Qwest Corporation ("Qwest") objects to data request No. AT&T 1-010 and all subparts on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of information relevant to the issues in this proceeding. Response to this request would require a significant amount of time, labor and programming in part because much of the paper data requested is archived and must be reviewed manually. Even if resources were able to be dedicated to this effort, not all of the information asked for in all subparts could be provided because the financial data is not tracked at the level of detail requested.

Additionally, some data is no longer available at the specific job level because the particular job is closed; if that data is not available, it may not be possible to identify
category codes, which helps identify collocation costs as opposed
to other costs. The specific documents requested (i.e. invoices
and time sheets) do not always identify the related specific
collocation arrangements.

DATED this 7th day of December, 2000.

FENEMORE CRAIG, P.C.

By

Timothy Berg
Theresa Dwyer
3003 North Central, Suite 2600
Phoenix, Arizona  85012
Attorneys for Qwest Corporation

ORIGINAL and ten copies of the
foregoing filed this  8th  day
of December, 2000 with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona  85007

COPY of the foregoing hand-delivered
this  8th  day of December, 2000.

Chief Counsel
Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona  85007

Deborah R. Scott, Director
Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona  85007