T 090 Re: Collocation – Experience and History

Identify the number of your Central Offices in Utah in which there are no current collocation arrangements provided to CLECs. For each identified Central Office, please identify the name and location of the Central Office, and state whether each such Central Office is manned or unmanned.

AT&T 091 Re: Collocation – Experience and History

Identify the number of your Central Offices in which more than one CLEC was collocated in Utah as of:

- a. December 31, 1996;
- b. December 31, 2000; and
- c. March 31, 2003.

AT&T 092 Re: Collocation – Availability

What is the maximum number of collocators you can accommodate at each Central Office and each Remote Terminal in Utah? If you have not developed this information, what are the variables you would need to consider to make this determination?

AT&T 093 Re: Collocation – Availability

Do you have space for additional physical collocators in every wire center? List those wire centers in which you cannot accommodate at least 3 more collocators (assuming that each collocator will require at least a 10x10 foot cage).

AT&T 094 Re: Collocation – Experience and History

Identify any cases where you have refused collocation requests since January 1, 2001. Indicate the ultimate resolution of the dispute.

AT&T 095 Re: Collocation – Use Restrictions

Please describe with specificity any restrictions on the type of equipment that CLECs can place in a collocation space obtained from Qwest. If restrictions vary by type of collocation space, please identify such restrictions by type of collocation space.

AT&T 096 Re: Hot Cuts – Historical Quantities

Please provide UNE Loop quantities provisioned for each quarter from January 2001 to the present, stating for each quarter and each wire center the:

- a. Average number of lines provisioned on a daily basis;
- b. Fewest number of lines provisioned in a work day; and
- c. Maximum number of lines provisioned in a work day.

AT&T 097 Re: Hot Cuts – Quantities and Charges

For UNE Loop lines provisioned for CLECs, identify separately the quantities of business and residential lines, and the hot cut charges (average per line and total) on a monthly basis from January 2001 to present, distinguishing between provisioning done on a project or negotiated basis and those lines not provisioned on a project or negotiated basis and between those processed as coordinated installation with cooperative testing versus coordinated installation without cooperative testing.

AT&T 098 Re: Hot Cuts – Capacity

On an individual wire center basis, identify the current total number of UNE loops per day that can be provisioned by you, where “provisioned” includes migration of customers from ILEC-to-CLEC, from CLEC-to-CLEC, and from CLEC-to-ILEC. Identify how the maximum quantities of lines that may be provisioned may or may not be dependent on: (i) how many different CLECs’ “hot cut” requests are being provisioned on a given day, (ii) whether requests are being handled on a coordinated installation with cooperative testing, coordinated installation without cooperative testing, or project/negotiated basis, (iii) how many Central Offices in Utah have scheduled cutovers on the same day, (iii) whether you also are processing “winbacks” of customers currently served by CLECs using UNE-L, (iv) whether any of the “hot cuts” are CLEC-to-CLEC migrations, and (v) any other relevant factors (describe).

AT&T 099 Re: Hot Cuts – Plans to Increase Capacity

Detail any plans to increase current capacity to provision UNE loops. Provide any testing performed or planned and any studies done or planned (including their underlying

assumptions and supporting data) to determine work force, process and system scalability to meet an increasing demand for UNE-L provisioning.

AT&T 100 Re: Hot Cuts – Capability

Has Qwest ever communicated to any CLEC the total number of unbundled loop cutovers Qwest is capable of performing per central office per day? Or in any specific geographic area per day? If yes, provide the substance of those communications, including all documents relating to limitations on the number of hot cuts that can be performed. If there are differences in the maximum number of cutovers that can be performed in a Central Office or geographic area, explain the reasons for the differences.

AT&T 101 Re: Hot Cuts – OSS

Describe current process flows supporting “hot cuts” on a coordinated installation with cooperative testing, coordinated installation without cooperative testing, and project/negotiated basis. The description should include any variations that exist when the customer is served over all-copper facilities, hybrid fiber-copper facilities using IDLC, and hybrid fiber-copper facilities using UDLC or NGDLC. The description should include any variations in the process flows depending on whether the provisioning is a transition of a CLEC customer currently served on UNE-P (same CLEC, a migration of a UNE-L served customer to another CLEC’s switch (CLEC to CLEC), a transition of an ILEC customer to CLEC’s UNE-L based service (ILEC to CLEC), or a “winback” of a currently served CLEC UNE-L customer to the ILEC (CLEC to ILEC)).

AT&T 102 Re: Hot Cuts – OSS, Process Improvements

Describe any proposed improvements to your current process flows for “hot cut” provisioning, including any proposed plans for a batch hot cut process, and the dates by which such improvements are planned to be proposed and implemented. Described improvements should cover the scenarios identified in AT&T 101, and specifically include the TELRIC rate for the process as revised, and a description of the applicable performance measurement standards.

AT&T 103 Re: Hot Cuts – OSS

Describe and document current and planned OSS functionality and requirements to support Pre-ordering, Ordering, Provisioning/Status Inquiry and Communication, Maintenance/Repair and Billing for voice-grade, DSL capable, and line-split UNE loops on all-copper facilities, hybrid fiber-copper facilities using IDLC, and hybrid fiber-copper facilities using UDLC or NGDLC. Your response should include process flows, requirements, and business rules (identifying data characteristics associated with each combination of req type/activity code) for:

- a. transitioning an existing customer’s service to UNE-L (ILEC to CLEC),
- b. transitioning a customer served on UNE-L by one CLEC to another CLEC serving a customer using UNE-L (CLEC to CLEC), and

- c. transitioning your existing UNE-P customer to service as a UNE-L customer (same CLEC).

AT&T 104 Re: Hot Cuts – OSS, LSR

For your responses to AT&T 103, detail which Local Service Requests (“LSRs”) associated with each scenario will be handled on a fully automated, flow-through basis. Identify any limitations on the number of lines that can be included on a single UNE-L LSR, and your anticipated proposals for changing such limitations.

AT&T 105 Re: Hot Cuts – OSS, LSR

Does ILEC have in place a single LSR process to migrate UNE loops from ILEC to CLEC, CLEC to ILEC and CLEC to CLEC for each of the following?

- a. Voice service;
- b. Data service; and
- c. Voice and data service.

AT&T 106 Re: Hot Cuts – OSS, LSR

If Qwest has a single LSR process to migrate UNE loops, state whether the process provides flow through capability, and provide:

- a. The capacity of each process in terms of number of UNE loops per day that can be migrated; and
- b. State the percentage of the service orders that flow through to completion.

AT&T 107 Re: Hot Cuts – OSS, LSR

Does Qwest have plans to increase its capacity to perform single LSR migrations? If so, provide the planned capacity for each type of migration and service.

AT&T 108 Re: Hot Cuts – OSS, LSR

To the extent that you do not today offer CLECs the ability to submit one Local Services Request (LSR) to support any of the CLEC-initiated scenarios described in AT&T 103, on a one-service order, fully-electronic basis, describe any planned improvements and identify when you project delivering the new functionality. Include any requirement changes that may be required, but for which OBF or other standards bodies have not yet released guidelines, and which may be subject to change management plan requirements.

AT&T 109 Re: Hot Cuts – OSS, LSR

Provide any testing and studies of the scalability of end-to-end electronic systems and manual OSS processes to migrate customers from one CLEC to another CLEC or to migrate customers from UNE-P loops to UNE Loops.

AT&T 110 Re: Hot Cuts – OSS

If UNE-P is unavailable, which ILEC and CLEC systems and processes need to be established, altered or enhanced to accommodate facilities-based local telecommunications competition, including but not limited to, updates/upgrades to PSAP/E911, NPAC/number portability, directory assistance, directory listings, white pages, and electronic access to both ILEC and CLEC customer service records?

AT&T 111 Re: Hot Cuts – OSS

Please describe the impact on any of your systems and databases associated with migrating a UNE Loop used in conjunction with unbundled switching to a UNE Loop used in conjunction with CLEC provided switching. Please specifically state whether circuits inventoried as UNE-P loops must be migrated to a different inventory system.

AT&T 112 Re: Hot Cuts – OSS

Is UNE-P treated as a designed or non-designed circuit in your inventory systems? Is UNE-L treated as a designed or non-designed circuit in your inventory systems? Please describe the impact of migrating a non-designed circuit to a designed circuit.

AT&T 113 Re: Hot Cuts – Loop Testing

Is MLT testing available with UNE-Loops? If not, what type of testing is available to a CLEC utilizing UNE-Loops? Must you install test access points for manual testing? Must the CLEC install terminal equipment? Is there a capacity constraint on the test access points that can be installed? If so, is the capacity constraint associated with the manual testing?

AT&T 114 Re: Hot Cuts - OSS

For each month since January 1, 2001, provide the number of and the total charges assessed for unbundled loop cutovers when the “CHC” field on the LSR form is populated with a “Y”, for existing customers by wire center, separated between each type or classification of cutover provided by ILEC, including, but not limited to, “coordinated installation with cooperative testing,” “coordinated installation without cooperative testing,” “frame due time” or “project coordinated installation” cutovers.

AT&T 115 Re: Hot Cuts – Capability

State the highest number of unbundled loop cutovers, when the “CHC” field on the LSR form is populated with a “Y,” Qwest has ever performed in a single day for each Central Office.

AT&T 116 Re: Hot Cuts - Capability

State, for the most recent 30, 60 and 90-day periods for which data are available, the average number of lines Qwest processes on an order when the “CHC” field on the LSR

form is populated with a “Y”. State the time period used to develop the averages provided and the number of observations used to develop the average.

AT&T 117 Re: Hot Cuts – Personnel Time

Provide the average Qwest personnel time attributable to a single cutover on a single unbundled loop order, separated between each type or classification of cutover provided by ILEC, including, but not limited to, “coordinated installation with cooperative testing,” “coordinated testing without cooperative testing,” “frame due time” or “project coordinated installation” cutovers.

AT&T 118 Re: Hot Cuts – Personnel Time

Provide the average Qwest personnel time attributable to multiple cutovers contained on a single unbundled loop order, separated between each type or classification of cutover provided by ILEC, including, but not limited to, “coordinated installation with cooperative testing,” “coordinated installation without cooperative testing,” “frame due time” or “project coordinated installation” cutovers.

AT&T 119 Re: Hot Cuts – OSS

What processes do you have in place with regard to directory listings, E911 and LIDB when a UNE-P loop is migrated to UNE-Loop? Are there capacity constraints? What is the process for ensuring the accuracy of the records?

AT&T 120 Re: Hot Cuts - Restoration

Describe in detail any process Qwest has to restore service if an end-user experiences problems resulting in loss of service during a hot cut.

AT&T 121 Re: Hot Cuts – OSS, Winback

Describe process flows supporting, and record and database changes associated with, your “winback” of a customer which had been served by a CLEC using UNE-L. For any descriptions and documentation relating to “planned” as opposed to presently available OSS, provide the planned or projected release date.

AT&T 122 Re: Hot Cuts – Winbacks

For each month since January 1999, please provide the number of loop cutovers by wire center that resulted in the loop being swung back to your switch, separated by those that met the provisioning due date, the number within 10 days of the provisioning due date and the number beyond 10 days of the provisioning due date.

AT&T 123 Re: Hot Cuts – CLEC Complaints

Provide documentation of any process or performance complaints from CLECs regarding your hot cut procedures and any internal analysis of potential improvements to the hot cut

process you currently use, including any description of planned improvements to the process.

AT&T 124 Re: Transport – Availability

Identify each instance in the last three years in which Qwest has denied a CLEC request for UNE interoffice transport in Utah on the basis of “no facilities available.”

AT&T 125 Re: Transport – Availability

Specify the CLLI code for each pair of end offices (if any) between which the CLEC requested UNE interoffice transport was denied due to “no facilities available.” Provide all documents, information or communications on which Qwest relies for its response to this request.

AT&T 126 Re: Transport – Availability

Identify each instance in the last three years in which Qwest has delayed provisioning a CLEC request for UNE interoffice transport on the basis of “no facilities available.”

AT&T 127 Re: Transport - Availability

In each instance where provisioning of a CLEC’s UNE interoffice transport was delayed due to “no facilities available” at the time of the request, describe in detail why there were no facilities available at the time of the request. How long was each such request delayed before facilities became available? Provide all documents, information or communications on which Qwest relies for its response to this request.

Submitted November 26, 2004.

**AT&T COMMUNICATIONS OF
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