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BEFORE THE ARIZONA CORPORATION COMMISSION

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JEFF HATCH-MILLER
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Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF DIECA COMMUNICATIONS DBA COVAD COMMUNICATIONS COMPANY, ESCHELON TELECOM OF ARIZONA, INC., MCLEODUSA TELECOMMUNICATIONS SERVICES, INC., MOUNTAIN TELECOMMUNICATIONS, INC., XO COMMUNICATIONS SERVICES, INC. AND QWEST CORPORATION REQUEST FOR COMMISSION PROCESS TO ADDRESS KEY UNE ISSUES ARISING FROM TRIENNIAL REVIEW REMAND ORDER, INCLUDING APPROVAL OF QWEST WIRE CENTER LISTS.

DOCKET NOS. T-03632A-06-0091
T-03406A-06-0091
T-03267A-06-0091
T-03432A-06-0091
T-04302A-06-0091
T-01051B-06-0091

QWEST CORPORATION'S MOTION FOR AN ORDER COMPELLING THE PRODUCTION OF CLEC-SPECIFIC WIRE CENTER DATA

Qwest Corporation ("Qwest") hereby requests that the Commission enter an order directing Qwest to produce certain data essential to this proceeding in a disaggregated form that will permit parties to match specific data with specific competitive local exchange carriers ("CLECs"). Qwest expects to produce these data with its testimony in this proceeding and potentially in response to discovery requests and, accordingly, seeks an order directing it to produce the data on a CLEC-specific basis both in testimony and in its response to discovery requests. Qwest seeks this order because CLEC-specific wire center data likely will be demanded by parties interested in this proceeding for the purposes of counting business line counts and fiber collocators in specific wire centers. Without an order compelling it to do so,

1 Qwest may not lawfully be able to produce disaggregated data that can be matched to individual
2 CLECs.

3 The primary purpose of this proceeding is for the Commission determine the quantities of
4 business lines and fiber collocators in Arizona wire centers so that carriers can implement the
5 Section 251(d)(2) impairment standards set forth in the FCC's Triennial Review Remand Order
6 ("TRRO") for high-capacity dedicated transport and loops.¹ Qwest anticipates that interested
7 parties, and the Commission, will desire to review the wire center data Qwest produces on a
8 CLEC-specific basis to permit determinations of the numbers of business access lines and fiber
9 collocations that each CLEC has in a particular wire center. By having this information specific
10 to each CLEC instead of in an aggregated form, the Commission and interested parties will be
11 able to conduct their own calculations of the total numbers of business lines and fiber collocators
12 reflected in Qwest's data. These "bottom up" calculations would not be possible with aggregated
13 data masking the identities of individual CLECs, and use of aggregated data therefore would
14 reduce the likelihood of the parties to this proceeding eventually agreeing upon the counts in
15 wire centers.

16 Data that disclose the business line counts and locations of fiber collocations for
17 individual CLECs may be protected under Section 222 of the Telecommunications Act of 1996
18 and pursuant to other federal and state privacy laws. Qwest can not produce these data absent an
19 order from the Commission compelling it to do so. Accordingly, to permit all interested parties
20 to conduct full and thorough analyses of wire center data in this proceeding, the Commission
21 should:

22 (1) Order Qwest to produce wire center data in a form that will permit interested parties
23
24

25 ¹ Order on Remand, *In the Matter of Review of Unbundled Access to Network Elements, Review*
26 *of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No.
01-338, WC Docket No. 04-313 (FCC rel. February 4, 2005).

1 to match the data with individual carriers;²

2 (2) Direct that the information will be produced under the "Confidential" designation of
3 the Protective Order that will govern this proceeding; and

4 (3) Confirm that the order will not prevent any party, including Qwest, from asserting
5 proper objections to discovery requests.

6

7 RESPECTFULLY SUBMITTED, this 28th day of February, 2006.

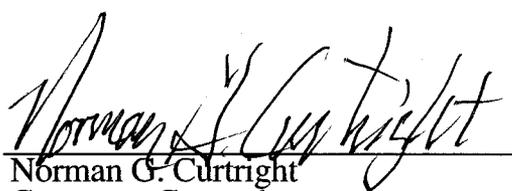
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QWEST CORPORATION

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² The Commission's order should explain that the information Qwest produces may include, for example, identification by CLEC or carrier of specific purchases and receipt of services from Qwest. In addition, the Commission should clarify that the order directing Qwest to produce CLEC-specific information applies in circumstances where a carrier is not specifically identified in the data but the data reflect such small volumes that parties with knowledge of the market could infer the identity of the carrier.

1 ORIGINAL and 13 copies hand-delivered
2 for filing this 28th day of February, 2006, to:

3 Docket Control
4 ARIZONA CORPORATION COMMISSION
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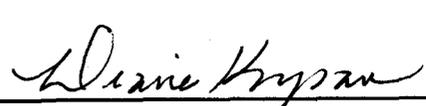
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