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Carla M. Butler
Lead Paralegal

May 24, 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 Response to the Public Utility Commission's Bench Request No. 01-003S1. Attachment A is Highly Confidential, printed on pink paper, and sealed in a separate envelope.

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

Sincerely,

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

Carla M. Butler

CMB:
Enclosures

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QWEST CORPORATION

DOCKET: UM 1251
INTERVENOR: Bench Requests
REQUEST NO: BCH 01-003S1

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

SUPPLEMENTAL RESPONSE DATED 5/24/06:

(iv) Please see Supplemental HIGHLY CONFIDENTIAL Attachment A. Portions of this document were inadvertently omitted from the original Highly Confidential Attachment A that was served on April 21, 2006.

Respondent: Rachel Torrence

CERTIFICATE OF SERVICE

UM 1251

I hereby certify that on the 24th day of May 2006, I served the foregoing QWEST CORPORATION'S RESPONSE TO COMMISSION BENCH REQUEST NO. 01-003S1 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.

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DATED this 24th day of May, 2006.

QWEST CORPORATION



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