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Carla M. Butler
Lead Paralegal

April 26, 2006

Annette Taylor
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: UM 1251

Dear Ms. Taylor:

Enclosed please find an original and five (5) copies of Qwest's Corrected Response to the Public Utility Commission's Bench Request No. 01-001.

If you have any question, please do not hesitate to give me a call.

Sincerely,



Carla M. Butler

CMB:

Enclosures

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QWEST CORPORATION

DOCKET: UM 1251
 INTERVENOR: Bench Requests
 REQUEST NO: BCH 01-001S1

REQUEST:

Please provide a list of wire centers Qwest Corporation's (Qwest) service territory in Oregon that will be designated as "non-impaired" pursuant to the final rule in Appendix B of the FCC's Triennial Review Remand Order (TRRO) and specifically identify each wire center on the list for DS1 and DS3 Loops, and DS1, DS3 and Dark Fiber transport.

RESPONSE:

Following is a list of the wire centers in Qwest's service territory in Oregon that are designated as non-impaired pursuant to 47 C.F.R. §51.319.

STATE	Wire Center Name	Wire Center CLLI8 Code	Wire Center Classification for Transport Non-Impairment	No Requirement to Unbundle the following:
OR	Eugene 10th Ave	EUGNOR53	Tier 1	
OR	Medford	MDFDOR33	Tier 1	
OR	PTLD Belmont	PTLDOR13	Tier 1	
OR	PTLD Capitol	PTLDOR69	Tier 1	DS1 & DS3 Loops
OR	Salem State (Main)	SALMOR58	Tier 1	
OR	Bend	BENDOR24	Tier 2	
OR	PTLD Alpine	PTLDOR11	Tier 2	

For DS1 unbundled dedicated transport relief, the FCC Rule requires that both ends of a requested route/circuit must be classified as Tier 1 wire centers. Tier 1 wire centers are those wire centers that contain at least four (4) fiber-based collocators or 38,000 business lines. As an example, Qwest is relieved of its DS1 unbundled dedicated transport obligations for circuits between Eugene 10th Ave and Medford because each of those Wire Centers meets the FCC's criteria to be classified as a Tier 1 wire center.

For DS3 unbundled dedicated transport relief, the FCC Rule requires that both ends of a requested route/circuit must be classified as either a Tier 1 or a Tier 2 wire center. Tier 2 wire centers are those wire centers that contain at least four (4) fiber-based collocators or 24,000 business lines. This same criteria also applies to relief for unbundled dark fiber transport. As an example, Qwest is relieved of its DS3 unbundled dedicated transport/dark fiber transport obligations for circuits between Bend and Portland Alpine because both of those wire centers are classified as Tier 2 wire centers. Qwest would also be relieved of its DS3 unbundled dedicated transport/dark fiber transport obligation between Bend and Medford because each end of the circuit is located in a wire center that meets the FCC's criteria as either a Tier 1 or a Tier 2 wire center. Tier 1 wire centers, by definition, also qualify as Tier 2 wire centers.

For unbundled DS1 loop relief, the FCC's rules require that a wire center must have at least 60,000 business lines AND at least four (4) fiber-based collocators. For unbundled DS3 loop relief, the FCC's rules require that a wire center must have at least 38,000 business lines AND at least four (4) fiber-based collocators. Applying this criteria to its Oregon wire centers,

Qwest is relieved of its obligation to provide DS1 and DS3 loops in only one wire center - Portland Capitol.

Respondent: Lisa Hensley-Eckert

CORRECTED RESPONSE DATED 4/26/06:

Following is a list of the wire centers in Qwest's service territory in Oregon that are designated as non-impaired pursuant to 47 C.F.R. §51.319.

STATE	Wire Center Name	Wire Center CLLI8 Code	Wire Center Classification for Transport Non-Impairment	No Requirement to Unbundle the following:
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OR	PTLD Belmont	PTLDOR13	Tier 1	
OR	PTLD Capitol	PTLDOR69	Tier 1	DS1 & DS3 Loops
OR	Salem State (Main)	SALMOR58	Tier 1	
OR	Bend	BENDOR24	Tier 2	
OR	PTLD Alpine	PTLDOR11	Tier 2	

For DS1 unbundled dedicated transport relief, the FCC Rule requires that both ends of a requested route/circuit must be classified as Tier 1 wire centers. Tier 1 wire centers are those wire centers that contain at least four (4) fiber-based collocators or 38,000 business lines. As an example, Qwest is relieved of its DS1 unbundled dedicated transport obligations for circuits between Eugene 10th Ave and Medford because each of those Wire Centers meets the FCC's criteria to be classified as a Tier 1 wire center.

For DS3 unbundled dedicated transport relief, the FCC Rule requires that both ends of a requested route/circuit must be classified as either a Tier 1 or a Tier 2 wire center. Tier 2 wire centers are those wire centers that contain at least three (3) fiber-based collocators or 24,000 business lines. This same criteria also applies to relief for unbundled dark fiber transport. As an example, Qwest is relieved of its DS3 unbundled dedicated transport/dark fiber transport obligations for circuits between Bend and Portland Alpine because both of those wire centers are classified as Tier 2 wire centers. Qwest would also be relieved of its DS3 unbundled dedicated transport/dark fiber transport obligation between Bend and Medford because each end of the circuit is located in a wire center that meets the FCC's criteria as either a Tier 1 or a Tier 2 wire center. Tier 1 wire centers, by definition, also qualify as Tier 2 wire centers.

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CERTIFICATE OF SERVICE

UM 1251

I hereby certify that on the 26th day of April 2006, I served the foregoing QWEST CORPORATION'S CORRECTED RESPONSE TO COMMISSION BENCH REQUEST NO. 01-001 in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. post office at Portland, Oregon.

*Covad Communications Co.
Gregory Diamond
7901 E. Lowry Blvd.
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*Sarah Wallace
Davis Wright Tremaine
1300 SW Fifth Avenue
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*Karen L. Clauson
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Charles Best
Electric Lightwave, LLC.
P.O. Box 8905
Vancouver, WA 9868-8905

DATED this 26th day of April, 2006.

QWEST CORPORATION



By: _____
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