



WILLIAM E. HENDRICKS

September 6, 2017

Via eFiling and U.S. Mail Service

Oregon Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

RE: UM-1891 – Petition for Commission Approval of 2017 Addition  
to Non-Impaired Wire Center List  
Supplemental Highly Confidential Attachments C and D

Dear Commission:

Enclosed please find CenturyLink's Supplemental Highly Confidential Attachments C and D to Qwest Corporation d/b/a CenturyLink QC's Petition for Commission Approval of 2017 Addition to Non-Impaired Wire Center List, filed with the Public Utility Commission on August 15, 2017. The Highly Confidential Supplemental Attachments are marked, printed on green paper and sealed in a separate envelope per Protective Order No. 17-331.

If you have any questions or concerns regarding these copies, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "William E. Hendricks".

William E. Hendricks  
Senior Corporate Counsel

Enclosures

cc: Douglas Denney –Integra (via U.S. Mail. Signed Appendix "B" of Protective Order)  
Kim Isaacs – Integra (via U.S. Mail. Signed Appendix "B" of Protective Order)

902 Wasco St.  
Hood River, OR 97031  
Tel. 541.387.9439  
Fax. 541.400.8421  
tre.hendricks@centurylink.com

**Announcement Date:** May 15, 2017  
**Effective Date:** NA  
**Document Number:** CLEC\_Legal\_Ownership  
**Notification Category:** Network Notification  
**Target Audience:** [REDACTED]  
**Subject:** CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested

CenturyLink will be filing with state regulatory commissions requesting that certain wire centers located in those states be deemed non-impaired. This filing is being made because the wire centers meet the threshold criteria for non-impairment outlined in the Federal Communication Commission's ("FCC") Triennial Review Remand Order, FCC-04-290 ("TRRO").

One component of the FCC's non-impairment thresholds is the presence of fiber-based collocators in a wire center. Rule 51.5 of the FCC rules requires that to be deemed a fiber-based collocator; the following criteria must be met:

A fiber-based collocator is defined as any carrier, unaffiliated with the incumbent LEC (CenturyLink), that maintains a collocation arrangement in an incumbent LEC (CenturyLink) Wire Center, with active electrical power supply, and operates a fiber-optic cable or comparable transmission facility that:

- a. terminates at a collocation arrangement within the Wire Center;
- b. leaves the incumbent LEC's (CenturyLink's) Wire Center premises; and
- c. is owned by a party other than the incumbent LEC (CenturyLink) or any affiliate of the incumbent LEC (CenturyLink), except as set forth in this definition. Dark fiber obtained from an incumbent LEC (CenturyLink) on an indefeasible right of use basis shall be treated as non-incumbent LEC (non-CenturyLink) fiber-optic cable. Two or more affiliated fiber-based collocators in a single Wire Center shall collectively be counted as a single fiber-based collocator. For the purposes of this definition, "affiliate" is defined by 47 U.S.C. §153(1) and any relevant interpretation in that title.

The purpose of this notice is to advise you that CenturyLink is relying on the fiber-based collocation owned and operated by your company in support of its request that certain wire centers be found to be non-impaired and, therefore, relieving CenturyLink of unbundling obligations for certain high capacity UNEs.

Provided below is your carrier-specific fiber-based collocation data on which CenturyLink is relying for its determination of wire center non-impairment. Please review this data and contact CenturyLink by no later than June xx, 2017, if you disagree with the fiber-based collocation designation and you have information to support this position or if there is some inaccuracy in the information CenturyLink has on file identifying legal ownership.

CLEC Name	State	WC CLLI	CO Name	Type of Collocation
[REDACTED]				
[REDACTED]				
[REDACTED]				

	OR		Corvallis	Caged
	OR		Medford	Caged
	OR		Oregon City	Cageless

**By close of business on June 15, 2017, please send to CenturyLink via certified mail a letter that includes:**

- a. A verification of the ownership/relationship information described above, and;
- b. Additional information about other ownership relationships that may have an impact on CenturyLink's fiber collocation customer records for this wire center, if any, and;
- c. A confirmation that these relationships meet the requirements of the FCC's Order and;
- d. A validation of the fiber-based collocation data as described above.
- e. Corrections if any errors are contained in the information provided.

**Please address the letter to:**

Renee Albersheim  
CenturyLink  
930 15<sup>th</sup> Street, 6<sup>th</sup> Floor  
Denver, CO 80202

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[REDACTED]	OR	[REDACTED]	Corvalis	Caged

[REDACTED]

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[REDACTED]	OR	[REDACTED]	Pendleton	Cageless

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[REDACTED]	OR	[REDACTED]	Medford	Caged

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[REDACTED]	OR	[REDACTED]	Corvalis	Caged
[REDACTED]	OR	[REDACTED]	Hermiston	Caged

[REDACTED]	OR	[REDACTED]	Medford	Cageless
	OR		Medford	Caged
	OR		Oregon City	Cageless
	OR		Pendleton	Caged
	OR		Bend	Caged

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CenturyLink will be filing with state regulatory commissions requesting that certain wire centers located in those states be deemed non-impaired. This filing is being made because the wire centers meet the threshold criteria for non-impairment outlined in the Federal Communication Commission's ("FCC") Triennial Review Remand Order, FCC-04-290 ("TRRO").

One component of the FCC's non-impairment thresholds is the presence of fiber-based collocators in a wire center. Rule 51.5 of the FCC rules requires that to be deemed a fiber-based collocator; the following criteria must be met:

A fiber-based collocator is defined as any carrier, unaffiliated with the incumbent LEC (CenturyLink), that maintains a collocation arrangement in an incumbent LEC (CenturyLink) Wire Center, with active electrical power supply, and operates a fiber-optic cable or comparable transmission facility that:

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The purpose of this notice is to advise you that CenturyLink is relying on the fiber-based collocation owned and operated by your company in support of its request that certain wire centers be found to be non-impaired and, therefore, relieving CenturyLink of unbundling obligations for certain high capacity UNEs.

Provided below is your carrier-specific fiber-based collocation data on which CenturyLink is relying for its determination of wire center non-impairment. Please review this data and contact CenturyLink by no later than June xx, 2017, if you disagree with the fiber-based collocation designation and you have information to support this position or if there is some inaccuracy in the information CenturyLink has on file identifying legal ownership.

CLEC Name	State	WC CLLI	CO Name	Type of Collocation
[REDACTED]	OR	[REDACTED]	Medford	Cageless

**By close of business on June 15, 2017, please send to CenturyLink via certified mail a letter that includes:**

- a. A verification of the ownership/relationship information described above, and;
- b. Additional information about other ownership relationships that may have an impact on CenturyLink's fiber collocation customer records for this wire center, if any, and;
- c. A confirmation that these relationships meet the requirements of the FCC's Order and;
- d. A validation of the fiber-based collocation data as described above.
- e. Corrections if any errors are contained in the information provided.

**Please address the letter to:**

Renee Albersheim  
CenturyLink  
930 15<sup>th</sup> Street, 6<sup>th</sup> Floor  
Denver, CO 80202

If you have any questions or would like to discuss this request, please contact Renee Albersheim via email:  
[Renee.Albersheim@centurylink.com](mailto:Renee.Albersheim@centurylink.com)

Sincerely,

CenturyLink Corporation

**Announcement Date:** May 15, 2017  
**Effective Date:** NA  
**Document Number:** CLEC\_Legal\_Ownership  
**Notification Category:** Network Notification  
**Target Audience:** [REDACTED]  
**Subject:** CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested

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CLEC Name	State	WC CLLI	CO Name	Type of Collocation
[REDACTED]	OR	[REDACTED]	Oregon City	Cageless

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**Subject:** CLEC Legal Ownership Information and Fiber-based Collocation Validation - Action Requested

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CLEC Name	State	WC CLLI	CO Name	Type of Collocation
[REDACTED]	OR	[REDACTED]	Baker-Sumpter	Cageless
[REDACTED]	OR	[REDACTED]	Hermiston	Cageless
[REDACTED]	OR	[REDACTED]	Pendleton	Cageless

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**Target Audience:** [REDACTED]  
**Subject:** [REDACTED] on and Fiber-based Collocation Validation - Action Requested

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CLEC Name	State	Type of Collocation	CO Name	CLLI
[REDACTED]				
[REDACTED]	OR	Cageless	Pendleton	[REDACTED]



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				Type of

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