

ORIGINAL



0000009782

BEFORE THE ARIZONA CORPORATION COMMISSION

30MO

MARC SPITZER  
Chairman  
WILIAM A. MUNDELL  
Commissioner  
JEFF HATCH-MILLER  
Commissioner  
MIKE GLEASON  
Commissioner  
KRISTIN K. MAYES  
Commissioner

2004 SEP 17 P 2:53

AZ CORP COMMISSION  
DOCUMENT CONTROL

Arizona Corporation Commission  
**DOCKETED**

SEP 17 2004

DOCKETED BY *CAF*

IN THE MATTER OF QWEST CORPORATION'S  
FILING OF RENEWED PRICE REGULATION  
PLAN

Docket No. T-01051B-03-0454

IN THE MATTER OF THE INVESTIGATION OF  
THE COST OF TELECOMMUNICATIONS  
ACCESS

Docket No. T-00000D-00-0672

**MOTION TO COMPEL QWEST CORPORATION  
TO RESPOND TO COMMISSION STAFF DATA REQUESTS**

Staff of the Arizona Corporation Commission ("Commission Staff") hereby moves to compel Qwest Corporation ("Qwest" or "the Company") to respond to all outstanding discovery requests.

**I. BACKGROUND**

In its July 1, 2004, Procedural Order, the Commission ordered that "responses to discovery requests shall be made within 10 calendar days of receipt." (Order at p. 3). Yet, the average lag time for responses provided to one of Staff consultant's ("Utilitech") data requests is now approximately 22.9 days. As of today, Utilitech is still awaiting responses to approximately 87 data requests that are overdue (i.e., outstanding for more than ten calendar days), and have now been outstanding for an average of 28.3 days. Some of these data requests were issued as far back as June and July of 2004. With Staff's testimony due on October 19, 2004, and with knowledge that certain of the responses may require further follow-up once provided by Qwest, the discovery delays have become so acute that formal action is now required.

1 For Staff's other consultant, William Dunkel and Associates, Qwest has responses which are  
2 outstanding and overdue for approximately 30 data requests, all of which have been outstanding for  
3 approximately 2-3 weeks. Qwest is also overdue in its responses to approximately 2 Staff data  
4 requests.

5 Staff has routinely been working with Qwest through informal channels to obtain responses to  
6 its data requests on a more timely basis. In Staff's last meeting with Qwest on Wednesday of this  
7 week, Qwest was unable to provide Staff with a definitive response date for approximately 60 of the  
8 Utilitech data requests outstanding at that time. Qwest committed to go back to its people working  
9 the various issues to attempt to get dates certain for their responses – a process Qwest said would  
10 require three to four days to complete. Qwest has committed to provide some response times to the  
11 Staff on Monday, September 20, 2004.

12 When questioned about the delays, Qwest has indicated that the longer response times are due  
13 in large part to reduced staffing levels. However, this is cold comfort to Staff, which is trying very  
14 hard and in good faith to comply with the accelerated schedule in this case. Receipt of responses  
15 approaching an average of 30 days, rather than 10 as required, has adversely affected the Staff's  
16 ability to assemble its case in a timely manner and to conduct any necessary follow-up discovery.

17 The need to issue follow-up discovery can arise due to various circumstances. Responses  
18 may provide new, previously unknown information that must be explored and evaluated in greater  
19 detail. Other responses may require clarification or raise new questions or concerns. Yet other  
20 responses may require follow-up questions because the information provided is non-responsive or is  
21 wholly inadequate for Staff review and evaluation. For example, Staff received one partial response  
22 today (September 17, 2004) to UTI 14-3 concerning advertising. This request was, itself, a follow up  
23 and referred to UTI 2-18 and UTI 2-19, seeking various explanations and supporting data from the  
24 Company. (See Qwest's response to UTI 14-3 attached as Exhibit C). Although the Company did  
25 provide a partial response to items (a) through (c), Staff considers UTI 14-3 to remain outstanding  
26 because the response to items (d)-(g) still states: "Qwest is in the process of gathering this  
27 information and will provide it as soon as possible." Staff issued its first advertising discovery to  
28 Qwest on June 8, 2004 and is still waiting for data. This form of response hampers Staff's ability to

1 analyze important aspects of the Company's asserted revenue requirement and delays productive  
2 work in this area. Upon receipt of a full response to UTI 14-3, Staff anticipates that further follow-up  
3 and review may still be necessary.

4 Qwest has also complained that they believe that Staff is conducting excessive discovery in  
5 this case, and has made comparisons with the 1999 rate case. However, these claims fail when one  
6 considers that to-date in this case the Staff and its consultants have issued only 684 data requests  
7 compared to more than 1495 issued by Staff and its consultants in the 1999 case. In addition, some  
8 of the 684 data requests issued by Staff and its consultants in this case were directed not to Qwest, but  
9 to CLECs, in an attempt to assess the degree of competition in telecommunications markets in  
10 Qwest's service area. Moreover, this case is not on the traditional R14-2-103 schedule but is on an  
11 accelerated schedule.

12 In exchange for an accelerated schedule, Qwest committed that it would do nothing to delay  
13 Staff's ability to file its case in a timely manner. Qwest is not living up to its commitment as  
14 evidenced by its average response times in this case. Staff's repeated efforts to resolve these issues  
15 with Qwest have been unsuccessful. Given that Staff's testimony is due in approximately one month,  
16 Staff respectfully requests an expedited hearing on its Motion.

## 17 II. ARGUMENT

18 Attached to this Motion as Exhibit A is the most recent Data Request Log prepared by  
19 Utilitech. An examination of this Log reveals that the data requests that Qwest is delaying  
20 responding to fall into several discrete categories: 1) affiliate transactions, 2) employee staffing and  
21 expense issues, 3) consolidated financial information, 4) ad and marketing programs, and 5) incentive  
22 compensation issues. Given that Qwest has not filed objections to providing much of the information  
23 requested, Staff requests that the Company be ordered to immediately provide the information in  
24 response to the data requests.

25 Staff's consultants require this information in order to test Qwest's claims that it has a revenue  
26 deficiency of over \$300 million and its request to have pricing flexibility which would allow it to  
27 recoup a portion of this amount. It is critical that Qwest be required to provide the information  
28

1 immediately since it is likely that Staff's consultants will need to conduct follow-up discovery on  
2 some of the responses received.

3 According to Staff's records, Qwest has not filed objections to the following Utilitech data  
4 requests which responses remain outstanding and overdue:

|    |          |           |           |
|----|----------|-----------|-----------|
| 5  |          |           |           |
| 6  | UTI 4-30 | UTI 11-10 | UTI 12-18 |
| 7  | UTI 6-13 | UTI 11-11 | UTI 12-19 |
| 8  | UTI 6-14 | UTI 11-12 | UTI 12-20 |
| 9  | UTI 7-3  | UTI 11-16 | UTI 13-1  |
| 10 | UTI 7-6  | UTI 11-18 | UTI 13-2  |
| 11 | UTI 7-16 | UTI 11-19 | UTI 13-3  |
| 12 | UTI 8-3  | UTI 11-20 | UTI 13-5  |
| 13 | UTI 8-4  | UTI 11-21 | UTI 13-6  |
| 14 | UTI 8-38 | UTI 11-22 | UTI 13-7  |
| 15 | UTI 8-39 | UTI 11-23 | UTI 13-9  |
| 16 | UTI 9-2  | UTI 11-24 | UTI 13-10 |
| 17 | UTI 9-3  | UTI 11-25 | UTI 13-11 |
| 18 | UTI 9-10 | UTI 12-1  | UTI 13-12 |
| 19 | UTI 9-11 | UTI 12-2  | UTI 14-1  |
| 20 | UTI 9-12 | UTI 12-3  | UTI 14-3  |
| 21 | UTI 9-15 | UTI 12-5  | UTI 14-4  |
| 22 | UTI 9-19 | UTI 12-6  | UTI 14-5  |
| 23 | UTI 9-20 | UTI 12-7  | UTI 14-6  |
| 24 | UTI 10-1 | UTI 12-8  | UTI 14-7  |
| 25 | UTI 10-5 | UTI 12-9  | UTI 14-8  |
| 26 | UTI 10-7 | UTI 12-10 | UTI 14-9  |
| 27 | UTI 10-8 | UTI 12-11 | UTI 14-10 |
| 28 | UTI 11-1 | UTI 12-12 | UTI 14-11 |
|    | UTI 11-3 | UTI 12-13 | UTI 14-13 |
|    | UTI 11-4 | UTI 12-14 | UTI 14-14 |
|    | UTI 11-6 | UTI 12-15 | UTI 14-15 |
|    | UTI 11-7 | UTI 12-16 | UTI 14-18 |
|    | UTI 11-8 | UTI 12-17 | UTI 14-19 |

Qwest's responses to the above sets of data requests were due on the following dates:

UTI Set 4: July 1, 2004

UTI Set 6: July 23, 2004

UTI Set 7: August 16, 2004

UTI Set 8: August 16, 2004

1 UTI Set 9: August 17, 2004  
2 UTI Set 10: August 20, 2004  
3 UTI Set 11: August 26, 2004  
4 UTI Set 12: August 31, 2004  
5 UTI Set 13: September 8, 2004  
6 UTI Set 14: September 14, 2004

7 Staff requests that Qwest be ordered to immediately provide responses to the above listed  
8 Utilitech data requests to which it has filed no objections. In addition, Exhibit B shows the 30  
9 outstanding and overdue responses to Dunkel and Associates data requests. According to Staff's  
10 records, no objections were filed on any of these data requests. Therefore, Staff requests that Qwest  
11 be ordered to immediately provide responses to the 30 Dunkel data requests that are outstanding and  
12 overdue as shown on Exhibit B. Qwest should also be ordered to provide responses to the Staff  
13 requests identified on Exhibit B as well.

14 Qwest filed objections to only two (2) of the outstanding Utilitech data requests according to  
15 Staff records: UTI 11-14 and UTI 11-17. Staff requests that Qwest be ordered to provide responses  
16 to these three data requests for the following reasons:

17 **1. UTI 11-14**

18 UTI 11-14 asks: "Please provide a detailed breakdown of QCII consolidated income tax  
19 expenses and cash payments to the IRS for calendar years 2002 and 2003, indicating how such  
20 amounts are assigned or allocated among each of the parent company's subsidiaries in each year. In  
21 addition, provide copies of all income tax allocation agreements and explain how such agreements  
22 provide for the attribution of tax deductions, credits, net operating loss carry forward/back position  
23 and tax deferral accounting among subsidiaries of QCII."

24 Qwest objects to providing this information on the grounds that it seeks information that is  
25 not relevant and is not calculated to lead to the discovery of admissible evidence.

26 Staff disagrees and believes that the requests are reasonably calculated to lead to the discovery  
27 of information relevant to the issues in this proceeding. Qwest has asserted a revenue requirement in  
28 excess of \$300 million (see Schedule A-1 of Qwest revised R14-2-103 schedules filed June 21, 2004)

1 that includes well over \$100 million of income tax expenses. However, given substantial losses  
2 reported at the consolidated level and to some extent on consolidated tax returns, it is possible or  
3 even likely that none of the income taxes being collected from customers will result in tax payments  
4 to the IRS or states. Staff would like the Commission to understand whether or not QCII (the  
5 taxpaying parent) is receiving cash flow benefits from the positive taxable income arising from its  
6 utility operations and related recovery of positive income taxes from ratepayers that allows expedited  
7 realization of accumulated net operating loss positions at the consolidated level. With this  
8 information, Staff may propose some equitable adjustment in evaluating the revenue requirement in  
9 this Docket.

10       2.     UTI 11-17

11       UTI 11-17 asks: "According to Qwest Corporation's 2003 ARMIS Report 43-02 at Table I-  
12 17, payments exceeding \$1 million to the following outside legal service vendors were made. Please  
13 explain the activities undertaken by each such law firm, provide a listing of the cases in which they  
14 were retained, and provide the amounts allocated to Arizona Intrastate operations associated with  
15 such work for each listed vendor:

- 16           a)     DORSEY & WHITNEY LLP
- 17           b)     FENNEMORE CRAIG
- 18           c)     HOGAN AND HARTSON
- 19           d)     PERKINS COIE
- 20           e)     STOEL RIVES LLP
- 21           f)     WILMER CUTLER & PICKERING"

22       Qwest objects to providing this information because it states that data request is overbroad in  
23 seeking information related to the provision of legal services unrelated to Arizona. Qwest also claims  
24 that the information that is sought is not relevant and is not calculated to lead to the discovery of  
25 admissible evidence. Finally, Qwest asserts that the information is subject to the attorney/client and  
26 work product privileges.

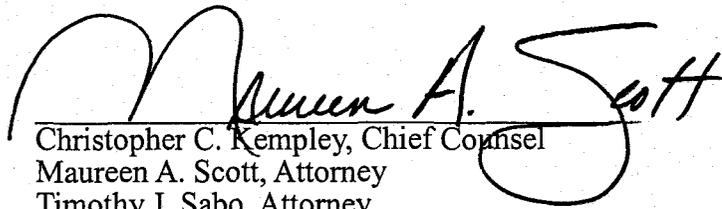
27       Staff disagrees and believes that the information is reasonably calculated to lead to the  
28 discovery of information relevant to the issues in this proceeding for the following reasons. Charges

1 from these firms appear to contribute significant operating expenses to the asserted Qwest revenue  
2 requirement. If the activities undertaken by the firms have been improperly classified between Qwest  
3 Corporation and other QCII affiliates, revenue requirements may be overstated by inclusion of these  
4 costs. Additionally, if the firms are involved in legislative affairs, mergers and acquisitions, defense  
5 of shareholder litigation, ongoing investigations of Qwest by the United States Securities Exchange  
6 Commission or involved in other matters arising from QCII corporate problems not associated with  
7 the regulated telephone business, their fees may be subject to disallowance. Without additional  
8 information to evaluate the nature of services being provided by these firms, Staff is unable to  
9 determine the reasonableness of cost recovery and must disallow these incurred costs due to Qwest's  
10 failure to provide support for same.

11 **III. CONCLUSION**

12 Staff respectfully requests that the Hearing Division schedule, on an expedited basis, a  
13 procedural conference on Staff's Motion. Staff seeks an order from the Commission directing Qwest  
14 to immediately submit responses to all of Staff's and its Consultant's outstanding data requests.  
15 Staff's ability to do follow-up discovery in certain areas has been severely compromised because of  
16 Qwest's delay in providing its responses on a timely basis. Qwest has objected to only 2 of the  
17 outstanding data requests and there is no reason why Qwest should not be required to immediately  
18 respond to all of the data requests for which no objection is pending. In addition, Qwest should be  
19 required to immediately respond to the 2 data requests to which it has lodged an objection because  
20 the information requested is relevant and is reasonably calculated to lead to admissible evidence.

21 RESPECTFULLY SUBMITTED this 17th day of September , 2004.

22  
23  
24 

25 Christopher C. Kempley, Chief Counsel  
26 Maureen A. Scott, Attorney  
27 Timothy J. Sabo, Attorney  
28 Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007  
(602) 542-3402

1 Original and 13 copies of the foregoing  
2 filed this 17th day of September, 2004  
3 with:

4 Docket Control  
5 Arizona Corporation Commission  
6 1200 West Washington  
7 Phoenix, AZ 85007

8 Copy of the foregoing mailed this  
9 17<sup>th</sup> day of September, 2004 to:

10 Jane L. Rodda  
11 Administrative Law Judge  
12 400 West Congress Street  
13 Tucson, AZ 85701

14 Timothy Berg  
15 Theresa Dwyer  
16 Darcy R. Renfro  
17 Fennemore Craig, P.C.  
18 3003 N. Central, Suite 2600  
19 Phoenix, AZ 85012-2913

20 Todd Lundy  
21 Qwest Law Department  
22 1801 California Street  
23 Denver, CO 80202

24 Joan S. Burke  
25 Osborn Maledon, P.A.  
26 2929 N. Central, Suite 2100  
27 Phoenix, AZ 85012-2794  
28 Attorneys for AT&T Communications  
Of the Mountain States and TCG Phoenix

Richard S. Wolters  
AT&T Communications of the  
Mountain States  
1875 Lawrence Street, Suite 1503  
Denver, CO 80202-1870

Scott S. Wakefield  
Chief Counsel  
RUCO  
1110 W. Washington, Suite 220  
Phoenix, AZ 85007

Michael W. Patten  
Roskhka Heyman & DeWulf, PLC  
400 E. Van Buren Street, Suite 800  
Phoenix, AZ 85004

Mark A. DiNunzio  
Cox Arizona Telcom, LLC  
1550 W. Deer Valley Road  
MS DV3-16, Bldg. C  
Phoenix, AZ 85027

Thomas H. Campbell  
Michael T. Hallam  
Lewis and Roca  
40 North Central Avenue  
Phoenix, AZ 85004

Thomas F. Dixon  
WorldCom, Inc.  
707 17<sup>th</sup> Street, 39<sup>th</sup> Floor  
Denver, CO 80202

Patrick A. Clisham  
AT&T Arizona State Director  
320 E. Broadmoor Court  
Phoenix, AZ 85022

Eric S. Heath  
Sprint Communications Company  
100 Spear Street, Suite 930  
San Francisco, CA 94105

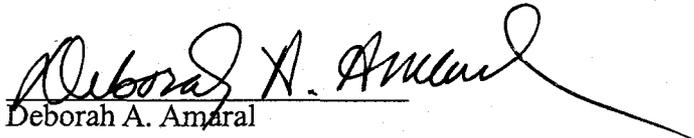
Peter Q. Nyce, Jr.  
Regulatory Law Office  
U.S. Army Litigation Center  
901 N. Stuart Street, Suite 713  
Arlington, VA 22203-1644

Richard Lee  
Snavelly King Majors O'Connor & Lee  
1220 L. Street N.W., Suite 410  
Washington, DC 20005

1 Jon Poston  
ACTS  
2 6733 East Dale Lane  
Cave Creek, AZ 85331

3 Steven J. Duffy  
4 Isaacson & Duffy  
3101 N. Central Avenue, Suite 740  
5 Phoenix, AZ 85012

6 Jeffrey W. Crockett  
7 Snell & Wilmer  
One Arizona Center  
400 East Van Buren  
8 Phoenix, AZ 85004-6070  
*Attorney for ALECA*

9  
10  
11   
12 Deborah A. Amaral

# EXHIBIT A

QWEST CORPORATION  
 ARIZONA CORPORATION COMMISSION  
 Docket No. T-01051B-03-0454  
 DATA REQUEST LOG  
 #16

DATE OF LAST LOG UPDATE..... 17-Sep-04  
 AVERAGE LAG DAYS FOR DATA REQUESTS RECEIVED..... 22.9  
 AVERAGE LAG DAYS FOR ALL DATA REQUESTS ISSUED..... 24.2  
 AVERAGE LAG DAYS FOR OUTSTANDING DATA REQUESTS 28.3  
 NUMBER OF DATA REQUESTS OUTSTANDING..... 87

**REFERENCE CODE:**

A=ACCESS PROVIDED  
 C=RESPONSE CONFIDENTIAL  
 NR=INFORMATION SUPPLIED IS NON-RESPONSIVE  
 O=OBJECTION TO REQUEST  
 P=PROBLEM RESPONSE  
 WC=RESPONSE WITHHELD AS CONFIDENTIAL  
 FU=FOLLOW UP  
 OR=OBJECT BUT RESPONDED  
 V=VOLUMINOUS

| DR No.     | DESCRIPTION   | CODE                       | Disc    | DR Set No. | DATE     |          | LAG DAYS |
|------------|---|----------------------------|---------|------------|----------|----------|----------|
|            |   |                            |         |            | ISSUED   | RECEIVED |          |
| UTI-1 1 1  | Provide copy of all workpapers supporting Company's filing, both hard copy and electronic format  | 7 Partial C, E-1, E-2 7/21 | Y       | 1 1        | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 2  | Provide copies of "close issues" used to identify/quantify unusual/one-time entries   |                            |         | 1 2        | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 3  | Identify/describe each AZ off-book entry and provide quantification of test period armts associated with each                             |                            | Y       | 1 3        | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 4  | Provide copy of reports prepared for/ utilized by mgmt to monitor financial performance of Co AZ totl C                                   |                            | Y       | 1 4        | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 5  | Provide employee stats for each segment of consolidated business indicating headcount by business C                                       | Hardcopy Att 7/15, Sup     | Y       | 1 5        | 06/08/04 | 07/12/04 | 34       |
| UTI-1 1 6  | Provide stat data re: Qwest AZ situs, regional, HQ, contractor personnel  | C                          | Y       | 1 6        | 06/08/04 | 07/12/04 | 34       |
| UTI-1 1 7  | Provide copy of Company's monthly MR, FR and JD series financial operating reports for AZ ops   |                            | Y       | 1 7        | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 8  | Provide copy of Company's AZ ledger for 03 indicating monthly charges by source to each sub-account                                       |                            | Y       | 1 8        | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 9  | Provide a copy of Qwest's current FCC Cost Allocation Manual  |                            | Y       | 1 9        | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 10 | State whether or not the ACC ever affirmatively deregulated Qwest's pay phone business and provid O-R                                     |                            |         | 1 10       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 11 | Grate pg. 128-132: Provide calc of each adj that would be required if rulings in 93 were implemented Supp 7/26, Att A 7/28                |                            |         | 1 11       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 12 | Grate pg. 131: Provide summary of adv costs by campaign, cost type, RC and FCC acct and provide Partial C                                 |                            | Y 7/8   | 1 12       | 06/08/04 | 07/08/04 | 30       |
| UTI-1 1 13 | For each of the Company's dereg serv, provide IS and summary of investment  | C                          | Y       | 1 13       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 14 | What AZ LNP costs/rev were incurred/realized in test period? Provide armts by month and FCC acct  | Hardcopy Att               | Y       | 1 14       | 06/08/04 | 06/25/04 | 17       |
| UTI-1 1 15 | What AZ reciprocal camp costs/rev were incurred/realized in the test period? Provide armts by month and FCC acct                          |                            | Y 7/8   | 1 15       | 06/08/04 | 07/08/04 | 30       |
| UTI-1 1 16 | Provide copy of the internal documentation to inform external relations personnel of policy re: allocat C                                 |                            | Y       | 1 16       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 17 | Provide an org chart for the AZ Public Affairs org and written descriptions for each employee   | C                          | Y       | 1 17       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 18 | Provide an org chart for the AZ Community Relations org and written descriptions for each employee  |                            | Y       | 1 18       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 19 | Provide a summary of test period charges by RC, EXTC and FCC sub-acct for Acct 6722 External R C  |                            | Y       | 1 19       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 20 | Provide a copy of QCI and QSC accounting allocation manuals   | C                          | Y       | 1 20       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 21 | Provide statement of total QCI and QSC gross test year charges by RC, allocation of costs to QC vs C                                      |                            | Y       | 1 21       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 22 | List/describe each contract for recurring products/services between QC and affiliates   | Partial C                  | Y 7/8   | 1 22       | 06/08/04 | 07/08/04 | 30       |
| UTI-1 1 23 | Provide itemization of test period transactions between QC and each affiliate charged on QC books   | Supp 7/19, Att 7/20, Supp  | Y       | 1 23       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 24 | Provide statement of test period charges impacting QC expenses in AZ by cost type re: "Legal Proce C                                      |                            | Y       | 1 24       | 06/08/04 | 06/28/04 | 20       |
| UTI-1 1 25 | Has QC or affil initiated any business restructuring since January 2002?  | Fax copy                   |         | 1 25       | 06/08/04 | 09/18/04 | 100      |
| UTI-1 1 26 | Explain the process and vendors involved that relate to fees for re-auditing prior financial statements                                   | Partial C                  | Y       | 1 26       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 27 | Provide itemization of all acct restatement entries recorded in 02-03 by QC or any affiliate  | C, suppl 7/12/04           | Y       | 1 27       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 28 | Pg. 3 SEC Form S-4: Provide discussion and calc to explain how the debt of each entity is attributed to AZ intrastate ops                 |                            | Y       | 1 28       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 29 | Provide itemization of all forms of cash, deferred and non-cash comp provided to each of the ten mo C                                     |                            | Y       | 1 29       | 06/08/04 | 06/28/04 | 20       |
| UTI-1 1 30 | Provide itemization of all forms of cash, deferred and non-cash comp provided to each of the non-en Partial C                             |                            | Y       | 1 30       | 06/08/04 | 06/18/04 | 10       |
| UTI-1 1 31 | For each incen comp plan, provide listed info such as statement of costs  | C                          | Y       | 1 31       | 06/08/04 | 08/03/04 | 56       |
| UTI-2 2 1  | Provide electronic copy of the Qwest Corp chart of accounts with narrative description of sub-accounts                                    |                            | Y       | 2 1        | 06/11/04 | 06/28/04 | 17       |
| UTI-2 2 2  | Provide electronic copy of the Qwest Services Company chart of accounts with narrative description of sub-accounts                        |                            | Y       | 2 2        | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 3  | Grate pgs. 82-81: Provide a copy of excel files supportive of end of period annualization trend analysis C                                |                            | Y       | 2 3        | 06/11/04 | 06/28/04 | 17       |
| UTI-2 2 4  | Adjs PFN-2/PFN-4: Provide copies of QC compliance filings to confirm rev impacts associated with e Partial C                              |                            | Y       | 2 4        | 06/11/04 | 06/28/04 | 17       |
| UTI-2 2 5  | PFN-1: Provide copies of the out of period rev/exp entries ref in wp's that individually exceed a \$100, C, Supp 8/3 Revised A 8          |                            | Y       | 2 5        | 06/11/04 | 07/02/04 | 21       |
| UTI-2 2 6  | PFN-2/PFN-3: Explain whether or not the 36 months of rev data used to calculate inear regression w C No Hardcopy Att                      | cd only                    | Y       | 2 6        | 06/11/04 | 08/12/04 | 62       |
| UTI-2 2 7  | PFN-3: Explain why a "rate" change "driver" was recognized for state switched Inter.ATA excess  |                            | Y       | 2 7        | 06/11/04 | 06/28/04 | 17       |
| UTI-2 2 8  | PFN-6: Provide allocation pool and factor change data used to quantify changes to centralized allocation factors at year end              |                            | Y       | 2 8        | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 9  | PFN-8: Provide documentation used to derive the "Weighted Three" and "Access Lines" factors   | C                          | Y       | 2 9        | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 10 | PFN-9: Provide copies of monthly billings to QLDC for service order processing  | C, A if needed             | Y       | 2 10       | 06/11/04 | 06/28/04 | 17       |
| UTI-2 2 11 | PFN-9: Explain when/how the errors in allocation of call center costs was discovered, provide copies partial                              |                            | Y       | 2 11       | 06/11/04 | 07/12/04 | 31       |
| UTI-2 2 12 | PFR-2: Provide copies of reports submitted to ACC re: service quality performance during 2003   | Partial C                  | Y       | 2 12       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 13 | PFR-4: Confirm \$(32,169,000) CWC allowance inadvertently included the non-cash items   | C                          | Y       | 2 13       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 14 | Provide an electronic copy of all documents filed with ACC in connection with annual affiliated interest reporting                        |                            | Y       | 2 14       | 06/11/04 | 06/28/04 | 17       |
| UTI-2 2 15 | SEC Form S-4 pg. 23: State # of employees reduced in connection with each restructuring plan  | C Ref 1-5, No Hardcopy /   | cd only | 2 15       | 06/11/04 | 09/16/04 | 97       |
| UTI-2 2 16 | SEC Form S-4 pg. 23: Update disclosure with info about new restructuring/staffing adj as now exists                                       |                            | Y       | 2 16       | 06/11/04 | 07/19/04 | 38       |
| UTI-2 2 17 | SEC Form S-4 pg. 26: Provide copies of reports, etc. associated with ref "evaluation" to stop promoti C                                   | Hardcopy Att 8/13          | Y       | 2 17       | 06/11/04 | 08/12/04 | 62       |
| UTI-2 2 18 | Provide monthly breakdown of QC-AZ product-specific advertising exp by product line and campaign C, Supp 8/30                             |                            | Y       | 2 18       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 19 | Provide monthly breakdown of QC-AZ non-product-specific advertising exp by product line and camp; C, Supp 8/30                            |                            | Y       | 2 19       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 20 | SEC Form S-4 pg. 30: Describe "Spirit of Service" campaign and provide reports addressing purpose and value                               |                            | Y       | 2 20       | 06/11/04 | 07/12/04 | 31       |
| UTI-2 2 21 | SEC Form S-4 pg. 32: Provide copies of studies, etc. associated with ref impairment review  | C                          | Y       | 2 21       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 22 | Grate pg. 92 Exh PEG-D6 Emp levels: Provide copy of excel spreadsheet underlying PEG-D6   | Hardcopy Att 7/15          | Y       | 2 22       | 06/11/04 | 07/12/04 | 31       |
| UTI-2 2 23 | Provide copy of Company's monthly MR, FR and JD series expense matrix for AZ ops  | C                          | cd only | 2 23       | 06/11/04 | 07/12/04 | 31       |
| UTI-2 2 24 | Provide breakdown of monthly payroll exp between categories of reg, OT, Prem, Incent for AZ ops   | C                          | Y       | 2 24       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 25 | Does Qwest continue to prepare various income tax reports? If so, provide copies on MR & JD basis C                                       |                            | Y       | 2 25       | 06/11/04 | 07/09/04 | 28       |
| UTI-2 2 26 | Provide breakdown of monthly bal of each accum def income tax reserve acct by timing difference   | C a-d Rec'd 7/8            | Y       | 2 26       | 06/11/04 | 07/02/04 | 21       |
| UTI-2 2 27 | Sch B-1 & wps of PFA-1/PFN-11: Provide breakdown of \$4,863,469,000 of unadjusted gross intrastate PIS on Sch B-2                         |                            | Y       | 2 27       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 28 | Adj PFA-2 & wps of OPEB: Provide a copy of the current "OPEB Allocation Model"  | C a Rec'd 7/8              | Y       | 2 28       | 06/11/04 | 7/22/04  | 21       |
| UTI-2 2 29 | Adj PFA-8 & wps of Incent Comp: Provide supporting calcs to employ factor of ".1605"  | suppl 7/12, Hardcopy Att   | Y       | 2 29       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 30 | Adj PFA-10 & wps of Prop Tax: Provide copies of wp's supporting calc of pro forma prop tax exp of \$ C                                    |                            | Y       | 2 30       | 06/11/04 | 06/21/04 | 10       |
| UTI-2 2 31 | Adj PFA-2/PFR-5: Provide copy of each actuarial study now available showing allocation to AZ ops  | C                          | Y       | 2 31       | 06/11/04 | 06/28/04 | 17       |
| UTI-3 3 1  | PFA-02 wp Att B OPEB: Provide copy of the 12/31/03 "US WEST - REG" actuarial report supporting armts in Col A                             |                            | Y       | 3 1        | 06/22/04 | 07/02/04 | 10       |
| UTI-3 3 2  | PFA-02 wp Att D OPEB: Explain why both Qwest APBO armts for medical/life are identified as "estim C                                       | Hardcopy Att 7/15          | Y       | 3 2        | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 3  | PFA-02 wp Att D OPEB: Explain significant changes in calc of TBO armt armts from last rate proceeding                                     |                            | Y       | 3 3        | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 4  | Grate pg. 54, PFA-02 OPEB: Confirm in last case Redding sponsored Adj P-05 to recognize FAS106  |                            | Y       | 3 4        | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 5  | Grate pg. 111, PFR-05 Pen Asset: Confirm Co has not proposed any adj/acctg to amt of pension exp C  | Hardcopy Att 7/15          | Y       | 3 5        | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 6  | Grate pg. 111, PFR-05 Pen Asset: Does Co still consider info from responses UTI 20-005, 46-013S1 C  | Hardcopy Att 7/15          | Y       | 3 6        | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 7  | Grate pg. 111, PFR-05 Pen Asset: Does Co still consider info from responses UTI 20-005, 47-005 to be accurate from last case or necessa   |                            | Y       | 3 7        | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 8  | Grate pg. 111, PFR-05 Pen Asset: Does Co still consider info from responses UTI 20-005(d), 47-006 to be accurate from last case or neces  |                            | Y       | 3 8        | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 9  | Grate pg. 111, PFR-05 Pen Asset: Does Co still consider info from responses UTI 20-005, 47-006 to be accurate from last case or neces     |                            | Y       | 3 9        | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 10 | Grate pg. 111, PFR-05 Pen Asset: Does Co still consider info from responses UTI 13-12, 20-005(b), RUCO 28-003(c) to be accurate from last |                            | Y       | 3 10       | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 11 | Grate pgs. 113-114, PFR-05 Pen Asset: Provide accum def income tax reserve at 12/31/02-03 both: C   | Hardcopy Att 7/15          | Y       | 3 11       | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 12 | Grate pg. 111, PFR-05 Pen Asset: Is Qwest aware of Public Law No. 108-218? Does law apply to Qwest plans?                                 |                            | Y       | 3 12       | 06/22/04 | 07/12/04 | 20       |
| UTI-3 3 13 | Grate pg. 111, PFR-05 Pen Asset: Are changes enacted by Law No. 108-218 expected to impact peipartial O                                   |                            | Y       | 3 13       | 06/22/04 | 07/12/04 | 20       |

# EXHIBIT A

| DR No.     | DESCRIPTION  | CODE | Disc    | DR Set No. | DATE   |          | LAG DAYS |    |
|------------|--|------|---------|------------|--------|----------|----------|----|
|            |  |      |         |            | ISSUED | RECEIVED |          |    |
| UTI-3 3 14 | Grate pg. 54, PFA-02 OPEB: Provide amt of OPEB exp included in Qwest's unadjusted test year exp showing allocation                             |      |         |            | 3 14   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 15 | Grate pg. 54, PFA-02 OPEB: Provide copy of all correspondence between Qwest/actuary re: new pri C Hardcopy Att 7/15                            |      | Y       |            | 3 15   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 16 | RCND Comp Study Update PFN-07: Explain assumptions/provide calc for QWEST CORP ROR value C Hardcopy Att 7/15                                   |      | Y       |            | 3 16   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 17 | RCND Exh NNH-2 pg.12: Provide plant record listing of year/made/model of the approx \$1.1M of Passenger Cars                                   |      | Y 7/8   |            | 3 17   | 06/22/04 | 07/08/04 | 16 |
| UTI-3 3 18 | RCND Exh NNH-2 pg. 14: Provide plant record listing of year/made/model of the approx \$2.4m of Heavy Trucks                                    |      | Y 7/8   |            | 3 18   | 06/22/04 | 07/08/04 | 16 |
| UTI-3 3 19 | RCND Exh NNH-2 pg. 26: Provide plant record listing of assets by location for approx \$31.5m of GP Computers                                   |      | Y 7/8   |            | 3 19   | 06/22/04 | 07/08/04 | 16 |
| UTI-3 3 20 | RCND Exh NNH-2 pg. 55: Provide plant record listing by location for \$13.8m of Conduit Systems   |      | Y 7/8   |            | 3 20   | 06/22/04 | 07/08/04 | 16 |
| UTI-3 3 21 | Did Co receive any Federal or State universal service support funding in the test period?  |      |         |            | 3 21   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 22 | Has Co filed a lawsuit against AT&T in past year claiming they illegally avoided paying for use of Qw: C Hardcopy Att 7/15                     |      | Y       |            | 3 22   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 23 | Has Co recorded any SFAS 5 contingency accruals or accrual reversals that impact test period AZ in C, Att 7/20                                 |      | Y       |            | 3 23   | 06/22/04 | 07/19/04 | 27 |
| UTI-3 3 24 | Re: sale of Dex-Provide stmt of all exp incurred charged to AZ Intrastate op exp in test period by FCC acct                                    |      |         |            | 3 24   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 25 | Re: restruc corp debt-Provide stmt of all exp incurred charged to AZ Intrastate op exp in test period C a-7/8                                  |      | Y       |            | 3 25   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 26 | UTI 1-9 CAM: Explain how market pricing is determined to price services provided to QC C, Voluminous   |      | cd only |            | 3 26   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 27 | Provide copies of monthly invoices from Qwest Business Resources to QC for each month of 2003 C, Voluminous                                    |      | cd only |            | 3 27   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 28 | Provide copies of monthly invoices from Qwest Dex to QC for each month of 2003 and copies of true C Hardcopy Att 7/15, V                       |      | Y       |            | 3 28   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 29 | UTI 1-23 Att A: Explain/quantify effects of sale of Dex upon pre-divestiture affiliate transactions C, Supp 7/19 Att 7/20                      |      | Y       |            | 3 29   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 30 | Provide copies of monthly invoices from Qwest Services Corp to QC for each month of 2003 C Hardcopy Att 7/15, V                                |      | Y       |            | 3 30   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 31 | Provide copies of monthly invoices from Qwest Info Tech to QC for each month of 2003 C Hardcopy Att 7/15, V                                    |      | Y       |            | 3 31   | 06/22/04 | 07/12/04 | 20 |
| UTI-3 3 32 | UTI 1-23 Att A: Provide info for each type of service provided on recurring basis by QC to Qwest Inte C Partial O-R Hardcopy                   |      | Y       |            | 3 32   | 06/22/04 | 07/28/04 | 34 |
| UTI-3 3 33 | UTI 1-23 Att A: Provide info for each type of service provided on recurring basis by QC to Qwest Bro C Partial O-R Hardcopy                    |      | Y       |            | 3 33   | 06/22/04 | 07/28/04 | 36 |
| UTI-3 3 34 | UTI 1-23 Att A: Provide info for each type of service provided on recurring basis by QC to Qwest Info C Partial O-R Hardcopy                   |      | Y       |            | 3 34   | 06/22/04 | 08/03/04 | 42 |
| UTI-3 3 35 | UTI 1-23 Att A: Provide info for each type of service provided on recurring basis by QC to Qwest Ser C Partial O-R Hardcopy                    |      | Y       |            | 3 35   | 06/22/04 | 07/28/04 | 36 |
| UTI-3 3 36 | UTI 1-23 Att A: Provide info for each type of service provided on recurring basis by QC to Qwest WIn C Partial O-R Hardcopy                    |      | Y       |            | 3 36   | 06/22/04 | 08/03/04 | 42 |
| UTI-3 3 37 | Provide consolidating Qwest Comm International IS & BS for 03 A  |      |         |            | 3 37   | 06/22/04 | 09/16/04 | 86 |
| UTI-3 3 38 | Adj PFN-01 Out of Period: Provide detailed explanation for JE "Reverse December 2002 Standing Accruals for TN14P3000"                          |      |         |            | 3 38   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 39 | Adj PFN-01 Out of Period: Explain why July02 transactions were booked in Sept03 for "Sale of Land in Mesa, AZ"                                 |      |         |            | 3 39   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 40 | Adj PFN-01 Out of Period: Provide detailed explanation for JE "Accrue FY2002 Home Relocation Exp Incurred but not invoiced at 01-31-03"        |      |         |            | 3 40   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 41 | Adj PFN-01 Out of Period: Provide detailed explanation for JE "Reverse December 2003 Contract Labor Accrual"                                   |      |         |            | 3 41   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 42 | Adj PFN-01 Out of Period: Provide detailed explanation for JE "January 2004 Reversals of December 2003 Accruals for RCTU97"                    |      |         |            | 3 42   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 43 | Adj PFN-01 Out of Period: Provide detailed explanation for JE "January 2004 Reversals of December 2003 Accruals for RCTU97"                    |      |         |            | 3 43   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 44 | Adj PFN-01 Out of Period: Provide detailed explanation for JE "Reverse December 2003 Cable/Locate Contract Labor Accrual"                      |      |         |            | 3 44   | 06/22/04 | 07/02/04 | 10 |
| UTI-3 3 45 | Adj PFN-01 Out of Period: Provide detailed explanation for JE "Reversing JE 2002090000022097/20021000000022848"                                |      |         |            | 3 45   | 06/22/04 | 07/12/04 | 20 |
| UTI-4 4 1  | Grate pg. 57 PFA-03: Explain why Qwest is only now proposing to adopt SOP98-1 for AZ regulatory Att 7/20, Supp 7/26 Att A                      |      | Y       |            | 4 1    | 06/24/04 | 07/12/04 | 18 |
| UTI-4 4 2  | Grate pg. 57 PFA-03: Provide a general explanation of the purpose of the multiple "tabs" contained in UTI Printed Hardcopy, S                  |      | Y       |            | 4 2    | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 3  | UTI 1-13 FCC Dereg: Provide 03 test year data for each FCC deregulated service as originally requested   |      |         |            | 4 3    | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 4  | UTI 1-27 Restatement entries: Provide detailed explanation of each "issue" indicating the initial acctg problem and provide calc               |      |         |            | 4 4    | 06/24/04 | 07/12/04 | 18 |
| UTI-4 4 5  | UTI 2-24 Payroll: Do amts represent all wages/salaries directly incurred by and allocated to AZ? C Att 7/20                                    |      | Y       |            | 4 5    | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 6  | UTI 2-30 PropTax: Reconcile diff between "Actual NBV @ 12/31/03" and the "Reported NBV or Cost" C Hardcopy Att 7/15                            |      | Y       |            | 4 6    | 06/24/04 | 07/12/04 | 18 |
| UTI-4 4 7  | UTI 2-30 PropTax: Provide copy of correspondence from AZ DOR communicating its findings re: fns C, Supp 7/19, Att 7/20 Att                     |      | Y       |            | 4 7    | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 8  | Grate pg. 74 PFN-01: Did Co review the tax exp accrual entries in 03/04 to determine if separate correcting/true-up entries had been record    |      |         |            | 4 8    | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 9  | UTI 1-17/1-18 Public Affairs: Confirm that Qwest has no "written position descriptions in as much det C Hardcopy Att 7/15                      |      | Y       |            | 4 9    | 06/24/04 | 07/12/04 | 18 |
| UTI-4 4 10 | For each subsidiary of QCIL, provide mgmt org chart indicating the officers and senior mgmt of each org  |      | Y       |            | 4 10   | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 11 | For QSC Regulatory and Public Policy org, provide mgmt chart and written description for each 5 mos C Hardcopy Att 7/15                        |      | Y       |            | 4 11   | 06/24/04 | 07/12/04 | 18 |
| UTI-4 4 12 | UTI 2-18/2-19 AdExp: Provide copies of representative advertising copy Att 7/20  |      | Y       |            | 4 12   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 13 | CWC PFR-04 wps pg. 1: Confirm that the Co asserted lead lag study inc stml amts are based upon unadjusted JR basis test period rev/exp         |      |         |            | 4 13   | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 14 | CWC PFR-04 ws 11,13,21,24: Explain recent revisions made to calc of salary amts in lead lag study exp weighting values                         |      |         |            | 4 14   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 15 | CWC PFR-04 ws 15: Provide a copy of most recent invoice and pmt records associated w/ AZ PUC assessment  |      |         |            | 4 15   | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 16 | CWC PFR-04 ws 20: Explain Co acctg for Federal Excise Tax, basis for assessment and calc of tax  |      |         |            | 4 16   | 06/24/04 | 07/12/04 | 18 |
| UTI-4 4 17 | CWC PFR-04 ws 21: Explain Co acctg for Sales Tax, basis for assessment and calc of tax   |      |         |            | 4 17   | 06/24/04 | 07/12/04 | 18 |
| UTI-4 4 18 | CWC PFR-04 ws 24: Provide supporting workpapers for Co asserted "Salary Only" lag day value  |      |         |            | 4 18   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 19 | CWC PFR-04 ws 24: Provide supporting workpapers for Co asserted "Accrued Compensated Absences" lag day value                                   |      |         |            | 4 19   | 06/24/04 | 08/02/04 | 39 |
| UTI-4 4 20 | CWC PFR-04 ws 25: Provide supporting workpapers for Co asserted zero lag day value assigned to C Att 7/20                                      |      | Y       |            | 4 20   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 21 | CWC PFR-04 ws 26: Provide supporting workpapers for Co asserted "Direct Rent" lag day value A  |      | Y       |            | 4 21   | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 22 | CWC PFR-04 ws 27: Provide supporting workpapers for Co asserted "Miscellaneous Vouchers" lag C A   |      | Y       |            | 4 22   | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 23 | PFR-08 Cust Dep: Explain whether any Customer Deposits were collected pursuant to interstate tariffs   |      |         |            | 4 23   | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 24 | UTI 1-26 Re-audit costs: Does Co believe these costs should remain in test period normalized expenses  |      |         |            | 4 24   | 06/24/04 | 07/06/04 | 12 |
| UTI-4 4 25 | UTI 1-11b Shareholder Lawsuit costs: State whether test year includes any costs of the type disallowed in prior cases                          |      |         |            | 4 25   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 26 | UTI 1-11c Merger/Acquis cost: State whether test year includes any costs of the type disallowed in prior case                                  |      |         |            | 4 26   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 27 | UTI 1-11d Strategic Plan cost: State whether test year includes any costs of the type disallowed in prior case                                 |      |         |            | 4 27   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 28 | UTI 1-11e Cash mgmt cost: State whether test year includes any costs of the type disallowed in prior C Att 7/20                                |      | Y       |            | 4 28   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 29 | UTI 1-11(f) Image Ad cost: State whether test year includes any costs of the type disallowed in prior C Hardcopy Att 8/4                       |      | Y       |            | 4 29   | 06/24/04 | 08/02/04 | 39 |
| UTI-4 4 30 | Has Co conducted any studies of effectiveness of its non-product specific ad/mktg programs since 1-1-03?                                       |      |         |            | 4 30   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 31 | For each affiliate that bills QC on an est basis with periodic true-up calc/billings, provide calc of acur C Att 7/20                          |      | Y       |            | 4 31   | 06/24/04 | 07/19/04 | 25 |
| UTI-4 4 32 | Identify/describe each significant change in scope or pricing of services being provided to each listed C Hardcopy Att 8/4                     |      | Y       |            | 4 32   | 06/24/04 | 08/02/04 | 39 |
| UTI-4 4 33 | Identify/describe each significant change in scope or pricing of services being provided to each listed C Hardcopy Att 8/11 Sup                |      | Y       |            | 4 33   | 06/24/04 | 08/06/04 | 43 |
| UTI-5 5 1  | UTI 2-4 Att B, 2-7: Explain why trending approach with a rate per MOU "driver" is thought to produce C Att 7/21                                |      | Y       |            | 5 1    | 07/08/04 | 07/20/04 | 12 |
| UTI-5 5 2  | UTI 2-7: Explain known reasons why the MOU rate is expected to continue to decline and provide co C Att 7/21                                   |      | Y       |            | 5 2    | 07/08/04 | 07/20/04 | 12 |
| UTI-5 5 3  | Provide details associated with each intrastate access tariff price adj impacting the effective rate per Ref RUCO 2-23, UTI 5-2                |      |         |            | 5 3    | 07/08/04 | 07/26/04 | 18 |
| UTI-5 5 4  | Has Qwest in 03/04 provided free or discounted AZ retail intrastate telecommunications services to any customer at terms not generally av      |      |         |            | 5 4    | 07/08/04 | 07/28/04 | 20 |
| UTI-5 5 5  | Identify each corporate entity involved in the provision of DSL services in AZ   |      |         |            | 5 5    | 07/08/04 | 08/05/04 | 28 |
| UTI-5 5 6  | UTI 4-24: Provide info comparing QC professional fees incurred in 01/02 to the test period and to "h O-R, C Att 7/21                           |      | Y       |            | 5 6    | 07/08/04 | 07/20/04 | 12 |
| UTI-5 5 7  | UTI 4-23: Provide copies of the relevant excerpts within the referenced ACC Decisions re: Customer deposits                                    |      |         |            | 5 7    | 07/08/04 | 07/19/04 | 11 |
| UTI-5 5 8  | UTI 3-17, 3-18, 3-19, 3-20: Explain how simply providing a list is thought to be demonstrative of the fact that each asset is still in service |      |         |            | 5 8    | 07/08/04 | 08/20/04 | 43 |
| UTI-5 5 9  | UTI 3-29: Explain whether any further ratemaking adj is necessary to reflect the change in exp previo C Att 7/20                               |      | Y       |            | 5 9    | 07/08/04 | 07/19/04 | 11 |
| UTI-5 5 10 | Provide a breakdown of monthly AZ M&S investment balances by category and store/mo location Hardcopy Att 8/30                                  |      | Y       |            | 5 10   | 07/08/04 | 08/27/04 | 50 |
| UTI-5 5 11 | Describe procedures employed by Co to periodically conduct physical inventories to verify materials Hardcopy Att 8/30                          |      | Y       |            | 5 11   | 07/08/04 | 08/30/04 | 53 |
| UTI-5 5 12 | Explain causes for the steadily declining trend in AZ customer deposits balance since Jan 01 Partial C Hardcopy Att 7/                         |      | Y       |            | 5 12   | 07/08/04 | 07/28/04 | 20 |
| UTI-5 5 13 | UTI 1-20 Att A: Provide for each affiliate the Hyperion statistical/financial data and calcs performed t C, A, Att 7/21, Supp 7/26             |      | Y       |            | 5 13   | 07/08/04 | 07/20/04 | 12 |
| UTI-5 5 14 | UTI 1-20 Att A: List/describe each of the "Flow-through RC's" that resulted in charges to QC for the t Att 7/21                                |      | Y       |            | 5 14   | 07/08/04 | 07/20/04 | 12 |
| UTI-5 5 15 | UTI 1-20 Att A: List/describe each of the "Unallocated RC's" that resulted in incurred costs at QSC for C Att 7/21                             |      | Y       |            | 5 15   | 07/08/04 | 07/20/04 | 12 |
| UTI-5 5 16 | Provide a detailed stand-alone income statement for QSC for 2003 indicating monthly/annual total re C Att 7/20                                 |      | Y       |            | 5 16   | 07/08/04 | 07/19/04 | 11 |
| UTI-5 5 17 | Explain/document the process through which QSC overhead/indirect costs are accumulated and allo C Hardcopy Att 7/28                            |      | Y       |            | 5 17   | 07/08/04 | 07/26/04 | 18 |
| UTI-5 5 18 | Have any internal/external audits been conducted re: acctg for and allocation of QSC affiliates' costs s Att 7/20                              |      | Y       |            | 5 18   | 07/08/04 | 07/19/04 | 11 |
| UTI-5 5 19 | UTI 1-22 Att A: Provide copies of all affiliate contracts with listed entities that were effective during t C, V                               |      | cd only |            | 5 19   | 07/08/04 | 07/20/04 | 12 |
| UTI-6 6 1  | UTI 2-5 Att A, 3-21: Explain inconsistency in responses and quantify any USF receipts attributable to V  |      | cd only |            | 6 1    | 07/16/04 | 08/02/04 | 17 |
| UTI-6 6 2  | UTI 2-5 Att A: Explain the selection process employed and provide info to reconcile 2-5 Att A to PFN Ref 2-5                                   |      |         |            | 6 2    | 07/16/04 | 08/02/04 | 17 |
| UTI-6 6 3  | Provide description of QCIL's retail product marketing strategy in AZ Hardcopy Att 8/30  |      | Y       |            | 6 3    | 07/16/04 | 08/27/04 | 42 |
| UTI-6 6 4  | UTI 2-1 Att A: Provide a QC responsibility code hierarchy table indicating dept/report structure relatio V cd only                             |      | Y       |            | 6 4    | 07/16/04 | 08/27/04 | 42 |
| UTI-6 6 5  | Local_Recur.xls: Provide documentation supporting Corp.Jml Activity 2 entry to Acct. 5001.11 for (\$2 Hardcopy Att 7/28                        |      | Y       |            | 6 5    | 07/16/04 | 07/26/04 | 10 |
| UTI-6 6 6  | Local_Recur.xls: Provide documentation supporting BARTONL Activity 390 entry to Acct. 5060.121 f Hardcopy Att 7/28                             |      | Y       |            | 6 6    | 07/16/04 | 07/26/04 | 10 |
| UTI-6 6 7  | UTI 2-7, Access_Rev.xls: Provide supporting documentation for the monthly "Billed MOU" and "Billed Ref 5-2                                     |      | Y       |            | 6 7    | 07/16/04 | 08/27/04 | 42 |
| UTI-6 6 8  | UTI 4-9 Att A: For each position listed in Pub Affairs Org, provide test year wage and benefits cost dist data among FCC Accts                 |      |         |            | 6 8    | 07/16/04 | 08/02/04 | 20 |
| UTI-6 6 9  | UTI 4-11 Att A: For listed positions with Qwest Services Pub Pol Org, provide test year wage and bei C Hardcopy Att 8/4                        |      | Y       |            | 6 9    | 07/16/04 | 08/02/04 | 17 |

# EXHIBIT A

| DR No.     | DESCRIPTION   | CODE  | Disc      | DR Set No. | DATE   |          | LAG DAYS |    |
|------------|---|---|-----------|------------|--------|----------|----------|----|
|            |   |   |           |            | ISSUED | RECEIVED |          |    |
| UTI-6 6 10 | UTI 4-11 Att A: For listed positions with Qwest Services Pub Pol Org, provide copies of times studies   |   |           | 6          | 10     | 07/16/04 | 08/05/04 | 20 |
| UTI-6 6 11 | Does the Qwest Public Policy Org prepare in the prep of strategic plans that are submitted for review by senior mgmt of consolidated busin      |   |           | 6          | 11     | 07/16/04 | 07/26/04 | 10 |
| UTI-6 6 12 | UTI 3-22 Att A,B,C: Confirm test period AZ intrastate access rev from serv to AT&T reflect as-billed amts that are believed by the Co to be i   |   |           | 6          | 12     | 07/16/04 | 08/27/04 | 42 |
| UTI-6 6 13 | UTI 3-22 Att A,B,C: Provide est of test period costs incurred in connection with investigation of claims & litigation against AT&T              |   |           | 6          | 13     | 07/16/04 |          | 0  |
| UTI-6 6 14 | UTI 2-20: Explain purpose for the "Spirit of Service" campaign  |   |           | 6          | 14     | 07/16/04 |          | 0  |
| UTI-6 6 15 | UTI 2-20: Admit Qwest has no record of its exp associated w/ develop/placement of "Spirit of Service" campaign ads                              |   |           | 6          | 15     | 07/16/04 | 09/13/04 | 59 |
| UTI-6 6 16 | Does QC or affil track costs of ad by campaign or other project/product category?   | O-R   |           | 6          | 16     | 07/16/04 | 08/09/04 | 24 |
| UTI-6 6 17 | UTI 3-28 Att B: Provide comparable monthly charges to AZ intrastate exp from Dex under new owner Ref UTI 5-9                                    |   |           | 6          | 17     | 07/16/04 | 07/23/04 | 10 |
| UTI-7 7 1  | UTI 5-13 Att B: Provide comparable information for all months of 2001, 2002 and all available subsec C Hardcopy Att 8/11                        |   | Y         | 7          | 1      | 08/03/04 | 08/06/04 | 3  |
| UTI-7 7 2  | UTI 4-31: State when Qwest intends to submit the "supplemental rule 103 filing" ref in response and describe each change                        |   | no attach | 7          | 2      | 08/03/04 | 09/17/04 | 45 |
| UTI-7 7 3  | UTI 3-31: Explain the process in which Qwest Corp manages/controls relationship w/ exp made to its Qwest Info Tech affiliate                    |   |           | 7          | 3      | 08/03/04 |          | 0  |
| UTI-7 7 4  | UTI 4-12 Att A: Provide a summary of Qwest advertising by campaign/message during the test perio  | O   |           | 7          | 4      | 08/03/04 | 08/08/04 | 6  |
| UTI-7 7 5  | UTI 3-31 Att F: Explain how the QIT unit billing rates are determined and describe when adj are calcd C No Hardcopy Att                         |   | cd only   | 7          | 5      | 08/03/04 | 08/20/04 | 17 |
| UTI-7 7 6  | UTI 3-31 Att B: Provide additional QIT invoice support illustrating monthly quantities and prices being billed and itemizing the "Conduit" char |   |           | 7          | 6      | 08/03/04 |          | 0  |
| UTI-7 7 7  | UTI 5-1, 5-2 Att A: Provide copies of the IABS G8 report of AZ access billed minutes & \$   | C Hardcopy Att 8/13                                       |           | 7          | 7      | 08/03/04 | 08/12/04 | 8  |
| UTI-7 7 8  | UTI 5-17: Provide supporting documents for the "ROI calculation" for each month of the test period f  | C No Hardcopy Att   |           | 7          | 8      | 08/03/04 | 08/20/04 | 17 |
| UTI-7 7 9  | Did any Qwest affiliates other than QSC charge a calculated ROI for their allocated charges to QC du  | C No Hardcopy Att   |           | 7          | 9      | 08/03/04 | 08/23/04 | 20 |
| UTI-7 7 10 | UTI 3-26 Wireless pricing to QC: Explain why QC appears to pay a higher calculated effective rate p   | No Hard Copy Att  |           | 7          | 10     | 08/03/04 | 09/17/04 | 45 |
| UTI-7 7 11 | UTI 3-26 Wireless pricing to QC: Provide a calc of AZ ratemaking adj that would be required to re-pri   | C No Hardcopy Att   |           | 7          | 11     | 08/03/04 | 09/17/04 | 45 |
| UTI-7 7 12 | UTI 1-23S1Rec for Qwest WL B&C: Provide detailed billing stmts to Qwest Wireless for the monthly  | C No Hardcopy Att   |           | 7          | 12     | 08/03/04 | 08/23/04 | 20 |
| UTI-7 7 13 | UTI 1-23S1Rec for Qwest NW Serv: Provide billing stmts to Qwest Wireless for the "network service   | C Hardcopy Att 9/15                                       |           | 7          | 13     | 08/03/04 | 09/10/04 | 38 |
| UTI-7 7 14 | List/describe the b&c services provided to each QC affiliate  | C Hardcopy Att 8/13                                       |           | 7          | 14     | 08/03/04 | 08/12/04 | 9  |
| UTI-7 7 15 | Explain Co proposed treatment of b&c service rev/exp/invest in determining AZ rev require   | C No Hardcopy Att   |           | 7          | 15     | 08/03/04 | 08/20/04 | 17 |
| UTI-7 7 16 | UTI 3-23 Att A: Confirm that Qwest is not seeking rate recovery of the unsupported contingency accrual  | amts  |           | 7          | 16     | 08/03/04 |          | 0  |
| UTI-7 7 17 | UTI 5-7: Did Co allocate customer deposits 100% to intrastate in prior AZ rate cases?   | Hardcopy Att 8/31   |           | 7          | 17     | 08/03/04 | 08/30/04 | 27 |
| UTI-7 7 18 | UTI 5-6 Att A: Provide itemization by payee and QSC cost type for the 48E Contracted Services USV   | C Hardcopy Att 8/31                                       |           | 7          | 18     | 08/03/04 | 08/30/04 | 27 |
| UTI-7 7 19 | UTI 5-6 Att A: Explain/provide copy of the CY1 corp entries in Dec 01 totaling \$4,268,035 AZ share   | V cd only   |           | 7          | 19     | 08/03/04 | 08/30/04 | 27 |
| UTI-7 7 20 | UTI 3-26: Explain Qwest's acquisition of leased fiber lines, internal communications services obtained from QCC                                 |   |           | 7          | 20     | 08/03/04 | 08/27/04 | 25 |
| UTI-8 8 1  | UTI 3-27 Att A: Explain why Business Resources billings to QC for Tusconvest-333 Wetmore, Phoe  | C Hardcopy Att 9/15                                       |           | 8          | 1      | 08/06/04 | 09/10/04 | 34 |
| UTI-8 8 2  | UTI 3-27 Att A: Explain the basis of pricing for BRI office space and furniture occupied by QC  | employ C Hardcopy Att 9/15                                |           | 8          | 2      | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 3  | UTI 1-29 Att A: State whether any timesheets are maintained to attribute the "Total Comp" amts  | shown in column (a)                                       |           | 8          | 3      | 08/06/04 |          | 0  |
| UTI-8 8 4  | UTI 1-29 Att A: For each listed officer, provide copies of their exp reimbursement acts and   | supporting documents                                      |           | 8          | 4      | 08/06/04 |          | 0  |
| UTI-8 8 5  | Describe corporate aircraft and flight operations activities  |   |           | 8          | 5      | 08/06/04 | 08/23/04 | 17 |
| UTI-8 8 6  | UTI 5-16 Att A 700170 Qwest Corporate Aircraft Use: Provide itemization of the incurred costs   | by i C Hardcopy Att 8/31                                  |           | 8          | 6      | 08/06/04 | 08/30/04 | 24 |
| UTI-8 8 7  | UTI 5-16 Att A 601008 Mgmt Separation Plan: Provide description of the "Plan(s)" that contribute  | to C, V   |           | 8          | 7      | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 8  | UTI 5-16 Att A 606080 Exec Parks: Provide itemization of the incurred costs by type of perquisi   | te an C Hardcopy Att 9/15                                 |           | 8          | 8      | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 9  | UTI 5-16 Att A 630000 Sales Commissions: Provide itemization of the incurred costs by type  | of Cor Ref 8-7  |           | 8          | 9      | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 10 | UTI 5-16 Att A 630050 Distributor: Provide itemization of the incurred costs by type of payment   | Ref 8-7   |           | 8          | 10     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 11 | UTI 5-16 Att A 701000 Entertainment: Provide itemization of the incurred costs by type of payment   | Ref 8-7   |           | 8          | 11     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 12 | UTI 5-16 Att A 710210 Marketing Services: Provide itemization of the incurred costs by type   | of pay Ref 8-7  |           | 8          | 12     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 13 | UTI 5-16 Att A 720020 Claims and Losses Exp: Provide itemization of the transactions recorded   | in Ref 8-7  |           | 8          | 13     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 14 | UTI 5-16 Att A 740000 Consulting Fees: Provide itemization of the incurred costs by payee   | Ref 8-8, 8-7  |           | 8          | 14     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 15 | UTI 5-16 Att A 741000 Outside Professional: Provide itemization of incurred costs by payee  | Ref 8-8, 8-7  |           | 8          | 15     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 16 | UTI 5-16 Att A 741055 Prof Fees Miscellaneous: Provide itemization of the incurred costs  | by payee Ref 8-8, 8-7                                     |           | 8          | 16     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 17 | UTI 5-16 Att A 760005 Legal Damages and Settlements: Provide itemization of the transactions  | rec Ref 8-7   |           | 8          | 17     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 18 | UTI 5-16 Att A 770030 Memberships: Provide itemization of the incurred costs by payee   | Ref 8-8, 8-7  |           | 8          | 18     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 19 | UTI 5-16 Att A 800030 Event Sponsorship: Provide itemization of the incurred costs by type  | of expc C Hardcopy Att 9/15, Ref                          | Y         | 8          | 19     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 20 | UTI 5-16 Att A 800040 Events: Provide itemization of the incurred costs by type of expenditure  | and l Ref 8-19, 8-7, 8-8                                  |           | 8          | 20     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 21 | UTI 5-16 Att A 800070 Sponsorship Operating Expenses: Provide itemization of the incurred   | costs Ref 8-19, 8-7, 8-8                                  |           | 8          | 21     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 22 | UTI 5-16 Att A 800050/800051 Promotions/Trinkets and Promotional Materials: Provide descrip   | Ref 8-19, 8-7, 8-8  |           | 8          | 22     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 23 | UTI 5-16 Att A 800110 Market Research: Provide itemization of the incurred costs by type  | of expenc Ref 8-19, 8-7, 8-8                              |           | 8          | 23     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 24 | UTI 5-16 Att A 803410 Agency Fees: Provide itemization of the incurred costs by type of   | expenditur Ref 8-19, 8-7, 8-8                             |           | 8          | 24     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 25 | UTI 5-16 Att A 810000 Contributions/Donations: Provide itemization of the incurred costs  | by type o C, Hardcopy Att 9/15                            | Y         | 8          | 25     | 08/06/04 | 09/13/04 | 38 |
| UTI-8 8 26 | UTI 5-16 Att A 810001 Contributions Political: Provide itemization of the incurred costs  | by type of ex Ref 8-19, 8-7                               |           | 8          | 26     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 27 | UTI 5-16 Att A 810002 Contributions Events: Provide itemization of the incurred costs   | by type of ex Ref 8-25                                    |           | 8          | 27     | 08/06/04 | 09/13/04 | 38 |
| UTI-8 8 28 | UTI 5-16 Att A 880050 Qwest Insurance: Provide itemization of the incurred costs by type  | of insurar Ref 8-19, 8-7                                  |           | 8          | 28     | 08/06/04 | 09/10/04 | 35 |
| UTI-8 8 29 | UTI 5-16 Att A 940000 Other Income: Provide itemization of the transactions/categories of   | income recorded   |           | 8          | 29     | 08/06/04 | 08/18/04 | 12 |
| UTI-8 8 30 | UTI 5-16 Att A 940200 Gain on Sale of Company: Provide itemization of transactions recorded   |   |           | 8          | 30     | 08/06/04 | 08/18/04 | 12 |
| UTI-8 8 31 | UTI 2-18,2-19,5-16 Att A 800000-800021 Advertising: Provide recon of charges on QSC   | books into C, Missing Att B & C                           | Y         | 8          | 31     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 32 | UTI 4-29 Att A: Provide breakdown of the 48E Contracted Svcs-QSC Headquarters amount  | shown p Ref 8-31  |           | 8          | 32     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 33 | UTI 3-34: Explain the basis of pricing for QC office space and furniture "assigned to QIT"  | and provid C, V   |           | 8          | 33     | 08/06/04 | 09/17/04 | 42 |
| UTI-8 8 34 | UTI 3-34 f&g: Explain/provide supporting documentation for increased level of wholesale   | operator services revenue                                 |           | 8          | 34     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 35 | UTI 3-34 g: Explain/provide supporting documentation for increased level of Marketing and   | Sales Services revenues                                   |           | 8          | 35     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 36 | UTI 1-31 Incent comp: Do the plans identified as the "Bonus Plan" and the "Bonus Award"   | represent the different names for the same plan           |           | 8          | 36     | 08/06/04 | 09/03/04 | 28 |
| UTI-8 8 37 | UTI 4-5 Payroll: Confirm whether the ref to "expenditure codes" is equivalent to "EXTC"   | as listed in the response to UTI 2-1 Att A                |           | 8          | 37     | 08/06/04 | 08/20/04 | 14 |
| UTI-8 8 38 | UTI 4-5 Payroll: Explain why Qwest paid no bonus awards in 2002 and provide a copy of   | any related documentation                                 |           | 8          | 38     | 08/06/04 |          | 0  |
| UTI-8 8 39 | UTI 4-5 Payroll: Provide a copy of SAB 101 and any correspondence between the Co and  | the SEC regarding this bulletin                           |           | 8          | 39     | 08/06/04 |          | 0  |
| UTI-8 8 40 | UTI 4-5 Payroll: Explain why the expense amortization is offset by recording revenues   |   |           | 8          | 40     | 08/06/04 | 09/16/04 | 41 |
| UTI-8 8 41 | UTI 1-6S1 Headcounts: Explain the process used to determine equivalent headcounts   | C Hardcopy Att 8/31                                       |           | 8          | 41     | 08/06/04 | 08/30/04 | 24 |
| UTI-8 8 42 | Grate pg. 92 UTI 2-22 Headcounts: Was Co surprised/alarmed by the low coefficient   | produced by tht Hardcopy Att 8/31                         | Y         | 8          | 42     | 08/06/04 | 08/30/04 | 24 |
| UTI-8 8 43 | UTI 1-9 CAM: Has FCC CAM been redacted or had data removed from official CAM  | filed with the FCC?                                       |           | 8          | 43     | 08/06/04 | 08/20/04 | 14 |
| UTI-8 8 44 | UTI 5-13S1 Att B: Provide an est of the total QSC \$ that were allocated among affiliates   | based upon C No Hardcopy Att                              |           | 8          | 44     | 08/06/04 | 08/20/04 | 14 |
| UTI-8 8 45 | UTI 5-13S1 Att B: Explain/quantify each of the adjs applied to the raw fin/stat data  | used to determine C Hardcopy Att 9/15                     | Y         | 8          | 45     | 08/06/04 | 09/13/04 | 38 |
| UTI-8 8 46 | UTI 5-13S1 Att B: Provide a side by side comparison of each of the QSC relative-size-   | based allocati C No Hardcopy Att                          |           | 8          | 46     | 08/06/04 | 09/16/04 | 41 |
| UTI-8 8 47 | UTI 4-32 Att B: Explain procedures employed and provide calc for each listed "2003 &  | 2004 Billing R C No Hardcopy Att                          |           | 8          | 47     | 08/06/04 | 08/30/04 | 24 |
| UTI-8 8 48 | Explain treatment of listed types of costs such as "regular wage costs"   |   |           | 8          | 48     | 08/06/04 | 08/30/04 | 24 |
| UTI-8 8 49 | UTI 1-21 Att B: Provide for each QSC line item with charges in "AZ Intrastate FCC Reg"  | Col > \$50.0(Ref 2-2, 1-20                                |           | 8          | 49     | 08/06/04 | 08/30/04 | 24 |
| UTI-8 8 50 | UTI 1-21 Att B: Provide revised electronic spreadsheet indicating for each QSC line   | item listed inform No Hardcopy Att                        |           | 8          | 50     | 08/06/04 | 09/03/04 | 28 |
| UTI-9 9 1  | UTI 4-8 Prop Tax: Explain the reference to "Current estimate of taxes" related to 04  | valuation   |           | 9          | 1      | 08/11/04 | 08/23/04 | 12 |
| UTI-9 9 2  | UTI 1-31 Incent Comp: Did the Co record any incentive plan accrual entries in 2002?   | Any true-up entries in 2003?                              |           | 9          | 2      | 08/11/04 |          | 0  |
| UTI-9 9 3  | UTI 1-31 Incent Comp: Provide amt of Qwest Corp monthly incent plan costs directly  | assigned/allocated to AZ intrastate                       |           | 9          | 3      | 08/11/04 |          | 0  |
| UTI-9 9 4  | UTI 2-24/4-5 Payroll: Clarify if both versions include "direct to state and any headquarter   | or centralize C Hardcopy Att 9/15                         | Y         | 9          | 4      | 08/11/04 | 09/10/04 | 30 |
| UTI-9 9 5  | UTI 1-13/Interface -1990 Dereg-B&C: Explain why total of FCC dereg products in 1-13   | do not tie to l( Hardcopy Att 9/1                         | Y         | 9          | 5      | 08/11/04 | 09/01/04 | 21 |
| UTI-9 9 6  | UTI 1-13 FCC Dereg: Jan 01-Dec03 Did Co revise the prices charged for its individual  | FCC deregula C No Hardcopy Att                            |           | 9          | 6      | 08/11/04 | 09/16/04 | 36 |
| UTI-9 9 7  | UTI 1-13 FCC Dereg: During 2004, Has the Co revised the prices charged for its  | individual FCC dere C Ref 9-6 No Hardcopy A               |           | 9          | 7      | 08/11/04 | 09/16/04 | 36 |
| UTI-9 9 8  | UTI 1-9/1-13 FCC Dereg: "Pricing for Enhanced Services" - Identify each nonreg  | service included i Hardcopy Att 9/15                      | Y         | 9          | 8      | 08/11/04 | 09/13/04 | 33 |
| UTI-9 9 9  | UTI 1-9/1-13 FCC Dereg: Identify/describe Co plans to improve the fin results of any  | FCC dere serv O-R C No Hardcopy Att                       |           | 9          | 9      | 08/11/04 | 09/16/04 | 36 |
| UTI-9 9 10 | UTI 3-36 B&C to QW: Explain whether or not the "Ad Rev" in Acct. 5270 were normalized   | for price changes such a new contract with QW             |           | 9          | 10     | 08/11/04 |          | 0  |
| UTI-9 9 11 | UTI 4-9/6-8 AZ Pub Affairs Personnel: For each position, provide number of hours  | and related wage/benefit \$ charged                       |           | 9          | 11     | 08/11/04 |          | 0  |
| UTI-9 9 12 | UTI 6-16/7-4 Ad Cost: State with specificity how Qwest Services Corp does track   | and manage advertising costs                              |           | 9          | 12     | 08/11/04 |          | 0  |
| UTI-9 9 13 | Identify/describe each of the local/statewide events planned, funded and  | coordinated by Qwest or AZ O-R                            |           | 9          | 13     | 08/11/04 | 09/10/04 | 30 |
| UTI-9 9 14 | Does Co maintain any records associated w/ leg activities, its assessment of pending  | legislation or position on legislative matters at the Sta |           | 9          | 14     | 08/11/04 |          | 0  |
| UTI-9 9 15 | Does Co maintain any records associated w/ leg activities, its assessment of pending  | legislation or position on legislative matters at the Fec |           | 9          | 15     | 08/11/04 |          | 0  |

# EXHIBIT A

| DR No.       | DESCRIPTION   | CODE              | Disc    | DR Set | DR No. | DATE     |          | LAG DAYS |
|--------------|---|-------------------|---------|--------|--------|----------|----------|----------|
|              |   |                   |         |        |        | ISSUED   | RECEIVED |          |
| UTI-9 9 16   | Grate pg. 130/UTI 1-13 FCC Dereg: Provide a listing of each FCC Dereg service offered in AZ   | No Hardcopy Att   | cd only | 9      | 16     | 08/11/04 | 09/16/04 | 36       |
| UTI-9 9 17   | Grate pg. 130/UTI 1-13 FCC Dereg: Subsequent to 93 case, has Co petitioned the Comm to address how to handle services dereg by FCC          |                   |         | 9      | 17     | 08/11/04 | 09/01/04 | 21       |
| UTI-9 9 18   | Grate pg. 131 FCC Dereg: Was it his intent to express his opinions or should testimony be construed as legal opinion?                       |                   |         | 9      | 18     | 08/11/04 | 09/01/04 | 21       |
| UTI-9 9 19   | UTI 5-4 Contract Dispute: Describe status of Chandler and Scottsdale contract disputes  |                   |         | 9      | 19     | 08/11/04 |          | 0        |
| UTI-9 9 20   | August 6 Dow Jones new release: Explain tax strategy at issue and quantify the recorded tax benefits recorded initially then reversed       |                   |         | 9      | 20     | 08/11/04 |          | 0        |
| UTI-10 10 1  | UTI 4-18 Salary lag: State the approx % of pr disbursements that are direct deposit for employees such that disbursement float is zero      |                   |         | 10     | 1      | 08/11/04 |          | 0        |
| UTI-10 10 2  | UTI 4-15 ACC Assessment: Provide a breakdown of this amount by FCC Sub-act for 2002   | C No Hardcopy Att | cd only | 10     | 2      | 08/11/04 | 08/20/04 | 9        |
| UTI-10 10 3  | Explain which if any of the 3 AZ Price Cap rev "baskets" include FCC dereg service volumes and rev No Hardcopy Att                          |                   | cd only | 10     | 3      | 08/11/04 | 08/23/04 | 12       |
| UTI-10 10 4  | Explain Qwest's actions to establish a TSP program for ensuring telecom lines critical for nation's ho C Hardcopy Att 9/1                   |                   | Y       | 10     | 4      | 08/11/04 | 09/01/04 | 21       |
| UTI-10 10 5  | UTI 4-20 Benefits Lag: Provide a further breakdown of the \$258,376,422 amount on lead lag worksheet 25 for insurance costs among vario     |                   |         | 10     | 5      | 08/11/04 |          | 0        |
| UTI-10 10 6  | Provide most current analysis of benefit lag days from FCC lead lag studies   |                   |         | 10     | 6      | 08/11/04 | 09/03/04 | 23       |
| UTI-10 10 7  | UTI 4-33 c QSC Billings: Provide copies of analyses used to identify the noted changes in QSC expense levels                                |                   |         | 10     | 7      | 08/11/04 |          | 0        |
| UTI-10 10 8  | PFN-01 UTI 2-5S1 OOP: Explain/quantify any additional adj that would be required to exclude oop trans related to FCC dereg services inclu   |                   |         | 10     | 8      | 08/11/04 |          | 0        |
| UTI-10 10 9  | UTI 3-16 a: Explain approach used to determine cost of capital for states that are not Rate of Return regulated                             |                   |         | 10     | 9      | 08/11/04 | 08/23/04 | 12       |
| UTI-11 11 1  | UTI 7-14 Att A: Explain the extent to which rates charged are based on cost of service, competitive pricing or customer negotiations        |                   |         | 11     | 1      | 08/19/04 |          | 0        |
| UTI-11 11 2  | Revised PFN-03 wp Uncollectibles-Revenue_Annualization2.xls: Provide supporting documentation IC No Hardcopy Att                            |                   | cd only | 11     | 2      | 08/19/04 | 09/17/04 | 29       |
| UTI-11 11 3  | Provide data needed to analyze uncollectible provisions and reserves for listed categories for uncollectible acctg that is segregated       |                   |         | 11     | 3      | 08/19/04 |          | 0        |
| UTI-11 11 4  | Explain the Co acctg procedures for uncollectible rev associated w/ end-user accts and carrier access accounts                              |                   |         | 11     | 4      | 08/19/04 |          | 0        |
| UTI-11 11 5  | UTI 2-6S1 Rev PFN-03 wps: Explain the derivation of each price change amount now input in revise: Ref RUCO 2-23 recv'd 9/14                 |                   |         | 11     | 5      | 08/19/04 | 09/13/04 | 25       |
| UTI-11 11 6  | UTI 2-6S1 Rev PFN-03 wps: Explain how the rev impact amts in PFN-02 can be reconciled to amounts in PFN-03                                  |                   |         | 11     | 6      | 08/19/04 |          | 0        |
| UTI-11 11 7  | UTI 2-6S1 Rev PFN-03 wps: Provide updated access line stat data for months subsequent to Dec 03   |                   |         | 11     | 7      | 08/19/04 |          | 0        |
| UTI-11 11 8  | UTI 2-6S1 Rev PFN-03 wps: What are the known causes for revisions to annualized Dir Assis Rev in Co PFN-03?                                 |                   |         | 11     | 8      | 08/19/04 |          | 0        |
| UTI-11 11 9  | UTI 2-6S1 Rev PFN-03 wps: List the revenue accts where the "driver" in Co adj was only the Dec 03 volume statistic                          |                   |         | 11     | 9      | 08/19/04 | 09/17/04 | 29       |
| UTI-11 11 10 | UTI 2-6S1 Rev PFN-03 wps: Explain why calculated annualization adjs associated w/ listed nonreg accts are not posted                        |                   |         | 11     | 10     | 08/19/04 |          | 0        |
| UTI-11 11 11 | UTI 7-14, UTI 2-6 Misc Rev: Explain why proposed annualization of B&C rev is a downward adj   |                   |         | 11     | 11     | 08/19/04 |          | 0        |
| UTI-11 11 12 | UTI 7-14 Att A: Provide calc of annualized rev impact of each B&C price change  |                   |         | 11     | 12     | 08/19/04 |          | 0        |
| UTI-11 11 13 | Provide for 00-02 and test year actual Directors/Officers Liab Ins exp on total QCII consolidated basi C Hardcopy Att 9/15                  |                   | Y       | 11     | 13     | 08/19/04 | 09/10/04 | 22       |
| UTI-11 11 14 | Provide breakdown of QCII consolidated income tax exp and cash payments to IRS for 02-03  | D-R               |         | 11     | 14     | 08/19/04 |          | 0        |
| UTI-11 11 15 | UTI 4-22: Provide an updated lag day study for "misc vouchers" to replace prior study from 1993   | C Att A 9/15, V   | Y       | 11     | 15     | 08/19/04 | 09/10/04 | 22       |
| UTI-11 11 16 | UTI 4-21: Provide an updated lag day study for "direct rent" to replace prior study from 1994   |                   |         | 11     | 16     | 08/19/04 |          | 0        |
| UTI-11 11 17 | ARMIS 43-02 Table 1-7: Explain activities undertaken by listed law firms  | O                 |         | 11     | 17     | 08/19/04 |          | 0        |
| UTI-11 11 18 | UTI 7-14 Att A UTI 2-6 Misc Rev: Confirm that no pricing changes occurred with respect to services since Jan 01                             |                   |         | 11     | 18     | 08/19/04 |          | 0        |
| UTI-11 11 19 | UTI 2-6S1 Rev PFN-03 wps Misc Rev: Confirm adj increasing Acct. 5240.5 by approx \$7 million but don't include in PFN-03                    |                   |         | 11     | 19     | 08/19/04 |          | 0        |
| UTI-11 11 20 | UTI 7-14 UTI 2-6 PFN-03 wps Misc Rev: Explain the changes that began booking Acct. 5240.53 only in June 02 and subsequent months            |                   |         | 11     | 20     | 08/19/04 |          | 0        |
| UTI-11 11 21 | UTI 7-14 UTI 2-6 PFN-03 wps Misc Rev: Explain why Acct. 5240.5xxx is annualized using Residential Primary Line driver that exhibits declin  |                   |         | 11     | 21     | 08/19/04 |          | 0        |
| UTI-11 11 22 | Provide stat info for each month Jan 01-June 04 for unbundled and rebundled services included in each of the subaccts in 5240.5xxx          |                   |         | 11     | 22     | 08/19/04 |          | 0        |
| UTI-11 11 23 | UTI 7-14 UTI 2-6 PFN-03 wps Misc Rev: Provide copies of entries impacting Acct. 5262.1  |                   |         | 11     | 23     | 08/19/04 |          | 0        |
| UTI-11 11 24 | Identify causes for unusual amount in Acct. 5264.31 and provide copies of entries   |                   |         | 11     | 24     | 08/19/04 |          | 0        |
| UTI-11 11 25 | UTI 2-6 Rev PFN-03 wps Misc Rev Acct. 5264.9 and PFN-01: Explain inconsistency of not including accrual                                     |                   |         | 11     | 25     | 08/19/04 |          | 0        |
| UTI-11 11 26 | R14-103 pg. 121 "Factors": Provide a recon of total State vs. intrastate Misc rev by detailed sub-act Ref RUCO 4-5 recv'd 9/14              |                   |         | 11     | 26     | 08/19/04 | 09/13/04 | 25       |
| UTI-12 12 1  | UTI 2-6S1 Rev PFN-03 wps Access Rev: Explain where Co filing annualizes rev impact of rate adj to state access rev                          |                   |         | 12     | 1      | 08/23/04 |          | 0        |
| UTI-12 12 2  | UTI 5-2 UTI 2-6S1 MOU data: Explain why MOU info for Jan-Jul 01 don't tie to UTI 5-2  |                   |         | 12     | 2      | 08/23/04 |          | 0        |
| UTI-12 12 3  | UTI 6-6 UTI 2-6S1: Explain if Qwest intended to completely remove the BARTONL Activity 390 entry rather than pro-rating it                  |                   |         | 12     | 3      | 08/23/04 |          | 0        |
| UTI-12 12 4  | PFN-08 UTI 1-31 Incent comp: Explain why 03 bonus plan was on consolidated QCII fin targets rather than QC                                  |                   |         | 12     | 4      | 08/23/04 | 09/13/04 | 21       |
| UTI-12 12 5  | PFN-08 UTI 1-31 Incent comp: Explain/reconcile diff between unadj net income pg. 3 Att F with pgs. 34,75 of 03 10-K                         |                   |         | 12     | 5      | 08/23/04 |          | 0        |
| UTI-12 12 6  | PFN-08 UTI 1-31 Incent comp pgs. 3,4 of Att F: Provide detailed explanation of facts of each adjusting item                                 |                   |         | 12     | 6      | 08/23/04 |          | 0        |
| UTI-12 12 7  | PFN-08 UTI 1-31 Incent comp: Provide amt of incent plan costs recorded in 01 and actual bonus plan payout in 02 for 01 plan year            |                   |         | 12     | 7      | 08/23/04 |          | 0        |
| UTI-12 12 8  | UTI 1-31 Incent comp: Provide copy of final 2002 assessment comparable to 2003 Bonus Calc   |                   |         | 12     | 8      | 08/23/04 |          | 0        |
| UTI-12 12 9  | PFN-08 UTI 1-31 Att F Incent comp: Explain creation of pool and how the total pool amount is determined                                     |                   |         | 12     | 9      | 08/23/04 |          | 0        |
| UTI-12 12 10 | PFN-08 UTI 1-31 Incent comp Att F: Provide additional info supporting the development of the business unit targets and actual results       |                   |         | 12     | 10     | 08/23/04 |          | 0        |
| UTI-12 12 11 | PFN-08 UTI 1-31 Att F Incent comp: For two employee positions, provide specimen documents showing how 03 Bonus plan resulted in acct        |                   |         | 12     | 11     | 08/23/04 |          | 0        |
| UTI-12 12 12 | UTI 2-6S1 PFN-03 Acct. 5060.113 CO Features usage: Explain why intrastate Toll Messages are thought to be a "driver"                        |                   |         | 12     | 12     | 08/23/04 |          | 0        |
| UTI-12 12 13 | UTI 2-6S1 PFN-03 Acct. 5060.32 DA Rev-Res: Explain how Co adj to annualize Res DA rev can be reasonable                                     |                   |         | 12     | 13     | 08/23/04 |          | 0        |
| UTI-12 12 14 | UTI 1-8 Att A Acct. 5001.421 Basic Area Rev, Resale, Res Recurring: Explain the nature of transactions recorded in the account              |                   |         | 12     | 14     | 08/23/04 |          | 0        |
| UTI-12 12 15 | UTI 1-8 Att A Acct. 5060.162 Other Local Service, CO Features, Local Routing Service, Usage Charges: Explain nature of transactions         |                   |         | 12     | 15     | 08/23/04 |          | 0        |
| UTI-12 12 16 | UTI 1-8 Att A Acct. 5001.411 Basic Area Rev, Resale, Bus Recurring: Explain nature of transactions recorded in the account                  |                   |         | 12     | 16     | 08/23/04 |          | 0        |
| UTI-12 12 17 | UTI 1-8 Att A Acct. 5060.17 Other Local Service, CO Features, Sales to Affiliates: Explain nature of transactions recorded in the account   |                   |         | 12     | 17     | 08/23/04 |          | 0        |
| UTI-12 12 18 | UTI 1-8 Att A Acct. 5060.43 Other Local Service, CO Features, Radio Common Carrier/Cellular, Usage Charges: Explain nature of transacti     |                   |         | 12     | 18     | 08/23/04 |          | 0        |
| UTI-12 12 19 | UTI 1-8 Att A Acct. 5060.8 Other Local Service, CO Features, Local Rev Activity for SAB 101: Explain nature of transactions recorded in the |                   |         | 12     | 19     | 08/23/04 |          | 0        |
| UTI-12 12 20 | UTI 1-8 Att A Acct. 5060.91 Other Local Service, CO Features, Other Local Exch Business: Explain nature of transactions recorded in the a   |                   |         | 12     | 20     | 08/23/04 |          | 0        |
| UTI-13 13 1  | UTI 1-31 PFN-08 Incent Comp: With continuing losses, would any Incent pmt been made for 2003 absent sale of Dex West?                       |                   |         | 13     | 1      | 09/01/04 |          | 0        |
| UTI-13 13 2  | UTI 1-5, 8-41 Emp levels: 1-5 Att A- do headcounts represent values at end of each qtr or avg headcount during each qtr?                    |                   |         | 13     | 2      | 09/01/04 |          | 0        |
| UTI-13 13 3  | UTI 8-41 Emp levels: Provide the amt of the one-time salary charges removed from both Qwest and AZ amts by month                            |                   |         | 13     | 3      | 09/01/04 |          | 0        |
| UTI-13 13 4  | UTI 8-41, 2-24 Emp levels: Do total AZ monthly "incurred salaries" in 8-41 represent only amts codec Ref 9-4                                |                   |         | 13     | 4      | 09/01/04 | 09/16/04 | 15       |
| UTI-13 13 5  | PFN-09 UTI 2-11 Call ctr corr: Provide copy of supporting spreadsheet file "Call_Ctrr_Exp.xls"  |                   |         | 13     | 5      | 09/01/04 |          | 0        |
| UTI-13 13 6  | UTI 2-11 PFN-09 Call ctr corr: Does stmnt mean Co is still correcting the processes required to correctly allocate call ctr costs ?         |                   |         | 13     | 6      | 09/01/04 |          | 0        |
| UTI-13 13 7  | UTI 2-17 De-emphasis of IntraLATA LD: State with specificity the changes made to QC product promotion activities based upon such evalu      |                   |         | 13     | 7      | 09/01/04 |          | 0        |
| UTI-13 13 8  | What reg restraints serve to protect the QC AZ IntraLATA toll rev streams from migration to QCC, a iOR                                      |                   |         | 13     | 8      | 09/01/04 | 09/16/04 | 15       |
| UTI-13 13 9  | Provide the monthly amts of AZ IntraLATA toll rev billed to QC customers on behalf of QCC in 03 and 04 to date                              |                   |         | 13     | 9      | 09/01/04 |          | 0        |
| UTI-13 13 10 | UTI 1-8, Acct. 5060.42: Explain nature of transactions recorded in acct, typical customers served and types of services provided            |                   |         | 13     | 10     | 09/01/04 |          | 0        |
| UTI-13 13 11 | UTI 1-8, Acct. 5060.43: Explain nature of transactions recorded in acct, typical customers served and type of services provided             |                   |         | 13     | 11     | 09/01/04 |          | 0        |
| UTI-13 13 12 | UTI 1-8, Acct. 5084.xxxx: Explain diff in bal amts between ledger and R14_1203 pg. 121 of 122   |                   |         | 13     | 12     | 09/01/04 |          | 0        |
| UTI-14 14 1  | UTI 5-10 M&S: Explain the "Redback" equipment in PICS inventory, purpose it serves and why include in rate base?                            |                   |         | 14     | 1      | 09/03/04 |          | 0        |
| UTI-14 14 2  | Explain elements of accts 4040.2 IABS and 4040.5 BART, do they reduce intrastate rate base, should interest be applied?                     |                   |         | 14     | 2      | 09/03/04 | 09/16/04 | 13       |
| UTI-14 14 3  | UTI 2-18S1, 2-19S1 Adv: Describe what was Qwest "working on" between June 20 and August 27, what determined burdensor partial 9/17          |                   |         | 14     | 3      | 09/03/04 |          | 0        |
| UTI-14 14 4  | UTI 7-4 Adv: Provide breakdown of test period overall QCII adv exp among the business units, corp entities, products, mkts, RC and QC FC    |                   |         | 14     | 4      | 09/03/04 |          | 0        |
| UTI-14 14 5  | UTI 7-19 ARMSI restmt Dec 01: Explain the entry and identify the years when the "prior transactions" occurred that required restatement     |                   |         | 14     | 5      | 09/03/04 |          | 0        |
| UTI-14 14 6  | Were any studies of Qwest's corp image, branding, customer perceptions conducted prior to decision to commence the "Spirit of Service" r    |                   |         | 14     | 6      | 09/03/04 |          | 0        |
| UTI-14 14 7  | Did Qwest/affil sponsor any sports teams/events, performing arts org during test period that resulting in charges to AZ exp > \$10,000?     |                   |         | 14     | 7      | 09/03/04 |          | 0        |
| UTI-14 14 8  | UTI 7-12 Att G B&C Serv pricing: Does Qwest concur that this adj or some other adj should be made to reflect change in rev requirement?     |                   |         | 14     | 8      | 09/03/04 |          | 0        |
| UTI-14 14 9  | UTI 7-14 Att A B&C Serv pricing: Has Co reflected any constant-price or other price change conventions within its proposed adj?             |                   |         | 14     | 9      | 09/03/04 |          | 0        |
| UTI-14 14 10 | UTI 1-21Att A QSC Charges: For each listed QSC RC, provide description of activities conducted for benefit of QC and its customers          |                   |         | 14     | 10     | 09/03/04 |          | 0        |
| UTI-14 14 11 | UTI 1-21Att A QSC Charges: For each listed QSC RC, provide description of activities conducted for benefit of QC and its customers          |                   |         | 14     | 11     | 09/03/04 |          | 0        |
| UTI-14 14 12 | UTI 9-5 FCC Dereg: Identify/describe the factors/considerations that required the manual overlay  |                   |         | 14     | 12     | 09/03/04 | 09/16/04 | 13       |
| UTI-14 14 13 | UTI 2-28 Att A OPEB: Explain why deregulated services are included in the shareholder column  |                   |         | 14     | 13     | 09/03/04 |          | 0        |
| UTI-14 14 14 | Article in Eastern AZ Courier: Were facilities retired from service prior to donation to Graham County?                                     |                   |         | 14     | 14     | 09/03/04 |          | 0        |
| UTI-14 14 15 | Did QSC incur any costs associated with supporting the transition of pre-merger non-US West entities from Peoplesoft to Profit accounting   |                   |         | 14     | 15     | 09/03/04 |          | 0        |
| UTI-14 14 16 | UTI 1-21, 2-2, 8-49: Provide narrative descriptive listing of all QSC RC's that were active during the 1 Ref 8-50, 1-20                     |                   |         | 14     | 16     | 09/03/04 | 09/13/04 | 10       |
| UTI-14 14 17 | UTI 5-19 Affil Contracts: Provide copy of contract for QSC services being provided to QC in the test 1 Hardcopy Att 9/15                    |                   | Y       | 14     | 17     | 09/03/04 | 09/13/04 | 10       |
| UTI-14 14 18 | UTI 8-44 QSC costs by factor: Identify RC's, explain types of activities and incurred costs for listed "methodologies"                      |                   |         | 14     | 18     | 09/03/04 |          | 0        |
| UTI-14 14 19 | UTI 3-31 QIT: Provide a copy of QIT's strategic planning documentation prepared for year 03   |                   |         | 14     | 19     | 09/03/04 |          | 0        |

# EXHIBIT B

## QWEST'S OUTSTANDING AND OVERDUE DATA RESPONSES THROUGH 9-15-04

| DUNKEL |          |                | STAFF |          |                |
|--------|----------|----------------|-------|----------|----------------|
| 7.1    | due 8-25 | (21 days late) | 20.3  | due 8-30 | (16 days late) |
| 7.2    | due 8-25 | (21 days late) | 27.1  | due 9-11 | (4 days late)  |
| 7.3    | due 8-25 | (21 days late) |       |          |                |
| 7.4    | due 8-25 | (21 days late) |       |          |                |
| 7.6    | due 8-25 | (21 days late) |       |          |                |
| 7.7    | due 8-25 | (21 days late) |       |          |                |
| 7.8    | due 8-25 | (21 days late) |       |          |                |
| 8.7    | due 8-27 | (19 days late) |       |          |                |
| 8.9    | due 8-27 | (19 days late) |       |          |                |
| 8.13   | due 8-27 | (19 days late) |       |          |                |
| 8.17   | due 8-27 | (19 days late) |       |          |                |
| 8.18   | due 8-27 | (19 days late) |       |          |                |
| 8.19   | due 8-27 | (19 days late) |       |          |                |
| 8.20   | due 8-27 | (19 days late) |       |          |                |
| 9.5    | due 8-30 | (16 days late) |       |          |                |
| 10.8   | due 8-30 | (16 days late) |       |          |                |
| 10.9   | due 8-30 | (16 days late) |       |          |                |
| 10.11  | due 8-30 | (16 days late) |       |          |                |
| 10.12  | due 8-30 | (16 days late) |       |          |                |
| 10.15  | due 8-30 | (16 days late) |       |          |                |
| 10.16  | due 8-30 | (16 days late) |       |          |                |
| 11.2   | due 9-3  | (12 days late) |       |          |                |
| 11.3   | due 9-3  | (12 days late) |       |          |                |
| 11.4   | due 9-3  | (12 days late) |       |          |                |
| 11.5   | due 9-3  | (12 days late) |       |          |                |
| 11.6   | due 9-3  | (12 days late) |       |          |                |
| 11.8   | due 9-3  | (12 days late) |       |          |                |
| 11.10  | due 9-3  | (12 days late) |       |          |                |
| 11.11  | due 9-3  | (12 days late) |       |          |                |
| 11.12  | due 9-3  | (12 days late) |       |          |                |

# EXHIBIT C

Arizona  
T-01051B-03-0454 and T-00000D-00-0672  
UTI 14-003

INTERVENOR: Utilitech, Inc.

REQUEST NO: 003

Ref. Qwest Responses to UTI 2-18S1 and UTI 2-19S1 (Advertising). According to the Company's initial responses on June 20, "We are currently working on getting the costs broken down by product line and campaign and will provide this as soon as possible". Then, in its "Supplemental Response Dated 8/27/04" to each question, the Company stated, "Qwest does not track advertising costs by ad campaign. It would take a burdensome special study to determine the amount by ad campaign associated with QC-Arizona product-specific advertising." Please provide the following information:

- a) Please describe what Qwest was "working on" between June 20 and August 27.
- b) State what facts and circumstances caused the Company to ultimately determine such work to be a burdensome special study.
- c) Provide complete copies of all advertising cost analyses, workpapers, reports and other data that were compiled during the 68-day period when Qwest was "currently working on getting the costs broken down".
- d) Identify the processes, policies, reports, budgetary controls and all documentation relied upon by Qwest management to plan, monitor and allocate resources to advertising that is product-specific or non-product specific.
- e) Provide copies of documents associated with your response to part d that relate to test period product specific and non-product specific advertising expenditures.
- f) Explain how advertising costs are attributed or allocated among Qwest business units and RCs, given the policies, processes and controls identified in response to part d.
- g) Provide a breakdown of test period product-specific and non-product specific advertising costs by Qwest Corporation business unit/ RC, indicating the general family of products within each of the business units/ RCs.

## RESPONSE:

a) Between June 20 and August 27 Qwest has been answering hundreds of data requests from Utilitech and other intervenors in this docket. Qwest spent a considerable amount of time trying to figure out a way to provide the advertising costs by ad campaign for QC Arizona. Qwest concluded that it would take an extensive special study to accomplish this. See response to b) for what would be involved to provide this information at the detail requested. The advertising costs that were available were provided in response to UTI 2-18 and 2-19 on June 18th, UTI 1-12 on June 15th, UTI 4-29 on August 18th and UTI 8-31 on September 2nd.

In response to UTI 1-12S1 that was filed June 25th Qwest stated: "The corporate advertising costs are not tracked by campaign/message."

In response to UTI 7-04 that was filed on August 3rd, Qwest stated: "Qwest objects to this request on the grounds that it is unduly burdensome. Advertising costs are not tracked by affiliate at an advertising campaign level. It would require an extensive special study to provide this

# EXHIBIT C

information."

In response to UTI 6-16 that was filed on August 6th Qwest stated: "Qwest objects to this request on the grounds that it is unduly burdensome. Without waiving its objection Qwest responds as follows: Qwest Services Corporation manages all advertising costs for the family of Qwest Companies. Advertising costs are not tracked by affiliate at an advertising campaign level. It would require an extensive special study to provide this information."

These responses are virtually the same response provided in the supplements to UTI 2-18 and 2-19. Because we were inundated with other data requests and we had already answered this question several times, the supplements were not a priority over all of the other data requests that we had to answer.

b) There are over 1,000 invoices for advertising in 2003. QSC does not track advertising costs by ad campaign, so there is no way to mechanically pull this information out of a system or pre-existing report. To provide the information by ad campaign, someone would have to go through each invoice and determine what ad campaign it was for, for which entities, by RC and account code. Some invoices were paid directly by QC, some were paid by QSC and reimbursed by QC or another affiliate as a flow through bill and some were billed back to QC and other affiliates through the QSC Headquarter bill allocation process. Each bill would need to be analyzed to determine which method was used. If it was billed through the QSC Headquarter allocation process, we would need the RC it was booked to to determine what allocation methodology was used to bill back to QC and other affiliates. We would have to simulate the allocation process to QC and then determine what account and geographic code it was booked to on QC's books to determine what amount was allocated to Arizona and then apply the intrastate factor for that account to allocate it to Arizona intrastate.

In addition, this process would still not identify the internal QSC employee's salaries and expenses to an ad campaign. This would virtually be impossible to provide.

Therefore, this request was determined to require a burdensome special study.

c) There are no cost analysis, work papers, reports and other data to provide other than what was provided in UTI 1-12, 2-18, 2-19, 4-29 and 8-31.

d)-g) Qwest is in the process of gathering this information and will provide it as soon as it is available.

Respondent: parts a-c: Janet Ortega, Lead Finance/Business Analyst  
parts d-g: Delmar Wyatt, Staff Director Marketing