

the Commission order Qwest to withdrawal its filing and re-file the appropriate tariff and SGAT amendments. As grounds therefore, AT&T states as follows:

INTRODUCTION

Qwest entitles its recent filing a “compliance” filing, but files neither amended SGAT language nor amended tariffs. Furthermore, Qwest claims that it is not actually seeking even longer intervals through this “compliance” filing, but proceeds to argue in favor of their adoption. The FCC made clear that it expected amended SGATs and tariffs, not an interim matrix² that confusingly overlooks the actual implementation of the permanent and interim intervals by leaving in place language and contradictory terms from § 8.4 of the SGAT. Through this response, AT&T seeks a remedy to the less-than-compliant and confusing filing submitted by Qwest. In addition, while AT&T fully intends to address Qwest’s arguments for even longer intervals, whenever Qwest decides to officially present them in this forum, AT&T must, nevertheless, address today the misleading assertions made in the arguments for their adoption.

DISCUSSION

Prior to addressing Qwest’s arguments for longer intervals, it is important to clearly understand the FCC’s orders in relation to nationally imposed provisioning intervals for physical collocation and the interim relief granted to Qwest. Based upon that understanding, AT&T will then examine the actual compliance of Qwest’s “compliance” filing. Upon completion of that discussion AT&T will address Qwest’s arguments for obtaining blanket extensions of the collocation intervals.

² Qwest Compliance Filing Attachment B.

I. THE FCC’S PRONOUNCEMENTS DO NOT SUPPORT QWEST’S ALLEGED “COMPLIANCE” FILING OR ITS ARGUMENTS AIMED AT GENERALLY AVOIDING THE 90 DAY PHYSICAL COLLOCATION INTERVALS.

“In a physical collocation arrangement, a competitor leases space at an incumbent LEC’s premises for its equipment.”³ The FCC’s recent Reconsideration Order determined, among other things, that:

an incumbent LEC should be able to complete any technically feasible physical collocation arrangement, whether caged or cageless, no later than 90 calendar days after receiving an acceptable collocation application, where space, whether conditioned or unconditioned, is available in the incumbent LEC premise and the state commission does not set a different interval or the incumbent and requesting carrier have not agreed to a different interval.⁴

This statement and its meaning are fairly straightforward; only two circumstances should relieve an incumbent from meeting the 90 day interval where space is available: (a) a state commission’s different intervals or (b) a mutual agreement between the competitive local exchange carrier (“CLEC”) and the incumbent local exchange carrier (“ILEC”).

The FCC did not perceive the 90 day standard interval as imposing an undue hardship on incumbents; rather, the FCC stated:

[b]ased on the record before us, we believe ... that a maximum 90 calendar day interval will give an incumbent LEC ample time to provision most, if not all, physical collocation arrangements. We recognize, of course, that many incumbent LECs will have to improve their collocation provisioning performance significantly in order to meet this interval. Significant improvement is needed, however, only where incumbent LECs have taken insufficient steps to ensure the adequacy of their collocation provisioning processes. ... Incumbents already have extensive experience with handling large numbers of collocation applications on an ongoing basis. This experience should enable them to upgrade their internal controls, methods, and procedures to the extent necessary to provision all,

³ FCC Reconsideration Order at 7, ¶ 9.

⁴ *Id.* at 16, ¶ 27.

or virtually all, physical collocation arrangements in no more than 90 calendar days.⁵

In fact, the FCC found that intervals significantly longer than 90 days would generally impede the CLEC's ability to compete effectively.⁶ To that end, the FCC amended its rules to state:

[a]n incumbent LEC must offer to provide and provide all forms of physical collocation (i.e., caged, cageless, shared, and adjacent) within the following deadlines, except to the extent a state sets its own deadlines or the incumbent LEC has demonstrated to the state commission that physical collocation is not practical for technical reasons or because of space limitations.

47 C.F.R. § 51.323(l). Ultimately, then, there are three general exceptions to the 90 day interval: (a) state deadlines; (b) mutually agreed to deadlines between CLEC and ILEC; and (d) lack of space in the premises.

On November 7, 2000, the FCC issued its Memorandum Opinion and Order ("Memorandum")⁷ in response to Qwest's request for a waiver of the imposition of the 90 day intervals pending the FCC's consideration of Qwest's Reconsideration Petitions. In its Memorandum, the FCC clarified that:

The Collocation Reconsideration Order *does not permit an incumbent LEC to set unilaterally different standards* by incorporating time periods of its own choosing into its SGATs and tariffs and having those standards take effect through inaction by the state commission. Indeed, such an approach would eviscerate the Commission's intent in the Collocation Reconsideration Order to establish national standards applicable *except* where specifically modified through interconnection agreement negotiations or deliberative processes of a state commission.⁸

⁵ *Id.* at 17, ¶ 28.

⁶ *Id.* at 18, ¶ 29.

⁷ In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability, Memorandum Opinion and Order, CC Docket No. 98-147, DA 00-2528 (Released Nov. 7, 2000) [hereinafter "Memorandum"].

⁸ *Id.* at 4, ¶ 7 (emphasis added).

Although Qwest wanted to unilaterally alter the intervals in its SGAT and was denied the option, Qwest continues in its efforts to do just that by, among other things, leaving unapproved exceptions in its SGAT as to when it will and will not meet the 90 day interval or its interim intervals.⁹ These unilateral declarations were not approved by the FCC in its consideration of Qwest's waiver, and should, therefore, not be allowed to go into effect on an interim or permanent basis here. That is, SGAT § 8.4 should be amended to reflect only the temporary relief granted to Qwest and no more.

Moreover, the FCC addressed only the intervals not the entirety of Qwest's SGAT § 8.4, which among other things defies the FCC's provisioning intervals for adjacent collocation and probably for remote collocation as well. Furthermore, the specific scope of the forecasts obligation thrust upon the competitors by Qwest was not considered by the FCC and therefore, this Commission must decide what information should be included in these interim forecasts, and ultimately whether forecasts should be required at all as a precondition to Qwest's timely provisioning of collocation space.

In addition to addressing unilateral action, the FCC also clarified that its waiver limited Qwest to:

increase the provisioning interval for a proposed physical collocation arrangements no more than 60 calendar days in the event a competitive LEC fails to timely and accurately forecast the arrangement We expect Qwest to use its best efforts to minimize any such increases¹⁰

Qwest, therefore, was given no more than an additional 60 days for provisioning unforecasted requests, and it was further expected to minimize that time period.

⁹ See e.g., SGAT § 8.4.3.4 (unilaterally altering intervals based on forecasts) and § 8.4.5.1(demanding negotiated intervals for all adjacent collocation arrangements). (See updated SGAT Sections 4, 6, 7, and 8 filed by Qwest on November 6, 2000.

¹⁰ Memorandum at 9, ¶ 19.

In short, what Qwest has done is file a matrix that neither conforms its tariffs or the SGAT to the limited relief granted by the FCC. Rather, what Qwest is attempting to do is chip away at its obligation to meet the FCC's 90 day interval by creating exception, after exception and leaving those within its SGAT. For example, Qwest's SGAT demands that the CLECs provide very specific forecasts, demanding much of the same detailed information found in an application, before Qwest will agree to meet the 90 day interval.¹¹ Thus, even where space is available and Qwest could otherwise meet the interval, it—nevertheless—refuses to do so and gives itself another two months to provision the collocation request by demanding a “pre-application” a/k/a forecast 60 days in advance of the actual order. Five months is simply an outrageous amount of time to obtain collocation, particularly in the case of cageless physical collocation requests where appropriate space is readily available whether forecasted or not. Moreover, it appears that Qwest is doing little else than arbitrarily lopping off 30 days, of the 60 additional days, to minimize the extended time frames for unforecasted collocation requests. There is no reason that Qwest shouldn't be required to actually minimize the delay and meet the 90 day provisioning interval where space is available regardless of its receipt of a forecast; the FCC certainly did not preclude such action, and in fact, admonished Qwest to “use best efforts to minimize increases.”¹² Because the FCC did not specifically approve of the detailed forecasts that Qwest demands in its SGAT or any of the other extensions of time in the SGAT and because Qwest is not exactly complying with the FCC's orders, this Commission should, order Qwest to re-submit its filing after it

¹¹ Compare SGAT § 8.4.1.4 (outlining the information demanded in a forecast) and § 8.4.1.5 (outlining the information that constitutes an application).

¹² Memorandum at 9, ¶ 19.

conforms such filing to the FCC's order. The confusion created by the present filing and the actual SGAT is described in greater detail below.

II. QWEST ERRONEOUSLY IMPLIES THAT THE FCC ALLOWS INCUMBENTS, WITHOUT MORE, TO DEMAND SPECIFIC, DETAILED FORECASTS AS A PRECONDITION TO ANY OBLIGATION TO COMPLY WITH THE STANDARD 90 DAY INTERVAL.

In its filing, Qwest implies, by omission of a critical portion of the quote, that the FCC allows an incumbent LEC to unilaterally require a CLEC to forecast, with specificity and accuracy, its physical collocation demands as a precondition to receiving the standard intervals.¹³ What the FCC actually said was:

[a]n incumbent LEC also may require a competitive LEC to forecast its physical collocation demands. *Absent state action requiring forecasting*, a requesting carrier's failure to submit a timely forecast *will not* relieve the incumbent LEC of its obligation to comply with the time limits set forth in this section. Similarly, an incumbent LEC may penalize an inaccurate collocation forecast by lengthening a collocation interval only if the state commission affirmatively authorizes such action.¹⁴

Qwest follows its slanted forecast assertion with the statement that the FCC's interim standards for Qwest include a forecasting obligation as a precondition to receiving the 90 day interval. Two things are important to remember in relation to the relief that Qwest obtained from the FCC. First, the FCC provided Qwest with only a temporary conditional waiver in the absence of state rules. Second, the FCC did not contemplate that Qwest had failed to obtain the necessary approval for forecasting as a precondition to meeting all the required intervals from this Commission nor that the forecasts that Qwest demands in its SGAT are closer to applications for collocation than real forecasts.

¹³ Qwest Compliance Filing at 3; in fact, Qwest's FCC waiver request was nothing more than an end-run around the State's right to consider the appropriate use of forecasting.

¹⁴ FCC Reconsideration Order at 22, ¶ 39.

Examination of the FCC's Memorandum makes clear that such unilateral action is contrary to the FCC's intent.¹⁵

The forecasting obligation that Qwest would like to thrust upon its competitors is contained in SGAT § 8.4.1.4. It states:

CLEC shall submit an annual forecast, updated at the end of each quarter, of its future Collocation requirements. The quarterly forecast shall be reviewed by CLEC and the Qwest Account team. ... The forecast shall include, for each Qwest premises, the following:

- a) Identification of the Qwest Premise;
- b) Floor space requirements, including the number of bays for a cageless collocation arrangement;
- c) Power requirements;
- d) Heat Dissipation;
- e) Type of collocation (e.g., caged physical, cageless physical, shared, virtual, etc.);
- f) Collocated equipment;
- g) Entrance Facility type;
- h) Type and Quantity of Terminations;
- i) Date CLEC expects to submit its Collocation Application; and
- j) Date CLEC expects the collocation arrangement to be completed.

This is simply an abusive, oppressive forecasting obligation that demands a ridiculous amount of specific information for a "forecast," which by its very definition should be nothing more than an educated guess on where one expects to collocate within the coming year. Moreover, all Qwest has to do is claim that the competitors forecast wasn't "accurate" to avoid altogether the obligation to meet the 90 day interval. In fact, if the CLEC has to produce this kind of specificity in its forecasts, it might as well just file an application.

The SGAT further demands the following of an application:

CLEC shall submit a Collocation Application to order collocation at a particular Qwest Premises. A Collocation Application shall be considered complete, if it contains:

¹⁵ See *supra* footnote 8.

- a) Identification of the Qwest Premises;
- b) Floor space requirements, including the number of bays for a cageless collocation arrangement;
- c) Power requirements;
- d) Heat Dissipation;
- e) Type of collocation (e.g., caged physical, cageless physical, shared, virtual, etc.);
- f) Collocated equipment;
- g) Entrance Facility type;
- h) Type and Quantity of Terminations;
- i) Alternate form of collocation if first choice is not available;
- j) Billing Contact; and
- k) Other Information required by the Collocation Application Form.¹⁶

SGAT § 8.4.1.5. Comparing the lists required for forecasts to the lists required in an application clearly demonstrates that the two are close to identical.

The FCC never approved this abusive forecasting obligation as a precondition to meeting the appropriate installation intervals, nor has this Commission. In fact, Qwest never even mentioned it in its FCC waiver, nor the fact that no state commission to date has approved such an abusive practice. Therefore, AT&T requests that the Commission clarify that forecasting obligations under the FCC's interim order require only that the CLEC provide the following information to Qwest and that Qwest modify its SGAT in accordance herewith:

CLEC shall submit a forecast at least 60 days in advance of its Collocation Application. Qwest shall maintain all such forecasts as confidential documents limiting access thereto to only those who need to know and in no case allowing access to marketing or strategic planning personnel.¹⁷ Forecasts shall include, the following:

- a) Identification of the Qwest Premises;
- b) Approximate floor space requirements;

¹⁶ See **Exhibit A** the actual Qwest Collocation Application that shows the required information, which is predominately the same as that demanded in the forecasts § 8.4.1.4 of the SGAT; *cf.* § 8.4.1.5 (on required information in a completed application).

¹⁷ The FCC's Memorandum also states that Qwest must "use collocation forecasts obtained from the [CLEC] only for the purposes of providing that carrier with reasonable and nondiscriminatory collocation arrangements." Memorandum at 9, ¶ 19.

- c) The anticipated type of collocation (e.g., caged, cageless, or virtual) and type of equipment; and
- d) Date CLEC anticipated submitting the Collocation Application.

To demand much more than this is tantamount to providing Qwest with a pre-application Collocation Application and a five-month installation opportunity; clearly, that is not a legitimate forecast nor consistent with the FCC's intent. There is no reason that Qwest should be allowed to stall a competitor's collocation and the competition generated therefrom for nearly half a year simply because it demands that CLECs provide unbelievable detail and specificity in their forecasts.

III. IN ADDITION TO CLARIFYING THE INTERIM FORECASTING OBLIGATION, QWEST SHOULD ALSO AMEND ITS SGATS TO CORRECTLY REFLECT THE OBLIGATION DEFINED BY THE FCC'S ORDER.

As its "compliance" filing, Qwest apparently submitted Attachment B to its pleading as the "compliant" amendments to its SGATs and tariffs. Attachment B defines collocation installation intervals that purport to reflect Qwest's obligation under the FCC's Memorandum. The FCC in its waiver order, however, did not expressly address or approve Attachment B, and the Memorandum order only granted Qwest "partial" approval of its request.¹⁸ The Memorandum stated:

Qwest proposes that we condition its waiver on alternative standards that provide for a ten-day application processing and either a 45-day or 90-day provisioning interval when the requesting carrier has provided a collocation forecast to Qwest at least 60 days prior to submitting its physical collocation application. Qwest proposes, however, a 20-day application processing interval and provisioning intervals ranging from 90 to 240 days when the requesting carrier has not provided a collocation forecast within that timeframe. ...¹⁹

¹⁸ Memorandum at 5, ¶ 9 ("We also grant, *in part*, the petitions of Verizon, SBC and Qwest for conditional waivers ...").

¹⁹ Memorandum at 9, ¶ 18.

To a large extent, the application processing and provisioning intervals Qwest proposes are equal to or shorter than the intervals adopted as national standards in the *Collocation Reconsideration Order*. Accordingly, this set of relatively short intervals meets our waiver criterion. We also find Qwest’s proposed reliance on forecasts reasonable as an interim measure to the extent it permits a 60-day increase in interval length when the carrier requesting collocation has failed to provide a timely and accurate forecast. We therefore will allow Qwest to increase the provisioning interval for a proposed physical collocation arrangement no more than 60 calendar days in the event a competitive LEC fails to timely and accurately forecast the arrangement, unless the state commission specifically approves a longer interval. We expect Qwest to use its best efforts to minimize any such increases²⁰

The intervals adopted in the national standards are all measured from the date Qwest receives a complete application. The FCC granted Qwest’s waiver request to the extent its provisioning intervals were less than or equal to the national standard; thus, “this set of relatively short intervals” met waiver criterion. Furthermore, the FCC allowed only an increase of 60 calendar days where the carrier failed to forecast and the 60 days should only be used if necessary. What Qwest has filed with this Commission does not comply with this order, and the intervals described in the SGAT itself allow numerous opportunities for Qwest to lengthen the intervals (e.g., § 8.4.3.4.3 describes the 120 day installation period that may be unilaterally extended if Qwest decides additional time for “implementation of structure” required to support the collocation request is necessary.)

In addition, Qwest has failed to amend its SGAT such that it complies with the national standards or the interim standards that have not been waived in relation to certain types of collocation. For example, SGAT § 8.4.5 on Adjacent Collocation makes all installation intervals in adjacent collocations subject to negotiation. This is a clear violation of the FCC’s orders and Qwest’s obligations thereunder. In addition, remote

²⁰ Id. at 9, ¶ 19 (emphasis added).

collocation should also receive the same intervals as any other type of physical or virtual collocation. The FCC did not provide Qwest with any other alternatives.

The reason express amendment to the SGAT is necessary is that Qwest has made clear in workshop discussions that it does not treat adjacent collocation and remote collocation the same way it treats the physical and virtual collocation. Thus, the Commission should demand that Qwest expressly provide for the installation of these types of collocation in compliance with the FCC's orders.

In addition to requiring that Qwest actually make a compliant "compliance" filing, AT&T offers the following arguments in opposition to Qwest's claims for longer intervals.

IV. QWEST INCORRECTLY CLAIMS THAT ALL ILL-DEFINED "MAJOR INFRASTRUCTURE MODIFICATIONS" REQUIRE INSTALLATION INTERVALS LONGER THE 150 DAYS, AND THAT IT SHOULD, THEREFORE, BE GRANTED A BLANKET WAIVER OF THE INSTALLATION INTERVALS FOR SUCH MODIFICATIONS.

In its compliance filing, Qwest defines "major infrastructure modifications" as those modifications that "*include* the addition of (a) DC Power Plants; (b) AC Standby Generators; (c) HVAC; and (d) Space Conditioning."²¹ Frankly, it is hard to imagine a broader definition. To adopt such a proposal would be nothing short of giving Qwest *carte blanche* to call every space adjustment a "major infrastructure modification." In fact, examples abound wherein it should take Qwest significantly less than five months (150 days) to modify or "recondition" space to accommodate a collocation request; removing obsolete equipment is but one. Certainly, the FCC has already rejected the

²¹ Compliance Filing at 5, ln. 1 (emphasis added).

claim Qwest is making here when it said the 90 day interval applies whether the space is conditioned or not.²²

Moreover, the FCC's rules contemplate the need for ILECs to obtain longer intervals when necessary. To that end, the rules provide an opportunity for the state commission to grant longer intervals upon a proper showing of need.²³

In reality, Qwest has all the relief opportunities it needs should it encounter a genuine inability to meet the collocation intervals. Its doubtful that many CLECs would insist that Qwest meet such intervals where it is truly impossible to do so, and even if a CLEC did behave in such a manner, Qwest has all the recourse it needs in the FCC's and this Commission's waiver rules.

V. AS WITH ITS CLAIMS REGARDING "MAJOR INFRASTRUCTURE MODIFICATIONS," QWEST OVERSTATES THE INSTALLATION INTERVALS FOR ADJACENT COLLOCATION AND REMOTE COLLOCATION IN THE HOPES OF AGAIN ACQUIRING A BLANKET WAIVER FROM THE INTERVALS.

Qwest claims in its compliance filing that it will seek two "limited" exceptions to the 90 day installation interval.²⁴ Those exceptions are: (1) "where the CLEC's collocation application requires Qwest or the CLEC to construct new space to accommodate adjacent collocation; and (2) where the CLEC seeks remote collocation and Qwest must obtain new rights of way to complete the collocation."²⁵ Curiously, its SGAT makes all installation intervals for adjacent collocation subject to negotiation,²⁶ and—likewise—the SGAT is silent on the intervals for obtaining remote collocation.

²² See *infra* footnote 3.

²³ 47 C.F.R. § 51.323(l).

²⁴ Compliance Filing at 6, ln. 17.

²⁵ *Id.*

²⁶ SGAT § 8.4.5 "Ordering Adjacent Collocation" note also that Qwest's Compliance filing Attachment B is silent on provisioning intervals for remote and adjacent collocation.

While Qwest claims that such instances are “rare,” it would appear to be so since it has yet to provide evidence of even a single instance wherein additional rights of way were necessary in remote collocation or an adjacent structure had to be built.

To start, one must recall that the FCC has clearly stated that where space is legitimately exhausted, the 90-day intervals are subject to change.²⁷ This would hold true for adjacent and remote collocation spaces as well as other premises. On the other hand, where adjacent or remote space is available without the need for substantial construction, the FCC has determined that the 90-day intervals apply.

Here again, Qwest has taken extreme examples and attempted to create a blanket waiver. Not all adjacent structures, even if constructed from the ground up, would require months more time than the 90-day interval would allow for Qwest or the CLEC to build such a structure. Clear examples are CEVs and environmental huts either of which can serve as adjacent or remote collocation sites. AT&T maintains that Qwest already has all the relief opportunities it would need in these “rare” instances. For example, should the type of adjacent structure that needs to be constructed warrant more than the 90-day interval, Qwest can seek agreement from the CLEC or the Commission. Likewise, if a real right of way issue exists, then Qwest can seek the necessary relief.

CONCLUSION

For the foregoing reasons, AT&T requests that the Commission instruct Qwest to withdraw its “compliance” filing and order Qwest to re-file a document that is consistent with the FCC’s orders. In the alternative, Qwest should clarify its current filing to expressly provide for remote and adjacent collocation intervals within the interim time

²⁷ 47 C.F.R. § 51.323(l).

frames allowed by the FCC, and the required “forecasts” should mirror those described herein. AT&T requests that the Commission consider—whenever the time is ripe for such consideration—that Qwest already has sufficient mechanisms at its disposal to obtain relief from the intervals in those “rare” cases that they are needed.

Respectfully submitted this 15th day of December, 2000.

**AT&T COMMUNICATIONS OF THE
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COLLOCATION APPLICATION and CO-PROVIDER (CLEC) INFORMATION FORM

* For Direct Connections use separate form "Direct Connection (DC-POT) with Collocation Application Form"

Web Site Address: http://www.uswest.com/wholesale/productsServices/irrg/collocation_products.html

DENOTES A REQUIRED ENTRY FIELD(S) - depending on the fields input, an indicator may appear. Not all required fields may highlight however, e.g. checking the augment field will not trigger the Power Requirements fields (although the augment request may encompass additional power needs). Co-Provider to review/complete all applicable fields for input.



I. GENERAL ORDERING INFORMATION

A. CO-PROVIDER IDENTIFICATION

<input checked="" type="checkbox"/>	1. Co-Provider Name	<input type="text"/>	
<input checked="" type="checkbox"/>	2. Co-Provider ACNA Code	<input type="text"/>	
<input checked="" type="checkbox"/>	3. Co-Provider Contacts		Co-Provider Project Manager
	a. Name	<input type="text"/>	<input type="text"/>
	b. Address		
<input checked="" type="checkbox"/>	1). Street	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	2). City	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	3). State/Zip Code	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	c. Toll Free Tele No	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	d. Facsimile Number	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	e. Title	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	f. e-mail address	<input type="text"/>	<input type="text"/>
	4. Billing Information		
		Recurring Billing	Non-Recurring (if different than Recurring)
<input checked="" type="checkbox"/>	a. Billing Name	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	b. Billing Name ACNA	<input type="text"/>	
	c. Address		
<input checked="" type="checkbox"/>	1). Street	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	2). City	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	3). State/Zip Code	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	d. Toll Free Tele No	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	e. Facsimile Number	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	f. Title	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/>	g. e-mail address	<input type="text"/>	<input type="text"/>

B. DATE APPLICATION SENT TO U S WEST

C. 48 HOUR CALL
 Check if Co-Providers requests a call with U S WEST within 48 hours of receipt of a valid application.

D. CUSTOMER INTERCONNECTION CONTRACT NUMBER

E. TARIFF/CONTRACT ORDERING INFORMATION (Check the one applicable to this order)

<input type="checkbox"/>	Interstate Tariff
<input type="checkbox"/>	State Tariff
<input type="checkbox"/>	Interconnection Contract
<input type="checkbox"/>	Parallel Process

F. APPROVED INTERCONNECTION BUILD INTERVAL (check one applicable to this order- refer to your Interconnection Agreement for the interval associated with the type of collocation being ordered)

<input type="checkbox"/>	90 Days
<input type="checkbox"/>	45 Days

G. U S WEST ACCOUNT TEAM REPRESENTATIVE

1. Name	<input type="text"/>
2. Telephone Number	<input type="text"/>
3. e-mail address	<input type="text"/>

H. TYPE OF ORDER (Check One)

- Initial Presence
- Augment (after 50% down payment sent to U S WEST (USW) on prior, unrelated order)
- Change (prior to 50% down payment sent to USW on related order)
- Cancellation of pending job
- Virtual to Cageless Conversion
- Decommission

1. An augment or change request submitted to USW during the feasibility, quote, or construct phases of the collocation job may impact the Ready for Service (RFS) date.
2. A Change Order submission will require a revised quote from U S WEST. An Augment Order may require a QPF if contractually applicable. Please complete all applicable pages of this application when requesting an augment or change.
3. An augment is requested and performed on a completed collocation site or a collocation site request that has been accepted by the Co-Provider and for which 50% down payment has been received.
4. An augment or change to a collocation site can be a minor or major addition or reduction of the quantity of element(s) which are part of a collocation site.
5. A change order is any change requested on an active (accepted) collocation order prior to receipt of the 50% down payment. When a change order is accepted, the order clock re-starts.
6. An augment request may require the creation of secondary CLLI Code(s).

I. CENTRAL OFFICE LOCATION

<input checked="" type="checkbox"/>		Central Office Name
<input checked="" type="checkbox"/>		Street Address
<input checked="" type="checkbox"/>		City
<input checked="" type="checkbox"/>		State
		If Augment/Change/Decommission, original Job ID (BAN #) from APOT

CLEC Common Language Location Identifier (CLLI)

	8 Character Central Office CLLI if initial application
	11 Character CLLI Code if Co-Provider already has presence in office

J. EXISTING COLLOCATION TYPE (Check as Applicable)

- Virtual
- Caged Physical
- Cageless Contiguous Physical
- Cageless Non-Contiguous Physical
- ICDF Collocation
- Shared Space Caged Physical
- Adjacent Space

K. REQUESTED COLLOCATION TYPE (initial presence, additional presence, or conversion in an office)

To limit delays in the application process, the Co-Provider can choose an alternative form of collocation. If an alternate choice is made, USW requires the application to reflect all information pertinent to both choices.

	1st Choice (check one)	2nd Choice (check one-optional)
Virtual	<input type="checkbox"/>	<input type="checkbox"/>
Caged Physical	<input type="checkbox"/>	<input type="checkbox"/>
Cageless Contiguous Physical	<input type="checkbox"/>	<input type="checkbox"/>
Cageless Non-Contiguous Physical	<input type="checkbox"/>	<input type="checkbox"/>
ICDF Collocation	<input type="checkbox"/>	<input type="checkbox"/>
Shared Space Caged Physical	<input type="checkbox"/>	<input type="checkbox"/>
Adjacent Space	<input type="checkbox"/>	<input type="checkbox"/>
Virtual to Cageless Conversion	<input type="checkbox"/>	<input type="checkbox"/>

Note: adding an additional presence in an office, e.g. added a cageless line-up in an office where a Co-Provider already has a caged presence, will generate the creation of a second 11 character Co-Provider CLLI, additional APOT, etc.

III. COLLOCATION PRODUCT SPECIFICATIONS

A. CIRCUIT DETAIL (input quantities desired)

	UNE's	Splitter Collocation	Finished Services/ Leased Private Lines	Copper DMARC (Administrative)	ICDF Collocation	CLEC to CLEC	(future use)	(future use)	(future use)	(future use)	Total Circuits	Minimum Increments (Total Circuits)
1. Existing Circuit Counts (enter quantity(s))	POTS											1
	POTS											100
	DS0											100
	DS1											28
	DS3											1
	Fiber											12
2. New/Additional Circuit Counts Requested (enter quantity(s))	POTS											1
	POTS											100
	DS0											100
	DS1											28
	DS3											1
	Fiber											12

B. SYNCHRONIZATION REQUIREMENTS

- Does the Co-Provider require U S WEST to provide synchronization (check if yes)?
- If the response to B.1. above is yes please indicate the type of signal requested (check one)
 - T1 (DS1) Capacity (TOTA)
 - Composite Clock (TOCA)
- If the response to B.1. above is yes please fill in the number of leads required, e. g. 1 or 2.

C. POWER REQUIREMENTS

- DC Power Requirements
 - General Information
 - Virtual Collocation: power leads will be provided as part of the equipment shelf or bay. No more than 40 amps of power will be provided to each relay rack.
 - Caged/Cageless Collocation: -48V DC Battery and Battery Return are provided. Power feed supply is defined as a primary power cable or group of cables designated as "A", and another redundant power cable or group of cables designated as "B" and the associated power cable returns. 1 Feed = A & B (4 wires).
 - U S WEST will fuse at an appropriate level above the requested amount. Breaker/fuse size to be determined solely by U S WEST.

b. Power Request

- Does the Co-Provider require new or a change in existing DC Power leads (check if yes)?
- If yes checked above, fill in the number of amps/feeds requested

Amps Required per Feeder	Amperage (write in value)		Number of Requested Feeds		
	Existing (if appl)	New/Additional	Existing (if appl)	New/Additional	Total Required
20 amps					
30 amps					
40 amps					
>40 amps (write in value)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

- If leads of 41 amps or more was entered above, please provide the following information.

Forecasted Heat Dissipation (enters values in Watts)	Initial	3 Months	6 Months	1 Year	Ultimate
	<input type="text"/>				

2. AC Power Requirements

- General Information: U S WEST provides a 120v AC circuit with 3 convenience outlets, per local building code, with Non-Essential power (Non-Essential Power is not backed up by the Engine-Alternator; Essential is). Additional charges will apply for these additional feeds, and will be based on full-time use.
- Note: Standard design parameters call for the placement of a shared AC outlet at every third bay in a U S WEST line-up, including those containing Co-Provider bays and equipment.
- Does the Co-Provider require additional AC Power leads (check if yes)?
- If yes checked above, fill in the following

1). Voltage Phase (check one)

Single Phase
 Three Phase

2). Ampere size (enter quantity)

3). Quantity of AC outlets

D. GROUNDING REQUIREMENTS

A separate grounding bar will be placed in any collocation site that is physically separated from USW line-ups. Sites placed in USW line-ups will be grounded to the line-up stringer, in the same manner as other USW frames in that line-up.

Does the CLEC equipment use frame return (power circuit completed by using the relay rack iron work)?
Note: This is not the preferred method and is prohibited for Virtual Collocation. Most equipment should be powered with paired battery and return leads; however, if the customer uses frame return, U S WEST needs to know in order to properly size the grounding cables.

E. ENTRANCE FACILITIES

1. Entrance Facility Type Requested (check one)
 Fiber (ordering increment: 12 fibers)
 Leased Private Line (check service type and complete the associated Finished Services section).
 DS1
 DS3
 Fiber
 Copper Entrance Facility (considered a BFR and handled accordingly).
 Microwave
 Unbundled Network Elements
 Other (reviewed on a case-by-case basis, considered a BFR and handled accordingly).

2. Additional Informational Requirements

a. Entrance Fiber Configuration

1). Note: U S West requires the CLEC's entrance fiber be spliced at a designated Point of Interface (POI) to USW.

2). Fiber Entrance Type (check one if applicable)

Co-Provider will provide fiber entrance to POI (Standard Fiber Cable Entrance Configuration).
 Co-Provider requests that fiber entrance be Express to collocation site.
 Utilize existing fiber entrance (indicate cable name/count, e.g. LG11, 1-12@ENT 1)

Entrance 1
 Entrance 2

3). Is Diverse Dual Entrance Requested (if yes also provide info in the Cable Requirement section)

a). If Diverse Dual Entrance is not available does the Co-Provider require the number of fibers spliced into the available entrance be doubled (check if yes)?

b). Note: Diverse building entrances are available where USW currently has dual entrances and where spare ducts are available to accommodate the request.

c). Note: All entrance fibers identified will be spliced by U S WEST.

4). Fiber Connector Type at Co-Provider Site (e.g. FC-PC, ST, D4, etc.)

b. Standard Fiber Cable Entrance Configuration Information

1). Number of Fibers to be spliced per entrance onto U S WEST
Shared Facilities at POI(s) (increments of 12)

ENT 1 ENT 2

2). Co-Provider Fiber Counts and Type at POI(s)

ENT 1 ENT 2

a). Number of fiber cables placed

b). Number of fibers in each cable

c). Diameter of cables (enter dimension in inches)

3). General Information

a). Cable manufacturer

b). Type of fiber (enter SOCC Code)

4). Loss of Decibels per Kilometer (enter quantity)

F. DECOMMISSIONING DETAILS

1. Type of Decommission (from Section 1)

Complete
 Partial

2. Type of Existing Collocation Configuration to be Decommissioned (check all applicable).

Virtual
 Caged Physical
 Cageless Contiguous Physical
 Cageless Non-Contiguous Physical
 ICDF Collocation

- CLEC to CLEC
- Shared Space Caged Physical
- Adjacent Space

3. If Virtual Collocation is checked above, does the CLEC require an inspection of the Equipment? (check if yes)

4. Critical Dates (enter month/day/year)

	Date all Customer Services will be removed from Co-Provider Equipment
	Anticipated date of equipment decommissioning.
	Date power feeds to be disconnected.

5. Decommissioning Information:

a. Equipment Location (Virtual and Cageless Physical Collocation only):

Manufacturer/Model Number	Dimensions	Quantity	Location (bay/panel numbers, if assigned)

b. Grounding:

- 1). Does any of the equipment being removed use a frame return? (check if yes)
- 2). If all the equipment (including frame) is being removed, can all of the grounding be removed? (check if yes)

c. Space:

1). Type of space to be decommissioned

- Caged Area
- Cageless Contiguous Line-Up
- Cageless Non-Contiguous Line-Up
- Virtual Space

2). Space to be decommissioned

a). Caged Area (enter Square Feet)

Current	Decommission	Remaining

Note: if a portion of the caged area is to remain, attach a detailed drawing of the current and requested floor space (foot print).

b). Cageless Line-Up

Floor Number(s)	Relay Rack Number(s)

c). Virtual Space

Floor Number(s)	Relay Rack Number(s)	Panel Number(s)

3). CLEC Site DMARC

- a). Does the decommissioned equipment include a CLEC Site DMARC(s)? (check if yes)
- b). Will the DMARC(s) have to be moved (partial decommissioning)? (check if yes)
- c). If yes, what is the new location(s) of the DMARC(s)?

Service Level	Floor Number(s)	Relay Rack Number(s)	Panel Number(s)
DS1			
DS3			

- U S West
- Co-Provider

- d. If Co-Provider is Providing DMARC panel(s), please identify:
- 1). Manufacturer of Panel
 - 2). Model Number of Panel
 - 3). Configuration of DMARC panel(s), please identify:
 - DS1 Only
 - DS3 Only
 - DS1 and DS3 Combination Panel
 - Fiber Distribution Panel
 - 4). Quantity of panel(s)
 - DS1 Only
 - DS3 Only
 - DS1 and DS3 Combination Panel
 - Fiber Distribution Panel

e. Please provide a sketch of the requested DMARC Installation, see instructional box below.

Editable Sample Sketches have been provided for your convenience, please verify you meet the following requirements:

- Microsoft PowerPoint 97 or greater.
- Understanding and the ability to use picture editing functions of Microsoft PowerPoint
- Live connection to the Internet to download the sample sketches

To Download the Sample Sketches - please go to the following web address
<http://www.uswest.com/carrier/guides/interconnect/htm1/downloads/FDMARCSk.ppt>

To Download editing instructions for Sketches - please go to the following web address
<http://www.uswest.com/carrier/guides/interconnect/htm1/sketches.htm1>

5. Note: Standard BNC connectors are to be used for all Co-Provider DS3 terminations when the DMARC is in the Co-Provider's site.

B. SPLITTER COLLOCATION

1. Desired Location of Splitter(s) (check first/second choice)

	1st Choice	2nd Choice
a. CLEC/DLEC Site (rack/frame mounted)	<input type="checkbox"/>	<input type="checkbox"/>
b. Central Office Bay (rack mounted)	<input type="checkbox"/>	<input type="checkbox"/>
c. Central Office Frame (frame mounted)	<input type="checkbox"/>	<input type="checkbox"/>
2. Splitter Choice(s)
 - a. Will the Co-Provider order and deliver the Splitter(s), as well as the associated cabling for installation by U S WEST?
 Yes (DLEC Site splitter installation by U S WEST restricted to virtual collocation)
 - b. Does the Co-Provider want U S WEST to order the Splitter on the Co-Provider's behalf?
 Yes (DLEC Site splitter installation by U S WEST restricted to virtual collocation)
 - c. Splitter detail and quantities requested (fill in one or more)

	Manufacturer	Model #	Quantity	Frame	Rack
1st Choice	<input type="text"/>				
2nd Choice	<input type="text"/>				

3. Cable Information
 - a. Note: The following matrix shows the required cable runs from the ICDF to the DLEC Site by splitter type

	Data	Voice & Data
1). CLEC/DLEC Site Splitter	x	x
2). Central Office Bay Mounted Splitter	x	-
3). Central Office Frame Mounted Splitter	x	-
 - b. Use existing ICDF to DLEC/CLEC cable to the collocation site? (check if yes)
 - c. If using existing DLEC/CLEC cable, designate cable name(s) and pairs (from APOT form)

<input type="text"/>	Cable Name
<input type="text"/>	Cable Count
<input type="text"/>	Cable Type (e.g. 24-NL)
 - d. Specify splitter circuit cadence, e.g. skip every 25th pair, skip the last 4 of every 100 count, etc.
 - e. Do you require additional capacity between your collocation site and ICDF? (check if yes)
 - f. If additional capacity is required please fill in the following
 - 1). Cable size (standard is 100 pair, non-shielded, see note below if non-standard is required).
 - 2). Number of pairs required
 - 3). Cable type (e.g. 24-NL)
 - 4). Special Cable Requirements

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T and TCG Phoenix's Response to Qwest's "Compliance" Filing in Docket Nos. T-01051B-99-0068 and T-00000A-97-0238, were sent via overnight delivery this 15th day of December, 2000, to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and that a copy of the foregoing was sent via overnight delivery this 15th day of December, 2000 to the following:

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and a true and correct copy of the foregoing was sent via United States Mail, postage prepaid, on the 15th day of December, 2000 to the following:

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