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Carla M. Butler
Lead Paralegal

June 29, 2007

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

Re: UM 1326

Dear Ms. Nichols Anglin:

Enclosed for filing please find an original and (5) copies of Qwest Corporation's Filing For Commission Approval of 2007 Additions to Non-Impaired Wire Center List, With Supporting Data, along with a certificate of service.

This filing includes Highly Confidential material. Pursuant to (3) of Protective Order No. 07-281, the Highly Confidential material is printed on green paper, and sealed in an appropriately labeled envelope. According to the process explained in the filing, Qwest will only provide copies of the Highly Confidential documents to those who have signed Protective Order No. 07-281.

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

Sincerely,



Carla M. Butler

CMB:

Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1326

In the Matter of

QWEST CORPORATION

Petition for Commission Approval of 2007
Additions to Non-Impaired Wire Center List

**QWEST CORPORATION'S FILING FOR
COMMISSION APPROVAL OF 2007
ADDITIONS TO NON-IMPAIRED WIRE
CENTER DESIGNATIONS, WITH
SUPPORTING DATA**

INTRODUCTION

On Friday, June 22, 2007, Qwest Corporation ("Qwest") petitioned the Commission to open a docket for approval of Qwest's 2007 additions to its non-impaired wire center list. The Commission docketed the petition as docket UM 1326 (this proceeding).

The Commission had previously opened a docket in 2006 (docket UM 1251) related to its initial determination on non-impaired wire centers. In docket UM 1251, Qwest and a coalition of CLECs ("the Joint CLECs") reached a joint settlement agreement that has been filed for Commission approval in that docket. As set forth in the settlement agreement, Qwest may request the addition of non-impaired wire centers based in whole or in part upon business line counts at any time up to July 1st of each year, based on prior year line count data, and using an agreed-upon methodology.¹ Through this filing, Qwest asks that the Commission designate the wire centers identified herein as non-impaired.

¹ With respect to fiber-based collocators, Qwest may request the addition of non-impaired wire centers to the Commission-approved wire center list at any time based on the number of fiber-based collocators.

DISCUSSION

I. SUPPORT FOR THE NON-IMPAIRMENT DESIGNATION OF WIRE CENTERS

In support of Qwest's request is the affidavit and attachments of Ms. Rachel Torrence. Ms. Torrence's affidavit and attachments describe and present evidence in support of the inventory of fiber-based collocators in Qwest wire centers used to ascertain the appropriate "tier" designation and subsequent non-impairment designation. Ms. Torrence's affidavit and attachments can be found at Appendix 1.²

II. HIGHLY-CONFIDENTIAL TRADE SECRET DATA

Qwest's request requires the provision of data that include highly-confidential trade secret CLEC data. In order to protect these data from inappropriate disclosure, Qwest asked the Commission to issue a protective order that would provide for the appropriate handling of these confidential data. Because the Commission has issued a modified protective order, Order No. 07-281, in this docket, Qwest provides to the Commission the data supporting its list of additional non-impaired wire centers. Qwest will also provide the data to all CLECs that have provided Qwest with an executed copy of the protective order.

In addition to any formal notice that the CLECs may have received as a part of this proceeding, Qwest also provided a general notice to all CLECs in affected states indicating which wire centers might be included in Qwest's filing. A copy of that notice is attached to this pleading as Appendix 2.

² In other states in which Qwest has presented evidence of non-impaired wire centers to add to the non-impaired wire center list based on the number of business lines, Qwest has also submitted an affidavit of its business line witness, Robert Brigham. However, because the new wire centers that Qwest is adding to the non-impaired wire center list in Oregon is limited to wire centers based on the presence of the requisite numbers of fiber-based collocators, Qwest is not filing an affidavit from Mr. Brigham in Oregon.

In order to expedite provision of data to CLECs, each CLEC requesting the data should provide to Qwest a PDF copy of its signed protective order. That signed agreement should be provided to Stacy Hanson of Qwest at stacy.hanson@qwest.com on or after June 29, 2007, except during the week of July 2-July 6, 2007, during which the PDF should be provided to Kathy Rowley of Qwest at kathy.rowley@qwest.com. The CLEC should also specify the person's name, street address and telephone number to whom the data should be provided by overnight mail.

The wire centers for which Qwest seeks a non-impairment designation are as follows:

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIRMENT FOR
OR	Eugene 10th Ave	EUGNOR53	Tier 1	DS1 and DS3 Transport; Dark Fiber; DS3 Loops
	Roseberg	RSBGOR57	Tier 2	DS3 Transport and Dark Fiber
	Salem-Main	SALMOR58	Tier 1	DS1 and DS3 Transport; Dark Fiber; DS3 Loops

CONCLUSION

For the reasons set forth above, Qwest respectfully requests the Commission approve Qwest's 2007 additions to its non-impaired wire center list as specified herein.

Dated: June 29, 2007

Respectfully submitted,

QWEST CORPORATION



By _____

Alex M. Duarte, OSB No. 02045

QWEST

421 SW Oak Street, Room 810

Portland, OR 97204

(503) 242-5623

(503) 242-8589 (facsimile)

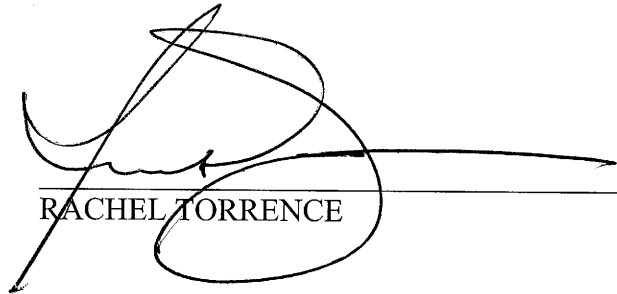
Alex.Duarte@qwest.com

Attorney for Qwest Corporation

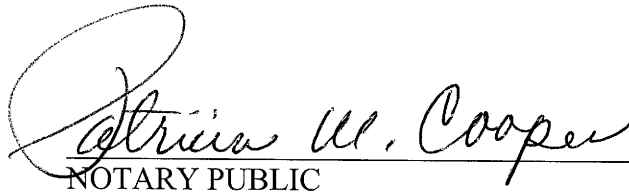
3. In support of the filing, I conducted an inventory of Fiber-Based Collocators in Qwest Wire Centers to ascertain the number of fiber-based collocators in each wire center and the appropriate “Tier” designation (See Attachment A). The Tier was subsequently used to establish Non-Impairment.
4. As part of that inventory, and as required under the terms of the Settlement Agreement, I conducted a physical field verification of the inventoried fiber-based collocators, and cross-referenced the physical inventory data with the corresponding order and construction records and billing data.
5. I researched the actual order records and engineering design and construction records to validate the physical configurations and the presence of an active power supply. I also researched and validated the “in-service date” which is noted on the Collocation Verification Worksheets (included as Attachment B).
6. I also researched the billing records for both the collocation space and the active power supply to the collocation to ensure that it was an active Fiber-Based Collocation.
7. Qwest sent the identified fiber-based collocators a letter asking for further validation of their status as a fiber-based collocator and any updated information with respect to changes in ownership, mergers and/or acquisitions (See Attachment C for a copy of the letter(s), and Attachment D for copies of the correspondence between Qwest and responding CLECs).
8. Qwest undertook a thorough analysis to ensure that the number of Fiber-Based Collocators in Qwest Wire Centers was accurately counted. Its process for identifying qualifying collocators produced an accurate and verified count. This accurate and verified data on the number of Fiber-Based Collocators was one of two factors in determining which Minnesota wire centers were Non-Impaired. The other factor was the number of Business Lines in each Wire Center based on the most recently filed ARMIS 43-08 data. The resulting list of additional Non-Impaired Minnesota Wire Centers, having relied on this accurate and

verified data, is by extension just as accurate and should be validated by this Commission.

DATE: June 28, 2007

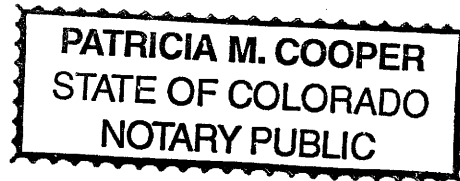

RACHEL TORRENCE

SUBSCRIBED AND SWORN to before me the 28th day of June, 2007.


NOTARY PUBLIC

My Commission Expires:

5-4-2008



Announcement Date: June 22, 2007
Effective Date: N/A
Document Number:
Notification Category: General Notice
Target Audience: CLECs operating in the states of Arizona, Colorado, Minnesota, New Mexico, Oregon, Utah, and Washington
Subject: Additions to Non-Impaired Wire Center Lists

On June 22, 2007 Qwest will file petitions with the following state commissions to open a docket to consider the addition of wire centers to Qwest's Non-Impaired Wire Center List:

- Arizona
- Colorado
- Minnesota
- New Mexico
- Oregon
- Utah
- Washington

Qwest will also request a protective order governing the confidential data supporting these additions to be issued expeditiously.

On June 29, 2007 Qwest will file with the state regulatory commissions of the affected states for approval of these additions to Qwest's Non-Impaired Wire Center List.

Qwest offers this Notice pursuant to the terms and conditions of the Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues entered into by Qwest Corporation and Covad Communications Company and DIECA Communications, Inc. (collectively "Covad"), Eschelon Telecom, Inc. ("Eschelon"), Integra Telecom Holdings, Inc. ("Integra"), McLeodUSA Telecommunications Services, Inc. ("McLeodUSA"), Onvoy, POPP.Com ("POPP"), US Link, Inc. d/b/a TDS Metrocom, Inc. ("TDSM"), and XO Communications Services, Inc. ("XO") on June 20, 2007.

At this time, Qwest anticipates requesting the addition of the following Wire Centers to its Non-Impaired Wire Center Lists as having met the loop thresholds identified in CFR 47 §51.319(a)(4)(i) for DS1 Loops, or the loop thresholds identified in CFR 47 §51.319(a)(5)(i) for DS3 Loops, or the Tier 1 or Tier 2 Wire Center designations as defined in §51.319(e)(3):

STATE	WIRE CENTER	CLLI8	TIER	NO IMPAIREMENT FOR
AZ	Chandler Main	CHNDAZMA	Tier 2	DS3 Transport & DF
	Chandler West	CHNDAZWE	Tier 2	DS3 Transport & DF
	Phoenix Cactus	PHNXAZCA	Tier 2	DS3 Transport & DF
	Phoenix Greenway	PHNXAZGR	Tier 2	DS3 Transport & DF
	Phoenix Southeast	PHNXAZSE	Tier 1	DS1 and DS3 Transport & DF
	Phoenix Sunnyslope	PHNXAZSY	Tier 2	DS3 Transport & DF
	Phoenix West	PHNXAZWE	Tier 2	DS3 Transport & DF

	Superstition West	SPRSAZWE	Tier 2	DS3 Transport & DF
CO	Broomfield Main	BRFDCOMA	Tier 2	DS3 Transport & DF
	Colo. Springs East	CLSPCOEA	Tier 2	DS3 Transport & DF
	Dry Creek	DNVRCODC	Tier 1	DS1 and DS3 Transport; DF; DS1 & DS3 Loops
	Aberdeen	ENWDCOAB	Tier 1	DS1 and DS3 Transport & DF
MN	Brainard	BRNRMNBR	Tier 1	DS1 and DS3 Transport & DF
	Duluth Melrose	DLTHMNME	Tier 2	DS3 Transport & DF
	Eagan-Lexington	EAGNMNLB	Tier 1	DS1 and DS3 Transport & DF
	Eden Prairie	EDPRMNEP	Tier 1	DS1 and DS3 Transport & DF
	Owatonna	OWTNMNOW	Tier 2	DS3 Transport & DF
	Fernbrook	PLMOMNFE	Tier 2	DS3 Transport & DF
	St.Paul-Midway	STPLMNMI	Tier 2	DS3 Transport & DF
OR	Eugene 10 th Ave	EUGNOR53	Tier 1	DS1 & DS3 Transport; DF; DS3 Loops
	Roseberg	RSBGOR57	Tier 2	DS3 Transport & DF
	Salem-Main	SALMOR58	Tier 1	DS1 & DS3 Transport; DF; DS3 Loops
UT	Midvale Main	MDVAUTMA	Tier 2	DS3 Transport & DF
	Orem Main	OREMUTMA	Tier 2	DS3 Transport & DF
WA	Bellevue Glencourt	BLLVWAGL	Tier 1	DS1 and DS3 Transport; DF
	Orchards	ORCHWA01	Tier 2	DS3 Transport & DF
	Spokane Walnut	SPKNWAWA	Tier 2	DS3 Transport & DF
	Tacoma Fawcett	TACMWafa	Tier 1	DS1 and DS3 Transport & DF

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest Corporation

CERTIFICATE OF SERVICE

UM 1326

I hereby certify that on the 29th day of June, 2007, I served the foregoing QWEST CORPORATION'S FILING FOR COMMISSION APPROVAL OF 2007 ADDITIONS TO NON-IMPAIRED WIRE CENTER LIST, WITH SUPPORTING DATA 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.
Denver, CO 80230

Greg Kopta
Davis Wright Tremaine
1501 4thAve., Suite 2600
Seattle, WA 98101-1688

Karen L. Clauson
Eschelon Telecom, Inc.
730 2nd Avenue S
Suite 900
Minneapolis, MN 55402-2489

Jay Nusbaum
Integra Telecom of Oregon, Inc.
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William A. Haas
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John M. Devaney
Perkins Coie, LLP
607 Fourteenth St., NW
Suite 800
Washington DC 20005-2011

Rex Knowles
XO Communications Svcs., Inc
111 E. Broadway
Suite 1000
Salt Lake City, UT 84111

*Douglas Denney
Eschelon Telecom, Inc.
730 2nd Avenue S
Suite 900
Minneapolis, MN 55402-2489

Kevin Saville
Frontier Communications of
America, Inc.
2378 Wilshire Blvd.
Mound, MN 55364

DATED this 29th day of June, 2007.

QWEST CORPORATION



By: _____

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