

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

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 Qwest 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™ (QPP) replacement product, as well as the transition from UNE-P to QPP, to address the second concern. Qwest 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.¹

¹ 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

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.² If Your Honor is seriously considering removing the VoIP question and attachment, however, Qwest respectfully requests an opportunity to respond to Covad's brief.³

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?"⁴ 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."

² 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.

³ 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.

⁴ 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 as of 12/31/04, for each service category indicated along the horizontal axis at the top of the report, you serve via UNE-Platform 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 Qwest Platform Plus ("QPP") 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 3½ 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.⁵ 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.

⁵ 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.

Letter to Honorable Allan Arlow
March 7, 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,

A handwritten signature in black ink, appearing to read 'Alex M. Duarte', written in a cursive style.

Alex M. Duarte

cc Service List (w/ encls.)

UX 29 OPUC Bench Request to CLECs
Business Retail Switched Services in Qwest's Oregon Territory

Except as otherwise indicated, the following questions require access line and other data reports by Oregon Rate Center.¹ 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: http://nanpa.com/reports/reports_cocodes.html. 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.² 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 UNE-Platform 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."

¹ 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.

² 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 stand-alone UNE Loop 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 loop facilities self-provisioned by CLECs. Same instructions for Attachment D2, but for the business switched access lines provided via loop facilities provided by carriers other than Qwest. 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 special access purchased by your company from Qwest. NOTE: there are four tabs in the Excel workbook Attachment E; one for services provided via intrastate DSO-level special access circuits, one for services provided via intrastate DS1 and DS3 special access circuits, one for services provided via interstate DSO-level special access circuits, and the last for services provided via interstate DS1 and DS3 special access 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 quantity of lines for each service category indicated along the horizontal axis at the top of the report. Use the following business customer segments 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	Subject	Excel Attachment	Tabs	Notes
1	UNE-P	A		
2	Qwest Platform Plus ("QPP")	B		
3	UNE-L	C		
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	H		
9	Tariffs, Price Lists	None		

BUSINESS SERVICES PROVIDED VIA UNE-PLATFORM

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

(Data Vintage 12/2004)

Company Name		Please report below the number of access lines for each listed service category you provide via UNE-Platform services															
Contact Person/ Telephone Number																	
OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ANALOG PBX TRUNKS		DIGITAL PBX TRUNKS		800 SERVICE/ OUTWAITS		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																	
LEABURG																	

*NOTE: For Frame Relay and ATM services, report links.

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								
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											
SEASIDE											
SILETZ											
SISTERS											
ST. HELENS											
STANFIELD											

*NOTE: For Frame Relay and ATM services, report links.

ATTACHMENT A

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								
TOLEDO											
UMATILLA											
VENETA											
WARRENTON											
WESTPORT											
WOODBURN											

*NOTE: For Frame Relay and ATM services, report links.

BUSINESS SERVICES PROVIDED VIA QWEST PLATFORM PLUS

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

(Data Vintage 12/2004)

Company Name		Please report below the number of access lines for each listed service category you provide via Qwest Platform Plus (QPP) services										
Contact Person/ Telephone Number												
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												
LEABURG												

*NOTE: For Frame Relay and ATM services, report links.

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								
LOWELL											
MADRAS											
MAPLETON											
MARCOLA											
MEDFORD											
MILTON-FREEWATER											
NEWPORT											
NORTH PLAINS											
OAKLAND											
OAKRIDGE											
PENDELTON											
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											

*NOTE: For Frame Relay and ATM services, report links.

ATTACHMENT B

OREGON RATE CENTER	BASIC BUSINESS SERVICE (FLAT OR MEASURED)			ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWAITS	ANALOG CENTREX SERVICES	ISDN BASIC RATE	ISDN PRIMARY RATE	FRAME RELAY*	ASYNCHRONOUS TRANSFER MODE (ATM) SERVICE*
	Analog	Digital	Total								
TOLEDO											
UMATILLA											
VENETA											
WARRENTON											
WESTPORT											
WOODBURN											

*NOTE: For Frame Relay and ATM services, report links.

BUSINESS SERVICES PROVIDED VIA STAND-ALONE UNE LOOPS

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

(Data Vintage 12/2004)

Company Name _____
 Contact Person/ Telephone Number _____

Please report below the number of access lines for each listed service category you provide via stand-alone **UNE loops**

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											
LEABURG											

*NOTE: For Frame Relay and ATM services, report links.

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								
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											
SEASIDE											
SILETZ											
SISTERS											
ST. HELENS											
STANFIELD											

*NOTE: For Frame Relay and ATM services, report links.

ATTACHMENT C

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								
TOLEDO											
UMATILLA											
VENETA											
WARRENTON											
WESTPORT											
WOODBURN											

*NOTE: For Frame Relay and ATM services, report links.

BUSINESS SERVICES PROVIDED VIA LOOP FACILITIES SELF-PROVISIONED BY THE CLEC

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

(Data Vintage 12/2004)

Company Name		Contact Person / Telephone Number		Please report below the number of access lines for each listed service category you provide via loop facilities self-provisioned by the CLEC.									
OREGON RATE CENTER	WIRECENTER	CLLI	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	BEND	BENDOR24											
BLACK BUTTE	SPRING RIVER ROAD	SPRVOR02											
BLUE RIVER													
CANNON BEACH													
CENTRAL POINT													
CLACKAMAS	LAKE OSWEGO	LKOSOR62											
	MILWAUKIE	MLWKOR17											
	OREGON CITY	ORCYOR18											
CORVALLIS	CORVALLIS	CRYSOR65											
	ADAIR	ADAROR21											
COTTAGE GROVE	COTTAGE GROVE	CTGVOR53											
	CULP CREEK	CLCKOR53											
CULVER													
DALLAS	DALLAS	DLLSOR58											
	INDEPENDENCE	INDPOR58											
EUGENE	EUGENE 10TH AVE	EUGNOR53											
	EUGENE RIVER ROAD	EUGNOR28											
	SPRINGFIELD	SPFDOR01											
FALLS CITY													
FLORENCE													
GOLD HILL													
GRANT'S PASS													
HERMISTON													

*NOTE: For Frame Relay and ATM services, report links.

OREGON RATE CENTER	WIRECENTER	CLI	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								
JACKSONVILLE													
JEFFERSON													
JUNCTION CITY/HARRISBURG													
KLAMATH FALLS													
LAPINE													
LEABURG													
LOWELL													
MADRAS	MADRAS	MDRSOR52											
	WARM SPRINGS	WRSPOR52											
MAPLETON													
MARCOLA													
MEDFORD													
MILTON-FREEWATER													
NEWPORT													
NORTH PLAINS													
OAKLAND													
OAKRIDGE													
PENDLETON													
PHOENIX													
PORTLAND	BURLINGTON	BURLOR62											
	PORTLAND CYPRESS	PTLDOR02											
	PORTLAND HAROLD	PTLDOR08											
	PORTLAND ALPINE	PTLDOR11											
	PORTLAND ATLANTIC	PTLDOR12											
	PORTLAND BELMONT	PTLDOR13											
	PORTLAND BUTLER	PTLDOR14											
	PORTLAND CHERRY	PTLDOR17											
	PORTLAND PROSPECT	PTLDOR18											
	PORTLAND CAPITOL	PTLDOR69											
PRINEVILLE													
RAINIER													
REDMOND													
ROGUE RIVER													
ROSEBURG	ROSEBURG	RSBGOR57											
	WINSTON	WNTNOR57											
SALEM	SALEM MAIN	SALMOR58											
	SALEM 10TH AVE	SALMOR59											
SEASIDE													
SILETZ													
SISTERS													
ST. HELENS													

*NOTE: For Frame Relay and ATM services, report links.

ATTACHMENT D1

OREGON RATE CENTER	WIRECENTER	CLLI	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								
STANFIELD													
TOLEDO													
UMATILLA													
VENETA													
WARRENTON													
WESTPORT													
WOODBURN													

*NOTE: For Frame Relay and ATM services, report links.

BUSINESS SERVICES PROVIDED VIA LOOP FACILITIES, PROVIDED BY CARRIERS OTHER THAN QWEST

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

(Data Vintage 12/2004)

Company Name
 Contact Person/ Telephone Number
 Please report below the number of access lines for each listed service category you provide in Qwest service territory via loop facilities provided by carriers other than Qwest

OREGON RATE CENTER	WIRECENTER	CLI	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	BEND	BENDOR24											
BLACK BUTTE	SPRING RIVER ROAD	SPRVOR02											
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	CLCKOR53											
CULVER													
DALLAS	DALLAS	DLLSOR58											
	INDEPENDENCE	INDPOR58											
EUGENE	EUGENE 10TH AVE	EUGNOR53											
	EUGENE RIVER ROAD	EUGNOR28											
	SPRINGFIELD	SPFDOR01											
FALLS CITY													
FLORENCE													
GOLD HILL													
GRANTS PASS													

*NOTE: For Frame Relay and ATM services, report links.

OREGON RATE CENTER	WIRECENTER	CLI	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								
HERMISTON													
JACKSONVILLE													
JEFFERSON													
JUNCTION CITY/HARRISBURG													
KLAMATH FALLS													
LAPINE													
LEABURG													
LOWELL													
MADRAS	MADRAS	MDRSOR52											
	WARM SPRINGS	WRSPOR52											
MAPLETON													
MARCOLA													
MEDFORD													
MILTON-FREEWATER													
NEWPORT													
NORTH PLAINS													
OAKLAND													
OAKRIDGE													
PENDLETON													
PHOENIX													
PORTLAND	BURLINGTON	BURLOR62											
	PORTLAND CYPRESS	PTLDOR02											
	PORTLAND HAROLD	PTLDOR08											
	PORTLAND ALPINE	PTLDOR11											
	PORTLAND ATLANTIC	PTLDOR12											
	PORTLAND BELMONT	PTLDOR13											
	PORTLAND BUTLER	PTLDOR14											
	PORTLAND CHERRY	PTLDOR17											
	PORTLAND PROSPEC	PTLDOR18											
	PORTLAND CAPITOL	PTLDOR69											
PRINEVILLE													
RAINIER													
REDMOND													
ROGUE RIVER													
ROSEBURG	ROSEBURG	RSEGOR57											
	WINSTON	WNTNOR57											
SALEM	SALEM MAIN	SALMOR58											
	SALEM 10TH AVE	SALMOR59											
SEASIDE													
SILETZ													
SISTERS													

*NOTE: For Frame Relay and ATM services, report links.

ATTACHMENT D2

OREGON RATE CENTER	WIRECENTER	CLL	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								
ST. HELENS													
STANFIELD													
TOLEDO													
UMATILLA													
VENETA													
WARRENTON													
WESTPORT													
WOODBURN													

*NOTE: For Frame Relay and ATM services, report links.

BUSINESS SERVICES PROVIDED VIA DS0-LEVEL INTRASTATE SPECIAL ACCESS LOOPS

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

Company Name _____ (Data Vintage 1/2/2004)

Contact Person/ Telephone Number _____ Please report below the number of access lines for each listed service category you provide via DSO-level IntraState Special Access loops

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											

*NOTE: For Frame Relay and ATM services, report links.

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								
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											
SEASIDE											

*NOTE: For Frame Relay and ATM services, report links.

BUSINESS SERVICES PROVIDED VIA DS1 and DS3-LEVEL INTRASTATE SPECIAL ACCESS LOOPS

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

Company Name _____ (Data Vintage 12/2004)

Contact Person/ Telephone Number	Please report below the number of access lines for each listed service category you provide via DS1 and DS3-level intrastate Special Access loops									
	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*	
OREGON RATE CENTER	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										
LEABURG										
LOWELL										

*NOTE: For Frame Relay and ATM services, report links.

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								
MADRAS											
MAPLETON											
MARCOLA											
MEDFORD											
MILTON-FREEWATER											
NEWPORT											
NORTH PLAINS											
OAKLAND											
OAKRIDGE											
PENDELTON											
PHOENIX											
BURLINGTON											
PORTLAND ALPINE											
PORTLAND ATLANTIC											
PORTLAND BELMONT											
PORTLAND BUTLER											
PORTLAND CAPITOL											
PORTLAND CHERRY											
PORTLAND CYPRESS											
PORTLAND HAROLD											
PORTLAND PROSPECT											
PORTLAND TOTAL											
PRINEVILLE											
RATIER											
REDMOND											
ROGUE RIVER											
ROSEBURG											
SALEM MAIN											
SALEM 10TH AVE											
SALEM TOTAL											
SEASIDE											
SILETZ											
SISTERS											
ST. HELENS											
STANFIELD											
TOLDO											
UMATILLA											
VENETA											
WARRENTON											
WESTPORT											
WOODBURN											

*NOTE: For Frame Relay and ATM services, report links.

BUSINESS SERVICES PROVIDED VIA DSO -LEVEL INTERSTATE SPECIAL ACCESS LOOPS

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

(Data Vintage 12/2004)

Company Name Contact Person/ Telephone Number	Please report below the number of access lines for each listed service category you provide via DSO level Interstate Special Access loops									
	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										
LEABURG										
LOWELL										
MADRAS										
MAPLETON										
MARCOIA										
MEDFORD										

*NOTE: For Frame Relay and ATM services, report links.

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								
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											
WOODBURN											

*NOTE: For Frame Relay and ATM services, report links.

**BUSINESS SERVICES
PROVIDED VIA DS1 and DS3-
LEVEL INTERSTATE
SPECIAL ACCESS LOOPS**

AVAILABILITY OF CLEC BUSINESS SWITCHED BUSINESS SERVICES IN OREGON

(Data Vintage 12/2004)

Company Name	Contact Person/ Telephone Number	Please report below the number of access lines for each listed service category you provide via DS1 and DS3-level interstate Special Access loops									
		BASIC BUSINESS SERVICE (FLAT OR MEASURED)	ANALOG PBX TRUNKS	DIGITAL PBX TRUNKS	800 SERVICE/ OUTWAITS	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											
GRANT'S PASS											
HERMISTON											
JACKSONVILLE											
JEFFERSON											
JUNCTION CITY/HARRISBURG											
KLAMATH FALLS											
LAPINE											
LEABURG											
LOWELL											
MADRAS											
MAPLETON											
MARCOILA											
MEDFORD											

*NOTE: For Frame Relay and ATM services, report links.

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								
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											
WOODBURN											

*NOTE: For Frame Relay and ATM services, report links.

BUSINESS SERVICES PROVIDED VIA VOICE OVER INTERNET TELEPHONY		AVAILABILITY OF COMPETITIVE BUSINESS SERVICES IN OREGON	
Company Name		(Data Vintage 12/2004)	
Contact Person/ Telephone Number	<p>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.</p>		
OREGON RATE CENTER	Business VoIP Telephone Numbers in Service	Business VoIP Available? (Yes/No)	
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			

OREGON RATE CENTER	Business VoIP Telephone Numbers in Service	Business VoIP Available? (Yes/No)
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		
SEASIDE		
SILETZ		

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

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 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 dba DataVision Communications

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.¹ 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

¹ 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 [REDACTED] 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-[REDACTED]) by the Commission in this docket. The Modified Protective Order is designed to protect "confidential" and "highly confidential" information. Carriers may designate responses to

Oregon No. 27, sections 5 and 107, on file with the Commission.

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 7th 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

*Stephanie S. Andrus
Department of Justice
1162 Court St., NE
Salem, OR 97301-4096

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

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

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

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

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

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

Brad Schaffer
Rio Communications Inc
2360 NE Stephens
Roseburg, OR 97470

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 7th 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