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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
RESPONSE TO JOINT CLECs'
APPLICATION**

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I. INTRODUCTION

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Qwest Corporation ("Qwest") hereby responds to the February 15, 2006 request by certain competitive local exchange carriers ("the Joint CLECs")¹ that the Commission open an investigation to order Qwest to provide underlying data subject to an appropriate protective order, to develop a Commission-approved initial list of non-impaired wire centers, pursuant to

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¹ The Joint CLECs that submitted the letter are Covad Communications Company, Eschelon Telecom, Inc., Integra Telecom, Inc., McLeodUSA Telecommunications Services, Inc., and XO Communications Services, Inc.

1 the FCC's *Triennial Review Remand Order* ("TRRO"),² after party review and discussion of that
2 data, and to implement a process of updating and approving the lists. The Commission has
3 recently docketed this request as set forth in the caption. Qwest agrees that this investigation is
4 necessary, and further submits that the primary purpose of the docket should be to establish the
5 number of business lines and fiber collocators in Arizona wire centers pursuant to the *TRRO*.

6 As described below, Qwest and the Joint CLECs are in concurrence that findings from
7 the Commission on these narrow issues are necessary for Qwest and CLECs to implement the
8 FCC's regulatory framework for unbundled dedicated transport and high-capacity loops set forth
9 in the TRRO. Qwest's request that the Commission take action on the issues described is
10 supported by the FCC's endorsement in the TRRO of an ongoing role for state commissions in
11 these matters that relate to the change of law provisions in interconnection agreements between
12 Qwest and CLECs and to Sections 251 and 252 of the Telecommunications Act of 1996 ("the
13 Act").³

14 Qwest respectfully requests that the Commission convene a procedural conference as
15 soon as possible to establish an expedited process and schedule for addressing these issues. In
16 the discussion that follows, Qwest explains the need for expedited resolution of these issues and
17 describes the type of binding, adjudicatory proceeding the Commission should conduct to ensure
18 that the regulatory framework established by the TRRO is implemented expeditiously and with
19 clarity.

20 21 II. BACKGROUND

22
23 On February 15, 2006, the Joint CLECs submitted a letter to the Commission requesting

24 ² Order on Remand, *In the Matter of Review of Unbundled Access to Network Elements, Review*
25 *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) ("TRRO").

26 ³ See, e.g., TRRO at ¶¶ 233, 234.

1 a proceeding for the purpose of determining the business line counts and numbers of collocators
2 in Arizona wire centers, explaining that these determinations are necessary to implement the
3 FCC's rulings in the TRRO relating to unbundled dedicated transport and high-capacity loops.
4 Qwest agrees that a proceeding for these and other related purposes is necessary. As described
5 below, however, Qwest differs from the CLECs in some respects concerning the nature of the
6 proceeding and the issues the Commission should address.

7
8 **A. *The FCC's Impairment Criteria for Dedicated Interoffice Transport and***
9 ***High-Capacity Loops.***

10 The concurrence of opinion between Qwest and the Joint CLECs that a proceeding is
11 necessary arises from the structural framework the FCC established in the TRRO for determining
12 whether high capacity dedicated transport and high-capacity loops meet the "impairment"
13 requirement for unbundled network elements ("UNEs") set forth in Section 251(d)(2) of the Act.
14 The primary significance of these impairment determinations is that they dictate whether high-
15 capacity transport and loops qualify as Section 251(c)(3) UNEs that Qwest must provide to
16 CLECs at rates based on the FCC's TELRIC ("total element long-run incremental cost") pricing
17 methodology or whether they are no longer within Section 251(c)(3) and are governed by the
18 non-TELRIC pricing standard in Sections 201 and 202 of the Communications Act of 1934.⁴

19 Under the TRRO framework, CLECs are deemed not to be impaired without access to
20 DS1 transport on routes connecting a pair of wire centers where both wire centers contain at least

21
22 ⁴ Under this standard, rates must not be unjust, unreasonable, or unreasonably discriminatory.
23 Responsibility for administering the Section 201-02 pricing standard rests with the FCC. *See,*
24 *e.g., Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, In the*
25 *Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange*
26 *Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of*
1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC
Dkt. Nos. 01-338, 96-98, 98-147, FCC 03-36 at 664 (FCC rel. Aug. 21, 2003) ("Triennial
Review Order" or "TRO"), vacated in part, remanded in part, U.S. Telecom Ass'n v. FCC, 359
F.3d 554 (D.C. Cir. 2004) ("USTA II").

1 four fiber-based collocators or at least 38,000 business access lines.⁵ For DS3 transport and dark
2 fiber transport, there is no impairment on routes connecting a pair of wire centers where both
3 wire centers contain at least three fiber-based collocators or at least 24,000 business lines.⁶

4 The impairment criteria for high-capacity loops also are based on a capacity-specific
5 approach that distinguishes between DS1 and DS3 capacity. For DS1 loops, CLECs are not
6 impaired in any building within the service area of a wire center containing 60,000 or more
7 business lines and four or more fiber-based collocators.⁷ CLECs are not impaired without access
8 to DS3 loops in any building within the service area of a wire center containing 38,000 or more
9 business lines and four or more fiber-based collocators.⁸

10

11 ***B. Qwest's Identification of Non-Impaired Wire Centers.***

12 To implement the FCC's impairment framework, Qwest undertook a detailed, multi-step
13 process designed to generate accurate wire center data and to permit CLECs to verify these data.
14 On February 18, 2005, Qwest responded to a request from the FCC's Wireline Competition
15 Bureau with a submission (attached hereto as Attachment A⁹) designating the wire centers in
16 Qwest's operating areas as Tier 1, Tier 2, or Tier 3 based on the criteria in the TRRO. This
17 submission also identified the wire centers in Qwest's operating areas that meet the non-
18 impairment thresholds for DS1 and DS3 loops.¹⁰

19 _____
20 ⁵ TRRO at ¶ 126. The wire centers meeting these criteria are referred to as "Tier 1 wire centers."
21 They are the wire centers "with the highest likelihood for actual and potential competitive
22 deployment, including wholesale opportunities." *Id.* at ¶ 111.

21 ⁶ TRRO at ¶¶ 118, 129, 133. The FCC defines wire centers with three or more fiber-based
22 collocators or 24,000 or more business lines as "Tier 2 wire centers." *Id.* at ¶ 118. According to
23 the FCC, the presence of three or more fiber-based collocators "establishes that multiple carriers
24 have overcome the costs of deployment in a wire center, signifying that substantial revenues
25 exist in the wire center to justify deployment." *Id.*

24 ⁷ TRRO at ¶ 178.

25 ⁸ TRRO at ¶ 174.

25 ⁹ Because the list of wire centers that was attached to the original letter is quite voluminous and
26 is not necessary to this response, Qwest is not including that list with Attachment A.

26 ¹⁰ Qwest based the counts of switched business access lines on its most recent ARMIS Report

1 After providing this information to the FCC, Qwest attempted to develop a cooperative
2 process with the CLECs and state commissions to ensure the accuracy of its wire center data.
3 Under the protection of a nondisclosure agreement, Qwest provided CLECs and state
4 commission staffs access to the confidential data underlying its February 18 submission. These
5 data included, on a wire center-specific basis, numbers of switched business lines, UNE-P lines,
6 UNE loops, and fiber collocators. Qwest also provided to each carrier upon whose data it relied
7 in the February 18 submission a list of the wire centers where, according to Qwest's records and
8 investigation, the carrier has fiber-based collocation. These carriers were given the opportunity
9 to review and, if appropriate, contest the accuracy of Qwest's data.

10 As a further step toward verification, Qwest conducted an additional internal review of
11 the collocation and line count data used for its February 18 submission. Based on this additional
12 review, which included another comprehensive evaluation of collocation arrangements in
13 Qwest's wire centers, Qwest refined its list of wire centers. In another submission to the FCC on
14 July 8, 2005 (attached hereto as "Attachment B"¹¹), Qwest provided a revised list of wire centers.
15 Qwest thereafter provided a third submission to the FCC on August 18, 2005 (attached hereto as
16 "Attachment C"¹²) that made minor corrections to the wire center data.

17 Despite these efforts, some CLECs have insisted upon further review and verification of
18 wire center data by state commissions. An expedited proceeding to determine and establish line
19 counts and numbers of collocators in wire centers is therefore necessary to avoid delay in
20

21 43-08 data, which were current as of December 2003. To develop an estimate of the business
22 UNE-P lines in each wire center, Qwest relied on the percentage of white page listings for each
23 wire center that are business, not residential. Qwest determined the number of collocation
arrangements that meet the TRRO's definition of "fiber-based collocator" based on billing data
that were current as of February 2005 and physical inspections of wire centers.

24 ¹¹ Qwest is not including the list of wire centers that was provided with the original submission
because that list also is voluminous and is not necessary to this response.

25 ¹² Qwest is providing with Attachment C a list of the Arizona wire centers that were attached to
26 the original August 18, 2005, submission, but, for reasons of economy, is not including the wire
centers that were listed for other states.

1 implementing the TRRO's regulatory framework. The FCC clearly expected that by this
2 anniversary date, CLECs would have transitioned from dedicated transport and high-capacity
3 loop UNEs to alternate arrangements.¹³

4 5 III. DISCUSSION

6 7 A. *The Commission Should Conduct an Expedited Adjudicatory Proceeding.*

8 The Joint CLECs' letter to the Commission confirms that Qwest and the Joint CLECs
9 concur the Commission should conduct an expedited proceeding to review and establish wire
10 center line counts and numbers of fiber collocators per wire center. However, it appears there
11 may be potentially significant differences between Qwest and the CLECs concerning the nature
12 of this proceeding. In the discussion that follows, Qwest describes the framework the
13 Commission should adopt for the proceeding to ensure that all necessary issues are resolved
14 expeditiously and with the certainty required for Qwest and the CLECs to implement the TRRO
15 as the FCC intended.

16 1. *The proceeding must be binding on Qwest and all CLECs in the state.* It is not
17 apparent from the Joint CLECs' submission whether they are proposing a proceeding that would
18 be binding on Qwest and all CLECs in the state. There should be no question, however, that the
19 proceeding will be binding on every registered local exchange carrier in the state, including those
20 that receive notice of the proceeding but choose not to participate. Unless the Commission
21 resolves the wire center counts and related issues through rulings that are binding,
22 implementation of the TRRO will be delayed and time-consuming, costly disputes will be
23 inevitable. Moreover, it would be a highly inefficient use of the Commission's and the parties'
24 resources to conduct a non-binding proceeding with rulings that any dissatisfied party could elect
25 to ignore.

26 ¹³ TRRO at ¶¶ 142, 195.

1 Thus, for example, in submitting orders for high-capacity transport and loops, all carriers
2 will be required to review and adhere to the list of non-impaired wire centers that results from
3 the Commission's determination of the business line counts and numbers of collocators in
4 individual wire centers. Further, if a CLEC submits an order for UNE transport or a high-
5 capacity loop in a wire center that is on the list of non-impaired wire centers resulting from this
6 proceeding, the Commission should confirm that Qwest is permitted to reject that legally
7 improper order.

8 In addition, to maximize the efficiency of the proceeding and to eliminate future disputes,
9 the Commission should provide notice of the proceeding to all local exchange carriers registered
10 in the state, not just the carriers with which Qwest has interconnection agreements. The notice
11 should state expressly that the proceeding is binding on all registered local exchange carriers.

12 2. *The proceeding should be expedited.* To avoid any further delays in
13 implementing the TRRO and to minimize or eliminate the possibility of disputes upon expiration
14 of the FCC's transitional pricing scheme for high-capacity transport and loops, the Commission
15 should invoke any available procedures for expedited resolution of the issues described in this
16 response. As part of this expedited approach, the Commission should convene a procedural
17 conference and schedule an adjudicatory hearing as soon as possible.

18 3. *The Commission should conduct an adjudicatory proceeding.* Because the issues
19 involving line counts and fiber collocators are factual in nature, the Commission should conduct
20 an adjudicatory proceeding. Qwest proposes a proceeding under which it would present an
21 opening round of testimony containing wire center data for line counts and fiber collocators, and
22 the CLECs would present response testimony indicating if they have a good faith basis for
23 contesting Qwest's data. If the CLECs have such a good faith basis, they would offer data of
24 their own or other evidence responding to Qwest's data. Qwest would submit reply testimony
25 addressing any CLECs challenges to Qwest's data. Through this process, Qwest expects that the
26 parties could significantly limit any disagreements concerning the wire center data. More

1 important, an adjudicatory proceeding will result in a definitive determination by the
2 Commission concerning the business line counts and numbers of fiber collocators in wire centers
3 and will thereby give Qwest and the CLECs alike the certainty they need going forward.

4 4. *The Commission should adopt an appropriate protective order.* Qwest agrees
5 with the Joint CLECs that because this proceeding will involve large amounts of confidential
6 information, the Commission should adopt an appropriate protective order. In particular,
7 confidentiality protection is needed for the types of CLEC-specific data described below. Qwest
8 suggests that prior to or during the initial procedural conference, all interested parties should
9 discuss and attempt to agree upon an appropriate protective order. Protective orders that the
10 Commission has adopted in prior proceedings, such as the protective orders from the Triennial
11 Review Order proceedings and the wholesale cost docket, provide a good foundation for these
12 discussions.

13 5. *The Commission Should Issue an Order Compelling Qwest to Produce CLEC-*
14 *Specific Data to Interested Parties.* To facilitate review of the relevant wire center data, it will
15 be necessary for Qwest to provide wire center data, including data specific to individual CLECs,
16 to all interested parties. Because these data may fall within the protections afforded under
17 Section 222 of the Act and CLECs deem the data confidential, Qwest is unable to produce them
18 without an order from the Commission compelling production with appropriate confidentiality
19 protection. It is particularly important that the order the Commission issues authorize Qwest to
20 produce wire center data that is disaggregated so that individual pieces of data can be identified
21 and associated with particular carriers. For example, a carrier reviewing data to determine the
22 number of fiber collocators in a wire center very likely will want to know not just the total
23 number of collocators, but the specific CLECs that are collocated.

24 Accordingly, following adoption of an appropriate protective order, the Commission
25 should issue an order compelling Qwest to produce CLEC-specific wire center data to all
26 interested parties. Qwest is filing separately a motion seeking such an order.

1 Relatedly, if the Joint CLECs are requesting that the Commission designate as
2 "Commission-ordered" the "information requests" included in their February 15 letter as
3 "Attachment B," the Commission should reject that request. First, the more efficient and
4 procedurally proper course is for Qwest to provide wire center data in the first instance through
5 its opening round of testimony, as described above. The CLECs should analyze those data and
6 then serve information requests if they have questions or desire additional data. Through this
7 approach, the number of information requests and the potential for discovery disputes will be
8 reduced. Second, a request for the Commission to treat the CLECs' information requests as
9 "ordered" by the Commission would amount to an improper attempt to abrogate Qwest's
10 procedural right to object to information requests that are irrelevant, overly broad, or otherwise
11 improper. On their face, it is clear that some of the information requests likely would not satisfy
12 even a broad determination of relevancy and would impose undue burden on Qwest. For
13 example, Information Request No. 3 includes 16 sub-parts, some of which plainly seek
14 information that is not needed for line counts or fiber collocator determinations. Qwest has a
15 right to object to requests of this type, and the Joint CLECs should not be permitted to
16 circumvent that right by having their proposed information requests deemed ordered by the
17 Commission at the outset of this proceeding.

18
19 ***B. In Addition to Making Determinations Relating to Wire Center Data, the***
20 ***Commission Should Resolve Other Issues That Will be Directly Affected by***
21 ***Those Determinations.***

22 The Commission's resolution of the wire center data issues is essentially a counting
23 exercise, with the Commission being asked to review data and determine the number of business
24 lines and fiber collocators in wire centers. Qwest is not asking the Commission to make any
25 impairment determinations relating to high capacity transport and loops, as the D.C. Circuit's
26

1 decision in *USTA II* establishes that the FCC alone has authority to make those determinations.¹⁴
2 However, in addition to changing the rates that will govern CLEC purchases of high capacity
3 transport and loops, a determination that there is no impairment in a particular wire center where
4 a CLEC is purchasing one of these network elements will trigger at least two other issues relating
5 to the conversion of the element from a Section 251 UNE to a non-251 element. The
6 Commission should address these issues as part of this proceeding.

7 First, the Commission should confirm Qwest's right to assess a nonrecurring charge at
8 applicable tariffed rates if Qwest performs a conversion after a CLEC fails to perform that work.
9 Qwest incurs costs in converting UNE transport or high capacity loops to alternative facilities or
10 arrangements, and, accordingly, it should be permitted to assess an appropriate tariffed charge.
11 Multiple CLECs have implicitly recognized Qwest's right to assess this charge, as evidenced by
12 their decisions to enter into amendments to their interconnection agreements containing the
13 charge. Qwest is not asking the Commission to address or otherwise rule upon the amount of a
14 nonrecurring conversion charge; it is seeking only to have the Commission confirm the right to
15 assess such a charge.

16 Second, as the Joint CLECs have requested in its submission, the Commission should
17 establish a process for future updates of Qwest's list of non-impaired wire centers. Contrary to
18 the CLECs' proposal, this process should be streamlined and efficient and should not require a
19 new docket or a prolonged proceeding each time there is a change to the list. The Joint CLECs'
20 proposal for a time-consuming proceeding each time a wire center is to be added to the list of
21 non-impaired wire centers would only delay implementation of the TRRO framework, contrary
22 to the FCC's directive that carriers implement that framework expeditiously and in a self-
23 executing manner, and would result in potentially extended periods during which CLECs would
24 improperly be paying UNE-based TELRIC rates for high capacity transport and loops in wire
25 centers where there is no impairment.

26 ¹⁴ See *USTA II*, 359 F.3d at 568.

1 Instead of the potentially unwieldy process proposed by the Joint CLECs, the
2 Commission should require Qwest to provide notice to the CLECs of additions to the list of non-
3 impaired wire centers and, if the CLECs seek additional information, should direct Qwest to
4 provide the CLECs with the methodology by which Qwest determined that a wire center meets
5 the TRRO's non-impairment criteria relating to numbers of business lines and fiber collocators.
6 The CLECs should thereafter be given 90 days to transition DS1 and DS3 UNEs to an alternative
7 service.

8

9

IV. CONCLUSION

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11 For the reasons stated, Qwest respectfully requests that the Commission open an
12 investigation and conduct an adjudicatory proceeding to address the issues described herein on
13 an expedited basis.

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DATED this 28th day of February, 2006.

15

QWEST CORPORATION

16

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By: 

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ATTACHMENT A



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February 18, 2005

FILED VIA ECFS

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**Re: Unbundled Access to Network Elements, WC Docket No. 04-313;
Review of Section 251 Unbundling Obligations for Incumbent Local
Exchange Carriers, CC Docket No. 01-338**

Dear Mr. Carlisle:

This submission responds to your letter of February 4, 2005, asking Qwest to provide a list identifying by Common Language Location Identifier (CLLI) code which wire centers in Qwest's operating areas satisfy the Tier 1, Tier 2 and Tier 3 criteria for dedicated transport, and identifying by CLLI code the wire centers that satisfy the nonimpairment thresholds for DS1 and DS3 loops in the *Triennial Review Remand Order*.¹

Enclosed are two attachments. Attachment A identifies which of Qwest's approximately 1,200 wire centers satisfy the Tier 1, Tier 2 and Tier 3 criteria adopted in the *Triennial Review Remand Order*. Attachment B lists the wire centers that satisfy the nonimpairment standards for DS1 and DS3 loops in the *Order*. These classifications were made based on the definitions of "business line" and "fiber-based collocater" in the *Order*.

Business Lines. Consistent with the definition in the *Order*,² Qwest determined the number of "business lines" in each wire center by computing the sum of the following:

¹ *In the Matter of Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, *Order on Remand* ("Triennial Review Remand Order" or "Order").

² 47 C.F.R. § 51.5, as attached (Appendix B) to the *Order*, to be published in the Federal Register and codified in the C.F.R.

- Qwest's switched business access lines (*i.e.*, single, multiline and Public Access (Coin) Lines) in the wire center, based on Qwest's most recent ARMIS Report 43-08 data, which is current as of December 2003 and was filed with the Commission in April 2004. This figure includes ISDN and other digital access lines. Each 64 kbps-equivalent has been counted as one line.
- UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements (*e.g.*, EELs and business UNE-P lines). Each 64 kbps-equivalent has been counted as one line. Thus, for example, each DS1 loop has been counted as 24 business lines. Qwest does not track UNE-P separately by residential and business. Qwest derived an estimate of business UNE-P lines in each wire center based on the percentage of white page listings for that wire center that are business, rather than residential. All of these data are current as of December 2003.

Fiber-Based Collocators. Qwest also verified the number of collocation arrangements that satisfy the *Order's* definition of "fiber-based collocator," for each wire center that would qualify for unbundling relief for high capacity loops or transport, based on the nonimpairment standards adopted in the *Order*. Qwest used its most current billing data, as of February 2005, and physical inspections to identify collocation arrangements that satisfy the definition in the *Order*. To the best of its knowledge, Qwest has counted each collocator and any of its affiliates as only one collocator for purposes of this analysis.

To the extent this submission, or similar submissions by other incumbents, raise any questions or disputes, those issues should be addressed by the Commission, rather than state commissions. The Commission clearly is in the best position to address these issues in an expeditious manner. Over the past several years, the Commission has dealt with very similar issues in evaluating numerous petitions for pricing flexibility filed by price cap LECs. In that context, the petitioning price cap LEC must provide individual notification to each CLEC upon which the price cap LEC's petition relies. The notification identifies the information that the price cap LEC has included in its petition, such as the wire centers in which the CLEC has fiber-based collocation. The CLECs then have 15 days to file comments or objections to the petition.³ The Commission's experience in the pricing flexibility context demonstrates that it is well equipped to resolve any disputes that may arise regarding the accuracy of the ILEC's fiber-based collocation and other data. Adoption of a similar procedure here would ensure that these factual disputes are resolved quickly and efficiently.

The Commission is also best suited to address any questions of interpretation of the *Order* that may arise in determining which wire centers and routes are affected by the *Order*. In the pricing flexibility context, a number of similar questions arose when the first several pricing

³ See 47 C.F.R. § 1.774(c), (e).

Mr. Jeffrey J. Carlisle
February 18, 2005

Page 3 of 3

flexibility petitions were filed. To the extent such issues arise here, the Commission should resolve those questions to ensure a consistent application of the *Order*.

Please let us know if you have further questions about this matter.

Sincerely,

/s/ Gary R. Lytle

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July 8, 2005

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**Re: Unbundled Access to Network Elements, WC Docket No. 04-313;
Review of Section 251 Unbundling Obligations for Incumbent Local
Exchange Carriers, CC Docket No. 01-338**

Dear Mr. Navin:

On February 18, 2005, in response to a request by the Wireline Competition Bureau, Qwest submitted lists identifying by Common Language Location Identifier ("CLLI") code the wire centers in Qwest's operating area satisfying the nonimpairment thresholds for high capacity transport and loop facilities established in the *Triennial Review Remand Order* ("TRRO").¹ Since that time, Qwest has undertaken a detailed verification process to ensure the accuracy of these lists. As a result of this review, Qwest hereby submits revised lists of the wire centers in Qwest's region meeting the TRRO's nonimpairment thresholds for high capacity transport and loop facilities.

Enclosed are two attachments. Attachment A identifies which of Qwest's approximately 1200 wire centers satisfy the Tier 1, Tier 2, and Tier 3 criteria adopted in the TRRO. As shown in Attachment A, there are 46 and 30 Qwest wire centers that satisfy the Tier 1 and Tier 2 criteria, respectively. Attachment B lists the Qwest wire centers that satisfy the nonimpairment standards for DS1 and DS3 loops in the TRRO. As reflected in Attachment B, Qwest has been relieved of unbundling requirements for DS1 and DS3 loops in 4 and 7 Qwest wire centers, respectively. The lists in Attachments A and B are also being posted on Qwest's website.²

¹ Letter from Gary R. Lytle, Senior Vice President-Federal Relations, Qwest, to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Feb. 18, 2005).

² Qwest has not rejected any orders for unbundled transport or unbundled loops in the wire centers identified in the lists of nonimpaired wire centers submitted on February 18. Competitive local exchange carriers ("CLECs") can continue to order high capacity transport and loops in all Qwest wire centers until their interconnection agreements with Qwest have been amended to reflect the TRRO.

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July 8, 2005

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On March 29, 2005, Qwest initiated a three-step process to ensure the accuracy of its wire center data. *First*, Qwest provided access for CLECs and state public service commission staff to the confidential data underlying the February 18 lists of Qwest wire centers meeting the nonimpairment thresholds in the *TRRO*. The confidential data were made available pursuant to the terms of the applicable protective order and included the following information for each wire center identified in one or both of the February 18 lists:

- ARMIS 43-08 business line information
- UNE-P lines
- UNE-loop data
- fiber-based collocater information

Second, Qwest provided to each party upon which it relied for unbundling relief in the February 18 filing a list of the relevant wire centers where that party has fiber-based collocation, according to Qwest's records. Those parties then had the opportunity to contest the accuracy of that information. This process is similar to that employed by the Commission in the pricing flexibility dockets to verify the accuracy of the collocation information relied on in those proceedings. In light of the highly sensitive nature of the collocation information, Qwest allowed each collocater access only to its own collocation information in the relevant wire centers.

Third, Qwest conducted a further internal check of the collocation and line count data used to generate the February 18 wire center lists, including a comprehensive review of the collocation arrangements in Qwest's wire centers.

A number of parties took advantage of this process to gain further information about the data underlying Qwest's lists of nonimpaired wire centers, or to question the validity of Qwest's line count or collocation data. Qwest also answered numerous detailed questions from CLECs about the methodology used to identify nonimpaired wire centers.

Through this verification process, Qwest identified a number of data inaccuracies in the lists of nonimpaired wire centers submitted on February 18. *First*, Qwest discovered that, in some cases, it had counted a fiber-based collocater twice because the Qwest records used for the February 18 filing did not reflect the affiliation of that collocater with another fiber-based collocater in that wire center. In several cases, CLECs notified Qwest of these affiliations in response to the collocation information provided by Qwest in the March 29 letters noted above. To address any lingering concerns of double counting, Qwest checked other data sources to determine potential affiliations and then sent letters to the affected carriers requesting verification of those or any other affiliations. *Second*, Qwest found that, in a small number of cases, collocation arrangements using dark fiber transport leased from Qwest had been counted as fiber-based collocations, due to inaccuracies in service orders. *Third*, Qwest discovered that certain collocation arrangements counted in the February 18 filing had been decommissioned or

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July 8, 2005

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otherwise were not operational. *Fourth*, Qwest identified additional fiber-based collocators that it had not counted as fiber-based collocators for purposes of the February filing. Due to the compressed timeframe for the inspections in February, Qwest ignored numerous collocation arrangements that could not readily be verified as fiber-based collocators at that time. Upon further investigation in April and May, Qwest was able to confirm that some of these arrangements did in fact qualify as fiber-based collocation arrangements.³

Qwest has corrected all inaccuracies in its data that were discovered through the verification process described above, and, as necessary, has revised its count of wire centers meeting the nonimpairment thresholds for high capacity transport and loops in Attachments A and B.

Please let me know if you have any questions about this matter.

Sincerely,

/s/ Cronan O'Connell

Attachments

cc: Julie Veach (via e-mail at Julie.Veach@fcc.gov)
Jeremy Miller (via e-mail at Jeremy.Miller@fcc.gov)
Ian Dillner (via e-mail at Ian.Dillner@fcc.gov)

³ Qwest is in the process of notifying the owners of these collocation arrangements that Qwest is now relying on these collocation arrangements for unbundling relief, so that the collocators have an opportunity to verify the accuracy of this collocation data. If this further verification results in any changes in the number of fiber-based collocators in particular wire centers, Qwest will revise its list of nonimpaired wire centers as necessary.

ATTACHMENT C



Qwest
607 14th Street NW, Suite 950
Washington, DC 20005
Phone 202.429.3121
Fax 202.293.0561

Cronan O'Connell
Vice President-Federal Regulatory

August 18, 2005

EX PARTE

FILING VIA ECFS

Thomas Navin
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Unbundled Access to Network Elements, WC Docket No. 04-313; Review of Section 251 Unbundling Obligations for Incumbent Local Exchange Carriers, CC Docket No. 01-338

Dear Mr. Navin:

On February 18, 2005, in response to a request by the Wireline Competition Bureau, Qwest submitted lists identifying by Common Language Location Identifier ("CLLI") code the wire centers in Qwest's operating area satisfying the nonimpairment thresholds for high capacity transport and loop facilities established in the *Triennial Review Remand Order* ("TRRO").¹ On July 8, 2005, after completing a detailed verification process, Qwest filed revised lists of the wire centers in Qwest's region meeting the TRRO's nonimpairment thresholds for high capacity transport and loop facilities.²

It has recently come to our attention that one of the wire centers listed in Attachment B "Triennial Review Remand Order, Qwest Wire Centers that Satisfy the Nonimpairment Standards for DS1 and DS3 Loops, Sorted by Loop Type" was correctly identified by "CLLI8", but the "Wire Center Name" for the wire center was incorrect. The affected wire center CLLI8 is "DNVRCOMA", which was identified as "Colorado Springs Main" on the July 8th filing. The correct name for the wire center is "Denver Main." We have verified that all data provided is correctly associated with the CLLI code for Denver Main (DNVRCOMA). As a result, we are submitting a revised list of wire centers in Qwest's operating area that satisfy the nonimpairment

¹ Letter from Gary R. Lytle, Senior Vice President-Federal Relations, Qwest, to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Feb. 18, 2005).

² Letter from Cronan O'Connell, Vice President-Federal Regulatory, Qwest, to Thomas Navin, Chief, Wireline Competition Bureau, FCC (filed July 8, 2005).

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thresholds established in the *TRRO*, correcting only the wire center name for this one wire center. Although there are no changes to Attachment A, we are submitting the entire filing for ease of use by interested parties.

Please let me know if you have any questions about this matter.

Sincerely,

/s/Cronan O'Connell

Attachments

cc: Julie Veach (via e-mail at Julie.Veach@fcc.gov)
Jeremy Miller (via e-mail at Jeremy.Miller@fcc.gov)
Ian Dillner (via e-mail at Ian.Dillner@fcc.gov)

TRIENNIAL REVIEW REMAND ORDER
QWEST WIRE CENTER CLASSIFICATION FOR DEDICATED TRANSPORT
Sorted by Wire Center Classification

State	Wire Center Name	CLL#	Wire Center Classification
AZ	PHOENIX EAST	PHNXAZE	Tier 1
AZ	PHOENIX MAIN	PHNXAZMA	Tier 1
AZ	PHOENIX NORTHEAST	PHNXAZNE	Tier 1
AZ	PHOENIX NORTH	PHNXAZNO	Tier 1
AZ	THUNDERBIRD	SCDLAZTH	Tier 1
AZ	TEMPE	TEMPAZMA	Tier 1
AZ	MCCLINTOCK	TEMPAZMC	Tier 1
CO	BOULDER	BLDRCOMA	Tier 1
CO	COLO SPRINGS MAIN	CLSPCOMA	Tier 1
CO	PIKEVIEW	CLSPCOPV	Tier 1
CO	CAPITOL HILL	DNVRCOCH	Tier 1
CO	CURTIS PARK	DNVRCOCP	Tier 1
CO	DRY CREEK	DNVRCODC	Tier 1
CO	DENVER EAST	DNVRCOEA	Tier 1
CO	DENVER MAIN	DNVRCOMA	Tier 1
CO	DENVER SOUTHEAST	DNVRCOSE	Tier 1
CO	SULLIVAN	DNVRCOSL	Tier 1
CO	NORTHGLENN	NGLNCOMA	Tier 1
IA	DES MOINES DOWNTOWN	DESMIADT	Tier 1
ID	BOISE MAIN	BOISIDMA	Tier 1
MN	NORMANDALE	BLTNMNN	Tier 1
MN	ORCHARD	GLVYMNR	Tier 1
MN	MPLS DOWNTOWN	MPLSMNDT	Tier 1
MN	MARKET	STPLMNMK	Tier 1
NE	OMAHA DOUGLAS	OMAHNENW	Tier 1
NM	ALBU MAIN	ALBQNMMA	Tier 1
OR	EUGENE 10TH AVE	EUGNOR53	Tier 1
OR	MEDFORD	MDFDOR33	Tier 1
OR	PTLD BELMONT	PTLDOR13	Tier 1
OR	PTLD CAPITOL	PTLDOR69	Tier 1
OR	SALEM STATE(MAIN)	SALMOR58	Tier 1
UT	MURRAY	MRRYUTMA	Tier 1
UT	OGDEN MAIN	OGDUTMA	Tier 1
UT	PROVO	PROVUTMA	Tier 1
UT	SLKC MAIN	SLKCUTMA	Tier 1
UT	SLKC SOUTH	SLKCUTSO	Tier 1
UT	SLKC WEST	SLKCUTWE	Tier 1
WA	BELLEVUE SHERWOOD	BLLVWASH	Tier 1
WA	KENT O BRIEN	KENTWAOB	Tier 1
WA	OLYMPIA WHITEHALL	OLYMWAO2	Tier 1
WA	SPOKANE RIVERSIDE	SPKNWAO1	Tier 1
WA	SEATTLE EAST	STTLWA03	Tier 1
WA	SEATTLE ATWATER	STTLWA05	Tier 1
WA	SEATTLE MAIN	STTLWA06	Tier 1
WA	SEATTLE CAMPUS	STTLWACA	Tier 1
WA	SEATTLE ELLIOTT	STTLWAEI	Tier 1
AZ	MESA	MESAAZMA	Tier 2
AZ	SCOTTSDALE MAIN	SCDLAZMA	Tier 2
AZ	TUCSON MAIN	TCSNAZMA	Tier 2
CO	ARVADA	ARVDCOMA	Tier 2
CO	AURORA	AURRCOMA	Tier 2
CO	DENVER SOUTH	DNVRCOSO	Tier 2
CO	ABERDEEN	ENWDCOAB	Tier 2
CO	LAKWOOD	LKWDCOMA	Tier 2
IA	CEDAR RAPIDS DOWNTOWN	CDRRIADT	Tier 2
ID	BOISE WEST	BOISIDWE	Tier 2
MN	SOUTH	BLTNMNSO	Tier 2
MN	CRYSTAL	CRYSMNCR	Tier 2
MN	EAGAN-LEXINGTON	EAGNMNLB	Tier 2
MN	EDEN PRAIRIE	EDPRMNEP	Tier 2
MN	MPLS 7TH AVE	MPLSMN07	Tier 2
MN	MAPLEWOOD	MPWDMNMA	Tier 2
MN	OWATONNA	OWTNMNOW	Tier 2
MN	ROCHESTER	ROCHMNRO	Tier 2
MN	ST CLOUD	STCDMNTO	Tier 2
ND	FARGO-MOORHEAD	FARGNDBC	Tier 2
NE	OMAHA 84TH ST	OMAHNE84	Tier 2
NE	OMAHA 90TH ST	OMAHNE90	Tier 2
NM	SAN MATEO	ALBQNMMS	Tier 2
OR	BEND	BENDOR24	Tier 2

TRIENNIAL REVIEW REMAND ORDER
QWEST WIRE CENTER CLASSIFICATION FOR DEDICATED TRANSPORT
 Sorted by Wire Center Classification

<i>State</i>	<i>Wire Center Name</i>	<i>CLLIS</i>	<i>Wire Center Classification</i>
OR	PTLD ALPINE	PTLDOR11	Tier 2
SD	SIOUX FALLS MAIN	SXFLSDCO	Tier 2
WA	BELLEVUE GLENCOURT	BLLVWAGL	Tier 2
WA	SEATTLE CHERRY	STTLWACH	Tier 2
WA	SEATTLE DUMWAMISH	STTLWADU	Tier 2
WA	TACOMA FAWCETT	TACMWafa	Tier 2
AZ	SUNRISE	AGFIAZSR	Tier 3
AZ	ASHFORK	ASFKAZMA	Tier 3
AZ	BUCKEYE	BCKYAZMA	Tier 3
AZ	BISBEE	BISBAZMA	Tier 3
AZ	BLACK CANYON	BLCNAZMA	Tier 3
AZ	BENSON	BNSNAZMA	Tier 3
AZ	ST DAVID	BNSNAZSD	Tier 3
AZ	BEARDSLEY	BRDSAZMA	Tier 3
AZ	CHANDLER MAIN	CHNDAZMA	Tier 3
AZ	CHANDLER SOUTH	CHNDAZSO	Tier 3
AZ	CHANDLER WEST	CHNDAZWE	Tier 3
AZ	CHINO VALLEY	CHVYAZMA	Tier 3
AZ	COOLIDGE	CLDGAZMA	Tier 3
AZ	CAMP VERDE	CMVRAZMA	Tier 3
AZ	CIRCLE CITY	CRCYAZNM	Tier 3
AZ	CORONADO	CRNDAZMA	Tier 3
AZ	CASA GRANDE	CSGRAZMA	Tier 3
AZ	COTTONWOOD MAIN	CTWDAZMA	Tier 3
AZ	COTTONWOOD SOUTH	CTWDAZSO	Tier 3
AZ	CAVE CREEK	CVCKAZMA	Tier 3
AZ	DUDLEYVILLE	DDVLAZNM	Tier 3
AZ	DOUGLAS	DGLSAZMA	Tier 3
AZ	DEER VALLEY NORTH	DRVYAZNO	Tier 3
AZ	ELOY	ELOYAZ01	Tier 3
AZ	FLAGSTAFF EAST	FLGSAZEA	Tier 3
AZ	FLAGSTAFF MAIN	FLGSAZMA	Tier 3
AZ	FLAGSTAFF SOUTH	FLGSAZSO	Tier 3
AZ	FLORENCE	FLRNAZMA	Tier 3
AZ	FT MCDOWELL	FTMDAZMA	Tier 3
AZ	RIO VERDE	FTMDAZNO	Tier 3
AZ	COLDWATER	GDYRAZCW	Tier 3
AZ	GILA BEND	GLBNAZMA	Tier 3
AZ	GLENDALE	GLDLAZMA	Tier 3
AZ	GLOBE	GLORAZMA	Tier 3
AZ	GREEN VALLEY	GNVYAZMA	Tier 3
AZ	GRAND CANYON	GRCNAZMA	Tier 3
AZ	HIGLEY	HGLYAZMA	Tier 3
AZ	QUEEN CREEK	HGLYAZQC	Tier 3
AZ	HUMBOLDT	HMBLAZMA	Tier 3
AZ	HAYDEN	HYDNAZMA	Tier 3
AZ	JOSEPH CITY	JSCYAZMA	Tier 3
AZ	KEARNY	KRNYAZMA	Tier 3
AZ	LITCHFIELD PARK	LTPKAZMA	Tier 3
AZ	MARANA	MARNAZMA	Tier 3
AZ	GILBERT	MESAAZGI	Tier 3
AZ	MIAMI	MIAMAZMA	Tier 3
AZ	MAMMOTH	MMTHAZMA	Tier 3
AZ	MARICOPA	MRCPAZMA	Tier 3
AZ	MUNDS PARK	MSPKAZMA	Tier 3
AZ	NOGALES MAIN	NGLSAZMA	Tier 3
AZ	NOGALES MIDWAY	NGLSAZMW	Tier 3
AZ	NEW RIVER	NWRVAZMA	Tier 3
AZ	ORACLE	ORCLAZMA	Tier 3
AZ	PAGE	PAGEAZMA	Tier 3
AZ	FOOTHILLS	PHNXAZ81	Tier 3
AZ	BETHANY WEST	PHNXAZBW	Tier 3
AZ	CACTUS	PHNXAZCA	Tier 3
AZ	GREENWAY	PHNXAZGR	Tier 3
AZ	LAVEEN	PHNXAZLV	Tier 3
AZ	MID RIVERS	PHNXAZMR	Tier 3
AZ	MARYVALE	PHNXAZMY	Tier 3
AZ	PHOENIX NORTHWEST	PHNXAZNW	Tier 3
AZ	PECOS	PHNXAZPP	Tier 3
AZ	PEORIA	PHNXAZPR	Tier 3

TRIENNIAL REVIEW REMAND ORDER
QWEST WIRE CENTER CLASSIFICATION FOR DEDICATED TRANSPORT
Sorted by Wire Center Classification

State	Wire Center Name	CLLID	Wire Center Classification
AZ	PHOENIX SOUTHEAST	PHNXAZSE	Tier 3
AZ	PHOENIX SOUTH	PHNXAZSO	Tier 3
AZ	SUNNYSLOPE	PHNXAZSY	Tier 3
AZ	PHOENIX WEST	PHNXAZWE	Tier 3
AZ	PIMA	PIMAAZMA	Tier 3
AZ	PINE	PINEAZMA	Tier 3
AZ	PALOMINAS	PLMNAZMA	Tier 3
AZ	PRESCOTT EAST	PRSCAZEA	Tier 3
AZ	PRESCOTT MAIN	PRSCAZMA	Tier 3
AZ	PINNACLE PEAK	PRVYAZPP	Tier 3
AZ	ELGIN	PTGNAZEL	Tier 3
AZ	PATAGONIA	PTGNAZMA	Tier 3
AZ	PAYSON	PYSNAZMA	Tier 3
AZ	SHEA	SCDLAZSH	Tier 3
AZ	SEDONA MAIN	SEDNAZMA	Tier 3
AZ	SEDONA SOUTH	SEDNAZSO	Tier 3
AZ	SAFFORD	SFFRAZMA	Tier 3
AZ	SOMERTON	SMTNAZMA	Tier 3
AZ	SAN MANUEL	SNMNAZMA	Tier 3
AZ	SUPERIOR	SPRAZMA	Tier 3
AZ	SUPER EAST	SPRSAZEA	Tier 3
AZ	SUPER MAIN	SPRSAZMA	Tier 3
AZ	SUPER WEST	SPRSAZWE	Tier 3
AZ	SIERRA VISTA MAIN	SRVSAZMA	Tier 3
AZ	SIERRA VISTA NORTH	SRVSAZNO	Tier 3
AZ	SIERRA VISTA SOUTH	SRVSAZSO	Tier 3
AZ	STANFIELD	STFDAZMA	Tier 3
AZ	CATALINA	TCSNAZCA	Tier 3
AZ	CORTARO	TCSNAZCO	Tier 3
AZ	CRAYCROFT	TCSNAZCR	Tier 3
AZ	TUCSON EAST	TCSNAZEA	Tier 3
AZ	FLOWING WELLS	TCSNAZFW	Tier 3
AZ	MT LEMMON	TCSNAZML	Tier 3
AZ	TUCSON NORTH	TCSNAZNO	Tier 3
AZ	RINCON	TCSNAZRN	Tier 3
AZ	TUCSON SOUTHEAST	TCSNAZSE	Tier 3
AZ	TUCSON SOUTH	TCSNAZSO	Tier 3
AZ	TUCSON SOUTHWEST	TCSNAZSW	Tier 3
AZ	TANQUE VERDE	TCSNAZTV	Tier 3
AZ	TUCSON WEST	TCSNAZWE	Tier 3
AZ	TOLLESON	TLNSAZMA	Tier 3
AZ	TOMBSTONE	TMBSAZMA	Tier 3
AZ	TONTO CREEK	TNCKAZMA	Tier 3
AZ	TUBAC	TUBCAZMA	Tier 3
AZ	VAIL NORTH	VAILAZNO	Tier 3
AZ	VAIL SOUTH	VAILAZSO	Tier 3
AZ	WICKENBURG	WCBGAZMA	Tier 3
AZ	WHITE TANKS	WHTKAZMA	Tier 3
AZ	WHITLOW	WHTLAZMA	Tier 3
AZ	WILLCOX	WLXAZMA	Tier 3
AZ	WILLIAMS	WLMNAZMA	Tier 3
AZ	WELLTON	WLTNAZMA	Tier 3
AZ	WINTERSBURG	WNBGAZD1	Tier 3
AZ	WINSLOW	WNSLAZMA	Tier 3
AZ	YARNELL	YRNLAZMA	Tier 3
AZ	FORTUNA	YUMAAZFT	Tier 3
AZ	YUMA MAIN	YUMAAZMA	Tier 3
AZ	YUMA SOUTHEAST	YUMAAZSE	Tier 3
CO	AIR FORCE ACADEMY	AFACCOMA	Tier 3
CO	AGUILAR	AGLRCOMA	Tier 3
CO	ALAMOSA	ALMSCOMA	Tier 3
CO	ALLENS PARK	ALPKCOMA	Tier 3
CO	ASPEN	ASPECOMA	Tier 3
CO	AULT	AULTCOMA	Tier 3
CO	MONAGHAN	AURRCOMB	Tier 3
CO	AVONDALE	AVDLCOMA	Tier 3
CO	AVON	AVONCOMA	Tier 3
CO	BAILEY	BALYCOMA	Tier 3
CO	BRIGHTON	BITNCOMA	Tier 3
CO	GUNBARREL	BLDRCOGB	Tier 3

TRIENNIAL REVIEW REMAND ORDER
QWEST WIRE CENTERS THAT SATISFY THE NONIMPAIRMENT STANDARDS FOR DS1 AND DS3 LOOPS
SORTED BY LOOP TYPE

State	Wire Center Name	CI118	No Impairment for the following:
AZ	TEMPE	TEMPAZMA	DS3 loops
AZ	PHOENIX NORTH	PHNXAZNO	DS3 loops
AZ	PHOENIX MAIN	PHNXAZMA	DS3 loops
CO	DENVER MAIN	DNVRCOMA	DS3 loops
CO	DRY CREEK	DNVRCODC	DS3 loops
ID	BOISE MAIN	BOISIDMA	DS3 loops
MN	MARKET	STPLMNMK	DS3 loops
MN	MPLS DOWNTOWN	MPLSMNDT	DS1 & DS3 loops
OR	PTLD CAPITOL	PTLDOR69	DS1 & DS3 loops
UT	SLKC MAIN	SLKCUTMA	DS1 & DS3 loops
WA	SEATTLE MAIN	STTLWA06	DS1 & DS3 loops