

Qwest Corporation
421 SW Oak Street
Room 810
Portland, OR 97204
Telephone: 503-242-5420
Facsimile: 503-242-8589
e-mail: Carla.Butler@qwest.com



Alex M. Duarte
Corporate Counsel

October 5, 2006

Ms. Cheryl Walker
Oregon Public Utility Commission
Suite 215
550 Capitol Street NE
Salem, OR 97301

Re: Wholesale promotions - Qwest Collocation Promotion per OAR 860-016-0021

Dear Ms. Walker:

As we have previously discussed with Presiding Administrative Law Judge Michael Grant and with Staff, the Commission has promulgated temporary rules for ILEC submissions of wholesale promotions available to CLECs under interconnection agreements pursuant to section 251 of the Telecommunications Act of 1996. The temporary rule is OAR 860-016-0021, which provides as follows:

860-016-0021 Wholesale

Promotions

- (1) A carrier intending to provide a wholesale promotion that would modify the terms of existing carrier-to-carrier agreements must provide the Commission notice of the offering at least 15 days prior to the effective date of the promotion. The notice shall include:
 - (a) Language used to describe the promotion;
 - (b) The terms and conditions to be used for the promotional offering; and
 - (c) A description of the means used to notify carriers of the promotion.
- (2) The carrier shall file an original plus two copies of the notice and a completed Carrier-to-Carrier Agreement Checklist. The carrier shall also submit a copy of the notice and checklist in electronic format compatible with Adobe Acrobat Reader or Rich Text Format. The Commission will post the notice and checklist on its Internet website.
- (3) The public may file written comments on the promotional offering within 10 days of the filing date of the notice, unless the Commission establishes a different time limit in an individual case.

- (4) The Commission will acknowledge the promotional offering unless it finds that the offering, if filed as an amendment to an interconnection agreement, would be subject to rejection under OAR 860-016-0020(6).
- (5) If another carrier accepts the promotional offering, the carrier offering the promotion and the accepting carrier shall file any required amendment to an existing carrier-to-carrier agreement for approval pursuant to OAR 860-016-0020. Any such amendment entered into during the identified promotional period and submitted for Commission approval within 10 days of execution will be deemed timely filed.
- (6) The Commission will accept or reject an amendment adopting the terms of the promotional offering within 10 days, pursuant to standards set forth in OAR 860-016-0020.

Pursuant to OAR 860-016-0021, Qwest is submitting to the Commission notice of a promotional offering of available collocation sites that will be effective on October 1, 2006. Accordingly, we enclose (1) a template amendment to an interconnection agreement reflecting a CLEC's acceptance of such promotional offering, including the relevant terms and conditions of the promotional offering, (2) a Wholesale Announcement to Carriers that describes Qwest's "Collocation Availability Inventory" promotion, and (3) a template Carrier-to-Carrier Agreement Checklist. We are also sending to the Commission these documents in Adobe Acrobat Reader format. The means by which Qwest has used to notify carriers of the promotion has been through the standard email notification that Qwest's Wholesale department makes to all CLECs with interconnection agreements. The promotional offering is also on Qwest's Wholesale Internet website, <http://www.qwest.com/wholesale/>. Pursuant to OAR 860-016-0021(4), the Commission will acknowledge the promotional offering unless it finds that the offering, if filed as an interconnection agreement, would be subject to rejection under OAR 860-016-0020(6).

Finally, there is one CLEC in Oregon that has recently signed the amendment, and Qwest is submitting this amendment (and the Carrier-to-Carrier Checklist) for Commission approval, pursuant to OAR 860-016-0021(5). Qwest will continue to do so for other CLECs who execute the amendment. Pursuant to OAR 860-016-0021(6), the Commission will accept or reject an amendment adopting the terms of the promotional offering within 10 days, pursuant to standards set forth in OAR 860-016-0020.

Thank you for your attention to this matter. If you have any questions about this request, please feel free to call me.

Very truly yours,



Alex M. Duarte

Enclosures

**Special Promotion for Available Inventory Collocation Sites Amendment
To the Interconnection Agreement between
Qwest Corporation and _____
For the State of _____**

This "Amendment" to the Interconnection Agreement between Qwest Corporation ("Qwest") and _____ ("CLEC") provides limited time promotional rates for Available Inventory Collocations on Available Inventory Sites identified at http://www.qwest.com/wholesale/collocation_space.html under the "Collo Classifieds – Qwest Postings" listing. The Promotional Rates below do not apply to any collocation facilities listed under the "Collo Classifieds – CLEC Postings" listing on the aforementioned internet site. The Parties acknowledge that they have previously entered into an Interconnection Agreement in the applicable state.

Limited Time Offer. The promotional rates provided for herein apply only to valid (complete) Available Inventory applications received between October 1, 2006 and December 31, 2006. The collocation applications must be submitted through the normal channel via rfsmet@qwest.com.

Requirement for Collocation Available Inventory Amendment. To receive the promotional rates, CLEC must execute and submit this Amendment to Qwest, and CLEC must either: (1) already have incorporated Collocation Available Inventory language and rates in your Interconnection Agreement; or (2) execute and submit the Collocation Available Inventory Amendment concurrent with the submission of this executed Amendment.

Non-Conformance Audit. Upon receipt of a complete Collocation Application for a specific Available Inventory Special Site Qwest will perform an audit to identify any items not in compliance with Qwest Collocation Installation guidelines referenced in Qwest Technical Publication 77350. In the verification letter that the CLEC receives, Qwest will include a list of any defects that are the CLEC's responsibility to correct. Upon receipt of the verification letter, CLEC may choose to cancel the request or proceed with the knowledge that CLEC must bring these identified items into compliance within sixty (60) Days following the ready for service date (RFS). The non-conformance audit only applies to Special Sites. This Non-Conformance Audit process applies only to orders for Available Inventory Sites received during the promotional period set forth above.

Promotional Rates. The promotional rates under this Amendment are as follows:

Standard Promotional Discount. Under the Collocation Available Inventory Amendment, Customer receives a discount of fifty percent (50%) off of the nonrecurring charge ("NRC") for reusable elements (e.g. space and terminations) on Available Inventory "Standard Sites" and "Special Sites" under the "Collo Classifieds – Qwest Postings" listing (the "Existing AI Discount"). The Existing AI Discount will be increased from fifty percent (50%) to seventy-five percent (75%) for applications received between October 1, 2006 and December 31, 2006. The QPF is not a discounted item for Available Inventory Sites.

Finished Service Discount. In addition to the Standard Promotional Discount above, CLEC is eligible to receive an additional twenty-five percent (25%) discount to the reusable element NRC (for a total discount of 100% of the NRC for reusable elements) if all the following conditions are met:

1. CLEC must provision at least one (1) DS-1 or higher bandwidth Finished Service (Interconnection Tie Pair (ITP) with the DEMARC outside the collocation) into the Available Inventory Site within thirty (30) Days of receipt of the Collocation site; and
2. CLEC must provide Wholesale Collocation Service Manager with the Customer Carrier Name Abbreviation/Access Customer Name Abbreviation (CCNA/ACNA), purchase order number (PON) and the confirmed Finished Service Qwest circuit identification number within thirty (30) Days of the completion of the Finished Service order; and
3. CLEC must (i) commit to a minimum term agreement on the Finished Service of at least one year and (ii) agree that early termination (TLA) charges will apply if the Finished Service is disconnected prior to the end of the contracted term.

Upon Qwest verification that the above requirements have been fulfilled, Qwest will apply the additional 25% finished Service credit to the CLEC's Collocation invoice within sixty (60) Days of Qwest completing the processing of the Finished Service order. This will bring the total amount of the Reusable Elements NRC discount to 100.

Expiration. The promotional rates for Available Inventory requests will expire on December 31, 2006

Existing Interconnection Agreement. Apart from the rates, terms, and conditions of this Amendment (all of which expire on December 31, 2006), all other rates, terms, and conditions for collocation are contained in the Parties' Interconnection Agreement as amended (including, without limitation, the Collocation Available Inventory Amendment).

State Commission Approval and Implementation. This Amendment is subject to the approval of an applicable state commission. The Parties agree, however, to implement the provisions of this Amendment upon execution.

Entire Agreement. This Amendment (including the Interconnection Agreement as amended, which was incorporated by reference) constitutes the full and entire understanding and agreement between the parties with regard to the subject matter of this Amendment.

CLEC

Qwest Corporation

Authorized Signature

Authorized Signature

Name Printed/Typed

L. T. Christensen
Name Printed/Typed

Title

Director – Interconnection Agreements
Title

Date

Date



Announcement Date: September 1, 2006
Effective Date: N/A
Document Number: PROD.09.01.06.B.001800.New_Price_Promo_Collo_Ava_Inv
Notification Category: Product Notification
Target Audience: CLECs
Subject: New pricing promotion for Collocation Available Inventory

Qwest is pleased to announce a new pricing promotion on Collocation Available Inventory.

Collocation Available Inventory provides the public with information about the availability of (a) returned Collocation sites and elements under Qwest's control ("Qwest Postings") and (b) CLEC controlled sites that may be posted by such controlling CLEC as available for a Transfer of Responsibility ("CLEC Postings"). Collocation Available Inventory product specifics and available sites are posted on Qwest's Wholesale web site located at:

http://www.qwest.com/wholesale/collocation_space.html .

With this promotion, CLECs have an opportunity to receive up to 75% off of the nonrecurring charge ("NRC") for reusable elements (e.g. space and terminations) on applications submitted between October 1, 2006 and December 31, 2006 for Available Inventory Sites identified at: http://www.qwest.com/wholesale/collocation_space.html under the "Collo Classifieds – Qwest Postings" listing. **This discount can be increased to 100% off of the NRC for reusable elements if you purchase a DS-1 or higher bandwidth Finished Service Private Line into the collocation site within 30 days of your receipt of the site. The special promotion described above does not apply to any collocation facilities listed under the "Collo Classifieds – CLEC Postings" listing on the at http://www.qwest.com/wholesale/collocation_space.html internet site. Additional terms and conditions apply and are outlined in the Special Promotion for Available Inventory Collocation Sites Amendment available here:**

<http://www.qwest.com/wholesale/clecs/colloavailableinventoryovr.html>.

This represents Qwest's most aggressive NRC pricing discount on collocation to date and creates a very time and cost efficient way for you to expand your facilities-based local footprint.

Please contact your Qwest Collocation Service Manager for additional details.

Sincerely

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

If you would like to unsubscribe to mailouts please go to the "Subscribe/Unsubscribe" web site and follow the unsubscribe instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>

CARRIER-TO-CARRIER AGREEMENT CHECKLIST

INSTRUCTIONS: Please complete all applicable parts of this form and submit it with related materials when filing a carrier-to-carrier agreement pursuant to 47 U.S.C. 252 and OAR 860-016-0000 et al. The Commission will utilize the information contained in this form to determine how to process the filing. **Unless you request otherwise in writing, the Commission will serve all documents related to the review of this agreement electronically to the e-mail addresses listed below.**

1. PARTIES *Competitive Carrier* *Incumbent Local Exchange Carrier*

Name of Party: _____ Qwest Corporation _____

Contact for Processing Questions:

Name: _____ Carla Butler _____

Telephone: _____ (503) 242-5420 _____

E-mail: _____ carla.butler@qwest.com _____

Contact for Legal Questions (if different):

Name: _____ _____

Telephone: _____ _____

E-mail: _____ _____

Other Persons wanting E-mail service of documents (if any):

Name: _____ Don Mason / Steve Dea _____

E-mail: _____ don.mason@qwest.com / intagree@qwest.com _____

2. TYPE OF FILING NOTE: Parties making multiple requests (such as seeking to adopt a previously approved agreement and Commission approval of new negotiated amendments to that agreement) should submit a separate checklist for each requested action.

Adoption: Adopts existing carrier-to-carrier agreement filed with Commission.

- Docket ARB _____
- Parties to prior agreement _____ & _____
- Check one:
 - Adopts base agreement only; or
 - Adopts base agreement and subsequent amendments approved in Order No(s) _____

New Agreement: Seeks approval of new negotiated agreement.

- | | |
|--|--|
| • Does filing replace an existing agreement between the parties? | • If filing involves Qwest Communications, does it utilize the terms of an SGAT? |
| • <input type="checkbox"/> NO | • <input type="checkbox"/> NO |
| • <input type="checkbox"/> YES, Docket ARB _____ | • <input type="checkbox"/> YES, Revision _____ |

Amendment: Amends an existing carrier-to-carrier agreement.

Docket ARB _____

Other: Please explain.

4th Quarter 2006 - Special Promotion for Available Inventory Collocation Sites