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AZ CORP COMMISSION

CASE/COMPANY NAME:

DOCKET NO. FEB 26 1 43 PM '99

In the matter of U.S. West Communications, Inc.'s

T-000008-97-0238

Compliance with the Section 271 of the Telecommunications Act.
D/B/A or RESPONDENT:

DOCUMENT CONTROL

Arizona Corporation Commission

NATURE OF ACTION OR DESCRIPTION OF DOCUMENT DOCKETED

Please mark the item that describes the nature of the case/filing:

01 UTILITIES - NEW APPLICATIONS

FEB 26 1999

- NEW CC&N
- RATES
- INTERIM RATES
- CANCELLATION OF CC&N
- DELETION OF CC&N (TERRITORY)
- EXTENSION OF CC&N (TERRITORY)
- TARIFF - NEW (NEXT OPEN MEETING)
- REQUEST FOR ARBITRATION (Telecommunication Act)
- FULLY OR PARTIALLY ARBITRATED INTERCONNECTION AGREEMENT (Telecom. Act.)
- VOLUNTARY INTERCONNECTION AGREEMENT (Telecom. Act)

- MAIN EXTENSION
- CONTRACT/AGREEMENTS
- COMPLAINT (Formal)
- RULE VARIANCE/WAIVER REQUEST
- SITING COMMITTEE CASE
- SMALL WATER COMPANY -SURCHARGE (Senate Bill 1252)
- SALE OF ASSETS & TRANSFER OF OWNERSHIP
- SALE OF ASSETS & CANCELLATION OF CC&N
- FUEL ADJUSTER/PGA
- MERGER
- FINANCING
- MISCELLANEOUS Specify

DOCKETED BY llw

02 UTILITIES - REVISIONS/AMENDMENTS TO PENDING OR APPROVED MATTERS

- APPLICATION COMPANY DOCKET NO.

- TARIFF PROMOTIONAL DECISION NO. DOCKET NO.
- COMPLIANCE DECISION NO. DOCKET NO.

SECURITIES or MISCELLANEOUS FILINGS

- 04 AFFIDAVIT
- 12 EXCEPTIONS
- 18 REQUEST FOR INTERVENTION
- 48 REQUEST FOR HEARING
- 24 OPPOSITION
- 50 COMPLIANCE ITEM FOR APPROVAL
- 32 TESTIMONY
- 47 COMMENTS

- 29 STIPULATION
- 38 NOTICE OF INTENT (Only notification of future action/no action necessary)
- 43 PETITION
- 46 NOTICE OF LIMITED APPEARANCE
- 39 OTHER Letter dated 2/22/99 from US West to Specify all parties of record, advising them of DATA Requests that were served upon the Intervenor. Attached: Atty DATA Request

Date

U.S. West Communications, Inc. Stefanie L. Miller
Print Name of Applicant/Company/Contact person/Respondent/Atty.
303-672-2824
Phone

PLEASE SEE NOTICE ON REVERSE SIDE

U S WEST, Inc.
1801 California Street
Suite 5100
Denver, Colorado 80202
Telephone (303) 672-2824
Facsimile (303) 295-7049

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FAC CORP CORPIS U S WEST
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life's better here ®

Stefanie Miller
Paralegal

DOCUMENT CONTROL

Via U.S. Mail

February 22, 1999

TO: All Parties of Record

Re: Docket No. T-00000B-97-0238

Please be advised that U S WEST propounded forty one (41) identical data requests upon AT&T, Brooks, Cox, ELI, e.spire, GST, McLeodUSA, MCI, Sprint, TCG and TRA on February 19, 1999. The identical data requests were also sent to ACI on February 22, 1999. Attached please find an example of the above-mentioned data requests.

Sincerely,



Stefanie Miller
Paralegal to Charles Steese

Enclosure

I hereby certify that on this this 22nd day of February, 1999, a true and correct copy of the above and foregoing was served via U.S. mail, postage prepaid thereon and addressed to the following:

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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE U S WEST)
COMMUNICATIONS, INC.'S)
COMPLIANCE WITH SECTION 271 OF)
THE TELECOMMUNICATIONS ACT) Docket No. U-0000-97-238
OF 1996)
)
)
)

U S WEST'S FIRST SET OF DATA REQUESTS
TO AT&T COMMUNICATIONS, INC.

TO: Richard S. Wolters
Maria Arias-Chapleau
AT&T Communications, Inc.
1875 Lawrence Street, Suite 1500
Denver, CO 80202

U S WEST Communications, Inc., ("U S WEST" or "USWC") serves its First Set of Data Requests upon AT&T Communications, Inc. ("AT&T"). U S WEST requests that AT&T serve its responses within 10 days from this date upon Charles W. Steese via hand-delivery or overnight mail at U S WEST Communications, Inc., 1801 California Street, Suite 5100, Denver, Colorado 80202.

DEFINITIONS

As used herein, the following terms have the meaning set forth below:

1. The terms "AT&T," "you," and "your" refer to AT&T Communications of the Mountain States, Inc., and its parents, subsidiaries and affiliates, and includes any director, officer, employee, servant, agent, consultant,

expert advisor, independent contractor or representative of it, and any other person acting under its control or on its behalf for any purpose.

2. As used in these data requests, the terms "document" or "documents" and "documentary material" include but are not limited to the following items, whether printed, recorded, written, or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions and orders; intraoffice and interoffice communications; correspondence; memoranda; financial data; summaries or records of conversations or interviews; statements; returns; diaries; workpapers; graphs; notebooks; notes; charts; computations; plans; drawings; sketches; computer printouts; summaries or records of meetings or conferences; summaries or reports of investigations or negotiations; opinions or reports of consultants; photographs; brochures; bulletins; pamphlets; books; articles; advertisements; circulars; press releases; graphic records; representations or publications of any kind (including microfilm, microfiche, videotape, and records however provided or reproduced); electronic, mechanical and electrical records of any kind (including without limitation tapes, tape cassettes, discs and records); other data compilations (including without limitation input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, discs and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand, or use the same); all drafts, prints, issues, alterations, modifications, changes and amendments of the foregoing; and other documents and tangible things of whatever description

which constitute or contain information within the scope of a Data Request or request to produce and which are in the possession, custody, or control of AT&T.

3. The term "identify," when used with respect to the terms "documents" and "documentary materials," means to furnish an exact description of each item sought to be identified by dates, subject matter, name(s) of individuals who wrote, signed, initialed, dictated or otherwise participated in the creation or makeup of the same, and the name(s) and address(es) of each person having possession, custody or control of such item. If any such item was, but is no longer, in the possession, custody, or control of a named member or representative of AT&T, or is no longer in existence, state the date, manner of, and reason for its disposition.

4. The terms "identify and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

5. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

6. The terms "identify" and "identity" with respect to any non-written communication means to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time

of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

7. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefor, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

8. The terms "relates to" or relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

9. The term "including" means "including, but not limited to."

10. The phrase "possession, custody or control" includes the joint and several possession, custody, or control not only by one or more employees or representatives of AT&T, but also by each or any person acting or purporting to act on behalf of AT&T or any of its employees or representatives whether as an agent, independent contractor, attorney, consultant, witness, or otherwise.

11. "Entity" or "entities" means any corporation, unincorporated association, sole proprietorship, partnership, individual, department, agency or consulting firm.

12. The phrase "other 13 states" refers to: Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming.

13. The acronym "OSS" means operation support system, and the acronym RBOC means Regional Bell Operating Company.

INSTRUCTIONS

14. Each request shall be answered in full on the basis of your entire knowledge, including all information in the possession of you, your directors, officers, employees, servants, agents, consultants, expert advisors, representatives, and attorneys. If any of the requests cannot be answered in full, you are to answer the request to the extent possible, specifying the reason for your inability to answer the remainder of the request.

15. For each request answered, provide the name of the person or persons answering, the title of such person(s), and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document produced.

16. In answering each request, please restate the entire request above the response.

17. Each request is continuing in nature. Thus, if you acquire additional information after you have initially answered any request, you are required to supplement your response following the receipt of such additional information, giving the additional information to the same extent as originally requested. If you are unwilling to supplement your responses, please so state.

18. If you claim 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:

- (a) the date and number of pages of the document;
- (b) the identity of the author(s) and/or preparer(s);
- (c) the identity of the addressee, if any;
- (d) the title;
- (e) the type of tangible thing (e.g., letter, memorandum, telegram, chart, report, recording disc);
- (f) the subject matter (without revealing the information as to which privilege protection from non-disclosure claimed);
- (g) the identify of each person who has received the document or to whom knowledge of the contents of the document was communicated;
- (h) the identity of the present custodian(s);
- (i) the nature of your claim of non-discoverability (e.g., attorney-client privilege); and
- (j) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit U S WEST to make a full determination as to whether your claim is valid.

19. If in answering these data requests you encounter any ambiguity in construing the request or a definition or instruction relevant to this inquiry contained within the interrogatory or request, set forth the matter deemed

"ambiguous" and set forth the construction chosen or used in answering the interrogatory or responding to the request.

20. In the event AT&T asserts that any requested information is public information otherwise available to U S WEST, AT&T in its written response should identify the following:

(a) The title or description of the data claimed to be public information;

(b) The specific page and line number on which the requested material can be found; and

(c) The address of the office(s) and/or other location(s) where the document or file containing the requested material is maintained for public inspection.

21. In the event that AT&T asserts that any requested information is not available in the form requested, AT&T should in its written response disclose the following:

(a) The form in which the requested information currently exists (identifying documents by title or description); and

(b) The earliest dates, time period, and location that representatives of U S WEST may inspect AT&T's files, records or documents in which the requested information currently exists.

22. The foregoing Instructions are incorporated by reference as a supplement to each request listed below.

23. It is not sufficient to state the information requested will be provided in testimony unless the identity of the person testifying, the specific page number, and line number is provided.

24. Unless otherwise stated, the data requests concern the time period from February 8, 1996 to the present.

DATA REQUESTS

REQUEST NO. 1.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of interconnection in accordance with the requirements of §251(c)(2) and §252(d)(1). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of interconnection. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of interconnection.

(Checklist Item No. 1)

REQUEST NO. 2.

Please identify each U S WEST central office or other location in Arizona where AT&T collocates or intends to collocate within the next 24 months. For each projected location where AT&T intends to collocate with U S WEST within the next 24 months, state whether AT&T intends to collocate physically or

virtually, and produce all documents relating to these collocation plans.

(Checklist Item No. 1)

REQUEST NO. 3.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of non-discriminatory access to poles, ducts, conduits, and rights of way that U S WEST owns or controls. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of poles, ducts, conduits, and rights of way. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of poles, ducts, conduits, and rights of way. (Checklist Item No. 3)

REQUEST NO. 4.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of local loop transmission from the central office to the customer's premises, unbundled from local switching or other services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of unbundled local loop transmission. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of local loop transmission from the central office to the customer's premises, unbundled from local switching or other services. (Checklist Item No. 4)

REQUEST NO. 5.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of local transport from the trunk side of the wireline local exchange carrier switch, unbundled from switching or other services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of unbundled local transport. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of local transport from the trunk side of the wireline local exchange carrier switch, unbundled from switching or other services. (Checklist Item No. 5)

REQUEST NO. 6.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of local switching unbundled from transport, local loop transmission, or other services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of unbundled local switching. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of local switching unbundled from transport, local loop transmission, or other services. (Checklist Item No. 6)

REQUEST NO. 7.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of nondiscriminatory access to 911 and E911 services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of these services. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of 911 and E911 services. (Checklist Item No. 7(I))

REQUEST NO. 8.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of directory assistance services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of these services. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of directory assistance services. (Checklist Item No. 7(II))

REQUEST NO. 9.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of operator call completion services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of these services. This request also includes, but is not limited to, any documents

containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of operator call completion services. (Checklist Item No. 7(III))

REQUEST NO. 10.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of white pages directory listings for customers of other carriers' telephone exchange services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of white pages directory listings. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of white pages directory listings for customers of other carriers' telephone exchange services. (Checklist Item No. 8)

REQUEST NO. 11.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of nondiscriminatory access to databases and associated signaling necessary for call routing and call completion. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of databases and associated signaling. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of nondiscriminatory access to databases and

associated signaling necessary for call routing and call completion. (Checklist Item No. 10)

REQUEST NO. 12.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of interim and/or long-term number portability. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of interim and/or long-term number portability. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of interim and/or long-term number portability. (Checklist Item No. 11)

REQUEST NO. 13.

Describe each complaint, problem, or concern you have relating to the availability from U S WEST of reciprocal compensation arrangements in accordance with the requirements of §252(d)(2). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to the reciprocal compensation arrangements that U S WEST provides. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about the reciprocal arrangements that U S WEST provides or makes available. (Checklist Item No. 13)

REQUEST NO. 14.

Describe each complaint, problem, or concern you have relating to U S WEST's provisioning of telecommunications services available for resale in accordance with the requirements of §251(c)(4) and 252(d)(3). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to U S WEST's provisioning of telecommunications services available for resale. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments, or analyses about U S WEST's provisioning of telecommunications services available for resale. (Checklist Item No. 14)

REQUEST NO. 15.

Please identify all entities other than U S WEST, including AT&T itself, from which AT&T has obtained, or can obtain, for use in Arizona or in any of the other 13 states in U S WEST's region any of the following elements, items, or services: (1) local loops; (2) network interface devices; (3) local switching; (4) interoffice transmission facilities; (5) vertical features; (6) directory assistance; and (7) operator services. Produce all documents that relate to your ability to obtain such elements, items or services for use in Arizona or in any of the other 13 states in U S WEST's region.

REQUEST NO. 16.

Please produce all documents reflecting, referring, or relating to any analysis by AT&T concerning: (1) whether the quality of any local telecommunications service AT&T provides in Arizona or in the other 13 states in

U S WEST's region is or may be affected by the ability to obtain from U S WEST any of the elements, items, or services listed in the preceding data request; and (2) whether the ability to obtain from U S WEST any of the elements, items, or services listed in the preceding data request is necessary for AT&T to provide local telecommunications service in Arizona or in any of the other 13 states in U S WEST's region.

REQUEST NO. 17.

For Arizona and the other 13 states in U S WEST's region, please describe on a state-specific basis AT&T's projected demand over the next 24 months for the following elements, items, and services that AT&T expects to obtain from U S WEST: (1) interconnection; (2) access to poles, ducts, conduits, and rights of way; (3) local loop transmission from the central office to the customer's premises, unbundled from local switching or other services; (4) local transport from the trunk side of the wireline local exchange carrier switch, unbundled from switching or other services; (5) local switching unbundled from transport, local loop transmission, or other services; (6) vertical features; (7) access to 911 and E911 services; (8) directory assistance services; (9) operator call completion services; (10) white pages directory listings; (10) access to databases and associated signaling necessary for call routing and call completion; (11) interim and/or long-term number portability; (12) reciprocal compensation arrangements; and (13) telecommunications services available for resale. Produce all documents that reflect, refer, or relate to AT&T's projected demand for these elements, items, and services.

REQUEST NO. 18.

Does AT&T have a real-time operational support system that AT&T's service representatives use to place customer service requests, local service requests or any other requests that AT&T uses to order local telecommunications products or services? If so, for Arizona and the other 13 states in U S WEST's region, provide the name of the system(s), the products and services the system(s) support(s), the date the system(s) was deployed, and the data, functional message, and transport protocols used for the system(s). Produce all documents that refer to, reflect or relate to the products and services the system(s) supports, the date the system(s) was deployed, and/or the data, functional message, and transport protocols used for the system(s).

REQUEST NO. 19.

If AT&T does not have an ordering system of the type described in the previous data request, please state all mechanisms, manual and otherwise, it uses to support the negotiation and ordering process for its local exchange customers, and state the functionality provided by each of the mechanisms. Produce all documents that describe, define, outline or otherwise explain these mechanisms, including but not limited to documents that describe or otherwise reflect the functionality that each mechanism provides.

REQUEST NO. 20.

Does AT&T follow any specific development, implementation, and testing guidelines when it develops OSS software for use in the local exchange market?

If so, produce all documents containing the guidelines that AT&T follows or, if the guidelines are not written, describe them.

REQUEST NO. 21.

For Arizona and the other 13 states in U S WEST's region, please state whether AT&T maintains any data relating to whether there have been errors in local service requests ("LSRs") or orders that AT&T has submitted to U S WEST. If AT&T maintains any such data, describe the nature of the information you maintain, and produce all documents that reflect, refer, or relate to any occurrences of errors in LSRs or orders that AT&T has submitted to U S WEST.

REQUEST NO. 22.

Identify each electronic interface AT&T requires to provide local service in Arizona and the other 13 states in U S WEST's region for the purpose of obtaining access to U S WEST's pre-ordering, ordering, provisioning, billing, and maintenance and repair systems. For each interface that AT&T identifies, please provide the following: (1) identify each interface that AT&T believes is not available from U S WEST; (2) if the interface is available and AT&T contends it is inadequate, describe in detail each concern that AT&T has about the adequacy of U S WEST's interface; (3) the date AT&T requires the interface to be made available from U s WEST for testing by AT&T; and (4) when AT&T intends to begin using the interface to provide local exchange service in Arizona and the other 13 states in U S WEST's region. Produce all documents that relate to any of the responses that AT&T provides to this data request.

REQUEST NO. 23.

If AT&T contends that other ILECs are meeting any of AT&T's electronic interface needs relating to local exchange service, unbundled network element, or any other aspect of local service, identify the ILEC(s), describe the system(s) or interface(s) the ILEC(s) is using, and provide the name of a contact person at the ILEC(s) who is familiar with the system. Produce all documents that discuss, describe, or otherwise explain and/or discuss the capabilities of any such system(s) or interface(s).

REQUEST NO. 24.

On average, how many electronic interface orders for some form of local exchange service has AT&T placed with ILECs per day over the past year? Please provide a breakdown by state, ILEC, and order type of all electronic interface orders AT&T has placed with ILECs during the past year. Produce all documents that demonstrate, reflect, or refer to the number and/or type of electronic interface orders for local exchange service that AT&T has placed with ILECS in the past year, including but not limited to documents containing breakdowns of this information by state, ILEC, and order type.

REQUEST NO. 25.

Has AT&T used any ILEC's graphical user interface ("GUI") or human-to-computer interface that supports local exchange service in any local telecommunications market in the United States within the past 24 months? If so, please identify each interface AT&T has used, the ILEC who provides the interface, and the market in which AT&T used the interface. If AT&T has used a

GUI or human-to-computer interface within the past 24 months, produce all documents that discuss, describe or otherwise explain the interface(s) it has used, the ILEC who provides the interface(s), and/or the market in which AT&T used the interface(s).

REQUEST NO. 26.

For each facilities-based, local telecommunications service that AT&T provides in any of the states in U S WEST's region, describe all provisioning commitments or representations that AT&T gives to its customers, including but not limited to: (1) the average, anticipated time interval for installing the service; and (2) the average, anticipated amount of time the customer will be out of service to allow for a change of carriers through a loop cut-over. State whether the provisioning commitments or representations that AT&T provides vary at all depending on whether AT&T is using facilities provided by U S WEST or facilities provided by some other source. Produce all documents that reflect, refer to, or relate to any provisioning commitments or representations that AT&T provides to its customers for each such facilities-based, local telecommunications service that AT&T provides in U S WEST's region.

REQUEST NO. 27.

Produce copies of all documents relating to presentations, marketing materials, sales efforts and related materials that AT&T representatives use in their discussions with local exchange customers or in mass marketing of customers to promote or sell any local telecommunications service in U S

WEST's region, including, but not limited to, written scripts and other prepared presentations.

REQUEST NO. 28.

Please state whether AT&T measures or tracks in any way the time per call that its local service sales and marketing representatives spend on the telephone with customers to promote or sell AT&T's local telecommunications services and to arrange for provisioning services. If AT&T does measure or track the time for these calls, describe the nature of the information it records, and produce all documents that contain, refer, or relate to data of this type for all states in U S WEST's region.

REQUEST NO. 29.

Please state the hours of operation for AT&T's local exchange units or offices in Arizona and in the other 13 states in U S WEST's region, and produce documents that show the hours of operations for these units or offices.

REQUEST NO. 30.

Please provide the following information for all states in U S WEST's region for all local telecommunications services that AT&T provides using only its own facilities: (1) the percentage of customer commitments met for provisioning and repairs; (2) the percentage of held orders; (3) the percentages of network blockage that AT&T is experiencing, both in its network and outside of its network; and (4) the average repair intervals. Please provide the same information requested above for all states in U S WEST's region for all local telecommunications services that AT&T provides using any facilities provided by

U S WEST. Produce all documents that contain, refer, or relate to any such performance results for both instances where AT&T uses U S WEST's facilities and instances where it uses exclusively its own facilities for Arizona and the other 13 states in U S WEST's region.

REQUEST NO. 31.

Within U S WEST's region, does AT&T measure or track the frequency with which its local service sales and marketing representatives contact local exchange customers who have pending orders to notify them of the receipt of or changes to: (1) order rejection notices; (2) firm order confirmation notices; (3) completion notices; and (4) jeopardy notices? If AT&T does measure or track this information, describe the nature of the information it records, and produce all documents that contain, refer, or relate to data of this type for all states in U S WEST's region. In addition, please produce any documents that reflect AT&T's policies and procedures data for informing its local exchange customers of receipt of or changes to the notices listed in this data request and/or summarizes, discusses or otherwise explains such performance data.

REQUEST NO. 32.

On a sustained basis, without the use of temporary support from other groups within AT&T, what is the absolute number of local service requests and orders that AT&T is presently capable of issuing, by interface type, on a business day basis (e.g., LSRs and orders per business day)? Please provide an attestation of the individual that is furnishing this information, and produce all

documents that support, refer, or relate to the number of LSRs and orders that AT&T is capable of issuing per business day.

REQUEST NO. 33.

For Arizona and the other 13 states in U S WEST's region, please provide: (1) the projected number of local service requests and orders per business day that AT&T expects to place with U S WEST, by interface type, over the next 24 months; and (2) the total projected demand from AT&T for all pre-order transactions, by quarter, over the next 24 months. Produce all documents that reflect, support, or relate to these projections.

REQUEST NO. 34.

Does AT&T intend to commit, in association with U S WEST, to the development and/or availability of a production-ready OSS EDI for pre-ordering, ordering, and maintenance and repair for residential POTS and small business? If so, when? If not, why not? Produce all documents that discuss, refer, or relate to any consideration by AT&T of whether to, and/or when to develop an OSS EDI interface in association with U S WEST, including, but not limited to, documents relating to AT&T's decision in the past to terminate or suspend this type of development with U S WEST.

REQUEST NO. 35.

For each state in U S WEST's region, please provide the number of orders for facilities-based services that AT&T has submitted to any ILEC: (1) by any means, manual or otherwise, within the past year; and (2) through an electronic interface within the past year. Produce all documents that show the

number of orders that AT&T has placed through these means within the past year.

REQUEST NO. 36.

For Arizona and the other 13 states in U S WEST's region, project the maximum number of AT&T transactions U S WEST will be required to process on average, per day for the functions of pre-ordering, ordering, billing, and maintenance and repair over the next 24 months. Describe in detail the basis for your response, and produce all documents that reflect or relate to these projected transactions.

REQUEST NO. 37.

Produce all documents concerning how (i.e.: through its own facilities, unbundled network elements, resale, or combination), where, and when (if at all) AT&T currently plans to become a local exchange provider in Arizona. If AT&T intends to become a facility-based provider in Arizona using unbundled network elements, identify the elements and the projected quantities you will need on a monthly basis from U S WEST for each of the next 24 months, and produce all documents that reflect, refer, or relate to the these projected needs need for use in Arizona during this period.

REQUEST NO. 38.

Identify all towns, cities, and states in U S WEST's region in which you anticipate initiating local service within: (A) 90 days; (B) 180 days; (C) 1 year; (D) 2 years; (E) 5 years. Produce all documents that discuss, refer, or relate to the identities of the towns, cities, and states in which you anticipate initiating local service

within these time frames, including, but not limited to, all documents that reflect, refer, or relate to AT&T's strategy for entering the local exchange markets in U S WEST's region by targeting select markets. This request specifically includes, but is not limited to, documents that reflect separation of cities, states, or portions of states into tiers of importance.

REQUEST NO. 39.

Produce all documents created at any time from January 1, 1994, to the present that identify or discuss the states and cities where AT&T has intended to serve as a local telecommunications provider, whether through resale or otherwise, including any and all documents that include rankings -- by priority, importance, potential revenue or any other criteria -- of states or cities for local market entry. This request includes, but is not limited to, any and all documents that reflect changes in the priority that AT&T has given to states and cities for local market entry. This request specifically includes, but is not limited to, documents relating to AT&T's plans for entering the local exchange markets in Connecticut or in any other state that discuss, refer, or relate to the entry of Southern New England Telephone Company ("SNET") and whether or not AT&T's plans for entering Connecticut changed over time.

REQUEST NO. 40.

Produce any documents that discuss, refer, or relate to any analyses by AT&T concerning how competition will change in Arizona's local and long distance markets if U S WEST is authorized to compete in the interLATA market in that state.

REQUEST NO. 41.

If AT&T contends that U S WEST is impeding in any way AT&T's entry into the local exchange market in Arizona or in any of the other 13 states in U S WEST's region, produce all documents that support, refer, or relate to that contention.

DATED this 19th day of February, 1999.

U S WEST COMMUNICATIONS, INC.

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