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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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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 )  
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AT&T Communications of the Mountain States, Inc. and TCG Utah (collectively  
“AT&T”) hereby submit this Third 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 (3/2).

**AT&T 233 Re: Pappas/White Direct Testimony**

Qwest stated, “several CLECs argued that a hundred-line maximum per central office per day would not be sufficient for them to convert their embedded base of UNE-P customers within the timeframes set forth within the *TRO*.” (Pappas/White Direct Testimony, p. 46, ls. 5-8.) Please identify in the Batch Hot Cut Forum transcript or the CLEC comments where the CLECs made this argument.

**AT&T 234 Re: Pappas/White Direct Testimony**

Qwest stated, “Qwest explained at the forum that moving pre-wiring and testing to days 2 and 3 of the proposed process instead of Due Date, as the CLECs had requested, would increase the costs associated with the COT by approximately \$4.00.” (Pappas/White Direct Testimony, p. 55, ls. 14-17.) Please identify in the Batch Hot Cut Forum transcript or in Qwest’s comments where Qwest identified a \$4.00 cost increase as a result of moving pre-wiring and testing to days 2 and 3 of the proposed process instead of the due date.

**AT&T 235 Re: Pappas/White Direct Testimony**

Please identify in the Batch Hot Cut Forum transcript or in Qwest’s comments where Qwest identifies that, in some situations, Qwest will disconnect a customer’s line while the customer is engaged in an active conversation. (Pappas/White Direct Testimony, p. 58, ls. 18-20, p. 59, ls. 1-5.)

**AT&T 236 Re: Pappas/White Direct Testimony**

Qwest states, “At the BHC Forum, the parties agreed that Qwest would create a secure, CLEC-specific, mechanically updated, web-based reporting tool, which Qwest calls the Batch Status Tool (“BST”).” (Pappas/White Direct Testimony, p. 64, ls. 6-8.) Please identify in the transcript where the parties agreed that Qwest would create a secure, CLEC-specific, mechanically updated, web-based reporting tool.

**AT&T 237 Re: Pappas/White Direct Testimony**

Qwest states, “Qwest intends to design the BST as a modification of the existing Customer Electronic Maintenance and Repair (“CEMR”) system.” (Pappas/White Direct Testimony, p. 67, ls. 6-8.) Please identify in the transcript where Qwest indicated that it would design the BST as a modification of the existing CEMR system.

**AT&T 238 Re: Pappas/White Direct Testimony**

Qwest states that a no dial tone situation on the due date occurs “about 20% of the time.” (Pappas/White Direct Testimony, p. 70, l. 7.) Please provide the basis for the assertion that there is a no dial tone situation about 20% of the time. Please also provide any work papers that support that assertion.

**AT&T 239 Re: Barrick Direct Testimony**

Please provide the section or sections of the contract or agreement with Hitachi Consulting that identifies the scope of work for reviewing and testing Qwest’s Batch Hot Cut Process.

**AT&T 240 Re: Barrick Direct Testimony**

Please identify and describe any other engagements with ILECs other than Qwest in which Ms. Barrick examined an ILEC’s hot cut process.

Submitted February 10, 2004.

**AT&T COMMUNICATIONS OF  
THE MOUNTAIN STATES, INC.  
AND TCG UTAH**

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