

Attachment B¹

Information Requests to Qwest and Verizon in Docket UT-053025

Information Request No. 1: Please provide a list of wire centers in the Company's service territory in Washington that will be designated as "non-impaired" pursuant to the final rule in Appendix B of the FCC's Triennial Review Remand Order (TRRO) and specifically identify each wire center on the list for DS1 and DS3 Loops, and DS1, DS3 and Dark Fiber transport.

Information Request No. 2: Please identify for each wire center whether it is classified as a tier 1 or tier 2 wire center, and whether the calculation is based on the number of fiber-based collocators (include the names of the collocators)², or the number of business lines (line counts by each carrier)³ or both.

Information Request No.3: For each of the wire centers listed as "non-impaired", please provide a descriptive explanation and data necessary for the Commission and other participants to validate. The underlying data, at minimum, should include the following:

- (i) The total number of fiber-based collocators as defined in 47 C.F.R. § 51.5.
- (ii) The date on which the number of fiber-based collocators was determined.
- (iii) The name of each fiber-based collocator.²
- (iv) If the ILEC requested affirmation from a carrier regarding whether or not the carrier, if included in part (iii) above, was a fiber-based collocator, please provide documents to support whether the carrier affirmed, denied or did not respond to the ILEC's request.
- (v) The total number of business lines as defined in 47 C.F.R. § 51.5.

¹ This Attachment B contains the Washington Utilities and Transportation Commission ("WUTC") information requests to Qwest and Verizon regarding "non-impaired" wire centers for unbundled loops and transport. The only changes to the Commission's information requests are the title ("Attachment B") and these footnotes. These requests were provided via email to parties in the Washington docket by Commission Staff on February 13, 2006. In its email Commission Staff noted that these requests "will be an attachment to the Commission's order issued at a later date."

² The Protective Order, "Order No. 01" issued by the WUTC provides that the identity of any fiber-based collocators in a wire center will be designated as Confidential, as opposed to Highly Confidential. (¶ 5) ([http://www.wutc.wa.gov/rms2.nsf/0/7ED3BB3AD74613AA882571110068E363/\\$file/Order%2BNo.%2B01%2B-%2BProtective%2BOrder.pdf](http://www.wutc.wa.gov/rms2.nsf/0/7ED3BB3AD74613AA882571110068E363/$file/Order%2BNo.%2B01%2B-%2BProtective%2BOrder.pdf))

³ The Protective Order, "Order No. 01" issued by the WUTC provides that the identity of a telecommunications carrier's business lines or line counts will be provided in a "masked" format. Individual CLEC line counts will be identified using a code and will be designated as Confidential. Each individual CLEC will be provided their own code to verify data concerning that carrier. Commission Staff will be provided a code for all carriers. (¶ 5) ([http://www.wutc.wa.gov/rms2.nsf/0/7ED3BB3AD74613AA882571110068E363/\\$file/Order%2BNo.%2B01%2B-%2BProtective%2BOrder.pdf](http://www.wutc.wa.gov/rms2.nsf/0/7ED3BB3AD74613AA882571110068E363/$file/Order%2BNo.%2B01%2B-%2BProtective%2BOrder.pdf))

- (vi) The date on which the business line counts data was calculated. Note: If different components of the business line counts come from sources representing different points in time, then each component should be identified and the corresponding date for each component provided.
- (vii) Total ILEC business switched access lines.
- (viii) If the methodology used to determine the line counts in (vii) above differ from the methodology used to determine switched business line counts for ARMIS 43-08, describe the differences and any data that would allow the Commission or participants to reconcile this data.
- (ix) Total UNE Loops for each CLEC.³
- (x) Number of UNE Loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement).³
- (xi) Number of UNE Loops, for each CLEC, where the ILEC does not provide switching.³
- (xii) If different from (x) above, the number of business loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement). If this information is not available, indicate whether the response to (x) includes both business and residential loops.³
- (xiii) If different from (xi) above, the number of switched business loops, for each CLEC, where the ILEC does not provide switching. If this information is not available, indicate whether the response to (xi) includes both business and residential loops, switched and non-switched loops.³
- (xiv) If the total of UNE Loops in (x) and (xi) above does not equal (ix) above, explain the difference, including any data that would allow participants to reconcile this data.
- (xv) Provide all underlying data, calculations and any description used to count digital access lines on a 64-kbps-equivalent basis for the counts in (vii) and (xi) above.
- (xvi) Verify that line counts associated with remote switch locations are associated with the remote and not the host switch. If this is not the case, explain why not.

Information Request No. 4: If the calculation of number of lines (or inclusion of certain lines) is based on a directive from the FCC as Qwest has indicated during the workshop, please provide the detailed citations of the FCC's decision(s).