

Arizona
T-01051B-03-0454 and T-00000D-00-0672
WDA 19-003

INTERVENOR: William W. Dunkel and Associates

REQUEST NO: 003

With reference to page 3, lines 3-5 of her Rebuttal testimony, Ms. Million states:

For example, whether calculating price floors for retail services or UNE rates for unbundled elements Qwest's cost studies include the entire cost of the loop and the port in the cost of the service or element.

A. Is it Ms. Million's testimony that Qwest includes the entire cost of the loop and the port in the cost of switched access when calculating price floors for switched access services?

B. Is it Ms. Million's testimony that Qwest includes the entire cost of the loop and the port in the cost of Caller ID service when calculating price floors for Caller ID service?

C. Is it Ms. Million's testimony that Qwest includes the entire cost of the loop and the port in the cost of any vertical features services when calculating price floors for those vertical features services? If yes, please specify for which vertical features services Qwest includes the entire cost of the loop and the port in the cost of those features when calculating price floors for those services.

D. Is it correct that Qwest includes the entire cost of the loop and the port in the cost of residential basic local exchange service when calculating price floors for residential basic local exchange service?

E. Is it correct that residential basic local exchange service is the only residential service for which Qwest includes the entire cost of the loop and the port in the in the cost of a residential service when calculating price floors? If the response is no, please provide a complete list of each residential service for which Qwest includes the entire cost of the loop and the port in the in the cost of that residential service when calculating price floors for that service.

RESPONSE:

A. No.

B. No.

C. No.

D. Yes.

E. Yes. However, in addition to the basic primary and additional access line service, residential basic local exchange service may be included in packages that contain additional products or services.

Respondent: Richard Buckley, Jr.