Qwest

421 SW Oak Street Room 810 Portland, OR 97204 Telephone: 503-242-5623

Facsimile: 503-242-8589 Email: Alex.Duarte@qwest.com

Alex M. Duarte Corporate Counsel

March 7, 2005

Qwest.

Spirit of Service

Honorable Allan Arlow Administrative Law Judge Public Utility Commission of Oregon P. O. Box 2148 Salem, OR 97308-2148

Re: UX 29-Qwest Submission of CLEC Survey, List of CLECs and Draft Bench Request Dear Judge Arlow:

Pursuant to Your Honor's February 28, 2005 notice of further telephone prehearing conference, we will have a prehearing conference on Wednesday, March 9, 2005. The parties have agreed to discuss, among other things, the bench requests to certain identified competitive providers (CLECs) regarding telecommunications competition in Oregon (otherwise known as the "CLEC Survey"). The parties also agreed during their conference call last week that Qwest would submit the proposed CLEC Survey to Your Honor by close of business today (which Owest encloses herein), in preparation for the March 9th prehearing conference. They also agreed that if the parties were not in complete agreement on the form of the CLEC Survey, they would advise Your Honor by close of business today about any disagreements, and explain their positions about the disputed issues.

As of the date of this letter, it appears that there are now three basic disputes about the form of the CLEC Survey. For example, early last week, Staff (with the concurrence of the CLECs) raised concerns about two aspects of the survey, as described below. Qwest then modified the proposed draft to address Staff's first concern, and then provided certain information regarding Qwest's provisioning of UNE-P and its Qwest Platform Plus<sup>TM</sup> (QPP) replacement product, as well as the transition from UNE-P to OPP, to address the second concern. Owest then asked the parties to respond by the close of business on Friday, March 4, 2005, so that Qwest would know what the issues still in dispute would be, and could discuss them in its comments, as the parties had agreed. Unfortunately, however, Qwest never received any definitive answers by then.

#### **Covad's VoIP question objection**

Thereafter, for the first time, Qwest learned this morning by email that Covad objected to the questions about Voice over Internet Protocol (VoIP) services. I then responded by email about 8:30 this morning that Qwest wanted to know what those objections were. I again reiterated to all parties that Qwest needed to know whether the two other issues were still in dispute, and thus asked all parties to advise us whether these other two issues were still disputed by noon today.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> The only response I received by about 1:30 p.m. this afternoon (while I was finalizing this letter) was from CLEC attorney Sarah Wallace, who left a voicemail message at 11:43 a.m. Ms. Wallace advised that the CLECs that her firm represents still object to question 1 and Attachment A (because they did not believe UNE-P should be

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In any event, Covad's counsel then sent me by email a copy of a 10-page legal brief on its reasons for objecting to the survey's VoIP questions. Since I was out of the office on another matter until noon, I did not see the comments until about 12:20 p.m. Nevertheless, even if I had seen them earlier this morning, Qwest does not believe it is appropriate for Covad to raise its objections to the VoIP question for the first time on the day Qwest would submit the survey and address objections, and then follow up with a 10-page legal brief, without giving Qwest an opportunity to meaningfully respond. Qwest believes that Covad should have advised Qwest about these concerns long before today. On that basis, Qwest objects to Covad's comments, and believes that the Commission has the authority to ask the certified CLECs about these issues, and thus that it should keep the VoIP questions in the survey.<sup>2</sup> If Your Honor is seriously considering removing the VoIP question and attachment, however, Qwest respectfully requests an opportunity to respond to Covad's brief.<sup>3</sup>

Accordingly, on an abundance of caution, and to the extent that Qwest understands Staff's concerns, Qwest sets forth the two *non-VoIP* issues it believes may still be in dispute, and gives its reasons why the CLEC Survey, in its present form, should be the basis of Your Honor's bench requests. Qwest reserves its rights to request further comment in the event that Staff or any other party raises a previously-unstated justification or reason for changing Qwest's proposed survey.

### Questions 1 and 2 (Present activity v. future plans)

On February 28, 2005, Staff advised Qwest that question number 1 should include a part "c." that read as follows: "Would changes to QPP pricing affect your answer to 1a and 1b?" After Qwest explained its concerns to Staff's proposed question (including its vague nature) during the parties' conference call, it appears the parties agree the focus of these questions should not be what the CLECs may be planning on doing in the future (which could be speculative and

considered in this docket), and object to subpart a. of question 2 (because they believed the question on QPP should be limited to what is being currently provided, and should not ask about whether CLECs are accepting new customers). Finally, Ms. Wallace indicated that they could not give Qwest any specific comments until tomorrow, and that they "would rather wait to see what Qwest submits and provide some written comments tomorrow."

<sup>&</sup>lt;sup>2</sup> Qwest also objects to any other late-filed comments, especially since the parties agreed they would submit comments on the issues they had previously raised by the close of business today.

Without waiving its objections to respond to Covad's last-minute comments on VoIP, Qwest notes that the fact is that a number of carriers (including CLECs on the attached list of active CLECs) are now offering VoIP to business customers as a direct substitute for Qwest local exchange switched business services. For example, AT&T has been offering VoIP service to business customers for more than a year. The focus of this docket, from the Commission's standpoint, should be to gauge the extent to which *competition exists* for Qwest's switched business services, regardless of the technology that underlies the competition. The fact that VoIP is early in its life cycle does not dismiss VoIP as a competitive option to any business customer with a broadband internet connection. VoIP is now a very real part of the competitive telecom fabric in Oregon. Ignoring VoIP services would be a disservice to a well-reasoned view of competitive alternatives. Finally, the fact that VoIP is not regulated by this Commission does not mean that the Commission cannot ask the certificated CLECs questions about VoIP. This is a straw man argument, and while the Commission may not have jurisdiction to seek such information from a non-certificated VoIP provider, such as Vonage, an admittedly initial reading of Covad's comments shows that it has not convincingly argued that the Commission cannot ask these questions of the certificated CLECs in Oregon.

<sup>&</sup>lt;sup>4</sup> At the time, questions 1.a. and 1.b. inquired whether the responding CLEC planned to continue to provide service to its existing business customer base via UNE-P and/or Qwest's replacement product QPP when UNE-P was phased out pursuant to the FCC's Triennial Review Order ("TRO"), and whether the responding CLEC had plans to continue to offer service to new business customers (e.g., continue to market its services to business customers not currently subscribing to its services) via UNE-P and/or via QPP when UNE-P was phased out.

not subject to proof), but rather, what they are doing (ordering) today. Thus, on March 3, 2005, Qwest re-wrote the first two questions and asked the parties to advise whether the new questions were acceptable by the close of business on Friday, March 4, 2005.

In any event, Qwest has re-written questions 1 and 2 as follows:

- 1. Using the matrix provided as Attachment A, please report the quantity of business switched access lines <u>as of 12/31/04</u>, for each service category indicated along the horizontal axis at the top of the report, you serve via <u>UNE-Platform</u> services purchased from Qwest.
- a). As of the date of your response to #1 above regarding business services based upon UNE-P, do you accept requests from new business customers (other than those customers you currently serve)? (Emphasis added.)
- 2. Using the matrix provided as Attachment B, please report the quantity of business switched access lines as of 12/31/04, for each service category indicated along the horizontal axis at the top of the report, you serve via <a href="Qwest Platform Plus ("QPP")">Qwest Platform Plus ("QPP")</a> services purchased from Qwest.
- a). As of the date of your response to #2 above regarding business services based upon QPP, do you accept requests from new business customers (other than those customers you currently serve)? (Emphasis added.)

Qwest agrees with Staff and some of the parties that the focus should be on what CLECs are doing today, and Qwest believes that its proposed questions 1 and 2 address that issue, and thus that these questions are appropriate and should be part of the survey. Further, in response to Ms. Wallace's comment today that the question on QPP should be limited to what is being currently provided, and thus should not ask about whether CLECs are accepting new customers, Qwest responds that the CLECs cannot have it both ways- that is, they cannot exclude the current UNE-P line counts, and then exclude information about whether the UNE-P customers will be using QPP in the future. Both questions must be asked to obtain a true picture of the competitive landscape. Finally, any concerns or objections the parties may have to this question go to the *weight of the evidence*, and the parties are certainly free to advocate against such evidence in testimony. The data, however, should be collected so that it is in the record. Thus, Qwest respectfully requests that Your Honor adopt Qwest's proposed CLEC Survey as written.

#### **Attachment A (UNE-P line count information)**

The second dispute centers around Staff's position that the information in this docket should focus on facility-based competition and services or platforms that "Qwest is obligated to provide." Thus, Staff recommended that Attachment A (which asks for UNE-P line counts as of December 31, 2004), and its respective questions (question 1), should be removed from the survey "unless Qwest can demonstrate that it is obligated to provide these services to all CLECs who request these services or platforms."

Qwest responded by advising that pursuant to the FCC's rulings, Qwest is obligated to provide UNE-P until March 2006 (if a CLEC has not made transition arrangements, such as converting from UNE-P to an alternative (like QPP)). Qwest further advised that for QPP, the earliest any of these contracts expire is *July 2008*. Thus, at a minimum, Qwest is obligated to provide these services for at least the next  $3\frac{1}{2}$  years, at the rates set forth in those agreements.

Further still, Qwest noted that it is critical that the survey ask about UNE-P lines in place as of the date at issue, which is December 31, 2004. As Qwest stated, the concern that Qwest has with removing Attachment A, and thus ignoring UNE-P, is that there may be lines shown as UNE-P as of December 2004 which may now have been converted to QPP (or soon will be). If that UNE-P data is ignored, a potentially large piece of the CLEC line base will be ignored, even though those CLEC lines will continue to remain in service for at least three years.

Finally, many of the QPP contracts were entered into in January 2005. Thus, these CLECs will likely be purchasing QPP lines in the near future, but as of today (and as of December 2004), they are (or were) buying UNE-P lines. Even CLECs that entered into QPP contracts in 2004 may not have converted some or all of their UNE-P lines to QPP until they absolutely have to.

In short, Qwest believes that there is necessarily a *transition period* between UNE-P and QPP (which is why the FCC has transition rules in the first place), and such transition was not complete on December 31, 2004, and indeed, the transition is not even complete today (since many CLECs have not yet converted from UNE-P to QPP or another alternative, and have up to a year to do so). Thus, it is necessary to obtain both UNE-P and QPP line information as of December 31, 2004. Of course, there are no concerns about "double-counting" because a CLEC would either have UNE-P *or* QPP (but not both) for any particular line as of December 31, 2004. Qwest believes that if Attachment A is removed, and UNE-P data is ignored, potentially large counts of CLEC lines will be ignored, even though those CLEC lines will continue to remain in service (as QPP) for at least three years.<sup>5</sup> And as stated above, any concerns or objections the parties may have to this question go to the *weight of the evidence*, and the parties are certainly free to advocate against such evidence in testimony. The data, however, should be collected so it is in the record. Even if the CLECs' objections have any validity, the Commission should err on the side of caution by including this question (and any other disputed question) in the survey.

Accordingly, Qwest respectfully requests that Your Honor adopt Qwest's proposed CLEC Survey as presently written, and that question 1 and Attachment A remain in the survey.

#### List of Active CLECs and Draft Bench Request Ruling

Finally, Qwest also encloses herein the list of CLECs to whom the survey should be sent. This list consists of all CLECs in Oregon who are either purchasing wholesale services from Qwest as of December 2004 or are listed in the Local Exchange Routing Guide (LERG) as having a switch and prefixes serving Qwest rate centers in Oregon. Further still, Qwest submits a draft bench request ruling for Your Honor's consideration. It is essentially similar to the bench request ruling that the Commission issued in the UM 1100 TRO proceeding in 2003, with modifications regarding what the Commission will be considering in this telecommunications deregulation proceeding under ORS 759.030. For Your Honor's convenience, we submit the CLEC list and draft bench request ruling, as well as the CLEC Survey itself, on a disk in Word or Excel format so that Your Honor can revise them as you deem appropriate.

<sup>&</sup>lt;sup>5</sup> In addition, any argument that the CLEC survey should not take into consideration UNE-P lines as of December 31, 2004 because these lines will no longer be UNE-P after March 2006 is similar to the argument that the CLECs made in their motion to dismiss this docket on September 13, 2004, which Your Honor denied on October 20, 2004. Again, as Qwest has stated, the CLECs are free to argue about the *weight* that should be given to UNE-P data in their testimony, but that should not be a reason for the survey not to ask this question. Further, although the October 20, 2004 ruling included language about the lack of any weight to be given to UNE-P, such language was subsequently withdrawn on January 20, 2005.

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Thank you for your attention. If you have any questions about this submission, please feel free to call me at your convenience. We look forward to discussing these issues on March 9th.

Very truly yours,

Alex M. Duarte

cc Service List (w/ encls.)

# <u>UX 29 OPUC Bench Request to CLECs</u> Business Retail Switched Services in Owest's Oregon Territory

Except as otherwise indicated, the following questions require access line and other data reports by Oregon Rate Center.<sup>1</sup> If your company tracks retail customer data by prefix, you may access the following NANPA website to view the Oregon rate centers to determine to which rate center each active prefix is assigned: <a href="http://nanpa.com/reports/reports\_cocodes.html">http://nanpa.com/reports/reports\_cocodes.html</a>. At this site, please select the second report on the list, entitled "Central Office Code Utilized Report." For purposes of the reports requested below, please aggregate quantities for each active prefix up to the rate center level, unless specifically requested to report information at a wire center level. <sup>2</sup> These requests apply only to services provided within Qwest's service territory, and all reported in-service quantities should be as of December 31, 2004.

For purposes of the following questions and the associated spreadsheet, references to the sub-columns "analog" and "digital" under the "Basic Business Service (Flat or Measured)" headings should use the following definitions: "analog" means services that deliver an analog signal to the end-user customer; "digital" means services that deliver a digital signal to the end-user customer.

1. Using the matrix provided as Attachment A, please report the quantity of business switched access lines as of 12/31/04, for each service category indicated along the horizontal axis at the top of the report, you serve via <u>UNE-Platform</u> services purchased from Qwest.

Note: subpart (a) below may be answered by a simple "yes" or "no." a. As of the date of your response to #1 above regarding business services based upon UNE-P, do you accept requests from new business customers (other than those customers you currently serve)?

2. Using the matrix provided as Attachment B, please report the quantity of business switched access lines as of 12/31/04, for each service category indicated along the horizontal axis at the top of the report, you serve via the Qwest Platform Plus ("QPP") service purchased from Qwest.

Note: subpart (a) below may be answered by a simple "yes" or "no."

<sup>&</sup>lt;sup>1</sup> Since all CLECs do not track customer data by geography as defined by Qwest wire centers, rate centers have generally been selected as the common basis of data comparison. All active prefixes in Oregon for all telecom providers are associated with specific rate centers. Additionally, data collected at the rate center level can easily be translated for analysis into the "geographic zones" established by the OPUC in its report "The Status of Competition and Regulation in the Telecommunications Industry," released January 2004.

<sup>&</sup>lt;sup>2</sup> There are multiple wire centers within the Portland, Salem and Eugene rate centers. Since Qwest believes that certain wire centers in these areas qualify for "non-impairment" status with respect to high capacity unbundled loops and/or interoffice transport, the data input sheets attached to these instructions request quantities by wire center to assist the Oregon Commission with its analysis.

- a. As of the date of your response to #2 above regarding business services based upon QPP, do you accept requests from new business customers (other than those customers you currently serve)?
- 3. Using the matrix provided as Attachment C, please report the quantity of business switched access lines, for each service category indicated along the horizontal axis at the top of the report, you serve via <u>stand-alone UNE Loop</u> services purchased from Qwest.
- 4. Using the matrix provided as Attachment D1, please report the quantity of business switched access lines, for each service category indicated along the horizontal axis at the top of the report, you serve via <u>loop facilities self-provisioned by CLECs</u>. Same instructions for Attachment D2, but for the business switched access lines provided via <u>loop facilities provided by carriers other than Qwest</u>. Attachments D1 and D2 request that data be reported at the wire center level for rate centers that contain more than one wire center.
- 5. Using the matrix provided as Attachment E (tabs E1, E2, E3, E4) please report the quantity of business switched access lines, for each service category indicated along the horizontal axis at the top of the report, you serve via <u>special access purchased by your company from Qwest</u>. <u>NOTE</u>: there are four tabs in the Excel workbook Attachment E; one for services provided via <u>intrastate DSO-level special access</u> circuits, one for services provided via <u>intrastate DS1 and DS3 special access</u> circuits, one for services provided via <u>interstate DSO-level special access</u> circuits, and the last for services provided via <u>interstate DS1 and DS3 special access</u> circuits. Please complete each workbook tab.
- 6. Please report whether your company currently offers Voice over Internet Protocol ("VoIP") service to business customers in Oregon. If your answer is no, you may ignore the remainder of this question. Using the matrix provided as Attachment F, please separately report the quantity of business telephone numbers in service provided by your company via Voice over Internet Protocol (VoIP) telephony service in Oregon, and state whether your company now offers business VoIP services to business customers in the identified rate centers (the second part of this question should be answered with a "yes or no" for each listed rate center).
- 7. Using the matrix provided as Attachment G (tabs G1, G2, G3), please report the quantity of business customers for each service category indicated along the horizontal axis at the top of the report. Please treat each customer location separately (i.e. a company with one location with 25 lines and another with 2 will be listed twice). Please segment your answer into three customer categories: 1 to 2 lines, 3 to 20 lines, and more than 20 lines, which align with the three tabs of the spreadsheet.
- 8. Using the matrix provided as Attachment H, please report the <u>quantity of lines for each service</u> category indicated along the horizontal axis at the top of the report. Use the following <u>business customer segments</u> to report line counts: 1 to 2 lines, 3 to 20 lines, and more than 20 lines. For this question, aggregate the number of lines provided to a customer, for each applicable service, where the customer has more than one location of

service within Qwest's rate centers. For example, if you provide service to Acme at five different Acme stores, aggregate the total number of lines across the locations and provide the aggregated number in Attachment H for the respective service.

9. Since the OPUC does not require CLECs to publicly file tariffs, price lists, catalogs or other pricing information that other state commissions may require, please produce a copy of all price lists, price schedules, catalogs, tariffs or tariff-like documents (similar to what you file in other states) that show your prices in Oregon for the services listed along the horizontal axis at the top Attachment A.

## **UX 29 CLEC Survey Questions**

Question	n Subject	Excel Attachment	Tabs	Notes
1	UNE-P	Α		
2	Qwest Platform Plus ("QPP")	В		
3	UNE-L	С		
4	CLEC self-provisioned loops	D1		Wirecenter Detail
	CLEC via facilities obtained from others	D2		Wirecenter Detail
5	Special Access	E	E1,E2,E3,E4	
6	VOIP	F		
7	Customer Size by location	G	G1,G2,G3	
8	Aggregate Customer Size	Н		
9	Tariffs, Price Lists	None		

BUSINESS SERVICES						Ē			
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OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
	Analog Digital Total								
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ASHLAND									
ASTORIA									
ATHENA					j j				
BAKER/SUMPTER									
BEND									
BLACK BUTTE									
BLUE RIVER									
CANNON BEACH									
CENTRAL POINT			į						
CLACKAMAS									
CORVALLIS									
COTTAGE GROVE								į	
CULVER									
DALLAS									
EUGENE RIVER ROAD									
EUGENE 10TH AVE									
SPRINGFIELD									
EUGENE TOTAL									
FALLS CITY									
FLORENCE									
GOLD HILL									
GRANTS PASS									
HERMISTON									
JACKSONVILLE									
JEFFERSON				Ž.					
JUNCTION CITY/HARRISBURG			***************************************						
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NEWPORT											
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PENDLETON					,						
PHOENIX											
BURLINGTON											
PORTLAND ALPINE											
PORTLAND ATLANTIC											
PORTLAND BELMONT					-						
PORTLAND BUTLER											
PORTLAND CAPITOL											
PORTLAND CHERRY											
PORTLAND CYPRESS											
PORTLAND HAROLD											
PORTLAND PROSPECT											
PORTLAND TOTAL											
PRINEVILLE											
RAINIER											
REDMOND	:										
ROGUE RIVER											
ROSEBURG											
SALEM MAIN											
SALEM 10TH AVE											
SALEM TOTAL											
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1 1 1 1 1 1 1 1							SDN PRIMARY
							ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*

BUSINESS SERVICES PROVIDED VIA QWEST PLATFORM PLUS	AVAILABILITY OF CLEC BUSINESS SWITCH	LITY OF	CLEC BI	JSINESS	SWITCH	ED BUSIN	ED BUSINESS SERVICES IN OREGON	S IN ORE	GON
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Contact Person/ Telephone Number	Please report below the number of access lines for each listed service of	e number of	access line	s for each lis	sted service c	ategory you pr	ategory you provide via <b>Qwest Platform Plus (QPP)</b> services	latform Plus	(QPP) services
OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
	Analog Digital Total								
ALBANY									
ASHLAND									
ASTORIA									
ATHENA									
BAKER/SUMPTER									
BLACK BUTTE									
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OREGON RATE CENTER	BASIC BUS (FLAT O	SINESS SE	ERVICE RED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	BASIC BUSINESS SERVICE PBX PBX SERVICE/ CENTREX (FLAT OR MEASURED) TRUNKS TRUNKS OUTWATS SERVICES		ISDN BASIC SDN PRIMARY RATE RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
	Analog	Digital	Total								
TOLEDO											
UMATILLA											
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WARRENTON											
WESTPORT											
WOODBURN											

BUSINESS SERVICES PROVIDED VIA STAND- ALONE UNE LOOPS	AVAILAB	ILITY OF	CLEC B	USINESS	SWITCH	ED BUSIN	AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON	ES IN ORE	:GON
Company Name				( <u>D</u> ;	( Data Vintage 12	2/2004)			
Contact Person/ Telephone Number	Please report below the number of access lines for each listed se	below the nu	mber of acc	ess lines for	each listed se	ervice categor	rvice category you provide via stand-alone UNE loops	tand-alone UN	E loops
OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHONOUS TRANSFER MODE (ATM) SERVICE*
ALBANY	Analog Digital Total								
ASHLAND									
ASTORIA									
ATHENA									
BAKER/SUMPTER									
BEND									
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FALLS CITY									
FLORENCE									
GOLD HILL									
GRANTS PASS									
HERMISTON									
JACKSONVILLE									
JEFFERSON									
JUNCTION CITY/HARRISBURG									
KLAMATH FALLS									
LAPINE									
LEABURG									

SI. HELENS	SISTERS	SILEIZ	STA SIDE	SALEM TOTAL	SALEM 10TH AVE	OALEM MAIN	SAI EM MAIN	ROSEBURG	ROGUE RIVER	REDMOND	RAINIER	TRINEVILLE	PURILAND I O I AL	PORTLAND PROSPECT	PORTLAND HAROLD	PORTLAND CYPRESS	PORI LAND CHERRY	PORTLAND CAPITOL	PORILAND BUILER	PORTLAND BELMONT	PORTLAND ATLANTIC	PORTLAND ALPINE	BURLINGTON	PHOENIX	PENDLETON	OAKRIDGE	OAKLAND	NORTH PLAINS	NEWPORT	MILTON-FREEWATER	MEDFORD	MARCOLA	MAPLETON	MADRAS	LOWELL	Analog Digital	BASIC BUSINESS OREGON RATE CENTER SERVICE (FLAT OR MEASURED)
																																				Total	VESS AT OR
																																					ANALOG PBX TRUNKS
																																					DIGITAL PBX TRUNKS
																																					800 SERVICE/ OUTWATS
																																					ANALOG CENTREX SERVICES
																																					ISDN BASIC RATE
																																					ISDN BASIC ISDN PRIMARY RATE RATE
																																					FRAME RELAY*
																																					ASYNCHONOUS TRANSFER MODE (ATM) SERVICE*

WESTPORT	WARRENTON	VENETA	UMATILLA	TOLEDO		OREGO
						OREGON RATE CENTER
					Analog	BASIC SERVII ME
					Digital Total	BASIC BUSINESS SERVICE (FLAT OR MEASURED)
					Total	
						ANALOG PBX TRUNKS
						DIGITAL PBX TRUNKS
						800 SERVICE/ OUTWATS
						ANALOG CENTREX SERVICES
						ISDN BASIC RATE
						SDN BASIC   ISDN PRIMARY RATE RATE
					;	FRAME RELAY*
						ASYNCHONOUS TRANSFER MODE (ATM) SERVICE*

Company Name	PROVIDED VIA LOOP FACILITIES SELF-PROVISIONED			AVA	AVAILABILITY OF CLEC BUSIN	Y OF CL	EC BUS	INESS S	WITCHE	D BUSINE	ESS SWITCHED BUSINESS SERVICES IN OREGON	S IN OREG	ÖN
Person/Telephrone Number/   Pease report below the number of access lines for each listed service cathgory you provide via boop facilities self-providence with listed serviced cathgory you provide via boop facilities self-providence with listed serviced cathgory you provide via boop facilities self-providence with listed serviced services.   Son Basic   Son Basi	Company Name							( <u>Data</u>	Vintage 12/2	004)			
ANALOG   SON BASIC   SON PRIMARY   FRAME   F	Contact Person/ Telephone Number		Pleas	e report below	the number	r of access	lines for ea	ch listed ser	vice categor	you provide	/ia loop facilities	self-provision	ed by the CL
Analog   Digital     ANAD		····	BASIC E	OR MEASUF	RVICE /	NALOG [ PBX RUNKS T	PBX PBX	800 SERVICE/ DUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHROTRANSFER
AND  AND  AND  AND  AND  AND  AND  AND			Analog	Digital	Total								
ANA AND AND AND AND AND AND AND AND AND	ASHLAND												
ASUMPTER BEND SPRING RIVER ROAD SPRING RIVER ROAD ON BEACH ON BEACH CAMAS LAKE OSWEGO MILWAUKIE OREGON CITY CORVALLIS ADAIR COTTAGE GROVE CULP CREEK INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD CITY SPASS	ASTORIA												
REND SPRING RIVER ROAD (BUTTE (BUTTE CAMACH SPRING RIVER ROAD NEEACH ON BEACH ONEGON CITY ALLIS ADAIR COTTAGE GROVE COULP CREEK INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD CITY NCE EUGENE RIVER ROAD SPRINGFIELD TS PASS	ATHENA												
SPRING RIVER ROAD SPRING RIVER ROAD ON BEACH AAL POINT CAMAS ALLIS ADAIR GE GROVE COTTAGE GROVE CULP CREEK CULP CREEK INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD CITY NCE EUGENE RIVER ROAD SPRINGFIELD TS PASS	VSUMPTER	5											
LAKE OSWEGO MILWAUKIE OREGON CITY CORVALLIS ADAIR COTTAGE GROVE CULP CREEK CULP CREEK EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD SPRINGFIELD		_	4 0			-							
LAKE OSWEGO MILWAUKIE OREGON CITY CORVALLIS ADAIR COTTAGE GROVE CULP CREEK DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD		1_											
LAKE OSWEGO MILWAUKIE OREGON CITY CORVALLIS ADAIR COTTAGE GROVE CULP CREEK DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD	BLUE RIVER												
LAKE OSWEGO MILWAUKIE OREGON CITY CORVALLIS ADAIR E COTTAGE GROVE CULP CREEK DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD	CANNON BEACH												
S LAKE OSWEGO MILWAUKIE OREGON CITY CORVALLIS ADAIR ADAIR COTTAGE GROVE CULP CREEK DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD SPRINGFIELD	CENTRAL POINT												
MILWAUKIE OREGON CITY CORVALLIS ADAIR COTTAGE GROVE CULP CREEK DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD SPRINGFIELD			2										
OREGON CITY CORVALLIS ADAIR ADAIR COTTAGE GROVE CULP CREEK DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD SPRINGFIELD	MILWAUKIE		7										
ADAIR ADAIR COTTAGE GROVE CULP CREEK  DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD SPRINGFIELD			8										
ADAIR COTTAGE GROVE CULP CREEK  DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD SS		CRVSOR6	5										
DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD			3 -										
DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD			٥١										
DALLAS INDEPENDENCE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD													
EUGENE 10TH AVE EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD													
EUGENE 10TH AVE EUGENE RIVER ROAD SPRINGFIELD SS													
SPRINGFIELD SPRINGFIELD SS			3										
SPRINGFIELD	EUGENE RIVE	R ROAD	8										
FALLS CITY FLORENCE GOLD HILL GRANTS PASS	SPRINGFIELD		_										
GOLD HILL GRANTS PASS	FALLS CITY												
GOLD HILL GRANTS PASS	FLORENCE												
GRANTS PASS	GOLD HILL												
	GRANTS PASS												

BASIC BUSINESS SERVICE PBX (FLAT OR MEASURED)  Analog Digital Total  Total		1   1   1   1   1   1   1   3   3	ANALOG CENTREX SERVICES	ANALOG CENTREX SERVICES
	ANALOG PBX TRUNKS	ANALOG DIGITAL PBX PBX TRUNKS TRUNKS	ANALOG DIGITAL 800 ANALOG PBX PBX SERVICE/ CENTREX TRUNKS TRUNKS OUTWATS SERVICES	ANALOG DIGITAL 800 ANALOG PBX PBX SERVICE/ CENTREX TRUNKS OUTWATS SERVICES
SERVICE/ CENTREX OUTWATS SERVICES	ANALOG CENTREX SERVICES	SDN BASIC ISDN PRIMARY RATE RATE	ISDN PRIMARY RATE	
SERVICE/ CENTREX OUTWATS SERVICES	ANALOG CENTREX RATE RATE RATE			FRAME RELAY

	UMATILLA	WARTILLA VENETA WARRENTON WESTPORT	OREGON RATE CENTER STANFIELD TOI FDO	WIRECENTER	CIE	BASIC BUSINESS SERVICE (FLAT OR MEASURED)  Analog Digital Total	ESS SERVICE IEASURED) Ital Total	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ANALOG DIGITAL 800 ANALOG PBX PBX SERVICE/ CENTREX RATE RATE	FRAME RELAY*
	MATILLA MATILLA	MATILLA  ENETA  VARRENTON  VESTPORT  MATILLA  MATILLA  MENTILLA  M	OLEDO											
VENETA		WESTPORT	WARRENTON											
WARRENTON	WARRENTON		WESTPORT								İ			

BIICINECO												:	
SERVICES PROVIDED VIA						 	 					) 	
PROVIDED BY				AVA	VLABILI	TY OF C	LEC BU	SINESS S	WITCHE	D BUSINE	AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON	S IN OREC	NOK
CARRIERS OTHER													
THAN QWEST								a.					
		1						( Data	( Data Vintage 12/2004)	2004)			
Company Name			2					11.24.24.25.25.25.25.25.25.25.25.25.25.25.25.25.		- Alichia ia O	at anning topit	in land	allilian assaidad by
Contact Person/ Telephone Number	ımber		Please re	port below t	he number	of access li	nes for eac	n listed servic	d service category you prov	Qwest	west service territ	ory via <u>loop is</u>	Please report below the number of access lines for each listed service category you provide in Cwest service territory via loop lacilities provided by carriers other than Gwest
OREGON RATE CENTER	WIRECENTER	Ë	BASIC B (FLAT	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ERVICE JRED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	BASIC	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
			Analog	Digital	Total								
ALBANY													
ASHLAND													
ASTORIA													
ATHENA													
BAKER/SUMPTER													
BEND		BENDOR24											
BI ACK BITTE		01 104 01											
BLUE RIVER													
CANNON BEACH													
CENTRAL POINT													
CLACKAMAS	LAKE OSWEGO	LKOSOR62											
	MILWAUKIE	MLWKOR17											
	OREGON CITY	ORCYOR18											
CORVALLIS	CORVALLIS	CRVSOR65											
	ADAIR	ADAROR21											
COTTAGE GROVE	COTTAGE GROVE	CTGVOR53											
	CULP CREEK	CLCKOH53											
CULVER	001-00	DI I COBES											
C 144 mg 10	INDEPENDENCE	INDPOR58											
EUGENE	EUGENE 10TH AVE	EUGNOR53											
	à	EUGNOR28											
		SPFDOR01											
FALLS CITY													
FLORENCE													
GOLD HILL													
GRANIS PASS													

SALEM MAIN SALEM MOTH AVE SALEM SEASIDE	SALEM MAIN SALEM 10TH AVE	SALEM MAIN		WINSTON	ROSEBURG	REDMOND	KAINEK	_	PORTLAND CAPITOL PTL	PORTLAND PROSPECTPTLDOR18	PORTLAND CHERRY PTL	L	Ŀ	4	ਨ		PORTLAND HAROLD PTL	(V	┺	DI DI NOTON	PHOENIX	PENDLETON	OAKRIDGE	OAKLAND	NORTH PLAINS	NEWPORT	MILTON-FREEWATER	MEDFORD	NED COLD	ABCOL A	WARM SPRINGS	MADRAS	LOWELL	LEABURG	APINE	KLAMATH FALLS	JUNCTION CITY/HARKISBURG	SETTEROON	TETEDOON	JACKSONVILLE	HERMISTON		OREGON RATE CENTER WIRECENTER	
		SALMOR59	SALMOR58	WNTNOR57	RSBGOR57				PTLDOR69	DOR18	PTLDOR17	PILDOK14		DOB13	PTLDOR12	PTLDOR11	PTLDOR08	PILDOHOZ	BUHLUHOK	ODES!											WRSPOR52	MDRSOR52								-			 CLL	
_																		-										-										$\downarrow$			_	Analog	BASIC BU	
																																										Digital	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	
																																										Total		
																																											ANALOG PBX TRUNKS	
																																											DIGITAL PBX TRUNKS	
																																											800 SERVICE/ OUTWATS	
																																											ANALOG CENTREX SERVICES	
																																											ISDN BASIC RATE	
																																											ISDN BASIC ISDN PRIMARY RATE RATE	
																																											FRAME RELAY*	
																																											ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*	

OREGON RATE CENTER	WIRECENTER	СП	BASIC BU	BASIC BUSINESS SERVICE	1	ANALOG PBX	DIGITAL PBX	800 SERVICE/	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ANALOG DIGITAL 800 ANALOG ISDN BASIC ISDN PRIMARY PBX PBX SERVICE/ CENTREX RATE TRUNKS TRUNKS OUTWATS SERVICES RATE RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
			Analog	Digital	Total								
ST. HELENS													
STANFIELD													
TOLEDO													
UMATILLA													
VENETA													
WARRENTON													
WESTPORT													
WOODBURN													

BUSINESS SERVICES PROVIDED VIA DSO-LEVEL INTRASTATE SPECIAL ACCESS LOOPS		AVA	VILABII	LITY OF	CLEC B	AVAILABILITY OF CLEC BUSINESS SWITCH	SWITCH	ED BUSIN	ED BUSINESS SERVICES IN OREGON	ES IN ORE	GON
Company Name					1	( <u>D</u>	Data Vintage 12/2004)	2/2004)			
Contact Person/ Telephone Number	Please	report be	low the r	number of a	ccess lines	Please report below the number of access lines for each listed service cat	d service cat	egory you pro	egory you provide via DSO-level intrastate Special Access loops	I intrastate Spe	cial Access loops
OREGON RATE CENTER	BASIC SERVIC	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	SS OF	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
	Analog	Digital	Total								
ACHI AND											
ASTORIA											
ATHENA											
BAKER/SUMPTER											
BEND											
BLACK BUTTE											
BLUE RIVER											
CANNON BEACH											
CENTRAL POINT											
CLACKAMAS											
CORVALLIS											
COTTAGE GROVE											
CULVER											
DALLAS											
EUGENE RIVER ROAD											
EUGENE 10TH AVE											
EUGENE TOTAL											
FALLS CITY											
FLORENCE											
GOLD HILL											
GRANTS PASS											
HERMISTON											
JACKSONVILLE											
JEFFERSON											

	BASI	BASIC BUSINESS		ANALOG	DIGITAL	800	ANALOG	ISDN BASIO	ISDNI BRIMARY	EBAME	ASYNCHRONOUS
OREGON RATE CENTER	SERVI ME	SERVICE (FLAT OR MEASURED)		PBX TRUNKS	PBX TRUNKS	S.F.	CENTREX SERVICES	RATE	RATE	FHAME RELAY*	TRANSFER MODE (ATM) SERVICE*
	Analog	Digital	Total								
JUNCTION CITY/HARRISBURG											
KLAMATH FALLS											
LAPINE											
LEABURG											
LOWELL											
MADRAS											
MAPLETON											
MARCOLA											
MEDFORD											
MILTON-FREEWATER											
NEWPORT											
NORTH PLAINS											
OAKLAND											
OAKRIDGE											
PENDLETON											
PHOENIX											
BURLINGTON											
PORTLAND ALPINE											
PORTLAND ATLANTIC											
PORTLAND BELMONT											
PORTLAND BUTLER											
PORTLAND CAPITOL											
PORTLAND CHERRY											
PORTLAND CYPRESS											
PORTLAND HAROLD											
PORTLAND PROSPECT											
PORTLAND TOTAL											
PRINEVILLE											
RAINIER											
REDMOND											
ROGUE RIVER											
ROSEBURG											
SALEM MAIN											
SALEM 10TH AVE											
SALEM TOTAL											
מראטוטר			L								

BUSINESS SERVICES PROVIDED VIA DS1 and DS3- LEVEL INTRASTATE SPECIAL ACCESS LOOPS		AVA	ILABIL	ЛТҮ ОР	CLEC B	USINESS	SWITCH	ED BUSIN	AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON	ES IN ORE	EGON
Company Name							(Data Vintage 12/2004)	2/2004)			
Contact Person/ Telephone Number	Please rep	ort below	the numb	er of acces	ss lines for e	each listed se	rvice catego	Please report below the number of access lines for each listed service category you provide via		evel intrastate	DS1 and DS3-level intrastate Special Access loops
OREGON RATE CENTER	BASIC SERVIK ME	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	) RO	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE		FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
	Analog	Digital	Total								
ALBANY	_										
ASHLAND											
ASTORIA											
ATHENA											
BAKER/SUMPTER											
BEND											
BLACK BUTTE											
BLUE RIVER											
CANNON BEACH											
CEN   RAL POINT											
CLACKAMAS											
COTTAGE GROVE											
CULVER											
DALLAS											
EUGENE RIVER ROAD											
EUGENE 10TH AVE											
OTA NOTAL											
ENGENE IOIAL											
FI CAFNOF											
GOLD HILL											
GRANTS PASS											
HERMISTON											
JACKSONVILLE											
JEFFERSON											
JUNCTION CITY/HARRISBURG											
KLAMATH FALLS											
LAPINE											
LEABURG											
LOVVELL		L									

TRUNKS OUTWATS S												
REWATER  EEWATER  N  N  N  N  N  N  N  N  N  N  N  N  N	OREGON RATE CENTER	SERVI ME	CE (FL/ ASURE	TOR (TOR	ANALOG PBX TRUNKS		SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
EEWATER  EEWATER  AINS  ITON  N  ATON  N  ATON  ITON  N  ATON  N  ATON  N  ATON  N  BELMONT  N  D  CHERRY  CHERRY  CHERRY  CHERRY  CHERRY  CHERRY  CHERRY  CHERRY  CHERRY			Digital									
MARCEJON MEDFORD MILTON-FREEWATER MILTON	MADRAS											
MEDFORD MEDFORD MICTON FREEWATER NORTH PLANS PORTLAND ALPINE PORTLAND ALPINE PORTLAND BLANTIC PORTLAND BLANTIC PORTLAND BLANTIC PORTLAND BLANTIC PORTLAND HARDLD PORTLAND HARDLD PORTLAND HARDLD PORTLAND HARDLD PORTLAND HARDLS P	MAPLETON											
MILTON-FREEWATER MILTON-FREEWATER MILTON-FREEWATER MILTON-FREEWATER MILTON-FREEWATER MILTON-FREEWATER MOARINDER DARKINGE FENCLETON BURLETON BURLETON PORTLAND ALPINE PORTLAND ALPINE PORTLAND ALPINE PORTLAND BUTLER PORTLAND CHERRY PORTLAND HAROLD PORTLAND HAROLD PORTLAND HAROLD PORTLAND HAROLD PORTLAND HAROLD PORTLAND TOTAL FREEDING FRE	MARCOLA											
NEWPORT NORTH PLANS NORTH PLANS NORTH PLANS NORTH PLANS OAKLAND OAKLAN	MEDFORD											
NORTH PLAINS OAKLAND OAKLAND OAKLAND OAKHOGE PENULETON PENULUSTON PORTLAND ATLANTIC PORTLAND ATLANTIC PORTLAND BUTLER PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND PROSPECT PORTLAND PROSPECT PORTLAND TOTAL FRIEIGULE REIEGULE REIEGULE SALEM MAIN SALEM TOTAL SALEM TOTAL SALEM TOTAL SEASIDE STATIFELD UNAFILLAN WEISTFONT WEIS	MILTON-FREEWATER											
MORTH PLAINS  OAKRIDGE  PARTICAND  PRICIETON  BURLINGTON  PORTLAND ATLANTIC  PORTLAND BELMONT  PORTLAND BELMONT  PORTLAND CAPPROL  PORTLAND CAPPROL  PORTLAND TOTAL  PORTLAND TOTAL  FRIEDUILE  SALEM 10TH AVE   NEWPORT												
OAKLAND OAKLAND OAKLAND OAKLAND PROTICAN BURLINGTON PORTLAND ALPINIE PORTLAND ATLANTIC PORTLAND BUTLER PORTLAND CHERRY PORTLAND CHERRY PORTLAND BUTLER PORTLAND TOTAL PRITEVILLE REIEVILLE REIEVILLE REIEVILLE REIEVILLE SALEM MAIN SALEM MAIN SALEM TOTAL SEASIDE ST. FELENS ST. F	NORTH PLAINS											
DAKRIDGE PENDLETON PORTLAND ALPINE PORTLAND ALPINE PORTLAND ATLANTIC PORTLAND DELMONT PORTLAND DELMONT PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND PROSPECT SALEM MAIN SALEM MOTH AVE SALEM MOTH AVE SALEM TOTAL SERSIBURG STEINEURG STEINEURG STEINEURG STEINEURG STEINEURG STEINEURG STEINEURG WAFFIELD TOLED WAFFIELD WAF	OAKLAND											
PENCLETON PENTLAND ALPINE PORTLAND BELMONT PORTLAND BELMONT PORTLAND BELMONT PORTLAND BELMONT PORTLAND BELMONT PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND CHERRY PORTLAND TOTAL FRICIOND FOR LAND TOTAL FRICIOND SALEM MAIN SALEM MAIN SALEM MOTAL SEAJDE STATELEUS STATELEUS STATELEUS STATELEUS STATELEUS STATELEUS WAFRENTON WAFRENTON WAFRENTON WAFRENTON	OAKRIDGE								•			
BURLINGTON	PENDLETON											
BURLINGTON   PORTLAND ALPINE   PORTLAND ALPINE   PORTLAND ALPINE   PORTLAND ALPINE   PORTLAND ALPINE   PORTLAND BUTLER   PORTLAND BUTLER   PORTLAND CAPITOL   PORTLAND CAPITOL   PORTLAND CAPITOL   PORTLAND CAPITOL   PORTLAND PO	PHOENIX											
PORTLAND BELMONT PORTLAND BELMONT PORTLAND BUTLER PORTLAND CAPITOL PORTLAND CAPITOL PORTLAND CAPITOL PORTLAND CAPITOL PORTLAND TOTAL PORTLAND TOTAL FRILEVILLE REILEVILLE RAIDER ROSEBURG SALEM MANN SALEM MOTAL SALEM MOTAL SERSIDE SILETIZ SILTERS S	BURLINGTON											
PORTLAND BUTLER PORTLAND BUTLER PORTLAND BUTLER PORTLAND CAPITOL PORTLAND CAPITOL PORTLAND CAPERS PORTLAND CAP	PORTLAND ALPINE											
PORTLAND BELMONT PORTLAND BELMONT PORTLAND CAPITOL PORTLAND CAPITOL PORTLAND CAPRESS PORTLAND CAPRESS PORTLAND PROSPECT PORTLAND PROSPECT PORTLAND PROSPECT PORTLAND PROSPECT PRINEVILLE REDIXOND REDIXON	PORTLAND ATLANTIC											
PORTLAND BUTLER PORTLAND CAPITOL PORTLAND CHERRY PORTLAND CHERRY PORTLAND TOTAL PORTLAND PROSPECT PORTLAND TOTAL REDIJOND ROSHE RIVER REDIJOND SALEM MAIN SALEM MOTH AVE SALEM TOTAL SEASIDE SILFTZ SISTERS ST. IFELENS ST. IFELNS ST. IFENS	PORTLAND BELMONT											
PORTLAND CHERRY PORTLAND COMERNY PORTLAND COMERNY PORTLAND COMERNS PORTLAND COMERNY PORTLAND TOTAL PORTLAND TOTAL PROSEDURG REDITION RECEIVER RECEIVER RESIDE SALEM TOTAL SEASUBE SILFIELENS SITAFIELD TOLEDO UMAFRENTON WESTPORT WE	PORTLAND BUTLER											
PORTLAND CYPRESS PORTLA	PORTLAND CAPITOL											
PORTLAND CYPRESS   PORTLAND PROSPECT   PORTL	PORTLAND CHERRY											
PORTLAND HAROLD   PORTLAND PROSPECT   PORTLAND PROSPECT   PORTLAND PROSPECT   PORTLAND TOTAL   PORTLAND TO	PORTLAND CYPRESS											
PORTLAND PROSPECT   PORTLAND PROSPECT   PORTLAND TOTAL   PORTLAND TOTAL   PORTLAND PROSPECT   PORTLAND P	PORTLAND HAROLD											
POE TLAND TOTAL	PORTLAND PROSPECT											
PRINEVILLE	POFTLAND TOTAL											
RACIJIER   RECILOND	PRIMEVILLE											
REDIJOND   ROGUE RIVER   ROG	RAITHER											
ROGUE RIVER   ROSEBURG   ROSEBU	REDLIOND											
ROSEBURG	ROGUE RIVER											
SALEM MAIN         SALEM 10TH AVE         SALEM 10TH	ROSEBURG											
SALEM TOTAL         SALEM TOTAL           SEASIDE         SEASIDE           SILETZ         SISTERS           SI. FELENS         SISTERS           ST. FELENS         SISTERS           STASIFIELD         SISTERS           MAFFIELD         SISTERS           VENETA         SISTERS           SISTERS	SALEM MAIN											
SALEM TOTAL       SALEM TOTAL         SEASIDE       SEASIDE         SILETZ       SISTERS         ST. HELENS       STANFIELD         TOLEDO       STANFIELD         UMÁTILLA       STANFIELD         VENETA       STANFIELD         VENETON       STANFIELD         VENETON       STANFIELD         VENETON       STANFIELD         VENETON       STANFIELD         VENETON       STANFIELD         VENETON       STANFIELD         STANFIELD       STANFIELD	SALEM 10TH AVE											
SEASIDE	SALEM TOTAL											
SILETZ   SISTERS   SISTE	SEASIDE											
SISTERS   SIST	SILETZ					-						
ST.	SISTERS											
STA::FIELD	ST. HELENS											
TOLEDO	STARIELD											
WESTPORT WOODBÜRN	TOLEDO											
WARRENTON WESTPORT WOODBÜRN	UMATILLA											
WASSITON WESTPORT WOODBURN	VENETA											
WESTPORT	WARRENTON											
WOCCECTIV	WEG TORI			ľ	;							
	WOODBORN											

BUSINESS SERVICES PROVIDED VIA DSO -LEVEL INTERSTATE SPECIAL ACCESS LOOPS		AV	AILABILI	TY OF C	STEC BUS	SINESS	WITCHED	USINESS	SERVICES	SERVICES IN OREGON
Company Name						(Data	(Data Vintage 12/2004)	04)		
Contact Person/ Telephone Number		Please r	eport below	the numbe	er of access li	ines for each	n listed service Access loops	category you prov	ide via DSO le	report below the number of access lines for each listed service category you provide via DSO level interstate Special  Access loops
OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	SINESS =LAT OR RED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	· ·	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
	Analog Digital	al Total								
ALBANY		П								
ASHLAND										
ATHENA										
BAKER/SUMPTER										
BEND										
BLACK BUTTE										
BLUE RIVER										
CANNON BEACH										
CENTRAL POINT										
CLACKAMAS										
CORVALLIS										
COTTAGE GROVE										
CULVER										
DALLAS										
EUGENE RIVER ROAD										
EUGENE 101H AVE										
SPRINGFIELD										
FALLS CITY										
FLORENCE										
GOLD HILL										
GRANTS PASS										
HERMISTON										
JACKSONVILLE										
JEFFERSON										
JUNCTION CITY/HARRISBURG										
KLAMATH FALLS										
LAPINE										
LEABURG										
LOWELL										
MARIETON		+								
MARCOI A										
MEDFORD										

WOODBURN	WESTPORT	WARRENTON	VENETA	UMATILLA	TOLEDO	STANFIELD	ST. HELENS	SISTERS	SILETZ	SEASIDE	SALEM TOTAL	SALEN	SALEN	ROSEBURG	ROGUE RIVER	REDMOND	RAINIER	PRINEVILLE	PORTLA	PORT	PORT	PORTI	PORTI	PORT	PORTI	PORT	PORTI	PORTI	BURLI	PHOENIX	PENDLETON	OAKRIDGE	OAKLAND	NORTH PLAINS	NEWPORT	MILTON-		On
URN	DRT	NTON		A	)	ELD	ENS				TOTAL	M 10TH AVE	SALEM MAIN	JRG	RIVER	5		LLE	PORTLAND TOTAL	PORTLAND PROSPECT	PORTLAND HAROLD	PORTLAND CYPRESS	PORTLAND CHERRY	PORTLAND CAPITOL	PORTLAND BUTLER	PORTLAND BELMONT	PORTLAND ATLANTIC	PORTLAND ALPINE	BURLINGTON	×	TON	GE	D	PLAINS	RT	MILTON-FREEWATER		OREGON RATE CENTER
								l							_																						Analog	BAS SER\
																																					Digital	BASIC BUSINESS SERVICE (FLAT OR MEASURED)
																																					Total	
							:																															ANALOG PBX TRUNKS
																																						DIGITAL PBX TRUNKS
																																						800 SERVICE/ OUTWATS
																																						ANALOG CENTREX SERVICES
																																						ISDN BASIC RATE
																																						ISDN BASIC   ISDN PRIMARY RATE RATE
																																						FRAME RELAY*
																																						ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*

BUSINESS SERVICES LEVEL INTERSTATE SPECIAL ACCESS LOOPS	ъ	VAILABI	ППТУ ОБ	CLECE	3USINES:	S SWITCI	HED BUSII	AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVIO	CES IN OREGON	EGON
Company Name						Data Vintage 12/2004)	12/2004)			
Contact Person/ Telephone Number	Please report	below the n	umber of ac	cess lines	or each liste	d service cat loops	tegory you pro	Please report below the number of access lines for each listed service category you provide via DS1 and loops	DS3-level inter	DS3-level interstate Special Access
OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	SINESS =LAT OR RED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/	SERVICES CENTREX CENTREX	ISDN BASIC RATE	YBAMIBA NOSI	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
i i i i i i i i i i i i i i i i i i i	Analog Digital	ป Total								
ALBANY										
ASTORIA										
ATHENA										
BAKER/SUMPTER										
BLACK BUTTE										
BLUE RIVER										
CANNON BEACH										
CENTRAL FOINT										
CORVALLIS		1								
COTTAGE GROVE										
CULVER										
DALLAS										
EUGENE RIVER ROAD										
SPRINGFIELD										
EUGENE TOTAL										
FALLS CITY										
FLORENCE		-								
GRANTS PASS										
HERMISTON										
JACKSONVILLE										
JEFFERSON										
JUNCTION CITY/HARRISBURG										
KLAMATH FALLS										
LAPINE										
DWEI -										
MADRAS										
MAPLETON										
MARCOLA										
		-								

			4								
OREGON RATE CENTER	SERVII ME	BASIC BUSINESS SERVICE (FLAT OR MEASURED)		ANALOG PBX TRUNKS	PBX TRUNKS	SERVICE/ CENTREX OUTWATS SERVICES	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN BASIC ISDN PRIMARY RATE RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
	Analog Digital	Digital	Total								
MILTON-FREEWATER		_									
NEWPORT											
NORTH PLAINS											
OAKLAND											
OAKRIDGE											
PENDLETON											
PHOENIX											
BURLINGTON											
PORTLAND ALPINE											
PORTLAND ATLANTIC											
PORTLAND BELMONT											
PORTLAND BUTLER											
PORTLAND CAPITOL											
PORTLAND CHERRY											
PORTLAND CYPRESS											
PORTLAND HAROLD											
PORTLAND PROSPECT											
PORTLAND TOTAL											
PRINEVILLE											
RAINIER											
REDMOND											
ROGUE RIVER	_										
ROSEBURG											
SALEM MAIN											
SALEM 10TH AVE											
SALEM TOTAL											
SEASIDE											
SILETZ											
SISTERS											
ST. HELENS											
STANFIELD											
TOLEDO											
UMATILLA											
VENETA											
WARRENTON											
WESTPORT											

BUSINESS SERVICES PROVIDED VIA VOICE OVER		
INTERNET TELEPHONY	AVAILABILITY O	AVAILABILITY OF COMPETITIVE BUSINESS SERVICES IN OREGON (Data Vintage 12/2004)
Company Name		Data virtage 12/2004)
Contact Person/ Telephone Number	IF NOT PREVIOUSLY REPORTED ON THIS SURVEY, please separately provide via Voice over Internet Protocol (VoIP) telephony service in Oregor VoIP services to business customers in t	IF NOT PREVIOUSLY REPORTED ON THIS SURVEY, please separately report below in-service quantities of business services you provide via Voice over Internet Protocol (VoIP) telephony service in Oregon and whether your company now makes available business VoIP services to business customers in the identified rate centers.
OREGON RATE CENTER	Business VoIP Telephone Numbers in Service	Business VoIP Available? (Yes/No)
ALBANY		
ASHLAND		
ASTORIA		
ATHENA		
BEND BEND		
BI ACK BUTTE		
BLUE RIVER		
CANNON BEACH		
CENTRAL POINT		
CLACKAMAS		
CORVALLIS		
COTTAGE GROVE		
CULVER		
DALLAS		
EUGENE RIVER ROAD		
EUGENE 10TH AVE		
SPRINGFIELD  FUGENE TOTAL		
FALLS CITY		
FLORENCE		
GOLD HILL		
GRANTS PASS		
HERMISTON		
JACKSONVILLE		
OFFI ENGOIN		

		CILLIA
		SII ET7
		SEVOIDE STATES
		SALEM TOTAL
		SALEM 10TH AVE
		SALEM MAIN
		ROSEBURG
		ROGUE RIVER
		REDMOND
		RAINIER
		PRINEVILLE
		PORTLAND TOTAL
		PORTLAND PROSPECT
		PORTLAND HAROLD
		PORTLAND CYPRESS
		PORTLAND CHERRY
		PORTLAND CAPITOL
		PORTLAND BUTLER
		PORTLAND BELMONT
		PORTLAND ATLANTIC
		PORTLAND ALPINE
		BURLINGTON
		PHOENIX
		PENDLETON
		OAKRIDGE
		OAKLAND
		NORTH PLAINS
		NEWPORT
		MILTON-FREEWATER
		MEDFORD
		MARCOLA
		MAPLETON
		MADRAS
		LOWELL
		LEABURG
		LAPINE
		KLAMATH FALLS
		JUNCTION CITY/HARRISBURG
Business VoIP Available? (Yes/No)	Business VoIP Telephone Numbers in Service	OREGON RATE CENTER

OREGON RATE CENTER	Business VoIP Telephone Numbers in Service	Business VoIP Available? (Yes/No)
SISTERS		
ST. HELENS		
STANFIELD		
TOLEDO		
UMATILLA		
VENETA		
WARRENTON		
WESTPORT		
WOODBURN		

BUSINESS CUSTOMERS		NUMBE	R OF CL	EC SMAL	L BUSINI	NUMBER OF CLEC SMALL BUSINESS CUSTOMERS IN		OREGON	
				6	(Data Vintage 12/2004)	12/2004)			
Company Name									
Contact Person/ Telephone Number		Ple	ase report b	elow the busi	ness custon	ners for each lis	Please report below the business customers for each listed service category	ory	
OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE
	Analog Digital Total								
ALBANY									
ASHLAND									
ALBANY									
ASHLAND								-	
ASTORIA									
BAKER/SUMPTER									
BEND									
BLACK BUTTE									
BLUE RIVER									
CANNON BEACH									
CENTRAL POINT									
O LA CALMAG									
COTTAGE GROVE		Ì							
CULVER									
DALLAS									
EUGENE RIVER ROAD									
EUGENE 10TH AVE									
SPRINGFIELD									
EUGENE TOTAL									
FALLS CITY									
FLORENCE									
GOLD HILL									
GRANTS PASS									
HERMISTON									
JACKSONVILLE									
JEFFERSON								4	
JUNCTION CITY/HARRISBURG									
KLAMATH FALLS									
LAPINE									
LEABURG									
LOWELL									
MADRAS									
MAPLETON									
MARCOLA									
MEDFORD									

WC DBURN	 WAI RENTON	VENITA	UMATILLA	TOLEDO	STA:,FIELD	ST. HELENS	SISTERS	SILE: Z	SEASIDE	SALEM TOTAL	SALEM 10TH AVE	SALEM MAIN	ROS BURG	ROGUE RIVER	RECITIOND	RAILIER	PRIMEVILLE	POR LAND TOTAL	PORTLAND PROSPECT	PORTLAND HAROLD	PORTLAND CYPRESS	PORTLAND CHERRY	PORTLAND CAPITOL	PORTLAND BUTLER	PORTLAND BELMONT	PORTLAND ATLANTIC	PORTLAND ALPINE	BURLINGTON	PHOENIX	PENDLETON	OAKRIDGE	OAKLAND	NORTH PLAINS	NEWPORT	MILTON-FREEWATER		OREGON PATE CENTER
L		_	_	L																					-											Analog D	BASIC BUSINESS SERVICE (FLAT OR MEASURED)
L	_	_												L	_	_																				Digital	BASIC BUSINESS SERVICE (FLAT OF MEASURED)
			L												_				L													_				Total	
																																					ANALOG PBX TRUNKS
																											ļ										DIGITAL PBX TRUNKS
																																					800 SERVICE/ OUTWATS
																																					ANALOG CENTREX SERVICES
																																					ISDN BASIC RATE
																																					ISDN PRIMARY RATE
																																					FRAME RELAY
																																					ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE

BUSINESS CUSTOMERS WITH 3 TO 20 LINES	Z	UMBER O	)F CLEC	"MEDIU	M" BUSII	NESS CUS	NUMBER OF CLEC "MEDIUM" BUSINESS CUSTOMERS IN OREGON	OREGON	
				(C)	(Data Vintage 12/2004)	12/2004)			
Company Name									
Contact Person/ Telephone Number		Pleas	e report be	low the busi	ness custom	Please report below the business customers for each listed sen	sted service category	y	
OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE
	Analog Digital Total								
ALBANY									
ASHLAND									
ASTORIA									
ATHENA									
BAKER/SUMPTER									
BEND									
BLACK BUTTE									
BLUE RIVER									
CANNON BEACH									
CENTRAL POINT									
CLACKAMAS									
CORVALLIS									
COTTAGE GROVE									
CULVER									
DALLAS									
EUGENE RIVER ROAD									
EUGENE 10TH AVE									
SPRINGFIELD									
EUGENE TOTAL									
FALLS CITY									
FLORENCE									
GOLD HILL									
GRANTS PASS									
HERMISTON									
JACKSONVILLE									
JEFFERSON									
JUNCTION CITY/HARRISBURG									
KLAMATH FALLS									
LAPINE								ļ	
LEABURG									
LOWELL									
MADRAS									
MAPLETON						;			
MARCOLA									
MEDFORD									
ANI TON EDEEMATED									_

WARRENTON WESTPORT	RENTON	VENETA	UMATILLA	IOLEDO	STANFIELD	ST. HELENS	SISTERS	SILETZ	SEASIDE	SAI EM TOTAI	SALEM 10TH AVE	SALEM MAIN	ROSEBURG	ROGUE RIVER	REDMOND	RAINIER	TAINEVILLE	TORILAND IOIAL	H AND TOTAL	BORTI AND BROSPECT	PORTI AND HAROLD	PORTLAND CYPRESS	PORTLAND CHERRY	PORTLAND CAPITOL	PORTLAND BUTLER	PORTLAND BELMONT	PORTLAND ATLANTIC	PORTLAND ALPINE	BURLINGTON	PHOENIX	PENDLETON	OAKRIDGE	OAKLAND	NORTH PLAINS	NEWPORT	Analog Digital Total	1	OREGON RATE CENTER SERVICE (FLAT OR PBX MEASURED) TRUNKS
																																						G DIGITAL PBX
																																						800 SERVICE/ OUTWATS
																																						ANALOG CENTREX SERVICES
					:																																	ISDN BASIC ISDN PI
																																						ISDN PRIMARY RATE
																																						FRAME RELAY
																																						ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE

BUSINESS CUSTOMERS			Z	JMBER	OF CLE	C 'LARGE	" BUSINE	NUMBER OF CLEC 'LARGE" BUSINESS CUSTOME	OMERS IN OREGON	REGON	
						(D)	(Data Vintage 12/2004)	2/2004)		:	
Company Name											
Contact Person/ Telephone Number				Plea	se report be	elow the busin	less custome	Please report below the business customers for each listed ser	ed service category	<b>Y</b>	
OREGON RATE CENTER	BASI SERVI	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	OR	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWATS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE
	Analog	Digital	Total								
ALBANY	-										
ASHLAND											
ASTORIA											
ATHENA											
BAKER/SUMPTER											
BEND											
BLACK BUTTE											
DANNION BEACH											
CENTRAL POINT											
CLACKAMAS											
CORVALLIS											
COTTAGE GROVE											
CULVER											
DALLAS											
EUGENE RIVER ROAD											
EUGENE 10TH AVE			:								
SPRINGFIELD											
FALLS CITY											
FLORENCE											
GOLD HILL											
GRANTS PASS											
HERMISTON											
JACKSONVILLE											
JEFFERSON											
JUNCTION CITY/HARRISBURG											
KLAMATH FALLS											
LAPINE											
LEABURG											
LOWELL											
MADRAS											
MAPLETON											
MARCOLA											
MEDFORD											

OREGON RATE CENTER	BAS SERV	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ESS TOA	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE
	Analog	Digital	Total								
MILTON-FREEWATER											
NEWPORT											
NORTH PLAINS											
OAKLAND											
OAKRIDGE											
PENDLETON							į				
PHOENIX											
BURLINGTON											
PORTLAND ALPINE											
PORTLAND ATLANTIC											
PORTLAND BELMONT											
PORTLAND BUTLER											
PORTLAND CAPITOL											
PORTLAND CYBERRY											
PORTI AND HAROLD											
PORTLAND PROSPECT											
PORTLAND TOTAL											
PRINEVILLE											
RAINIER											
REDMOND											
ROGUE RIVER											
ROSEBURG											
SALEM MAIN											
SALEM 10TH AVE											
ORIGIN I CLAR											
SII ET7											
SISTERS											
ST. HELENS											
STANFIELD											
TOLEDO											
UMATILLA											
VENETA											
WARRENTON											
WESTPORT											
WOODBURN											

		NUMBER O	NUMBER OF CLEC LINES IN QWEST'S SERVING AREA	OWES:	T'S SER	VING AR	EA IN OR	EGON BY	IN OREGON BY CUSTOMER SIZE	SIZE	
					(Data Vinta	(Data Vintage 12/2004)					
Company Name				ļ							Andrew Control
Contact Person/ Telephone Number			Please report below the business customers for each	below the b	usiness cus	tomers for e	ach listed se	listed service category			
	BASIC BUSINESS   BUSINESS   BASIC BUSINE	BASIC BUSINESS   BASIC BUSINESS   BASIC BUSINESS SERVICE (FLAT OR SERVICE (FLAT OR SERVICE (FLAT OF	BASIC BUSINESS SERVICE (FLAT OR	ANALOG	DIGITAL	800	ANALOG	ISDN BASIC	ISDN PRIMARY	FRAME	ASYNCHRONOUS
CUSTOMERSIZE	MEASURED) ANALOG	MEASURED) <b>DIGITAL</b>	MEASURED) T <b>OTAL</b>	TRUNKS	TRUNKS	OUTWATS	SERVICES	RATE	TRUNKS TRUNKS OUTWATS SERVICES RATE RATE	RELAY	(ATM) SERVICE
1 TO 2 LINES											
3 TO 20 LINES					İ						
OF MORE LINES											

## **CLEC list for UX 29 Survey**

1-800-Reconex Inc. dba USTel
ACN Communications Services
Inc.
American Fiber Networks Inc.
Apex Telecom Inc.
AT&T Communications of the
Pacific Northwest, Inc.
AT&T Local Service (ALS)
(fka Teleport Communications
Group, Inc, TCG)
ATL Communications dba
Sunriver Telecom
Automotive Experts Group Inc.
dba Bend Data Center
Beaver Creek Cooperative
Telephone Company
BG Enterprises Inc.
Budget Phone Inc.
Bullseye Telecom Inc.
Centel Communications Inc.
City of Portland Oregon
Comcast Phone of Oregon LLC
(f/k/a AT&T Broadband Phone
of Oregon LLC)
Comm South Companies Inc.
Covad Communications
Company
Cypress Communications
Cypress Communications
Cypress Communications Operating Company Inc.
Cypress Communications
Cypress Communications Operating Company Inc. DSLnet Communications LLC
Cypress Communications Operating Company Inc. DSLnet Communications LLC Eastern Oregon Telecom
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C.
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc.
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc.
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc.
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc. Eschelon Telecom of Oregon
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc. Eschelon Telecom of Oregon Inc. (formerly Eschelon
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc. Eschelon Telecom of Oregon Inc. (formerly Eschelon Telecom of Washington Inc.)
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc. Eschelon Telecom of Oregon Inc. (formerly Eschelon Telecom of Washington Inc.) (formerly American Telephone
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc. Eschelon Telecom of Oregon Inc. (formerly Eschelon Telecom of Washington Inc.) (formerly American Telephone Technology Inc.)
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc. Eschelon Telecom of Oregon Inc. (formerly Eschelon Telecom of Washington Inc.) (formerly American Telephone Technology Inc.) Excel Telecommunications Inc.
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc. Eschelon Telecom of Oregon Inc. (formerly Eschelon Telecom of Washington Inc.) (formerly American Telephone Technology Inc.)
Cypress Communications Operating Company Inc. DSLnet Communications LLC  Eastern Oregon Telecom L.L.C. Electric Lightwave, Inc. Ernest Communications Inc. dba ECI Communications, Inc. Eschelon Telecom of Oregon Inc. (formerly Eschelon Telecom of Washington Inc.) (formerly American Telephone Technology Inc.) Excel Telecommunications Inc. Gervais Telephone Company

Global Crossing Local Services	
Inc. (formerly known as	
Frontier Local Services Inc.)	
ICG Telecom Group Inc.	
Integra Telecom of Oregon Inc.	
KMC Telecom V Inc.	
Level 3 Communications LLC	
Lightyear Network Solutions	
LLC	
MCI WORLDCOM	
Communications Inc.	
MCImetro Access	
Transmission Services LLC	
McLeodUSA	
Telecommunications Services	
Inc.	
New Access Communications	
LLC	
New Edge Network Inc. dba	
New Edge Networks	
NextGen Phone Systems Inc.	
North County Communications	
Northwest Open Access	
Network Oregon (aka Noanet	
Oregon)	_
NOS Communications Inc.	_
OneEighty Networks Inc.	
(Assigned from HighSpeed	
Communications.)	
Oregon Telecom Inc.	
Pac-West Telecomm Inc.	_
Preferred Carrier Services Inc.	
Preferred Long Distance Inc.	_
Prime Time Ventures LLC	_
PriorityOne	
Telecommunications Inc.	_
Quality Telephone Inc.	_
Quantum Communications	
Regal Diversified Inc. (dba	
Regal Telephone Company)	_
Rio Communications, Inc.	
SBC Telecom Inc.	
SCS Communications Oregon	
Sprint Communications	
Company L.P.	
Talk America Inc.	
Tel West Communications	_

LLC
Telephone Restoration Network
dba Telnet
Time Warner Telecom of
Oregon LLC
United Communications, Inc.
dba Unicom
Universal Telecommunications
Inc.
VarTec Telecom Inc.
VCI (Vilaire aka Stan
Efferding)
Wantel Telecommunications
Western Independent Networks
Inc.
Western Telephone Integrated
Communications Inc. (f/k/a
CDS Internet Inc.)
XO Oregon Inc.
Trinsic (formally Z-Tel)

# BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UX 29

In the Matter of the Petition of Qwest Corporation to Exempt from Regulation Qwest's Switched Business Services

#### **RULING**

# COMMISSION REQUESTS FOR PRODUCTION OF INFORMATION

On June 21, 2004, Qwest Corporation ("Qwest") filed with the Public Utility Commission of Oregon ("Commission") a petition to exempt from regulation Qwest's switched business services pursuant to ORS 759.030(2) through (4) and OAR 860-032-0025. Qwest's petition seeks such exemption of regulation (or deregulation) for all terms, conditions and rates for certain of Qwest's switched business telecommunications services ("switched business services"), throughout Qwest's ILEC service territory in the state of Oregon. Qwest alleges that its switched business services in Oregon are subject to competition from alternative providers, and that such alternative providers provide functionally equivalent or substitutable services at comparable rates, terms and conditions. In addition, Qwest alleges there are no economic or regulatory barriers, and that the public interest no longer requires full regulation of Qwest's switched business services.

The applicable law for a petition for exemption from regulation is ORS 759.030 and OAR 860-032-0025. Pursuant to ORS 759.030(3) and OAR 860-032-0025(1), the Commission shall, upon the petition of a telecommunications utility, exempt from regulation a telecommunications

<sup>&</sup>lt;sup>1</sup> The switched business services for which Qwest requests exemption from regulation fall into three categories. The first category consists of those services that provide access to the network, such as flat-rated and measured lines, private branch exchange (PBX) trunks and Centrex services, including feature packages. The second category consists of discretionary business features which are software enhancements available as access line or trunk options. The third category consists of Frame Relay and Asynchronous Transfer Mode (ATM) services (packet-switched services in Qwest's Advanced Communications Services Tariff). Specifically, Qwest proposes to exempt its switched business telecommunications services, as described in its Exchange and Network Services Tariff, PUC Oregon No. 29, sections 5, 7, 9, 10, 14, 15, 105, 107, 109 and 115, Qwest's Exchange and

utility's services if price and service competition exists. Further, pursuant to ORS 759.030(2) and OAR 860-032-0025(2), upon a petition from any interested party or person, including a telecommunications utility, the Commission may exempt from regulation Qwest's services if one of the three following conditions are met: (1) price and service competition exist; (2) the service is subject to competition; or (3) the public interest no longer requires full regulation of the service.

Under either of the two approaches described above, ORS 759.030(4) and OAR 860-032-0025(3) set forth the factors the Commission must consider in deciding whether there exists price and/or service competition for a telecommunications utility's services, or whether such services are subject to competition, or whether the public interest no longer requires full regulation of such services. These factors are as follows:

- 1. the extent to which the services are available from alternative providers in the relevant market;
- 2. the extent to which the services of alternative providers are functionally equivalent or substitutable at comparable rates, terms and conditions;
- 3. existing economic or regulatory barriers to entry; and
- 4. any other factors deemed relevant by the Commission.

Finally, ORS 759.030(7) provides that within 60 days of filing under subsections (2), (3) or (6) of ORS 759.030, the Commission shall either determine the appropriateness of the filing or determine that further investigation is necessary. If the Commission determines that further investigation is necessary, the Commission may suspend operation of the filing to allow it to investigate the filing. On August 20, 2004, the Commission suspended operation of Qwest's filing and opened a formal investigation proceeding, docketed as UX 29. Since then, a number of competitive carriers (CLECs) have intervened as parties to the docket.

Due to the appeals of the FCC's Triennial Review Order (TRO), including the D.C. Circuit's decision in the *USTA II* case and the FCC's recent Triennial Review Remand Order (TRRO), as well as various procedural motions in this docket, Qwest's petition had been delayed until very recently. However, now that the FCC has issued its TRRO, the Commission is moving forward with docket UX 29, and thus the Commission is issuing these information requests at this time.

In order for the Commission to conduct a thorough investigation of Qwest's filing, it is necessary to obtain information from competitive telecommunications carriers providing business service within Oregon. Appendix A to this Ruling is a list of information requests designed to satisfy the requirements in ORS 759.030 and OAR 860-032-0025. There are also attachments in Excel spreadsheet format for your company to populate the responsive data. The information requests were proposed initially by the parties in this docket, including Commission Staff, and were negotiated by the parties in large part. The Commission then approved the final list of questions and attachments.

Oregon Administrative Rule 860-032-0007(11) requires carriers holding certificates of authority to provide telecommunications service in Oregon "to respond in a timely manner to Commission inquiries." All of the CLECs listed on Appendix B of this Ruling hold certificates of authority, and shall file the information requested in Appendix A, and the attachments, with the Commission no later than **April 15, 2005**.

Appendix C of this Ruling is a copy of the Modified Protective Order (Order No. 05-\_\_\_)
by the Commission in this docket. The Modified Protective Order is designed to protect
"confidential" and "highly confidential" information. Carriers may designate responses to

information requests in Appendix A as "confidential" or "highly confidential" in accordance with the terms of the Modified Protective Order.

If a carrier takes the position that certain information in Appendix A should not be released to the UX 29 parties under the Modified Protective Order, then the carrier must identify the information request, or part thereof, to which it objects. For each such objection, the carrier shall set forth all reasons supporting its objection.

Once designated, the carrier's confidential or highly-confidential information will not be released to the parties unless a party requests such information. In the event any party requests any confidential or highly-confidential information of a CLEC responding to this bench request, the Commission or its Staff will promptly contact any affected CLEC and allow such CLEC to raise any objections to such disclosure within seven (7) days of such notice. Any determination of disclosure of confidential or highly-confidential CLEC information which is objected to by the CLEC providing such information will be made solely by the Commission or the Administrative Law Judge. If the Commission or the Administrative Law Judge determines to disclose any confidential or highly-confidential information to any party in the docket, any such disclosure would be subject to the protections afforded by the Modified Protective Order.

Although the PUC Staff was not the primary author of the survey questions, we recognize that carriers might have questions about them. Any questions regarding this Ruling or the information requests set forth in Appendix A may be directed to Mr. Steve Chriss of the PUC Staff at 503-378-3778.

Dated at Salem, Oregon this \_\_ day of March, 2005.

Allan J. Arlow
Administrative Law Judge

### CERTIFICATE OF SERVICE

#### UX-29

I hereby certify that on the 7<sup>th</sup> day of March, 2005, I served the foregoing **QWEST CORPORATION'S LETTER TO THE HONORABLE ALLAN ARLOW REGARDING PROPOSED CLEC SURVEY AND LIST OF CLECs** 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.

Mark P Trinchero Davis Wright Tremaine LLP 1300 SW Fifth Ave., Ste. 2300 Portland, OR 97201-5682

\*Alex M Duarte Qwest Corporation 421 SW Oak St., Ste. 810 Portland Or 97204

\*Karen J Johnson Integra Telecom Of Oregon Inc 1201 NE Lloyd Blvd. Suite 500 Portland, OR 97232

\*Lisa F Rackner Ater Wynne LLP 222 SW Columbia St. Suite 1800 Portland, OR 97201-6618

Brad Schaffer Rio Communications Inc 2360 NE Stephens Roseburg, OR 97470 \*Stephanie S. Andrus Department of Justice 1162 Court St., NE Salem, OR 97301-4096

Dennis Gabriel Oregon Telecom Inc PO Box 4333 Salem, OR 97302-8333

Rex Knowles XO Oregon Inc 111 E Broadway, Ste. 1000 Salt Lake City, UT 84111

\*Lawrence Reichman Perkins Coie LLP 1120 NW Couch St. 10th Floor Portland, OR 97209-4128

Greg Diamond Covad Communications Co 7901 Lowry Blvd. Denver, CO 80230 \*Sarah Wallace Ater Wynne LLP 222 SW Columbia, Ste. 1800 Portland, OR 97201-6618 Brian Thomas Time Warner Telecom Of Oregon LLC 223 Taylor Ave. N. Seattle, WA 98109-5017

DATED this 7<sup>th</sup> day of March, 2005.

**QWEST CORPORATION** 

By:

ALEX M. DUARTE, OSB No. 02045 421 SW Oak Street, Suite 810

Portland, OR 97204 Telephone: 503-242-5623 Facsimile: 503-242-8589

e-mail: alex.duarte@qwest.com Attorney for Qwest Corporation