



0000096416

BEFORE THE ARIZONA CORPORATION COMMISSION  
**RECEIVED**

Arizona Corporation Commission  
**DOCKETED**  
JUL 12 2001  
WILLIAM A. MUNDELL  
Chairman  
JIM IRVIN  
Commissioner  
MARC SPITZER  
Commissioner

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AZ CORP COMMISSION  
DOCUMENT CONTROL

DOCKETED BY

IN THE MATTER OF INVESTIGATION )  
INTO U S WEST COMMUNICATIONS, )  
INC.'S COMPLIANCE WITH CERTAIN )  
WHOLESALE PRICING REQUIREMENTS )  
FOR UNBUNDLED NETWORK )  
ELEMENTS AND RESALE DISCOUNTS )

DOCKET NO. T-00000A-00-0194  
MOTION TO STRIKE QWEST'S  
TRANSPORT MODULE AND LOOP  
MODULE

**I. INTRODUCTION**

Despite repeated requests by AT&T, Qwest has failed to produce the documentary support underlying the material investments assumed by two of the cost modules at issue in this proceeding. In fact, Qwest initially claimed that it had produced the documents, admitting that they had not been produced only after AT&T's own analysis revealed that Qwest had not produced supporting materials as claimed. Because of Qwest's failure, AT&T has had no opportunity to analyze Qwest's allegations regarding the material investments that underlie some of its cost proposals in this proceeding. For this reason, AT&T requests that cost models and studies at issue be stricken.

**II. ARGUMENT**

Qwest's Integrated Cost Module ("ICM") provides the recurring prices for most of the unbundled elements that are proposed by Qwest in this proceeding. The three primary subcomponents of this model that produce the investments from which the recurring costs are then calculated are the Switching Cost Module ("SCM"), the Loop Module ("LoopMod"), and

the Transport Module ("TM").<sup>1</sup> Qwest also provided several other models with its testimony, including a Collocation Cost Model and a model for the calculation of nonrecurring costs.

On April 11, 2001, AT&T propounded discovery requests designed to elicit from Qwest the documentation supporting its cost models to allow AT&T to provide testimony in this proceeding. See Exhibit A. In response to thirteen of the eighty-seven questions propounded, Qwest initially responded by objecting that the request called for the production of "proprietary business information involving a third party." See Exhibit B. AT&T subsequently served additional data requests. Qwest also responded to many of these requests by stating that it could not release the data requested without permission from its vendors. See Exhibit C. In essence, Qwest's response to each request was that although it had possession of the requested documents, it would not produce them until the parties with whom it contracted agreed that the documents could be released.

The requests at issue sought information regarding the contract prices and other documents that Qwest claims are the basis for the assumptions in its cost models regarding the material investments required to provide unbundled elements. Qwest provided none of the requested information by May 16, 2001, when AT&T's direct testimony was due to be filed with the Commission. At AT&T's request, Qwest agreed that AT&T would be permitted to file additional testimony when Qwest finally provided the required information.

On June 7, 2001 (almost two months after the initial Requests), Qwest finally provided some of the materials requested. Rather than clearly identifying the data requests to which

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<sup>1</sup> AT&T previously filed a motion to strike Qwest's SCM because Qwest did not provide the passwords required to review the model until June 27, 2001, less than two weeks before the originally scheduled hearing date. In recognition that these important issues should be decided on the merits, AT&T withdrew that motion upon agreement that the parties would move an examination of Qwest's switching costs into a later phase of the proceedings so that AT&T would have a sufficient opportunity to review the SCM. In the same spirit, AT&T would consider the same agreement on these issues.

documents were responsive, Qwest produced all of the documents in response to a single data request -- Data Request No. 92. Qwest then simply referenced Data Request 92 in response to each of the data requests it had previously failed to answer. See Exhibits B and C. Unraveling which data requests have been answered by this production requires nothing short of wizardry on AT&T's part. The Qwest response to Data Request No. 92 contained in excess of 30 contracts, each between 30 and 50 pages in length, with no indication of which contract responds to which data request.

Upon analyzing what was provided on June 7, AT&T was able to ascertain that Qwest had not provided all of the documents that had been requested. In fact, in response to several requests, Qwest disingenuously stated that documents were being produced, when in fact no responsive documents were produced at all. For example, Qwest's June 7, 2001 Supplemental Responses to Data Requests 64, 74, 76, 90 and 113 each stated that Qwest had provided responsive material with its Supplemental Response to Data Request No. 92. See Exhibits B and C. No such documents were actually produced with the June 7 supplemental responses. Although Qwest did produce some materials relating to its collocation cost studies and some of its other materials relating to pricing, Qwest provided none of the contracts supporting its outside plant placement costs (one of the primary costs underlying LoopMod) or the material investments used in the Transport Module.

AT&T served additional discovery seeking to have Qwest identify which data requests it had fully answered with its June 7 response. Qwest then provided some additional materials in response to certain of the data requests in a second supplemental response received by AT&T on July 2, 2001, one week before the initially scheduled hearing date. It appears that some of the contracts underlying Qwest's outside plant placement costs may have been produced with this

response. In response to additional discovery, however, Qwest has stated that it produced current contracts regarding the placement of outside plant, but that it has apparently not produced all of the contracts that it actually relied upon in deriving the outside plant costs set forth in LoopMod. See Exhibit D. More alarming, Qwest finally admitted on July 5, 2001 that it has produced none of the contracts upon which it relies for the material investments in its Transport Module. See Exhibit E. Moreover, even after a direct data request and other requests by counsel to counsel for Qwest, Qwest still will not state definitively whether it has produced all of the documents requested by the other data requests initially propounded in April 2001. See Exhibit F.

Qwest's persistent failure to provide the documents requested, combined with its disingenuity in claiming that it had provided responsive documents when, in fact, it had not, requires the imposition of sanctions. As indicated by the testimony of Mr. Weiss, AT&T has had no opportunity to analyze the material investment assumptions underlying Qwest's Transport and Loop Modules because of Qwest's failure to provide the documents underlying those assumptions. See Exhibit G. Although Qwest stated at the time AT&T initially filed its testimony that it would permit AT&T to file supplemental testimony addressing the material investment issues, there is now no time for the necessary analysis prior to the scheduled hearing. Permitting Qwest to rely on these materials, therefore, will result in unfair prejudice to AT&T and the other parties.

### **III. CONCLUSION**

On this basis, AT&T seeks an order striking the Transport Module and LoopMod components of the Integrated Cost Model along with all cost studies prepared in reliance on these models.

DATED this 12<sup>th</sup> day of July, 2001.

**AT&T COMMUNICATIONS OF THE  
MOUNTAIN STATES, INC. AND XO  
ARIZONA, INC.**

By: J. S. Burke for  
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DAVIS WRIGHT TREMAINE LLP  
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## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the AT&T's Motion to Strike Qwest's Motion to Transport Module and Loop Module, regarding Docket No. T-00000A-00-0194, were hand delivered this 12th day of July, 2001, to:

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

and that a copy of the foregoing was hand-delivered this 12th day of July, 2001 to the following:

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Director - Utilities Division  
Arizona Corporation Commission  
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Phoenix, AZ 85007

Dwight D. Nodes, Administrative Law  
Judge  
Hearing Division  
Arizona Corporation Commission  
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Phoenix, AZ 85007

and that a copy of the foregoing was sent via United States Mail, postage prepaid, on the 12th day of July, 2001 to the following:

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A handwritten signature in cursive script, appearing to read "Annie Emyle", is written over a horizontal line.

**A**



## Davis Wright Tremaine LLP

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April 11, 2001

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3003 N. Central Ave., Suite 2600  
Phoenix, AZ 85012-2913

Kathryn E. Ford  
Qwest Corporation  
1801 California Street, Suite 4900  
Denver, CO 80202

Re: ACC Docket No. T-00000A-00-0194

Dear Mr. Berg and Ms. Ford:

Enclosed please find *AT&T's Second Set of Data Requests to Qwest Corporation* in the above-referenced matter. Please respond within ten calendar days of your receipt of the copy of this letter. If you have any questions, please contact me at the phone number, or e-mail address, above.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in black ink that reads "Larry J. Weathers". The signature is written in a cursive style and is positioned above the typed name and title.

Larry J. Weathers  
Paralegal

Attachment

cc: Mary Steele  
Rick Wolters

**BEFORE THE ARIZONA CORPORATION COMMISSION**

**WILLIAM A. MUNDELL**  
**Chairman**  
**JAMES M. IRVIN**  
**Commissioner**  
**MARC SPITZER**  
**Commissioner**

**IN THE MATTER OF INVESTIGATION ) DOCKET NO. T-00000A-00-0194**  
**INTO U S WEST COMMUNICATIONS, )**  
**INC.'S COMPLIANCE WITH CERTAIN )**  
**WHOLESALE PRICING REQUIREMENTS )**  
**FOR UNBUNDLED NETWORK )**  
**ELEMENTS AND RESALE DISCOUNTS )**

**AT&T'S SECOND SET OF DATA REQUESTS TO  
QWEST CORPORATION**

AT&T Communications of the Mountain States, Inc., hereby submits its Second Set of Data Requests to Qwest Communications, Inc. ("Qwest").

**INSTRUCTIONS AND DEFINITIONS**

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

1. The terms "Qwest," "you," and "your" shall include Qwest Communications, Inc. and its predecessors, parents, subsidiaries, and affiliates, and their former and present officers, attorneys, employees, servants, agents and representatives, and any person acting on their behalf for any purpose.

**INSTRUCTIONS**

A. These data requests shall be deemed to be continuing. Qwest is obliged to change, supplement, and correct all answers to interrogatories and responses to the production request to conform to available information, including such information as first becomes available to Qwest after the answers and production of documents hereto are filed and made, should additional information become known or should information supplied in the answers or documents prove to be incorrect or incomplete.

B. The Response to each data request provided should first restate the question asked and also identify the person(s) supplying the information.

C. Please provide your responses in written form and also provide an electronic version of your responses on a 3½" floppy disk.

D. In answering these data requests, furnish all information that is available to you or may be reasonably ascertained by you, including information in the possession of any of your agents or attorneys, or otherwise subject to your knowledge, possession, custody or control.

E. If in answering these data requests you encounter any ambiguity in construing the request or a definition or instruction relevant to the inquiry contained within the interrogatory or request, set forth the matter deemed "ambiguous" and set forth the construction chosen or used in answering the interrogatory or responding to the request.

F. If you object to any part of a request, answer all parts of such requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

G. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, contained in a document, set forth with respect to the document:

- (i) the date and number of pages of the document;
- (ii) the identity of the author(s) and/or preparer(s);
- (iii) the identity of the addressee, if any;
- (iv) the title;
- (v) the type of tangible thing (e.g., letter, memorandum, telegram, chart, report, recording disc);
- (vi) the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);
- (vii) the identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;
- (viii) the identity of the present custodian(s);
- (ix) the nature of your claim of non-discoverability (e.g., attorney-client privilege); and

(x) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit AT&T to make a full determination as to whether your claim is valid.

### DATA REQUESTS

AT&T 2-022: RE: Collocation Cost Study  
Witness: Million

Does Qwest have any policy or procedure in place in Arizona or any other state in the former U S WEST region that the unamortized portion of relevant nonrecurring charges should be refunded to a vacating collocator upon the occupation of the vacated collocation facilities by either Qwest or a subsequent collocator? If so, please produce documents that describe each such policy or procedure.

AT&T 2-023: RE: Collocation Cost Study  
Witness: Million

What does the collocation study in Arizona assume is the average distance of the main floor ground to the caged collocation areas? What does the collocation study assume is the average distance of the main floor ground to the cageless collocation areas?

AT&T 2-024: RE: Collocation Cost Study  
Witness: Million

What is the process that Qwest uses to select contractors to provision requests for collocation in Qwest Central Offices? Does Qwest use competitive bidding? If so, please describe the bidding process and the criteria used to select a winning bid. If Qwest does not use competitive bidding, please describe the processes used by Qwest to assure the reasonableness of contractors' costs. Also, please produce all Qwest policy statements, sample bid packages and other documents that describe Qwest's policies and processes for selecting collocation contractors.

AT&T 2-025: RE: Collocation Cost Study  
Witness: Million

What is the process that Qwest uses to select contractors to provision requests for providing cable, laying out cable and terminating ground and power cable in Qwest Central Offices? Does Qwest use competitive bidding? If so, please describe the bidding process and the criteria used to select a winning bid. If Qwest does not use competitive bidding, please

describe the processes used by Qwest to assure the reasonableness of contractors' costs. Also, please produce all Qwest policy statements, sample bid packages and other documents that describe Qwest's policies and processes for selecting collocation contractors.

AT&T 2-026: RE: Collocation Cost Study  
Witness: Million

Of the maintenance troubles reported to Qwest in Arizona across all services for the time period 1/1/2000 to 3/31/2001, what is the percentage of such maintenance troubles that Qwest has determined related to wiring troubles in the Central Office? What is the percentage related "Test Okays"? If Qwest cannot provide this information for the identified time period, please provide the information for the most recent available time period.

AT&T 2-027: RE: Collocation Cost Study  
Witness: Million

Please provide all documents that support Qwest's calculation of the engineering element referenced in the collocation cost study for Arizona (see tab "E. 2.1 & 3.1 Engineering"), including a break-out of the costs estimated for each job listed in the study. This request includes all invoices, labor contracts, subject mater expert estimates and all other documents that support Qwest's calculation.

AT&T 2-028: RE: Collocation Cost Study  
Witness: Million

Please provide all documents that support Qwest's calculation of the major and minor job cost elements found within the collocation study for Arizona, including but not limited to cable racking, aerial support and HVAC. This request includes all invoices, labor contracts, subject mater expert estimates and all other documents that support Qwest's calculation. (See tabs "E. 2.1 & 3.1 Aerial Support" and "E. 2.1 & 3.1 Cable Racking".)

AT&T 2-029: RE: Collocation Cost Study  
Witness: Million

With respect to the collocation cost study for Arizona, please identify each of the non-recurring components of a standard collocation that Qwest contends may be used by more than one collocator, state the number of collocators Qwest presumes will use each such component and state how Qwest determined its estimate of the number of collocators it anticipates will use the facilities. In addition, please produce all documents upon which Qwest relies to support its estimates of the number of collocators who will use the facilities.

AT&T 2-030: RE: Collocation Cost Study  
Witness: Million

Please state the number of collocators presently located in each Qwest central office in the state of Arizona, identifying each central office by common language location identifier ("CLLI") and Qwest's name.

AT&T 2-031: RE: Collocation Cost Study  
Witness: Million

Please provide the actual costs Qwest incurred for each collocation arrangement that has been completed in Arizona since January 1, 2000, as well as invoices, time sheets, and any other documents supporting those cost figures, separately for the following categories:

- a. Physical construction, including creation of the physical collocation cage enclosures and site preparation;
- b. The construction of any cable racking or core drills within the central office for electrical and/or telecommunications-related cabling;
- c. The construction of utility holes, conduit runs, and fiber entrances into the central office;
- d. Electrical work, including but not limited to installation of DC battery plant and associated power facilities and cabling and convenience AC power and lighting;
- e. Mechanical work associated with the addition or extension of heating, air conditioning, and ventilation ("HVAC") systems and associated ductwork and control systems;
- f. Central office security measures, including card reading equipment and installation, surveillance cameras, and related work; and
- g. Any other physical collocation construction and/or space preparation costs not identified in Qwest's responses to the other subparts of this request.

AT&T 2-032: RE: Collocation Cost Study  
Witness: Million

For each Qwest central office in Arizona in which a competing local exchange company has physically or virtually collocated equipment or requested collocation, please provide the actual costs, including all invoices, time sheets, and any other supporting documents, Qwest has incurred since January 1, 2000, to undertake the following work for itself:

- a. Physical construction, including reclamation of space and installation of equipment racks;
- b. The construction of any cable racking or core drills within the central office for electrical and/or telecommunications-related cabling;
- c. The construction of utility holes, conduit runs, and fiber entrances into the central office;
- d. Electrical work, including but not limited to installation of DC battery plant and associated power facilities and cabling and convenience AC power and lighting;
- e. Mechanical work associated with the addition or extension of heating, air conditioning, and ventilation (HVAC) systems and associated ductwork and control systems.
- f. Central office security measures, including card reading equipment and installation, surveillance cameras, and related work.

AT&T 2-033: RE: Collocation Cost Study  
Witness: Million

For each collocation arrangement that has been completed in Arizona since January 1, 2000, please describe how Qwest has provided DC power to the collocated equipment, including but not limited to the following:

- a. The size, capacity, and location of the battery distribution fuse bay ("BDFB") closest to the collocated equipment;
- b. The size, number, and approximate length of cables installed between the BDFB identified in subpart a and the BDFB associated with the DC battery plant;
- c. The size, number, and approximate length of cables installed between the BDFB identified in subpart a and the collocated equipment;

- d. The total capacity (in number and size of cables) of the cable racking and core drills used to install the DC power cable from the DC battery plant to the collocated equipment and the amount of the total capacity occupied by the DC power cable dedicated to the use of the individual collocated carrier;
- e. Whether the cable racking and core drills used to install the DC power cable is shared with power or fiber cables used by USWC and/or other carriers.

AT&T 2-034: RE: Collocation Cost Study  
Witness: Million

For each collocation arrangement that has been completed in Arizona since January 1, 2000, please describe how Qwest has provided the facilities that comprise the Entrance Enclosure, as defined in Qwest's collocation cost study, between the requesting carrier's network and its collocated equipment, including but not limited to the following:

- a. The size, capacity, and location of the utility hole(s) outside the central office that serve(s) as the point(s) of interconnection ("POI(s)");
- b. The size, number, capacity, and approximate length of conduit from the utility hole(s) into the cable vault;
- c. The approximate length of fiberoptic cable installed between the cable vault and the collocated equipment;
- d. The total capacity (in number of fibers) of the utility hole(s), conduit, cable racking, and core drills used to install the fiberoptic cable from the POI(s) to the collocated equipment;
- e. Whether the utility hole(s), conduit, cable racking, and core drills used to install the fiberoptic cable is shared with fiber and/or power cables used by USWC and/or other carriers.

AT&T 2-035: RE: Collocation Cost Study  
Witness: Million

Qwest has contended in other proceedings that its direct costs used in the collocation cost studies are based on an analysis of 41 cageless collocation jobs. Is this true for the collocation study filed in this proceeding? If so, please produce the following:

- a. the CLLI, common name, and state of each central office in which a collocation job that was included in the sample was done;

- b. a copy of all invoices received by Qwest for each job; and
- c. a copy of all contracts between Qwest and any outside vendor who performed work on each job.

AT&T 2-036: RE: Collocation Cost Study  
Witness: Million

Please describe in detail each step required to accomplish the splicing set up as assumed in the collocation model.

AT&T 2-037: RE: Collocation Cost Study  
Witness: Million

Please describe in detail all elements included in the "per splice" and "per set-up" charges for fiber splicing set forth in the collocation model.

AT&T 2-038: RE: Collocation Cost Study  
Witness: Million

Please state why Qwest did not use any actual caged collocation jobs in determining direct collocation costs for the collocation study.

AT&T 2-039: RE: Collocation Cost Study  
Witness: Million

Please provide a floor plan, drawn to scale, for each Qwest central office in which a competing local exchange company has collocated equipment or has requested collocation in Arizona. Please indicate on each floor plan the space in which equipment is collocated, as well as the location of the DC power plant (including batteries and battery distribution fuse bays ("BDFBs")), fiber entrances into the central office, and cable vaults. In addition, please identify the location of all Qwest utility holes outside the central office and the distance from each utility hole to the corresponding fiber entrance(s) into the central office.

AT&T 2-040: RE: Collocation Cost Study  
Witness: Million

For each caged collocation arrangement that has been completed in Arizona since January 1, 2000, please provide the length of the ground cable between the floor ground and the collocation space.

AT&T 2-041: RE: Collocation Cost Study  
Witness: Million

For each collocation arrangement used in the cost study, please provide the length of the ground cable between the floor ground and the collocation space.

AT&T 2-042: RE: Collocation Cost Study  
Witness: Million

Please describe all adjustments made in Qwest's calculation of base rent for physical collocation to make the calculation specific to a central office located in Arizona.

AT&T 2-043: RE: Line Counts

For the State of Arizona, please provide the total voice equivalent lines and voice equivalent wireless channels Qwest provides to end users for voice telephone service as of March 31, 2001. If Qwest cannot provide this information for the identified time period, please provide the information for the most recent available time period.

AT&T 2-044: RE: Line Counts

For the State of Arizona, please provide the total voice equivalent lines and voice equivalent wireless channels that Qwest provides under a Total Service Resale agreement for voice telephone service as of March 31, 2001. If Qwest cannot provide this information for the identified time period, please provide the information for the most recent available time period.

AT&T 2-045: RE: Line Counts

For the State of Arizona, please provide the total voice equivalent lines and voice equivalent wireless channels Qwest provides under any other resale arrangement, such as resold Centrex, as of March 31, 2001. If Qwest cannot provide this information for the identified time period, please provide the information for the most recent available time period.

AT&T 2-046: RE: Line Counts

For the State of Arizona, please provide the total voice equivalent lines and voice equivalent wireless channels Qwest provides under a UNE loop arrangement where Qwest does not provide switching, using UNE loops, special access lines, and private lines connected to carriers as of March 31, 2001. If Qwest cannot provide this information for the identified time period, please provide the information for the most recent available time period.

AT&T 2-047: RE: Line Counts

For the State of Arizona, please provide the total voice equivalent lines and voice equivalent wireless channels Qwest provides under a UNE loop arrangement where Qwest also provides switching, using UNE loops, special access lines, and private lines connected to carriers as of March 31, 2001. If Qwest cannot provide this information for the identified time period, please provide the information for the most recent available time period.

AT&T 2-048: RE: Line Counts

In Arizona, how many UNE loops has Qwest sold that require central office demultiplexing.

AT&T 2-049: RE: UNE Competiveness

Please provide Qwest's monthly average Arizona revenue per line by residential and business customer in total and by revenue category for the most recent month available. The revenue categories should include: local exchange service, end user common line, intraLATA toll, intrastate switched access, interstate switched access and features. Also include all assumptions and methodology used in calculating the results.

AT&T 2-050: RE: Line Counts

Provide the following information, latest available, by wire center and by total study area for Qwest in Arizona. Please provide in electronic format.

- (a) Total Business Lines
- (b) Total Residential Lines
- (c) Special Access + Private Lines (DS0 equivalent basis)
- (d) Special Access + Private Lines (physical pair equivalent basis)
- (e) Public Lines
- (f) Other lines not included in the categories above (please specify)
- (g) Single Line Business Lines
- (h) Primary Residential Lines
- (i) Digital Subscriber Lines (either provided by Qwest or a competitor)
- (j) UNE Loops being purchased by CLECs
- (k) Resale Lines
- (l) Lines lost to facilities based competitors

AT&T 2-051: RE: Nonrecurring Cost Studies  
Witness: Million

Please provide all support documentation for the nonrecurring cost studies provided to AT&T by Qwest. This should include all documentation supporting the work activities, task times, or probabilities upon which its nonrecurring cost studies are based.

AT&T 2-052: RE: Nonrecurring Cost Studies  
Witness: Million

Regarding the nonrecurring cost studies presented by Qwest in this proceeding, please provide the following information:

- (a) for each time estimate used in the nonrecurring cost studies, please identify the subject matter expert who provided that time estimate, to the extent that that information is not included on the nonrecurring cost study documentation;
- (b) for each subject matter expert who provided time estimates for the nonrecurring cost studies, please provide all instructions given to the expert regarding how the time estimates provided by the expert should be derived and produce all documents setting forth such instructions;
- (c) describe in detail the basis for the time estimates provided by each subject matter expert, describe all information relied upon by the expert in developing the time estimates and produce all documents relied upon by the expert in developing those estimates.

AT&T 2-053: RE: Nonrecurring Cost Studies  
Witness: Million

Regarding the nonrecurring cost studies presented by Qwest in this proceeding, please provide the following information:

- (a) for each probability of manual work estimate used in the nonrecurring cost studies, please identify the subject matter expert who provided that time estimate, to the extent that that information is not included on the nonrecurring cost study documentation;
- (b) for each subject matter expert who provided probability of manual work estimates for the nonrecurring cost studies, please provide all instructions given to the expert regarding how the estimates provided by the expert should be derived and produce all documents setting forth such instructions;

(c) describe in detail the basis for the probability of manual work estimates provided by each subject matter expert, describe all information relied upon by the expert in developing the estimates and produce all documents relied upon by the expert in developing those estimates.

AT&T 2-054: RE: Nonrecurring Cost Studies  
Witness: Million

State whether Qwest has ever conducted any time and motion studies for ordering and provisioning activities, maintenance, central office installation activities, or field installation activities. If so, please produce all such studies.

AT&T 2-055: RE: Nonrecurring Cost Studies  
Witness: Million

Does Qwest have any standards or objectives established for its field technicians, central office technicians, or provisioning and service order employees regarding the time that should be required to accomplish any task? If so, please produce documents setting forth these standards or objectives.

AT&T 2-056: RE: Nonrecurring Cost Studies  
Witness: Million

Please describe all adjustments to work activities, time estimates, or probabilities of manual work estimates included within the nonrecurring cost studies presented in this proceeding to make those estimates forward looking.

AT&T 2-057: RE: Cost Studies  
Witness: Million

Please produce the annual cost factor book for Arizona and for Qwest.

AT&T 2-058: RE: Discovery from Other Parties

Please provide a copy of Qwest's responses to all discovery requests made to Qwest by any party other than AT&T in this docket.

AT&T 2 -059: RE: Cost Studies  
Witness: Million

Please provide the labor rate for the following job classifications. The rates provided should be "fully assigned" (that is, include wages and benefits for first-line supervision through third level management, as well as accounting for non-productive time, overtime pay, clerical support and other miscellaneous expenses).

If available, provide union contract labor rates.

- a) Business Dispatch Administration Center (BDAC)
- b) Consumer Dispatch Administration Center (CDAC)
- c) Circuit Provisioning Center (CPC)
- d) Frame Control Center (FCC)
- e) Facility Maintenance Administration Center (FMAC)
- f) Special Services Installation & Maintenance / Outside Plan (SSI&M / OSP)
- g) Loop Assignment Center (LAC)
- h) Network Terminal Equipment Center (NTEC)
- i) Recent Change Memory Administration Center (RCMAC)
- j) Switching Control Center (SCC)
- k) Special Service Center (SSC)
- l) Splicing
- m) InterLata Carrier Service Center (ICSC)

AT&T 2-060 RE: OSS  
Witness: Albersheim

Please provide the source for the statements attributed to Telcordia in fn. 15, p. 24 of the direct testimony of Renee Albersheim.

AT&T 2-061 RE: OSS  
Witness: Albersheim

Please provide all contracts with Telcordia under which Telcordia performed the work described in the testimony of Renee Albersheim.

AT&T 2-062 RE: Loop Pricing  
Witness: Buckley

Please identify each input from the HAI Model 5.0(a) that have been "revised and more closely reflect those utilized in the Loop Mod program" as stated in the direct testimony of Dick Buckley at p. 10.

AT&T 2-063            RE: Loop Pricing  
                          Witness: Buckley

Please provide all documents that show how the comparative investments listed at pp. 9 and 10 of Mr. Buckley's direct testimony were calculated.

AT&T 2-064            RE: Loop Pricing  
                          Witness: Buckley

Please produce the current network contracts with vendors who perform placement of buried plant in Arizona referenced at p. 13, l. 5 and 6 of the direct testimony of Dick Buckley.

AT&T 2-065            RE: Loop Pricing  
                          Witness: Buckley

Please provide all documentation of interviews with field engineers upon which the placement activities used in LoopMod are based as stated in the direct testimony of Dick Buckley at p. 20, l. 12-13.

AT&T 2-066            RE: Loop Pricing  
                          Witness: Buckley

Please provide all documentation from the Omaha Broadband Trial upon which QWEST relies to support its placement activities inputs in Loop Mod as stated in Mr. Buckley's testimony at p. 20, l. 14-19. This includes all documents describing the placement activities used or considered for use in the Broadband Trial, documents setting for the reasons for using those placement activities, or documents analyzing the costs of activities considered for use in the Trial.

AT&T 2-067            RE: Loop Pricing  
                          Witness: Buckley

Please produce the most recent documentation available of Qwest's actual loop placement activities in the state of Arizona. This should include documents indicating the extent to which Qwest uses trenching, directional boring, plowing, and other placement activities assumed in LoopMod to place loop facilities in the state of Arizona.

AT&T 2-068 RE: Loop Pricing  
Witness: Buckley

Please provide all documentation of the interview with representatives of a cable telephone company in Bismarck, North Dakota, described at p. 21 of Mr. Buckley's testimony.

AT&T 2-069 RE: Loop Pricing  
Witness: Buckley

Please produce the article identified at p. 22 of Mr. Buckley's testimony, l. 4-6.

AT&T 2-070 RE: Loop Pricing  
Witness: Buckley

Please provide the QWEST buried placement records cited by Mr. Buckley at p. 27, l. 11-12 of his direct testimony.

AT&T 2-071 RE: Loop Pricing  
Witness: Buckley

Please provide the most recent information available to QWEST regarding the percentage of aerial cable, building cable, underground cable, buried cable, and submarine cable in place in Arizona.

AT&T 2-072 RE: Loop Pricing  
Witness: Buckley

Please provide the surveys of existing drops in New Mexico, North Dakota, Minnesota and Wyoming referenced at p. 3 of 18 of Exhibit RJB-3.

AT&T 2-073 RE: Loop Pricing  
Witness: Buckley

Please provide the most recent information available regarding Qwest's actual drop lengths presently existing in Arizona.

AT&T 2-074 RE: Loop Pricing  
Witness: Buckley

Please provide the contracts referenced at p. 4 of 18 of Exhibit RJB-3.

AT&T 2-075            RE: Loop Pricing  
                          Witness: Buckley

Please provide all information supporting the material costs referenced at pp. 9, 10, 11 and 12 of Exhibit RJB-3.

AT&T 2-076            RE: Loop Pricing  
                          Witness: Buckley

Please produce the "latest contracts QWEST has with outside vendors for the provisioning of drop facilities" referenced at Exhibit RJB-3, p. 13 of 18.

AT&T 2-077            RE: Loop Pricing  
                          Witness: Buckley

Please provide all documents that support the "latest prices for fiber optic equipment listed on Exhibit RJB-3 at p. 15 of 18.

AT&T 2-078            RE: Loop Pricing  
                          Witness: Buckley

Provide all documentation and other evidence supporting the statement at p. 4 of Mr. Buckley's testimony that "the use of aerial plant has generally been on the decline in recent years." Explain specifically how the amount of aerial plant installed by Qwest in Arizona has varied each year from 1991 to 2000, inclusive. Express the results as a fraction of total route-miles of plant installed over the time period.

AT&T 2-079            RE: Loop Pricing  
                          Witness: Buckley

Explain in detail the statement at p. 5 of Mr. Buckley's testimony that "[e]ach route in each wire center is analyzed to determine the amount of demand and the distance that demand is from the serving central office." Describe the underlying subscriber demand data on which the analysis is based and describe the analysis itself.

AT&T 2-080            RE: Loop Pricing  
                          Witness: Buckley

Explain in detail the statement at p. 6 of Mr. Buckley's testimony that "Qwest developed distribution plant profiles based on the Qwest Network distribution architectures." Describe the

underlying subscriber demand data on which the analysis is based and describe the analysis itself. Explain specifically the details of the industry "serving area concept" and describe how the "guidelines" for these "architectures" conform to the serving area concept design.

AT&T 2-081            RE: Loop Pricing  
                          Witness: Buckley

Are results (final, intermediate, derived) from the Benchmark Cost Proxy Model (BCPM) used in any way in LoopMod version2? If so, explain in detail what results are used and how they are applied to LoopMod.

AT&T 2-082            RE: Loop Pricing  
                          Witness: Buckley

Provide a complete listing of the user-adjustable inputs to the "Revised HAI Model 5.0a" that produced the \$872 loop investment listed at p 9 of Mr. Buckley's testimony. Provide a complete copy on CD of all of the HAI Model version 5.0a modules used to produce these results. These modules must include the Distribution Module, Feeder Module, Switching and Interoffice Module, and the Density Zone and Wire Center Expense Modules, as well as the complete set of database tables contained in the hm.mdb file.

AT&T 2-083            RE: Loop Pricing  
                          Witness: Buckley

Explain in detail each of the "certain modifications [to LoopMod]" that were made "to ensure compliance with TELRIC guidelines" made by LECG as noted at p. 9 of Mr. Buckley's testimony. Explain how and to what extent each of these modifications affected the magnitude of LoopMod's average per-loop investment.

AT&T 2-084            RE: Cost Models  
                          Witness: Million

Please identify the QWEST employee most knowledgeable regarding the development of the Switching Cost Model.

AT&T 2-085            RE: Cost Models  
                          Witness: Million

Please identify the QWEST employee most knowledgeable regarding the inputs used in the Switching Cost Model.

AT&T 2-086            RE: Cost Models  
                          Witness: Million

Please produce the actual vendor contracts negotiated by QWEST with switch vendors referenced at p. 18, l. 12-15 of the direct testimony of Theresa K. Million.

AT&T 2-087            RE: Cost Models  
                          Witness: Million

Please identify the QWEST employee most knowledgeable regarding development of the Transport Module.

AT&T 2-088            RE: Cost Models  
                          Witness: Million

Please identify the QWEST employee most knowledgeable regarding the inputs to the Transport Module.

AT&T 2-089            RE: Cost Models  
                          Witness: Million

Please produce the information from the TIRKS database used by QWEST in developing the utilization factors for the Transport Module as discussed in the direct testimony of Theresa K. Million at p. 21, l. 1-13.

AT&T 2-090            RE: Cost Models  
                          Witness: Million

Please produce the vendor contracts and price lists relied upon in developing the default material investments used in the Transport Module as stated in the direct testimony of Theresa K. Million at p. 21, l. 14-17.

AT&T 2-091            RE: Cost Models  
                          Witness: Million

Please identify the engineers who provided information used by QWEST in determining the material investments for standard transport configurations as stated in the direct testimony of Theresa K. Million at p. 21, l. 17-20. In addition, please produce all information upon which these engineers relied in estimating the material investments and produce all documents generated by these engineers for use in the Transport Module.

AT&T 2-092            RE: Cost Models  
                          Witness: Million

Please produce the actual vendor contracts and price lists identified in the direct testimony of Theresa K. Million at I. 3-4.

AT&T 2-093            RE: Cost Models  
                          Witness: Million

Please produce the wage and salary index prepared by Joel Popkin & Company referenced at p. 25 of the direct testimony of Theresa K. Million. Also produce all documents provided by QWEST to Joel Popkin & Company for use in preparing the wage and salary index as well as all other documents reviewed or relied upon by Joel Popkin & Company in preparing the wage and salary index.

AT&T 2-094            RE: Cost Models  
                          Witness: Million

Who calculated the cost savings value input described at p. 25 of the direct testimony of Theresa K. Million? Please produce all documents setting forth the FCC, AT&T and the USTA X-factor productivity estimates used in calculating the cost savings value.

AT&T 2-095            RE: Cost Studies  
                          Witness: Million

For each of the following services or products, please list the vendors and/or suppliers used by Qwest, the price Qwest receives for each service or product, and the discount (if any) that Qwest receives:

- (a) 89 blocks
- (b) 410 blocks
- (c) DSX-1 panels
- (d) DSX-3 panels
- (e) DS0, DS1 and DS3 cables used in a Central Office
- (f) fiber optics cable (fire retardant) used in the Central Office
- (g) splice enclosure/case
- (h) fiber distribution panel
- (i) DC power cable (all sizes used in the Central Office)
- (j) battery distribution fuse bay
- (k) rectifier
- (l) power distribution board
- (m) grounding wire (all sizes used in the Central Office)
- (n) lugs

- (o) H-taps
- (p) fencing
- (q) cage ground bar
- (r) AC outlets and wiring
- (s) Lighting

AT&T 2-096            RE: Cost Models  
                          Witness: Million

For each of the services and products listed in Data Request AT&T 2-095, please identify the installation contractors used in Arizona when Qwest does not self-provision installation.

AT&T 2-097            RE: Cost Models  
                          Witness: Million

Please list the number of central offices in AZ by tier (Tier 1, Tier 2, etc.) and indicate the number in each tier deploying a COSMIC frame and the number deploying an MDF.

AT&T 2-098            RE: Cost Models  
                          Witness: Million

For each central office in Arizona, is the intermediate frame (if any) used by collocators the same intermediate frame used by Qwest for provisioning its services?

AT&T 2-099            RE: Cost Models  
                          Witness: Million

Does Qwest's architecture traverse either (a) an intermediate frame and an MDF or (b) multiple intermediate frames and a COSMIC frame for a single circuit?

AT&T 2-100            RE: Cost Models  
                          Witness: Million

Please list the date of installation for each COSMIC frame in AZ.

AT&T 2-101            RE: Cost Models  
                          Witness: Million

For each central office in AZ (identified by CLLI and Qwest name) provide:

- (a) the current number of physical caged collocation arrangements
- (b) the current number of physical cageless collocation arrangements
- (c) the current number of virtual collocation arrangements
- (d) the expected number of physical caged collocation arrangements as of 30 June 2001
- (e) the expected number of physical cageless collocation arrangements as of 30 June 2001
- (f) the expected number of virtual collocation arrangements as of 30 June 2001

AT&T 2-102            RE: Cost Models  
                          Witness: Million

Please provide any and all documentation supporting Qwest's assumed distances for DS0, DS1 and DS3 cable lengths in its collocation model.

AT&T 2-103            RE: Cost Models  
                          Witness: Million

Please provide any and all documentation supporting Qwest's assumptions for rent in its collocation model.

AT&T 2-104            RE: Cost Models  
                          Witness: Million

Please describe, in detail, all assumptions underlying Qwest's cost of engineering in its collocation model. Include, by element (cable racking, cable runs, etc), a breakout of the engineering costs, either in dollar amounts or hours required. Also, provide the assumed hourly rate for engineering.

AT&T 2-105            RE: Cost Models  
                          Witness: Million

For any actual engineering jobs that were used as a basis for Qwest's assumptions in its collocation model, please provide the following:

- (a) the number of hours of engineering required
- (b) the hourly rate for engineering

AT&T 2-106:            RE: Updated Discovery

Please review Qwest's responses to Data Requests AT&T 1-001 to AT&T 1-021. To the extent that Qwest's answers are in any respect inaccurate or require updating, please provide the necessary corrections and updates.

AT&T 2-107            RE: LoopMod  
                          Witness: Buckley

Provide all documentation supporting the statement at p. 27 of Mr. Buckley's testimony that, "[b]ased on data from Qwest buried placement records, for the years 1995 to 1999, Qwest has been able to share trench for approximately 18% of the buried sheath footage placed." Explain the relationship between buried sheath footage and buried route footage, calculate the trench sharing fraction expressed as a percentage of buried route footage, and supply all underlying documentation for this calculation.

AT&T 2-108            RE: LoopMod  
                          Witness: Buckley

Identify and provide the report referred to at p. 29 of Mr. Buckley's testimony: "Data from an August 2000 report shows *[sic]* that aerial comprises 13.8% of the total sheath miles for aerial and buried cable."

AT&T 2-109            RE: LoopMod  
                          Witness: Overton

In reference to the cost sharing discussion at pp. 12-13 of Mr. Overton's testimony, describe every instance over the past five years in which Qwest in Arizona has shared trenches, boring machine capacity, ducts, or any other non-aerial structure or cable placing investment with any other telecommunications carrier, such as cable television companies, Level 3, or any similar company.

AT&T 2-110            RE: LoopMod  
                          Witness: Overton

Provide all supporting documentation for the statement at p. 13 of Mr. Overton's testimony that aerial cable constitutes "approximately 17% of the total cable footage" in Arizona. Also, explain the relationship between cable footage and route footage.

AT&T 2-111            RE: LoopMod  
                          Witness: Overton

Explain why the costs for plant construction used in the Omaha broadband network trial are not used in Qwest's current cost studies, even though the Omaha construction methods influenced those represented in Qwest's ICM LoopMod.

AT&T 2-112

RE: LoopMod

Witness: Overton

With respect to the statement at p. 17 of Mr. Overton's testimony that "[t]he majority of joint trenching opportunities was [*sic*] in new developments," explain the number of new developments in Arizona that Qwest has equipped for telephone service over the past five years and, for each new development, explain to what extent the subdivision developer participated in the construction of telephone plant. Also, for each new development, state whether the land developer, real estate company, or any other entity was required by Qwest to guarantee a specific level of telephone subscriber demand over a specific time period and what financial penalties the entity faced if the stated demand was not met.

## CERTIFICATE OF SERVICE

ACC Docket No. T-00000A-00-0194

I hereby certify that on the 11<sup>th</sup> day of April 2001, a copy of *AT&T's Second Set of Data Requests to Qwest Corporation*, in the above-named docket, was sent via FedEx next business morning delivery to:

Kathryn E. Ford Qwest Corporation 1801 California Street, Suite 4900 Denver, CO 80202	Timothy Berg Theresa Dwyer Fennemore Craig, P.C. 3003 North Central Avenue, Suite 2600 Phoenix, AZ 85012-2913
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And a true and correct copy of the foregoing was sent via First Class U.S. Mail to:

Maureen Scott ACC – Legal Division 1200 W. Washington Street Phoenix, AZ 85007	William Dunkel Dunkel and Associates 8625 Farmington Cemetery Road Pleasant Plains, IL 62677
Jane Rodda Acting Chief Administrative Law Judge Hearing Division Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007	Deborah Scott, Director ACC – Utilities Division 1200 W. Washington Street Phoenix, AZ 85007
William Mundell, Chairman Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007	Jerry Porter Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007
James M. Irvin, Commissioner Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007	Patrick Black Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007
Marc Spitzer, Commissioner Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007	Hercules Alexander Dellas Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007

<p>Steven J. Duffy Ridge &amp; Isaacson, P.C. 3101 North Central Avenue, Ste. 1090 Phoenix, AZ 85012-2638</p>	<p>Gary L. Lane 6902 E. 1<sup>st</sup> Street, Suite 201 Scottsdale, AZ 85251</p>
<p>K. Megan Doberneck Gallagher &amp; Kennedy 2575 E. Camelback Road Phoenix, AZ 85016-9225</p>	<p>Thomas H. Campbell Lewis &amp; Roca 40 N. Central Avenue Phoenix, AZ 85007</p>
<p>Scott S. Wakefield Residential Utility Consumer Office 2828 N. Central Avenue, Suite 1200 Phoenix, AZ 85004</p>	<p>Rex M. Knowles NEXTLINK Arizona, Inc. 111 E. Broadway, Suite 1000 Salt Lake City, UT 84111</p>
<p>Michael W. Patten Brown &amp; Bain P.O. Box 400 Phoenix, AZ 85001-0400</p>	<p>Joan S. Burke Osborn Maledon, P.A. 2929 North Central Avenue, 21<sup>st</sup> Floor Phoenix, AZ 85012-2794</p>
<p>Thomas F. Dixon, Jr. WorldCom 707 17<sup>th</sup> Street Denver, CO 80202</p>	<p>Richard L. Sallquist Sallquist &amp; Drummond 2525 E. Arizona Biltmore Circle Phoenix, AZ 85016</p>
<p>Kath Thomas Advance TelCom Group, Inc. 100 Stoney Point Rd., Suite 130 Santa Rosa, CA 95401</p>	<p>Darren S. Weingard Stephen H. Kukta Sprint Communications Co. 1850 Gateway Drive, 7<sup>th</sup> Floor San Mateo, CA 94404-2467</p>
<p>David R. Conn McLeodUSA Telecommunications Services 6400 C Street, S.W. Cedar Rapids, IA 52406</p>	<p>Jon Poston Arizonans for Competition in Telephone Service 6733 E. Dale Lane Cave Creek, AZ 85331-6561</p>

<p>Douglas Hsiao Rhythms Links, Inc. 9100 E. Mineral Circle Englewood, CO 80112</p>	<p>Diane Bacon Communications Workers of America 5818 N. 7<sup>th</sup> Street, Suite 206 Phoenix, AZ 85014-5811</p>
<p>Deborah A. Verbil Senior Counsel SBC Telecom, Inc. 5800 Northwest Parkway, Suite 125 Room 1-T-20 San Antonio, TX 78249</p>	<p>Raymond S. Heyman Randy Warner Roshka Heyman &amp; DeWulf, PLC Two Arizona Center, Suite 1000 400 North 5<sup>th</sup> Street Phoenix, AZ 85004</p>
<p>Penny Bewick New Edge Networks, Inc. P.O. Box 5159 3000 Columbia House Blvd., Suite 106 Vancouver, WA 98668</p>	<p>Andrea Harris, Senior Manager Allegiance Telecom Inc. of Arizona 2101 Webster, Suite 1580 Oakland, California 94612</p>
<p>Carrington Phillip Cox Arizona Telecom, Inc 1400 Lake Hearn Drive, Atlanta, GA 30319</p>	<p>Timothy Peters Electric Lightwave, Inc. 4400 N.E. 77<sup>th</sup> Avenue Vancouver, WA 98662</p>
<p>Jeffrey W. Crockett Snell &amp; Wilmer LLP One Arizona Center Phoenix, AZ 85004-2202</p>	<p>Marti Allbright MPower Communications Corp. 5711 South Benton Circle Littleton, CO 80123</p>
<p>Michael B. Hazzard Kelley, Drye &amp; Warren 1200 19<sup>th</sup> Street, NW, 5<sup>th</sup> Floor Washington, DC 20036</p>	<p>Steve Sager McLEODUSA Telecommunications Services, Inc. 215 South State Street, 10<sup>th</sup> Floor Salt Lake City, UT 84111</p>
<p>Janet Livengood Z-Tel Communications, Inc. 601 South Harbour Island Blvd. Suite 220 Tampa, FL 33602</p>	<p>Teresa Tan WorldCom, Inc. 201 Spear Street, Dept 9976 San Francisco, CA 94105</p>

Dennis D. Ahlers Eschelon Telecom, Inc. 730 Second Avenue South, Suite 1200 Minneapolis, MN 55402	
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Dated this April 11, 2001

by Jamy Weather

**B**

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-035S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 035S1

RE: Collocation Cost study  
Witness: Million

Qwest has contended in other proceedings that its direct costs used in the collocation cost studies are based on an analysis of 41 cageless collocation jobs. Is this true for the collocation study filed in this proceeding? If so, please produce the following:

- a. the CLLI, common name, and state of each central office in which a collocation job that was included in the sample was done;
- b. a copy of all invoices received by Qwest for each job; and
- c. a copy of all contracts between Qwest and any outside vendor who performed work on each job.

RESPONSE:

- a. See Confidential Attachment A.
- b. See Confidential Attachment A in response to AT&T 02-104.

Respondent: Jennifer Peppers, Cost Interface Manager, QWEST Corporation

(c) Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Respondent: Legal

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Respondent: Jennifer Peppers

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-064S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 064S1

RE: Loop Pricing  
Witness: Buckley

Please produce the current network contracts with vendors who perform placement of buried plant in Arizona referenced a p.13,1.5 and 6 of the direct testimony of Dick Buckley.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Scott Weakley, Capacity Planner, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-074S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 074S1

RE: Loop Pricing  
Witness: Buckley

Please provide the contracts referenced at p.4 of 18 of Exhibit RJB-3.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Scott Weakley, Capacity Planner, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-074

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 074

RE: Loop Pricing  
Witness: Buckley

Please provide the contracts referenced at p.4 of 18 of Exhibit RJB-3.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Scott Weakley, Capacity Planner, Qwest

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-075S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 075S1

RE: Loop Pricing  
Witness: Buckley

Please provide all information supporting the material costs referenced at pp. 9,10,11 and 12 of Exhibit RJB-3.

RESPONSE:

Please see response to ATT 002-074.

Scott Weakley, Capacity Planner, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-076S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 076S1

RE: Loop Pricing  
Witness: Buckley

Please produce the "latest contracts QWEST has with outside vendors for the provisioning of drop facilities" referenced at Exhibit RJB-3, p.13 of 18.

RESPONSE:

Please see response to ATT 002-074.

Scott Weakley, Capacity Planner, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-077S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 077S1

RE: Loop Pricing  
Witness: Buckley

Please provide all documents that support the "latest prices for fiber optic equipment listed on Exhibit RJB-3 at p. 15 of 18.

RESPONSE:

Please see response to ATT 002-074.

Scott Weakley, Capacity Planner, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-086S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 086S1

RE: Loop Pricing  
Witness: Buckley

Please produce the actual vendor contracts negotiated by QWEST with switch vendors referenced at p.18,1. 12-15 of the direct testimony of Theresa K. Million.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-090S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 090S1

RE: Loop Pricing  
Witness: Buckley

Please produce the vendor contracts and price lists relied upon in developinQ  
the default material investments used in the Transport Module as stated in  
the direct testimony of Theresa K. Million at p. 21.1. 14-17.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary  
business information involving a third party. The foregoing notwithstanding,  
Qwest is in the process of seeking vendor permission to provide this  
information.

Respondent: Legal

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-091S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 091S1

RE: Loop Pricing  
Witness: Buckley

Please identify the engineers who provided information used by QWEST in determining the material investments for standard transport configurations as stated in the direct testimony of Theresa K. Million at p. 21, 1. 17-20. In addition, please produce all information upon which these engineers relied in estimating the material investments and produce all documents generated by these engineers for use in the Transport Module.

RESPONSE:

The engineer who provided the information was Network Staff Engineer Dave Younie. As to the information this engineer relied on, Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #092.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-092S3

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 092S3

RE: Loop Pricing  
Witness: Buckley

Please produce the actual vendor contracts and price lists identified in the direct testimony of Theresa K. Million at 1.3-4.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 06/07/01:

Confidential Attachment A contains contracts between Qwest and various vendors and is provided pursuant to the Confidentiality Agreement in this proceeding. Qwest will continue to provide additional contracts as vendors grant permission for Qwest to do so. Per vendor request, some identifying information has been redacted before providing the contract for your review. However, the information requested by you for cost information is still contained within the un-redacted portion of the contracts.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 06/29/01

Confidential Attachment A contains contracts between Qwest and various vendors and is provided pursuant to the Confidentiality Agreement in this proceeding. Qwest will continue to provide additional contracts as vendors grant permission for Qwest to do so. Per vendor request, some identifying information has been redacted before providing the contract for your review. However, the information requested by you for cost information is still contained within the un-redacted portion of the contracts.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 07/09/01

Confidential Attachment A contains a contract between Qwest and a vendor and is provided pursuant to the Confidentiality Agreement in this proceeding. Qwest will continue to provide additional contracts as vendors grant permission for Qwest to do so. Per vendor request, some identifying information has been redacted before providing the contract for your review. However, the information requested by you for cost information is still contained within the un-redacted portion of the contracts.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-095S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 095S1

RE: Loop Pricing  
Witness: Buckley

For each of the following services or products, please list the vendors and/or suppliers used by Qwest, the price Qwest receives for each service or product, and the discount (if any) that Qwest receives:

- (a) 89 blocks
- (b) 410 blocks
- (c) DSX-1 panels
- (d) DSX-3 panels
- (e) DSO, DS1 and DS3 cables used in a Central Office
- (f) fiber optics cable (fire retardant) used in the Central Office
- (g) splice enclosure/case
- (h) fiber distribution panel
- (i) DC power cable (all sizes used in the Central Office)
- (j) battery distribution fuse bay
- (k) rectifier
- (l) power distribution board
- (m) grounding wire (all sizes used in the Central Office)
- (n) lugs

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Respondent: Scott Weakley, Capacity Planner, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #92.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 002-096S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 096S1

RE: Loop Pricing  
Witness: Buckley

For each of the services and products listed in Data request AT&T 2-095, please identify the installation contractors used in Arizona when Qwest does not self-provision installation.

RESPONSE:

Qwest states that the information will be provided when permission from the vendors is granted.

Respondent: Scott Weakley, Capacity Planner, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #92.

**C**

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 117S1

Please refer to PROPRIETARY Exhibit RJB-3 filed by Qwest as an exhibit to the testimony of Mr. Buckley on March 30, 2001 and respond to the following:

- a. Please produce the "Utilize" database to which reference is made at page 2 of the subject exhibit. In addition, please produce all documents from which the database is derived and explain how the database is used in LoopMod.
- b. Please produce the "IFT" database to which reference is made at page 2 of the subject exhibit. In addition, please produce all documents from which the database is derived and explain how the database is used in LoopMod.
- c. Describe and explain the computation performed to produce the "Percentages" that are shown in the table titled "Density Group Specific" at page 2 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support the assumptions used in making the computation.
- d. Describe and explain the computations performed to produce the "Idle Dedicated Distribution Fill Percentage" (4.00%) at page 2 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support the assumptions used in making the computation.
- e. Describe and explain the computations performed to produce the "Additional Lines Distribution Fill Percentage (17.12%) at page 2 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support the assumptions used in making the computation.
- f. Describe and explain the development of the 80 percent "Feeder Fill for Copper Cable" shown at page 3 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support Qwest's use of this input or assumption in developing unbundled loop costs.
- g. Describe and explain the development of the "Average Aerial and Buried Drop Lengths" by "Density Group" as shown at page 3 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support Qwest's use of these inputs or assumptions in developing unbundled loop costs.
- h. Describe and explain the development of each of the "placement costs" to which reference is made at page 4 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support Qwest's use of these inputs or assumptions in developing unbundled loop costs.
- i. Provide a complete and legible copy of all contracts to which reference is made under the heading titled "Support" on page 4 of the subject exhibit.
- j. Describe and explain the development of the "Default values" for "Placement Percentages - Distribution" and "Placement Percentages - Feeder" as shown at page 5 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support Qwest's use of these inputs

or assumptions in developing unbundled loop costs.

k. Provide a complete and legible copy of any and all documents from which data were "drawn from Qwest experience in placing plant for the Broadband trial in Omaha, NE" as reported at page 5 of the subject exhibit.

l. Provide a complete and legible copy of any and all documents from the "citywide CATV rebuild in one of the states within the Qwest region" that were used, in whole or in part, as "support to the utilization of boring in mature areas" as discussed at page 5 of the subject exhibit

m. Provide a complete and legible copy of any and all construction handbooks, manuals, and other documents that are used currently by Qwest contract and "in-house" cable placement personnel to guide them in placing loop feeder and distribution cable in Arizona.

n. Describe and explain the development of each of the "Default values" for "Sharing Percentages" as shown at page 5 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support Qwest's use of these inputs or assumptions in developing unbundled loop costs.

o. Describe and explain the development of the "Default values" of "Cost" for each "Buried Copper Cables & Stubs" listed at page 7 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support Qwest's use of these inputs or assumptions in developing unbundled loop costs.

p. For each type of buried cable (i.e., pair size and gauge) shown in the listing of cables on page 7 of the subject exhibit, provide the designation(s) for the cable as it (they) would appear in Qwest's Continuing Property Records ("CPR") for Arizona.

q. Provide a complete and legible copy of the actual printout(s) from the Qwest Arizona CPR sheets (schedules, etc.) that pertain to the MOST RECENTLY COMPLETED Arizona work order in connection with which each type of cable shown in the listing on page 7 of the subject exhibit were placed.

r. Describe and explain Qwest's selection of 30 ft. as the average length of "stub" cable as shown at page 7 of the subject exhibit. In addition, please produce all studies, analyses and other documents that support Qwest's use of this input or assumption in developing unbundled loop costs.

s. For each type of underground cable (i.e., pair size and gauge) shown in the listing of cables on page 8 of the subject exhibit, provide the designation(s) for the cable as it (they) would appear in Qwest's Continuing Property Records ("CPR") for Arizona.

t. Provide a complete and legible copy of the actual printout(s) from the Qwest Arizona CPR sheets (schedules, etc.) tat pertain to the MOST RECENTLY COMPLETED Arizona work order in connection with which each type of cable shown in the listing on page 8 of the subject exhibit were placed.

u. For each type of building copper cable (i.e., pair size and gauge) and inside terminal shown in the listing of cables on page 9 of the subject exhibit, provide the designation(s) for the cable/terminal as it (they) would appear in Qwest's Continuing Property Records ("CPR") for Arizona.

v. Provide a complete and legible copy of the actual printout(s) from the Qwest Arizona CPR sheets (schedules, etc.) that pertain to the MOST RECENTLY COMPLETED Arizona work order in connection with which each type of cable/terminal shown in the listing on page 9 of the subject exhibit were

placed.

w. For each type of aerial copper cable (i.e., pair size and gauge) and terminal shown in the listing of cables on page 10 of the subject exhibit, provide the designation(s) for the cable/terminal as it (they) would appear in Qwest's Continuing Property Records ("CPR") for Arizona.

x. Provide a complete and legible copy of the actual printout(s) from the Qwest Arizona CPR sheets (schedules, etc.) that pertain to the MOST RECENTLY COMPLETED Arizona work order in connection with which each type of cable/terminal shown in the listing on page 10 of the subject exhibit were placed.

y. For each type of buried fiber cable (i.e., number of fibers) and shown in the listing of cables on page 11 of the subject exhibit, provide the designation(s) for the cable as it (they) would appear in Qwest's Continuing Property Records ("CPR") for Arizona.

z. Provide a complete and legible copy of the actual printout(s) from the Qwest Arizona CPR sheets (schedules, etc.) that pertain to the MOST RECENTLY COMPLETED Arizona work order in connection with which each type of cable shown in the listing on page 11 of the subject exhibit were placed.

aa. For each type of underground fiber cable (i.e., number of fibers) and shown in the listing of cables on page 12 (par. 8.6) of the subject exhibit, provide the designation(s) for the cable as it (they) would appear in Qwest's Continuing Property Records ("CPR") for Arizona.

bb. Provide a complete and legible copy of the actual printout(s) from the Qwest Arizona CPR sheets (schedules, etc.) that pertain to the MOST RECENTLY COMPLETED Arizona work order in connection with which each type of cable shown in the listing on page 12 (par. 8.6) of the subject exhibit were placed.

cc. For each type of building fiber cable (i.e., number of fibers) and shown in the listing of cables on page 12 (par. 8.7) of the subject exhibit, provide the designation(s) for the cable as it (they) would appear in Qwest's Continuing Property Records ("CPR") for Arizona.

dd. Provide a complete and legible copy of the actual printout(s) from the Qwest Arizona CPR sheets (schedules, etc.) that pertain to the MOST RECENTLY COMPLETED Arizona work order in connection with which each type of cable shown in the listing on page 12 (par. 8.7) of the subject exhibit were placed.

ee. Provide a complete and legible copy of the "guidelines from the Qwest network group" to which reference is made at page 16 of the subject exhibit.

ff. Describe and explain specifically why "minimizing construction expenditures" (paragraph designated "Support" at page 16 of the subject exhibit) as opposed to minimizing overall costs was the impetus behind Qwest's selection of the 12Kft Crossover.

gg. Describe and explain the extent to which the minimization of overall costs was considered as an element in Qwest's decision to select 12Kft. For the crossover as discussed at page 16 of the subject exhibit.

hh. Provide a complete and legible copy of page 17 of 18 and page 18 of 18 to the subject exhibit.

ii. Provide a complete and legible copy of any and all studies, surveys reports, analyses, etc. along with any and all related documentation used by Qwest to develop each of the "Costs" that appear in the table of "Default

values" shown on page 13 of the subject exhibit.

jj. Provide a schedule(s) which shows the name of the manufacturer, the manufacturer's designation (name, brand name, etc.), the manufacturer's part number, the Qwest part number for each and every pedestal terminal, encapsulated splice terminal, Subscriber Area Interface ("SAI") and splice closure that was used in developing the "Costs" shown on page 14 (paragraph 8.9) of the subject exhibit.

kk. Provide a schedule which shows, for each and every pedestal terminal, encapsulated splice terminal, Subscriber Area Interface ("SAI") and splice closure that was used in developing the "Costs" shown on page 14 (paragraph 8.9) of the subject exhibit, the most current material price paid for the item by Qwest.

ll. Provide a schedule(s) that shows the development of the "Costs" for "C-Rural Wire" shown at paragraph 8.10 on page 14 of the subject exhibit.

mm. For each and every item of "Fiber Optic Equipment" listed on page 15 of the subject exhibit, provide:

(1) a list which shows the name of the manufacturer(s) for the equipment upon which the "Costs" estimates shown on page 15 are based;

(2) for each manufacturer identified in "mm(1)" above, identify each item of that manufacturer's equipment (manufacturer's designation for the item, such as "equipment shelf," "line card", etc; the manufacturer's part number for the item of equipment; etc.), and Qwest's actual material price paid for that item of equipment as that price is most recently reflected in Qwest's CPR records;

(3) for each item of equipment identified in "mm(2)" above, state Qwest's actual fully-loaded installation labor cost as that cost is most recently reflected in Qwest's CPR records; and

(4) For each item of equipment identified in "mm(2)" above, state Qwest's actual other capitalized cost (list, in detail -- for example, capitalized sales taxes) as that cost is most recently reflected in Qwest's CPR records.

RESPONSE:

a. Please see Confidential Attachment A, the spreadsheet "utilize99 idle dedicated.xls". This data is used to provide support for the assumption that, on average, 4% of the primary lines will be idle (not in service). The idle dedicated is calculated by subtracting the additional line count from both the working and assigned quantities. The difference between the assigned lines and the working lines is then divided by the assigned. This calculation yields the percentage of the assigned lines that are idle dedicated (i.e. primary lines left in place at a temporarily vacant location). Confidential Attachment A is provided pursuant to the Confidentiality Agreement in this proceeding.

b. Please see the attached spreadsheet, Confidential Attachment B "IFT Oct98 adl rpt.xls". The IFT line count information is used to determine the line counts for primary and additional lines and calculate the additional line percentage. That percentage is used in the Unit calculation to determine distribution divisor.

c. The derivation of the "Percentages" column on the Density Group Specific matrix is explained in the "Support" paragraph. The default input fills for distribution are used for cable sizing. An input of 50% will size cable for two pairs per location and a 33% input will size cable for three pairs per

location. There are no formal documents supporting the percentages. They are simply calculated by dividing 1 by 2 (50%) or dividing 1 by 3 (33%)

d. Please see the response to AT&T set 3 No. 117 a.

e. Please see the response to AT&T set 3 No. 117 b.

f. Please see page 56 of Attachment C, the file "7\_HMSOA\_HIP.doc"

g. The drop length default inputs for LoopMod v2.0 are Subject Matter Expert estimates of the average drop lengths for the three LoopMod V2.0 distribution designs that utilize drop wires to serve individual end-user locations. Studies provided in response to data request 072 in APT Set 2 show that the mean drop lengths are approximately 140 to 200 feet. The inputs for LoopMod V2.0 are conservative average estimates in that they produce average lengths across Qwest's fourteen states of 94 to 146 feet.

h. Please see Confidential Attachment D spreadsheet "Placement formulas.xls". The cost inputs to the formulas come from contracts Qwest has with outside plant construction firms operating in Arizona.

i. Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

j. Please see the response to AT&T Set 2 No. 065. The percentages developed from those discussions were a starting point for the default placement inputs. The deaveraged LoopMod placement percentages used that starting point and were adjusted to reflect the methods that would likely be employed with the varying levels of density and development depicted in the distribution designs.

k. Please see the response to AT&T Set 2 No. 066.

l. Please see the response to AT&T Set 2 No. 068.

m. Qwest is not in possession or control of any handbooks, manuals, or documents relating to cable placement that are used by outside contractors. To the limited extent that Qwest relies on in-house personnel to place cable, those individuals use industry-wide Bell System standards for cable placement.

n. Please see the response to AT&T Set 2 No. 070. Based on data from these placement records, for the years 1995 to 1999, Qwest has been able to share trench for approximately 18% of the buried sheath footage placed. This figure compares with the 20% being utilized as the recommended buried sharing percentage in the Qwest ICM. The actual data is optimistic, as it reflects the placement activities in a growth environment, not the mix that would be achieved in a network rebuild. The sharing percentage for aerial structure is 50%, which reflects that, in Arizona, Qwest owns more than 40% of the poles on which its facilities are attached and Qwest is typically a net payer of attachment fees. The 5% sharing figure for underground (95% assigned to Qwest) is based on discussions with subject matter experts. There were very few, if any, joint builds of conduit systems with other providers (i.e., cable television) and that safety concerns generally preclude power from occupying the same duct system as telecommunications. In addition, power does not usually follow the same footprint as telecommunications feeder plant. The TELRIC assumptions anticipate a total replacement of the telecommunications network and a single telecommunications provider. Under these parameters, there are relatively few opportunities to share in the construction costs for conduit systems.

o. The cost for network components such as buried, aerial or underground cables, digital loop carrier systems, serving area interfaces, drop pedestals / terminals, and drop wires are taken from network price lists that are derived from the contracts Qwest has with network equipment vendors. The calculations that are performed on these items prior to input to LoopMod are shown in Confidential Attachment E, the spreadsheet "cable cost Formulas.xls". Confidential Attachment E is provided pursuant to the Confidentiality Agreement in this proceeding.

p. Please see Confidential Attachment F, the spreadsheet "LoopMod item descriptions.xls". This provides a description for each network component in LoopMod that can be used to map to the CPR data. Confidential Attachment F is provided pursuant to the Confidentiality Agreement in this proceeding.

q. Qwest objects to this request on the grounds that it seeks information that is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and is overly broad. Specifically, Qwest does not use "Continuing Property Records" to develop the amounts that this request references. Notwithstanding this objection Qwest responds as follows:

Please see Confidential Attachment G, the spreadsheet "CPR Arizona - Cable.xls". Confidential Attachment G is provided pursuant to the Confidentiality Agreement in this proceeding.

r. The standard manufactured length for stub cables is 30 feet. This is not an "average" length that was determined by the LoopMod modelers.

s. Please see the response to AT&T Set 3 No. 117 P.

t. Please see the response to AT&T Set 3 No. 117 q.

u. Please see the response to AT&T Set 3 No. 117 P.

v. Please see the response to AT&T Set 3 No. 117 q.

w. Please see the response to AT&T Set 3 No. 117 p.

x. Please see the response to AT&T Set 3 No. 117 q.

y. Please see the response to AT&T Set 3 No. 117 P.

z. Please see the response to AT&T Set 3 No. 117 q.

aa. Please see the response to AT&T Set 3 No. 117 P.

bb. Please see the response to AT&T Set 3 No. 117 q.

cc. Please see the response to AT&T Set 3 No. 117 p.

dd. Please see the response to AT&T Set 3 No. 117 q.

ee. Qwest objects to this request on the basis that it calls for proprietary business information. Notwithstanding this objection, the Qwest Feeder Architecture addresses a variety of issues. With regard to the copper/fiber crossover distance it states that copper/fiber first cost differences will achieve parity for telephony in the near future. It also states that the operational costs of fiber facilities will be substantially less than that of copper. Considering only these two factors, there is a strong advantage to ceasing the placement of copper facilities, and accelerating the transition to photonic technologies as is practical. The exception to this statement will occur in areas where feeder relief is required to areas less than 12.0

kilofeet from the central office. The first choice in the Feeder Architecture strategy is to provide fiber-fed digital loop carrier systems for relief to areas further than 12.0 kilofeet from the central office and free-up existing copper for use closer in. Only where this strategy cannot be achieved is copper recommended for placement, and especially termination at the central office.

ff. As explained in AT&T Set 3, No. 117 part (ee), the selection of the 12 kilofeet crossover point was based on consideration of both construction costs and ongoing operational expenses.

gg. The 12 kilofeet copper / DLC crossover default in LoopMod was influenced by cost considerations as well as compliance with the desire to avoid loading of cable pairs in a forward looking network design. There is no documentation of which parameter had the most influence on selecting the 12 kilofeet distance. Also, please refer to the responses to AT&T Set 3 No. 114 and No. 117 part ee.

hh. Qwest has provided a complete and legible copy of Exhibit RJB-3. The 18 pages listed in the header of Exhibit RJB-3 include the cover page and the Table of Contents page. There are 16 pages of text.

ii. Please see the response to AT&T Set 3 No. 117 part o.

jj. Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

kk. Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

ll. Please see the response to AT&T Set 3 No. 117 part o.

mm. Qwest objects to this request on the grounds that it seeks information that is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and is overly broad. Specifically, Qwest does not use "Continuing Property Records" to develop the amounts reflected in the cells that this request references. Notwithstanding this objection, the Fiber Optic Equipment listed on page 15 is manufactured by E/O Networks (32 line systems), NEC (96 and 192 line systems) and Alcatel (672 and 1344 line systems).

Respondent: Jennifer Peppers, Cost Interface Manager, Qwest  
Respondent: Scott Weakley, Capacity Planner, Qwest (i and m)

**SUPPLEMENTAL RESPONSE DATED 06/07/01**

- (i) Please see response to AT&T set 02 data request #92.
- (jj) Please see response to AT&T set 02 data request #92.
- (kk) Please see response to AT&T set 02 data request #92.

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 118S1

Refer to the NAC Model, DS1V0101ZONESCapFeederLoop.xls and respond to the following with respect to each and every one of the nine tabs for which costs are computed for the various DS1 capable loop architectures (i.e., HDSL SONEPLEX, HDSL LOOPEXTENDER, SONET FIBER MUX, SONET with HDSL, SONET with ORB, PAIR GAIN, PAIR GAIN with HDSL, FD-6, DS1-DS0 MUX OPTION):

a. For each "ITEM" which is described in worksheet Column A and for which a "MATERIAL INVESTMENT" appears in Column B, provide the name of the manufacturer(s) for the "ITEM." For example, name the manufacturer(s) of the equipment which comprises the entry "LOOP EXTENDER 12" BAY" that appears at Cell A31 on the tab designated HDSL LOOP EXTENDER

b. For each item for which a manufacturer is identified in "a" above, identify that manufacturer's designation for the item (such as "loop extender bay," "plug-in", etc.; the manufacturer's part number for the item of equipment; etc.), and state Qwest's actual material price paid for that item of equipment as that price is most recently reflected in Qwest's CPR records.

c. For each item of equipment identified in "b" above, state Qwest's actual fully-loaded installation labor cost as that cost is most recently reflected in Qwest's CPR records.

d. For each item of equipment identified in "b" above, state Qwest's actual other capitalized cost (list, in detail -- for example, capitalized sales taxes) as that cost is most recently reflected in Qwest's CPR records.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #92.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 003-119S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 119S1

RE: Cost Studies  
Witness: Million/Buckley

Refer to the tab designated "EQUIPMENT\$" in the NAC Model titled "DS3V010IZONESnew.xls" and respond to the following with respect to each entry in Column A for which a "UNIT\$" entry appears at Column B:

- a. Provide the name of the manufacturer(s) for the item described in Column A, For example, name the manufacturer(s) of the equipment which comprises the entry "Cabinet" that appears at Cell A5.
- b. For each item for which a manufacturer is identified in "a" above, identify that manufacturer's designation for the item (such as "Cabinet" "PW1A" "TCA,"etc.; the manufacturer's part number for the item of equipment; etc.), and state Qwest's actual material price paid for that item of equipment as that price is most recently reflected in Qwest's CPR records.
- c. For each item of equipment identified in "b" above, state Qwest's actual fully-loaded installation labor cost as that cost is most recently reflected in Qwest's CPR records.
- d. For each item of equipment identified in "b" above, state Qwest's actual other capitalized cost (list, in detail -- for example, capitalized sales taxes) as that cost is most recently reflected in Qwest's CPR records.
- e. Provide a complete and legible copy of any and all work papers, studies, surveys, computer programs, computer models, and other documents, upon which Qwest relies in developing each of the "UNIT\$" figures that appears under Column B of the tab titled "EQUIPMENT\$." For example, provide the work papers, studies, surveys, computer programs, computer models, etc. upon which Qwest relies in developing the "UNIT\$" figure of \$444.37 for the "DSX3T Termination w/Coax, Premises" that appears at cell B21 on the worksheet tab titled "EQUIPMENT\$."

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #92.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 04-121

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 121

RE: Cost Studies  
Witness: Million

Please provide all passwords required to unlock the worksheets, including hidden rows and columns, in the file "TKM-20 UPS WP.xls" in cost study 4731.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information. Notwithstanding this objection, Qwest responds as follows:

This workbook is protected by two different passwords. The first is needed to unlock the total workbook, and the password is **hideups**. A second password is needed to unlock each of the Vendor Proprietary Tabs within the workbook, these tabs have VP in the title. The password needed to unlock the VP tabs will be provided when permission is granted from the vendors to release this information. The password provided above is case sensitive and should be typed just as shown.

Respondent: Jennifer Peppers

Arizona  
Docket No. T-00000A-00-0194  
AT&T 04-122S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 122S1

RE: Cost Studies  
Witness: Million

Please provide documents sufficient to set for the vendor product descriptions, current retail prices, and current actual prices paid by Qwest for all equipment included in cost study 4731.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #92.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 04-124S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 124S1

RE: Cost Studies  
Witness: Million

Please provide all passwords required to view any file associated with ICM. In particular, provide passwords for all locked database files used or produced by SCM.

RESPONSE:

Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide this information. The password needed to unlock the protected database (SCM) will be provided when permission is granted from the vendors to release this information. No other database files in ICM are password protected.

Respondent: Jennifer Peppers

SUPPLEMENTAL RESPONSE DATED 06/26/01

Confidential Attachment A contains information used by the modelers to view calculations. The password to view the SCM databases in MS Access is contained in Attachment B.

Respondent: Terri Million, Qwest

Arizona  
Docket No. T-00000A-00-0194  
AT&T 04-125

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 125

RE: Cost Studies

Witness: Million

Please provide complete pricing data for the end office and tandem switches modeled by ICM. These data must include documents sufficient to set for the vendor product descriptions, current retail prices, and current actual prices paid by Qwest for the switches modeled.

RESPONSE:

Please see response to data request AT&T 02-086.

Respondent: Jennifer Peppers

Arizona  
Docket No. T-00000A-00-0194  
AT&T 05-128S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 128S1

With respect to the proposed Signaling System 7 rate elements, explain in detail how each of the investment values contained in the file "SIS,v5.xls", 'Model Source Data' worksheet, rows 67-192, columns B and G, are computed. Provide all underlying vendor investment information.

RESPONSE:

Qwest objects to this data request on the grounds that it is overly broad and unduly burdensome. Also, Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide the vendor's information and is in the process of compiling the requested detailed explanations. Qwest will provide the detailed explanations as soon as they are completed and the vendor information when permission to release the information is granted.

Respondent: Jennifer Peppers, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #92.

Arizona  
Docket No. T-00000A-00-0194  
AT&T 05-129S1

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 129S1

With respect to the proposed Signaling System 7 rate elements, explain in detail how each of the investment values contained in the file "SS7 program,v4.xls", 'Signal Msg. Investments' worksheet, rows 15-131, columns E and F, are computed. Provide all underlying vendor investment information.

RESPONSE:

Qwest objects to this data request on the grounds that it is overly broad and unduly burdensome. Also, Qwest objects to this request on the basis that it calls for proprietary business information involving a third party. The foregoing notwithstanding, Qwest is in the process of seeking vendor permission to provide the vendor's information and is in the process of compiling the requested detailed explanations. Qwest will provide the detailed explanations as soon as they are completed and the vendor information when permission to release the information is granted.

Respondent: Jennifer Peppers, Qwest

SUPPLEMENTAL RESPONSE DATED 06/07/01

Please see response to AT&T set 02 data request #92.

**D**

Arizona  
Docket No. T-00000A-00-0194  
AT&T 09-203

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 203

Please review the direct testimony of Dick Buckley at Exhibit RJB-3, page 4 of 18. Please confirm that the "latest contracts the Network Department has for placement of buried plant" referenced in that testimony as "support" for placement costs have been produced by Qwest with its supplemental response to Data Request AT&T 2-92 dated June 29, 2001. Please state whether there are any contracts upon which these placement costs are based that have not been produced.

RESPONSE:

The contracts produced by Qwest are the current contracts in effect with outside plant placement contractors. The LoopMod placing costs are based on contracts that were in effect at the time that Loopmod was developed. Some of those contractors are no longer doing business with Qwest, so there are no current contracts for those vendors.

Respondent: Jennifer Peppers

**E**

Arizona  
Docket No. T-00000A-00-0194  
AT&T 07-153

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 153

Please review Qwest's response to Data Request AT&T 2-90 and the supplemental response dated June 7, 2001. Please identify the contracts produced in response to AT&T Data Request 2-92 that are the vendor contracts relied upon in developing the default material investments used in the Transport Camp Module.

RESPONSE:

Vendor permission has not yet been granted.

Respondent: Legal

**F**

Arizona  
Docket No. T-00000A-00-0194  
AT&T 10-212

INTERVENOR: AT&T Communications of the Mountain States, Inc.

REQUEST NO: 212

For each of the following data requests, please state whether Qwest has now produced all documents called for by the request: AT&T 002-035, 064, 074, 075, 076, 077, 086, 090, 091, 092, 095, 096; AT&T 003-117 parts (i) (ee) (jj) and (kk), 118, 119; AT&T 004-121, 122, 124, 125, 126 and AT&T 006-132. If Qwest has failed to produce any document requested, please state whether Qwest intends to provide a further response and when that response will be made.

RESPONSE:

See responses to data requests enumerated above. Yes. As soon as the remaining vendors grant the release of their information, Qwest will provide their contracts.

Respondent: Maryann Klasinski, Manager

**G**

BEFORE THE  
ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE GENERIC )  
INVESTIGATION INTO U S WEST )  
COMMUNICATIONS, INC.'S COMPLIANCE )  
WITH CERTAIN WHOLESALE PRICING ) DOCKET NO. T00000A-00-0194  
REQUIREMENTS FOR UNBUNDLED )  
NETWORK ELEMENTS AND RESALE )  
DISCOUNTS )

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DIRECT TESTIMONY OF

THOMAS H. WEISS

ON BEHALF OF  
AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC.  
WORLDCOM CORPORATION  
&  
XO ARIZONA, INC.

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RE: QWEST'S LOOPMOD2 COST MODEL

PROPRIETARY VERSION

May 18, 2001

EXCERPT CONTAINS NO PROPRIETARY INFORMATION

1 A. Given the broad difference between the nationwide average described and  
2 Qwest's proposed LM2 default drop lengths, I recommend that the Commission  
3 shorten Qwest's default proposals by about 30 percent in DG3 and 50 percent in  
4 DGs 4 and 5. Specifically, I recommend that the Commission adopt average drop  
5 lengths of 50 ft. for DG3, 100 ft. for DG4, and 150 ft. for DG5.

6 4. Placement Costs:

7 **Q. WHAT IS YOUR UNDERSTANDING OF THE DEFAULT CABLE**  
8 **PLACEMENT COSTS USED BY QWEST IN ITS LM2 UNE LOOP COST**  
9 **STUDIES?**

10 A. Qwest contends that its default placement costs per foot of cable/conduit for  
11 various methods of placing buried cable are "contracted costs" that derive from  
12 contracts into which Qwest has entered with several cable construction  
13 contracting firms.<sup>22</sup> The unit costs range from a low of \$1.19 to plow a foot of  
14 cable into the ground to a high of \$14.33 per ft. to directionally bore the cable.<sup>23</sup>  
15 The accuracy of the unit costs for placing buried cable is critical to the  
16 determination of valid UNE loop costs through LM2.

17 **Q. GIVEN THE IMPORTANCE OF THESE UNIT COST INPUTS TO LM2,**  
18 **DID AT&T SEEK TO INVESTIGATE QWEST'S CLAIMS WITH**  
19 **RESPECT TO UNIT COST OF MATERIAL AND CONSTRUCTION?**

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<sup>22</sup> PROPRIETARY page 4 to Exhibit RJB-3 submitted with the testimony of Dick Buckley on behalf of Qwest.

<sup>23</sup> Directional boring involves the deployment of expensive high-precision lateral drilling machinery to place buried cable in sections where substantial disruption of to the operation or use of critical infrastructure would result if other construction methods were used.

1 A. Yes. AT&T's discovery request, Set No. 3, Item No. 117 addressed a broad range  
2 of LM2 matters, and it included requests for the documents that support Qwest's  
3 material and construction cost estimates.<sup>24</sup> In the same information request,  
4 AT&T sought data and documents that would show Qwest's actual recent  
5 Arizona booked unit costs of material and labor associated with loop construction  
6 in the state.<sup>25</sup>

7 **Q. DID QWEST RESPOND TO THE AT&T REQUESTS?**

8 A. Qwest steadfastly objected to most of the requests, then provided answers that:  
9 (1) were not responsive; (2) provided no substantive answer (along with an  
10 explanation as to why nothing substantive was provided), or (3) simply (and  
11 without explanation) provided nothing at all. In short, Qwest's responses to  
12 AT&T's requests for information to support Qwest's material and construction  
13 cost estimates produced nothing of value by which AT&T, this Commission, its  
14 Staff or other intervenors could assess and critically evaluate Qwest's claimed  
15 material and construction cost estimates. If Qwest does provide the information  
16 sought in response to AT&T Request 03-117, then I would like the opportunity to  
17 supplement this testimony based on those responses.

18 **Q. NOTWITHSTANDING QWEST'S INTRANSIGENCE IN RESPONDING**  
19 **TO AT&T'S REQUEST 03-117, DO YOU HAVE ANY COMMENTS AT**

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<sup>24</sup> ATT Request 03-117, Items (h), (i), and (o).

<sup>25</sup> ATT Request 03-117, Items (p), (q), (r), (s), (t), (u), (v), (w), (x), (y), (z), (aa), (bb), (cc), and (dd).

**BEFORE THE ARIZONA CORPORATION COMMISSION**

**IN THE MATTER OF )  
INVESTIGATION INTO QWEST )  
CORPORATION'S COMPLIANCE ) DOCKET NO. T-00000A-00-0194  
WITH CERTAIN WHOLESAL )  
PRICING REQUIREMENTS FOR )  
UNBUNDLED NETWORK )  
ELEMENTS AND RESALE )  
DISCOUNTS )**

**DIRECT TESTIMONY OF THOMAS H. WEISS**

**ON BEHALF OF THE JOINT CASE OF**

**AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC.,**

**WORLDCOM, INC. AND XO ARIZONA, INC.**

**RE: QWEST COST MODELS IN GENERAL, RECURRING COST  
ANALYSES FOR DS1 AND DS3 CAPABLE LOOPS,  
UDIT AND SHARED TRANSPORT  
AND INPUTS AND ASSUMPTIONS TO THE  
AT&T/WORLDCOM NON-RECURRING COST MODEL**

**[PROPRIETARY VERSION]**

**MAY 16, 2001**

1 Other General and Administrative expenses are a classic example of the expenses  
2 to which the FCC refers at §§ 51.505 and 51.609 of its rules. These are expenses  
3 that would not change whether or not Qwest offered CLECs access to local  
4 interconnection or unbundled network elements. Accordingly, no amount of  
5 Other General and Administrative expenses should be assigned/allocated to the  
6 cost of local interconnection and unbundled network elements.

7 **3. Investment Issues**

8 **a. General**

9 **Q. WE HAVE JUST DISCUSSED THE FLAWS IN QWEST'S ANALYSIS**  
10 **ASSOCIATED WITH COST AND EXPENSE FACTORS. YOU**  
11 **MENTIONED THAT YOU ALSO HAVE CONCERNS ABOUT QWEST'S**  
12 **INVESTMENT ANALYSIS. PLEASE DESCRIBE WHAT THOSE**  
13 **CONCERNS ARE.**

14 **A.** I am concerned that Qwest's proprietary computer models do not allow the  
15 Commission or anyone else to truly examine the validity of the incremental  
16 investment costs they generate. That is a fundamental problem that impacts all  
17 the incremental investment costs, and I will describe that by way of example  
18 using the material investment costs.

19 **Q. PLEASE EXPLAIN YOUR UNDERSTANDING OF HOW QWEST**  
20 **DEVELOPS ITS PROPOSED INCREMENTAL INVESTMENT COSTS.**

21 **A.** Mathematically, Qwest multiplies the cost factors by the incremental investment  
22 costs to determine its interconnection and UNE costs. To determine the

1 incremental costs Qwest uses a series of proprietary computer models to develop  
2 its proposals for incremental investment costs. Each model is designed to reflect  
3 the characteristic of the various elements for which investment costs are to be  
4 computed. For example, the Qwest model for DS1 capable loops considers six  
5 different DS1 loop architectures (i.e., circuit designs) and it reflects the cost of  
6 material, labor and other resources that Qwest believes are necessary to make  
7 DS1 capable loops available to CLECs; a completely different model, based on a  
8 single DS3 loop architecture, is used to develop Qwest's version of the cost to  
9 make DS3 capable loops available to CLECs; and so on.

10 While each model is quite different from the others in terms of their individual  
11 constructions, all models are common in that they assume incremental material  
12 costs and "Fill Factors" and then apply "Total Investment Factors" to the  
13 "grossed-up"<sup>47</sup> investment costs to compute the amount of investment to which  
14 the cost factors are applied to compute monthly costs. Thus, the key elements in  
15 the process of defining incremental investment costs are: (1) determine  
16 equipment material costs; (2) apply fill factors; and (3) apply loadings. The  
17 process of computing the monthly costs of interconnection and unbundled  
18 network elements is carried out in the Qwest proprietary software program known  
19 as the Wholesale Cost Model (formerly known as WINPC3).

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<sup>47</sup> The phrase "grossed-up" is meant to describe the investment model process, discussed later, that loads material investment costs for spare and otherwise unused capacity.

1 **Q. WITH THAT UNDERSTANDING, PLEASE DESCRIBE YOUR**  
2 **CONCERNS USING THE MATERIAL INVESTMENT EXAMPLE YOU**  
3 **MENTIONED EARLIER.**

4 A. According to Ms. Million, Qwest used “current market prices to determine the  
5 costs of equipment and materials” used in its cost studies.<sup>48</sup> Without more, Qwest  
6 expects the Commission and everyone else to take it on faith that incremental  
7 material price estimates are actual and appropriate current market prices.

8 **Q. WERE YOU ABLE TO VERIFY THE ACCURACY OF QWEST’S**  
9 **MATERIAL PRICE ESTIMATES?**

10 A. No. Through AT&T, I requested copies of the source documents behind the  
11 material price estimates used by Qwest. In response to all AT&T requests for  
12 copies of the vendor material price information, Qwest simply stated that it would  
13 investigate whether the requested documents would be released by the respective  
14 vendors. As this written testimony is being prepared, Qwest has not responded to  
15 AT&T’s requests by providing actual copies of the vendor material price  
16 documents that Qwest claims to be the source of the material prices used in its  
17 cost studies.

18 **Q. DID YOU ATTEMPT TO VERIFY QWEST’S MATERIAL PRICE**  
19 **ESTIMATES BY ANY OTHER MEANS?**

20 A. Yes. I did attempt to secure other information from Qwest that could have been  
21 used to verify the Company’s figures. Specifically, through AT&T, I requested

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<sup>48</sup> Direct Testimony of Teresa K. Million, page 7, lines 1, 2.

1 copies of any equipment price documents used internally by Qwest to develop  
2 service prices and/or planning studies. Also through AT&T, I requested copies of  
3 pages from Qwest's Arizona Continuing Property Records ("CPR") that would  
4 have reported material prices as they were actually charged to Qwest's Arizona  
5 books of account; those same records would also have aided in testing the  
6 accuracy of Qwest's material loadings. In response to both types of requests,  
7 however, Qwest refused to provide the documents sought by AT&T, claiming that  
8 they were not used in the development of the cost studies that it presented in the  
9 instant case.

10 **Q. DOES THE LACK OF SUPPORTING INFORMATION SUCH AS YOU**  
11 **HAVE REQUESTED FROM QWEST CALL INTO QUESTION THE**  
12 **VERACITY OF THE MATERIAL COST ESTIMATES USED BY**  
13 **QWEST?**

14 **A.** Yes, although I would prefer to render an opinion based upon examining the  
15 requested material which should provide ample evidence of whether Qwest's  
16 estimates are appropriate. In the event that Qwest does provide the information  
17 that I need, I would ask the Commission to allow me to file supplemental direct  
18 testimony that presents the results of my review and analysis of the information.  
19 In the meantime, my preliminary findings as to the incremental costs of specific  
20 interconnection and unbundled network elements are based upon Qwest's  
21 unverifiable material costs. I have made no adjustment to Qwest's alleged  
22 equipment and material prices.