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Qwest

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2008 MAY -9 P 12: 25

AZ CORP COMMISSION  
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Arizona Corporation Commission  
DOCKETED

MAY - 9 2008

Kathy Rowley  
Staff Paralegal-Interrogatory Manager

DOCKETED BY 

May 8, 2007

VIA HAND OR OVERNIGHT DELIVERY

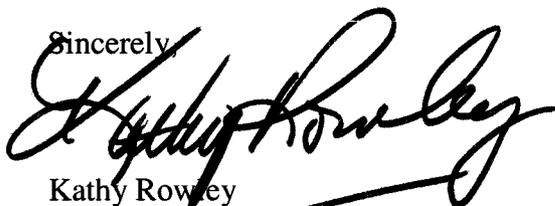
Richard Boyles  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007  
[rboyles@azcc.gov](mailto:rboyles@azcc.gov)

**Re: Staff's Letter of Insufficiency and First Set of Data Requests to Qwest Corporation, Docket Nos. T-02847A-08-0164 and T-01051B-08-0164**

Dear Mr. Boyles:

Enclosed are Qwest's responses to the above-referenced requests, Nos. 001-012. Should you have any questions regarding the attached, you may contact me at (303) 383-6679.

Sincerely,



Kathy Rowley

Enclosures

cc: Docket Control  
Norman Curtright, Esq.  
Bradley S. Carroll, Esq.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-001

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 001

Please provide copies of any data requests served on Qwest Corporation ("Qwest" or the "Company") by any other party in this docket and Qwest's responses thereto.

RESPONSE:

To date, Qwest has received no other data requests concerning this matter. Qwest will supplement this response at such time as any future data requests are received.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-002

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 002

Has Qwest received any requests for service from anyone located within the area referred to in the joint Application as the Zona Extension Area? If yes, please copies of the requests.

RESPONSE:

Not to Qwest's knowledge.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-003

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 003

Has Qwest received any requests for service from anyone located within the area referred to in the joint Application as the Qwest Extension Area? If yes, please copies of the requests.

RESPONSE:

Not to Qwest's knowledge.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-004

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 004

Do potential customers to whom service has not been extended currently exist in the Zona Extension Area? If yes, please identify the quantity, their approximate location and the reasons for which Qwest has not extended service.

RESPONSE:

Not to Qwest's knowledge.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-005

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 005

Is the customer identified in Section V of the Joint Application located within the western non-contiguous portion of Qwest Phoenix Metro service area? If no, please explain.

RESPONSE:

No. The customer is located at 20300 W. Olive Ave, which is in Section 29, Township 3N, Range 2W. Qwest's service at this location was installed prior to Accipiter's CC&N Application dated 9/8/2003 which eventually included this area within their service territory. Prior to Decision No. 67675, which approved the expansion of Accipiter's CC&N on March 9, 2005, this section would have been in Open Territory. Qwest discovered that it was providing service at this location in approximately July of 2007, at which time it notified Accipiter of the situation and proposed that Accipiter transfer this section to Qwest concurrent with the proposed transfer of the Lake Pleasant 5000 area to Accipiter.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-006

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 006

Please describe the Qwest facilities which traverse the Qwest Extension Area.

RESPONSE:

No known Qwest facilities exist in the proposed Qwest Extension Area other than the 100 pair cable which runs through the Qwest Extension area on Olive Rd turning onto White Tank Mountain Rd into the non continuous territory in section 18.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-007

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 007

Would Qwest's costs to provide service to the Qwest Extension Area necessitate line extension charges being applied to requests for service within the area?

RESPONSE:

Line Extension charges will not apply, but developers are subject to the PAHD tariff, which permits Qwest to bill for facilities extended to a given development.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-008

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 008

Would the Qwest Extension Area be designated as being within the Phoenix Metro base rate area? If no, please explain.

RESPONSE:

Yes.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-009

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 009

Do any Qwest affiliates have any objections to the proposed exchange of service area requested in the Joint Application? If yes, please explain.

RESPONSE:

No.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-010

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 010

Do all Qwest affiliates accept that this transaction in no way changes the terms and conditions of decisions granting them authority to provide telecommunications within the state of Arizona? If no, please explain.

RESPONSE:

Yes.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-011

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 011

For what reasons did Qwest agree to the proposed exchange of service area with Accipiter and why does Qwest believe such a transfer is in the Public Interest?

RESPONSE:

The proposed exchange of service area is in the public interest because it would allow service to be provided by the company whose facilities are best situated to serve each of the areas being transferred.

Qwest agreed to the transfer of the Lake Pleasant 5000 area to Accipiter because Qwest has no facilities in that area and no agreements with any potential developers to provide facilities. The transfer also is in the public interest because both parties are willing participants to the transfer and it involves only boundary changes, i.e. no existing customers or facilities are affected by the proposal.

Qwest proposed transferring the Qwest Extension Area from Accipiter because Qwest has existing facilities that traverse the area and also because it had been providing service for at least 10 years to a previously unknown customer in this area. The transfer of this area to Qwest is in the public interest because it will allow the customer to continue to receive service from Qwest and avoid having to change carriers. Further, Accipiter has no existing facilities in this area and would have to incur substantial costs to extend its existing service in order to be able to provision service to Qwest's customer.

Arizona  
Docket Nos. T-02847A-08-0164 and  
T-01051B-08-0164  
STF 01-012

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 012

Are there any developments that extend across the boundary of Qwest's current service area and the Qwest Extension area? If yes, please describe.

RESPONSE:

No known developments extend across the boundary of Qwest's current service area and the Qwest Extension area.