Qwest Corporation ("Qwest") objects to the Arizona Corporation Commission Staff’s first set of data requests as follows:

1. Qwest objects to data request No. DW-1-1(C), (D), and (E) on the grounds that each part is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of information relevant to the issues in this proceeding. These requests pertain to CLECs outside of Arizona and ask for information covering over 800 individual CLEC agreements throughout each of the 14 states within Qwest’s territory.

Subject to this objection, information will be provided pursuant to data request No. DW-1-1(A) and (B) to the extent that each part pertains to CLECs in the state of Arizona.
2. Qwest objects to data request No. DW-1-17(C) on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of information relevant to the issues in this proceeding. The request does not pertain to any expert witnesses who have testified or will testify in the matter but asks for information regarding any expert familiar with Qwest’s incremental cost studies or any issues related to these studies. Subject to this objection, relevant information will be provided in response to data request DW-1-17(A) and (B)(i) & (ii).

DATED this 1st day of December, 2000.

FENNEMORE CRAIG, P.C.

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ORIGINAL and ten copies of the foregoing filed this 1st day of December, 2000 with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007
COPY of the foregoing hand-delivered this ___ day of December, 2000.

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