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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In The Matter of the Determination of the Cost of the Unbundled Loop of QWEST CORPORATION, INC.	) DOCKET NO. 01-049-85 ) ) AT&T's Third Set of ) Data Requests to Qwest )
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AT&T Communications of the Mountain States, Inc. ("AT&T") submits the following requests to Qwest Communications Corporation ("Qwest") to be answered by those officers, employees, or agents of Qwest (or its subsidiaries, affiliates or parent companies) who possess the requested information and who are authorized to answer on behalf of Qwest.

In responding to these requests, please refer to the definitions and instructions that were given with AT&T's First Data Request to Qwest.

**DATA REQUESTS**

Where applicable for requests 1 through 14 below please provide the information at the most detailed account level available (ARMIS sub-account and Field Reporting Code with category as contained on Qwest's MR2A and MR5 filed with the Expense Factors Module in this case). The activities below are taken from Qwest's NRC compliance filing in Docket 00-049-105, dated June 25, 2002.

1. Does Qwest use “lump sum” competitively bid contracts for the placement of outside plant facilities in:
  - a. the State of Utah; and
  - b. Qwest’s 14-state region that encompasses the State of Utah?
2. Please produce the Contract Administration guidelines or practices utilized by Qwest in preparing competitively bid “lump sum” contracts. These practices or guidelines should include such items as size or volume of work to be undertaken, capital expenditure (bid threshold \$10,000, \$25,000, \$50,000 or greater) and so forth.
3. What percentage of Qwest’s outside plant construction program was placed by contract labor for the last five years in:
  - a. the State of Utah; and
  - b. the 14-state region?
4. Please produce copies of the most recent three (3) competitively bid lump sum contracts that Qwest has awarded in the State of Utah for the placement of buried outside plant facilities.
5. Please produce copies of the most recent three (3) competitively bid lump sum contracts that Qwest has awarded in the State of Utah for the placement of aerial outside plant facilities.
6. Please produce copies of the most recent three (3) competitively bid lump sum contracts that Qwest has awarded in the State of Utah for the placement of underground outside plant facilities.
7. Has Qwest awarded any competitively bid lump sum contracts for a project, estimate or group of estimates that include the placement of all outside plant facilities, including aerial, buried and underground under a single contract (“turn key” contract)?
  - a. If so, please produce the most recent three (3) turn key contracts for the placement of outside plant facilities?
8. Has Qwest fully implemented the recommendations of the Bain and Company, Inc. review of US West’s contracting practices?
  - a. If not, identify:
    - (i) which recommendations or plans of action have been fully implemented;

- (ii) which recommendations or plans of action have been partially implemented; and
- (iii) which recommendations or plans of action still remain to be implemented?

9. Has Qwest provided a copy of the US West Contracting Review contacted by Bain and Company, Inc. in this docket to the Commission?
  - a. Please produce the Bain and Company Inc. Report in response to this request.
10. Please admit that the “Bain Report” shows unit price premiums in comparison to the competitively bid prices. (*See*, page 35 of Bain Report).
  - a. Identify any and all reasons Qwest would cite to refute the Bain Report’s unit price premiums in comparison to the competitively bid prices.
11. Admit that the Bain Report indicates that “unit prices” increased contract costs compared to competitively bid costs by over 35% on jobs larger than \$50,000. (*See* page 36 of the Bain Report).
  - a. Identify any and all reasons Qwest would cite to refute the Bain Report’s unit prices increased contract costs compared to competitively bid costs by over 35% on jobs larger than \$50,000.
12. Please produce a copy of the most recent outside plant engineering contract Qwest has entered into with CDI or any other outside plant engineering firm explicitly for the State of Utah or covering Qwest’s 14-state region or any portion thereof that encompasses the State of Utah.
13. Do Utah developers or their contractors provide trenches in new developments for placement of Qwest’s facilities? (Such facilities may include conduits, buried cable, buried fiber and drop wires).
  - a. If Qwest’s response is affirmative, please identify all such developers and the locations in which they have provided trenches for Qwest’s use in new developments.
14. Do any Utah developers or contractors place any of Qwest’s facilities for Qwest in new developments.
  - a. If Qwest’s response is affirmative, please identify all such developers and the locations in which they have placed Qwest’s facilities for Qwest.
15. Please provide a copy Qwest’s most recent vendor contract for aerial and buried drop wire material applicable in the State of Utah.

Dated November 12, 2002.

By \_\_\_\_\_  
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