Direct Testimony of William R. Easton

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF DETERMINING PRICES FOR UNBUNDLED NETWORK ELEMENTS (UNEs) IN QWEST CORPORATION'S STATEMENT OF GENERALLY AVAILABLE TERMS (SGAT)	)))))	DOCKET NO. TC01-098

DIRECT TESTIMONY OF

WILLIAM R. EASTON

ON BEHALF OF

QWEST CORPORATION

OCTOBER 15, 2002

I. IDENTIFICATION OF WITNESS

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION WITH QWEST CORPORATION.

A. My name is William R. Easton. My business address is 1600 7th Avenue, Seattle Washington. I am employed as Director – Wholesale Advocacy. I am testifying on behalf of Qwest Corporation ("Qwest").

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I graduated from Stanford University in 1975, earning a Bachelor of Arts degree. In 1980 I received a Masters of Business Administration from the University of Washington. In addition, I am a Certified Management Accountant and member of the Institute of Management Accountants.

I began working for Pacific Northwest Bell in 1980, and have held a series of jobs in financial management with U S WEST, and now with Qwest, including staff positions in the Treasury and Network organizations. From 1996 through 1998, I was Director – Capital Recovery. In this role I negotiated depreciation rates with the FCC and state commission staffs and testified in various regulatory proceedings. From 1998 until 2001 I was a Director of Wholesale Finance, responsible for the management of Wholesale revenue streams from a financial perspective. In this capacity I worked closely with the Product Management organization on their product offerings and projections of revenue.

In October of 2001 I moved from Wholesale Finance to the Wholesale Advocacy group, where I am currently responsible for advocacy related to Wholesale products and services. In this role, I work extensively with the Product Management, Network and Costing organizations.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THIS COMMISSION?

A. Yes. I previously testified in docket number TC 96-184.

II. PURPOSE OF DIRECT TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. This direct testimony describes certain of Qwest's products and services and how the recurring and nonrecurring charges that Qwest is proposing in this proceeding are applied to these products and services. Specifically, I describe the following products and services and their associated charges:

- Local interconnection service ("LIS")
- Collocation
- CLEC to CLEC connections
- Certain UNEs including:
  - Unbundled loops

- Sub-loops
- Unbundled Dedicated Interoffice Transport ("UDIT")
- Extended UDIT ("EUDIT")
- Unbundled dark fiber ("UDF")

- Other services including:
  - Enhanced extended loop ("EEL")
  - Access to poles, ducts and rights of way ("ROW")
  - Bona fide requests ("BFR")

III. LOCAL INTERCONNECTION SERVICE ("LIS")

Q. PLEASE GENERALLY DESCRIBE QWEST'S LOCAL INTERCONNECTION SERVICE ("LIS").

A. Qwest currently groups its rate elements associated with interconnection into LIS. Through the use of LIS rate elements, CLECs and Qwest may connect their respective networks together to transmit and route telephone exchange service traffic and exchange access traffic. The remainder of this section discusses each of the LIS rate elements.

A. ENTRANCE FACILITIES

Q. PLEASE DESCRIBE HOW AN ENTRANCE FACILITY IS USED TO INTERCONNECT QWEST'S NETWORK WITH A CLEC'S NETWORK.

A. Interconnection may be accomplished by leasing facilities from Qwest with which to enter a Qwest wire center. These leased facilities are provisioned as DS1 or DS3 entrance facilities. An entrance facility is the physical connection extending from the Qwest serving wire center to the CLEC's point of interconnection ("POI"). Qwest is proposing DS1 and DS3 recurring and nonrecurring entrance facility charges in this proceeding. It is important to understand that this type of entrance facility relates only to interconnection and that it differs from a collocation entrance facility which is discussed later in this testimony.

B. DIRECT TRUNK TRANSPORT

Q. PLEASE DESCRIBE DIRECT TRUNK TRANSPORT.

A. Direct Trunk Transport (DTT) is the facility between serving wire centers and tandem or end office switches. DTT facilities are provided as dedicated DS1 or DS3 facilities.

Q. HOW DOES QWEST PROPOSE TO CHARGE FOR DIRECT TRUNK TRANSPORT?

A. Recurring fixed and per mile charges will be applied to the DTT facilities ordered by a CLEC. The mileage for DTT facilities is measured and based upon the air mile distance between Qwest's serving wire center and the local/access tandem or end office using the following increments:

- DS1/DS3 0 to 8 miles
- DS1/DS3 Over 8 to 25 miles

- DS1/DS3 Over 25 to 50 miles
- DS1/DS3 Over 50 miles

C. MULTIPLEXING

Q. PLEASE DESCRIBE MULTIPLEXING AS IT RELATES TO QWEST'S LIS OFFERINGS.

A. Multiplexing is the process of either combining multiple lower bandwidth communications channels into a single higher bandwidth circuit (example: DS1s into a DS3) or separating a higher bandwidth signal into multiple lower bandwidth signals (example: DS3 into DS1s). Multiplexing is an optional service that a CLEC may purchase from Qwest.

Q. WHICH MULTIPLEXING CHARGES IS QWEST INTRODUCING IN THIS PROCEEDING?

A. Qwest is introducing recurring and nonrecurring charges that will apply for each DS3 to DS1 and DS1 to DS0 multiplexed arrangement.

D. TRUNK NONRECURRING CHARGES

Q. WHEN DOES QWEST PROPOSE THAT TRUNK NONRECURRING CHARGES SHOULD APPLY?

A. Qwest is proposing that nonrecurring installation charges be assessed for the first and each additional trunk ordered by a CLEC on an access service request ("ASR"). The charges will vary depending on whether the trunks will interface with a DS1 or DS3 LIS facility.

E. LOCAL TRAFFIC

Q. PLEASE DESCRIBE LOCAL TRAFFIC.

A. Local traffic is traffic that originates and terminates within the local calling area defined by the Public Utilities Commission of the State of South Dakota.

Q. WHAT LOCAL TRAFFIC CHARGES DOES QWEST PROPOSE?

A. Qwest proposes the following fixed and distance sensitive recurring charges for local traffic:

- End Office call termination (per minute of use)

- Tandem Switching (per minute of use)
- Tandem Transmission (per minute of use)

  0 to 8 miles

  Over 8 to 25 miles

  Over 25 to 50 miles

  Over 50 miles

Q. PLEASE DESCRIBE THE END OFFICE CALL TERMINATION RATE ELEMENT.

A. The end office call termination rate element is per minute of use for the use of the terminating end office switch to complete a local call.

Q. PLEASE DESCRIBE THE TANDEM SWITCHING RATE ELEMENT.

A. The tandem switching rate element is per minute of use for the use of a tandem switch in the event a call is routed through a local tandem switch for call completion.

Q. PLEASE DESCRIBE THE TANDEM TRANSMISSION RATE ELEMENT.

A. The tandem transmission rate element includes a fixed per minute of use charge and a recurring per mile charge for the transmission of traffic from the tandem switch to the terminating end office switch for call completion.

F. TRANSIT TRAFFIC

Q. WHAT IS TRANSIT TRAFFIC?

A. Transit traffic, when used in association with LIS, is traffic that neither originates nor terminates on Qwest's network. This includes traffic transmitted between one CLEC and another CLEC, or traffic that is transmitted between a CLEC and an ILEC (other than Qwest), interexchange carrier ("IXC") or wireless carrier, but that at some point does traverse Qwest's network.

Q. CAN LIS BE USED TO PROVIDE TRANSIT TRAFFIC?

A. Yes. LIS enables the completion of local traffic through the Qwest network that originates and terminates on non-QWEST switches.

Q. WHAT CHARGES DOES QWEST PROPOSE FOR TRANSIT TRAFFIC?

A. Qwest proposes the following charges for transit traffic:

- Local Transit - the same charges will apply to transit traffic as those that apply to tandem switching and tandem transmission.
- Tandem transmission – a charge based on an assumed 5 mile distance. This result is added to the tandem switching rate.
- IntraLATA toll - a charge consisting of the applicable Qwest switched access tandem switching and tandem transmission tariff rates.

- Jointly provided switched access - a charge consisting of the applicable switched access rates based on the Multiple Exchange Carrier Access Billing (MECAB) guidelines and the respective FCC and state access catalog provisions.

- Category 11 Mechanized Record charge - a per record charge to recover the cost for providing a CLEC with the information necessary for the CLEC to bill the originating carrier for transit traffic when technically feasible. The charge applies to each record created and transmitted to the CLEC. Qwest makes the Category 11 Mechanized Record available as an optional offering because the information contained on the record can also be provided by the carrier who originates the call.

IV. COLLOCATION SERVICES

A. GENERAL

Q. PLEASE DESCRIBE COLLOCATION.

A. Collocation is an arrangement where Qwest provides space within a Qwest premises for the placement of CLECs equipment to be used for the purpose of interconnection or access to unbundled network elements (UNEs) and ancillary services. The equipment can either be

owned and maintained by the CLEC or, in the case of a virtual collocation, may be leased back to and maintained by Qwest.

Q. WHICH RATE ELEMENTS APPLY TO QWEST'S COLLOCATION SERVICES?

A. Various recurring and nonrecurring rate elements apply to Qwest's collocation services. The rate elements are determined based upon the scope of the work to be performed as determined through an evaluation of the information provided by the CLEC on Qwest's collocation application form. The remainder of this section of the testimony discusses each of these rate elements.

B. ALL COLLOCATION

Q. PLEASE DESCRIBE THE RATE ELEMENTS COMMON TO MULTIPLE COLLOCATION TYPES.

A. These rate elements are generic in nature and are common to multiple types of collocation. The rate elements include: (1) collocation entrance facility, (2) cable splicing, (3) –48 Volt DC power usage, (4) AC power feed (5) inspector labor, (6) collocation terminations, (7) security, (8) central office clock synchronization, (9) space availability report, (10) space option fees and (11) cable augment quote preparation fee (QPF).

(1) **Collocation Entrance Facility:** Qwest offers three fiber collocation entrance facility options. Qwest proposes recurring and nonrecurring charges for each of these options. The first option is standard fiber entrance facility, the second option is cross-connect fiber entrance facility and the third option is express fiber entrance facility. These

options apply to caged physical collocation, cageless physical collocation and virtual collocation.

(a) **Standard Fiber Entrance Facility:** The standard fiber entrance facility provides fiber connectivity between a CLEC's fiber facilities delivered to the collocation point of interconnection ("C-POI") and the CLEC's collocation space. A fiber interconnection cable is placed between a CLEC's collocation space and the Fiber Distribution Panel (FDP).

(b) **Cross Connect Fiber Entrance Facility:** The cross-connect fiber entrance facility provides fiber connectivity between a CLEC's fiber facilities delivered to a C-POI and multiple locations within the Qwest wire center. The CLEC's fiber cable is spliced into a Qwest provided shared fiber entrance cable. The fiber cable terminates in an FDP. Fiber interconnection cables connect the second FDP and equipment locations in the wire center. This option has the capability to serve multiple locations or pieces of equipment within the office. This option provides maximum flexibility in distributing fibers within the wire center and readily supports virtual and cageless physical collocation and multiple CLEC locations in the office.

(c) **Express Fiber Entrance Facility:** Under this option Qwest will place a CLEC-provided fiber cable from the C-POI directly to the CLEC's collocation space. This option will not be available if there is less than one full-sized conduit for emergency restoration and two innerducts - one for emergency restoration and one for a shared entrance cable.

(2) **Cable Splicing Charge:** The cable splicing charge is intended to recover the labor and equipment necessary to perform any necessary splice or splices to a CLEC-provided fiber optic cable. The cable splicing charge consists of two nonrecurring elements: one for setup and one for each fiber spliced.

(3) **-48 Volt DC Power Usage:** The -48 Volt power usage charge is intended to recover the cost of purchasing power from the electric company and the cost of the power plant and maintenance to provide power to the CLEC's equipment. The recurring charges for plant and usage are applied per month, per amp.

(4) **AC Power Feed:** The AC power feed is an optional feature. The AC power feed recovers the cost incurred by Qwest to engineer and install the wire, conduit and support, breakers and miscellaneous electrical equipment necessary to provide AC power with generator backup to the CLEC's collocation space. The AC power feed is available with

single or three phase options. The recurring charges for AC power feed usage are recovered per month, per amp. The recurring and nonrecurring charges for AC power feed cable are recovered per foot, per month.

(5) **Inspector Labor Charge:** The inspector labor charge provides for the services of Qwest-qualified personnel, acting as inspectors, when a CLEC requires access to the C-POI after the initial installation. Any call out of an inspector after business hours is subject to a minimum charge of three hours. The minimum call out charge applies when no Qwest employee is present at the location and an "off-shift" Qwest employee or contract employee is required to go "on-shift" on behalf of CLEC. The inspector labor charge is a nonrecurring charge.

(6) **Collocation Terminations:** Collocation terminations provide the connection between the CLEC collocation space and a demarcation point. The demarcation point may be of the following: a new or existing interconnection distribution frame ("ICDF"), an existing digital cross-connect panel, an existing toll frame or fiber distribution panel or an existing intermediate frame. Recurring and nonrecurring charges apply for cable placement, cable, block placement and blocks required by the CLEC. OCn terminations also include rate elements for cable racking. The collocation termination rate elements include:

DS0 Terminations:
- DS0 Cable Placement, per 100 pair block
- DS0 Cable Placement per termination
- DS0 Cable per 100 pair block
- DS0 Cable per termination
- DS0 Block per 100 pair termination

DS0 Block per termination
DS0 Block Placement per 100 pair block
DS0 Block Placement per termination

DS1 Terminations:
DS1 Cable Placement per 28 DS1
DS1 Cable Placement per termination
DS1 Cable per 28 DS1s
DS1 Cable per termination
DS1Panel, per 28 DS1
DS1 Panel per termination
DS1 Panel Placement per 28 DS1
DS1 Panel Placement per termination

DS3 Terminations:
DS3 Cable Placement per termination
DS3 Cable per termination
DS3 Connector Placement per termination
DS3 Connector per termination

OCn terminations:
OCn Terminations per 12 fibers
OCn Additional Connector (if applicable)
OCn Cable Racking Shared (per 12 fibers)
OCn Cable Racking Dedicated

NOTE: Per termination rates apply when a CLEC places the cable.

(7) **Security:** Historically, Qwest restricted central office access to employees and authorized contractors in order to protect the network and to ensure service quality. With the implementation of physical collocation, however, CLECs need access to their collocated equipment within Qwest's central offices. Consequently, it is necessary to grant access to CLEC employees as well as their contractors. Costs are incurred by Qwest when it extends security measures to these CLEC personnel. Security charges recover the cost for security measures such as card readers at Qwest wire centers and identification cards issued to CLEC personnel. A recurring rate for "Access card per employee per office." applies in

addition to a recurring rate for "Card Access per employee, per Office." If requested, additional central office security infrastructure can be provided on an ICB basis.

(8) **Central Office Clock Synchronization:** Central office synchronization is required for collocation involving digital services or connections, although in some instances synchronization may be also be required for analog services. The CLEC must determine synchronization requirements for its equipment and notify Qwest of these requirements when ordering the clock signals. Central office clock synchronization is available where Qwest wire centers are equipped with Building Integrated Timing Supply ("BITS"). A monthly charge is applied on a per port basis.

(9) **Space availability report:** Upon request from a CLEC, Qwest will prepare a central office space availability report. The report will include the number of collocations within the central office, the number of equipment bay spaces available for collocation, any measures that Qwest has underway to make additional collocation space available, and finally, any modifications that Qwest may have made in the use of space since the last report was issued. A nonrecurring charge will apply for each central office Space Availability Report ordered.

(10) **Collocation Space Option:** A collocation space option allows a CLEC, Qwest, or a Qwest affiliate to option space in a Qwest wire center premises. Optioning space allows a CLEC to forecast a specific amount of space for collocation to be held in a Qwest wire center; however, it is not for a specific space location. Space can be optioned for transmission equipment for up to one year, circuit switched equipment for up to three

years, or power plants for up to five years. When all available space in the wire center is occupied or optioned, a right of first refusal allows a CLEC to either exercise its option for space or relinquish the space when notified by Qwest that a valid collocation application has been received from another CLEC.

Two space option rate elements are proposed. The first is a recurring charge for the space option fee. This charge is based on the amount of space being optioned on a per month and per square foot basis. The second is a nonrecurring charge known as the space option administration fee. This charge is intended to recover the cost of processing the application, feasibility, common space engineering, records management, and administration of the right of first refusal process.

(11) **Collocation Cable Augment QPF:** A collocation cable augment is an augment to existing termination cables which are the transmission facilities purchased by the CLEC for the purpose of accessing UNEs within the collocated central office. In order to qualify as a cable augment, the following criteria must be satisfied:

- Augment terminations must originate and terminate in the same central office;
- Augment terminations must originate from the same location as existing terminations;
- Augment terminations must terminate on the same frame as existing terminations;
- Augment terminations must be of the same transmission facility type (i.e., copper or fiber) as existing terminations; and
- Augment terminations must be of the same signal level (e.g., DS0, DS1, etc.) as existing terminations.

Qwest is proposing a Cable Augment Quote Preparation Fee (QPF), a non-recurring charge that recovers the labor associated with preparing a quote.

C. VIRTUAL COLLOCATION

Q. WHAT IS VIRTUAL COLLOCATION?

A. Virtual Collocation allows the placement of CLEC equipment in a Qwest central office, with Qwest having responsibility for the installation, maintenance and repair of the equipment. Unlike other forms of collocation, with virtual collocation the CLEC does not have access to its equipment.

Q. PLEASE DESCRIBE THE RATE ELEMENTS THAT ARE UNIQUE TO VIRTUAL COLLOCATION.

A. Following are the rate elements that are unique to virtual collocation:

(1) **Quote Preparation Fee (QPF):** QPF is a nonrecurring charge for the work required to verify space, power, cable terminations, review design requests and develop a price quote for the total cost to the CLEC for its collocation request. The CLEC will receive credit for the QPF charge when the collocation installation is completed and the CLEC submits the balance of the nonrecurring charge for that work.

(2) **Engineering Labor:** Engineering labor recovers the cost of planning and engineering the installation, change or removal of the CLEC's equipment and associated

supporting equipment such as power, cabling, cable racking, frame terminations, lighting, and entrance facility. Qwest charges CLECs per half-hour of engineering labor performed during regular business hours and a separate rate per half-hour for engineering performed outside of regular business hours.

(3) **Installation Labor:** Installation labor recovers the cost of the installation, change or removal of the CLEC's equipment and associated supporting equipment. Installation labor is assessed in half-hour increments for installation labor performed during regular business hours and at a separate rate per half-hour for installations performed outside of regular business hours.

(4) **Maintenance Labor:** Maintenance labor recovers the costs incurred by Qwest for the labor necessary to perform preventative maintenance of a CLEC's virtually collocated equipment and/or correct out of service and/or service affecting conditions. While the CLEC is responsible for ordering maintenance spares, Qwest will perform maintenance and/or repair work upon receipt of the replacement maintenance spare and/or equipment from a CLEC. Maintenance labor is assessed in half-hour increments for maintenance labor performed during regular business hours and at a separate rate per half-hour for maintenance performed outside of regular business hours.

(5) **Training Labor:** Training Labor recovers the cost of training Qwest employees on the installation and maintenance of non-standard equipment provided by a CLEC for use under a virtual collocation arrangement. This charge does not apply if a CLEC selects

equipment already in use by Qwest in the same metropolitan area. The training element covers the cost of training three Qwest employees and includes the actual cost of the training course as well as the employees' time. In the event a second CLEC selects the same equipment, the second CLEC is assessed a training fee equal to one-half the fee charged to the first CLEC. The first CLEC is refunded one-half the training fee.

(6) **Equipment Bay / per shelf:** Recovers the cost of the equipment rack in which the CLEC's virtually collocated equipment and fuse panel are mounted. The cost of the equipment bay is recovered through a recurring charge assessed per equipment shelf ordered.

(7) **Floor Space Lease:** This element applies to virtual collocation only in the instance where the CLEC provides its own equipment bay. This rate element provides the monthly lease for the space occupied by the CLEC-provided equipment bay, including property taxes and base operating cost without -48 volt DC power. Floor space lease includes convenience 110 AC-15 amp electrical outlets provided in accordance with local codes and may not be used to power transmission equipment or -48 volt DC power generating equipment. The floor space lease element also includes maintenance for the leased space. It provides for the preventative maintenance of environmental supports (climate controls, filters, fire and life systems and alarms, mechanical systems, standard HVAC) biweekly housekeeping services (sweeping, spot cleaning, trash removal) of the Qwest premises in areas surrounding the CLEC-provided equipment bay and general repair

and maintenance. The floor space lease charge includes the cost of the required aisle space on each side of the CLEC-provided equipment bay.

(8) **DC Power Cable:** The DC power cable provides power to the CLEC's collocation site to power its telecommunications equipment. These cables are dedicated to the CLEC and the cables run between the CLEC's collocation site and the main power board or battery distribution fuse board (BDFB). Qwest is proposing recurring and nonrecurring charges for DC Power Cable on a per feed basis.

D. CAGELESS PHYSICAL COLLOCATION

Q. WHAT IS CAGELESS PHYSICAL COLLOCATION?

A. Cageless physical collocation permits the CLEC to lease uncaged space where it can locate its equipment in single frame bay increments within a Qwest premises. The CLEC is responsible for the procurement, installation and on-going maintenance of its equipment, as well as those cross-connections required within the CLEC's collocation space.

Q. PLEASE DESCRIBE THE RATE ELEMENTS THAT ARE ASSOCIATED WITH CAGELESS PHYSICAL COLLOCATION.

A. There are four rate element categories associated with cageless physical collocation:

- Quote Preparation Fee
- Space Construction Charge

- Floor Space Lease
- DC Power Cable

Each of these rate element categories is described below:

(1) **Quote Preparation Fee (QPF):** QPF is a nonrecurring charge for the work required to verify space, power, cable terminations, review design requests and develop a price quote for the total cost to the CLEC for its collocation request. The CLEC will receive credit for the QPF charge when the collocation installation is completed and the CLEC submits the balance of the nonrecurring charge for that work.

(2) **Space Construction:** Space construction charges are intended to recover the costs incurred by Qwest in preparing a space for cageless collocation. In general, this would include engineering the job, site preparation, providing a single DC power feed, cable racking, securing overhead structure to support cable racking and CLEC equipment, additional lighting and the supporting environmental requirements (i.e. heating, ventilation and air conditioning). Both recurring and nonrecurring charges will apply for cageless collocation space construction.

Cageless collocation is configured to provide two bays for the placement of the CLEC's equipment. If the CLEC requires additional bays, incremental per bay recurring and nonrecurring charges will be applied to recover the prorated costs of the supporting structure, cable racking, lighting and grounding facilities.

(3) **Floor Space Lease:** This charge is intended to recover the cost of the space and its use. This would include: one 110 AC, 15 amp electrical outlet, preventative maintenance and repair of climate controls, filters, fire and life systems and alarms, mechanical systems and HVAC, bi-weekly housekeeping service and general repair and maintenance. A recurring monthly charge applies on a per square foot basis.

(4) **DC Power Cable:** The DC power cable provides power to the CLEC's collocation site to power its telecommunications equipment. These cables are dedicated to the CLEC and the cables run between the CLEC's collocation site and the main power board or battery distribution fuse board (BDFB). Qwest is proposing recurring and nonrecurring charges for DC Power Cable on a per feed basis.

E. CAGED PHYSICAL COLLOCATION

Q. WHAT IS CAGED PHYSICAL COLLOCATION?

A. Caged physical collocation permits the CLEC to lease caged floor space within Qwest's premises for the placement of the CLEC's equipment. The CLEC is responsible for the procurement, installation and on-going maintenance of its equipment as well as the cross connections required within the cage.

Q. PLEASE DESCRIBE THE RATE ELEMENTS THAT ARE SPECIFIC TO CAGED PHYSICAL COLLOCATION.

A. There are five rate element categories that are specific to caged physical collocation:

- Quote Preparation Fee
- Space Construction Charge
- Floor Space Lease.
- DC Power Cable Charges
- Grounding Charge

Each of these rate element categories is described below:

(1) **Quote Preparation Fee (QPF):** QPF is a nonrecurring charge for the work required to verify space, power, cable terminations, review design requests and develop a price quote for the total cost to the CLEC for its collocation request. The CLEC will receive credit for the QPF charge when the collocation installation is completed and the CLEC submits the balance of the nonrecurring charge for that work.

(2) **Space Construction:** This charge recovers the cost of engineering the job, cage construction, providing a single DC power feed, overhead structures to support cable racking and CLEC equipment, additional lighting, and the supporting environmental requirements (i.e. heating, ventilation and air conditioning). There are both recurring and nonrecurring charges for caged collocation arrangements based on the size of the cage.

CLECs have the option to subcontract the construction of the caged enclosure. Any contractors must be approved by Qwest, and comply with Qwest's standards and practices.

When the CLEC chooses not to use Qwest to construct the cage, Qwest applies "fencing credits" to adjust both the recurring and nonrecurring charges according to the number of square feet of the cage.

(3) Floor Space Lease: This charge recovers the cost of the space itself and its use. This would include all inherent features of that space such as one 110 AC-15 amp electrical outlet, preventative maintenance and repair of climate controls, filters, fire and life systems and alarms, mechanical systems, HVAC, bi-weekly housekeeping service and general repair and maintenance. A recurring monthly charge applies on a per square foot basis.

(4) DC Power Cable: The DC power cable provides power to the CLEC's collocation site to power its telecommunications equipment. These cables are dedicated to the CLEC and run between the CLEC's collocation site and the main power board or battery distribution fuse board (BDFB). Qwest is proposing recurring and nonrecurring charges for DC Power Cable on a per feed basis.

(5) Grounding: The grounding rate element recovers the cost of extending the building DC ground from the grounding plane of the wire center to the CLEC's caged collocation space. There is a recurring and nonrecurring charge that varies by the type of grounding wire used. The charge applies on a per foot basis.

F. ADJACENT COLLOCATION

Q. PLEASE DESCRIBE ADJACENT COLLOCATION.

A. When space is exhausted at a particular Qwest premises, a CLEC may request adjacent collocation. To the extent it is technically feasible, Qwest will make space available in controlled environmental vaults or similar structures that are adjacent to Qwest's premises. Alternatively, Qwest will permit a CLEC to construct or otherwise procure such an adjacent structure on property owned or controlled by Qwest. Because each adjacent collocation request is unique, adjacent collocation is offered on an ICB basis.

V. OTHER COLLOCATION-RELATED SERVICES

A. CLEC-TO-CLEC CONNECTIONS

Q. WHAT TWO TYPES OF CLEC-TO-CLEC CONNECTIONS DOES QWEST OFFER?

A. Qwest offers CLEC-to-CLEC direct connection and CLEC-to-CLEC cross connection

Q. PLEASE DESCRIBE CLEC-TO-CLEC DIRECT CONNECTION.

A. CLEC-to-CLEC direct connections provide CLECs with the ability to connect with each other within the same Qwest wire center for the purpose of mutually exchanging traffic. A CLEC may also use these connections to connect multiple forms of its own collocations together within the same wire center. When a direct connection is requested between two collocations, a cable is placed between the collocations spaces of each CLEC. The

connections may be physical to physical, physical to virtual or virtual to virtual collocations.

Q. WHICH RATE ELEMENTS APPLY TO A DIRECT CONECTION?

A. A CLEC ordering the CLEC-to-CLEC direct connection will be charged:

(1) **Design Engineering and Installation Charge, No Cables**: This nonrecurring charge covers order processing, development of the price quote and the hours to engineer and install cable racking. There are separate charges for copper and fiber design engineering and installation.

(2) **Cable Racking (per foot)**: This recurring charge is a per foot, per month charge that recovers the cost of the racking used to support the cabling, but not the cabling itself. Prices also vary by the type of cabling supported (i.e., DS0, DS1, DS3 and Fiber).

(3) **Virtual Connections (connections only, no cables)**: This nonrecurring charge covers the labor cost to connect a cable to a virtual collocation, but does not include the cost of the cable itself. If two virtual collocations are involved, two virtual connection charges apply. Prices vary by type (i.e. DS0 per100 connections, DS1 per 28 connections, and DS3 per each connection.)

(4) **Cable Hole**: This non-recurring charge is incurred per occurrence. It covers the cost of the labor and material that are required to open and close holes or slots between floors or through interior walls designed to be compartmentalized. These holes and slots are closed with approved firestop material that meets OSHA standards and Qwest policy.

Q. PLEASE DESCRIBE CLEC-TO-CLEC CROSS CONNECTION.

A. CLEC-to-CLEC Cross-Connect is a cross connection between two Collocation spaces. The cross connect is made on an Interconnection Distribution Frame (ICDF) utilizing the terminations of the two Collocation spaces. The CLEC-to-CLEC Cross-Connect is typically engineered and connected by Qwest. However, since the two Collocations spaces must reside on the same ICDF, the CLEC may install the cross-connects. If Qwest performs the cross connection a nonrecurring charge applies.

VI. UNBUNDLED NETWORK ELEMENTS ("UNES")

A. INTERCONNECTION TIE PAIRS ("ITP")

Q. WHAT IS AN INTERCONNECTION TIE PAIR ("ITP") AS IT RELATES TO QWEST'S UNE OFFERINGS?

A. An ITP is a cable that is used to make a connection between a UNE and a demarcation point at an ICDF.

Q. WHAT RATE ELEMENTS ARE BEING PRESENTED FOR THE ITP?

A. Recurring rate elements apply for DSO, DS1, and DS3 connections on a per termination basis.

B. UNBUNDLED LOOPS

Q. PLEASE DESCRIBE THE QWEST UNBUNDLED LOCAL LOOP PRODUCT.

A. Qwest's unbundled local loop product establishes a transmission path between a wire center main distribution frame, or equivalent, up to and including, Qwest's network interface device ("NID") and/or demarcation point at the end user location.

Q. WHAT RECURRING RATE ELEMENTS IS QWEST PROPOSING FOR ANALOG UNBUNDLED LOOPS IN THIS DOCKET?

A. Recurring rates are proposed for 2-wire and 4-wire analog voice grade loops and 2-wire and 4-wire non-loaded loops.

Q. DOES QWEST PROPOSE ANY OTHER RECURRING CHARGES APPLICABLE TO ANALOG LOOPS?

A. Yes. Qwest is proposing two other recurring charges for unbundled analog loops:

- 2 wire unbundled analog loop grooming
- 4 wire unbundled analog loop grooming

These charges cover the cost of migrating a loop off of an integrated digital loop carrier system when there are no copper loops available.

Q. DOES QWEST HAVE ANY NONRECURRING CHARGES RELATED TO ANALOG LOOPS?

A. Yes. In addition to installation charges, which I will discuss shortly, Qwest is proposing a nonrecurring charge to cover the cost of removing load coils and bridge tap should the CLEC request non-loaded loops.

Q. IS QWEST PROPOSING RATE ELEMENTS FOR DIGITAL CAPABLE LOOPS IN THIS DOCKET?

A. Yes. Qwest is proposing recurring charges for the following types of digital capable loops:

- DS0
- DS1
- DS3
- OCn

Q. PLEASE DESCRIBE THE DS0 CAPABLE LOOP.

A. The DSO capable loop includes a basic rate ISDN capable loop, digital subscriber loop ("xDSL-I") and an asymmetric digital subscriber loop ("ADSL").

Q. WHAT DSO CAPABLE LOOP RECURRING CHARGES DOES QWEST PROPOSE?

A. Recurring charges are proposed for each of the DSO capable loops in zones 1,2 and 3.

Q. PLEASE DESCRIBE THE DS1 CAPABLE LOOP.

A. The DS1 capable loop is a transmission path between a wire center network interface at a DS1 panel or equivalent in a Qwest serving wire center and the network interface at the end user location. The DS1 capable loop is capable of transporting bi-directional DS1 signals with a nominal transmission rate of 1.544 Mbit/s.

Q. WHAT DS1 CAPABLE LOOP RECURRING CHARGE DOES QWEST PROPOSE?

A. A recurring charge is proposed for each DS1 capable loop ordered within zones 1,2 and 3.

Q. PLEASE DESCRIBE THE DS3 CAPABLE LOOP.

A. The DS3 capable loop is a transmission path between a Qwest central office network interface and an equivalent demarcation point at an end user location. The DS3 capable loop is capable of transporting bi-directional DS3 signals with a nominal transmission rate of 44.736 Mbit/s.

Q. WHAT DS3 CAPABLE LOOP RECURRING CHARGE DOES QWEST PROPOSE?

A. A recurring charge is proposed for each DS3 capable loop ordered within zones 1,2 and 3.

Q. DOES QWEST PROPOSE CHARGES FOR HIGH CAPACITY CAPABLE LOOPS OTHER THAN DS1 AND DS3 LOOPS?

A. Yes. Qwest proposes recurring charges for OC-3, OC-12, and OC-48 high capacity loops. Qwest is also proposing recurring charges for 2-wire extension technology and 2-wire unbundled loop grooming when requested by the CLECs.

Q. WHAT NONRECURRING INSTALLATION CHARGES ASSOCIATED WITH UNBUNDLED LOOPS DOES QWEST PROPOSE?

A. Qwest proposes the following unbundled loop installation charges:

- Basic Installation
- Basic Installation with Performance Testing
- Basic Installation with Cooperative Testing
- Coordinated Installation with Cooperative Testing
- Coordinated Installation without Cooperative Testing

There are separate charges for the first and each additional installation. Each of these installation options is described below. A more detailed explanation is also provided in the testimony of Qwest witness Dennis Pappas.

Q. PLEASE DESCRIBE BASIC INSTALLATION.

A. Basic installation is available for new or existing unbundled local loops. For an existing end-user, the basic installation option is the "lift and lay" procedure. In this scenario, the Qwest technician "lifts" the loop from its current termination and "lays" it on a new termination connecting to the CLEC. For new end-user service, the basic installation option may require a dispatch to the end-user premises. The Qwest technician will

complete the circuit wiring and conducting performance tests to ensure the circuit meets the required parameter. Test results are not provided to the CLEC.

Q. PLEASE DESCRIBE BASIC INSTALLATION WITH PERFORMANCE TESTING.

A. Basic installation with performance testing is available for new or existing unbundled local loops. For an existing end-user, the "lift" and "lay" process is performed. In addition, performance testing is done to ensure the circuit meets the required parameters limits. Test results are provided to the CLEC's designated contact during close-out. For new end-user service, this option requires a dispatch to the end-user premises. The Qwest technician will complete the circuit wiring and conduct performance tests to ensure the circuit meets the required parameter limits. The test results are provided to the CLEC's designated contact during close-out.

Q. PLEASE DESCRIBE BASIC INSTALLATION WITH COOPERATIVE TESTING.

A. Basic installation with cooperative testing is available for a new or existing unbundled local loop and provides for mutual testing of the loop by Qwest and the CLEC. Unlike performance testing which only tests the Qwest portion of the network, cooperative testing allows for the testing of both the CLEC and Qwest portions of the loop. For an existing end-user, the "lift" and "lay" process described above is performed, and the CLEC's designated contact is called on the due date to perform loop back acceptance testing, accept the loop and exchange demarcation information. Test results are provided during close-out. For new end-user service, this option requires a dispatch to the end-user's premises. The Qwest Technician will complete the circuit wiring and conduct the performance tests to

ensure the circuit meets the required parameter limits. The CLEC's designated contact is called on the due date to perform loop back acceptance testing, accept the loop and exchange demarcation information. The test results are provided during close-out.

Q. PLEASE DESCRIBE THE COORDINATED INSTALLATION WITH COOPERATIVE TESTING.

A. Coordinated installation with cooperative testing is available for a new or existing unbundled local loop. The LSR submitted must designate a specific "Appointment Time" for the cooperative testing to occur. For an existing end-user, the "lift" and "lay" process is performed on the due date at the designated "Appointment Time". The Qwest technician will contact the CLEC's designated contact to ensure that the CLEC is ready for the installation, at which time the work is initiated and the required performance test conducted. Additional tests requested by the CLEC are also performed at this time. The test results are provided during close-out. For new end-user service, this option requires a dispatch to the end-user premises. On the due date, at the designated 'Appointment Time' the Qwest technician will contact the CLEC's designated contact to ensure that the CLEC is ready for the installation. After that contact the installation work is initiated and the required performance test conducted. Additional tests requested are also performed at this time. The test results are provided during close-out.

Q. PLEASE DESCRIBE COORDINATED INSTALLATION WITHOUT COOPERATIVE TESTING.

A. Coordinated installation without cooperative testing is available for a new or existing Unbundled Local Loop. The LSR submitted must designate a specific "Appointment

Time" to coordinate the conversion activity. For an existing end-user, the "lift" and "lay" process is performed on the due date, at the designated "Appointment Time." The Qwest technician will notify the CLEC that the conversion activity is beginning. The CLEC's designated contact will be notified by the technician once the "lift" and "lay" process is completed. Performance test results are provided during close-out. For new end-user service, a dispatch may be required to tie down the new circuit at the end-user premises. The CLEC may elect to specify that no dispatch is requested. This will signal the Qwest technician that he or she will not need to stay at the premises to perform the coordinated installation once the circuit is in place. On the due date and at the designated appointment time after the circuit is in place, the Qwest technician will contact the CLEC to ensure that the CLEC is ready for the installation. The work will be initiated and the required performance tests conducted after that contact. The CLEC's designated contact is notified when the installation is complete.

Q. WHEN A CLEC CONVERTS A PRIVATE LINE TO AN UNBUNDLED LOOP DOES QWEST PROPOSE A NONRECURRING CHARGE?

A. Yes. Qwest proposes a nonrecurring charge for the conversion. A conversion of a private line to an unbundled loop does not require any redesign of the loop or a disruption of the end-user's service but does require changes in Qwest's mechanized systems.

C. SUB-LOOP UNBUNDLING

Q. PLEASE DESCRIBE QWEST'S SUB-LOOP OFFERING?

A. A sub-loop is defined as any portion of the loop that it is technically feasible to access at Qwest accessible terminals located throughout the outside plant. Qwest offers CLECs access to a subloop at accessible terminals wherever technically feasible. The sub-loop types addressed in this testimony include a 2-Wire distribution loop, an intra-building cable-per pair and a DS1 capable feeder loop.

Q. PLEASE IDENTIFY THE CHARGES APPLICABLE TO THE 2-WIRE ANALOG DISTRIBUTION LOOPS AND THE 2-WIRE ANALOG/NON LOADED DISTRIBUTION LOOPS.

A. Recurring charges apply to each 2-wire analog distribution loop located within zones 1, 2 and 3. There are separate charges for the first and each additional loop.

Q. PLEASE DESCRIBE THE INTRABUILDING CABLE LOOP PRODUCT.

A. When the CLEC places outside plant to a building and wishes to access the Qwest owned riser cable or inside wire through a building terminal, it must order an intra-building cable loop. The CLEC, or building owner, will place a common terminal or cross-connect facility near the existing Qwest terminal.

Q. WHAT INTRA-BUILDING LOOP CHARGES DOES QWEST PROPOSE?

A. Qwest proposes the following nonrecurring intra-building cable loop charges:

- No Dispatch (1st and each additional loop)
- Dispatch (1st and each additional loop)

Qwest is also proposing a monthly recurring charge for each intra-building loop.

Q. PLEASE DESCRIBE THE MULTI-TENANT ENVIRONMENT (MTE) POINT OF INTERCONNECTION (POI).

A. The Multi-Tenant Environment (MTE) - Point of Interconnection (POI) is the demarcation point or network interface within a multi-tenant building used by CLECs to access the unbundled intra-building cable (IBC) Sub-Loop. A MTE Terminal is an accessible terminal in a multi-tenant building or an accessible terminal physically attached to a multi-tenant building. To create the MTE-POI, a CLEC creates a cross-connect field at the MTE Terminal that allows it to connect its facilities to Qwest's facilities. Cable facilities are the only equipment that a CLEC places at the MTE Terminal.

Q. WHAT NONRECURRING CHARGES IS QWEST PROPOSING FOR MTE-POI?

A. Qwest is proposing nonrecurring charges related to loading CLEC inventory into Qwest databases. These charges apply on a per request basis.

Q. PLEASE DESCRIBE QWEST'S DS1 CAPABLE FEEDER LOOP OFFERING.

A. A DS1 capable feeder loop is a digital transmission path that is provisioned from a Qwest central office interface consisting of a DSX-1 panel, or equivalent, to the accessible terminal. DS1 capable unbundled feeder loop transports bi-directional DS1 signals with a nominal transmission rate of 1.544 Mbit/s.

Q. WHAT CHARGES APPLY FOR DS1 CAPABLE FEEDER LOOP?

A. Recurring charges apply to DS1 capable feeder loops in zones 1, 2 and 3. Separate nonrecurring charges apply to the first and each additional DS1 feeder loop installed.

D. FIELD CONNECTION POINT ("FCP")

Q. PLEASE DECSRIBE QWEST'S FIELD CONNECTION POINT ("FCP") PRODUCT?

A. The FCP permits a CLEC to interconnect with the Qwest network outside of the central office location where it is technically feasible to do so. For example, the FCP allows the CLEC to access an unbundled sub-loop at a feeder distribution interface ("FDI").

Q. WHAT TYPES OF CHARGES ARE PROPOSED FOR FCP?

A. Two nonrecurring charges are proposed for FCP. The first nonrecurring charge is the feasibility and quote preparation charge. The second charge is an FCP reclassification fee related to the reclassification of spare FCP terminations

E. NETWORK INTERFACED DEVICE ("NID")

Q. PLEASE DEFINE THE TERM NETWORK INTERFACE DEVICE ("NID").

A. The NID provides an interface between Qwest's loop facility and the end user's inside wire and is considered a component of the unbundled loop facility. The NID provides a protective ground connection, provides protection against lightning and other high voltage surges and is capable of terminating cables such as twisted pair cable. The NID is available as a stand-alone element and is also considered a part of the unbundled loop facility or sub-loop facility.

Q. WHAT CHARGES APPLY TO THE NID?

A. Qwest is proposing a nonrecurring charge for the NID when it is a stand alone element.

F. UNBUNDLED DEDICATED INTEROFFICE TRANSPORT ("UDIT") AND EXTENDED UNBUNDLED DEDICATED INTEROFFICE TRANSPORT ("EUDIT")

Q. PLEASE DESCRIBE THE UNBUNDLED DEDICATED INTEROFFICE TRANSPORT ("UDIT") OFFERING.

A. UDIT is a network element that provides a CLEC with a single transmission path between two Qwest wire centers in the same LATA. UDITs are available in DS0, DS1, DS3, OC-3, OC-12 and OC-48 bandwidths, where facilities are available.

Q. WHAT CHARGES IS QWEST PROPOSING FOR UDIT?

A. Qwest is proposing recurring fixed and per mile charges and nonrecurring charges for DS0, DS1, DS3, OC-3, OC-12 and OC-48 UDITs.

Q. IS QWEST INTRODUCING OTHER UDIT-RELATED PRODUCTS AND SERVICES IN THIS COST PROCEEDING?

A. Yes. Qwest is introducing UDIT rearrangement, low side performance and multiplexing in this cost proceeding.

Q. PLEASE DESCRIBE UDIT REARRANGEMENTS.

A. A CLEC may request that UDIT terminations be moved or rearranged at the CLEC demarcation point. A CLEC may also request that UDIT options be changed. Rearrangements may be ordered by the CLEC for working UDITS in place at single and dual office locations.

Q. WHAT CHARGES APPLY TO UDIT REARRANGEMENTS?

A. Nonrecurring charges are proposed for UDIT rearrangements involving DS0 single offices, DS0 dual offices, high capacity single offices and high capacity dual offices.

Q. WHAT IS LOW SIDE CHANNELIZATION AS IT APPIES TO THE UDIT PRODUCT?

A. Low Side Channelization modifies the circuit with the basic performance requirements needed for the circuit to function. It may also provide various signaling parameters necessary to enhance the basic performance.

Q. WHAT CHARGES APPLY TO LOW SIDE CHANNELIZATION?

A. Qwest proposes a recurring charge for low side channelization. Qwest also proposes recurring and nonrecurring charge for low side channelization with multiplexing.

Q. HOW IS MULTIPLEXING USED IN RELATION TO THE UDIT PRODUCT?

A. Multiplexing is the process of either combining multiple lower bandwidth communications channels into a single higher bandwidth circuit (example: DS1s into a DS3) or separating a higher bandwidth signal into multiple lower bandwidth signals (example: DS3 into DS1s). Multiplexing is an optional service that a CLEC may purchase from Qwest. As traffic is moved throughout the network on a UDIT, the various speeds of the traffic on that UDIT may be multiplexed as traffic is distributed to various locations enabling more efficient use of the circuits For example, multiple DS1s may be aggregated by multiplexing for transport across a DS3 UDIT.

Q. WHAT CHARGES DOES QWEST PROPOSE FOR MULTIPLEXING?

A. Qwest proposes a nonrecurring charge for DS1 to DS0 and DS3 to DS1 multiplexing.

Q. PLEASE DECSRIBE QWEST'S EXTENDED UNBUNDLED DEDICATED INTEROFFICE TRANSPORT OFFERING (EUDIT).

A. EUDIT is a network element that provides a CLEC with a bandwidth specific transmission path between the Qwest Serving Wire Center and the CLEC's Wire Center, or an IXC's point of presence located within the same Qwest Serving Wire Center area. EUDIT is a bandwidth-specific interoffice transmission path. EUDIT is available in DS1, DS3, OC-3, OC-12 and OC-48 bandwidths where facilities are available.

Q. PLEASE IDENTIFY THE EUDIT CHARGES THAT QWEST IS INTRODUCING.

A. Qwest is introducing recurring and nonrecurring rates for DS1, DS3, OC-3, OC-12, and OC-48 EUDIT.

Q. PLEASE DEFINE REMOTE NODE AND REMOTE PORT IN CONJUNCTION WITH EUDIT.

A. Remote Node provides the technical equipment necessary to deliver transport services in high bandwidth capacities. At least one Remote Port (card) must be ordered with Remote Node to deliver the transmission over the transport facility at a specified level (e.g. an OC3 Remote Node can deliver 3 DS3s or 84 DS1s via a port/s; at OC12). A remote node/port may be ordered in conjunction with E-UDIT where remote node equipment exists and has spare capacity.

Q. IS QWEST PROPOSING RATES FOR EUDIT REMOTE NODES AND PORTS?

A. Yes. Qwest proposes recurring rates for the remote nodes and remote ports for OC3; OC12; and OC48 EUDIT. Qwest is also proposing nonrecurring charges for the remote ports.

G. UNBUNDLED DARK FIBER (UDF)

Q. PLEASE DESCRIBE QWEST'S UNBUNDLED DARK FIBER (UDF) OFFERING.

A. UDF is a deployed unlit pair of fiber optic cables or strands that connect two points within Qwest's network.

Q. PLEASE SUMMARIZE THE UDF CHARGES THAT QWEST IS INTRODUCING IN THIS COST PROCEEDING.

A. Qwest is introducing charges for Initial Records Inquiry, Field Verification and Quote Preparation, , Field Verification, UDF-Interoffice Facilities (IOF) charges, UDF Loop charges and Extended Unbundled Dark Fiber (E-UDF) and Splice. Qwest is also introducing charges for unbundled dark fiber rate elements on Single Strand Increment basis.

Q. WHAT IS INITIAL RECORDS INQUIRY (IRI)?

A. The IRI rate element recovers the cost associated with the pre-order work effort conducted by Qwest to determine the availability of UDF. IRI is a one-time nonrecurring charge that applies for each route check requested by a CLEC. A simple IRI will be conducted to determine if UDF is available between two Qwest wire centers, or between a Qwest wire center and a Qwest customer premises. A complex IRI will be conducted to determine if UDF is available between a Qwest wire center and an outside structure (CEV, hut, etc.) located along the loop fiber route. Nonrecurring charges for the simple and complex inquiries are being proposed in this proceeding.

Q. PLEASE DESCRIBE FIELD VERIFICATION AND QUOTE PREPARATION (FVQP).

A. FVQP is an nonrecurring rate element that covers the pre-order work that estimates the cost of providing UDF access to CLECs at locations other than Qwest wire centers or end user premises or any time a single splice is requested in the loop or E-UDF. When splicing is

required the process must start with an Engineering Verification ("EV") which starts the FVQP process.

Q. PLEASE DESCRIBE EV.

A. EV involves the search of engineering records for splicing locations and splicing availability. The EV will start the FVQP time frame of 20 days. If a single splice is not available over the requested route, Qwest will terminate the request and the CLEC will be billed for the work associated with the EV portion of the FVQP. If the single splice is available and the CLEC wants to discontinue the request prior to completion of the FVQP process, the FVQP will be cancelled and the CLEC will be billed for the EV. If a single splice is available and the CLEC elects to continue with the process, the CLEC will be billed for the FVQP. In this case, the EV will be deducted from the total FVQP charge.

Q. PLEASE DESCRIBE THE UDF-INTEROFFICE FACILITY ("IOF").

A. UDF-IOF is an unlit pair of fiber optic cable or strands that connect two Qwest wire centers.

Q. WHAT UDF-IOF RECURRING CHARGES DOES QWEST PROPOSE?

A. Qwest proposes the following UDF-IOF recurring charges:

- Termination - fixed per pair, per office
- Fiber transport - per pair, per mile
- Fiber cross-connect - per pair, per office

These same elements are also available on a per strand basis.

Q. WHAT UDF-IOF NONRECURRING CHARGES DOES QWEST PROPOSE?

A. Qwest proposes the following UDF-IOF nonrecurring charges:

- Order charge - per 1st pair or strand, per route, per order
- Order charge each additional - per pair or strand, same route
- Fiber Cross-Connect - per pair or strand, per office

Q. PLEASE DESCRIBE THE UNBUNDLED DARK FIBER LOOP (UDF-LOOP).

A. UDF-loop is an existing loop that extends between a Qwest wire center and a fiber distribution panel located at an appropriate outside plant structure, or an end-user customer's premises within the same wire center.

Q. WHICH UDF-LOOP RECURRING CHARGES DOES QWEST PROPOSE?

A. Qwest proposes the following recurring charges for the UDF-Loop:

- Termination - fixed per pair, per office
- Termination – fixed per pair, per prem
- UDF-loop fiber - per route, per pair
- UDF-loop fiber cross-connect - per pair, per office

These same elements are also available on a per strand basis.

Q. WHAT UDF-LOOP NONRECURRING CHARGES DOES QWEST PROPOSE?

A. Qwest propose the following UDF-Loop nonrecurring charges:

- Order charge - per first pair or strand, per route, per order
- Order charge each additional - per pair or strand, same route
- Fiber cross-connect - per pair or strand, per office

Q. PLEASE DESCRIBE EXTENDED UNBUNDLED DARK FIBER (E-UDF).

A. E-UDF is an unlit pair of fiber optic cable or strands located between a Qwest wire center and a CLEC wire center.

Q. WHICH E-UDF RECURRING CHARGES DOES QWEST PROPOSE?

A. Qwest proposes the following recurring charges for E-UDF:

- Termination - fixed per pair, per office
- Termination - fixed per pair, per prem
- Fiber transport - per route, per office
- Fiber cross-connect - per pair, per office

These same elements are also available on a per strand basis.

Q. WHICH E-UDF NONRECURRING CHARGES DOES QWEST PROPOSE?

A. Qwest propose the following E-UDF nonrecurring charges:

- Order charge - per first pair or strand, per route, per order
- Order charge each additional pair or strand - per pair, same route
- Fiber cross-connect - per pair, per office

Q. PLEASE DESCRIBE THE DARK FIBER SPLICE.

A. Qwest will accommodate a CLEC's request for access to a Qwest fiber UNE-loop or sub-loop. In doing so, Qwest will provide a fiber stub from an accessible splice point when unspliced fiber (non-ribbon) is available. If space permits, the CLEC may use this fiber stub for making its fiber splice.

Q. WHAT DARK FIBER SPLICE CHARGES DOES QWEST PROPOSE?

A. A nonrecurring charge is proposed for a dark fiber splice.

H. MISCELLANEOUS NONRECURRING CHARGES

Q. PLEASE GENERALLY DESCRIBE THE NATURE OF THE ACTIVITIES FOR WHICH MISCELLANEOUS NONRECURRING CHARGES WOULD APPLY.

A. Miscellaneous nonrecurring charges are intended to cover additional engineering, labor and testing when incurred by Qwest. Miscellaneous charges may be assessed when a CLEC requests work that is not part of the nonrecurring charges normally associated with a product. A CLEC may also be charged a miscellaneous nonrecurring charge when a CLEC reports a trouble condition and, through testing, Qwest isolates the trouble to the portion of the network for which the CLEC is responsible.

Q. PLEASE PROVIDE A LIST OF THE MISCELLANEOUS CHARGES?

A. Qwest is proposing charges for the following miscellaneous services:

- Additional Engineering - Basic (per 1/2 Hour)

- Additional Engineering - Overtime (per 1/2 Hour)
- Additional Labor Installation-Overtime (per 1/2 Hour)
- Additional Labor Installation-Premium (per 1/2 Hour)
- Additional Labor Other-Basic (per 1/2 Hour)
- Additional Labor Other-Overtime (per 1/2 Hour)
- Additional Labor Other-Premium (per 1/2 Hour)
- Testing and Maintenance Basic (per 1/2 Hour)
- Testing and Maintenance Overtime (per 1/2 Hour)
- Testing and Maintenance Premium (per 1/2 Hour)
- Maintenance of Service-Basic (per1/2 Hour)
- Maintenance of Service-Overtime (per1/2 Hour)
- Maintenance of Service-Premium (per1/2 Hour)
- Additional Coop Acceptance Test-Basic (per1/2 Hour)
- Additional Coop Acceptance Test-Overtime (per1/2 Hour)
- Additional Coop Acceptance Test-Premium (per1/2 Hour)
- Nonscheduled Coop Test-Basic (per 1/2 Hour)
- Nonscheduled Coop Test-Overtime (per 1/2 Hour)
- Nonscheduled Coop Test-Premium (per 1/2 Hour)
- Nonscheduled Manual Test-Basic (per 1/2 Hour)
- Nonscheduled Manual Test-Overtime (per 1/2 Hour)
- Nonscheduled Manual Test-Premium (per 1/2 Hour)
- Cooperative Scheduled Test-LOSS (per test per Month)

- Coop Scheduled Test-C-Message Noise (per test per Month)
- Coop Scheduled Test-Balance (per test per Month)
- Coop Scheduled Test-Gain Slope (per test per Month)
- Coop Scheduled Test-C Notched Noise (per test per Month)
- Manual Scheduled Test – Loss (per test per Month)
- Manual Scheduled Test-C-Message Noise (per test per Month)
- Manual Scheduled Test-Balance (per test per Month)
- Manual Scheduled Test-Gain Slope (per test per Month)
- Manual Scheduled Test-C Notched Noise (per test per Month)

Q. DOES QWEST PROPOSE OTHER MISCELLANEOUS ELEMENTS IN ADDITION TO THOSE ADDRESSED IN THIS PROCEEDING?

A. Yes. Qwest proposes to introduce an additional dispatch charge, date change and design change elements in this cost proceeding.

Q. PLEASE DESCRIBE WHEN A NONRECURRING CHARGE WOULD APPLY FOR ADDITIONAL DISPATCH.

A. A nonrecurring charge would apply when, at the request of the CLEC, a Qwest technician is dispatched an additional time to a CLEC designated location.

Q. PLEASE DESCRIBE WHEN A NONRECURRING CHARGE WOULD APPLY FOR A DATE CHANGE.

A. A date change nonrecurring charge would apply when the CLEC changes a previously established due date for service. Such a change necessitates the issuance of a new service order.

Q. PLEASE DESCRIBE WHEN AN INDIVIDUAL NONRECURRING CHARGE WOULD APPLY FOR DESIGN CHANGE.

A. A nonrecurring charge would apply when a design change occurs that requires an engineer's review. Such design changes may include a change of end user premises, the addition or deletion of optional features or functions, or a change in the type of transport termination.

Q. HOW DOES QWEST PROPOSE TO CHARGE FOR EXPEDITES AND CANCELLATIONS?

A. Qwest proposes to charge for expedites and cancellations on an ICB basis.

VII. OTHER SERVICES

A. LOOP MUX COMBINATION

Q. PLEASE DEFINE THE LOOP MUX COMBINATION.

A. The Loop MUX Combination (LMC) product offering is a combination of an unbundled loop or an EEL loop with a multiplexer (i.e. Mux), located within the same Qwest wire center.

Q. PLEASE DESCRIBE THE NONRECURRING RATES QWEST PROPOSES FOR LMC.

A. Qwest proposes the following nonrecurring charges:

- Loop MUX 2 or 4 wire analog loop – first and each additional
- DS1 Loop MUX loop – first and each additional
- LMC DS1 to DS0 Multiplexer
- LMC DS3 to DS1 Multiplexer

Qwest is also proposing a nonrecurring charge for a Private Line to Loop MUX Conversion.

B. ENHANCED EXTENDED LOOP ("EEL")

Q. PLEASE DESCRIBE QWEST'S ENHANCED EXTENDED LOOP ("EEL") OFFERING.

A. An EEL is a means by which a CLEC may access an end user customer not located in the same Qwest wire center in which the CLEC is collocated. An EEL is a combination of a loop and dedicated interoffice transport facilities. .

Q. PLEASE IDENTIFY THE CHARGES THAT QWEST PROPOSES FOR EEL.

A. Qwest proposes charges for the following EEL and EEL-related elements: EEL link, EEL transport, multiplexing, DS0 channel performance, concentration capability and Private Line to EEL Conversion. A description of each element and its associated rate elements follows:

(1) **EEL Link:** The EEL link is the loop connection between the end user customer premises and the serving wire center. Nonrecurring charges are proposed for the first and each additional DS0 2 Wire, DS0 4 Wire, DS1, DS3, OC3, OC12 and OC48. The recurring charges being proposed are the same as those for the corresponding Unbundled Loops.

(2) **EEL Transport:** EEL transport consists of the dedicated interoffice facilities between Qwest wire centers. Qwest proposes recurring fixed and recurring per mile charges for DS0, DS1, DS3, OC3, OC12 and OC48.

(3) **DS1 and DS3 Transport Multiplexing:** Nonrecurring charges apply for DS1 to DS0 and DS3 to DS1 transport multiplexing.

(4) **EEL Multiplexing:** Recurring charges apply for DS1 to DS0 and DS3 to DS1 multiplexing.

(5) **DSO Channel Performance:** DS0 low side channelization and DS1/DS0 MUX low side channelization are the two rate elements being introduced for DSO channel performance. Recurring charges apply to both types of channelization.

(6) **Concentration Capability:** A recurring ICB rate will apply for space preparation and space lease, equipment installation, cabling and associated terminations and structure installation, personnel training, if required, and delivery of required power.

(7) **Private Line to EEL Conversion:** A nonrecurring rate applies to each Private Line to EEL Conversion.

B. Access to Poles, Ducts, Conduits and Rights of Way ("ROW")

Q WHICH ELEMENTS WITHIN THE CATEGORY OF POLES, DUCTS, CONDUITS AND RIGHTS OF WAY ("ROW") IS QWEST INTRODUCING IN THIS COST DOCKET?

A. Qwest proposes the following nonrecurring charge elements:

- Pole inquiry fee (per inquiry)
- Innerduct inquiry fee (per inquiry)
- ROW inquiry fee
- ROW documentation fee
- Field verification fee (per pole)
- Field verification fee (per manhole)

- Planner verification (per manhole)
- Manhole verification Inspector (per manhole)
- Transfer of Responsibility
- Make Ready
- Manhole make-ready inspector (per manhole)
- Access Agreement Consideration

Qwest also presents the recurring price elements of Pole Attachment Fee and Innerduct Occupancy Fee which are calculated using an FCC mandated methodology.

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Q. PLEASE DESCRIBE THE ACTIVITIES ASSOCIATED WITH THE POLE AND INNERDUCT INQUIRY FEES.

A. The pole inquiry fee and the innerduct inquiry fee are a non-refundable pre-paid charges used to recover the costs associated with performing an internal record review to determine if a requested route and/or facility is available for lease.

Q. WHAT IS THE ROW INQUIRY FEE?

A. The ROW inquiry fee recovers the cost to research and provide a CLEC with copies of publicly recorded easements and a matrix of private easements that the CLEC's route will pass through.

Q. WHAT IS INCLUDED IN THE ROW DOCUMENTATION FEE?

A. The ROW documentation fee recovers the cost of research and preparation of documents associated with private easements, including the preparation of quit claim deeds as required.

Q. PLEASE DESCRIBE FIELD VERIFICATION FEES.

A. The Field verification fees are non-refundable, pre-paid charges that recover the costs incurred by Qwest to conduct a field survey of a route to determine the availability of and scope of any required make-ready work for CLECs to access Qwest's poles or innerducts. Separate field verification fees apply for poles and manholes.

Q. CAN A CLEC USE ITS OWN CONTRACTOR TO PERFORM FIELD VERIFICATION OF MANHOLES?

A. Yes. If a CLEC uses its own contractor the following two fees apply:

- Planner Verification (per manhole)
- Manhole Verification Inspector (per manhole)

Q. PLEASE DESCRIBE THE PLANNER VERIFICATION FEE.

A. The planner verification fee is a pre-paid charge that recovers the cost for Qwest's tactical planner to review records and prepare a final field inspection report of availability.

Q. PLEASE DESCRIBE THE MANHOLE VERIFICATION CHARGE.

A. When a CLEC performs the field verification step of an innerduct request, a Qwest inspector is present throughout the verification to ensure that manholes are opened and

sealed properly and that work safety standards are followed by the CLEC's workers. The manhole verification inspector fee is a nonrecurring charge assessed per manhole.

Q. WHAT IS THE TRANSFER OF RESPONSIBILITY CHARGE?

A. The Transfer of Responsibility charge applies when a CLEC occupying space on Qwest poles or in its innerduct transfers this occupancy to another party. The nonrecurring charge covers the cost of changing Qwest's records.

Q. WHAT IS THE MAKE READY FEE?

A. The make ready fee is a pre-paid non-refundable (other than true-up) charge which recovers the cost of necessary work required to make the requested facility/ROW available for access. For innerduct, this could include, but is not limited to, the placing of innerduct in conduit/duct systems or core drilling of manholes. For Pole Attachment requests, this could include, but is not limited to, the replacement of poles to meet required clearances over roads or land. For ROW, this Make-Ready could include, but is not limited to, personnel time, including attorney time.

Q. WHAT IS THE PURPOSE OF THE MANHOLE MAKE-READY INSPECTOR FEE?

A. The manhole make-ready Inspector, per manhole fee recovers the cost for a Qwest inspector to be present during the placement of innerduct by a CLEC. The inspector ensures that the CLEC places its innerduct according to the accepted construction standards and that the assigned conduit is used for innerduct.

Q. WHAT IS COVERED BY THE POLE ATTACHMENT FEE?

A. The pole attachment fee is charged the CLEC for the occupancy of pole space. The fee is charged per foot, per year. There are separate charges for urban pole attachments and rural pole attachements.

Q. WHAT IS THE INNERDUCT OCCUPANCY FEE?

A. The innerduct occupancy fee is a pre-paid fee that is charged the CLEC for, occupancy of innerduct space. The fee is charged per foot, per year.

Q. WHAT IS THE ACCESS AGREEMENT CONSIDERATION FEE?

A. This is a nonrecurring fee which constitutes consideration for conveying access to the Right of Way to the CLEC.

C. BONA FIDE REQUESTS

Q. PLEASE DESCRIBE A BONA FIDE REQUEST ("BFR") AND THE ASSOCIATED NONRECURRING CHARGE.

A. A request by a CLEC for interconnection or access to a UNE or ancillary service that Qwest does not make readily available will be treated as a BFR. Qwest will use the BFR process to determine the terms and timetable for providing the requested interconnection or access to UNEs or ancillary services. Qwest is proposing a nonrecurring nonrefundable processing fee for the BFR process.

VIII. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes it does. Thank you.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of October, 2002, the foregoing **Direct Testimony of Bill Easton** was filed and served upon the following parties as follows:

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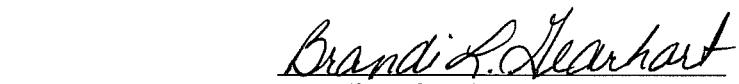

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