



Qwest

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Carla M. Butler

Lead Paralegal

April 19, 2007

Frances Nichols Anglin
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: UM 1251

Dear Ms. Nichols Anglin:

Enclosed for filing please find an original and (5) copies of Qwest Corporation's Compliance Filing of Initial Wire Centers that are Non-Impaired Under the *Trro* Pursuant to Order No. 07-109, along with a certificate of service.

Exhibits A and B are Highly Confidential, and Exhibit C is Confidential. Exhibits are printed on pink and yellow paper, respectively, and sealed in separate envelopes.

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

Sincerely,

A handwritten signature in black ink that reads "Carla". The signature is written in a cursive, flowing style.

Carla M. Butler

CMB:

Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1251

In the Matter of <i>TRRO</i> /Request for Commission Approval of Wire Center Lists submitted on behalf of the Joint CLECs	QWEST'S COMPLIANCE FILING OF INITIAL WIRE CENTERS THAT ARE NON-IMPAIRED UNDER THE <i>TRRO</i> PURSUANT TO ORDER NO. 07-109
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Pursuant to the Commission's Order No. 07-109, Qwest Corporation ("Qwest") hereby makes its compliance filing of initial wire centers that are non-impaired under the Federal Communications Commission's ("FCC's") *Triennial Review Remand Order* ("*TRRO*").

BACKGROUND RE ORDER NO. 07-109 AND COMPLIANCE FILING

On March 20, 2007, the Commission issued Order No. 07-109 ("Order"). In the Order, the Commission ruled that 2004 ARMIS 43-08 data is the appropriate vintage to determine whether a given wire center is on the initial list of non-impaired wire centers pursuant to the requirements of the *TRRO*. Thus, the Commission ruled 2004 ARMIS 43-08 data shall be used for this proceeding, instead of the 2003 ARMIS 43-08 data that Qwest had used for its initial list of non-impaired wire centers. See Order, p. 7 (Issue 1). The Commission then ordered that "within 30 (thirty) days of the effective date of this Order, Qwest shall submit a revised list of wire centers, including their classification and the bases therefore, supported by appropriate data, consistent with the findings and conclusions of this Order." Order, p. 20, Ordering Clause 2.

Attached as Exhibits A and B are the following spreadsheets:

- Exhibit A Qwest Response to Joint CLEC Data Request 01-033S1, Highly Confidential Attachment A (UNE-L and EEL backup)

- Exhibit B Qwest Response to Joint CLEC Data Request 01-034S2 - Confidential Attachment A (Actual ARMIS retail business line counts - see "Sum of ARMIS Qty" column, which includes business and public retail lines)

With respect to Exhibits A and B, Qwest had previously provided these responses to the Joint CLECs' data requests in this docket, based on the Commission's ruling on the CLECs'

motion to compel. These responses allowed all parties to calculate actual ARMIS quantities for 2004, in accordance with the requirements of the Order. In addition, Qwest has provided a copy of these spreadsheets to Joint CLEC counsel and explained the data. Further, as the Commission can determine by reviewing the attached exhibits, use of 2004 ARMIS 43-08 data instead of the 2003 ARMIS 43-08 data that Qwest had previously used does not have any material effect on the non-impairment status of the wire centers that Qwest had designated as non-impaired based on business line counts. Qwest does not believe the Joint CLECs would disagree or object.

In addition, with respect to Issue 2, which dealt with the proper means to calculate business line counts, and whether Qwest's business line counts in the wire centers that Qwest designated wire centers meet the *TRRO* non-impairment threshold (Order, pp. 7-9), the Commission required the parties to submit updated business line counts for the Portland Alpine and Bend wire centers. Specifically, the Commission ruled:

We direct the parties to jointly submit new business line data for the Bend and Portland Alpine wire centers. The submission shall utilize business line counts, as defined in paragraph 105 of the TRO, taken from the 2004 ARMIS 43-08 report. The line counts for each wire center shall include only lines actually used to serve customers and shall exclude spare capacity, as measured in voice-grade equivalents. Order, p. 7; see also Order, p. 20, Ordering Clause 2.

Accordingly, Qwest has submitted updated wire center data for the Portland Alpine and Bend wire centers as the Order directed. See Ex. C, Summary of Business Line Counts-- 2004 Actual ARMIS, for these two wire centers (which Qwest has shared with Joint CLEC counsel). Again, the updated wire center data for these two wire centers as the Order directed does not have any material effect on the non-impairment status of the wire centers Qwest had previously designated as non-impaired based on business line counts. Specifically, both wire centers meet the 24,000 business line threshold for DS3 transport and dark fiber transport (26,231 for Bend and 26,561 for Portland Alpine). In fact, the business line counts actually increased using 2004 ARMIS 43-08 data. Again, Qwest does not believe the Joint CLECs would disagree or object.

CONCLUSION

Qwest respectfully submits that its compliance filing is consistent with the Order and that such filing shows there is no change in the *TRRO* non-impairment status for the wire centers that Qwest had previously designated as non-impaired under the *TRRO*. Qwest does not believe the Joint CLECs would disagree or object. Thus, Qwest respectfully requests the Commission affirmatively find the following initial wire centers to be designated as non-impaired:

(1) the Portland Capitol wire center meets the *TRRO* non-impairment standard for both DS1 and DS3 unbundled loops (*TRRO*, ¶¶ 178, 174) [undisputed in the docket];

(2) four Oregon wire centers (Eugene 10th Avenue, Portland Belmont, Portland Capitol and Salem State (Main)) meet the DS1 transport threshold for “Tier 1” non-impairment status (*TRRO*, ¶ 126) [undisputed in the docket], and

(3) three Oregon wire centers (Bend, Portland Alpine and Medford) meet the DS3 and dark fiber transport threshold for “Tier 2” non-impairment status (*TRRO*, ¶¶ 118, 129, 133) [undisputed as to Bend and Alpine, and expressly shown in Exhibit C, while Medford is Tier 2 based on the Order, p. 11].

Dated: April 19, 2007

Respectfully submitted,
QWEST CORPORATION



By _____
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Attorney for Qwest Corporation

CERTIFICATE OF SERVICE

UM 1251

I hereby certify that on the 19th day of April, 2007, I served the foregoing QWEST CORPORATION'S COMPLIANCE FILING OF INITIAL WIRE CENTERS THAT ARE NON-IMPAIRED UNDER THE *TRRO* PURSUANT TO ORDER NO. 07-109 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.
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DATED this 19th day of April, 2007.

QWEST CORPORATION



By: _____

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