

QWEST CORPORATION

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

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

QWEST CORPORATION

DOCKET: UM 1251
INTERVENOR: Bench Requests
REQUEST NO: BCH 01-002

REQUEST:

Please identify for each wire center whether it is classified as a Tier 1 or Tier 2 wire center, and whether the calculation is based on the number of fiber-based collocators (include the names of the collocators), or the number of business lines (line counts by each carrier), or both.

RESPONSE:

See the tier designation provided as Attachment A for a list of each wire center, its wire center classification and whether the calculation is based on the number of fiber-based collocators, the number of business lines, or both.

For a list of the fiber-based collocators and the number of fiber-based collocators in each Non-impaired wire center, please see HIGHLY CONFIDENTIAL Attachment B.

Business line counts include (1) CLEC UNE-L counts (including EEL), (2) CLEC business UNE-P counts, and (3) Qwest business line counts.

See Highly Confidential Attachment C for the UNE-L/EEL loop counts for each CLEC. The line counts for each CLEC are provided to those attorneys and witnesses who are qualified to review Highly Confidential Information and have signed Appendix B of the modified protective order in this docket (Order No. 06-141, issued on March 24, 2006), as well as to the Commission as Highly Confidential Information pursuant to Order No 06-141.

See Confidential Attachment D which provides the number of business UNE-P loops by wire center.

The CLEC line counts in Highly Confidential Attachment C and Confidential Attachment D, coupled with the Qwest line counts provided in response to BCH 01-003(vii) produce the total line counts Qwest relied upon in determining tier designation for each wire center (Total business lines are provided in response to BCH 01-003(v)).

Respondent: Rachel Torrence
Bob Brigham

QWEST CORPORATION

DOCKET: UM 1251
INTERVENOR: Bench Requests
REQUEST NO: BCH 01-003

REQUEST:

For each of the wire centers listed as "non-impaired" in Oregon, please provide a descriptive explanation and data necessary for the Commission and other participants to validate. The underlying data, at minimum, should include the following:

- (i) The total number of fiber-based collocators as defined in 47 C.F.R. § 51.5.
- (ii) The date on which the number of fiber-based collocators was determined.
- (iii) The name of each fiber-based collocator.
- (iv) If Qwest requested affirmation from a carrier regarding whether or not the carrier, if included in part (iii) above, was a fiber-based collocator, please provide documents to support whether the carrier affirmed, denied or did not respond to Qwest's request.
- (v) The total number of business lines as defined in 47 C.F.R. § 51.5.
- (vi) The date on which the business line counts data was calculated. Note: If different components of the business line counts come from sources representing different points in time, then each component should be identified and the corresponding date for each component provided.
- (vii) Total Qwest business switched access lines.
- (viii) If the methodology used to determine the line counts in (vii) above differ from the methodology used to determine switched business line counts for ARMIS 43-08, describe the differences and any data that would allow the Commission or participants to reconcile this data.
- (ix) Total UNE Loops for each CLEC.
- (x) Number of UNE Loops, for each CLEC, provided in combination with Qwest switching (e.g. UNE-P, QPP, or other Qwest Commercial arrangement).
- (xi) Number of UNE Loops, for each CLEC, where Qwest does not provide switching.
- (xii) If different from (x) above, the number of business loops, for each CLEC, provided in combination with Qwest switching (e.g. UNE-P, QPP, or other Qwest Commercial arrangement). If this information is not available, indicate whether the response to (x) includes both business and residential loops.
- (xiii) If different from (xi) above, the number of switched business loops, for each CLEC, where Qwest does not provide switching. If this information is not available, indicate whether the response to (xi) includes both business and residential loops, switched and non-switched loops.
- (xiv) If the total of UNE Loops in (x) and (xi) above does not equal (ix) above, explain the difference, including any data that would allow participants to reconcile this data.
- (xv) Provide all underlying data, calculations and any description used to count digital access lines on a 64-kbps-equivalent basis for the counts in (vii) and (xi) above.

(xvi) Verify that line counts associated with remote switch locations are associated with the remote and not the host switch. If this is not the case, explain why not.

RESPONSE:

Please refer to the testimony of Mr. Robert Brigham for a "descriptive explanation" of the business line data provided by Qwest. Please refer to the testimony of Ms. Rachel Torrence for a "descriptive explanation" of the collocation data provided by Qwest.

(i) See Highly Confidential Attachment B provided in response to BCH 01-002 which includes a list of all fiber based fiber-based collocators located in the non-impaired wire centers.

(ii) The fiber based fiber-based collocators were operating as of March 11, 2005.

(iii) See Highly Confidential Attachment B provided in response to BCH 01-002 which includes a list of all fiber-based collocators in the non-impaired wire centers.

(iv) Qwest sent a letter to each CLEC that was identified as operating a fiber-based collocation within a Qwest Oregon wire center. Six of the 14 collocators identified in (i) responded. HIGHLY CONFIDENTIAL Attachment A is the correspondence between Qwest and the responding CLECs.

(v) See Confidential Attachment B which includes a list of all business line counts in the non-impaired wire centers.

(vi) Business line totals were based on December 2003 data.

(vii) See Confidential Attachment C for total ILEC business switched access lines.

(viii) In ARMIS 43-08, Qwest reports the number of circuits attributed to DS1 and DS3s based on the actual channels used by the customer. The methodology dictated by FCC rule for counting DS1 and DS3 circuits under the TRRO is different. Rather than counting the actual number of circuits activated, the FCC rule requires that the count include the full capacity of the DS1 or DS3. Therefore, a DS1 circuit was counted as the equivalent of 24 business lines, and a DS3 was counted as 672 business lines. Qwest removed the ARMIS count of DS1 and DS3, and replaced them with the FCC capacity amount to avoid double counting. Please see Confidential Attachment D for underlying data.

(ix) See Highly Confidential Attachment C provided in response to BCH 01-002.

(x) Please see Confidential Attachment D provided in response to BCH 01-002 for the number of business UNE-P loops. The methodology used to develop business UNE-P lines is described in the testimony of Mr. Robert Brigham. Based on this methodology, the UNE-P business line count is not provided on a CLEC-specific basis.

(xi) See Highly Confidential Attachment C provided in response to BCH 01-002.

(xii) There is no difference, as the response to (x) includes all business UNE-P loops.

(xiii) There is no difference, as the response to (xi) includes all UNE-L loops. Please refer to the testimony of Mr. Robert Brigham for a description of the methodology used to develop UNE-L counts.

(xiv) The response to (x) identifies UNE-P loops, and the response to (xi) identifies UNE-L loops. The response to (ix) identifies the same UNE-L loops that are identified in (xi). Therefore, the sum of sum of (x) and (xi) does not equal (ix). In addition, UNE-P loops in (x) are not broken out by CLEC.

(xv) The response to (vii) identifies Qwest business switched access lines (Confidential Attachment C), which are displayed in more detail in Confidential Attachment D. Confidential Attachment E provides the underlying data and calculations used to derive the quantities of Qwest business lines in Confidential Attachments C and D. The response to (xi) identifies UNE-L lines, and refers to Highly Confidential Attachment C provided in response to BCH 01-002. This attachment identifies the UNE-L quantities and the underlying data and calculations.

(xvi) Qwest did not have any host/remote arrangements in the Oregon non-impaired wire centers with CLEC presence.

Respondent: Rachel Torrence
Bob Brigham
Lisa Hensley-Eckert

QWEST CORPORATION

DOCKET: UM 1251
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REQUEST NO: BCH 01-004

REQUEST:

If the calculation of number of lines (or inclusion of certain lines) is based on a directive from the FCC as Qwest has previously indicated, please provide the detailed citations of the FCC's decision(s).

RESPONSE:

The directive from the FCC can be found at FCC-04-290 "Triennial Review Order on Remand", Appendix B, Final Rules section 51.5, definition of "business line." See also, paragraph 105 of that same order for the FCC's discussion of the methodology for the business line count.

Respondent: Lisa Hensley-Eckert

WIRE CENTER	WIRE CENTER CLLI8 CODE	WIRE CENTER CLASSIFICATION	BASIS FOR CLASSIFICATION (Collos/Bus. Lines/Both)
EUGENE 10 th AVE	EUGNOR53	Tier 1	Business Lines
MEDFORD	MDFDOR33	Tier 1	Fiber Collo
PTLD BELMONT	PTLDOR13	Tier 1	Fiber Collo
PTLD CAPITOL	PTLDOR60	Tier 1	Both (for DS1 & DS3 loops) Meets Tier 1 designation with either
SALEM STATE (MAIN)	SALMOR58	Tier 1	Business Lines
BEND	BENDOR24	Tier 2	Business Lines
PTLD ALPINE	PTLDOR11	Tier 2	Business Lines