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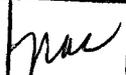
WILLIAM A. MUNDELL
Commissioner

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH SECTION 271
OF THE TELECOMMUNICATIONS
ACT OF 1996

DOCKET NO. T-00000A-97-0238

Arizona Corporation Commission
DOCKETED

APR 16 2001

DOCKETED BY 

**WORLDCOM'S COMMUNICATIONS COMPANY'S RESPONSES TO QWEST
CORPORATION'S SECOND SET OF DATA REQUESTS**

WorldCom, Inc., on behalf of its regulated subsidiaries ("WorldCom") provides the following responses to Qwest Corporation's ("Qwest") Second Set of Data Requests:

RESPONSES TO DISCOVERY REQUESTS

Data Request No. 1.

To the extent you advocate that Qwest should offer EEL splitting, please describe the technical specifications of such a product. Please identify which facilities are to be "split" and describe technically how such "splitting" would occur. Please produce all documents related to or supporting your response.

Response.

WorldCom objects to this data request on the ground that it is vague and ambiguous. Specifically, Qwest has failed to define what it means by "EEL splitting." WorldCom has not used the term "EEL splitting" in its advocacy before the Commission.

Subject to and without waiving this objection, if what Qwest has intended by this request is to apply a new label, "EEL splitting", to the connection of a line split loop to dedicated transport, WorldCom's understanding of how such a product would be provisioned is as follows: The voice portion of the loop is connected to dedicated transport. The data portion of the split loop is handed off in the same manner as line

splitting at the central office where the loop terminates. There is no reason that a split loop cannot or should not be combined with transport, or other unbundled network elements with which a loop could otherwise be combined. Pursuant to the *Line Sharing Reconsideration Order*, a CLEC may access and provide service over the high frequency portion of the loop regardless of the configuration or arrangement utilized by the voice provider (i.e., an EEL or an unbundled loop). Accordingly, a carrier is entitled to pursue partnering arrangements with the other providers of its choice to provide line split voice and data service to an end user, regardless of the manner by which such other providers choose to provide that service to the end users. Qwest, therefore, may not restrict a carrier's right to engage in line splitting arrangements only with UNE-P other providers, as Qwest's current SGAT language indicates it intends to do. Rather, Qwest must permit a carrier to partner with both UNE-P and non-UNE-P providers in order to provide line split services to end-users. WorldCom considers "EEL Splitting" as it has described the concept as a UNE combination authorized by FCC decisions. WorldCom has advocated the ability to obtain combined UNES, but has not specifically advocated a UNE combination known as EEL Splitting.

Data Request No. 2.

To the extent you advocate that Qwest should offer EEL splitting, please provide all documents evidencing your current and future demand for, and plans to use, EEL splitting in Arizona.

Response.

WorldCom objects to this data request for the reasons stated in its objections stated in Response to Data Request No. 1. Subject to and without waiving its objections, WorldCom has no identified present demand forecast for EEL splitting as that term is described in Response to Data Request No 1.

Data Request No. 3.

To the extent you advocate that Qwest should offer line splitting associated with Qwest resold voice service, please provide all documents evidencing your current and future demand for, and plans to use, such a product in Arizona.

Response.

WorldCom objects to this data request for the reasons stated in its objections stated in Response to Data Request No. 1. Subject to and without waiving its objections, see Responses to Data Request Nos. 1 and 2.

Data Request No. 4.

To the extent you advocate that Qwest should offer line splitting associated with Qwest resold voice service, please describe all reasons and facts justifying the need for such a product given the availability of UNE-P line splitting and of conversions from resold voice to UNE-P voice and the cost savings to CLECs associated with UNE-P voice as opposed to resold voice. Please include an explanation of the circumstances under which you would utilize line splitting associated with Qwest resold voice service (assuming its availability) instead of UNE-P line splitting. Please provide all documents that are relevant to, or support, your response.

Response.

WorldCom objects to this data request for the reasons stated in its objections stated in Response to Data Request No. 1. Subject to and without waiving its objections, WorldCom has not advocated line splitting associated with Qwest resold voice service.

Data Request No. 5.

To the extent you advocate that Qwest should offer line splitting products for UNE combinations including Qwest loops other than UNE-P line splitting and EEL splitting, please describe the technical specifications of such additional line splitting products. Please identify which facilities are to be "split" and describe technically how such "splitting" would occur. Please produce all documents related to or supporting your response.

Response.

WorldCom objects to this data request for the reasons stated in its objections stated in Response to Data Request No. 1. Subject to and without waiving its objections, *see* Response to Data Request No. 1. Further WorldCom has not advocated that Qwest should offer line splitting products for UNE combinations including Qwest loops other than UNE-P line splitting and EEL splitting.

Data Request No. 6.

To the extent you advocate that Qwest should offer line splitting products for UNE combinations including Qwest loops other than UNE-P line splitting and EEL splitting, please provide all documents evidencing your current and future demand for, and plans to use, such additional line splitting products in Arizona.

Response.

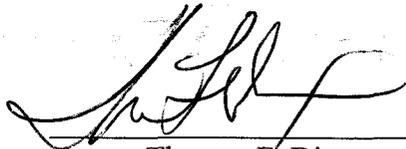
WorldCom objects to this data request for the reasons stated in its objections stated in Response to Data Request No. 1. Subject to and without waiving its objections, *see* Responses to Data Request No. 1 and 2. Further WorldCom has not advocated that

Qwest should offer line splitting products for UNE combinations including Qwest loops other than UNE-P line splitting and EEL splitting.

Dated this 12th day of April, 2001.

WORLD.COM, INC.

By:



Thomas F. Dixon
707 - 17th Street, #3900
Denver, Colorado 80202
303-390-6206
303-390-6333 (facsimile)

ORIGINAL copy e-mailed and hand delivered
this 13th day of April, 2001 to:

Charles Steese
Andrew Crain
Qwest Corporation
1801 California Street, Suite 5100
Denver, CO 80202

CERTIFICATE OF SERVICE

I, Heidi K. Yore, hereby certify that an original and ten (10) copies of the WorldCom's Responses to Qwest Corporation's Second Set of Data Requests, in Docket No. T-00000A-97-0238, were sent for filing via overnight delivery on this 13th day of April, 2001, to the following:

Arizona Corporation Commission
Docket Control-Utilities Division
1200 West Washington Street
Phoenix, AZ 85007-2996

and a true and correct copy of the foregoing was served via overnight delivery this 13th day of April, 2001, on the following:

Jane Rodda
Hearing Officer
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Matt Rowell
Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Phil Doherty
Doherty & Company, Inc.
545 South Prospect Street, Suite 22
Burlington, VT 05401

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338

Charles Steese
Andrew Crain
Qwest Corporation
1801 California Street, Suite 5100
Denver, CO 80202

Maureen Arnold
Qwest Communications, Inc.
3033 N. Third Street, Room 1010
Phoenix, Arizona 85012

K. Megan Doberneck
Covad Communications Company
7901 Lowry Boulevard
Denver, CO 82030

and a true and correct copy of the foregoing was sent via e-mail to:

'csteese@uswest.com'; 'tberg@fclaw.com'; Steven Beck [srbeck@uswest.com] 'Betty Jean Griffin.'; 'andrea.harris@allegiancetelecom.com';
'lyndall.nipps@allegiancetelecom.com'; 'drfinch@att.com'; 'rwolters@att.com';
'swakefield@azruco.com'; 'rhip@bellatlantic.net'; 'hagood@bellsouth.net';
'dscott@cc.state.az.us'; 'maureenscott@cc.state.az.us'; Doberneck, Megan;
'richard.smith@cox.com'; 'DanWaggoner@DWT.COM'; 'GregKopta@DWT.COM';
'laurenflaherty@DWT.COM'; 'tracigrundon@DWT.COM'; 'klclauson@eschelon.com';
'tberg@fclaw.com'; 'mmg@gknet.com'; 'aisar@harbor-group.com';
'barbara.c.young@mail.sprint.com'; 'darren.weingard@mail.sprint.com';
'eric.s.heath@mail.sprint.com'; 'stephen.H.Kukta@mail.sprint.com';
'jsburke@omlaw.com'; 'mpatten@rhd-law.com'; 'rheyman@rhd-law.com';
'dhsiao@rhythms.net'; 'tmumaw@swlaw.com'; 'mdd@tblaw.com';
'joyce.hundley@usdoj.gov'; 'acrain@uswest.com'; 'jragge@uswest.com';
'mjarnol@uswest.com'; 'terry.tan@wcom.com'; 'gcw@gknet.com'; Mirabella, Nancy


Heidi K. Yore