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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 Federal Communications Commission Triennial Review Order Released August 21, 2003	)	DOCKET NO. 03-999-04

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

In responding to these requests, please refer to the definitions and instructions that were set forth in AT&T's First Set of Discovery Requests. Responses are due within 21 days (2/24).

AT&T 128: Re: Direct Testimony of Bryon S. Watson

Please provide in electronic format the CPRO for all LATAs and MSAs in the state of Utah.

AT&T 129: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Provide copies of all source materials referenced at footnote nos. 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 17, 20, 21, 27, 28, 29, 32, 36, 37, 38, 39, 40, 41, 42, 43, 44, 46, 47, 48, 49, 58, 60 (provide identity of source and any documentation to support the claim stated therein), 62, 63, 64, 65, 70, 73, 75, 76, 77, and 78. Provide copies of all source materials referenced for each of the Tables included in the Exhibit.

AT&T 130: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

The following statement appears at page 2:

> ... CLECs will choose different combinations of marketing activities and prices for service that achieve the best results for them, given their past decisions and the decisions of their competitors. CLECs that set lower prices will, all else being equal, achieve higher market shares and have lower churn rates. CLECs that spend more on customer acquisition will achieve a higher market share and achieve it more quickly, but will also need higher average revenues. Analysts and reviewers must be careful to consider the impact of changing one variable on the value of other interrelated variables before presenting a run of the CPRO Model.

Please describe with specificity how the CPRO considers "the impact of changing one variable on the value of other interrelated variables." Provide specific quantifications and formulas that are incorporated into the CPRO to account for such interactions. For example, with respect to the statement "CLECs that set lower prices will, all else being equal, achieve higher market shares and have lower churn rates," provide the specific price elasticity values that have been incorporated into the CPRO and provide the sources relied upon as the basis for those values. Also, provide any and all studies establishing the relationship between a CLEC's price and its churn rate, and indicate how this interaction is reflected in the CPRO.

AT&T 131: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Similarly, with respect to the statement "CLECs that spend more on customer acquisition will achieve a higher market share and achieve it more quickly," provide the specific quantification of the relationship between customer acquisition spending and market share that is incorporated into the CPRO, and provide the sources relied upon as the basis for these relationships.

At page 2, Mr. Watson cites the following statement from the TRO: "[W]e expect states to consider prices and revenues prevailing at the time of their analyses." Is it Qwest's

position that by the phrase "expect states to consider prices ... prevailing at the time of their analyses" as *precluding* states from also "considering" potential changes in price over the timeframe of the business case analysis?

a. If so, provide citation(s) to the TRO that are relied upon as a basis for that position.

b. If so, is it also Qwest's position that the state commissions must also only consider "revenues prevailing at the time of their analyses"?

AT&T 132: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 3, Mr. Watson advances the following with respect to the TRO: "... the TRO states that a business case of a CLEC must be based on an efficient carrier rather than a carrier-specific analysis." Is it Mr. Watson's contention that to be "efficient" a CLEC *must* also own and provide service over a facilites-based long distance network? If the answer is anything other than an unqualified negative, provide specific citations to the TRO, TA96, or other authorities relied upon as support for Mr. Watson's contention.

AT&T 133: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At pp. 3, Mr. Watson states "Because the model begins with current MCI prices, the modelers have chosen values for market share, customer acquisition costs, and churn that are consistent with those prices." Please explain how it was determined that the "values for market share, customer acquisition costs, and churn that are consistent with those prices." Also, please describe how the "values for market share, customer acquisition costs, and churn" would or should change in the model if different prices were assumed.

AT&T 134: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 3, Mr. Watson states: "In many cases, CLECs and analysts have forecasted values more favorable to the CLECs' claims of economic impairment for the churn and customer acquisition costs variables. To be internally consistent, the modelers have selected values consistent with today's experience rather than unsupported forecasts of the future."

a. Specify and provide sources for all of the "forecasted values more favorable to the CLECs' claims of economic impairment" that Mr. Watson contends that "CLECs and analysts have forecasted." Identify all "CLECs and analysts" whom Mr. Watson alleges to have made such forecasts.

b. Provide "support" for the "values consistent with today's experience" that Mr. Watson claims that "the modelers have selected" rather than the "unsupported [CLEC] forecasts of the future." Provide citations to any and all authorities relied upon by Mr. Watson to support his contention

that "the [CPRO] modelers' forcasts" are superior to and more reliable than those advanced by the "CLECs and analysts."

AT&T 135: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 3, Mr. Watson states: "To be consistent with the default prices, CPRO estimates the cost of customer acquisition at $120 per customer. This value is within the range of values that CLECs currently spend for customer acquisitions."

a. As a clarification, is the $120 cost of customer acquisition produced as an "estimate" by the CPRO model, or is it an input to the CPRO model? If the former, provide all data inputs (and their sources) and the specific formula(s) and relationships that are used by the CPRO model to develop the "estimate."

b. If the latter, provide all data and sources used to derive the input and explain with specificity how the $120 acquisition cost per customer was determined "to be consistent with the default prices."

AT&T 136: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 3, Mr. Watson states: "The default market share target of five percent is also consistent with the default prices." Please explain with specificity how the "default market share target of five percent" was determined to also be "consistent with the default prices." What is the specific relationship assumed by the CPRO model between "market share" and "prices"? What source(s) was(were) used in determining this relationship?

AT&T 137: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 3, Mr. Watson states: "The default value of three percent churn per month is also consistent with the other inputs." What is the specific relationship assumed by the CPRO model between "churn" and "the other inputs"? To which specific "other inputs" is Mr. Watson referring? What source(s) was(were) used in determining this relationship?

AT&T 138: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Provide a complete copy of the "New Paradigm Group's *CLEC Report*," referred to on page 4.

AT&T 139: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 6, Mr. Watson states that the "default value for the [DLC] concentration ratio is four to one." Provide all data and studies, and identify their specific sources, being relied upon by Mr. Watson and/or "the CPRO modelers" as the basis for this determination.

AT&T 140: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Describe with specificity all of the attributes of "an efficient CLEC" in terms of the various inputs, assumptions and parameters that were provided to the CPRO modelers.

a. What is the minimum number of access lines that a CLEC must serve in order to be considered "efficient"?

b. What is the minimum number of access lines that a CLEC must serve in any given ILEC wire center in order to be considered "efficient"?

c. What specific services must a CLEC provide in conjunction with its provision of basic local (dial tone) telephone service in order to be considered "efficient"?

d. What is the minimum size geographic footprint that a CLEC must serve in order to be considered "efficient'?

e. What is the minimum market share than a CLEC must acquire in order to be considered "efficient"?

AT&T 141: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 14, Mr. Watson states: "CPRO's default value for the operating cost per minute of domestic long distance is $0.015 per minute—apart from access, SG&A, and uncollectibles ..."

a. Does Qwest currently provide switched domestic long distance transport services to other carriers for resale at prices exclusive of access charges? If the response is anything other than an unqualified negative, provide a detailed description of all such services together with the specific pricing and other economic terms associated therewith.

b. Does Qwest Corporation or any of its Sec. 272 long distance affiliates currently purchase switched domestic long distance transport services from other carriers for resale by Qwest, at prices exclusive of access charges? If the response is anything other than an unqualified negative, provide a detailed description of all such services together with the specific pricing and other economic terms associated therewith.

AT&T 142: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 21, Mr. Watson states: **"**CPRO assumes that the modeled CLEC already operates in other LATAs. Consequently, it already has an operational OSS. The time required to modify the OSS for use in an additional LATA should not take more than a few months, since no records of existing customers need to be transferred. Furthermore, part of the required OSS modifications could, if necessary, be completed before the arrival of the management team in the new LATA.**"**

a. Is it Mr. Watson's position that to be "efficient" a CLEC must "already operate[] in other LATAs?"

b. In how many "other LATAs" must the CLEC operate in order to be considered "efficient"?

c. How many customers must the CLEC serve in each LATA in which it operates in order to be considered "efficient"?

d. Provide citation(s) to the TRO or to any other authorities upon which Mr. Watson relies for the referenced statement and for his responses to (a) through (c).

AT&T 143: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 23, Mr. Watson states: "CPRO's default values [for OSS] are reasonable, notwithstanding the fact that much higher levels of gross investment for computer and software development reported on the balance sheets of some CLECs. Examples of higher levels of investment are as follows: Choice One Communications: $56 million in 2002, $49 million in 2001; and Z-Tel, $47 million in 2002, 35 million in 2001." He then explains (at p. 22) that "These CLECs have substantial requirements for investments in computers for businesses other than the provision of CLEC services. They have invested heavily in enhanced services."

a. Please identify with specificity each and every of the "businesses other than the provision of CLEC services" that Choice One Communications and Z-Tel engage in and provide all data and sources relied upon by Mr. Watson in making the statement cited above.

b. Identify with specificity those portions of the cited Choice One Communications and Z-Tel OSS investments that are associated with "businesses other than the provision of CLEC services." Provide the specific sources relied upon in responding to this request.

AT&T 144: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Provide the total cumulative dollar investment made by Qwest Corporation in its OSS through the most recent date for which this data is available.

a. For its operations in Utah state.

b. For its entire 14-state operating area.

AT&T 145: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 24, Mr. Watson states: "The modelers found data for only a single CLEC that has not made substantial acquisitions. This data does not include substantial computer investments for other lines of business. That company, Pac West Telecom, had OSS investments of $19.6 million for computers and software after their first complete year of operation (2000), although Pac West serves only small and medium business customers, as well as ISPs. This value is consistent with CPRO's default value of $17 million for a mass market serving CLEC." Footnote omitted.

a. Does Pac West Telecom currently provide *any* "mass market" services as the term is specifically defined in the TRO as constituting residential customers and small business customers having three or fewer access lines? Provide the basis for this response.

b. What was Pac West's cumulative "OSS investments for computers and software" through the most recent period for which data is available?

c. Please explain how Pac West's OSS investment of $19.6 million for the small and medium business customers and ISPs that constitute Pac West's customer base is "consistent with CPRO's default value of $17 million for a mass market serving CLEC."

AT&T 146: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 27, Mr. Watson states: "A CLEC that wants to grow rapidly must pay more per line than one that is satisfied with a more moderate rate of growth."

a. Provide the specific quantification of this relationship that is incorporated into the CPRO model. Provide sources for this modeled relationship.

b. Has Mr. Watson ever personally participated in the marketing of CLEC services or in the decision as to the optimally efficient level of customer acquisition costs and rate of growth? If the response is anything other than an unqualified negative, provide a detailed description of Mr.

Watson's experience both with CLEC marketing generally and with the specific acquisition expenditure vs. growth rate tradeoff.

AT&T 147: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 27, Mr. Watson states: "The moderate growth target in CPRO (5 percent market penetration after 5 years, *see* Section 5.3) does not require exorbitant expenditures for customer acquisition marketing."

a. Define "exorbitant expenditures" as the term is used here.

b. Upon what basis does Mr. Watson determine that the specific acquisition cost of $120 per customer and the "growth target in CPRO (5 percent market penetration after 5 years)" is "efficient" as the term is utilized in the TRO?

AT&T 148: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Explain the basis for Mr. Watson's contention, at page 27, that "A UNE-P based provider's customer acquisition costs may be higher than a UNE-L-based provider." Specifically, is Mr. Watson assuming that a CLEC relying upon UNE-P will confront a greater level of competition from other CLECs than would a CLEC that utilizes UNE-L? If the answer is in the affirmative, provide a narrative explanation for this assumption. If the answer is in the negative, then identify with specificity those aspects of UNE-P operation that would cause customer acquisition costs to be greater, all else equal, than for UNE-L.

AT&T 149: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 27, Mr. Watson states: "Customer acquisition marketing costs cannot be explained by the local market alone. The AT&T and MCI strategy, once a Bell Operating Company obtained 271 relief, has been rapid market expansion, in part in order to ameliorate losses of long-distance revenues. This strategy is obviously not appropriate for a start-up CLEC." Footnote omitted.

a. Confirm that the CPRO is modeling "a start-up CLEC."

b. Does the $120 customer acquisition cost assume that the "start-up CLEC" is not also engaged in the marketing of long distance services?

c. How many other LATAs does CPRO assume that the "start-up CLEC" currently operates in?

AT&T 150: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 32, Mr. Watson states that "Since ILECs and CLECs are in the same line of business, the ILEC ratio of G&A costs to the sum of network and customer-care costs should be indicative of what an efficient CLEC can achieve."

a. Is it Mr. Watson's belief that G&A costs are 100% variable and that they vary directly with the overall scale of a LEC's operations? If the response is anything other than an unqualified affirmative, please reconcile the response with the quoted statement.

b. Is it Mr. Watson's belief that there are zero economies of scale in a LEC's operations insofar as G&A expenses are concerned? If the response is anything other than an unqualified affirmative, please reconcile the response with the quoted statement.

AT&T 151: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With respect to Table 11, at page 40:

a. Provide the "Qwest internal data" upon which CPRO relies for the factor of 0.50 that is applied to total Dial Equipment Minutes (DEMs) to determine "originating minutes of use (MOUs)."

b. Provide the actual Qwest originating and terminating access minutes per line separately for intrastate and interstate access MOUs, corresponding to the state-specific "Access and Toll DEMs" shown in the table. For purposes of this response, for intraLATA toll DEMs provided by Qwest, use the access equivalent originating and terminating DEMs.

AT&T 152: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 41, Mr. Watson states: "CPRO assumes that the flat-rate caller uses 400 toll MOUs as this is the break-even point – the point where the consumer would find it more economical to choose the flat-rate plan." Please explain why the *average* toll MOUs used in flat-rate plans should be the same as the "break-even point" between flat-rate and measured-use toll plans. Explain why it would not be reasonable to assume that the *average* would be greater than the break-even point.

AT&T 153: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At page 41, Mr. Watson states: "Overall Penetration at the End of the Fifth Year: Default Value: 0.05" How many CLECs does Mr. Watson anticipate will be able to achieve this level of market penetration at the end of the fifth year? What does Mr.

Watson expect for the aggregate CLEC market penetration rate (for all CLECs combined) at the end of the fifth year?

AT&T 154: Re: Direct Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

At pages 42-44, Mr. Watson discusses the "Monthly Contributions from Other Services and Features" to which he assigns a default value of $3.00. For each of the specific services and revenue sources identified on Table 13 (page 43), provide the corresponding cost of providing each of these services, including the incremental cost of marketing specifically associated with each service.

AT&T 155: Re: Testimony of Bryon S. Watson

The testimony of Bryon S. Watson states "For the geographic dimension, I focus on Metropolitan Statistical Areas ("MSAs") and select inputs accordingly." [Testimony of Bryon S. Watson, p. 5] Please explain how and why the choice of MSA for the unit of analysis was made. Please provide any additional analyses conducted at a geographic level other than MSA.

AT&T 156: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With reference to the criteria listed on page 4 of the CPRO Model Inputs (Exhibit BSW-3C), please explain how the criteria of a CLEC serving between 200,000 and 1,300,000 access lines were determined.

AT&T 157: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With reference to the default value for per-line switching costs on page 12 of the CPRO Model Inputs (Exhibit BSW-3C), please provide any third-party or independent justification besides the "Qwest internal cost studies" referenced in determining the per-line cost of switching ports.

AT&T 158: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With reference to the default value for per-line switching costs on page 12 of the CPRO Model Inputs (Exhibit BSW-3C), please provide any third-party or independent justification besides the "information received from Qwest" which supports the default DLC per-line cost.

AT&T 159: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With reference to the default value for collocation space preparation costs on page 13 of the CPRO Model Inputs (Exhibit BSW-3C), please provide any relevant cost studies or other justification for the following statement regarding collocation space preparation

costs: "CPRO's current default value of $5,000 per CO is therefore a conservative estimate based on consideration of these activities (in fact, it assumes greater cost than would normally be incurred)."

AT&T 160: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With reference to Table 2 on page 10 of the CPRO Model Inputs (Exhibit BSW-3C), please explain why the average fraction of support PPE to gross investment value of 0.17 was not weighted by the scale of the particular CLEC (i.e., by access lines or revenue)?

AT&T 161: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With reference to the default value for prices on page 37 of the CPRO Model Inputs (Exhibit BSW-3C), please explain the rationale or justification for the statement "The MCI prices are a reasonable approximation of what a CLEC can achieve today."

AT&T 162: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With reference to the default value for prices on page 37 of the CPRO Model Inputs (Exhibit BSW-3C), please describe the specific analysis which is referred to in the statement "The modelers set CPRO's efficient CLEC's prices using MCI's plans. From CPRO's analysis of public information and Qwest data, this assumption is valid." Also explain why values for other CLECs, specifically those CLECs used to calculate average values which formed the basis for other CPRO inputs, were not used in this calculation.

AT&T 163: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

The CPRO Model Inputs (Exhibit BSW-3C) exhibit states on page 37 "The flat-rate unlimited long-distance minute plans cost consumers roughly $60 per line for business and $50 per line for residential subscribers. It is reasonable to ask whether CLECs actually achieve this level of mass market subscriber revenues. Z-Tel primarily serves the residential and small business market. Z-Tel reports revenue per line at $68. Z-Tel's beginning and end year number of lines were averaged and applied to total year revenues for its Z-Home and Z-Business services. Separately reported long-distance and wholesale revenues were excluded from the calculation." Explain why Z-Tel rather than any other CLEC or group of CLECs was chosen for a per-line revenue benchmark. Also please report any other per-line revenue estimates for other CLECs which were used in benchmarking the price default inputs used in the CPRO.

AT&T 164: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

The CPRO Model Inputs (Exhibit BSW-3C) exhibit states on page 37 "Many publicly-owned CLECs focus on the small and medium-sized business market. Calculation of monthly average revenue per switched line for these CLECs is over $60 per line per month." Explain why values for other CLECs, specifically those CLECs used to

calculate average values which formed the basis for other CPRO inputs, were not used in this calculation.

AT&T 165: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

With reference to the default value for relative penetration rates of flat-rate vs. measured plans on page 41 of the CPRO Model Inputs (Exhibit BSW-3C), please explain the justification for the assumption of 60 percent flat-rate, 40 percent measured-rate plan penetration for residential and business. Also provide any averages, cost studies, or other information which supports this default value.

AT&T 166: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Explain the discrepancy between the figures reported in The CPRO Model Inputs (Exhibit BSW-3C) Table 13 on page 43 and the statement "Taking all these opportunities into account, the default value of $3.00 per month is a reasonable estimate of the contributions that an efficient CLEC could derive from other services and features."

AT&T 167: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Given the statement on page 45 of the CPRO Model Inputs (Exhibit BSW-3C) "In Table 15, CPRO compares the uncollectible revenue for all of the CLECs that have determined to be within reasonable comparison to CPRO's model CLEC," please explain why data from these same CLECs was not used to determine the default values for the prices, penetration, and revenues in the CPRO model.

AT&T 168: Re: Testimony of Bryon S. Watson

With reference to the statement "After the five-year active period, the model estimates a steady-state level of operations and applies a trend factor for revenues and costs" on page 9 of the testimony of Bryon S. Watson, please explain how this trend was calculated and where it is applied to prices in the CPRO model.

AT&T 169: Re: Testimony of Bryon S. Watson, Exhibit BSW-1

With regard to the statement on page 4 of the General Model Description (Exhibit BSW-1) "Since Cash flow is calculated from the perspective of stockholders, the appropriate discount rate is the cost of equity" please explain why cash flow is calculated from the perspective of shareholders and why this implies that the appropriate discount rate is the cost of equity. Please provide the relevant cites to any financial texts which support this conclusion.

AT&T 170: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

Given that the averages computed in Table 10 on page 34 of the CPRO Model Inputs (Exhibit BSW-3C) are much higher than 0.07, please explain how the default value of 0.07 for cash and equivalents as a fraction of annual expenditures was arrived at.

AT&T 171: Re: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

In Confidential Exhibit BSW-3C Mr. Copeland explicitly bases many of his model input values on Alcatel Litespan "technical specifications."

If Qwest Communications uses Alcatel Litespan digital loop carrier equipment in Washington, or, more generally, in any state in its operating region, respond to the following:

a. For Litespan DLC systems configured for integrated GR-303 operation, what is the nominal concentration ratio assumed in Qwest's design of such systems?
b. If the concentration ratio assumed in the system design varies, provide a breakdown of the ratios used (e.g., x% use 4:1, y% use 3:1).
c. Provide copies of all Alcatel technical documentation, including current Litespan Standard Practices, that list, describe, or explain "typical," "acceptable," "nominal," or "recommended" concentration ratios for Litespan equipment configured for integrated GR-303 operation.

AT&T 172: Testimony of Bryon S. Watson, Exhibit BSW-3C, CPRO Model Inputs

If Qwest Communications does not use Alcatel Litespan digital loop carrier equipment in Washington, or, more generally, in any state in its operating region, respond to the following:

a. List all DLC system types, by manufacturer, that are deployed and configured for integrated GR-303 operation.
b. For each DLC system type configured for integrated GR-303 operation, what is the nominal concentration ratio assumed in Qwest's design of such systems? If the value varies by equipment vendor and type, list the nominal concentration ratio for each DLC equipment type (vendor and model).
c. If the concentration ratio assumed in the system design varies, provide a breakdown of the ratios used (e.g., x% use 4:1, y% use 3:1) by DLC equipment type (vendor and model).
d. Provide copies of all vendor technical documentation that list, describe, or explain "typical," "acceptable," "nominal," or "recommended" concentration ratios for each DLC equipment type configured for integrated GR-303 operation.

AT&T 173: Re: Direct Testimony of William Fitzsimmons

Describe all independent steps that Mr. Fitzsimmons took to validate the appropriateness of the methods and inputs used in Mr. Watson's business case model, including but not limited to:

(a) CLEC prices and revenues
    i. for basic local telephone service
    ii. for other services and features (see Watson, Exh. BSW-3C, pp. 42-43)
(b) CLEC market share
(c) Rate of customer churn
(d) Default economic lives for equipment
(e) Characteristics necessary for a CLEC to be considered "efficient"
    i. Minimum number of access lines served (total)
    ii. Minimum number of access lines served (per wire center)
    iii. Specific services CLEC must provide in conjunction with basic (dial tone) service.
    iv. Minimum size of geographic footprint
    v. Minimum market share
(f) Assumption of carrier-owned facilities for provision of long distance services
(g) Scope of the CLEC's geographic operations outside of Utah state (i.e., assumption (Watson, Exh. BSW-3C, p. 21) that "CLEC already operates in other LATAs).
(h) Default values for OSS
(i) Relationship (Watson, Exh. BSW-3C, p. 27) between cost and rate of line growth
(j) DLC concentration ratio (see Watson, Exh. BSW-3C, p.6)
(k) The assumed ratio of G&A costs to the sum of network and customer-care costs for the CLEC (see Watson, Exh. BSW-3C, p. 32)

AT&T 174: Re: Direct Testimony of William Fitzsimmons

Provide copies of all source materials referenced at footnote nos. 7, 15, 53, 63, 99, 100, 104, 105, 112, 117, and 121.

AT&T 175: Re: Direct Testimony of William Fitzsimmons

Mr. Fitzsimmons references testimony by Mr. Reynolds concerning wireless substitution.

(a) Does Mr. Fitzsimmons have any basis to believe that the "27 percent of respondents" in Utah who Mr. Reynolds says substitute wireless service for residential wireline service are all substituting for their primary line and that these "respondents" are a representative sample of Qwest's customers.
(b) Please provide the Utah and Iowa studies discussed by Mr. Fitzsimmons and Mr. Reynolds; all associated reports, summaries, appendixes, attachments, and documentation; and the contract between Qwest and the entity or entities that conducted the studies.

(c) Please provide any other studies commissioned or conducted by Qwest regarding wireless substitution and (i) all associated reports, summaries, and documentation and (ii) the contract between Qwest and the entity or entities who conducted the studies.

AT&T 176: Re: Direct Testimony of William Fitzsimmons

Does Mr. Shooshan know what percentage of the customers surveyed in Utah responded to Qwest's survey regarding wireless substitution?

AT&T 177: Re: Direct Testimony of William Fitzsimmons

On page 78, Mr. Fitzsimmons calls it "curious" that the FCC distinguishes facilities-based competition from cable telephony, where the provider owns its own loop facilities as well as its own switching, from the situation where the CLEC provides its own switch, but continues to be impaired with respect to local loops, which it buys from the ILEC as UNEs. Does Mr. Fitzsimmons see no difference in the entry conditions for cable CLECs who enter telephony with existing "last mile" facilities (from their cable television businesses) and CLECs who are starting "from scratch" with respect to loop facilities?

AT&T 178: Re: Testimony of William Fitzsimmons

On page 20, Mr. Fitzsimmons states: "The courts have also emphasized the importance of facilities-based competition and of an approach to unbundling that advances the critical goals of promoting investment in facilities." Please provide legal citations (including page number and corresponding language) from any cited case in which any U.S. or state court has made such a proclamation and/or expressed such a view.

AT&T 179: Re: Testimony of William Fitzsimmons

On page 25, Mr. Fitzsimmons indicates that the District of Columbia Circuit of the U.S. Court of Appeals, in the case entitled United States Telecom Association v. Federal Communications Commission, 290 F.3d 415 (D.C. Cir., 2002) ("USTA") stated "that a cost disparity can justify a finding of impairment only if the cost characteristics of a UNE 'render it …unsuitable for competitive supply;' i.e. where there are 'natural monopoly' characteristics that would make deployment of such facilities by competitors 'wasteful'…." Please cite the exact language in USTA that requires there be characteristics of a natural monopoly "that would make deployment of such facilities by competitors wasteful before cost disparity could justify a finding of impairment.

AT&T 180: Re: Testimony of William Fitzsimmons

Please provide any legal citations (including page number and relevant language) from any cited case in which any U.S. or state court has made or commented on the proclamation that "mandatory unbundling when there is no impairment undermines lasting competition." (as stated in Mr. Fitzsimmons' testimony, p.26.)

AT&T 181: Re: Testimony of William Fitzsimmons

Please identify any Federal Communications Commission Orders/Rules and/or U.S. or state court cases (including blue book citation, page number and relevant language) that expressly articulate the "guiding principle" discussed by Mr. Fitzsimmons on p.14.

AT&T 182: Re: Direct Testimony of Joseph Weber

On page 7, Mr. Weber, when describing an Enhanced Extended Loop (EEL), states that the customer's loop is multiplexed up to a DS1 for transport to the location where the CLEC has collocated space. Does Qwest offer EEL transport at capacities that are greater than DS1?

AT&T 183: Re: Direct Testimony of Joseph Weber

Please provide, by central office location, the number of access lines that are currently on EEL arrangements in the state of Utah.

AT&T 184: Re: Direct Testimony of Joseph Weber

Please provide, by central office location, the number of remote switching units that CLECs have installed in Qwest collocated space.

AT&T 185: Re: Direct Testimony of Joseph Weber

On page 14 of Mr. Weber's testimony he states; "As CLECs grow, they may also find it economical to deploy more switches, and the three arrangements described above will allow them an orderly and economic growth path." Has Qwest performed any studies on the costs to a CLEC associated with the deployment of its own switches and the associated collocation and backhaul costs to deliver the unbundled loops to the CLECs remotely located switches? If so, please provide the results from these studies.

AT&T 186: Re: Direct Testimony of Joseph Weber

Referring to page 3 of Mr. Weber's testimony he states "Other manufacturers, such as NEC, Ericsson and ALcatel, may provide opportunities for entry level CLECs." Please (a) define "entry level CLEC" and (b) describe in detail what Mr. Weber means by "opportunities" and the equipment from each of these manufacturers that will provide such opportunities.

AT&T 187: Re: Direct Testimony of Joseph Weber

Referring to page 4 of Mr. Weber's testimony he states "The cost of a particular switch generally has a fixed "getting started" cost, plus other costs that depend on the number of users, the traffic levels and the particular features that are required." WIth respect to this statement, please provide the following:

a. Define specifically the switch components and all elements included in "getting started" costs;
b. Define specifically the "other costs that depend on the number of users;"
c. Define specifically the other costs that depend on "the traffic levels"; and

d. Define specifically the other costs that depend on the "particular features."

AT&T 188: Re: Direct Testimony of Joseph Weber

Referring to page 4 of Mr. Weber's testimony where he states "[t]his means that installation times are shorter." Please define all installation requirements for switches generally. In regard to the particular switches, please define:

a. all installation requirements for DMS-10 switches and who Mr. Weber anticipates will perform the requirements identified; and
b. all installation requirements for DMS-100 switches and who (e.g., switch manufacture or purchaser) Mr. Weber anticipates will perform the requirements identified.

AT&T 189: Re: Direct Testimony of Joseph Weber

Referring to Mr. Weber's testimony on page 5 where he claims "[t]he average installation interval (from ordering to service) for large switch projects undertaken by the ILECs is approximately four months."

a. Please provide all the data and documents upon which Mr. Weber relied in drawing his conclusion.
b. Define "large switch projects."

AT&T 190: Re: Direct Testimony of Joseph Weber

In Qwest's 14-state region identify all the switches that Qwest has installed, by state, since 1999 to the present. For each switch, identify:

a. The switch vendor;
b. The switch type;
c. The installation location;
d. Produce the switch order form or purchase order; and
e. The date upon which each switch first began service, with all supporting documentation.

AT&T 191: Re: Direct Testimony of Joseph Weber

Referring to page 5 of Mr. Weber's testimony where he states: "[t]he most effective way for a packet switch to support voice service is . . ." Please provide Mr. Weber's definition of "packet switch" and distinguish such switch from the DMS-100 switches previous referenced.

AT&T 192: Re: Direct Testimony of Joseph Weber

Referring to page 9 of Mr. Weber's testimony where he states: the EEL arrangement "is most efficient when the demand – the number of lines served by the CLEC – at the remote wire center is small." In regard to this statement, please:

a. State the number of lines that constitutes "small;"

b. State all the reasons EELs for lines over the number identified in response to subpart (a) directly above are inefficient; and
c. Define "remote wire center."

AT&T 193: Re: Direct Testimony of Joseph Weber

Referring to page 19 of Mr. Weber's testimony where he states "Certainly the Lucent and Nortel switches, and probably the DSS switches, are large fully functional voice switching systems, designed to serve large numbers of customers." Please provide all the data upon which Mr. Weber relied in drawing this conclusion.

AT&T 194: Re: Direct Testimony of Joseph Weber

Referring to page 19 of Mr. Weber's testimony where he states "These include a number of packet switches and soft switches which were designed to support data traffic, but can certainly be used to serve voice traffic." Please provide all the data upon which Mr. Weber relied in drawing this conclusion.

AT&T 195: Re: Direct Testimony of Joseph Weber

With respect to the packet and soft switches discussed in reference to question 9 above, please state if Mr. Weber believes the whether packet switches and soft switches require any reconfiguration for use in voice service, and if he answers in the affirmative, please identify the reconfigurations required.

AT&T 196: Re: Direct Testimony of Laura L. Scholl

At page 10 of her prefiled testimony, Ms. Scholl, referring to Exhibit LLS-2C, states: "Confidential Exhibit LLS-2C is a map of Utah that depicts the manner in which a subset of the CLECs in Utah report to be serving various geographic areas of the state via CLEC-owned switches, based on data shown in the LERG."

a. Since the LERG is a publicly-available document yet this exhibit is designated as "Confidential," please identify any and all information portrayed on the LLS-2C map that was derived from sources other than the LERG, and identify all such sources. If no sources other than data obtained from the LERG were used in preparing Exhibit LLS-2C, please explain the basis upon which Exhibit LLS-2C is claimed to be proprietary.

b. Is it Ms. Scholl contention that each and all of the lines shown on the Exhibit LLS-2C map represent physical transport links owned or leased by the respective CLECs interconnecting the various remote rate centers with the CLECs' switches? If the response is in the affirmative, provide a detailed description of each such transport facility, its physical capacity (expressed in terms of DS1 equivalents), its physical routing, and its ownership. Indicate the source(s) used in obtaining this information.

AT&T 197: Re: Direct Testimony of Laura L. Scholl

At page 11, Ms. Scholl states, "On the map [referring to Exhibit LLS-2C], the larger circles represent the cities in which the CLEC's switches are physically located, while the smaller circles represent the various rate centers served by those switches." Does Ms. Scholl interpret the LERG data as indicating that one or more CLECs has a *physical* presence (either via physical or virtual collocation) at each of the rate centers shown on Exhibit LLS-2C? If the answer is in the affirmative, provide the basis for that interpretation. If the answer is in the negative, provide a revision to Exhibit LLS-2C reflecting only those rate centers in which the various CLECs maintain a physical (collocation) presence.

AT&T 198: Re: Direct Testimony of Laura L. Scholl

For each rate center for each CLEC identified on Exhibit LLS-2C, indicate which of the NXX code(s) assigned to the CLECs as obtained from the LERG are "virtual" NXX codes.

AT&T 199: Re: Direct Testimony of Laura L. Scholl

For each rate center for each CLEC identified on Exhibit LLS-2C, provide the total number of mass market customers receiving service in the rate center from the CLEC.

AT&T 200: Re: Direct Testimony of Laura L. Scholl

At pages 11, Ms. Scholl states: "Third, the map shows that CLECs have found it feasible to transport traffic significant distances, and even across state boundaries, to serve targeted markets from voice switches that serve broad geographic areas." Provide the source data upon which Ms. Scholl claims the map "shows that CLECs have found it feasible to transport traffic significant distances, and even across state boundaries ..."

AT&T 201: Re: Direct Testimony of Laura L. Scholl

For each rate center for each CLEC identified on Exhibit LLS-2C, provide separately (a) the total annual volume of §251(g) ISP-bound "information access" traffic, and (b) the total annual volume of §251(b)(5) reciprocal compensation traffic being handed off by Qwest to the CLEC, and provide the total number of DS1 equivalent interconnection trunks between Qwest and the CLEC that are being used to carry the traffic identified in (a) and (b).

AT&T 202: Re: Direct Testimony of Laura L. Scholl

At page 17, Ms. Scholl states "Qwest has obtained a confidential report from Intrado, Qwest's E911 service administrator, of all residential and business E911 records for all service providers currently serving customers in Qwest's territory." At page 17, Ms. Scholl states "Qwest has obtained a confidential report from Intrado, the third-party E911 database administrator for Utah of residential and business CLEC customer records in the database as of July 2003."

a. Provide the entire contract entered into between Intrado and Qwest setting forth the terms of the Intrado engagement, including in particular but not

limited to any confidentiality, nondiscloure, and proprietary information agreements or covenants relating to the parties' respective rights and obligations with respect to the customer data provided by Qwest to Intrado and maintained by Intrado.

b. Provide the entire contract entered into between Intrado and each CLEC for which Intrado maintains E911 database records, setting forth the terms and conditions of Intrado's access to and use/disclosure of CLEC customer proprietary data, including in particular but not limited to any confidentiality, nondiscloure, and proprietary information agreements or covenants relating to the parties' respective rights and obligations with respect to the customer data provided by the respective CLECs to Intrado and maintained by Intrado.

c. Provide the "confidential report from Intrado ... of all residential and business E911 records for all service providers currently serving customers in Qwest's territory" and, if different, the "confidential report ... of residential and business CLEC customer records in the database as of July 2003."

d. Provide all correspondence, including but not limited to e-mails and letters, between Qwest and Intrado regarding the "confidential report(s)" referenced at pages 18 and 21. Explain how the request for such a report was communicated by Qwest to Intrado. Identify all individual(s) in the employ of Intrado who were involved in receiving and/or fulfilling Qwest's request. If the request was conveyed orally, identify the individuals at Qwest who made the request and the date(s) on which such communications occurred, and identify the individual(s) at Intrado with whom Qwest communicated with respect to this request.

e. Did Intrado notify any CLECs whose proprietary customer data was to be included in the "confidential report" that it had received a request from Qwest for this information and that Intrado intended to comply with Qwest's request? If the answer is in the affirmative, provide copies of all such notification(s), the date(s) on which such notification(s) was(were) made, and the manner in which they were transmitted (e.g., via e-mail, letter, telephonically, in person, or other). Indicate the legal authority upon which Intrado relies affording it the right to convey CLEC proprietary customer data to Qwest.

AT&T 203: Re: Direct Testimony of Laura L. Scholl

a. For each "community" identified in Scholl Exhibit LLS-3C, indicate the number of "RES CLEC E911 RECORDS" for which Qwest is providing the UNE-L.

b. Indicate, separately for each "community" identified in Scholl Exhibit LLS-3C, the number of CLEC customers who are being served by CLEC-owned loop or access facilities (e.g., cable systems).

AT&T 204: Re: Testimony of Laura L. Scholl

Qwest defined mass market unbundled loops as "from one to three unbundled loops terminating at a customer's location." (Scholl Direct, p. v.) Please indicate the method Qwest employed to distinguish CLEC customers with three or less unbundled loops at a location from CLEC customers with more than three unbundled loops at a location.

AT&T 205: Re: Testimony of Laura L. Scholl

Does Qwest offer its small and medium business customers an integrated access service option? For the purposes of this question the integrated access service includes multiple voice lines and data capability provided over a DS1-capable loop and Qwest-provided customer premises equipment (e.g. similar to the Adtran Total Acesss 750 Integrated Access Device). If the answer is yes, please provide the Qwest marketing literature that supports the service.

AT&T 206: Re: Testimony of Laura L. Scholl

Do the quantities shown in the column titled "Gross Quantity of Ported Numbers" in Ms. Scholl Confidential Exhibit LLS-4HC include all ported telephone numbers for both mass market and enterprise customers? If the "Gross Quantity of Ported Numbers" shown in Ms. Scholl's Confidential Exhibit LLS-4HC does include numbers for both mass market and enterprise customers, please separately report for each wire center in Confidential Exhibit LLS-4HC the mass market and enterprise quantities of numbers ported.

AT&T 207: Re: Testimony of Laura L. Scholl

For the quantities of "Mass Market UNE loops" identified in each row of Highly Confidential Exhibit LLS-6HC, please report the number of those loops that are 2 wire analog.

AT&T 208: Re: Testimony of Laura L. Scholl

For the quantities of "Mass Market UNE-L Provided to CLECs" in each row of Confidential Exhibit LLS-6HC, please report the number of those loops that are 2 wire analog.

AT&T 209: Re: Testimony of Laura L. Scholl

Please provide, by wire center, the total number of EELs in service in Utah that include a DS0 unbundled loop as part of the EEL. Please also provide the monthly total number of EELs installed in Utah that include a DS0 unbundled loop as part of the EEL for the last 12 months of available data.

AT&T 210: Re: Testimony of Laura L. Scholl

For each of the rows in Highly Confidential Exhibit LLS-6HC, please provide the number of "Mass Market UNE Loops" that were installed by Qwest for each of the last twelve months of available data.

AT&T 211: Re: Testimony of Laura L. Scholl

For each of the rows in Highly Confidential Exhibit LLS-6HC, please provide the number of unbundled 2 wire analog loops that were installed by Qwest for each of the last twelve months of available data.

AT&T 212: Re: Testimony of Laura L. Scholl

Please explain how Qwest determined that the two CLECs identified in the note on line 122 of Highly Confidential Exhibit LLS-6HC were self-provisioning service to mass market customers in the wire centers identified in Highly Confidential Exhibit LLS-6HC.

AT&T 213: Re: Testimony of Laura L. Scholl

Referring to Exhibit LLS-2C, please provide an example of the specific LERG data extracted from the reports to Telcordia and describe how, using the extracted information, Qwest derived the "lines radiating from the CLEC switch locations to the various rate centers."

AT&T 214: Re: Testimony of Laura L. Scholl

Referring to Exhibit LLS-2C and Ms. Scholl's Direct Testimony at pages 11, please define whose "rate centers" the "smaller circles represent" (e.g., CLEC-defined rate centers or Qwest's rate centers).

AT&T 215: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 17, stating "Qwest tracks the various wholesale services being provided to facilities-based CLECs, such as unbundled loops, number porting, and collocation." In regard to this quote, please answer the following:

a. Describe how Qwest defines "facilities-based" CLEC;
b. Identify all Operational Support Systems (OSS) or other systems employed by Qwest to "track" wholesale services provided to CLECs;
c. Identify all the information actually collected by Qwest (e.g., LSR information, billing information, etc.) to "track" the CLECs;
d. State whether such tracking is done in the ordinary course of business or whether Qwest is tracking CLECs only for purposes of acquiring information for this docket.

AT&T 216: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 17, please produce the "confidential report from Intrado."

AT&T 217: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 19, stating "[T]he LERG reflects the 'rate center' served by each switch, as opposed to wire center or exchange area, which is how Qwest typically tracks network information for administrative purposes." In regard to this quote, please answer the following:

a. Describe how Qwest defines "rate center;"
b. Describe how Qwest defines "wire center;"
c. Describe how Qwest defines "exchange area;"
d. Describe in detail how Qwest "tracks" network information for administrative purposes.

AT&T 218: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 19, please produce all the data upon which Ms. Scholl relied to conclude "the evidence available to Qwest shows that there are at least three unaffiliated facilities-based CLECs serving mass market customers in the Provo-Orem, Salt Lake City, and Ogden-Clearfield MSAs via CLEC-owned switches."

AT&T 219: Re: Testimony of Laura L. Scholl

Referring to LLS-4HC, the column entitled "Mass Market UNE-L Provided to CLEC," distinguish the loops serving business customers from the loops serving residential customers for each row and describe how Qwest distinguishes loops serving residential customers from those serving small business customers.

AT&T 220: Re: Testimony of Laura L. Scholl

Referring to LLS-4HC, please produce a similar table for UNE-P providers.

AT&T 221: Re: Testimony of Laura L. Scholl

Referring to LLS-5C, please provide proof, for each carrier listed, that the total number of NPA-NXX shown, in fact represents 10,000 numbers and not thousand blocks.

AT&T 222: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 26 stating "CLECs using fiber loops often connect those loops directly to CLEC switches, which may not be collocated in Qwest central office space." With respect to this statement, please produce all evidence Qwest relies upon to imply that CLECs are serving "mass market" customers through fiber loops.

AT&T 223: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 26 stating, "in smaller wire centers, the CLEC can connect the UNE loops directly to multiplexers and interoffice UNEs to reach its serving switch." Please identify all "smaller wire centers" in Utah wherein

CLECs have directly connected UNE loops to multiplexers and interoffice UNEs to reach their switches.

a. For each wire center identified, provide all the evidence upon which Qwest relies to show such UNE loop connection serves the "mass market."
b. Define "interoffice UNEs" as employed in the quote, above.

AT&T 224: Re: Testimony of Laura L. Scholl

Referring to LLS-6HC, the column entitled "Mass Market UNE-Loops" distinguish the loops serving business customers from the loops serving residential customers for each row and describe how Qwest distinguishes loops serving residential customers from those serving small business customers.

AT&T 225: Re: Testimony of Laura L. Scholl

Please produce the underlying data employed to create LLS-6HC.

AT&T 226: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 28 stating "cable telephony providers serving these MSAs are certified as CLECs … ." Please identify, by name, all cable telephony providers to which Ms. Scholl refers.

AT&T 227: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 27 stating "[i]t is important to note that this analysis understates the actual number DS0-level loops being used by CLECs to serve mass market customers, since Qwest has no means of tracking the quantities of CLEC-self provided loops." Apart from cable telephony providers, please identify all CLECs, by name, Qwest has reason to believe are self-provisioning loops to: (a) the residential mass market and (b) the business market.

a. Produce all documentation or data Qwest relies upon to form its belief for each CLEC identified.

AT&T 228: Re: Testimony of Laura L. Scholl

Referring to Ms. Scholl's Direct Testimony at page 28 stating "[w]hile cable telephony is technically an 'intermodal' form of competition, these providers are CLECs in every sense and should be included in a count of qualifying CLECs in this proceeding." Please describe in detail how Qwest purports to include cable providers in its trigger analysis (e.g., is Qwest considering the cable provider as an unaffiliated CLEC serving the mass market with its own switch)?

a. Identify all cable providers, by name, which Qwest has included in its trigger analysis by MSA.

b. Produce all data upon which Qwest relies to conclude that the cable providers identified in reference to subpart a, above, offer service using switches they own.

AT&T 229: Re: Testimony of Laura L. Scholl

For each switching trigger candidate identified by Qwest in Utah, please provide the most recent version of the Qwest Performance Results (aka the PID results). If a trigger candidate has multiple Qwest Performance Results reports in a month, please provide all copies of the Qwest Performance Results for the candidate for the most recent month.

AT&T 230: Re: Testimony of Laura L. Scholl

Please provide for the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of:

a. 2-Wire UNE loops;
b. 4-Wire UNE loops;
c. DS1 UNE loops;
d. DS3 UNE loops;
e. DS0 EELs;
f. DS1 EELs;
g. DS3 EELs;
h. T-1 Special Access lines; and
i. DS3/T-3 Special Access lines

provisioned to the CLECs identified by Qwest as a switching trigger candidate in Utah.

AT&T 231: Re: Direct Testimony of William R. Easton

Please provide the total number of access lines in service for all of the end offices identified in Exhibits WRE-1C, WRE-2C, and WRE-3C.

AT&T 232: Re: Direct Testimony of William R. Easton

For each central office in the state of Utah, please identify those offices that are staffed by frame technicians on a full time basis and those that are typically unstaffed. By "full time", AT&T means that the central office has frame technicians that report to this central office on a daily basis. Additionally, if any of these offices are staffed on a part-time basis by frame technicians please specify the nature of this part-time staffing (i.e. one tour per week).

Submitted February 3, 2004.

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